Unsealed 10/27/16

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

United States Courts
Southern District of Texas
FILED

October 19, 2016

David J. Bradley, Clerk of Court

UNITED STATES OF AMERICA

v.

[1] HGLOBAL,
[2] CALL MANTRA,
d.b.a. Robust Inc., Raytheon International,
[3] WORLDWIDE SOLUTION,
[4] ZORIION COMMUNICATIONS PVT. LTD.,
[5] SHARMA BPO SERVICES,
[6] HITESH MADHUBHAI PATEL,
a.k.a. Hitesh Hinglaj,
[7] HARDIK ARVINDBHAI PATEL,
[8] JANAK GANGARAM SHARMA,
[9] TILAK SANJAYBHAI JOSHI,
[10] SAURIN JAYESHKUMAR RATHOD,
[11] TARANG RANCHHODBHAI PATEL,
[12] KUSHAL NIKHILBHAI SHAH,
[13] KARAN JANAKBHAI THAKKAR,
[14] MANISH BALKRISHNA BHARAJ,
[15] RAJPAL VASTUPAL SHAH,
[16] SAGAR THAKAR,
a.k.a. Shaggy, Shahagir Thakkar,
[17] CYRIL JHON DANIEL,
[18] JATIN VIJAYBHAI SOLANKI,
[19] JERRY NORRIS,
a.k.a. James Norris, IV,
[20] NISARG PATEL,
[21] MITESHKUMAR PATEL,
a.k.a. Mitesh,
[22] RAJUBHAI BHOLABHAI PATEL,
[23] ASHVINBHAI CHAUDHARI,
[24] FAHAD ALI,
[25] JAGDISHKUMAR CHAUDHARI,
a.k.a. Jagdish,
[26] BHARATKUMAR PATEL,
a.k.a. Bharat,
[27] ASMITABEN PATEL,
[28] VIJAYKUMAR PATEL,
[29] MONTU BAROT,
a.k.a. Monty Barot,
[30] PRAFUL PATEL,
[31] ASHWINBHAI KABARIA,
[32] DILIPKUMAR RAMANLAL PATEL,

SEALED

CRIMINAL NO. 4:16-cr-385-S

18 U.S.C. § 371
Conspiracy
(Count 1)

18 U.S.C. § 1349
Wire Fraud Conspiracy
(Count 2)

18 U.S.C. § 1956(h)
Money Laundering Conspiracy
(Count 3)

18 U.S.C. § 1952
False Statement in Application for Passport
(Counts 4 & 5)

18 U.S.C. § 981
18 U.S.C. § 982
28 U.S.C. § 2461
Forfeiture Allegations

TRUE COPY I CERTIFY
ATTEST:
DAVID J. BRADLEY, Clerk of Court
By Kathleen Murphy
Deputy Clerk

[33] NILAM PARIKH,
[34] DILIPKUMAR AMBAL PATEL,
a.k.a. Don Patel,
[35] VIRAJ PATEL,
[36] ABHISHEK RAJDEV TRIVEDI,
[37] SAMARTH KAMLESHBHAI PATEL,
[38] HARSH PATEL,
[39] AALAMKHAN SIKANDERKHAN PATHAN,
[40] JAYKUMAR RAJANIKANT JOSHI,
[41] ANJANEE PRADEEPKUMAR SHETH,
[42] KUNAL CHATRABHUJ NAGRANI,
[43] SUBISH SURENRAN EZHAVA,
a.k.a. Chris Woods,
[44] SUNNY TARUNKUMAR SUREJA,
a.k.a. Khavya Sureja,
[45] SUNNY JOSHI,
a.k.a. Sharad Ishwarlal Joshi, Sunny Mahashanker Joshi,
[46] RAJESH BHATT,
a.k.a. Manoj Joshi, Mike Joshi,
[47] NILESH PANDYA,
[48] TARUN DEEPAKBHAI SADHU,
[49] VISHALKUMAR RAVI GOUNDER,
a.k.a. Vishal Gounder,
[50] BHAVESH PATEL,
[51] RAMAN PATEL,
[52] RAJESH KUMAR UN,
[53] ANIRUDDH RAJESHKUMAR CHAUHAN,
[54] RAHUL TILAK VIJAY DOGRA,
[55] VICKY RAJKAMAL BHARDWAJ,
[56] CLINTWIN JACOB CHRISSTIAN,
a.k.a. Clintwin Jacob, Clintwin Jacob Christian,
[57] ANEESH ANTONY PADIPURIKAL,
a.k.a. Aneesh Anthony,
[58] JATANKUMAR HARESHKUMAR OZA,
a.k.a. Jatan Oza,
[59] RAJKAMAL OMPRAKASH SHARMA,
[60] VINEET DHARMENDRA VASISHTHA,
a.k.a. Vineet Sharma, Vineet Vashistha, and
[61] GOPAL VENKATESAN PILLAI,

Defendants.

SUPERSEDING INDICTMENT

THE GRAND JURY CHARGES:

General Allegations

"Telefraud"[1] Scam

1. As used in this Indictment, a "call center" was an organization or group of organizations that defendants used in connection with a scheme to defraud U.S. residents by misleading U.S. residents into sending money utilizing a number of different confidence scams, to include:

a. IRS scam: India-based call centers impersonated U.S. Internal Revenue Service (IRS) officers and defrauded U.S. residents by misleading them into believing that they owed money to the IRS and would be arrested and fined if they did not pay their alleged back taxes immediately.

b. USCIS scam: India-based call centers impersonated U.S. Citizen and Immigration Services (USCIS) officers and defrauded U.S. residents by misleading them into believing that they would be deported unless they paid a fine immediately for alleged issues with their USCIS paperwork.

c. Payday loan scam: India-based call centers defrauded U.S. residents by misleading them into believing that the callers were loan officers and that the U.S. residents were eligible for a fictitious "payday loan" (small, short-term, unsecured loan in which repayment is

[1] Telefraud is a term describing fraud activity via telephonic means.

generally linked to a borrower's next paycheck or regular income payment, such as a social security check). The India-based callers directed the U.S. residents to pay an upfront "worthiness fee" to demonstrate an ability to repay the loan. The victims received nothing in return.

d. Government grant scam: India-based call centers defrauded U.S. residents by misleading them into believing that they were eligible for a fictitious government grant. Callers directed the U.S. residents to pay an upfront IRS tax or processing fee. The victims received nothing in return.

Roles in the Operation

2. The defendants held one or more of the following roles in furtherance of the conspiracy:

a. Runner: The defendants referred to below as "Runners" were located in the United States and typically operated regionally. Runners purchased temporary general purpose reloadable ("GPR") cards; forwarded the unique GPR card numbers to the Payment Processors located in India so the cards could be registered; purchased money orders using GPR cards funded with fraud proceeds; retrieved cash payments of scammed funds via money transmitters such as Western Union and MoneyGram using fake identification documents; and deposited scammed funds into bank accounts. Runners were often directed by Domestic Managers.

b. Domestic Manager: The defendants referred to below as "Domestic Managers" were located in the United States and directed runners' activities and at times provided runners with resources and supplies, such as vehicles and credit cards for travel expenses. Domestic

Managers were often the direct points of contact with the Call Center Operators and Payment Processors in India, including to negotiate their crew's payout of scammed funds.

c. Call Center Operator: The defendants referred to below as "Call Center Operators" were located in India and oversaw and managed the day-to-day operations of the call centers, such as keeping time and attendance; maintaining the facilities, to include acquiring telephone numbers from which scam calls would be made; maintaining expense sheets for respective call centers; obtaining and distributing "lead lists";[2] and creating monthly invoices for Payment Processors regarding how much was owed to the call centers based on the amount of scam funds the call centers accrued. In some cases, the Call Center Operators had equity shares in the call centers.

