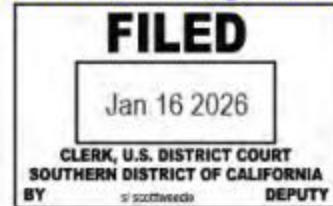


EXHIBIT A



SEALED

ORDERED UNSEALED on 01/21/2026 s/ STN

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA
August 2024 Grand Jury

UNITED STATES OF AMERICA,

Plaintiff,

v.

BRETT DAVID ROSEN (1),
aka Brett Hackspacher,
DEBORAH RACHEL ROSEN (2),
aka Deborah Rachel Braun,
RB CAPITAL PARTNERS, INC. (3),

Defendants.

Case No. '26 CR192 DMS

I N D I C T M E N T

Title 18, U.S.C., Sec. 371,
Title 15, U.S.C., Secs. 78j(b),
78ff, and Title 17, C.F.R.,
Sec. 240.10b-5 - Conspiracy to
Commit Securities Fraud;
Title 18, U.S.C., Sec. 1956(h) -
Conspiracy to Launder Monetary
Instruments; Title 18, U.S.C.,
Sec. 1957 - Money Laundering;
Title 18, U.S.C.,
Secs. 981(a)(1)(C) and 982(a)(1),
and Title 28, U.S.C.,
Sec. 2461(c) - Criminal
Forfeiture

The Grand Jury charges, at all times material:

INTRODUCTORY ALLEGATIONS

Relevant Individuals and Entities

1. Defendant BRETT DAVID ROSEN, aka Brett Hackspacher, ("BRETT"),
a resident of La Jolla, California, was a co-managing partner of
defendant RB CAPITAL PARTNERS, INC. ("RB CAPITAL") and the sole director
of Seapoint Capital Partners, Inc. and Rosen Capital, LLC. BRETT used X
Corp. ("X") (formerly known as Twitter) account "@BrettRosen325." BRETT
was a financier of microcap companies and posted on X about his
investments.

1 2. Defendant DEBORAH RACHEL ROSEN, aka Deborah Rachel Braun,
2 ("DEBORAH"), a resident of La Jolla, California, was a co-managing
3 partner of RB CAPITAL with BRETT. DEBORAH used X account
4 "@deborahrachelb." DEBORAH worked with BRETT to finance microcap
5 companies and post on X about their investments.

6 3. Defendant RB CAPITAL was an entity incorporated in California
7 in April 2017, with its office in La Jolla, California. According to its
8 corporate formation documents, BRETT was the co-director and Chief
9 Executive Officer ("CEO") of RB CAPITAL, and DEBORAH was the co-director,
10 Chief Financial Officer ("CFO"), and Secretary of RB CAPITAL. RB CAPITAL
11 predominately made debt investments into growing companies in exchange
12 for company stock, which it then traded on the open market.

13 4. Optec International, Inc., founded in 2012, was a Carlsbad,
14 California, based publicly traded company on the Over-the-Counter
15 markets ("OTC") using ticker "OPTI." OPTI focused primarily on safety
16 products and green technologies.

17 5. Sunshine Biopharma, Inc., founded in 2006, was a Colorado
18 incorporated publicly traded pharmaceutical company, first on the OTC
19 markets and then on the NASDAQ using ticker "SBFM," with headquarters
20 in Fort Lauderdale, Florida. SBFM focused primarily on oncology and
21 antiviral drugs.

22 6. BlockQuarry Corp., formerly known as ISW Holdings, Inc.,
23 founded in 2021, was a Houston, Texas, based publicly traded company on
24 the OTC markets, first using ticker "ISWH" and then using ticker "BLQC"
25 after a name change in 2022. BLQC focused primarily on digital currency
26 and mining.

1 7. Solar Integrated Roofing Corp., founded in 2007, was a Poway,
2 California, and then Henderson, Nevada, based publicly traded company
3 on the OTC markets using ticker "SIRC." SIRC focused primarily on solar
4 roofing. From in or about February 2016, to in or about May 2023, Co-
5 Conspirator 1 ("CC-1"), a resident of Escondido, California, was the CEO
6 of SIRC.

7 8. Cyberlux, Corp., founded in 2000, was a Nevada based publicly
8 traded company on the OTC markets using ticker "CYBL," with headquarters
9 in Research Triangle, North Carolina. CYBL focused primarily on
10 providing solutions to the defense industry technology.

11 9. Ilustrato Pictures International Inc., founded in 2021, was a
12 publicly traded company on the OTC markets using ticker "ILUS"
13 headquartered in New York, New York. ILUS operated out of New York,
14 London, and Dubai, and focused primarily on technology, engineering, and
15 manufacturing in public safety equipment and services, and recycling of
16 precious metals.

17 10. CC-2, a resident of North Salt Lake, Utah, was BRETT, DEBORAH,
18 and RB CAPITAL's consultant and trader. Since 2019, CC-2 has been the
19 president of a consulting company that provided portfolio management,
20 capital markets analysis, corporate strategy, and operations strategy.
21 From approximately 2020 to 2021, CC-2 also worked as a trader for an
22 offshore brokerage in the Cayman Islands. CC-2 was formerly a registered
23 broker from approximately 2015 to 2019.

24 11. PERSON A was introduced to BRETT, DEBORAH, and CC-1 as a
25 financier of microcap companies. Unbeknownst to BRETT, DEBORAH, and
26 CC-1, PERSON A was an FBI confidential human source.

1 Background Provisions

2 12. The Securities Act of 1933 and the Securities Exchange Act of
3 1934 prohibited manipulative and deceptive trading practices. The
4 purpose of these acts was to ensure a fair and transparent securities
5 market by providing investors with the basic information they should
6 know when deciding whether to invest.

7 13. The Securities and Exchange Commission ("SEC") is the agency
8 which administers and enforces the federal securities laws.

9 14. Publicly traded companies were subject to legal and regulatory
10 requirements by the SEC under the federal securities laws. Among other
11 things, the SEC required that these companies file a variety of forms
12 disclosing the state of their business, including, among other things,
13 their financial condition, assets, policies, and certain securities
14 ownership information.

