

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - - x
:
UNITED STATES OF AMERICA :
:
- v. - : INDICTMENT
:
ASA SAINT CLAIR, : 19 Cr. ____
a/k/a "Asa Williams," :
a/k/a "Asa Sinclair," :
:
Defendant. :
- - - - - x

COUNT ONE
(Wire Fraud)

The Grand Jury charges:

BACKGROUND

1. At all times relevant to this Indictment, ASA SAINT CLAIR, a/k/a "Asa Williams," a/k/a "Asa Sinclair," the defendant, purported to be the President of World Sports Alliance, an entity SAINT CLAIR falsely represented to be engaged in a digital coin offering of a purported blockchain-based digital token referred to as "IGOBIT."

STATUTORY ALLEGATIONS

2. From at least in or about November 2017 up to and including on or about September 2019, in the Southern District of New York and elsewhere, ASA SAINT CLAIR, a/k/a "Asa Williams," a/k/a "Asa Sinclair," the defendant, willfully and knowingly, having devised and intending to devise a scheme and artifice to defraud, and for obtaining money and property by

means of false and fraudulent pretenses, representations, and promises, transmitted and caused to be transmitted by means of wire, radio, and television communication in interstate and foreign commerce, writings, signs, signals, pictures, and sounds for the purpose of executing such scheme and artifice, to wit, SAINT CLAIR, through phone calls and text messages made from New York, New York, made and caused to be made false representations to individuals that they would receive guaranteed returns on a convertible note tied to an initial coin offering being offered by World Sports Alliance, whereas in truth and in fact, investor funds were not dedicated to any initial coin offering and instead were diverted by SAINT CLAIR for his personal expenses.

(Title 18, United States Code, Sections 1343 and 2.)

FORFEITURE ALLEGATIONS

3. As the result of committing the offense alleged in Count One of this Indictment, ASA SAINT CLAIR, a/k/a "Asa Williams," a/k/a "Asa Sinclair," the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28 United States Code, Section 2461(c), any and all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of said offense, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense.

Substitute Asset Provision

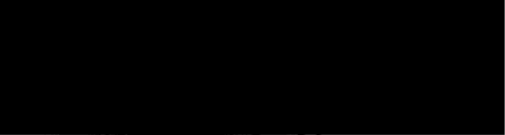
4. If any of the forfeitable property described above, as a result of any act or omission of ASA SAINT CLAIR, a/k/a "Asa Williams," a/k/a "Asa Sinclair," the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- 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 subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) and Title 28, United States

Code, Section 2461(c), to seek forfeiture of any other property of said defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Section 981;
Title 21, United States Code, Section 853; and
Title 28, United States Code, Section 2461.)



Foreperson

Geoffrey S. Berman
GEOFFREY S. BERMAN
United States Attorney

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ASA SAINT CLAIR,
a/k/a "Asa Williams,"
a/k/a "Asa Sinclair,"
Defendant.

INDICTMENT

19 Cr. ____

(18 U.S.C. §§ 1343 and 2.)

Foreperson

GEOFFREY S. BERMAN
United States Attorney.