UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

SECURITIES AND EXCHANGE COMMISSION, Plaintiff, vs. **CHRISTOPHER JOSEPH BONGIORNO**, an individual, and **JASON ALLAN ARTHUR**, an individual; Defendants.	Case No.: 1:20-cv-00469 Judge Patricia A. Gaughan

FIRST AMENDED COMPLAINT

Plaintiff, Securities and Exchange Commission (the "Commission"), files this First Amended Complaint against Defendants Christopher Joseph Bongiorno ("Bongiorno") and Jason Allan Arthur ("Arthur") (collectively, "Defendants") and alleges as follows:

SUMMARY OF THE ACTION

1. From at least May 2016 through at least November 2018 (the "Relevant Period"), Bongiorno and Arthur each solicited numerous investors located throughout the United States to purchase the securities of at least two issuers, US Lighting Group, Inc ("USLG") and Petroteq Energy, Inc. ("PQEFF").

2. In connection with their work as securities solicitors, Defendants each engaged in a scheme to defraud by (1) lying to USLG and investors about their identities; (2) recruiting and paying other unregistered individuals to engage in securities solicitations; (3) omitting to fully

and accurately disclose to investors their compensation arrangements; (4) in the case of Arthur, lying to an investor about his compensation; and, (5) in the case of Bongiorno, misappropriating investor funds.

3. While engaged in this conduct, Defendants were neither registered with the Commission as brokers or dealers nor associated with a broker or dealer registered with the Commission.

4. Defendants received transaction-based compensation or commissions for their solicitation activities, which generally amounted to approximately 40% to 50% of investment proceeds from USLG and an average of 39% from PQEFF.

5. In total, Arthur, directly or indirectly through companies he controlled, received transaction-based compensation or gross commissions of at least $1,174,057.10 and Bongiorno, directly or indirectly through companies he controlled, received at least $2,356,358.91 from USLG and PQEFF during the Relevant Period.

6. By using fictitious names, Arthur and Bongiorno knowingly or with severe recklessness made material misrepresentations and omissions to USLG and investors. A reasonable investor would have considered the misstatements and omissions about their true identities important in deciding whether to invest, particularly where, unlike the identities of those they assumed, Arthur and Bongiorno were not licensed to engage in securities solicitations as they were neither registered with the Commission as brokers or dealers nor associated with a broker or dealer registered with the Commission.

7. By engaging in this conduct, as further described herein, Defendants violated and, unless restrained and enjoined by this Court, may continue to violate Section 17(a) of the Securities Act of 1933 (“Securities Act”) [15 U.S.C. § 77q(a)], Sections 15(a)(1) and 10(b) of the

Securities Exchange Act of 1934 ("Exchange Act") [15 U.S.C. §§ 78o(a)(1) and 78j(b)] and Exchange Act Rule 10b–5 [17 C.F.R. § 240.10b–5].

JURISDICTION AND VENUE

8. The Commission brings this action pursuant to Sections 20(b) and 20(d) of the Securities Act [15 U.S.C. § 77t(b) and (g)] and Sections 21(d) and (e) of the Exchange Act [15 U.S.C. § 78u(d) and (e)] to enjoin such acts, practices, and courses of business, and to obtain disgorgement, prejudgment interest, civil money penalties, and such other and further relief as this Court may deem just and appropriate.

9. Defendants were involved in the offer and sale of the common stock and/or warrants of USLG and the common stock of PQEFF, which are each a "security" as that term is defined under Section 2(a)(1) of the Securities Act [15 U.S.C. § 77b(a)(1)] and Section 3(a)(10) of the Exchange Act [15 U.S.C. § 78c(a)(10)].

10. Defendants, directly or indirectly, made use of the mails or the means or instrumentalities of interstate commerce in connection with the conduct alleged in this Complaint.

11. This Court has subject matter jurisdiction over this action pursuant to Section 22 of the Securities Act [15 U.S.C. § 77v], Sections 21(d) and 27 of the Exchange Act [15 U.S.C. §§ 78u(d) and 78aa], and 28 U.S.C. § 1331.

12. Venue in this District is proper because Defendants are found, inhabit, and/or transacted business in the Northern District of Ohio, and because one or more acts or transactions constituting the violations occurred in the Northern District of Ohio.

