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FILED IN THE  
U.S. DISTRICT COURT  
EASTERN DISTRICT OF WASHINGTON

DEC 17 2014

SEAN F. McAVOY, CLERK  
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SPOKANE, WASHINGTON

10 UNITED STATES DISTRICT COURT  
11 EASTERN DISTRICT OF WASHINGTON

12 UNITED STATES OF AMERICA,

13 Plaintiff,

14 vs.

15 ERICK HALKIER HANSEN,  
16 SEAN MICHAEL BORZAGE BOYD,  
17 a/k/a "Sean Michael"  
18 a/k/a "Sean Michael Borzage"  
19 a/k/a "Sean Boyd"

20 Defendants.

Case No.: **2:14-CR-184-TOR**

INDICTMENT

Vio. 18 U.S.C. § 1349  
Conspiracy to Commit Mail Fraud  
and Wire Fraud (Count 1)

Vio. 18 U.S.C. § 1341  
Mail Fraud (Count 2)

Vio. 18 U.S.C. § 1343  
Wire Fraud (Counts 3-16)

Forfeiture Allegations  
18 U.S.C. § 981 and 28 U.S.C.  
§ 2461

21 The Grand Jury charges:

22 **General Allegations**

23 At all times material to this Indictment:

24 1. Defendant ERICK HALKIER HANSEN ("HANSEN") was the founder,  
25 President, and CEO of BlueStar Digital Technologies, Inc. ("BlueStar") and other  
26  
27  
28

1 related business entities. From on or about October 1, 2010, to on or about January 1,  
2 2014, Defendant HANSEN resided at various times in Spokane, Washington in the  
3 Eastern District of Washington and in California and New Mexico. At all times  
4 relevant to this Indictment, Defendant HANSEN's principal source of income was  
5 from BlueStar.

6 2. Defendant SEAN MICHAEL BORZAGE BOYD, a/k/a "Sean Michael,"  
7 a/k/a "Sean Michael Borzage," and a/k/a "Sean Boyd" ("BOYD") was the Senior  
8 Executive Vice President and, at varying times from on or about October 1, 2010, to  
9 on or about January 1, 2014, the VP of Global Development, for BlueStar. Defendant  
10 BOYD's primary role from on or about October 1, 2010, to on or about January 1,  
11 2014, was to solicit investments funds on behalf of BlueStar. At all times relevant to  
12 this Indictment, Defendant BOYD resided at various times in Utah and Nevada. From  
13 on or about October 1, 2010, to on or about January 1, 2014, Defendant BOYD  
14 received from between 10% and 20% in commission payments per investment that he  
15 solicited for BlueStar for a total of approximately \$450,000 in commissions paid from  
16 BlueStar accounts.

17 3. Blu-ray Discs are a digital optical disc data storage format for the high  
18 volume storage of high definition video and uncompressed surround sound. The Blu-  
19 ray Disc format was designed to supersede the prior DVD digital storage format.

20 4. At all times relevant to this Indictment, BlueStar was a Nevada  
21 corporation formed on May 5, 2009, that had a principal business address in Spokane,  
22 Washington. At all times relevant to this Indictment, BlueStar maintained a purported  
23 office and Blu-ray Disc replication facility (the "Facility") at 1119 W. First, Spokane,  
24 Washington 99201 as its principal place of business. At all times relevant to this  
25 Indictment, Defendant HANSEN, Defendant BOYD, and others known and unknown,  
26 maintained that BlueStar's business was to replicate Blu-ray Discs on a commercial  
27 scale at the BlueStar's Facility in Spokane, Washington. From on or about January 1,  
28 2007, to on or about January 1, 2014, it appears that BlueStar's revenue related to Blu-



1 ray Disc replication and related activities at the Facility was less than \$500,000 for the  
2 entire time period.