d. Caller: The individuals referred to as "Callers" received lead list information and call scripts. Callers made fraudulent and extortionate calls to victims in the U.S. and elsewhere, purporting to be U.S. government officials or money lenders in order to extract scammed funds from victims.

e. Payment Processor: The defendants referred to below as "Payment Processors" were located in India, were often affiliated with particular call centers, and were the intermediaries between the call centers and the Runners. For example, they facilitated overseas payments for hawaladars, activated (or managed individuals who activated) GPR cards with

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[2] A short-form "lead list" contained personally identifiable information such as name, address, and telephone numbers. A long-form "lead list" contained personally identifiable information such as name, address, telephone numbers, dates of birth, and social security numbers, among other pieces of identifying information.

unwitting U.S. citizens' personally identifiable information ("PII"), communicated with and instructed Runners to liquidate GPR cards, transferred scammed funds from prepaid stored value cards to GPR cards, and liaised with call centers that made the scam calls.

f. Data Broker: The defendants referred to below as "Data Brokers" identified and contacted U.S. and foreign lead generators and marketing companies to purchase names and PII for registering GPR cards and targeting potential victims. Data Brokers also facilitated payment for PII through domestic Runners.

g. Hawaladar: The defendant referred to below as a "Hawaladar" was located in India and liaised between hawaladars in cities outside India and the India-based call centers to obtain requests for funds which would be fulfilled by the call centers. Hawaladar is a person who operates a "hawala". A hawala is an underground banking system based on trust through which money can be made available internationally without actually moving it or leaving a record of the transaction. In a hawala system, a person wanting to send money abroad contacts a broker (the hawaladar), and gives him money, a fee, name, and location of the person to whom he wants the money delivered. The hawaladar contacts another hawaladar in the recipient's country, and the second hawaladar delivers the money to the recipient. The first hawaladar then owes the transferred amount to the second, and the debt is frequently repaid by transactions conducted in the reverse direction.

Call Centers

3. In this Indictment, there are five major conglomerates of call centers, all located in Ahmedabad, Gujarat, India: HGlobal, Call Mantra, Worldwide Solution, Zoriion

Communications, and Sharma BPO (Business Process Outsourcing). During the course of the conspiracy, the call center conglomerates often acted together to effect the scheme, to include: sharing call scripts and lists of potential victims, processing payments for each other, and liquidating victim scammed funds.

HGLOBAL		
DEFENDANTS	**PRIMARY ROLE**	**LOCATION**
HITESH PATEL (a.k.a. HITESH HINGLAJ)	Call Center Operator	India
HARDIK PATEL	Call Center Operator	India
JANAK SHARMA	Payment Processor	India
TILAK JOSHI	Call Center Operator & Payment Processor	India
SAURIN RATHOD	Data Broker	India
TARANG PATEL	Data Broker	India
KUSHAL SHAH	Payment Processor	India
KARAN THAKKAR	Payment Processor	India
MANISH BHARAJ	Call Center Operator	India
RAJPAL SHAH	Call Center Operator & Runner	India
SAGAR THAKAR	Call Center Operator & Payment Processor	India
CYRIL JHON DANIEL	Payment Processor	India
JATIN SOLANKI	Payment Processor	India
JERRY NORRIS	Runner	Oakland, CA
NISARG PATEL	Runner	Warner Robbins, GA

MITESHKUMAR PATEL	Domestic Manager	Willowbrook, IL
RAJUBHAI PATEL	Domestic Manager	Willowbrook, IL
ASHVINBHAI CHAUDHARI	Runner	Louisiana and Texas
FAHAD ALI	Runner	Dyer, IN
JAGDISH CHAUDHARI	Runner	Sarasota, FL
BHARATKUMAR PATEL	Runner	Midlothian, IL
ASMITABEN PATEL	Runner	Willowbrook, IL
VIJAYKUMAR PATEL	Runner	Schiller Park, IL
MONTU BAROT	Runner	Glendale Heights, IL
PRAFUL PATEL	Runner	Fort Meyers, FL
ASHWIN KABARIA	Runner	Bradenton, FL
DILIPKUMAR RAMANLAL PATEL	Runner	Ocala, Florida
NILAM PARIKH	Runner	Pelham, AL
DILIPKUMAR AMBAL PATEL	Runner	Corona, CA
VIRAJ PATEL	Payment Processor	Anaheim, CA
ABHISHEK TRIVEDI	Payment Processor	India
SAMARTH PATEL	Payment Processor	India
HARSH PATEL	Runner	New Jersey
AALAMKHAN SIKANDERKHAN PATHAN	Call Center Operator	India
JAYKUMAR RAJANIKANT JOSHI	Call Center Operator	India
ANJANEE PRADEEPKUMAR SHETH	Call Center Operator	India

CALL MANTRA		
TARGET	**PRIMARY ROLE**	**LOCATION**
KUNAL NAGRANI	Call Center Operator	India
SUBISH EZHAVA	Call Center Operator	India
SUNNY SUREJA	Call Center Operator	India
SUNNY JOSHI	Domestic Manager	Sugar Land, TX
RAJESH BHATT (a.k.a. MANOJ JOSHI)	Domestic Manager	Sugar Land, TX
NILESH PANDYA	Runner	Stafford, TX

WORLDWIDE SOLUTION		
TARGET	**PRIMARY ROLE**	**LOCATION**
TARUN SADHU	Call Center Operator	India
VISHAL GOUNDER	Payment Processor	India
BHAVESH PATEL	Domestic Manager	Phoenix, AZ
RAMAN PATEL	Runner	Phoenix, AZ
RAJESH KUMAR UN	Runner	Phoenix, AZ

ZORIION		
TARGET	**PRIMARY ROLE**	**LOCATION**
ANIRUDDH CHAUHAN	Call Center Operator	India
RAHUL DOGRA	Call Center Operator & Payment Processor	India

VICKY BHARDWAJ (a.k.a. VICKY SHARMA)	Call Center Operator	India
CLINTWIN JACOB	Call Center Operator	India
ANEESH ANTHONY	Call Center Operator	India
JATAN OZA	Payment Processor	India
RAJKAMAL SHARMA	Hawaladar	India

SHARMA BPO SERVICES		
TARGET	**PRIMARY ROLE**	**LOCATION**
VINEET VASISHTHA	Call Center Operator	India
GOPAL PILLAI	Call Center Operator	India

Definitions

4. At all times relevant to this Indictment:

a. "Prepaid stored value cards" were cards that had monetary value placed onto them by purchasers and could be used to fund GPR cards. They were also called "MoneyPaks", "Reloadit", etc., depending on the brand.

b. "GPR cards" or general purpose reloadable cards were cards that had monetary value and could be used like a debit without being associated with a personal bank account. GPR cards were funded and can be reloaded using prepaid stored value cards.

c. Green Dot Corporation ("Green Dot") was an entity that, among other things, sold GPR cards ("Green Dot cards"). Green Dot cards, once funded, could be used to make purchases.

i. In order to fund a Green Dot card, individuals using the cards were first required to register the card telephonically or online by providing, among other things, a name, address, telephone number, date of birth, and social security number.

ii. There were several ways to fund a Green Dot card. One involved the purchase of a MoneyPak card from retail stores such as CVS and Walgreens in amounts from $20 to $500. Once purchased, the customer could, using a code (PIN or personal identification number) on the back of the MoneyPak card, authorize a transfer of funds from the MoneyPak card to a GPR card. For instance, a customer that purchased a $500 MoneyPak could provide the PIN code associated with their MoneyPak to an individual who had a Green Dot card. The Green Dot card holder could then effect the transfer through Green Dot's website or by calling Green Dot's toll free number and providing both the Green Dot card number and the MoneyPak PIN code.