DEFENDANTS

13. **Christopher Joseph Bongiorno**, born 1978, is last known to reside in Shaker Heights, Ohio. Bongiorno asserted his Fifth Amendment privilege against self-incrimination and refused to testify in connection with the Commission's underlying investigation thereby limiting the Commission's ability to obtain additional particulars and details concerning his conduct.

14. **Jason Allan Arthur**, born in 1977, is last known to reside in Henderson, Nevada. Arthur asserted his Fifth Amendment privilege against self-incrimination and refused to testify in connection with the Commission's underlying investigation thereby limiting the Commission's ability to obtain additional particulars and details concerning his conduct.

FACTS

A. ARTHUR AND BONGIORNO ENGAGED IN UNLICENSED SECURITIES SOLICITATION ACTIVITY

15. During the Relevant Period, Bongiorno and Arthur each solicited numerous investors located throughout the United States to purchase the securities of at least two issuers, US Lighting Group, Inc ("USLG") and Petroteq Energy, Inc. ("PQEFF").

16. USLG is a Florida corporation with its primary place of business in Eastlake, Ohio. At all relevant times, USLG's common stock was traded on an over-the-counter trading system using the ticker "USLG" (and previously traded under the symbol "LXRT").

17. PQEFF is a Canadian corporation headquartered in Sherman Oaks, California. At all relevant times, PQEFF's common stock was traded on an over-the-counter trading system using the ticker "PQEFF."

18. Using prospective investors leads that they generated through a website, among other sources, Defendants would cold-call the prospective investors to pitch them on the value or

merits of USLG or PQEFF as investments and solicit their purchase of one or the other of the securities.

19. When prospective investors expressed an interest in purchasing one or the other of the securities, Arthur or Bongiorno sent the prospective investors subscription agreements and promotional materials, such as recent press releases, and instructed the prospective investors on how to effect their investments in USLG and/or PQEFF.

20. Arthur or Bongiorno would then notify USLG or PQEFF to claim their respective responsibility for soliciting the investments for purposes of receiving transaction-based compensation or commissions.

21. In addition to their own selling efforts, Arthur and Bongiorno also hired or otherwise engaged other individuals to work below them to solicit investors to purchase securities.

22. To find solicitors to hire, Bongiorno, using a credit card in his name, posted various advertisements through Craigslist, including one that was posted on or around October 17, 2017, recruiting "seasoned closers" with "experience in private equity, PPMs."

23. Similarly, Arthur, using a credit card in his name, posted an advertisement through Craigslist on or around January 3, 2017, stating, in part, "looking for OPENERS" and touting that "[w]e provide an Online CRM[1] FULL of leads."

24. When applicable, Arthur and Bongiorno paid a portion of their transaction-based compensation or commissions to the solicitors working below them via checks, wires, and/or interbank transfers.

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[1] The Commission understands CRM to be an acronym for "customer relationship management" and to be a reference to software used to manage leads.

25. While engaged in the business of soliciting investors to purchase USLG securities, Arthur and Bongiorno were neither registered with the Commission as brokers or dealers nor associated with a broker or dealer registered with the Commission, and received commissions thereby, which generally amounted to approximately 40% to 50% of investment proceeds from USLG and an average of 39% from PQEFF.

26. During the Relevant Period, Arthur, directly or indirectly through companies he controlled, received transaction-based compensation or gross commissions from USLG and PQEFF of at least $1,174,057.10, and Bongiorno, directly or indirectly through companies he controlled, received transaction-based compensation or gross commissions from USLG and PQEFF of at least $2,356,358.91.

B. ARTHUR AND BONGIORNO MADE MATERIAL MISREPRESENTATIONS AND OMISSIONS AND ENGAGED IN A SCHEME TO DEFRAUD

i. Arthur Used A Fictitious Name To Entice USLG To Engage Him To Sell Its Securities

27. Beginning in or around May 2016, USLG, through its CEO, Paul Spivak ("Spivak") engaged the Defendants to solicit investors on its behalf.