15 15. Scalping is a type of manipulative practice in which the owner
16 of shares of a security directly or indirectly recommends, or "touts,"
17 that security for investment by others to increase the stock price and/or
18 the stock trading volume, or prevent the same from falling, while not
19 disclosing their intent to sell that stock at a profit upon the rise in
20 market price or before the price falls. Touting refers to stock promotion
21 that can occur through various means, including by social media, and
22 which involves the dissemination of information about a publicly traded
23 company intended to attract buyers and increase demand in the stock.

1 Count 1 - Conspiracy

2 (18 U.S.C. § 371)

3 16. Paragraphs 1 through 15 are re-alleged as if fully set forth
4 herein.

5 17. Beginning on a date unknown to the grand jury but no later
6 than August 10, 2020, and continuing until on or about October 14, 2024,
7 within the Southern District of California and elsewhere, defendants
8 BRETT DAVID ROSEN, aka Brett Hackspacher, ("BRETT"), DEBORAH RACHEL
9 ROSEN, aka Deborah Rachel Braun, ("DEBORAH"), CC-1, CC-2, and other
10 individuals and entities known and unknown to the grand jury, did
11 knowingly and intentionally conspire to commit an offense against the
12 United States, that is, securities fraud, namely, to knowingly and
13 willfully, directly and indirectly, by the use of the means and
14 instrumentalities of interstate commerce and of the mails, use and employ
15 manipulative and deceptive devices and contrivances in connection with
16 the purchase and sale of securities by (a) employing devices, schemes
17 and artifices to defraud, (b) making and causing to be made untrue
18 statements of material fact, and omitting to state material facts
19 necessary in order to make the statements made, in light of the
20 circumstances under which they were made, not misleading, and (c)
21 engaging in acts, practices, and courses of business which operated and
22 would operate as a fraud and deceit upon any persons, including members
23 of the investing public and sellers and purchasers of securities of (1)
24 Optec International, Inc. (OPTI), (2) Sunshine Biopharma, Inc. (SBFM),
25 (3) BlockQuarry Corp. (BLQC), formerly known as ISW Holdings, Inc.
26 (ISWH), (4) Solar Integrated Roofing Corp. (SIRC), (5) Cyberlux Corp.

1 (CYBL), and (6) Ilustrato Pictures International Inc. (ILUS), in
2 violation of Title 15, United States Code, Sections 78j(b) and 78ff, and
3 Title 17, Code of Federal Regulations, Section 240.10b-5.

4 PURPOSE OF THE CONSPIRACY

5 18. It was the purpose of the conspiracy that BRETT and DEBORAH
6 engaged in a market manipulation scheme by touting the securities of
7 OPTI, SBFM, BLQC, SIRC, CYBL, and ILUS on social media, including X, to
8 increase the stock price and stock trading volume, and preventing the
9 same from falling, while providing investors, potential investors, and
10 the market false and misleading information, and material omissions,
11 about their own positions in those securities and secretly selling them
12 at a profit upon the rise in market price or before the price fell.

13 MANNER AND MEANS

14 19. BRETT and DEBORAH accomplished the purpose of the conspiracy
15 by:

16 a. Seeking out microcap companies with aged debt and, using
17 their entity defendant RB CAPITAL, entering into funding agreements with
18 those companies whereby they purchased the aged debt and continued to
19 loan the companies money in exchange for convertible promissory notes
20 that, on their face, converted to shares of stock of the companies at a
21 fixed 500% premium-to-market price;

22 b. Coordinating with company management to amend the
23 conversion price of the debt and promissory notes at a steep discount
24 to market, and thereby obtaining significant quantities of discounted
25 stock;

1 c. Purposefully failing to disclose, and causing to fail to
2 disclose, the amended discounted stock price to the market, and
3 purposefully delaying, and causing to purposefully delay, disclosure of
4 the amended discounted stock price to the market;

5 d. Posting messages on social media touting the merits of
6 the companies in which they invested - such as information about
7 purported upcoming developments in the companies; their own purported
8 desire to be long-term investors; the purported benefit to the company
9 of the capital funding provided by BRETT, DEBORAH, and RB CAPITAL; their
10 purported elimination of toxic debt owed by the company; and details of
11 the 500% premium-to-market convertible debt notes omitting disclosure
12 of their later amended discounted conversions - to artificially increase
13 demand for the stock, and prevent the same from falling;

14 e. Selling the discounted stock they obtained at or around
15 the time of their social media touts without disclosing, and while
16 affirmatively misrepresenting, the fact of their selling and the profits
17 they were making to investors, potential investors, and the market, in
18 order to enrich themselves.

19 OVERT ACTS IN FURTHERANCE OF THE CONSPIRACY

20 20. In furtherance of the conspiracy, and to effect and accomplish
21 its objects, the following acts, among others, were committed within the
22 Southern District of California and elsewhere:

23 OPTI

24 a. On or about August 10, 2020, BRETT and DEBORAH prepared
25 a funding agreement for OPTI, whereby RB CAPITAL would buy aged company
26 debt, agree to amend the terms of that debt, and, after the initial

1 issuance of OPTI shares pursuant to the conversion of that debt, make
2 loans payments to OPTI totaling "\$3,000,000 to \$15,000,000+" in the form
3 of 500% premium-to-market fixed convertible promissory notes.

4 b. On or about August 26, 2020, RB CAPITAL agreed to purchase
5 aged debt owed by OPTI to a third party in the amount of \$121,635, which
6 was convertible into OPTI shares at 50% discount to market ("4/10/2019
7 debt note").

8 c. On or about August 27, 2020, RB CAPITAL and OPTI amended
9 the 4/10/2019 debt note to reflect a conversion price of \$0.0003 per
10 share, which was approximately 99% discount to market.

11 d. Between on or about August 31, 2020, on or about
12 October 15, 2020, and on or about February 16, 2021, RB CAPITAL elected
13 to convert the amended 4/10/2019 debt note into a total of approximately
14 420,266,667 shares of OPTI common stock.

15 e. On or about September 23, 2020, DEBORAH texted the CEO
16 of OPTI, "When are you sending over the draft for tomorrow's release?
17 We need to get that out soon on our end. Thank you!" followed by, "We
18 will want you to distribute this one at 8 am EST tomorrow like last
19 time."

20 f. On or about September 24, 2020, OPTI issued a press
21 release announcing it had secured financing of "\$5,000,000+" from RB
22 CAPITAL in the form of "premium to market 12 month promissory notes."