3 5. From on or about January 2007 to on or about October 1, 2010,  
4 Defendant HANSEN and others known and unknown solicited funds totaling  
5 approximately \$7.6 million for investment in BlueStar stock and BlueStar generally  
6 from approximately 200 investors. From on or about October 1, 2010, to on or about  
7 January 1, 2014, Defendant HANSEN, Defendant BOYD, and others known and  
8 unknown, solicited additional funds totaling approximately \$2.8 million for  
9 investments in BlueStar stock and BlueStar generally from approximately 42  
10 investors. At all times relevant to this Indictment, Defendant HANSEN, Defendant  
11 BOYD, and others known and unknown, told people who invested in BlueStar that all  
12 of the funds raised from investors were to benefit BlueStar's business. Among the  
13 people Defendant HANSEN, Defendant BOYD, and others known and unknown,  
14 solicited funds from for BlueStar from on or about October 1, 2010, to on or about  
15 January 1, 2014, were the following persons identified by their initials and place of  
16 residence and known collectively as the "BlueStar Investors":

Name	Residence
R.C.	Side Lake, Minnesota
P.D.	Arvada, Colorado
E.F.	Golden, Colorado
M.L.	Glendale, Arizona
A.P.	San Antonio, Texas
K.P.	Kapolei, Hawaii
A.S.	Rochester, New York
Y.S.	Beverly Hills, California
G.V.	Mission Viejo, California
M.B.	Decatur, Alabama

26 6. The Blu-ray Disc Association ("BDA") is an industry consortium that  
27 developed and licensed Blu-ray Disc technology and is responsible for establishing  
28

1 and issuing the licensing agreements needed to use the Blu-ray Disc format,  
2 specifications, and logos in the manufacture, replication, and sale of Blu-ray Disc  
3 media. On or about April 10, 2008, HANSEN made a written inquiry to the BDA  
4 about obtaining a license to manufacture discs using Blu-ray technology. BlueStar did  
5 not obtain the necessary licenses from BDA to use the Blu-ray Disc format,  
6 specifications, and logos in the manufacture, replication, and sale of Blu-ray Disc  
7 media until September 27, 2012.

8 **Purpose of the Scheme and Artifice**

9 7. From on or about October 1, 2010, and continuing to on or about January  
10 1, 2014, in Spokane, Washington, in the Eastern District of Washington, and  
11 elsewhere, Defendant HANSEN, Defendant BOYD, and others known and unknown,  
12 devised and intended to devise a scheme to defraud the BlueStar Investors, to include  
13 R.C., P.D., E.F., M.L., A.P., K.P., A.S., Y.S., G.V., M.B., as well as other individuals,  
14 and to obtain money and property from the BlueStar Investors by means of materially  
15 false and fraudulent pretenses, representations, and promises made to the BlueStar  
16 Investors.

17 **Manner and Means**

18 8. Defendant HANSEN and Defendant BOYD, and others known and  
19 unknown, used the following manner and means, among others, to accomplish the  
20 scheme and artifice alleged in this Indictment from on or about October 1, 2010,  
21 through on or about January 1, 2014:

22 9. It was part of the scheme and artifice that Defendant HANSEN,  
23 Defendant BOYD, and others known and unknown, made and caused to be made  
24 interstate telephone calls and other interstate electronic communications, including  
25 e-mail communications, to communicate materially false and fraudulent pretenses,  
26 representations, and promises about the business capacity of BlueStar and business  
27 opportunities available to BlueStar to BlueStar Investors R.C., P.D., E.F., M.L., A.P.,  
28 K.P., A.S., Y.S., G.V., M.B., and other individuals, and to solicit money from these



1 BlueStar Investors based on materially false and fraudulent pretenses,  
2 representations, and promises.

3 10. It was part of the scheme and artifice that Defendant HANSEN,  
4 Defendant BOYD, and others known and unknown, caused BlueStar Investors R.C.,  
5 P.D., E.F., M.L., A.P., K.P., A.S., Y.S., G.V., and M.B., and other individuals, to  
6 transfer money via interstate wire transfer to bank accounts in Spokane, Washington,  
7 held in the name of BlueStar, based on materially false and fraudulent pretenses,  
8 representations, and promises about the business capacity of BlueStar and business  
9 opportunities available to BlueStar made by Defendant HANSEN, Defendant BOYD,  
10 and others known and unknown.