d. Blackhawk Network Holdings ("Blackhawk") was an entity that, among other things, sold "Reloadit" prepaid stored value cards which operated similarly to Green Dot MoneyPaks.

e. Personally identifiable information ("PII") or sensitive personal information is information that can be used on its own or with other information to identify, contact, or locate a person.

f. The terms "accessing" and "accessed" refer to 1) electronically or telephonically registering GPR cards with misappropriated PII; 2) electronically or telephonically transferring victim scammed funds from stored value cards to GPRs; or 3) electronically or telephonically

checking balances of GPR cards.

g. A "money services business" transferred funds on behalf of the public to other locations within the U.S. or to locations abroad by means of wire transfers, such as Western Union or MoneyGram. These businesses also sell money orders.

h. Voice-over Internet Protocol (VoIP) was a telephone connection over the internet; the data was sent digitally using the internet protocol instead of analog telephone lines.

i. "Spoofing" was a mechanism whereby callers could deliberately falsify the information transmitted to a victim's caller ID and thereby disguise their identity or location.

j. YMax Corporation or "Magic Jack" phone numbers utilized physical devices which employed VoIP to allow users to make unlimited local or long distance phone calls to U.S. and Canadian telephone numbers using an existing internet connection; users could make and receive calls using a computer or phone. No additional telephone service was required. A Magic Jack application (or computer program) could substitute as the physical device. Users were permitted to choose the phone number associated with the Magic Jack.

k. A lead generator was an individual or company which used proprietary methods to produce leads usually in mass quantities to sell to other businesses.

Pertinent Phone Numbers

5. During the course of the investigation, the conspirators used approximately 1,500 Magic Jack numbers to defraud victims and to facilitate the transfer of victim funds. The Magic Jack numbers below were some of the most active numbers used to perpetrate the scheme.

6. Targets of the investigation were involved in the bulk purchasing of Magic Jack

devices. On November 18, 2011, ASVHWIN KABARIA using acs.wun@gmail.com emailed HITESH PATEL and JANAK SHARMA at acsglobal3@gmail.com. The email and attached shipping label indicated that ASHWIN KABARIA shipped via UPS 20 Magic Jack devices to an HGLOBAL conspirator in India. On March 7, 2012, ASHWIN KABARIA using acs.wun@gmail.com emailed HITESH PATEL at hitesh.hinglaj@gmail.com indicating that 41 Magic Jack devices had been shipped via UPS to TILAK JOSHI in India. On September 25, 2012, ASHWIN KABARIA using acs.wun@gmail.com emailed HITESH PATEL and JANAK SHARMA who operated email address acsglobal3@gmail.com. The email indicated that ASHWIN shipped 40 Magic Jack devices using UPS to a conspirator in Hoffman Estates, IL.

7. (713) 370-3224 Magic Jack: (713) 370-3224 was a YMax Communications VoIP telephone number ("713 Magic Jack") registered in the name of an individual at an address in Waco, TX, by individuals in Ahmedabad, Gujarat, India. This phone number accessed more than 4,000 Green Dot GPR cards that were registered in more than 1,200 different misappropriated identities in the year 2013. (713) 370-3224 was controlled by HITESH PATEL and other HGLOBAL associates. The subscriber information associated with 713 Magic Jack included the email address JHS.Hinglaj24@yahoo.com. In a Google chat on March 12, 2013 (saved as an email in the acsglobal3@gmail.com account) between HITESH PATEL and ASHWIN KABARIA, HITESH provided the 713 Magic Jack phone number during a conversation about transferring money. The subscriber information for acsglobal3@gmail.com lists the recovery email account as hitesh.hinglaj@gmail.com and HITESH's Indian phone number 9879090909, which HITESH listed on his U.S. visa application.

8. (630) 974-1367 Magic Jack: (630) 974-1367 was a YMax Communications VoIP telephone number ("630 Magic Jack") registered to a person at an address in Aurora, Illinois by individuals in Ahmedabad, Gujarat, India. This phone number accessed more than 990 Green Dot GPR cards that were registered in more than 776 different misappropriated identities from December 28, 2013 through December 23, 2014. The 630 Magic Jack was controlled by HITESH PATEL, JANAK SHARMA, and other HGLOBAL associates. The 630 Magic Jack replaced the 713 Magic Jack and accessed the same IP address. The 630 Magic Jack was registered on January 13, 2014 using IP address 216.169.138.203. On the same day, the 713 Magic Jack placed a phone call to a Green Dot customer service telephone number from IP address 216.169.138.203. The subscriber information associated with 630 Magic Jack listed the password for the Magic Jack account as "DIPESH2008". Between March 18, 2013 and November 7, 2013, email account hglobal01@gmail.com sent at least five (5) emails containing GPR cards that utilized the password "DIPESH2008" or "DIPESH@2008".

9. (785) 340-9064 Magic Jack: (785) 340-9064 was a YMax Communications VoIP telephone number ("785 Magic Jack") registered to a person at an address in Columbus, KS by individuals in Ahmedabad, Gujarat, India. This phone number accessed at least 4,163 Green Dot GPR cards that were registered in at least 1,903 different misappropriated identities from September 23, 2013 through October 18, 2014. The 785 Magic Jack was controlled by JATAN OZA. On or about October 15, 2013, JATAN OZA using jatan_oza@rocketmail.com drafted an email in which the body contained the email address that was used to register the 785 Magic Jack. The 785 Magic Jack subscriber records show that its Magic Jack application was

installed on an iPhone titled "jatan_oza's iphone". On October 31, 2013, email account jatan_oza@rocketmail.com was utilized to send an email originating from IP address 122.179.140.176. This same IP address was the originating IP address for all calls using the 785 Magic Jack on the same day.

Scope of Conspiracy

10. The defendants have perpetrated an enormous and complex fraud scheme that has resulted in hundreds of millions of dollars of victim losses derived from persons located throughout the United States. The design of the scheme and the rapid movement of victim funds often resulted in victims being unable to report the fraud in time for their funds to be recovered. Over 15,000 known victims with losses attributable to scam calls have been identified thus far, and upwards of 50,000 individuals have had their identities misappropriated based on the unauthorized use of their PII to register GPR cards used to move telefraud victim funds.

COUNT ONE
18 U.S.C. § 371
(Conspiracy)

11. Beginning in or about January 2012, the exact date being unknown to the Grand Jury, and continuing through in or about the date of the Indictment, in the Southern District of Texas and elsewhere, the defendants: **[1] HGLOBAL, [2] CALL MANTRA, [3] WORLDWIDE SOLUTION, [4] ZORIION COMMUNICATIONS PVT. LTD., [5] SHARMA BPO SERVICES, [6] HITESH MADHUBHAI PATEL, [7] HARDIK ARVINDBHAI PATEL, [8] JANAK GANGARAM SHARMA, [9] TILAK SANJAYBHAI JOSHI, [10] SAURIN JAYESHKUMAR RATHOD, [11] TARANG RANCHHODBHAI**