23 g. In or about December 2020, BRETT posted twice on X, with
24 "fresh photos" from his and DEBORAH's tour of the OPTI warehouse
25 depicting the inventory. One of his posts received 69,551 views and was
26

1 interacted with 9,164 times. The other post received 21,812 views and
2 was interacted with 2,155 times.

3 h. On or about January 2, 2021, BRETT posted the following
4 two posts on X: "@Jattsheikh1 @YoungDoffy I did not sell even one single
5 share of \$opti so how did I benefit? \$opti" and "@TellyTiger5 @jmsellsnj
6 My pleasure. I am 100% in \$opti for the long haul as RB Capital makes
7 real money by the stock uplisting to the Nasdaq. Feel free to reach out
8 anytime and ask me questions. \$opti." Between on or about September 11,
9 2020, and on or about December 29, 2020, RB CAPITAL sold approximately
10 244,627,998 shares of OPTI for gross sale proceeds of approximately
11 \$10,616,646.

12 i. On or about February 13, 2021, DEBORAH sent an email to
13 the CEO of OPTI, copying BRETT, with subject line, "Disclosing RB Notes
14 and Conversions," providing an excerpt of a disclosure about RB CAPITAL
15 notes and conversions in a quarterly filing by SBFM, which "does not
16 name" RB CAPITAL and was "a good way to disclose without disclosing."

17 j. On or about March 4, 2021, DEBORAH sent an email to the
18 CEO of OPTI, copying BRETT, with subject line, "Summary of Action Items
19 from Call," providing a bullet-point list of items for the CEO to
20 complete, including, "IR consulting and Twitter engagement," "Q&A on
21 Twitter with direct responses," and "Antigen test PR for re-entry into
22 the US- quote from Amanda and Kyle."

23 k. On or about June 7, 2021, RB CAPITAL agreed to purchase
24 aged debt owed by OPTI to a third party in the amount of \$97,843, which
25 was convertible into OPTI shares at \$0.00065 per share ("11/25/2019 debt
26 note").

1 q. On or about August 27, 2020, RB CAPITAL purchased aged
2 debt in the amount of \$132,028 owed by SBFM to a third party. The debt
3 note did not include a conversion clause.

4 r. On or about September 4, 2020, RB CAPITAL and SBFM amended
5 the original debt note and SBFM promised to pay RB CAPITAL a principal
6 sum of \$122,253 with a note conversion price of \$0.001, which was
7 approximately 96% discount to market.

8 s. On or about September 8, 2020, RB CAPITAL converted
9 \$13,000 of the amended debt note into 13,000,000 shares of SBFM common
10 stock at a conversion price of \$0.001.

11 t. Between on or about September 14, 2020, and on or about
12 August 19, 2021, RB CAPITAL made several loan payments to SBFM, totaling
13 over \$3.8 million, in the form of convertible notes, which RB CAPITAL
14 converted into over 28 million shares.

15 u. On October 2, 2020, BRETT emailed the CEO and CFO of
16 SBFM, copying DEBORAH, about press releases, advising them that "to make
17 sure your press releases reach the most people possible...you are going
18 to have to take a couple of extra measures." BRETT first advised that
19 "once you post your release with Accesswire, you then have to sign into
20 OTC Markets via OTCIQ access and then post it to the 'OTC Disclosure and
21 News Service.' That way it shows up on the top of the news feed page on
22 OTC Markets." Second, he advised that "in addition to Accesswire you
23 have to sign up for the Investors Hub Newswire (IHNW) so that your press
24 releases show up on iHub and under Level 2, since those are the people
25 that actually trade penny stocks. If you can start with those two things,
26 then I think you will see very positive results in the very near future."

1 v. On or about January 26, 2021, in a group WhatsApp chat
2 between BRETT, DEBORAH, and CC-2, CC-2 said, "Sold 900K SBFM with a 1.08
3 low" followed by "deb, do you want to work another 1 m with a .108 low?"
4 DEBORAH responded, "Sure." CC-2 then said, "ok you got it" followed by,
5 "we had about 3.4 mm shares as of this morning before market" and "make
6 that 3,463,377 to be exact." DEBORAH responded, "Ok sounds good. We will
7 have more shares next week!" After CC-2 said, "sweet! thing is on an
8 insane tear!", DEBORAH responded, "Yeah and some news out tomorrow.
9 Let's hold some shares for that." CC-2 responded, "you got it. i'll
10 adjust for ya" to which DEBORAH responded, "The machine that is RB" with
11 a muscle flex emoji. By the end of the trading day on January 26, 2021,
12 CC-2 told BRETT and DEBORAH they sold "2,213,377" SBFM shares that day
13 and had "1,250,000" SBFM shares left. The next day, January 27, 2021,
14 SBFM issued a press release. On the same day, RB CAPITAL sold 1,250,000
15 shares of SBFM.

16 w. In or about April 2021, BRETT posted the following on X,
17 tagging DEBORAH's X handle, assuring investors of upcoming involvement
18 on the social media platform by SBFM: "We have a call with \$sbfm this
19 afternoon and we are going to suggest more Twitter involvement and a
20 shareholder update PR that will encompass the QB uplist, mice trials,
21 future funding, etc."

22 x. On or about May 26, 2021, BRETT posted the following on
23 X: "@tonycocunho Not a single share was sold today by RB Capital. Stop
24 blaming us every time a stock goes down! How about \$sbfm is +1,500% from
25 when RB Capital got involved! But no one cares about that! Haha." On or
26

27

1 about May 26, 2021, RB CAPITAL sold approximately 600,000 shares of SBFM
2 for gross sale proceeds of approximately \$180,060.

3 y. On or about June 29, 2021, BRETT emailed the CFO of SBFM,
4 copying DEBORAH, the following: "You can have \$800k today if you go
5 along with amending the \$50,000 note to \$0.001 just like before and then
6 we will convert off ALL the other debt at \$0.30, \$0.50 and \$0.60 per
7 share. This way you will only be amending (1) note and you will not have
8 to contradict your earlier press releases about investment money from
9 RB Capital at \$0.30+ per share! I know your "lawyers" don't like it but
10 it is the cleanest way for SBFM to get the millions you need to make
11 your dreams a reality! You would also receive another \$500,000+ per
12 month from us every month!"

13 z. On or about July 6, 2021, RB CAPITAL converted a \$250,000
14 note with SBFM at \$0.01 per share, amended from \$0.30 per share, into
15 24 million shares of SBFM, which was approximately 93.3% discount to
16 market.