11 11. It was part of the scheme and artifice that Defendant HANSEN,  
12 Defendant BOYD, and others known and unknown, caused BlueStar Investor M.L. to  
13 make and use the United States mails and private commercial interstate carriers to  
14 send money for deposit in bank accounts held in the name of BlueStar in Spokane,  
15 Washington, based on materially false and fraudulent pretenses, representations, and  
16 promises about the business capacity of BlueStar and business opportunities available  
17 to BlueStar made by Defendant HANSEN, Defendant BOYD, and others known and  
18 unknown.

19 12. It was part of the scheme and artifice that Defendant HANSEN,  
20 Defendant BOYD, and others known and unknown, falsely represented, and caused  
21 to be represented, to BlueStar Investors R.C., P.D., E.F., M.L., A.P., K.P., A.S., Y.S.,  
22 G.V., and M.B., and other individuals, that money obtained from the BlueStar  
23 Investors would be used for business purposes, including to purchase equipment and  
24 for other expenses necessary to make the Facility in Spokane, Washington  
25 operational, whereas, in truth and in fact, investors' funds were used primarily for  
26 other purposes not authorized and not disclosed to investors, including personal and  
27 living expenses, debts, and commissions associated with Defendant HANSEN,  
28 Defendant BOYD, and others known and unknown.

1           13. It was part of the scheme and artifice that Defendant HANSEN,  
2 Defendant BOYD, and others known and unknown, created a company website,  
3 published company newsletters, and created company videos for BlueStar which  
4 contained information they knew to be false and misleading about the business  
5 capacity of BlueStar and business opportunities available to BlueStar in an attempt to  
6 assuage BlueStar Investors' concerns and doubts about BlueStar and to encourage  
7 BlueStar Investors to provide additional money to BlueStar.

8                           Celebrity Footage Contract

9           14. It was part of the scheme and artifice that on or about November 3, 2010,  
10 and continuing to on or about January 31, 2011, Defendant HANSEN communicated  
11 to numerous BlueStar Investors, including M.B., K.P., R.C., M.L., and G.V., through  
12 the means of interstate communications, including telephone calls and e-mail  
13 communications, that BlueStar had a contract for the exclusive distribution rights to  
14 video footage of a recently deceased celebrity (the "Celebrity Footage") and that  
15 BlueStar would replicate large numbers of Blu-ray Discs containing the Celebrity  
16 Footage for profit, whereas in truth and in fact, Defendant HANSEN, Defendant  
17 BOYD and others known and unknown, knew that: 1) BlueStar, was not capable of  
18 replicating large numbers of Blu-ray Discs at the Facility and therefore could not  
19 perform under the contract regarding the Celebrity Footage; and, 2) BlueStar took no  
20 meaningful steps to undertake any production or distribution of the Celebrity Footage  
21 on Blu-ray Discs and could not take any such steps.

22           15. It was part of the scheme and artifice that on or about November 3, 2010,  
23 Defendant HANSEN signed a contract (the "Celebrity Footage Contract") on behalf  
24 of BlueStar with a media company to replicate and distribute the Celebrity Footage.  
25 Consistent with Celebrity Footage Contract, BlueStar paid \$50,000 in two  
26 installments in November and December 2010 for the Celebrity Footage but, even  
27 though BlueStar obtained the Celebrity Footage, BlueStar never replicated the  
28



1 Celebrity Footage onto Blu-ray Discs and never secured any distribution contracts for  
2 the Celebrity footage at any time through January 1, 2014.