28. In or around May 2016, Arthur, who first introduced himself by telephone using the fictitious name "Jim Gates," led USLG, through Spivak, to believe that Arthur had the necessary licenses to engage in investor solicitations.

29. For example, in or around May 2016, knowing that the name Jim Gates was associated with a licensed individual, Arthur spoke to Spivak, and encouraged Spivak to research Jim Gates online using the FINRA BrokerCheck application, which maintains a registry of individuals and entities who are licensed to work in the securities industry.

30. Spivak did so and found records for someone named Jim Gates.

31. Believing Arthur was a licensed broker because he held himself out as Jim Gates, USLG, through Spivak, engaged Arthur to solicit investors on its behalf.

ii. Bongiorno Used A Fictitious Name To Entice USLG To Engage Him To Sell Its Securities

32. Shortly after Spivak met Arthur in or around May 2016, Arthur recruited Bongiorno to engage in similar activities on USLG's behalf. Like Arthur, in or around September 2016, via telephone and in-person meetings, Bongiorno introduced himself to USLG, through Spivak, using the fictitious name "John Powers," which Bongiorno knew would lead Spivak and USLG to believe that Bongiorno was currently a licensed broker by directing Spivak to research John Powers online using FINRA BrokerCheck.

33. Spivak did so and found records for someone named John Powers.

34. Believing Bongiorno was a licensed broker because he held himself out as John Powers, USLG, through Spivak, engaged Bongiorno to solicit investors on its behalf.

iii. Arthur Made Misrepresentations and Omissions.

35. Arthur knowingly made multiple misrepresentations and omissions during the Relevant Period in connection with the offer, purchase, and sale of securities.

36. Arthur lied about his true identity when introducing himself to USLG's CEO, Spivak, and falsely led him to believe that Arthur was licensed to sell securities. As Arthur knew, this was false and misleading as Arthur purposefully chose the name of Jim Gates, someone that could be verified online has being a licensed broker.

37. While cold-calling prospective investors, Arthur introduced himself with this fictitious name in connection with the solicitation of prospective investors to purchase securities.

38. For example, during the summer of 2016, Arthur, introducing himself as Jim Gates, cold-called Arthur Rezac ("Rezac"), a resident of Ocean County, New Jersey, and offered Rezac an opportunity to purchase USLG securities.

39. Arthur represented to Rezac, among other things, that Arthur's name was Jim Gates; that Rezac could purchase USLG securities at a price of $0.50 per share; and that in twelve to eighteen months (from the time of the cold call), the value of the investment in USLG would appreciate.

40. As a result of these representations, Rezac decided to invest in USLG and received a certificate for 10,000 USLG shares after mailing a check for $5,000 to USLG on or about September 14, 2016.

41. At no time did Arthur disclose to Rezac Arthur's true identity, that Arthur was not a licensed broker or dealer, that Arthur was not associated with a broker or dealer registered with the Commission, or that Arthur would be paid for soliciting and securing Rezac's investment.

42. As another example, in the fall of 2016, Arthur, identifying himself as Jim Gates, cold-called George Hodges ("Hodges"), a resident of Tarrant County, Texas, and said he was calling on behalf of USLG.

43. After falsely representing that USLG's CEO Spivak was Arthur's uncle, Arthur explained that USLG was a company that manufactured long-lasting lightbulbs and that the company was going to expand. Arthur offered Hodges the opportunity to purchase USLG securities for $0.50 per share and stated that this was a good price.

44. Knowing that he was in fact receiving commission payments, Arthur falsely told Hodges that Arthur was receiving a flat salary and would not receive a commission for any investment in USLG securities made by Hodges.

45. Arthur told Hodges that he could be contacted using the email address Jim.GatesUSLG@gmail.com.

46. Based on these representations, Hodges purchased a total of 25,000 shares of USLG for $12,500 in two separate investments made in or around September 2016 and October 2016.

47. At no time did Arthur disclose to Hodges Arthur's true identity, that Arthur was not a licensed broker or dealer, that Arthur was not associated with a broker or dealer registered with the Commission, or that Arthur would be paid for soliciting Hodge's investment.