17 aa. On or about July 25, 2021, BRETT emailed the CEO and CFO
18 of SBFM, copying DEBORAH, urging them to create a Twitter account,
19 stating in part the following: "I cannot stress enough the importance
20 of this and the reach you get with Twitter. Furthermore, the shareholders
21 love the engagement with the Company as you are allowed to make
22 announcements and discuss other Company business openly as Twitter is
23 considered a public forum . . . A following on Twitter will also increase
24 the effectiveness of your press releases because instead of people
25 waiting for your sporadic news to sell their stock, it will make more
26 new people buy the stock! This will make the stock react more

1 appropriately when good news is released by the Company. We are happy
2 to set up another call to go over this or even set you up with a firm
3 that can help and manage all of this for you."

4 bb. On or about July 25, 2021, SBFM created a Twitter account
5 and emailed that update to BRETT and DEBORAH.

6 cc. On or about July 26, 2021, BRETT emailed the CEO and CFO
7 of SBFM, copying DEBORAH, the following: "Great work!!! Now let's put
8 out a PR officially announcing the Twitter account and urging
9 shareholders to follow @SunshineBiol to stay up to date on SBFM
10 business!" followed by a second email with the following: "Please make
11 sure 'follow' me and Deborah on Twitter as it will help to build your
12 following faster!"

13 dd. Between on or about September 11, 2020, and in or about
14 May 2023, RB CAPITAL sold a total of approximately 158,644,292 shares
15 of SBFM stock on the open market for gross sale proceeds of approximately
16 \$13,089,039.

17 ee. On or about December 27, 2023, BRETT posted the following
18 on X: @M_Bolli I couldn't agree more as I lost millions of dollars
19 because \$SBFM." By this date, BRETT and DEBORAH had gross sale proceeds
20 of \$13,089,038 from the sale of SBFM stock.

21 ISWH/BLQC

22 ff. On or about January 14, 2021, RB CAPITAL and BLQC (then
23 ISWH) entered into a funding agreement, whereby RB CAPITAL would buy
24 aged company debt, agree to amend the terms of that debt, and, after the
25 initial issuance of ISWH shares pursuant to the conversion of that debt,
26

1 make loans payments to ISWH totaling "\$3,500,000 - \$7,000,000+" in the
2 form of 500% premium to market convertible promissory notes.

3 gg. From on or about January 25, 2021, to in or about April
4 2021, RB CAPITAL purchased several aged debt notes, for a total of
5 approximately \$76,815, from the same third party, which were convertible
6 into ISWH shares at 50% discount to market. RB CAPITAL and ISWH amended
7 the notes and RB CAPITAL converted this debt into more than 21 million
8 shares at prices that were between approximately 98% and 99% discount
9 to market.

10 hh. From on or about February 3, 2021, to on or about
11 October 2, 2023, RB CAPITAL paid ISWH/BLQC over \$14 million in 24
12 installments, through either debt purchase agreements or loans, which
13 RB CAPITAL then converted into over 18 million shares.

14 ii. On or about February 4, 2021, BRETT emailed the CEO of
15 ISWH, copying DEBORAH, directing ISWH to pay a \$26,000 bill to a
16 promoter.

17 jj. On or about July 12, 2021, ISWH issued a press release
18 announcing, "it has secured (and already received) \$8 million in funding
19 from California-based RB Capital Partners, Inc. ("RB Capital") for
20 investment and development in the Company's cryptocurrency mining and
21 telehealth operations . . . in the form of a premium-to-market
22 convertible note that can only convert at a premium (\$1.50 per share)
23 to the stock's current price (~\$0.41 per share) and only after 12
24 months."

25 kk. On or about August 24, 2022, BRETT posted the following
26 on X: "@JohnSmi27871922 @Linkudann @Wildboarhog0 @PatGallagher19

27

1 @blockquarryco @bit5ive I didn't say I never sold any shares! You are
2 taking part of a sentence out of context. Of course since March 2021 I
3 have sold shares. I said I haven't sold a single share since January of
4 this year! I still hold millions of shares of \$BLQC right now!" Between
5 on or about May 13, 2022, and on or about July 19, 2022, RB CAPITAL sold
6 approximately 353,334 shares of BLQC for gross sale proceeds of
7 approximately \$137,820.

8 11. On or about August 23, 2023, BRETT posted the following
9 on X: @Linkudann @blockquarryco As usual I'm the one to blame. Of course
10 I have sold some shares of \$BLQC from time to time over the past few
11 years but I have not dumped them into the market or sold them in manner
12 that harmed the share price, nor was I ever any considerable percentage
13 of the daily trading..." Between on or about February 4, 2021, and on or
14 about August 23, 2023, RB CAPITAL sold approximately 28,822,152 shares
15 of BLQC for gross sale proceeds of approximately \$13,280,236. On or
16 about July 31, 2023, RB CAPITAL was approximately 77% of the daily
17 trading volume of BLQC.

18 mm. On or about August 31, 2023, BRETT posted the following
19 on X: "@ZoranBogdanovs4 I keep on investing in \$BLQC because if they
20 don't have money to operate and pivot their business operations, then
21 there won't be any business operations! Basically \$BLQC is too big for
22 me to fail as it is my single largest investment and most of it is NOT
23 convertible debt!..." As of this date, RB CAPITAL had five outstanding
24 convertible debt notes with BLQC.

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1 nn. Between on or about February 4, 2021, to in or about July
2 2024, RB CAPITAL sold approximately 38,492,293 million shares of
3 ISWH/BLQC for gross sale proceeds of approximately \$13,862,912.

4 SIRC

5 oo. On or about January 23, 2021, RB CAPITAL and SIRC entered
6 into a funding agreement, whereby RB CAPITAL would buy aged company
7 debt, agree to amend the terms of that debt, and, after the initial
8 issuance of SIRC shares pursuant to the conversion of that debt, make
9 loan payments to SIRC totaling "\$3,500,000 - \$11,500,000+" in the form
10 of 500% premium to market convertible promissory notes.

11 pp. On or about January 29, 2021, RB CAPITAL purchased aged
12 debt in the amount of \$13,800, owed by SIRC to a third party, which was
13 convertible into SIRC shares at 25% discount to market.