3 16. It was part of the scheme and artifice that on or about November 10,  
4 2010, Defendant HANSEN sent an email to BlueStar Investor M.L. which included a  
5 copy of the Celebrity Footage Contract and that on or about November 12, 2010,  
6 Defendant HANSEN sent a mass e-mail to BlueStar Investors including M.B., K.P.,  
7 R.C., and G.V. which included a copy of the Celebrity Footage Contract. Defendant  
8 HANSEN also made materially false and fraudulent pretenses, representations, and  
9 promises to the BlueStar Investors about the ability of BlueStar to perform under the  
10 Celebrity Footage Contract and generate profit for BlueStar, all to cause the BlueStar  
11 Investors, including M.B., K.P., R.C., G.V., and M.L., to provide money to BlueStar  
12 via bank accounts in Spokane, Washington. At the time Defendant HANSEN made  
13 these materially false and fraudulent pretenses, representations, and promises,  
14 Defendant HANSEN knew that BlueStar was not licensed to use the Blu-ray Disc  
15 format, specifications, and logos in the manufacture, replication, and sale of Blu-ray  
16 Disc, Defendant HANSEN knew that BlueStar did not have the capability to produce  
17 commercial quantities of Blu-ray Discs under the Celebrity Footage Contract,  
18 Defendant HANSEN knew that BlueStar did not have the capability to distribute any  
19 Blu-ray Discs containing the Celebrity Footage, and Defendant HANSEN never took  
20 any meaningful steps to perform under the Celebrity Footage Contract through  
21 January 1, 2014.

22 17. It was part of the scheme and artifice that on or about November 3, 2010,  
23 and continuing to on or about January 31, 2011, Defendant BOYD contacted BlueStar  
24 Investors, including M.B., K.P., R.C., G.V., and M.L., by interstate telephone and  
25 e-mail communications, and made materially false and fraudulent pretenses,  
26 representations, and promises intended to solicit money on behalf of BlueStar and to  
27 cause money from the BlueStar Investors to be provided to BlueStar bank accounts in  
28 Spokane, Washington based on the Celebrity Footage Contract. At the time



1 Defendant BOYD contacted the BlueStar Investors and solicited money from them,  
2 Defendant BOYD knew that Blue Star did not have the capability to produce  
3 commercial quantities of Blu-ray Discs under the Celebrity Footage Contract,  
4 Defendant BOYD knew that BlueStar did not have the capability to distribute any  
5 Blu-ray Discs containing the Celebrity Footage, and Defendant BOYD never took any  
6 meaningful steps to perform under the Celebrity Footage Contract through January 1,  
7 2014.

8 18. It was part of the scheme and artifice that from on or about November 17,  
9 2010, through on or about December 20, 2010, Defendant HANSEN and Defendant  
10 BOYD caused Blue Star Investors M.B., K.P., R.C., G.V., and M.L. to transmit via  
11 interstate wire at least a total of \$90,000 to Blue Star bank accounts in Spokane,  
12 Washington, specifically to a bank account at River Bank with account number  
13 XXXXXX2921, based on the representations in Paragraphs 14 through 17 in this  
14 Indictment.

15 19. It was part of the scheme and artifice that on or about January 5, 2011,  
16 Defendant HANSEN and Defendant BOYD caused Blue Star Investor M.L. to deliver  
17 by mail by the United States Postal Service and private and commercial interstate  
18 carriers, according to the directions thereon, a check for at least \$25,000 for deposit to  
19 Blue Star bank accounts in Spokane, Washington, specifically to a bank account at  
20 River Bank with account number XXXXXX2921, based on the representations in  
21 Paragraphs 14 through 17 in this Indictment.

22 Animated Film Contract

23 20. It was part of the scheme and artifice that on or about July 24, 2012, on  
24 behalf of BlueStar, Defendant HANSEN signed a contract ("Animated Film  
25 Contract") with a film company ("Film Company A") wherein Defendant HANSEN  
26 represented that BlueStar would invest approximately \$250,000 toward a release of an  
27 animated film (the "Animated Film") as well as casting and promotional expenses for  
28 the Animated Film by September 15, 2012 and that in turn BlueStar would retain



1 exclusive distribution rights for the Animated Film, including distribution on Blu-ray  
2 Discs. In truth and fact, BlueStar never invested the \$250,000 and the contract  
3 expired by its own terms on September 15, 2012, leaving BlueStar with no rights to  
4 the Animated Film.

5 21. It was part of the scheme and artifice that on or about July 24, 2012,  
6 Defendant HANSEN forwarded a copy of Animated Film Contract to Defendant  
7 BOYD.