48. As another example, during or around August 2016, Arthur, introducing himself as Jim Gates, cold-called Irwin Rosenfeld ("Rosenfeld"), a resident of Orange County, California, and said he was offering an opportunity to invest in USLG which was doing innovative work including, but not limited to, lighting, and that USLG was a startup company that was not yet publicly traded.

49. Based on these representations, Rosenfeld decided to purchase 10,000 shares of USLG at $0.50 per share and mailed a check to USLG on or about August 31, 2016, in payment for the purchased shares.

50. Arthur, using the name Jim Gates, continued to contact Rosenfeld about investing in USLG, and as a result, Rosenfeld purchased an additional 10,000 USLG shares for a total of $5,000 on or about September 30, 2016.

51. At no time did Arthur disclose his true identity, that Arthur was not a licensed broker or dealer, that Arthur was not associated with a broker or dealer registered with the Commission, or that Arthur would be paid for soliciting Rosenfeld's investments.

52. In reality, Arthur was not paid a flat salary as falsely told to investor Hodges, but instead, Arthur actually received transaction-based compensation on the investments he solicited – a fact he omitted to disclose to all investors. Through these means, Arthur obtained money from investors by means of these misrepresentations and omissions, which he made knowingly or with severe recklessness. A reasonable investor would have considered the misstatements and omissions about Arthur's true identity, lack of licensing, actual compensation arrangements, and use of investor funds in deciding whether to invest in securities.

iv. Bongiorno Made Misrepresentations and Omissions.

53. Bongiorno knowingly made multiple misrepresentations and omissions during the Relevant Period in connection with the offer, purchase, and sale of securities.

54. Bongiorno lied about his true identity when introducing himself to USLG's CEO, Spivak, and falsely led Spivak to believe that Bongiorno was licensed to sell securities. As Bongiorno knew, this was false and misleading as Bongiorno purposefully chose the name of John Powers, someone that could be verified online has being a licensed broker.

55. While cold-calling prospective investors, Bongiorno introduced himself with this fictitious name in connection with the solicitation of prospective investors to purchase securities.

56. For example, sometime in late 2016, Bongiorno, introducing himself as John Powers, telephoned Marvin Hughes ("Hughes"), a Marathon County, Wisconsin resident, to offer an opportunity to purchase USLG shares. Bongiorno told Hughes that USLG manufactured specialty lighting and that the value of the company's shares would increase.

57. Based on these representations, between November 14, 2016 and January 29, 2019, Hughes purchased a total of 69,000 USLG shares for a total investment of $23,500.

58. After Hughes made his first investment in USLG in November 2016, Bongiorno continued to call Hughes from late 2016 and into January 2019.

59. Bongiorno, using the name John Powers, told Hughes in either late 2016 or January 2017 about PQEFF and stated that it had developed a cost-efficient process to extract oil from reclaimed oil sands, which would translate into a high rate of return on an investment in PQEFF securities. Based on these representations, Hughes purchased a total of $15,000 of PQEFF stock in two separate purchases made in or around January 2017 and November 2017.

60. At no time did Bongiorno disclose to Hughes Bongiorno's true identity, that Bongiorno was not a licensed broker or dealer, that Bongiorno was not associated with a broker or dealer registered with the Commission, or that Bongiorno would be paid for soliciting Hughes's investments.

61. As another example, in November 2016, Bongiorno, identifying himself as John Powers, telephoned Joseph Duarte ("Duarte") a Contra Costa County, California resident, and solicited Duarte to purchase USLG shares, which Duarte did.

62. After Duarte purchased USLG shares, and at various points between November 2016 and December 2017, Bongiorno and Duarte spoke again via telephone. During these conversations, Bongiorno solicited Duarte to purchase PQEFF shares stating that PQEFF had a machine that could remove sand from oil, that the companies in the oil business would rent or purchase PQEFF's machine, that PQEFF would be successful, and that the stock would increase in value. From these conversations, Duarte came to understand that Bongiorno (John Powers) was acting as a broker on behalf of PQEFF, and that he was purchasing restricted stock directly from PQEFF. Based on these representations, Duarte decided to purchase PQEFF shares in December 2017.

63. At no time did Bongiorno disclose to Duarte Bongiorno's true identity, that Bongiorno was not a licensed broker or dealer, or that Bongiorno was not associated with a broker or dealer registered with the Commission. Nor, at any time, did Bongiorno disclose his true compensation arrangements for Duarte's investments.