14 qq. On or about February 2, 2021, RB CAPITAL and SIRC amended
15 the note and RB CAPITAL converted the debt into 13,800,000 million shares
16 of SIRC at \$0.001 per share, which was approximately 99% discount to
17 market.

18 rr. On or about February 2, 2021, BRETT emailed CC-2 and the
19 director of an offshore brokerage holding RB CAPITAL's SIRC stock,
20 copying DEBORAH, the following: "Please get the attached deposit of
21 13,800,000 shares of SIRC into our account with CIBC. The stock has tons
22 of volume and the 13,800,000 shares have a current market value of
23 roughly \$10,000,000 that we can sell over the course of 10-12 trading
24 days!"

25 ss. On or about February 3, 2021, BRETT posted the following
26 on X: "Anyone looking for a good solar/EV stock should check out \$sirc

1 as they are making big moves and going on an acquisition spree! \$sirc
2 \$opti \$sbfm." Between on or about February 8, 2021, and on or about
3 March 15, 2021, RB CAPITAL sold 13,800,000 shares for gross sale proceeds
4 of \$21,028,031.

5 tt. From on or about February 8, 2021, to on or about
6 November 16, 2023, RB CAPITAL paid SIRC over \$15 million in 21
7 installments, through either debt purchase agreements or loans, which
8 RB CAPITAL converted into over 2 billion shares.

9 uu. On or about August 24, 2022, BRETT posted the following
10 on X: "I can assure you that I want nothing more than for \$SIRC to go
11 back to \$3+ and I will NOT do anything to stand in the way! I am NOT
12 Tony! #RBCapital will NOT be dumping any shares into the open market!
13 Our goal is to reduce the debt and help \$SIRC uplist to the #Nasdaq."
14 Between on or about August 25, 2022, and on or about August 31, 2022,
15 RB CAPITAL sold approximately 4,654,091 shares of SIRC for gross sale
16 proceeds of approximately \$1,386,647.

17 vv. On or about August 24, 2022, BRETT posted the following
18 on X: "@523Investments @daveakpac @ggORGoldengod @SIRCStock I also would
19 never issue a variable rate note as those are not exactly kosher! \$SIRC."
20 On or about April 8, 2022, RB CAPITAL converted a promissory note with
21 SIRC into approximately 7,559,285 shares of SIRC at \$0.14 per share,
22 amended from \$3.00 per share as stated in the promissory note. On or
23 about July 18, 2022, RB CAPITAL converted a promissory note with SIRC
24 into approximately 25,074,285 shares of SIRC at \$0.07 per share, amended
25 from \$3.00 per share as stated in the promissory note.

26

27

1 ww. On or about February 6, 2023, SIRC issued a press release,
2 wherein it announced it had secured a new \$10 million revolving credit
3 facility with a top four national bank. This assertion was false, in
4 that no such agreement had been secured. Conversations in or about
5 February 2023, through in or about March 2023, between BRETT, CC-1, and
6 PERSON A reflected their knowledge that SIRC had not received the credit
7 facility that it had announced in the February 6, 2023 press release.

8 xx. On or about March 28, 2023, BRETT emailed with CC-1 and
9 other management at SIRC in an email chain with subject line, "SIRC -
10 Conversion documents - 40m shares - April 3, 2023 - RB Capital." In the
11 email chain, BRETT submitted conversion documents to CC-1 and other
12 management, and stated, "...it is better to have this conversion happen
13 in Q2 so no one sees it until your next filing!"

14 yy. In or about April 2023, BRETT appeared on a YouTube show
15 and discussed his close relationship with CC-1, and stated that SIRC was
16 "too big to fail" because of the amount of capital RB CAPITAL had
17 provided to the company.

18 zz. On or about May 23, 2023, BRETT messaged CC-1 the
19 following on WhatsApp: "Twitter is extremely important to your stock as
20 is discord!!!"

21 aaa. On or about August 18, 2023, BRETT posted the following
22 on X: @BasileEsq @whisskier @Adrian_mxli The only way to do it
23 legitimately so it works is with fixed price promissory notes, that
24 preferably convert at a premium to the trading price at the time of
25 issuance! Variable rate loans of any kind are basically the beginning
26 of the end for almost all companies. \$SIRC \$ILUS..." Between on or about

1 converted it into a total of 250 million shares at \$0.001 per share,
2 which was approximately 97% discount to market.

3 ggg. Between on or about October 25, 2021, and on or about
4 July 12, 2022, RB CAPITAL made five loan payments to CYBL for a total
5 of approximately \$5,250,000.

6 hhh. On or about October 26, 2021, CYBL issued a press release
7 announcing it had secured \$4,500,000 in funding from RB CAPITAL
8 structured "as a premium-to-market fixed-price convertible note that can
9 only convert to common stock at \$0.25 per share, a significant premium
10 to the stock's current price of ~\$0.046 per share . . . Additionally,
11 RB Capital is prepared to provide up to an additional \$10,500,000 in
12 further funding on the same terms as the share price continues to reflect
13 Cyberlux Corporation's growth."

14 iii. On or about May 27, 2022, RB CAPITAL purchased aged debt
15 in the amount of \$250,000 owed by CYBL to a third party ("7/26/2018 debt
16 note"). The debt note did not include a conversion clause.

17 jjj. On or about July 12, 2022, RB CAPITAL and CYBL amended
18 the 7/26/2018 debt note and RB CAPITAL converted it into 200 million
19 shares at \$0.0013 per share, which was approximately 88% discount to
20 market.

21 kkk. In or about December 2022, BRETT appeared on a YouTube
22 show with the CEO of CYBL and discussed RB CAPITAL's "very long term"
23 investments in companies like CYBL.

24 lll. On or about February 18, 2023, BRETT posted the following
25 on X: "@my2hands @CyberluxC @MDSAdvisor I NEVER dumped the shares into
26 the market so I don't see how any of this is relevant. Go look at the

1 volume charts and you will see i couldn't possibly have sold in that
2 short time period. I have invested millions in \$CYBL and have done
3 absolutely nothing to hurt the company!"

4 mmm. On or about June 1, 2023, BRETT posted the following on
5 X: "@JulieDaGirl @SECGov @FINRA @CyberluxC @MDSAdvisor Another cry baby.
6 I haven't sold a single share of \$CYBL! And I never "received" any
7 shares, I paid millions of dollars for them. Once again get your facts
8 straight little girl."