PATEL, [12] KUSHAL NIKHILBHAI SHAH, [13] KARAN JANAKBHAI THAKKAR, [14] MANISH BALKRISHNA BHARAJ, [15] RAJPAL VASTUPAL SHAH, [16] SAGAR THAKAR, [17] CYRIL JHON DANIEL, [18] JATIN VIJAYBHAI SOLANKI, [19] JERRY NORRIS, [20] NISARG PATEL, [21] MITESHKUMAR PATEL, [22] RAJUBHAI BHOLABHAI PATEL, [23] ASHVINBHAI CHAUDHARI, [24] FAHAD ALI, [25] JAGDISHKUMAR CHAUDHARI, [26] BHARATKUMAR PATEL, [27] ASMITABEN PATEL, [28] VIJAYKUMAR PATEL, [29] MONTU BAROT, [30] PRAFUL PATEL, [31] ASHWINBHAI KABARIA, [32] DILIPKUMAR RAMANLAL PATEL, [33] NILAM PARIKH, [34] DILIPKUMAR AMBAL PATEL, [35] VIRAJ PATEL, [36] ABHISHEK RAJDEV TRIVEDI, [37] SAMARTH KAMLESHBHAI PATEL, [38] HARSH PATEL, [39] AALAMKHAN SIKANDERKHAN, [40] JAYKUMAR RAJANIKANT JOSHI, [41] ANJANEE PRADEEPKUMAR SHETH, [42] KUNAL CHATRABHUJ NAGRANI, [43] SUBISH SURENRAN EZHAVA, [44] SUNNY TARUNKUMAR SUREJA, [45] SUNNY JOSHI, [46] RAJESH BHATT, [47] NILESH PANDYA, [48] TARUN DEEPAKBHAI SADHU, [49] VISHALKUMAR RAVI GOUNDER, [50] BHAVESH PATEL, [51] RAMAN PATEL, [52] RAJESH KUMAR UN, [53] ANIRUDDH RAJESHKUMAR CHAUHAN, [54] RAHUL TILAK VIJAY DOGRA, [55] VICKY RAJKAMAL BHARDWAJ, [56] CLINTWIN JACOB CHRISSTIAN, [57] ANEESH ANTONY PADIPURIKAL, [58] JATANKUMAR HARESHKUMAR OZA, [59] RAJKAMAL OMPRAKASH SHARMA, [60] VINEET DHARMENDRA VASISHTHA, and [61] GOPAL VENKATESAN PILLAI, did knowingly and intentionally conspire and

agree with each other and others known and unknown, to commit offenses against the United States, namely:

a. to knowingly and with intent to defraud, devise, and intend to devise, a scheme and artifice to defraud, and to obtain money and property by means of false and fraudulent pretenses, representations, and promises, and, for the purpose of executing such scheme and artifice, would and did transmit and cause to be transmitted by means of wire, radio, and television communication in interstate and foreign commerce, any writings, signs, signals, pictures, and sounds for the purpose of executing such scheme or artifice, to wit, defendants and others known and unknown, placed telephone calls from a place outside of the United States to victims in the United States to represent themselves to be officers of a U.S. federal agency and thereby extort the payment of funds through the use of interstate electronic payments, in violation of Title 18, United States Code, Section 1343;

b. to falsely assume and pretend to be an officer and employee acting under the authority of the United States and a department, agency, and officer thereof and would and did act as such, and in such pretended character, demand and obtain money, paper, documents, and things of value, in violation of Title 18, United States Code, Section 912;

c. to knowingly transfer, possess, or use, without lawful authority, a means of identification of another person with the intent to commit, and to aid or abet, and in connection with, any unlawful activity that constitutes a violation of Federal law, and that constitutes a felony under any applicable State and local law, including the wire fraud alleged in subsection (a) and money laundering alleged in subsection (e), in violation of Title 18, United States Code, Section 1028(a)(7);

d. to knowingly, and with intent to defraud, traffic in and use one or more unauthorized access devices, that is, GPR cards, during any one-year period, and by such conduct obtain anything of value aggregating $1,000 or more during that period, said conduct affecting interstate and foreign commerce, in violation of Title 18, United States Code, Section 1029(a)(2); and

e. to knowingly conduct or attempt to conduct financial transactions affecting interstate commerce and foreign commerce, which transactions

involved the proceeds of specified unlawful activity, that is, the wire fraud alleged in subsection (a), knowing that the transactions were designed in whole or in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, and that while conducting and attempting to conduct such financial transactions, knew that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

Purpose of the Conspiracy

12. It was a purpose of the conspiracy that the defendants and their conspirators unjustly enriched themselves and others by fraudulently inducing U.S.-based victims to pay the defendants and their conspirators' alleged fines and fees and by concealing and disguising the proceeds of the conspirators' unlawful activities.

Manner and Means of the Conspiracy

13. It was part of the conspiracy that the defendants and their conspirators engaged in a scheme involving extorting money from U.S.-based victims oftentimes by purporting to be U.S. government officials, rapidly moving victim scammed funds through different monetary devices, and using those proceeds to fund hawala transfers from India and other foreign countries to the U.S.

14. It was further part of the conspiracy that the defendants and their conspirators operated call centers located primarily in and around Ahmedabad, Gujarat, India, obtained and distributed scripts and lead lists from data brokers which contained PII for the purpose of contacting and defrauding potential victims.

15. It was further part of the conspiracy that the defendants and their conspirators, at

times using "spoofed" numbers to make their calls appear to originate from a federal agency, telephoned U.S.-based victims purporting to be U.S. government officials or lenders and threatened victims with prosecution or arrest for purported immigration or tax violations unless the victims paid alleged fines or fees immediately.

16. It was further part of the conspiracy that the defendants and their conspirators instructed victims to go to banks or ATMs to withdraw money, use this money to purchase prepaid stored value cards from retail stores, and then provide the unique serial number of the prepaid stored value cards.

17. It was further part of the conspiracy that U.S.-based defendants and their conspirators obtained GPR cards, each assigned a unique number, and transmitted these numbers to India-based defendants and their conspirators who activated the GPR cards by registering them using misappropriated PII of U.S.-based persons.

18. It was further part of the conspiracy that the defendants and their conspirators transferred victim funds from the stored value cards to the GPR cards in the possession of U.S.-based defendants and their conspirators.

19. It was further part of the conspiracy that the U.S.-based defendants and their conspirators used the GPR cards loaded with victim scammed funds to purchase money orders and then deposited the money orders into U.S. bank accounts of individuals or businesses.

20. It was further part of the conspiracy that India-based defendants and their conspirators accepted payments and orders from foreign-based hawaladars and defrauded victim funds so as to fulfill hawala transfers to U.S.-based recipients.

21. It was further part of the conspiracy that the India-based defendants and their conspirators directed victims to wire scammed funds to money services businesses, such as Western Union, to the attention of fictitious names and U.S.-based defendants and their conspirators retrieved the money using false identification in the fictitious names and subsequently deposited the victim scammed funds into U.S. bank accounts of individuals and businesses

Overt Acts

2012 and 2013

Mamta S.

22. On or about October 29 and 30, 2013, HGLOBAL Callers telephonically extorted victim Mamta S., a resident of San Francisco, CA, of $43,000 by fraudulently purporting to be state and federal agents, demanding payment for alleged immigration and tax violations.

23. On or about October 29 and 30, 2013, HGLOBAL Callers directed victim Mamta S. to purchase 86 prepaid MoneyPak cards with the stored value of $43,000 and transmit the PINs associated with those MoneyPaks to the Callers.

24. Between October 28, 2013 and October 30, 2013, MITESHKUMAR PATEL electronically transmitted 20 of the 27 GPR card numbers to a conspirator to be registered. HGLOBAL conspirators registered all 27 GPR cards with misappropriated PII.

25. On or about October 29 and 30, 2013, HGLOBAL conspirators transferred victim Mamta S.'s extorted $43,000 from 86 MoneyPak cards to 27 GPR cards. The 713 Magic Jack accessed 24 of the 27 GPR cards and transferred the funds from 19 of victim Mamta S.'s

MoneyPaks to 17 of the GPR cards. JANAK SHARMA using his Indian cell phone number transferred the funds from one of victim Mamta S.'s MoneyPaks to one of the GPR cards.

26. On October 29 and 30, 2013, a conspirator sent emails to JANAK SHARMA at hglobal01@gmail.com containing MoneyPak PINs purchased by victim Mamta S., to which JANAK responded "Approved". "Approved" is believed to be an indication that the stored value card funds had been successfully transferred to reloadable GPR cards.

