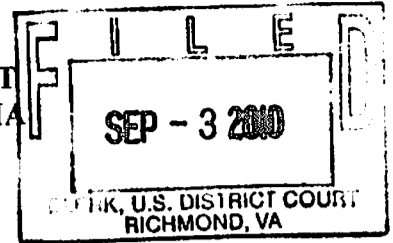


IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division



UNITED STATES OF AMERICA

v.

TOMME BROMSETH,

Defendant.

)
) Criminal No. 3:10cr 24Ce
)
) Count 1 - 18 U.S.C. § 1341
) Mail Fraud
)
) Count 2 - 31 U.S.C. § 5324(a)(3)
) Structuring
)
) Forfeiture Allegation

STATEMENT OF FACTS

The parties stipulate that the allegations in the Criminal Information, and the following facts are true and correct, and had the matters gone to trial, the United States would have proven each of them beyond a reasonable doubt:

1. Defendant TOMME BROMSETH was an individual residing in Chester, Virginia.
2. From in or about July 2006 until in or about November 2007, BROMSETH acted as an independent sales agent to market and sell, *inter alia*, life settlement products to investors from certain companies. These companies included, but were not limited to, A&O Life Funds, LLC; A&O Bonded Life Settlements, LLC; and A&O Bonded Life Settlements Management, LLC (collectively referred herein as "A&O").
3. During the time that BROMSETH sold A&O life settlement products to investors, he made knowing misrepresentations about the risks associated with those investments, as well as his qualifications to sell such investments.

4. For example, sometime during the first half of 2007, BROMSETH solicited F.S. as a potential investor in A&O life settlement products.

5. In addition, BROMSETH told F.S. that he was a Registered Investment Advisor and gave F.S. a business card representing himself as such.

6. In truth and fact, BROMSETH was not a Registered Investment Advisor. At the time BROMSETH gave his business card to F.S., BROMSETH knew that he was not a Registered Investment Advisor.

7. BROMSETH repeatedly told F.S. that an A&O life settlement investment was risk free and a "guaranteed investment." BROMSETH told F.S. that she would receive a minimum compounded annual rate of return of between 10 and 12 percent. In truth and fact, BROMSETH knew that the A&O life settlement investments were neither risk free nor guaranteed.

8. In reliance on these assertions, F.S. invested \$600,000 in A&O through BROMSETH on or about June 19, 2007.

9. BROMSETH's commissions on all A&O sales amounted to approximately \$252,000.

10. On or about June 19, 2007, BROMSETH deposited with Federal Express a package containing a Sun Trust Bank cashier's check in the amount of \$600,000 made out to A&O Life Funds, LLC., that F.S. sought to invest in an A&O Capital Appreciation Bond.

11. From in or about July 2006 until in or about November 2007, BROMSETH sold \$3,074,534.31 of A&O products to 15 investors.

12. On or before April 21, 2009, BROMSETH knew of a domestic financial institution's legal obligation to report transactions in excess of \$10,000.

13. On April 21, 2009, BROMSETH cashed an \$8,656.29 cashier's check at the Bank of Virginia, a domestic financial institution located in the Eastern District of Virginia.

14. On April 23, 2009, BROMSETH deposited \$5,469.53 in cash at the Virginia Commonwealth Bank, a domestic financial institution located in the Eastern District of Virginia, and obtained a cashier's check for the same amount.

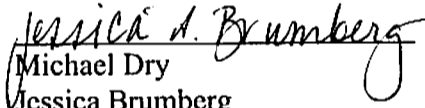
15. BROMSETH knowingly structured, and attempted to structure, these two financial transactions in order to evade the financial institutions' legal reporting obligations.

16. The defendant committed the offenses herein knowingly, voluntarily, without mistake or accident.

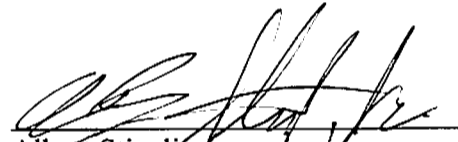
NEIL H. MACBRIDE
UNITED STATES ATTORNEY

DENIS J. MCINERNEY
CHIEF, FRAUD SECTION

By:


Michael Dry
Jessica Brumberg
Assistant United States Attorneys
Eastern District of Virginia

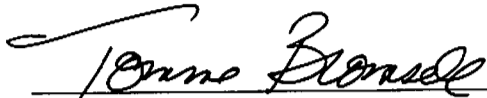
By:


Albert Stieglitz
Trial Attorney, Fraud Section
Department of Justice

DECLARATION

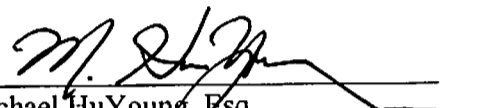
By my signature appearing below, I affirm under penalty of perjury that I have read and agree with the contents of this statement of facts and the same is incorporated by reference into the plea agreement. Moreover, I admit that I participated in the underlying criminal conduct as stated. This is the 30 day of August of 2010.

8/30/10
Date


Tomme Bromseth
Defendant

I am the attorney for the defendant and I have read and agree with the statement of facts.

8/30/10
Date


Michael Hu Young, Esq.
Counsel for Tomme Bromseth