64. Through these means, Bongiorno obtained money from investors by means of these misrepresentations and omissions, which he made knowingly or with severe recklessness. A reasonable investor would have considered the misstatements and omissions about Bongiorno's true identity, lack of licensing, and actual compensation arrangements and use of investor funds in deciding whether to invest in securities.

v. Bongiorno Misappropriated Investor Funds.

65. Generally, investors that Bongiorno solicited were instructed to send their funds directly to USLG and PQEFF, as applicable; however, in at least two instances, Bongiorno directed investors to send their investment funds to North Star Assets LLC ("North Star"), an entity Bongiorno controls, after which Bongiorno misappropriated those funds.

66. In the first instance, relating to investor Hughes (discussed in Paragraphs 56-60), sometime after Hughes's January 2017 PQEFF investment and before his November 2017 PQEFF investment, Bongiorno told Hughes in a telephone call that PQEFF was planning to open a new plant that would greatly increase oil production. As a result, Hughes decided to purchase 7,042 shares of PQEFF at $0.71 per share on or about November 28, 2017. In connection with this purchase, on or about November 28, 2017, Bongiorno specifically instructed Hughes to make his check payable to North Star, which Hughes understood to be involved in building a larger plant to allow PQEFF to expand and increase production. Bongiorno did not tell Hughes that Bongiorno controlled North Star.

67. In the second instance, relating to investor Duarte (discussed in Paragraphs 61-63), in or around December 2017, Bongiorno instructed Duarte to make the check purchasing the subject PQEFF shares payable to North Star. Duarte did so and sent a check for $25,000 payable to North Star.

68. Financial records reveal no subsequent transfer of funds from North Star to PQEFF but instead show that the funds received from the two investors were then transferred elsewhere, including to Bongiorno's wife, to other entities Bongiorno controls, and even to Arthur. Further, PQEFF transfer agent records likewise do not reflect any issuance of PQEFF shares to either investor at or around the time that North Star received funds from those investors.

69. By means of these misrepresentations and omissions, Bongiorno obtained money, at least $30,000 from investors. Bongiorno failed to disclose that he intended to and did use investor funds for things other than investments in PQEFF. Bongiorno made these misrepresentations and omissions knowingly or with severe recklessness. A reasonable investor would have considered Bongiorno's misstatements and omissions about the use of investor funds important in deciding whether to invest.

FIRST CLAIM FOR RELIEF

Violations of Section 15(a)(1) of the Exchange Act [15 U.S.C. § 78o(a)(1)]

(*Against each Defendant*)

70. The Commission re-alleges and incorporates by reference each and every allegation in paragraphs 1-12, 14-21, 23-32, 35-52, and 68 as to Arthur and paragraphs 1-13, 15-22, 24-26, 32-34, and 53-69 as to Bongiorno, as if they were fully set forth herein.

71. By engaging in the conduct described above, Defendants:

a. engaged in the business of effecting transactions in securities for the account of others; and

b. directly or indirectly, made use of the mails or the means or instrumentalities of interstate commerce to effect transactions in, or to induce or attempt to induce the purchase or sale of, securities without being registered as a broker or dealer with the Commission or associated with a broker or dealer registered with the Commission.

72. By reason of the foregoing, Defendant violated and, unless enjoined, will continue to violate Sections 15(a)(1) of the Exchange Act [15 U.S.C. § 78o(a)(1)].

SECOND CLAIM FOR RELIEF
Violations of Section 17(a) of the Securities Act [15 U.S.C. § 77q(a)]
(*Against each Defendant*)

73. The Commission re-alleges and incorporates by reference each and every allegation in paragraphs 1-12, 14-21, 23-32, 35-52, and 68 as to Arthur and paragraphs 1-13, 15-22, 24-26, 32-34, and 53-69 as to Bongiorno, as if they were fully set forth herein.