9 nnn. Between on or about October 25, 2021, and on or about
10 November 29, 2022, RB CAPITAL sold approximately 450 million shares of
11 CYBL for gross sale proceeds of approximately \$11,568,081.

12 ILUS

13 ooo. On or about September 24, 2021, CC-2 sent an email to
14 BRETT and DEBORAH about "potential deals," in which he described ILUS
15 as the following, in part: "This issuer has been pounded by toxic lenders
16 for years . . . they will most likely not be able to convert notes for
17 quite some time."

18 ppp. On or about December 1, 2021, CC-2 emailed BRETT and
19 DEBORAH about ILUS, and stated, in part: "The issuer just announced
20 plans to uplist to Nasdaq, but as we know, is unable to do so if recording
21 toxic debt on their books . . . The issuer has nearly \$10M in outstanding
22 debt. This one still looks promising. The price has picked up
23 significantly since September, jumping from \$0.11 to roughly \$0.40 per
24 share for the last couple months. On average, this will trade 13,28M
25 shares per day, or roughly \$5M USD per day."

26

27

1 qqq. In or about January 2022, RB CAPITAL entered into a
2 funding agreement with ILUS, whereby RB CAPITAL would buy aged company
3 debt, agree to amend the terms of that debt, and, after the initial
4 issuance of ILUS shares pursuant to the conversion of that debt, make
5 loan payments to ILUS totaling "\$6,000,000 - \$14,000,000+" in the form
6 of 500% premium to market convertible promissory notes.

7 rrr. From on or about January 28, 2022, to on or about
8 October 17, 2022, RB CAPITAL purchased three aged debt notes, for a
9 total of approximately \$1,500,000, owed by ILUS to the same third party,
10 which were convertible into ILUS shares at 25% discount to market. RB
11 CAPITAL and ILUS amended the notes and RB CAPITAL converted this debt
12 into approximately 160,550,000 shares at \$0.01 per share, which was
13 between 80% to 92% discount to market.

14 sss. From on or about January 28, 2022, to on or about
15 October 11, 2024, RB CAPITAL paid ILUS approximately \$9,215,742 in
16 thirty-one (31) installments, through either debt purchase agreements
17 or loans.

18 ttt. On or about February 15, 2022, ILUS issued a press release
19 announcing funding from RB CAPITAL, stating: "RB Capital, is a well-
20 known and reputable financier in the OTC and public markets. The company
21 is known for partnering with emerging companies and supporting them to
22 refinance on better terms, remove historic toxic debt, and strengthen
23 their balance sheets." The press release also included the following
24 quote from BRETT: "After meeting with the leadership of ILUS and
25 conducting our due diligence, it became clear that this was a company
26 we wanted to invest in. We invest in people and their teams, and Nick

1 is the type of leader we believe can move the company forward with the
2 right capital behind him."

3 uuu. On or about May 28, 2022, BRETT posted the following on
4 X: "@PennyStockLane @VentingDumb @ILUS_INTL That note is one of the
5 toxic notes #RBCapital bought from GPL. The toxic terms were removed and
6 the note isn't even on the \$ILUS books anymore, hence \$500k reduction
7 of harmful toxic debt. ALL of the #RBCapital notes are fixed conversion
8 prices with no ratchet clauses!" By this date, RB CAPITAL had purchased
9 its first ILUS aged debt note, the original terms of which included a
10 conversion rate at 25% discount to market, but which RB CAPITAL converted
11 at \$0.01 per share, which was 92% discount to market.

12 vvv. On or about July 14, 2022, BRETT posted the following on
13 X: "@igal_n @JimmytheRippee @GeorgeASharp This doesn't even know what a
14 toxic loan is! A toxic loan is a variable rate death spiral whereby the
15 holder has no real risk because the conversion price keeps decreasing
16 if the pps drops! Show me where #RBCapital issued that type of note to
17 \$ILUS or any other company!" RB CAPITAL converted its notes with ILUS
18 from \$0.01 per share to as low as \$0.0012 share.

19 www. On or about August 31, 2023, PERSON A engaged in a
20 consensually recorded WhatsApp call with the CEO of ILUS, who stated,
21 in part, that BRETT's model was to do a note at \$0.50 per share conversion
22 price in exchange for funding the company and that when the company
23 wanted more money, the CEO and BRETT would perform an adjustment on the
24 conversion price to 1, 2 or 5 cents in exchange for BRETT giving the
25 company more money. The CEO stated that BRETT's notes at \$0.50 per share
26 created a "better picture" for BRETT and ILUS because if the ILUS share

27

1 price was lower, it would seem to the market that BRETT could not convert
2 because he had a higher conversion price.

3 xxx. On or about February 2, 2024, BRETT posted the following
4 on X: "Today's 50m share conversion of \$ILUS was done by #RBCapital. We
5 have absolutely no intentions of dumping the shares into the market or
6 harming the share price in any way. \$ILUS cancels \$200k of debt and is
7 provided an additional \$600k of operating capital to get over the..." On
8 or about February 2, 2024, RB CAPITAL sold approximately 2,980,000 shares
9 of ILUS for gross sales proceeds of approximately \$50,154. Between on
10 or about February 5, 2024, and on or about February 9, 2024, RB CAPITAL
11 sold approximately 8,515,000 shares of ILUS for gross sale proceeds of
12 approximately \$135,375.

13 yyy. Between in or about May 2022, and on or about October 11,
14 2024, RB CAPITAL sold approximately 613,141,789 shares of ILUS for
15 approximately \$16,628,317 in gross sale proceeds.

16 All in violation of Title 18, United States Code, Section 371.

17 Count 2 - Securities Fraud

18 1. The allegations set forth in paragraphs 1 through 15 are re-
19 alleged as if fully set forth herein.

