

# United States District Court

FOR THE  
NORTHERN DISTRICT OF CALIFORNIA

VENUE: SAN FRANCISCO

**FILED**

**JUL 25 2019**

SUSAN Y. SOONG  
CLERK, U.S. DISTRICT COURT  
NORTH DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

V.

ROGER KARLSSON,  
a/k/a "Steve Heyden,"  
a/k/a "Euclid Deodoris,"  
a/k/a "Joshua Millard,"  
a/k/a "Lars Georgsson,"  
a/k/a "Paramon Larasoft,"  
a/k/a "Kenth Westerberg,"

**CR 19 340**

and

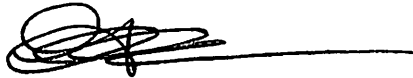
EASTERN METAL SECURITIES,  
a/k/a "EMS,"

**CRB**

DEFENDANT(S).

## INDICTMENT

18 U.S.C. § 1343 - Wire Fraud;  
18 U.S.C. § 1956(a)(1)(B)(i) - Money Laundering;  
15 U.S.C. §§ 78j(b) and 78ff and 17 C.F.R. § 240.10b-5 - Securities Fraud;  
18 U.S.C. § 981(a)(1)(C) & 28 U.S.C. § 2461(c) - Forfeiture Allegation



A true bill.

Foreman

Filed in open court this 25 day of July 2019

ROSE MAHER

Clerk

**NO BAIL WARRANT**

**THOMAS S. HIXSON**  
UNITED STATES MAGISTRATE JUDGE Bail, \$ \_\_\_\_\_

AO 257 (Rev. 6/78)

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT

BY:  COMPLAINT  INFORMATION  INDICTMENT  SUPERSEDING

Name of District Court, and/or Judge/Magistrate Location

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

OFFENSE CHARGED

18 U.S.C. § 1343 - Wire Fraud;
18 U.S.C. § 1956(a)(1)(B)(i) - Money Laundering;
15 U.S.C. §§ 78j(b) and 78ff and 17 C.F.R. § 240.10b-5 - Securities Fraud;
18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c) - Forfeiture Allegation

- Petty
 Minor
 Misdemeanor
 Felony

PENALTY: See attachment.

DEFENDANT - U.S.

ROGER KARLSSON, a/k/a "Steve Heyden," a/k/a "Euclid Deodoris," a/k/a "Joshua Millard," a/k/a "Lars Georgsson," a/k/a "Paramon Larasoft," a/k/a "Kenth Westerberg," and EASTERN METAL SECURITIES, a/k/a "EMS"

DISTRICT COURT NUMBER

CR 19 340

FILED

DEFENDANT

CRB

PROCEEDING

JUL 25 2019

Name of Complainant Agency, or Person (& Title, if Person)

FEDERAL BUREAU OF INVESTIGATION

person is awaiting trial in another Federal or State Court, give name of court

this person/proceeding is transferred from another district per (circle one) FRCrp 20, 21, or 40. Show District

this is a reprosecution of charges previously dismissed which were dismissed on motion of:

U.S. ATTORNEY  DEFENSE

SHOW DOCKET NO.

this prosecution relates to a pending case involving this same defendant

MAGISTRATE CASE NO.

prior proceedings or appearance(s) before U.S. Magistrate regarding this defendant were recorded under

Name and Office of Person Furnishing Information on this form David L. Anderson

U.S. Attorney  Other U.S. Agency

Name of Assistant U.S. Attorney (if assigned) William Frentzen

IS NOT IN CUSTODY

Has not been arrested, pending outcome this proceeding.

If not detained give date any prior summons was served on above charges

- 2)  Is a Fugitive
3)  Is on Bail or Release from (show District)

IS IN CUSTODY

- 4)  On this charge
5)  On another conviction }  Federal  State
6)  Awaiting trial on other charges

If answer to (6) is "Yes", show name of institution

Has detainer been filed?  Yes  No

If "Yes" give date filed

DATE OF ARREST

Month/Day/Year

Or... If Arresting Agency & Warrant were not

DATE TRANSFERRED TO U.S. CUSTODY

Month/Day/Year

This report amends AO 257 previously submitted

ADDITIONAL INFORMATION OR COMMENTS

PROCESS:

SUMMONS  NO PROCESS\*  WARRANT

Bail Amount: \_\_\_\_\_

If Summons, complete following:

Arraignment  Initial Appearance

Defendant Address: \_\_\_\_\_

\* Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

Date/Time: \_\_\_\_\_ Before Judge: \_\_\_\_\_

Comments: \_\_\_\_\_

1 DAVID L. ANDERSON (CABN 149604)  
United States Attorney

2  
3 **FILED**

4 **JUL 25 2019**

5 SUSAN Y. SOONG  
6 CLERK, U.S. DISTRICT COURT  
NORTH DISTRICT OF CALIFORNIA

7  
8 UNITED STATES DISTRICT COURT  
9 NORTHERN DISTRICT OF CALIFORNIA

10 SAN FRANCISCO DIVISION

11 UNITED STATES OF AMERICA,

CASE NO **CR 19 340**

12 Plaintiff,

) VIOLATIONS:

**CRB**

13 v.

) 18 U.S.C. § 1343 – Wire Fraud;

) 18 U.S.C. § 1956(a)(1)(B)(i) – Money Laundering;

) 15 U.S.C. §§ 78j(b) and 78ff and 17 C.F.R. §

) 240.10b-5 – Securities Fraud;

) 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c) –

) Forfeiture Allegation

14 ROGER KARLSSON,  
a/k/a “Steve Heyden,”  
15 a/k/a “Euclid Deodoris,”  
a/k/a “Joshua Millard,”  
16 a/k/a “Lars Georgsson,”  
a/k/a “Paramon Larasoft,”  
17 a/k/a “Kenth Westerberg,”

) SAN FRANCISCO VENUE

18 and

19 EASTERN METAL SECURITIES,  
a/k/a “EMS,”

20 Defendants.

21  
22 INDICTMENT

23 The Grand Jury charges:

24 Introductory Allegations

25 At all times relevant to this Indictment:

26 1. Defendant Roger KARLSSON was a Swedish citizen. KARLSSON created and administered  
27 Defendant EASTERN METAL SECURITIES (www.easternmetalsecurities.com), as well as other  
28 fraudulent websites including HCI25 (www.hci25.net) and CIPP2023 (www.cipp2023.com).

INDICTMENT

1 2. Defendant EASTERN METAL SECURITIES, a/k/a “EMS” was a business and website  
2 (www.easternmetalsecurities.com) designed to communicate false representations to investors to  
3 defraud them of their money and property. The primary investment product was referred to as a “Pre  
4 Funded Reversed Pension Plan.” Investments into EASTERN METAL SECURITIES were represented  
5 to cost approximately \$98 per share and shares were represented to be worth in excess of approximately  
6 \$45,000, as well as being fully guaranteed. KARLSSON and EASTERN METAL SECURITIES made  
7 false statements designed to cause investors to send them money and property, including in and through  
8 the Northern District of California. Investments into EASTERN METAL SECURITIES constituted  
9 sales of securities by KARLSSON and EASTERN METAL SECURITIES, as that term is defined by  
10 Title 15, United States Code, Section 78j(b) and Title 17, Code of Federal Regulations, Section 240.10b-  
11 5. Investors included victims located in the Northern District of California.

12 3. Investors into EASTERN METAL SECURITIES sent money to KARLSSON and EASTERN  
13 METAL SECURITIES and to others, known and unknown to the Grand Jury. Investments were  
14 delivered to KARLSSON and EASTERN METAL SECURITIES, often using virtual currency, such as  
15 Bitcoin. Bitcoin is a form of value that is able to be transacted across thousands of computers connected  
16 on the internet, all running the Bitcoin software. Some of the transfers to KARLSSON involved virtual  
17 currency exchangers including virtual currency exchangers in the Northern District of California.

18 COUNT ONE: (18 U.S.C. § 1343 – Wire Fraud)

19 4. Paragraphs 1 through 3 of this Indictment are re-alleged and incorporated as if fully set forth  
20 here.