27. An HGLOBAL conspirator registered at least seven (7) of the 27 GPR cards containing Mamta S.'s money using the misappropriated PII of Amanda B. On or about October 29, 2013 and continuing through October 30, 2013, MITESH electronically communicated all seven (7) of those GPR card numbers to conspirators.

28. On or about October 29, 2013, MITESH and ASMITABEN PATEL purchased money orders in a grocery store in Illinois using two (2) of the GPR cards containing victim Mamta S.'s money. Both of these GPR cards were registered with Amanda B.'s misappropriated PII.

29. Between on or about October 29 and 31, 2013, MITESH sent instructions via messaging to ASMITABEN PATEL and RAJUBHAI PATEL to deposit Mamta S.'s money into at least ten (10) separate bank accounts.

30. On or about October 30, 2013, a conspirator electronically messaged MITESH instructing him to make a $5,000 deposit into a specific Bank of America (BOA) account. On that same day, BHARATKUMAR PATEL deposited $5,000, a portion of which was victim Mamta S.'s money, into the BOA account.

31. On or about October 31, 2013, BHARAT received by deposit $5,000 in money orders primarily funded by victim Mamta S.'s scammed funds.

32. On or about October 29 and 30, 2013, DILIPKUMAR RAMANLAL PATEL (FL) sent a series of emails to JANAK SHARMA at hglobal01@gmail.com containing lists of GPR cards to be activated and loaded. Shortly afterward, JANAK emailed DILIPKUMAR (FL) directing him to convert $1,700 on one GPR card into money orders. This GPR card was funded primarily with Mamta S.'s scammed funds. This card was also funded by MoneyPaks purchased by unknown victims in North Carolina and Texas.

33. On or about October 30, 2013, DILIPKUMAR (FL) responded to JANAK, in sum and substance: "Done".

Shashikant P.

34. On or about December 9, 2013, ZORIION COMMUNICATIONS Callers, telephonically extorted victim Shashikant P., residing in Niles, IL, of $3,683 by fraudulently purporting to be IRS employees, demanding payment for alleged fines and fees for alleged tax violations and threatening arrest and deportation.

35. On or about December 5, 2013, prior to Shashikant P.'s fraud call, ANIRUDDH CHAUHAN received an email containing the account number and password for the toll-free telephone number (866) 978-7577 that was used to contact victim Shashikant P.

36. On or about December 9, 2013, a ZORIION conspirator emailed a lead list to ANEESH ANTONY PADIPURIKAL at account peace.kudos@gmail.com titled "Peter_irs_100", indicating that the contacts were intended to be used for the IRS scam. The

lead list contained Shashikant P.'s PII.

37. On or about December 9, 2013, a ZORIION Caller representing himself to be "Peter" used toll-free number (866) 978-7577 to extort Shashikant P. "Peter" is a known alias of ANEESH ANTONY PADIPURIKAL.

38. On or about December 9, 2013, ANEESH directed victim Shashikant P. to purchase eight (8) prepaid MoneyPak cards with the stored value of $3,683 and transmit the PINs associated with those MoneyPaks to the Callers.

39. On or about December 9, 2013, ANEESH sent Google chat messages to RAHUL DOGRA containing at least four (4) of the MoneyPak numbers purchased by Shashikant P. for processing Shashikant P.'s payments, i.e., transferring the MoneyPak funds to GPR cards.

40. On or about December 9, 2013, ZORIION conspirators transferred the MoneyPak victim funds to four (4) GPR cards.

41. On or about December 9, 2013, JATAN OZA, using the 785 Magic Jack number, accessed three (3) of the GPR cards that were funded by victim Shashikant P.'s MoneyPaks; two of those times JATAN OZA was loading MoneyPaks of a different victim onto the same GPR cards.

42. On or about December 9, 2013, MITESHKUMAR PATEL created a draft email containing the last four digits of one (1) of the GPR cards funded by Shashikant P. and the amount on the card ($1,193).

43. On or about December 9, 2013, conspirators liquidated all four (4) GPR cards at retail locations in Las Vegas, NV.

44. On or about December 13, 2013, CYRIL JHON DANIEL sent an email to a conspirator with an attached spreadsheet containing a list of GPR cards and the identities used to activate them including the four (4) GPR cards funded by victim Shashikant P.

Celia V.

45. On or about May 11, 2012, HGLOBAL Callers telephonically defrauded victim Celia V., a resident of Benicia, CA, of $192 by representing that she would receive a loan of an unspecified amount if she made an upfront payment of $192 via Western Union wire transfer.

46. On or about May 11, 2012, HGLOBAL Callers directed victim Celia V. to send $192 via Western Union wire transfer to an individual with the initials A.M.

47. On or about May 11, 2012, HARDIK PATEL using hardik.323@gmail.com emailed acsglobal3@gmail.com operated by JANAK and HITESH. The email message contained victim Celia V.'s name, a Western Union Money Transfer Control Number (MTCN), and the amount of $192.

48. On or about May 11, 2012, an HGLOBAL conspirator using acsglobal3@gmail.com forwarded HARDIK's email to an HGLOBAL conspirator using email address acs.wu.m@gmail.com who operated a Western Union terminal in Pittsburg, PA.

49. On or about May 11, 2012, the HGLOBAL conspirator at acs.wu.m@gmail.com responded, "Approved" to acsglobal3@gmail.com, indicating that the money was received; and acsglobal3@gmail.com subsequently notified HARDIK of the same by emailing, "Approved".

50. Several months later, HGLOBAL Callers contacted victim Celia V. representing that she had defaulted on the loan despite the fact that victim Celia V. had never received any

money. Victim Celia V. did not send additional funds.

Wade C.

51. On or about August 3, 2012, HGLOBAL Callers telephonically defrauded victim Wade C., a resident of Houston, TX, of $195 by representing that he would receive a $1,000 loan if he made an upfront payment of $195 via Western Union wire transfer.

52. On or about August 3, 2012, HGLOBAL Callers directed victim Wade C. to send $195 via Western Union to an individual with the initials D.R. Victim Wade C. reported that the loan was never received and he lost his $195 upfront payment.

53. On or about August 3, 2012, HARDIK PATEL using hardik.323@gmail.com emailed acsglobal3@gmail.com operated by HITESH and JANAK. The email contained victim Wade C.'s name, an MTCN, the amount of $195, the receiver name with the initials D.R., and an attached image of a driver's license in the name of D.R.

54. On or about August 3, 2012, acsglobal3@gmail.com forwarded the email to a conspirator using email address westgram.tradin@gmail.com who is believed to have operated a Western Union terminal in Delaware.

55. On or about August 3, 2012, the conspirator at westgram.tradin@gmail.com responded "Done" to acsglobal3@gmail.com, indicating that the money had been received, and acsglobal3@gmail.com notified HARDIK of the same by emailing, "Approved".

56. On or about November 30, 2012, SAGAR THAKAR sent an email to HARDIK instructing him to "process as max as you can", "IF DC [debt collection], then tell them cops are on way to arrest you...," and "Lets make huge money and huge cash!"

Ruth M.

57. On or about December 11, 2012, SHARMA BPO Callers telephonically defrauded victim Ruth M., a resident of Indianapolis, IN. SHARMA BPO Callers offered victim Ruth M. a fictitious loan and demanded an upfront processing fee.

58. On or about December 11, 2012, SHARMA BPO Callers directed victim Ruth M. to make a payment of $250 via Western Union money transfer. SHARMA BPO Callers contacted victim Ruth M. on several subsequent occasions after the initial call, threatening her with arrest if additional payments were not made. Victim Ruth M. did not receive a loan.

59. On or about December 10, 2012, prior to victim Ruth M.'s scam call, HGLOBAL conspirator TILAK JOSHI using tilak@unldinc.com emailed a lead list to ABHISHEK TRIVEDI at payment.8226@gmail.com containing victim Ruth M.'s PII.

