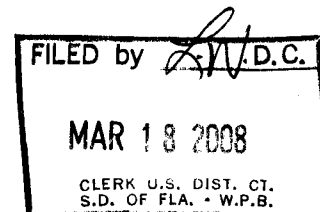


UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 07-80179-CR-HURLEY/VITUNAC(s)

18 U.S.C. §1341
18 U.S.C. §1343
18 U.S.C. §1349
18 U.S.C. §1957



UNITED STATES OF AMERICA,

vs.

RON WILLIAMS,

Defendant.

_____ /

SUPERSEDING INDICTMENT

The Grand Jury charges that:

GENERAL ALLEGATIONS

At all times relevant to this Superseding Indictment:

1. Defendant RON WILLIAMS was a stock promoter who operated a company called Victoria Financial Consultants, LLC. ("Victoria Financial").

2. International Systems and Electronics, Corp. ("ISE") was a company that was a provider of point-of-sale and store-automation systems and services for retail outlets, grocery stores and restaurants in South Florida, the Caribbean and Latin America.

3. An Agent of the Federal Bureau of Investigation ("FBI"), acting in an undercover capacity, posed as a corrupt manager of a fictitious unregulated hedge fund located in West Palm Beach, Florida named Fillmore Capital, LLC ("Fillmore Capital"). The undercover FBI agent

(“UCA”) offered to have Fillmore Capital purchase securities of a given company to the exclusion of other securities in exchange for an undisclosed payment.

4. Global Connect Services, Inc (“Global Connect”) was a consulting company purportedly used by the undercover FBI agent to receive payment of undisclosed fee.

COUNT 1

MAIL FRAUD

1. The allegations contained in paragraphs 1 through 4 of the General Allegations section of this Indictment are realleged and incorporated as though fully set forth herein.

2. From on or about September 17, 2007, to on or about September 25, 2007, at Palm Beach County, in the Southern District of Florida, and elsewhere, the defendant,

RON WILLIAMS,

did knowingly and willfully devise and intend to devise a scheme and artifice to defraud and for obtaining money and property by means of materially false and fraudulent pretenses, representations and promises, and attempting to do so, knowing that the pretenses, representations and promises were false when made.

OBJECT OF THE SCHEME TO DEFRAUD

3. It was the purpose and object of the scheme and artifice to defraud for the defendant to unjustly enrich himself by lying to Fillmore Capital in order to induce it to invest money in shares of ISE stock.

SCHEME AND ARTIFICE TO DEFRAUD

The manner and means by which the defendant, **RON WILLIAMS**, sought to accomplish the object of the fraudulent scheme and artifice included, among others, the following:

4. The defendant attempted to induce Fillmore Capital to invest \$1,000,000 by falsely representing that the hedge fund would receive freely tradeable shares of ISE stock for its investment.

5. Fillmore Capital was falsely told that an initial public offering (“IPO”) of ISE stock was imminent. The hedge fund was falsely told that the invested funds would be held in escrow, and that its investment would more than double following the IPO. In reality, an IPO of ISE stock was not imminent, the invested funds were not held in escrow, and the invested funds were used for matters other than the IPO of ISE stock.

6. As part of his fraudulent scheme, the defendant agreed to pay an undisclosed fee of 20% to the UCA acting as a manager of Fillmore Capital in exchange for having him violate his fiduciary duty to the fund by buying \$1,000,000 of ISE stock to the exclusion of the stock of another company.

7. As part of his fraudulent scheme, the defendant agreed that the 20% payment to the UCA would not be disclosed to Fillmore Capital that was purportedly already paying the UCA a management fee for conflict-free investment advice.

8. As part of his fraudulent scheme, the defendant also agreed that the 20% payment to the UCA would be disguised by payments to Global Connect pursuant to a sham consulting contract between Victoria Financial and Global Connect.

9. On September 19, 2007, the defendant executed the sham consulting agreement and the subscription agreement for the purchase of \$1,000,000 of ISE stock by Fillmore Capital. The defendant caused the UCA to wire transfer \$50,000 to the defendant’s bank account in Texas for the first of three transactions which would total the purchase of \$1,000,000 of ISE stock by the UCA.

ACTS IN EXECUTION OF THE SCHEME AND ARTIFICE TO DEFRAUD

10. On or about September 18, 2007, the defendant, for the purpose of executing and in furtherance of the aforesaid scheme and artifice to defraud and for obtaining money and property by means of materially false and fraudulent pretenses, representations and promises, and attempting to do so, did knowingly cause to be delivered by the United States Postal Service or by private or commercial interstate carrier, according to the directions thereon, matters and things, namely, investor information on ISE.

All in violation of Title 18, United States Code, Sections 1341 and 1349.

COUNTS 2-3

WIRE FRAUD

1. The allegations contained in paragraphs 1 through 4 of the General Allegations section and paragraphs 3 through 10 of Count 1 of this Superseding Indictment are realleged and incorporated by reference as though fully set forth herein.

2. From on or about September 17, 2007, to on or about September 25, 2007, at Palm Beach County, in the Southern District of Florida, and elsewhere, the defendant,

RON WILLIAMS,

did knowingly and willfully devise and intend to devise a scheme and artifice to defraud and for obtaining money and property by means of materially false and fraudulent pretenses, representations and promises, and attempting to do so, knowing that the pretenses, representations and promises were false when made, as more particularly described in the allegations contained in paragraphs 3 through 10 of Count 1 of this Superseding Indictment.

