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10 UNITED STATES OF AMERICA,

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UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

20cr00201-SVW CR No.

Plaintiff,

INFORMATION

[18 U.S.C. § 1343: Wire Fraud]

The United States Attorney charges:

[18 U.S.C. § 1343]

## INTRODUCTORY ALLEGATIONS Α.

aka "Dr. Tony Mariot" and

Defendant.

"Brice Carrington,"

v.

ANTONIO MARIOT WILSON,

At times relevant to this Information:

- Defendant ANTONIO MARIOT WILSON, also known as "Dr. Tony Mariot" and "Brice Carrington," was a resident of Los Angeles County, within the Central District of California.
- The University of California, Los Angeles ("UCLA") was a prestigious public research university in Los Angeles, California, within the Central District of California.
- The University of Oxford was a prestigious collegiate 3. research university in Oxford, England.

- 4. The United States Navy Sea, Air, and Land Teams ("Navy SEALs") constituted the United States Navy's primary special operations force and a component of the Naval Special Warfare Command. The Navy SEALs were a prestigious and exclusive component of the United States armed forces.
- 5. The American Broadcasting Company ("ABC") was an established and well-known American commercial broadcast radio and television network owned by the Disney Media Networks division of the Walt Disney Company.
- 6. EA Sports, a part of the Electronic Arts company, was an established and well-known developer and publisher of sports video games.

## B. THE SCHEME TO DEFRAUD

- 7. Beginning in or around May 2015, and continuing until at least in or around October 2018, in Los Angeles County, within the Central District of California, and elsewhere, defendant WILSON, knowingly and with intent to defraud, devised, participated in, executed, and attempted to execute a scheme to defraud J.L., Au.H., Ar.H., and S.K. (the "victims") as to material matters, and to obtain moneys, funds, assets, and other property owned by and in the custody and control of the victims by means of material false and fraudulent pretenses, representations, and promises, and the concealment of material facts.
- 8. The fraudulent scheme operated and was carried out, in substance, as follows:
- a. Defendant WILSON would meet the victims, often through location-based dating applications for individuals looking for a romantic relationship.

- Defendant WILSON would induce the victims into 1 b. engaging in romantic relationships with him by making the following 2 false and fraudulent statements and representations, among others, 3 4 which defendant WILSON knew were false when he made them and which 5 defendant WILSON used to create a false impression of legitimacy and prestige: 6 7 i. that defendant WILSON was a Navy SEAL; 8 ii. that defendant WILSON graduated from Oxford 9 University; and 10
  - iii. that defendant WILSON was a professor at Oxford University who was currently teaching biblical antiquities at UCLA.

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- c. Relying on the intimacy and admiration he cultivated in his victims through this false impression, defendant WILSON would induce the victims to invest in one of his two companies:
- $\hbox{i.} \quad \hbox{Ultimate FX, also known as Pinnacle Ultimate} \\ \hbox{(``Ultimate FX''), which defendant WILSON claimed was a sound design company; and}$
- ii. 2nd Life, which defendant WILSON claimed was a software business designed to provide instruction through animated learning on applying for government benefits.
- d. In order to induce the victims to invest in these companies, defendant WILSON made the following false and fraudulent statements, representations, and promises, among others, to the victims, which defendant WILSON knew were false when he made them:
- i. that the victims' funds would be invested in Ultimate FX or 2nd Life;
- ii. that ABC and EA Sports had used Ultimate FX to supply sound effects for their television shows and video games;

- iii. that defendant WILSON had met with venture capital investors who had valued 2nd Life at over \$30 million and who wanted to invest in 2nd Life; and
- iv. that 2nd Life had a present valuation of \$3.2 million.
- e. Defendant WILSON further omitted and concealed the following material facts, among others, from his victims:
- i. that defendant WILSON spent victim funds to fund his own lifestyle and pay for his personal expenses; and
- ii. that defendant WILSON had previously admitted under oath to carrying out a scheme to defraud investors who invested money with him for the purpose of developing a sound design company called Ultimate FX.
- f. Defendant WILSON would sell unregistered securities in 2nd Life to the victims by distributing "shareholder agreements" and "stock purchase agreements" to the victims.
- g. Defendant WILSON would accept investments for Ultimate FX and 2nd Life from the victims in the form of cashier's checks, personal checks, and wire transfers.
- h. After accepting the victims' funds, defendant WILSON would not invest the money in his companies as promised, but would instead spend it on personal expenditures, such as paying his credit card bills, buying luxury items, and paying his rent.

## C. USE OF THE WIRES

9. On or about August 8, 2018, in Los Angeles County, within the Central District of California, and elsewhere, defendant WILSON, for the purpose of executing and attempting to execute the above-described scheme to defraud, transmitted and caused the transmission

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1	of, by means of interstate wires, an email from an account housed by
2	Google to Ar.H. attaching a stock purchase agreement for 2nd Life
3	signed by defendant WILSON and Ar.H., via a server located outside of
4	California.
5	NICOLA T. HANNA
6	United States Attorney
7	Scott M. Garringer Deputy Chief, Criminal Division For:
8	BRANDON D. FOX Assistant United States Attorney
9	Chief, Criminal Division
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