60. On or about December 10, 2012, ABHISHEK TRIVEDI emailed parts of the lead list including Ruth M.'s PII to conspirator GOPAL PILLAI.

61. On or about December 11, 2012, GOPAL PILLAI using money.pak2012@gmail.com sent an email to ABHISHEK TRIVEDI at payment.8226@gmail.com containing victim Ruth M.'s name, the Western Union MTCN, the amount $250, a note indicating the recipient of the transfer was an individual with the initials M.P., and an image of a California Driver's License for M.P.

62. On or about December 11, 2012, ABISHEK TRIVEDI forwarded the email to email address acsglobal3@gmail.com operated by JANAK SHARMA and HITESH PATEL who forwarded the message to ASHWIN KABARIA at acs.wun@gmail.com.

63. On or about December 11, 2012, ASHWIN KABARIA, who operated a Western Union terminal, responded "got it" to the message, indicating that he had obtained the funds.

64. On or about December 11, 2012, JANAK using acsglobal3@gmail.com emailed ABHISHEK TRIVEDI that the payment was approved and subsequently ABHISHEK using payment.8226@gmail.com emailed GOPAL PILLAI at money.pak2012@gmail.com, indicating that the payment had been picked up.

Patricia T.

65. On or about November 19, 2013, ZORIION Callers telephonically extorted victim Patricia T., residing in Houston, TX, of $3,400 by fraudulently purporting to be IRS employees, threatening arrest and demanding payment for alleged tax violations.

66. On or about November 18 and 19, 2013, CYRIL JHON DANIEL at cyrilhm2426@gmail.com received emails from a conspirator requesting that two of the GPR cards funded by Patricia T. be activated and CYRIL responded with the GPR numbers and the PII he used to register the cards.

67. On or about November 19, 2013, RAJKAMAL SHARMA sent an email to a conspirator at dpatel7312@gmail.com requesting that at least one of the GPR cards funded by victim Patricia T. be activated.

68. On or about November 19, 2013, ZORIION Callers directed victim Patricia T. to purchase six (6) prepaid MoneyPak cards with the stored value of $3,400 and transmit the PINs associated with those MoneyPaks to the Caller. On the same day, conspirators transferred the MoneyPak cards funded by victim Patricia T. to three (3) GPR cards.

69. On or about November 19 and 20, 2013, conspirators liquidated the GPR cards containing victim Patricia T.'s scammed funds in Virginia and Maryland.

70. On or about November 25, 2013, a conspirator sent an email from dpatel7312@gmail.com to RAJKAMAL SHARMA with an attached spreadsheet containing 93 activated GPR cards including one funded by Patricia T.

71. From on or about February 2012 through at least October 2014, RAJKAMAL SHARMA sent over 1,000 emails to conspirators directing deposits of funds into various bank accounts.

Raj D.

72. On or about August 9, 2013, HGLOBAL Callers telephonically extorted Raj D., residing in Chicago, Illinois, of $5,070 by fraudulently purporting to be USCIS and Illinois State Police employees, threatening arrest and deportation and demanding payment for alleged immigration violations.

73. On or about August 9, 2013, HGLOBAL Callers directed victim Raj D. to purchase ten (10) MoneyPak cards in the amount of $5,070 and transmit the PINs associated with the MoneyPaks to the Caller.

74. On or about August 9, 2013, HGLOBAL conspirators transferred victim Raj D.'s scammed funds to three (3) GPR cards which were purchased in Norwalk, CA, Perry, GA, and Fort Valley, GA and registered with the misappropriated PII of Timothy G., Christopher T. and Kristie I.

75. On or about August 9, 2013, VIRAJ PATEL sent an email to SAURIN RATHOD

containing "long-form leads" titled "viraj_50_leads" which included detailed PII belonging to potential U.S. citizen victims, including Kristie I., Christopher T. and Timothy G.

76. On or about August 9, 2013, the three (3) GPR cards loaded with victim Raj D.'s scammed funds were all accessed by the 713 Magic Jack controlled by HITESH and JANAK.

77. On or about August 9, 2013, HGLOBAL conspirators vacated the three (3) GPR cards loaded with victim Raj D.'s scammed funds for MoneyGram and Western Union money orders purchased in Warner Robbins, GA and Anaheim, CA.

Druv P. and Komal C.

78. On or about September 11, 2013, HGLOBAL Callers separately telephonically extorted victims Druv P. and Komal C., residing in San Diego, CA, of a total of approximately $30,000 by fraudulently purporting to be USCIS and California State Police employees, threatening arrest and deportation and demanding payments for alleged immigration violations.

79. On or about September 11, 2013, HGLOBAL Callers directed victims Druv P. and Komal C. to purchase 47 Green Dot MoneyPaks and transmit the PINs to the Callers.

80. On or about September 11, 2013 and September 12, 2013, HGLOBAL conspirators transferred victim Komal C. and Druv P.'s Money Packs to 15 different GPR cards registered on the same dates using misappropriated PII of eight (8) individuals.

81. On or about September 11, 2013 and September 12, 2013, JANAK SHARMA using email account hglobal01@gmail.com received ten (10) emails from a conspirator at payment.sk99@gmail.com containing all of the 47 MoneyPak PINs purchased by victims Druv P. and Komal C. JANAK SHARMA responded, "Approved" to each of the ten (10) emails,

indicating that the scammed funds had been transferred to GPR cards.

82. On or about August 19, 2013, SAURIN RATHOD using saurin2407@gmail.com sent an email containing a lead list with the PII of 211 individuals to HARDIK PATEL at hardik.323@gmail.com. On the same date, HARDIK PATEL sent the same lead list to JANAK SHARMA at hglobal01@gmail.com. Eight (8) of the GPR cards that received funds from victims Druv P. and Komal C. were registered using the misappropriated PII of eight (8) of the individuals on the data list.

83. On or about September 11, 2013, HITESH PATEL's India-based cellular phone numbers accessed one of the GPR cards funded by victims Druv P. and Komal C. and loaded funds from an unrelated victim in Twin Falls, ID.

84. On or about September 11, 2013 and September 12, 2013, the 713 Magic Jack accessed 14 of the 15 GPR cards funded by victims Druv P. and Komal C.

85. On or about September 11, 2013, MITESHKUMAR PATEL using email account mitesh37@gmail.com drafted an email which contained a list of 20 GPR cards, expiration dates, and CCV numbers. Six (6) of the GPR cards were loaded with Druv P. and Komal C.'s scammed funds.

86. From on or about September 10, 2013 through September 11, 2013, DILIPKUMAR RAMANLAL PATEL (FL) emailed JANAK SHARMA at hglobal01@gmail.com. The emails contained seven (7) of the GPR card numbers funded by victims Druv P. and Komal C. From on or about September 11, 2013 through September 12, 2013, JANAK emailed DILIPKUMAR (FL) directing him to purchase money orders with the

GPR cards. DILIPKUMAR PATEL (FL) responded "done".

Gary B.

87. On or about October 24, 2013, CALL MANTRA Callers telephonically extorted victim Gary B., residing in Ukiah, CA of $9,930 by fraudulently purporting to be IRS employees, threatening legal action and demanding payment for alleged tax violations.

88. On or about October 24, 2013, CALL MANTRA Callers directed victim Gary B. to purchase 13 Green Dot MoneyPaks and transmit the PINs to the Callers.

89. On or about October 24, 2013, CALL MANTRA conspirators transferred victim Gary B.'s MoneyPaks to five (5) different GPR cards registered using appropriated PII of four (4) individuals.

90. On or about October 24, 2013, the GPR cards loaded with Gary B.'s scammed funds were used to make purchases in Southgate, MI, Houston, TX, and Stafford, TX. CALL MANTRA conspirators used a GPR card to purchase $2,000 in money orders that were subsequently deposited, on October 30, 2013, into a BOA account for HSHM LLC.