ACTS IN EXECUTION OF THE SCHEME AND ARTIFICE TO DEFRAUD

3. On or about the dates specified below, the defendant, for the purpose of executing and in

furtherance of the aforesaid scheme and artifice to defraud and for obtaining money and property by means of materially false and fraudulent pretenses, representations and promises, and attempting to do so, did knowingly transmit and cause to be transmitted, by means of wire communications in interstate and foreign commerce, certain writings, signs, signals, pictures and sounds, as more particularly described in each count below:

<u>COUNT</u>	<u>DATE</u>	<u>WIRE COMMUNICATION</u>
2	September 19, 2007	A \$50,000 wire transfer from the Fillmore Capital SunTrust Bank account in Florida to the defendant's Victoria Financial account at Bank of Texas
3	September 19, 2007	A \$10,000 wire transfer from the defendant's Victoria Financial account at Bank of Texas to the Global Connect account at SunTrust Bank in Florida

All in violation of Title 18, United States Code, Sections 1343 and 1349.

COUNT 4

WIRE FRAUD

1. The allegations contained in paragraphs 1 and 2 of the General Allegations section this Superseding Indictment are realleged and incorporated by reference as though fully set forth herein.

2. From in or about June 2007, to on or about the date of this Superseding Indictment, at Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendant,

RON WILLIAMS,

did knowingly and willfully devise and intend to devise a scheme and artifice to defraud and for obtaining money and property by means of materially false and fraudulent pretenses, representations

and promises, knowing that the pretenses, representations and promises were false when made.

OBJECT OF THE SCHEME TO DEFRAUD

3. It was a purpose and object of the scheme and artifice to defraud for the defendant to unjustly enrich himself by lying to investors in order to induce them to invest money in shares of ISE stock.

SCHEME AND ARTIFICE TO DEFRAUD

The manner and means by which the defendant, **RON WILLIAMS**, sought to accomplish the object of the fraudulent scheme and artifice included, among others, the following:

4. The defendant induced investors to invest over \$500,000 by falsely representing to the investors that they would receive freely tradeable shares of ISE stock for their investment. In reality, the defendant did not have freely tradable shares of ISE stock.

5. Investors were falsely told that an initial public offering (“IPO”) of ISE stock was imminent. Investors were falsely told that they could receive their initial capital investment back within days through sale of a portion of the investors’ ISE stock following the IPO, and that their investment would more than double. In reality, an IPO of ISE stock was not imminent, and investor funds were used for other matters.

6. From in or about June 2007, through in or about October 2007, over \$500,000 of investor monies were deposited into bank accounts controlled by the defendant. Thereafter, the investors’ funds were used for other matters, including personal use by the defendant.

7. When investors questioned the defendant about their investment, the defendant made numerous misrepresentations in order to lull the investors. For example, on January 16, 2008, the defendant informed investor F.H. that the IPO of ISE stock was imminent, and that F.H.’s investment

funds were in escrow. From December 20, 2007, through February 13, 2008, the defendant sent emails to an investment advisor, whose clients had invested with the defendant, indicating that the IPO of ISE stock was imminent.

ACTS IN EXECUTION OF THE SCHEME AND ARTIFICE TO DEFRAUD

8. On or about June 29, 2007, the defendant, for the purpose of executing and in furtherance of the aforesaid scheme and artifice to defraud and for obtaining money and property by means of materially false and fraudulent pretenses, representations and promises, did knowingly cause to be transmitted, by means of wire communications in interstate and foreign commerce, certain writings, signs, signals, pictures and sounds, namely, a wire transfer of \$200,000 from investor F.H.'s bank in California to the defendant's bank in Texas.

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

COUNT 5

MONEY LAUNDERING

1. The allegations contained in paragraphs 1 through 8 of Count 4 of this Superseding Indictment are realleged and incorporated by reference as though fully set forth herein.

2. On or about the dates specified below, at Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendant,

RON WILLIAMS,

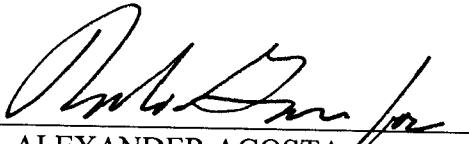
did knowingly engage and attempt to engage in a monetary transaction, as specified below, affecting interstate and foreign commerce, by and through a financial institution, in criminally derived property of a value greater than \$10,000, such property having been derived from a specified unlawful activity, that is, wire fraud, in violation of Title 18, United States Code, Sections 1343:

<u>COUNT</u>	<u>DATE</u>	<u>MONETARY TRANSACTION</u>
5	June 22, 2007	Check (#1511) for \$30,000 written on the account of TBECK Capital at Bank of Texas issued to Poggi design

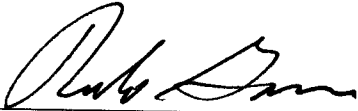
All in violation of Title 18, United States Code, Section 1957.

A TRUE BILL

FOREPERSON



R. ALEXANDER ACOSTA
UNITED STATES ATTORNEY



ROLANDO GARCIA
ASSISTANT UNITED STATES ATTORNEY

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: Ron Williams

Case No: 07-80179-Cr-Hurley/Vitunac(s)

Count #: 1

Mail fraud

18 USC §§ 1341 & 1349

* Max. Penalty: 20 years imprisonment; \$250,000 fine

Count #: 2-3

Wire fraud

18 USC §§ 1343 & 1349

*Max. Penalty: 20 years imprisonment; \$250,000 fine (as to each count)

Count #: 4

Wire fraud

18 USC § 1343

*Max. Penalty: 20 years imprisonment; \$250,000 fine

Count #: 5

Money laundering

18 USC § 1957

*Max. Penalty: 10 years imprisonment; \$250,000 fine

***Refers only to possible term of incarceration, does not include possible fines, restitution, special assessments, parole terms, or forfeitures that may be applicable.**