21 5. Beginning on or about November 27, 2012, and continuing through on or about June 19, 2019, in  
22 the Northern District of California and elsewhere, the defendants,

23 ROGER KARLSSON, a/k/a “Steve Heyden,” a/k/a “Euclid Deodoris,” a/k/a “Joshua Millard,” a/k/a  
24 “Lars Georgsson,” a/k/a “Paramon Larasoft,” a/k/a “Kenth Westerberg,” and EASTERN METAL  
25 SECURITIES, a/k/a “EMS,”

26 and others, each aided and abetted by the other, knowingly and with the intent to defraud participated in,  
27 devised, and intended to devise a scheme and artifice to defraud as to a material matter, and to obtain  
28 money and property by means of materially false and fraudulent pretenses, representations, and

1 promises, and by means of omission and concealment of material facts, and for the purpose of executing  
2 the aforementioned scheme and artifice to defraud, the defendants did knowingly transmit and cause to  
3 be transmitted in interstate and foreign commerce, by means of wire communications, certain writings,  
4 signs, signals, pictures, and sounds, specifically, the use of the website www.easternmetalsecurities.com  
5 as well as use of Virtual Currency Exchange X, not a defendant herein, to transmit virtual currency  
6 through the Northern District of California and to defendant KARLSSON.

7 All in violation of Title 18, United States Code, Section 1343.

8  
9 COUNT TWO: (15 U.S.C. § 78j(b) and 78ff; 17 C.F.R. § 240.10b-5 – Securities Fraud)

10 6. Paragraphs 1 through 3 of this Indictment are re-alleged and incorporated as if fully set forth  
11 here.

12 7. Beginning on or about November 27, 2012, and continuing through on or about June 19, 2019, in  
13 the Northern District of California and elsewhere, the defendants,

14 ROGER KARLSSON, a/k/a “Steve Heyden,” a/k/a “Euclid Deodoris,” a/k/a “Joshua Millard,” a/k/a  
15 “Lars Georgsson,” a/k/a “Paramon Larasoft,” a/k/a “Kenth Westerberg,” and EASTERN METAL  
16 SECURITIES, a/k/a “EMS,”  
17 and others, each aided and abetted by the other, did knowingly and willfully use and employ  
18 manipulative and deceptive devices and contrivances and directly and indirectly: (i) employ devices,  
19 schemes, and artifices to defraud; (ii) make untrue statements of material facts and omit to state material  
20 facts necessary in order to make the statements made, in light of the circumstances under which they  
21 were made, not misleading; and (iii) engage in acts, practices, and courses of business which would and  
22 did operate as a fraud and deceit upon members of the investing public, in connection with the purchases  
23 and sales of securities and by the use and of the instruments of communication in interstate commerce  
24 and the mails.

25 All done in violation of Title 15, United States Code, Sections 78j(b) and 78ff; and Title 17,  
26 Code of Federal Regulations, Section 240.10b-5.  
27  
28

1 COUNT THREE: (18 U.S.C. § 1956(a)(1)(B)(i) and 2 – Money Laundering)

2  
3 8. Paragraphs 1 through 3 of this Indictment are re-alleged and incorporated as if fully set forth  
4 here.

5 9. Beginning on or about November 27, 2012, and continuing through on or about June 19, 2019, in  
6 the Northern District of California and elsewhere, the defendants,

7 ROGER KARLSSON, a/k/a “Steve Heyden,” a/k/a “Euclid Deodoris,” a/k/a “Joshua Millard,” a/k/a  
8 “Lars Georgsson,” a/k/a “Paramon Larasoft,” a/k/a “Kenth Westerberg,” and EASTERN METAL  
SECURITIES, a/k/a “EMS,”

9 and others, each aided and abetted by the other, did knowingly conduct and attempt to conduct financial  
10 transactions affecting interstate and foreign commerce which involved the proceeds of a specified  
11 unlawful activity, that is wire fraud and securities fraud, knowing that the transaction was designed in  
12 whole and in part to conceal and disguise the nature, location, source, ownership, and proceeds of said  
13 specified unlawful activity, and that while conducting and attempting to conduct such financial  
14 transaction, knew that the property involved in the financial transaction represented the proceeds of  
15 some form of unlawful activity.

16 All in violation of Title 18, United States Code, Sections 1956(a)(1)(B)(i), and 2.

17 FORFEITURE ALLEGATION: (18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c))

18 10. The allegations contained in this Indictment are re-alleged and incorporated by reference for the  
19 purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title  
20 28, United States Code, Section 2461(c).