8 22. It was part of the scheme and artifice that on or about August 8, 2012,  
9 Defendant HANSEN and others, both known and unknown, caused a newsletter to be  
10 sent to multiple BlueStar Investors, including E.F., representing that BlueStar had  
11 acquired the distribution rights to the Animated Film, when in truth and fact, BlueStar  
12 had not yet provided \$250,000 required by the Animated Film Contract and therefore  
13 did not actually have the distribution rights to the Animated Film. E.F. then sent  
14 money via interstate wire to BlueStar's bank accounts in Spokane, Washington.

15 23. It was part of the scheme and artifice that on or about September 19,  
16 2012, after the Animated Film Contract expired on by its terms, Defendant HANSEN  
17 sent an e-mail to investor E.F. regarding a purported amendment to the Animated Film  
18 Contract in which Defendant HANSEN represented that a final payment of \$50,000  
19 made by September 24, 2012, from E.F. was necessary, when in truth and fact the  
20 Animated Film Contract had already expired.

21 24. It was part of the scheme and artifice that on or about September 24,  
22 2012, Defendant BOYD sent an e-mail to investor E. F. regarding the Animated Film  
23 Contract and referencing a balance owing of \$30,000 from E.F. when in truth and fact  
24 the Animated Film Contract had already expired.

25 25. It was part of the scheme and artifice that from on or about September  
26 21, 2012, and on or about September 24, 2012, Defendant HANSEN and Defendant  
27 BOYD caused Blue Star Investor E.F. to transmit via interstate wire at least a total of  
28 \$50,000 to Blue Star bank accounts in Spokane, Washington, specifically to a bank

1 account at River Bank with account number XXXX2921, based on the representations  
2 in Paragraphs 20 through 24 in this Indictment.

3 Investment in BlueStar by Film Company B

4 26. It was part of the scheme and artifice that on or about January 24, 2013,  
5 Defendant HANSEN signed a non-binding memorandum of understanding with a film  
6 company ("Film Company B") wherein BlueStar and Film Company B agreed to  
7 explore the possibility of Film Company B investing in BlueStar and possibly  
8 acquiring up to 20% of BlueStar stock. Defendant HANSEN and Defendant BOYD  
9 knew that that the memorandum of understanding with Film Company B was not  
10 binding

11 27. It was part of the scheme and artifice that on or about January 16, 2013,  
12 Defendant BOYD sent an e-mail to BlueStar Investor Y.S. and represented that  
13 BlueStar was now partners with one of the biggest Independent Production  
14 Company's in the world (purported to be Film Company B) while referencing a \$20  
15 million signed deal between BlueStar and Film Company B, when in truth and fact,  
16 Defendant BOYD knew that Film Company B was not partners with BlueStar in  
17 any binding way and there was no deal worth \$20 million between BlueStar and  
18 Film Company B.

19 28. It was part of the scheme and artifice that on or about April 11, 2013,  
20 Defendant HANSEN, on behalf of BlueStar, signed a preliminary agreement with  
21 Film Company B in which Defendant HANSEN falsely misrepresented and  
22 warranted the status of BlueStar's financial position and outstanding legal and  
23 contractual obligations in an attempt to secure investment capital from Film  
24 Company B.

25 29. It was part of the scheme and artifice that on or about May 6, 2013,  
26 Defendant HANSEN sent an e-mail to BlueStar Investor P.D. which contained an  
27 offering to purchase additional stock in BlueStar before the purported closing of a  
28



1 deal with Film Company B, when in truth and fact, Defendant HANSEN and  
2 Defendant BOYD knew that no deal with Film Company B was imminent.

3 30. It was part of the scheme and artifice that on or about May 7, 2013,  
4 Defendant HANSEN sent an e-mail to multiple BlueStar Investors including M.L.,  
5 A.P., A.S. and Y.S. and others which contained an offering to purchase additional  
6 stock in BlueStar before the purported closing date of a deal with Film Company B,  
7 when in truth and fact, Defendant HANSEN and Defendant BOYD knew that no  
8 deal with Film Company B was imminent and there was no scheduled closing date  
9 of any deal with Film Company B.