91. On or about November 1, 2013, SUBISH EZHAVA using chrislast902@yahoo.com emailed SUNNY JOSHI at sunny143sq@yahoo.com. The email showed $306,363.45 in GPR card purchases by SUNNY JOSHI during the month of October 2013. Included on the list were three (3) GPR cards funded by victim Gary B.

92. On or about November 1, 2013, SUBISH EZHAVA using chrislast902@yahoo.com sent an email to RAJESH BHATT (a.k.a. MANOJ JOSHI) at mikeno101@yahoo.com. The email showed $293,874.90 in GPR card purchases by RAJESH

BHATT during the month of October 2013. Included on the list was a GPR card funded by victim Gary B.

93. On or about November 14, 2013, CALL MANTRA conspirators wire transferred $22,500 from the BOA HSHM LLC account to RAYTHEON INTERNATIONAL located in Ahmedabad, India.

94. On or about January 22, 2014, KUNAL NAGRANI using kunal.nagrani84@gmail.com received an email from an individual at smp_3112@yahoo.com. The email identified KUNAL NAGRANI's telephone number as the contact number for RAYTHEON INTERNATIONAL.

95. On or about May 12, 2014, KUNAL NAGRANI, using kunal.nagrani84@gmail.com, received an email from an individual at smp_3112@yahoo.com containing the wire transfer records of the $22,500 from HSHM LLC to RAYTHEON INTERNATIONAL.

Anup U.

96. On or about July 18, 2013, an HGLOBAL Caller telephonically extorted victim Anup U., a Stafford, TX resident, of $2,785 by fraudulently purporting to be an immigration agent, demanding payment for alleged immigration violations and threatening that Anup U. would be deported within 24 hours. The HGLOBAL Caller appeared to be calling from 1-800-375-5283, the national call center for USCIS.

97. On or about July 18, 2013, the HGLOBAL Caller directed victim Anup U. to purchase six (6) MoneyPaks totaling $2,785 and to transmit the PINs associated with those

MoneyPaks to the Caller.

98. On or about July 18, 2013, JANAK SHARMA using hglobal01@gmail.com received email messages from a conspirator with the MoneyPak PINs purchased by victim Anup U.

99. On or about July 16, 2013, JANAK SHARMA sent an email from hglobal01@gmail.com to his personal email account janak.sharma31@yahoo.com with an attachment depicting an American flag and a graphic superimposed on the flag of a bag of money, a dollar sign, and the text, "KEEP CALM AND SCAM."

100. On or about July 18, 2013, HGLOBAL conspirators transferred the funds from the MoneyPaks to three (3) different GPR cards that were used to purchase money orders in Illinois, Georgia and Florida by HGLOBAL conspirators.

101. Additionally, on July 18, 2013, an HGLOBAL conspirator using the 713 Magic Jack number accessed all three (3) GPR cards receiving Anup U.'s funds. A conspirator using that same Magic Jack number transferred two (2) of victim Anup U.'s MoneyPak scammed funds to two (2) of the GPR cards.

102. On or about July 18, 2013, MONTU BAROT sent JANAK SHARMA an email from payment.solution2013@gmail.com containing fourteen (14) GPR card numbers, two (2) of which were funded by victim Anup U.'s scammed funds.

103. On or about July 18, 2013, JANAK SHARMA using hglobal01@gmail.com sent MONTU BAROT two emails directing MONTU to liquidate two (2) of the GPR cards funded by victim Anup U. and MONTU BAROT responded, "Done" to each of the emails.

104. On or about July 18, 2013, JANAK SHARMA sent RAJPAL SHAH an email to account hglobalpayments@gmail.com directing RAJPAL to liquidate one of the GPR cards funded by victim Anup U. and RAJPAL responded, "Done for 1136," indicating that he purchased $1,136 in money orders.

105. On or about July 25, 2013, MONTU BAROT sent an email to JANAK with a FedEx shipping label addressed to JANAK SHARMA using the Florida residential address of ASHWINBHAI KABARIA. The subject line of the email read, "Parcel sent for $70,000", which is believed to mean the parcel contained $70,000 of money orders. JANAK forwarded the email to ASHWINBHAI.

106. On or about July 29, 2013, ASHWINBHAI or a conspirator deposited two (2) money orders purchased with GPR cards funded by victim Anup U. into a First Bank account belonging to a conspirator. ASHWINBHAI is a signatory on the bank account for the conspirator.

Andrew S.

107. On or about October 30, 2013, ZORIION Callers telephonically extorted victim Andrew S., a resident of Plymouth, PA, of $750 by fraudulently purporting to be IRS employees, demanding payment for alleged tax violations.

108. On or about October 30, 2013, ZORIION Callers directed victim Andrew S. to purchase two (2) MoneyPak cards with the stored value of $750 and to transmit the PINs associated with the MoneyPak cards to the Caller.

109. On or about October 30, 2013, ZORIION conspirators transferred victim Andrew

S.'s scammed funds from the MoneyPaks to a GPR card.

110. On or about October 30, 2013, CLINTWIN JACOB CHRISSTIAN using jumbolalola@gmail.com emailed TARUN SADHU at worldwidesolution2012@gmail.com. The email subject line was "Card Block Details_$821.63" and the email contained an attached spreadsheet with the GPR card number and registered user information for the GPR card funded by victim Andrew S.

111. On or about October 30, 2013, CLINTWIN JACOB's Indian cell phone number 919662144952 accessed the GPR card funded by victim Andrew S. and loaded two (2) MoneyPaks funded by an unrelated victim onto that card.

Niesha J.

112. On or about September 4, 2013, HGLOBAL Callers telephonically extorted victim Niesha J., a resident of Warrenton, NC, of $180 by fraudulently purporting to be employees of the U.S. Treasury, demanding payment for alleged tax violations.

113. On or about September 4, 2013, HGLOBAL Callers directed victim Niesha J. to purchase a MoneyPak card with the stored value of $180 and to transmit the PIN associated with the MoneyPak card to the Caller.

114. On or about September 4, 2013, HGLOBAL conspirators registered a Green Dot GPR card (-5132) using misappropriated PII.

115. On or about September 4, 2013, SAGAR THAKAR using email account chuckbass0100@gmail.com provided the GPR card number ending in 5132 that was later funded by victim Niesha J. to at least two (2) conspirators during a Google chat. On at least one

occasion, SAGAR THAKAR responded to a conspirator at billyball911@gmail.com with the GPR card funded by victim Niesha J. with the message, "Succes 5132 code ii", indicating that THAKAR had successfully moved Niesha J.'s MoneyPak funds to the GPR card.

116. On or about September 4, 2013, an HGLOBAL conspirator used the GPR card funded by victim Niesha J. to purchase a money order in Phillipsburg, NJ.

Anthony W.

117. On or about October 10, 2013, HGLOBAL Callers telephonically defrauded victim Anthony W., residing in Joliet, IL, by representing that he would receive a government grant of $10,000 if he made upfront payments of $550.

118. On or about October 10, 2013, HGLOBAL Callers directed Anthony W. to purchase two (2) MoneyPaks with the combined stored value of $550 and provide the PINs to the Callers.

119. On or about October 10, 2013, HGLOBAL conspirators transferred Anthony W.'s MoneyPaks to two (2) GPR cards and liquidated one of the GPR cards in Ocala, FL.

120. On or about October 10, 2013, the HGLOBAL Callers contacted victim Anthony W. a second time identifying themselves as IRS employees and demanded additional payments, but victim Anthony W. did not make additional payments.

121. On or about October 10, 2013, JANAK SHARMA using hglobal01@aol.com received two (2) emails from a conspirator at software2712@gmail.com. The emails contained both of Anthony W.'s MoneyPak PINs and the amount of the MoneyPaks purchased by victim Anthony W. JANAK subsequently responded, "Approved" to both emails, indicating that the

GPR cards had been loaded with victim funds.