20 2. Beginning on a date unknown to the grand jury but no later
21 than August 10, 2020, and continuing until on or about October 14, 2024,
22 within the Southern District of California and elsewhere, defendants
23 BRETT DAVID ROSEN, aka Brett Hackspacher, and DEBORAH RACHEL ROSEN, aka
24 Deborah Rachel Braun, did knowingly and willfully, directly and
25 indirectly, by the use of the means and instrumentalities of interstate
26 commerce and of the mails, use and employ manipulative and deceptive

1 devices and contrivances in connection with the purchase and sale of
2 securities, in violation of Title 17, Code of Federal Regulations,
3 Section 240.10b-5, by (a) employing devices, schemes and artifices to
4 defraud, (b) making and causing to be made untrue statements of material
5 fact, and omitting to state material facts necessary in order to make
6 the statements made, in light of the circumstances under which they were
7 made, not misleading, and (c) engaging in acts, practices, and courses
8 of business which operated and would operate as a fraud and deceit upon
9 any persons, including members of the investing public and sellers and
10 purchasers of securities of (1) Optec International, Inc. (OPTI),
11 (2) Sunshine Biopharma, Inc. (SBFM), (3) BlockQuarry Corp. (BLQC),
12 formerly known as ISW Holdings, Inc. (ISWH), (4) Solar Integrated Roofing
13 Corp. (SIRC), (5) Cyberlux Corp. (CYBL), (6) Ilustrato Pictures
14 International Inc. (ILUS).

15 3. Paragraphs 16 through 20 of Count 1 are realleged and
16 incorporated by reference as more fully describing the manipulative and
17 deceptive devices and contrivances used in connection with the purchase
18 and sale of securities.

19 All in violation of Title 15, United States Code, Sections 78j(b), 78ff,
20 and Title 17, Code of Federal Regulations, Section 240.10b-5.

21 Count 3 - Conspiracy to Launder Monetary Instruments

22 (18 U.S.C. § 1956(h))

23 1. Paragraphs 1 through 15 are re-alleged as if fully set forth
24 herein.

25 2. Beginning on a date unknown to the grand jury but no later
26 than August 10, 2020, and continuing up to and including at least

27

1 October 14, 2024, within the Southern District of California and
2 elsewhere, defendants BRETT DAVID ROSEN, aka Brett Hackspacher, DEBORAH
3 RACHEL ROSEN, aka Deborah Rachel Braun, and RB CAPITAL PARTNERS, INC.
4 did knowingly conspire together and with others known and unknown to the
5 grand jury to commit offenses against the United States in violation of
6 Title 18, United States Code, Sections 1956 and 1957, to wit:

7 a. to conduct a financial transaction affecting interstate
8 and foreign commerce, which involved the proceeds of a specified unlawful
9 activity, that is securities fraud, with the intent to promote the
10 carrying on of the specified unlawful activity, knowing that the property
11 involved in the financial transactions represented the proceeds of some
12 form of unlawful activity, in violation of Title 18, United States Code,
13 Section 1956(a)(1)(A)(i);

14 b. to knowingly conduct and attempt to conduct financial
15 transactions affecting interstate and foreign commerce, which involved
16 the proceeds of specified unlawful activity, that is, securities fraud,
17 knowing that the transactions were designed in whole or in part to
18 conceal and disguise the nature, location, source, ownership, and
19 control of the proceeds of specified unlawful activity, and that while
20 conducting and attempting to conduct such financial transactions, knew
21 that the property involved in the financial transactions represented the
22 proceeds of some form of unlawful activity, in violation of Title 18,
23 United States Code, Section 1956(a)(1)(B)(i); and

24 c. to knowingly engage and attempt to engage in monetary
25 transactions, by, through, and to a financial institution, affecting
26 interstate and foreign commerce, in criminally derived property of a

1 value greater than \$10,000, such property having been derived from a
 2 specified unlawful activity, that is, securities fraud; in violation of
 3 Title 18, United States Code, Section 1957.

4 All in violation of Title 18, United States Code, Section 1956(h).

5 Counts 4 through 24 - Money Laundering

6 (18 U.S.C. § 1957)

7 1. The allegations set forth in paragraphs 1 through 15 are re-
 8 alleged as if fully set forth herein.

9 2. On or about the dates listed below, within the Southern
 10 District of California and elsewhere, defendants BRETT DAVID ROSEN, aka
 11 Brett Hackspacher, and DEBORAH RACHEL ROSEN, aka Deborah Rachel Braun,
 12 did knowingly engage and attempt to engage in a monetary transaction by,
 13 through, and to a financial institution, affecting interstate and
 14 foreign commerce, in criminally derived property of a value greater than
 15 \$10,000, that is, deposit, withdrawal, and transfer of funds as listed
 16 below, such property having been derived from a specified unlawful
 17 activity, that is, securities fraud.

Count	Approximate Date	Transaction
4	April 19, 2021	\$118,500.00 cashier's check withdrawal from Wells Fargo Account #4176 to David and Sons in La Jolla, California
5	May 3, 2021	\$6,937,409.69 wire transfer from Wells Fargo Account #4176 to Pickford Escrow Company, Inc.
6	November 19, 2021	\$3,000,000.00 wire transfer from BMO Global Asset Management Trust and Custody Services Account #1956 to Wells Fargo Account #4176

Count	Approximate Date	Transaction
7	December 22, 2021	\$750,000.00 wire transfer from BMO Global Asset Management Trust and Custody Services Account #1956 to Wells Fargo Account #4176
8	December 29, 2021	\$250,000.00 cashier's check withdrawal from Wells Fargo Account #4176 to Deborah Rosen deposited in JP Morgan Chase Account #2674
9	May 5, 2022	\$165,000.00 wire transfer from Alpine Securities Account #2571 to Wells Fargo Account #4176
10	August 29, 2022	\$100,000.00 cashier's check withdrawal from Wells Fargo Account #4176 to Deborah Rosen and deposited in JP Morgan Chase Account #2674
11	October 12, 2022	\$900,000.00 bank transfer from JP Morgan Chase Account #2674 to JP Morgan Chase Account #0803
12	October 14, 2022	\$1,000,000.00 wire transfer from JP Morgan Chase Account #0803 to ETrade Account #6141
13	October 24, 2022	\$121,757.00 check withdrawal from Wells Fargo Account #4176 to David and Sons Fine Jewelers in La Jolla, California
14	November 30, 2022	\$120,000.00 wire transfer from Wells Fargo Account #4176 to Rocks on Clocks LLC
15	March 6, 2023	\$84,876.13 cashier's check withdrawal from Wells Fargo Account #4176 to Land Rover San Diego
16	April 27, 2023	\$3,000,000.00 bank transfer from JP Morgan Chase Account #2674 to JP Morgan Securities Account #4426
17	June 14, 2023	\$1,000,000.00 bank transfer from JP Morgan Securities Account #4426 to JP Morgan Securities Account #5852
18	July 26, 2023	\$1,000,000.00 wire transfer from Wells Fargo Account #4176 to Bank of America Account #3757
19	February 14, 2024	\$1,859,073.52 bank transfer from JP Morgan Securities Account #4426 to JP Morgan Securities Account #5853