10 31. It was part of the scheme and artifice that on or about May 16, 2013,  
11 Defendant BOYD sent an e-mail to Blue Star Investor Y.S. with wire transfer  
12 instructions to a BlueStar bank account in Spokane, Washington. On or about May  
13 16, 2013, Defendant BOYD sent an e-mail to Blue Star Investor Y.S. and others  
14 noting that Y.S.'s receipt of an additional 500,000 BlueStar stock shares were  
15 contingent upon receipt of Y.S.'s wire transfer as instructed personally by  
16 Defendant HANSEN. Defendant BOYD's e-mail communications to Y.S. were in  
17 reference to false and misleading representations about Film Company B and  
18 BlueStar.

19 32. It was part of the scheme and artifice that on or about May 21, 2013,  
20 Defendant HANSEN sent an e-mail to a reporter authorizing a press release related  
21 to a purported deal with Film Company B and BlueStar when in truth and fact  
22 Defendant HANSEN knew that no deal with Film Company B was imminent.

23 33. It was part of the scheme and artifice that from on or about April 15,  
24 2013, and through on or about May 17, 2013, Defendant HANSEN and Defendant  
25 BOYD caused Blue Star Investors M.L., A.P., A.S., P.D., and Y.S. to transmit via  
26 interstate wire a total of at least \$220,000 to Blue Star bank accounts in Spokane,  
27 Washington, specifically to a bank account at River Bank with account number  
28

XXXX2921 based on the representations in Paragraphs 26 through 32 in this Indictment.

**COUNT 1**

**Conspiracy to Commit Wire Fraud and Mail Fraud**

(18 U.S.C. § 1349)

34. The Grand Jury repeats and realleges Paragraphs 1 through 29 of this Indictment as if fully set forth herein.

35. Beginning on or about October 1, 2010, and continuing through on or about January 1, 2014, in Spokane, Washington, in the Eastern District of Washington, and elsewhere, Defendant ERICK HALKIER HANSEN and Defendant SEAN MICHAEL BORZAGE BOYD, a/k/a "Sean Michael," a/k/a "Sean Michael Borzage," and a/k/a "Sean Boyd", did knowingly and willfully combine, conspire, confederate, and agree together and with each other, and with other persons both known and unknown to the Grand Jury, to commit offenses against the United States, to wit: 1) wire fraud in violation of 18 U.S.C. § 1343 by, having devised and intended 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 for the purpose of executing such scheme and artifice, to transmit and cause to be transmitted, by wire and radio communications, in interstate and foreign commerce, writings, signs, signals, pictures, and sounds; and, 2) mail fraud in violation of 18 U.S.C. § 1341 by, having devised and intended 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 for the purpose of executing such scheme and artifice, to cause to be delivered by mail by the United States Postal Service and private and commercial interstate carriers, according to the directions thereon, the mail matter.



**Objects of the Conspiracy**

36. The Grand Jury repeats and realleges Paragraph 7 of this Indictment as if fully set forth herein.

**Manner and Means of the Conspiracy**

37. The Grand Jury repeats and realleges Paragraphs 8 through 13 of this Indictment as if fully set forth herein.

**Overt Acts**

38. The Grand Jury repeats and realleges Paragraphs 14 through 33 of this Indictment as if fully set forth herein.

39. All of which is in violation of 18 U.S.C. §§ 1341, 1343, and 1349.

**COUNT 2**

**Mail Fraud**

(18 U.S.C. § 1341)

**Background**

40. The Grand Jury repeats and realleges Paragraphs 1 through 6 of this Indictment as if fully set forth herein.

**Scheme and Artifice**

41. The Grand Jury repeats and realleges Paragraph 7 of this Indictment as if fully set forth herein, as setting forth the scheme and artifice to obtain money from the BlueStar Investors, including M.L., as set forth below corresponding to Count 2 of this Indictment in the chart below.