74. By engaging in the conduct described above, Defendants, directly or indirectly, individually or in concert with others, in the offer and sale of securities, by use of the means and instruments of transportation and communication in interstate commerce or by use of the mails has (a) employed devices, schemes, or artifices to defraud; (b) obtained money or property by means of untrue statements of material fact or omissions to state material facts necessary in order to make the statements made, in light of the circumstances under which they were made, not misleading; and (c) engaged in transactions, practices, or courses of business which operated or would operate as a fraud or deceit.

75. With respect to violations of Sections 17(a)(2) and 17(a)(3) of the Securities Act, Defendants were at least negligent in their conduct and in the untrue and misleading statements alleged herein.

76. With respect to violations of Section 17(a)(1) of the Securities Act, Defendants engaged in the above-referenced conduct knowingly or with sever recklessness.

77. By reason of the foregoing, Defendants violated and, unless enjoined, will continue to violate Section 17(a) of the Securities Act [15 U.S.C. § 77q(a)].

THIRD CLAIM FOR RELIEF

Violations of Section 10(b) of the Exchange Act [15 U.S.C. § 78j(b)] and Exchange Act Rule 10b-5 [17 C.F.R. § 240.10b-5]

(*Against each Defendant*)

78. The Commission re-alleges and incorporates by reference each and every allegation in paragraphs 1-12, 14-21, 23-32, 35-52, and 68 as to Arthur and paragraphs 1-13, 15-22, 24-26, 32-34, and 53-69 as to Bongiorno, as if they were fully set forth herein.

79. By engaging in the conduct described above, Defendants, directly or indirectly, individually or in concert with others, in connection with the purchase or sale of securities, by use of the means and instrumentalities of interstate commerce or by use of the mails has (a) employed devices, schemes, and artifices to defraud; (b) made untrue statements of material facts or omitted to state material facts necessary in order to make the statements made, in light of the circumstances under which they were made, not misleading; and (c) engaged in acts, practices, and course of business which operated as a fraud and deceit upon purchasers, prospective purchasers, and other persons.

80. Defendants engaged in the above-referenced conduct and made the above-referenced untrue and misleading statements knowingly or with severe recklessness.

81. By reason of the foregoing, Defendants violated and, unless enjoined, will continue to violate Section 10(b) of the Exchange Act [15 U.S.C. § 78j(b)] and Exchange Act Rule 10b-5 [17 C.F.R. § 240.10b-5].

PRAYER FOR RELIEF

WHEREFORE, the Commission respectfully requests that this Court enter a final judgment:

I.

Permanently restraining and enjoining each Defendant from, directly or indirectly, engaging in conduct in violation of Section 17(a) of the Securities Act [15 U.S.C. § 77q(a)], Sections 10(b) and 15(a)(1) of the Exchange Act [15 U.S.C. §§ 78j(b), 78o(a)(1)], and Exchange Act Rule 10b–5 [17 C.F.R. § 240.10b–5];

II.

Permanently restraining and enjoining each Defendant from directly or indirectly, including, but not limited to, through any entity owned or controlled any of them, soliciting any person or entity to purchase or sell any security;

III.

Ordering each Defendant to disgorge all ill-gotten gains or unjust enrichment derived from the activities set forth in this Complaint, together with prejudgment interest thereon;

IV.

Ordering each Defendant to pay a civil penalty pursuant to Section 21(d)(3) of the Exchange Act [15 U.S.C. § 78u(d)(3)] and Section 20(d) of the Securities Act [15 U.S.C. § 77t(d)];

V.

Retaining jurisdiction of this action in accordance with the principles of equity and the Federal Rules of Civil Procedure in order to implement and carry out the terms of all orders and decrees that may be entered, or to entertain any suitable application or motion for additional relief within the jurisdiction of this Court; and,

VI.

Granting such other and further relief as this Court may deem just, equitable, or necessary in connection with the enforcement of the federal securities laws and for the protection of investors.

Dated: October 28, 2020.

Respectfully submitted,

SECURITIES AND EXCHANGE COMMISSION

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on October 28, 2020, I caused the foregoing First Amended Complaint to be electronically filed with the Clerk of the Court for the Northern District of Ohio, Eastern Division, by using the CM/ECF system which will send a notice of electronic filing to all CM/ECF participants, including all counsel or parties of record on the Service List below.

/s/ David D. Whipple
David D. Whipple

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