Count	Approximate Date	Transaction
20	March 1, 2024	\$240,000.00 wire transfer from Vision Financial Markets Account #0907 to Bank of America Account #3757
21	March 19, 2024	\$150,000.00 transfer from ETrade Account #6141 to ETrade Account #6208
22	June 21, 2024	\$82,000.00 wire transfer from Vision Financial Markets Account #0907 to Bank of America Account #3757
23	January 10, 2025	\$45,000.00 wire transfer from Vision Financial Markets Account #0907 to Bank of America Account #3757
24	January 14, 2025	\$50,000 wire transfer from Bank of America Account #3757 to CalPrivate Bank Account #1205

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

FORFEITURE ALLEGATIONS

1. The allegations contained above are re-alleged and incorporated by reference for the purpose of alleging forfeiture to the United States pursuant to Title 18, United States Code, Sections 981(a)(1)(C) and 982(a)(1), and Title 28, United States Code, Section 2461(c).

2. Upon conviction of one and more of the offenses set forth in Counts 1 and 2, defendants BRETT DAVID ROSEN, aka Brett Hackspacher, and DEBORAH RACHEL ROSEN, aka Deborah Rachel Braun, shall forfeit, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c) any property, real and personal, constituting and derived from proceeds traceable to such offenses. The properties to be forfeited include, but are not limited to:

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- 1 a. The real property located at:
2 8560 Avenida De Las Ondas
3 La Jolla, CA 92037
4 Parcel Number 346-110-05-00
5
6 More particularly described as:
7 Lot Number 17; Subdivision: La Jolla Shores Terrace;
8 District: 0020; Tract: 2996; City/Muni/Twnsp: San Diego;
9 Map: 002996
- 10 b. all monies, funds and credits found in and attributable
11 to Bank of America Account #3757
- 12 c. all monies, funds and credits found in and attributable
13 to Bank of America Account #3854
- 14 d. all monies, funds and credits found in and attributable
15 to Bank of America Account #4774
- 16 e. all monies, funds and credits found in and attributable
17 to CalPrivate Back Account #3924
- 18 f. all monies, funds and credits found in and attributable
19 to CalPrivate Back Account #8215
- 20 g. all monies, funds and credits found in and attributable
21 to JP Morgan Chase Account #2674
- 22 h. all monies, funds and credits found in and attributable
23 to JP Morgan Chase Account #0803
- 24 i. all monies, funds and credits found in and attributable
25 to ETrade Account #6-208
- 26 j. all monies, funds and credits found in and attributable
27 to Vision Financial Markets Account #0907
- k. all monies, funds and credits found in and attributable
to Alpine Securities/Scottsdale Capital Advisors Account
#2571

1 l. all monies, funds and credits found in and attributable
2 to Pacific Premier Bank Account #1207

3 m. all monies, funds and credits found in and attributable
4 to ETrade Account #6141

5 3. Upon conviction of one and more of the offenses set forth in
6 Counts 3 through 24, defendants BRETT DAVID ROSEN, aka Brett Hackspacher,
7 DEBORAH RACHEL ROSEN, aka Deborah Rachel Braun, and RB CAPITAL PARTNERS,
8 INC., pursuant to Title 18, United States Code, Section 982(a)(1), shall
9 forfeit to the United States any property, real and personal, involved
10 in the offenses, and all property traceable to such property. The
11 property to be forfeited includes, but is not limited to:

12 a. The real property located at:
13 8560 Avenida De Las Ondas
14 La Jolla, CA 92037
15 Parcel Number 346-110-05-00

16 More particularly described as:
17 Lot Number 17; Subdivision: La Jolla Shores Terrace;
18 District: 0020; Tract: 2996; City/Muni/Twnsp: San Diego;
19 Map: 002996

20 b. all monies, funds and credits found in and attributable
21 to Bank of America Account #3757

22 c. all monies, funds and credits found in and attributable
23 to Bank of America Account #3854

24 d. all monies, funds and credits found in and attributable
25 to Bank of America Account #4774

26 e. all monies, funds and credits found in and attributable
27 to CalPrivate Back Account #3924

 f. all monies, funds and credits found in and attributable
 to CalPrivate Back Account #8215

- 1 g. all monies, funds and credits found in and attributable
- 2 to JP Morgan Chase Account #2674
- 3 h. all monies, funds and credits found in and attributable
- 4 to JP Morgan Chase Account #0803
- 5 i. all monies, funds and credits found in and attributable
- 6 to ETrade Account #6-208
- 7 j. all monies, funds and credits found in and attributable
- 8 to Vision Financial Markets Account #0907
- 9 k. all monies, funds and credits found in and attributable
- 10 to Alpine Securities/Scottsdale Capital Advisors Account
- 11 #2571
- 12 l. all monies, funds and credits found in and attributable
- 13 to Pacific Premier Bank Account #1207
- 14 m. all monies, funds and credits found in and attributable
- 15 to ETrade Account #6141

16 4. If any of the forfeitable property described above in
17 Paragraphs 2 and 3, as a result of any act or omission of the defendants:

- 18 a. cannot be located upon the exercise of due diligence;
- 19 b. has been transferred or sold to, or deposited with, a
- 20 third party;
- 21 c. has been placed beyond the jurisdiction of the Court;
- 22 d. has been substantially diminished in value; or
- 23 e. has been commingled with other property which cannot be
- 24 subdivided without difficulty;

25 //

1 it is the intent of the United States, pursuant to Title 21, United
2 States Code, Section 853(p), as incorporated by Title 28, United States
3 Code, Section 2461(c), and Title 18, United States Code, Section 982(b),
4 to seek forfeiture of any other property of the defendants up to the
5 value of the forfeitable property described above in Paragraphs 2 and 3.
6 All pursuant to Title 18, United States Code, Sections 981(a)(1)(C) and
7 982(a)(1), and Title 28, United States Code, Section 2461(c).

8 DATED: January 16, 2026.

9 A TRUE BILL:

10
11
12 ADAM GORDON
13 United States Attorney

14
15 By: _____

16 JANAKI G. CHOPRA
17 JOSEPH S. SMITH
Assistant U.S. Attorneys