**The Manner and Means of the Scheme and Artifice**

42. The Grand Jury repeats and realleges Paragraphs 8 through 29 of this Indictment as if fully set forth herein, as setting forth the scheme and artifice to obtain money from BlueStar Investors, including M.L., as set forth below corresponding to Count 2 of this Indictment in the chart below. From on or about or about October 1, 2010, and continuing to on or about January 7, 2011, in the Spokane, Washington, in the Eastern District of Washington, and elsewhere, Defendant ERICK HALKIER

HANSEN and Defendant SEAN MICHAEL BORZAGE BOYD, a/k/a "Sean Michael," a/k/a "Sean Michael Borzage," and a/k/a "Sean Boyd", knowingly and with the intent to defraud, devised and willfully participated in, with knowledge of its fraudulent nature, the scheme and artifice to defraud described in Paragraph 41 of this Indictment to obtain money by materially false and fraudulent pretenses, representations, and promises and knowingly caused to be delivered by mail by the United States Postal Service and private and commercial interstate carriers, according to the directions thereon, the following mail matter, each delivery of which constitutes a separate Count of this Indictment as set forth below corresponding to Count 2 of this Indictment in the chart below:

Count	Date Mailed	Sender	Recipient	Date Received and Deposited
2	Check for \$25,000 from M.L. (#26519) mailed on or about 1/5/2011	M.L. from Glendale, Arizona	BlueStar	Check for \$25,000 from M.L. (#26519) deposited on or about 1/7/2011 into BlueStar Riverbank Account XXXXXX2921 in Spokane, Washington

43. All of which is in violation of 18 U.S.C. § 1341.

### **COUNTS 3-16**

Wire Fraud

(18 U.S.C. § 1343)

### **Background**

44. The Grand Jury repeats and realleges Paragraphs 1 through 6 of this Indictment as if fully set forth herein.

### **Scheme and Artifice**

45. The Grand Jury repeats and realleges Paragraph 7 of this Indictment as if fully set forth herein, as setting forth the scheme and artifice to obtain money from the



BlueStar Investors set forth below corresponding to each Count 3 through 16 of this Indictment in the chart below.

**The Manner and Means of the Scheme and Artifice**

46. The Grand Jury repeats and realleges Paragraphs 8 through 33 of this Indictment as if fully set forth herein, as setting forth the manner and means of the scheme and artifice to obtain money and from the BlueStar Investors set forth below corresponding to each Count 3 through 16 of this Indictment in the chart below. On or about each of the dates set forth below, in Spokane, Washington, in the Eastern District of Washington and elsewhere, Defendant ERICK HALKIER HANSEN and Defendant SEAN MICHAEL BORZAGE BOYD, a/k/a "Sean Michael," a/k/a "Sean Michael Borzage," and a/k/a "Sean Boyd", knowingly and with the intent to defraud, devised and willfully participated in, with knowledge of its fraudulent nature, the scheme and artifice to defraud described in Paragraphs 44 through 46 of this Indictment to obtain money by materially false and fraudulent pretenses, representations, and promises and caused to be transmitted by means of wire communication in interstate commerce the signals and sounds described below for each Count 3 through 16 of this Indictment, each transmission constitution a separate count:

Count	Date of Interstate Wire Transfer	Sender and Sender's Location	Recipient	Amount of Interstate Wire Transfer
3	11/17/2010	M.B. in Decatur, Alabama	BlueStar Riverbank Account XXXXXX2921 in Spokane, Washington	\$15,000
4	11/22/2010	K.P. in Kapolei, Hawaii	BlueStar Riverbank Account XXXXXX2921 in Spokane, Washington	\$25,000