21 11. Upon conviction for Count One or Two as set forth in this Indictment, the defendants,

22 ROGER KARLSSON, a/k/a “Steve Heyden,” a/k/a “Euclid Deodoris,” a/k/a “Joshua Millard,” a/k/a  
23 “Lars Georgsson,” a/k/a “Paramon Larasoft,” a/k/a “Kenth Westerberg,” and EASTERN METAL  
24 SECURITIES, a/k/a “EMS,”

25 shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and  
26 Title 28, United States Code, Section 2461(c), all property, real or personal, constituting, or derived  
27 from proceeds the defendant obtained directly and indirectly, as the result of those violations, including  
28 but not limited to the following:

- 1 a. Money Judgment: a sum of money equal to the total gross proceeds obtained as a  
2 result of the offenses;
- 3 b. The Elysian Pearl Resort and Bungalows, located at 21/24 Moo 2 Rural Road, Baan-  
4 Dan-Mai, Koh Chang, Thailand, including all real property, buildings, appurtenances,  
5 and improvements thereon;
- 6 c. The residence and real property located at New Nordic Bangtao Water World  
7 Condominium, Tambon Cherngtalay, Amphoe Thalang, Phuket Province, Thailand,  
8 Unit Number N-BWC-D304;
- 9 d. The residence and real property located at New Nordic Bangtao Water World  
10 Condominium, Tambon Cherngtalay, Amphoe Thalang, Phuket Province, Thailand,  
11 Unit Number N-BWC-D313;
- 12 e. The residence and real property located at New Nordic Castle, Apartment No NCA1-  
13 703, Pratamnak Hill Soi 4, Muang Pattaya, Amphoe Banglamung, Chonburi  
14 Province, Thailand;
- 15 f. The residence and real property located at New Nordic's Club 5 Condominium, Unit  
16 Number NCL5-202, Pratamnak Hill Soi 4, Muang Pattaya, Amphoe Banglamung,  
17 Chonburi Province, Thailand;
- 18 g. The residence and real property located at New Nordic Boutique Condominium, Unit  
19 Number NBT-706, Tambon Nongprue, Amphoe Banglamung, Chonburi Province,  
20 Thailand;
- 21 h. The residence and real property located at Emerald Palace Pattaya, 378/352 Moo 12  
22 Kasetsin Soi 9, Prathamnak Road Soi 1, Nongprue, Banglamung, Chonburi, Thailand;
- 23 i. All funds maintained at Krung Thai Bank Public Company in account number  
24 2270316290, held in the name ROGER NILS-JONAS KARLSSON;
- 25 j. All funds maintained at Siam Commercial Bank Public Co. Ltd. in account number  
26 8562354260, held in the name ROGER NILS JONAS KARLSSON;
- 27 k. All funds maintained at Kasikornbank Public Company Limited in account number  
28 0388036648, held in the name ROGER KARLSSON; and



1           1. All funds maintained at Bitcoin Co. Ltd. in the name of ROGER KARLSSON  
2           registered using the email address roger.karlsson@siamcasa.com.

3           If any of the property described above, as a result of any act or omission of the defendant:

- 4           a. cannot be located upon exercise of due diligence;  
5           b. has been transferred or sold to, or deposited with, a third party;  
6           c. has been placed beyond the jurisdiction of the court;  
7           d. has been substantially diminished in value; or  
8           e. has been commingled with other property which cannot be divided without  
9           difficulty,

10 the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21,  
11 United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

12           All pursuant to Title 18, United States Code, Section 981(a)(1)(C), Title 28, United States Code,  
13 Section 2461(c), and Federal Rule of Criminal Procedure 32.2.

14 FORFEITURE ALLEGATION:       (18 U.S.C. § 982(a)(1))

15 12.       The allegations contained in this Indictment are re-alleged and incorporated by reference for the  
16 purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 982(a)(1).

17 13.       Upon conviction for the offense set forth in Count Three of this Indictment, the defendants,  
18       ROGER KARLSSON, a/k/a “Steve Heyden,” a/k/a “Euclid Deodoris,” a/k/a “Joshua Millard,” a/k/a  
19       “Lars Georgsson,” a/k/a “Paramon Larasoft,” a/k/a “Kenth Westerberg,” and EASTERN METAL  
20       SECURITIES, a/k/a “EMS,”

21 shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(1), all  
22 property, real or personal, involved in said violations, and any property traceable to such property,  
23 including, but not limited to, the following:

- 24           a. Money Judgment: a sum of money equal to the total value of the property involved in  
25           the commission of the offense;  
26           b. The Elysian Pearl Resort and Bungalows, located at 21/24 Moo 2 Rural Road, Baan-  
27           Dan-Mai, Koh Chang, Thailand, including all real property, buildings, appurtenances,  
28           and improvements thereon;



- 1 c. The residence and real property located at New Nordic Bangtao Water World  
2 Condominium, Tambon Cherngtalay, Amphoe Thalang, Phuket Province, Thailand,  
3 Unit Number N-BWC-D304;
- 4 d. The residence and real property located at New Nordic Bangtao Water World  
5 Condominium, Tambon Cherngtalay, Amphoe Thalang, Phuket Province, Thailand,  
6 Unit Number N-BWC-D313;
- 7 e. The residence and real property located at New Nordic Castle, Apartment No NCA1-  
8 703, Pratamnak Hill Soi 4, Muang Pattaya, Amphoe Banglamung, Chonburi  
9 Province, Thailand;
- 10 f. The residence and real property located at New Nordic's Club 5 Condominium, Unit  
11 Number NCL5-202, Pratamnak Hill Soi 4, Muang Pattaya, Amphoe Banglamung,  
12 Chonburi Province, Thailand;
- 13 g. The residence and real property located at New Nordic Boutique Condominium, Unit  
14 Number NBT-706, Tambon Nongprue, Amphoe Banglamung, Chonburi Province,  
15 Thailand;
- 16 h. The residence and real property located at Emerald Palace Pattaya, 378/352 Moo 12  
17 Kasetsin Soi 9, Prathamnak Road Soi 1, Nongprue, Banglamung, Chonburi, Thailand;
- 18 i. All funds maintained at Krung Thai Bank Public Company in account number  
19 2270316290, held in the name ROGER NILS-JONAS KARLSSON;
- 20 j. All funds maintained at Siam Commercial Bank Public Co. Ltd. in account number  
21 8562354260, held in the name ROGER NILS JONAS KARLSSON;
- 22 k. All funds maintained at Kasikornbank Public Company Limited in account number  
23 0388036648, held in the name ROGER KARLSSON; and
- 24 l. All funds maintained at Bitcoin Co. Ltd. in the name of ROGER KARLSSON  
25 registered using the email address roger.karlsson@siamcasa.com.
- 26

27 If any of the property described above, as a result of any act or omission of the defendant:

- 28 a. cannot be located upon exercise of due diligence;

- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1).


All pursuant to Title 18, United States Code, Sections 981(a)(1) and 982(a)(1) and (b)(1), Title 28, United States Code, Section 2461(c), and Federal Rule of Criminal Procedure 32.2.

DATED: 7/25/19

A TRUE BILL.

  
 \_\_\_\_\_  
 FOREPERSON

DAVID L. ANDERSON  
 United States Attorney

  
 \_\_\_\_\_

WILLIAM FRENTZEN  
 KAREN BEAUSEY  
 Assistant United States Attorneys  
 CATHERINE ALDEN PELKER  
 Trial Attorney

**FILED**

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

**JUL 25 2019**

SUSAN Y. SOONG  
CLERK, U.S. DISTRICT COURT  
NORTH DISTRICT OF CALIFORNIA

**CRIMINAL COVER SHEET**

*Instructions: Effective November 1, 2016, this Criminal Cover Sheet must be completed and submitted, along with the Defendant Information Form, for each new criminal case.*

**CASE NAME:**

**CASE NUMBER:**

**USA V. ROGER KARLSSON, a/k/a "Steve Heyden," a/k/a "Euclid Deodoris,"  
a/k/a "Joshua Millard," a/k/a "Lars Georgsson," a/k/a "Paramon Larasoft,"  
a/k/a "Kent Westerberg," and EASTERN METAL SECURITIES, a/k/a "EMS"**

**CR 19 340**

**Is This Case Under Seal?**

Yes No

**Total Number of Defendants:**

1 2-7  8 or more

**Does this case involve ONLY charges under 8 U.S.C. § 1325 and/or 1326?**

Yes No

**Venue (Per Crim. L.R. 18-1):**

SF  OAK SJ

**Is this a potential high-cost case?**

Yes No

**Is any defendant charged with a death-penalty-eligible crime?**

Yes No

**Is this a RICO Act gang case?**

Yes No

**Assigned AUSA  
(Lead Attorney): William Frentzen**

**Date Submitted: 07/25/2019**

**Comments:**