5	12/15/2010	R.C. in Side Lake, Minnesota	BlueStar Riverbank Account XXXXXXX2921 in Spokane, Washington	\$10,000
6	12/16/2010	M.L. in Glendale, Arizona	BlueStar Riverbank Account XXXXXXX2921 in Spokane, Washington	\$25,000
7	12/20/2010	G.V. in Mission Viejo, California	BlueStar Riverbank Account XXXXXXX2921 in Spokane, Washington	\$15,000
8	9/21/2012	E. F. in Golden, Colorado	BlueStar Riverbank Account XXXXXXX2921 in Spokane, Washington	\$20,000 wire transfer
9	9/24/2012	E.F in Golden, Colorado	BlueStar Riverbank Account XXXXXXX2921 in Spokane, Washington	\$30,000 wire transfer
10	4/15/2013	M.L. in Glendale, Arizona	BlueStar Riverbank Account XXXXXXX2921 in Spokane, Washington	\$100,000 wire transfer
11	4/16/2013	P.D. in Arvada, Colorado	BlueStar Riverbank Account XXXXXXX2921 in Spokane, Washington	\$10,000 wire transfer
12	5/3/2013	P.D. in Arvada, Colorado	BlueStar Riverbank Account XXXXXXX2921 in Spokane, Washington	\$20,000 wire transfer
13	5/8/2013	P.D. in Arvada, Colorado	BlueStar Riverbank Account XXXXXXX2921 in Spokane, Washington	\$10,000 wire transfer
14	5/8/2013	A.P. in San Antonio, Texas	BlueStar Riverbank Account XXXXXXX2921 in Spokane, Washington	\$20,000 wire transfer



15	5/9/2013	A.S. in Rochester, NY	BlueStar Riverbank Account XXXXXX2921 in Spokane, Washington	\$10,000 wire transfer
16	5/17/2013	Y.S. in Beverly Hills, California	BlueStar Riverbank Account XXXXXX2921 in Spokane, Washington	\$50,000 wire transfer

47. All of which is in violation of 18 U.S.C. § 1343.

### **NOTICE OF FORFEITURE ALLEGATIONS**

The allegations contained in Counts 1-16 of this Indictment are hereby re-alleged and incorporated herein by this reference for the purpose of alleging forfeitures pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c).

Upon conviction of any of the offenses in Counts 1-16, in violation of 18 U.S.C. §§ 1349, 1341, and/or 1343, Defendants ERICK HALKIER HANSEN, and SEAN MICHAEL BORZAGE BOYD, /k/a “Sean Michael”, a/k/a “Sean Michael Borzage”, a/k/a “Sean Boyd” shall forfeit to the United States any property, real or personal, which constitutes or is derived from proceeds traceable to the offenses, all pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c). The property to be forfeited includes the following:

### **MONEY JUDGMENT**

A sum of money equal to \$395,000 in United States currency, representing the amount of proceeds obtained as a result of the conspiracy to commit wire and mail fraud for which the Defendants, ERICK HALKIER HANSEN, and SEAN MICHAEL BORZAGE BOYD, a/k/a “Sean Michael”, a/k/a “Sean Michael Borzage”, a/k/a “Sean Boyd” are jointly and severally liable.

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

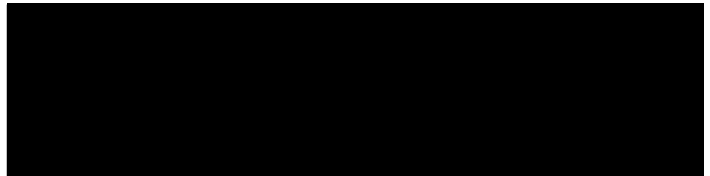
- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;

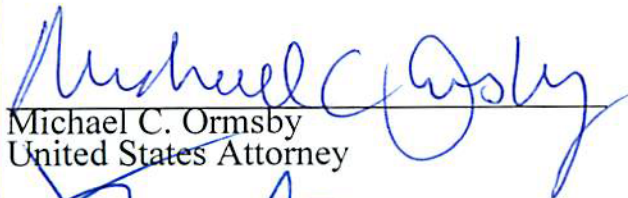
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

the United States shall be entitled to forfeiture of substitute property pursuant to 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c).

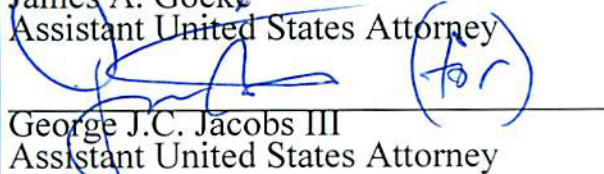
DATED this 17 day of December 2014.

A TRUE BILL



  
Michael C. Ormsby  
United States Attorney

  
James A. Goeke  
Assistant United States Attorney

  
George J.C. Jacobs III  
Assistant United States Attorney