122. On or about October 10, 2013, DILIPKUMAR RAMANLAL PATEL (FL) using humdil06@aol.com sent an email to JANAK SHARMA at hglobal01@aol.com containing ten (10) GPR cards including both of the cards funded by victim Anthony W. On the same date, JANAK sent two emails to DILIPKUMAR (FL) directing DILIPKUMAR (FL) to purchase money orders with victim Anthony W.'s funds. DILIPKUMAR (FL) responded, "Done" to one of the emails.

Sarika C.

123. On or about October 30, 2013, HGLOBAL Callers telephonically extorted victim Sarika C., residing in Santa Clara, CA, of $16,000 by fraudulently purporting to be USCIS employees, threatening arrest and deportation and demanding payments for alleged immigration violations.

124. On or about October 30, 2013, HGLOBAL Callers directed Sarika C. to purchase 21 MoneyPaks with the stored value of $16,000 and transmit the PINs to the Callers.

125. On or about October 30, 2013, HGLOBAL conspirators transferred Sarika C.'s 21 MoneyPaks to 11 GPR cards and used the GPR cards to purchase 24 money orders.

126. On or about November 5, 2013, TARANG PATEL using email address targang_r_patel@yahoo.co.in sent an email to a lead broker. The subject line of the email was "Re 1800 deposit done" and included the message, ". . . I already paid 1800 five days ago and now I am doing it one more 1800..."

127. On or about November 5, 2013, TARANG PATEL using

tarang_r_patel@yahoo.co.in sent an email to JANAK SHARMA at hglobal01@gmail.com. The email contained the subject line, "Fwd: $1800 Deposit – Data very very very urgent" and the message included the name Dart Data Inc. and its associated bank account number.

128. On or about November 6, 2013, HBLOBAL conspirator deposited $1,800 of money orders, partially funded by victim Sarika C.'s scammed funds, into the lead broker's bank account.

Kimsea S.

129. Between on or about August 12, 2013 through August 13, 2013, CALL MANTRA Callers telephonically extorted victim Kimsea S., a resident of San Jose, CA, of $6,500 by purporting to be IRS employees, threatening her and her husband's arrest and demanding payment for alleged tax violations.

130. From on or about August 12, 2013 through August 13, 2013, CALL MANTRA Callers directed victim Kimsea S. to purchase seven (7) MoneyPak cards with the stored value of $6,500 and to provide the MoneyPak PINs to the Callers.

131. From on or about August 12, 2013 through August 13, 2013, CALL MANTRA conspirators transferred victim Kimsea S.'s scammed funds from the MoneyPaks to six (6) GPR cards registered using misappropriated PII of five (5) U.S. citizens.

132. On or about August 14, 2013, SUNNY SUREJA accessed one of the GPR cards containing victim Kimsea S.'s scammed funds using his Magic Jack number to load funds from an unidentified victim from Woodside, NY.

133. On or about September 2, 2013, SUBISH EZHAVA using

chrislast902@yahoo.com emailed SUNNY JOSHI at sunny143sq@yahoo.com. The email contained a spreadsheet detailing $241,479.80 in GPR card transactions processed by SUNNY JOSHI using 118 GPR cards during the month of August 2013. Included on the list was a GPR card funded by victim Kimsea S. ending in number 1773.

134. On or about August 13, 2013, CALL MANTRA conspirators used GPR card ending in 1773 in two (2) transactions in Missouri City, TX.

135. On or about September 2, 2013, SUBISH EZHAVA using chrislast902@yahoo.com emailed RAJESH BHATT (a.k.a. MANOJ JOSHI) at mikeno101@yahoo.com. The email contained a spreadsheet detailing $239,180.79 in GPR card transactions processed by RAJESH BHATT using 116 different GPR cards during the month of August 2013. Included on the list were two (2) of the GPR cards funded by victim Kimsea S., which were used in three (3) transactions in Houston, TX on August 12, 2013.

Humaira L.

136. From on or about January 27, 2012 through March 18, 2013, TILAK JOSHI processed approximately 3,000 fraudulently-obtained MoneyPak and debit cards funded with victim money through various merchant accounts for HGLOBAL India-based conspirators.

137. From on or about February 25, 2013 through March 1, 2013, HGLOBAL Callers telephonically defrauded victim Humaira L., residing in Houston TX. Callers offered Humaira L. an auto loan but she was instructed to make $1,325 in payments in advance of the loan. HGLOBAL Callers directed victim Humaira L. to purchase five (5) GPR cards and provide the card numbers as payment.

138. From on or about February 25, 2013 through March 1, 2013, the operators of acsglobal3@gmail.com, JANAK SHARMA and HITESH PATEL, sent five (5) emails to TILAK JOSHI containing the five (5) GPR card numbers purchased by Humaira L. TILAK JOSHI responded, "Approved", indicating that the GPR cards had been vacated. At least four (4) of the cards were processed by a conspirator operating a merchant terminal in Milpitas, CA from February 26, 2013 through March 4, 2013.

139. On or about April 22, 2013, TILAK JOSHI emailed HITESH PATEL at hitesh.hinglaj@gmail.com a spreadsheet titled "hitesh.bhai.xlsx." The spreadsheet covered December 12, 2012 through April 19, 2013 and detailed 1,199 GPR and MoneyPak cards totaling $314,396.31 in value and purchased by 852 victims. Included on this list were all five (5) GPR cards purchased by victim Humaira L.

2014

Suresh M.

140. From on or about approximately January 9, 2014 through January 29, 2014, WORLDWIDE SOLUTION Callers extorted Suresh M., a resident of Hayward, CA, of approximately $136,000 by fraudulently purporting to be IRS agents demanding payment for alleged tax violations.

141. From on or about between January 9, 2014 through January 29, 2014, WORLDWIDE SOLUTION Callers directed victim Suresh M. to purchase 276 MoneyPaks with the stored value of approximately $136,000 and transmit the PINs associated with those MoneyPaks to the Callers.

142. From on or about approximately January 9, 2014 through January 29, 2014, conspirators transferred victim Suresh M.'s Money Pak scammed funds to at least 93 GPR cards.

143. From on or about January 9, 2014 through January 10, 2014, KUSHAL SHAH sent emails to CYRIL JHON DANIEL containing images of five (5) of the GPR cards that were funded with victim Suresh M.'s MoneyPaks.

144. From on or about January 9, 2014 through January 10, 2014, CYRIL JHON DANIEL sent two (2) emails to KUSHAL SHAH and JATAN OZA with lists detailing GPR cards and the PII used to activate the GPR cards; included on these lists were eight (8) of the GPR cards funded by victim Suresh M.

145. On or about April 14, 2014, JATIN SOLANKI created a file which was subsequently stored on his Google drive cloud storage titled "Card_2014.xlsx". Included on this file were the same eight (8) GPR cards funded by victim Suresh M.

146. On or about January 10, 2014, JATAN OZA, using the 785 Magic Jack telephone number, accessed one of the GPR cards funded by victim Suresh M. OZA, using the same Magic Jack number, transferred an unidentified victim's funds from a MoneyPak to the same GPR card funded by victim Suresh M.

147. From on or about January 12, 2014 through January 27, 2014, VISHAL GOUNDER used PII stolen from a private New York State company's database, for which VISHAL operated as an IT contractor, to activate 29 of the GPR cards loaded with scammed funds from victim Suresh M. VISHAL called into Green Dot using the VoIP telephone number of the private New York State company that employed VISHAL to activate the 29 GPR cards.

148. From on or about January 12, 2014 through January 26, 2014, VISHAL GOUNDER sent nine (9) emails to TARUN SADHU containing 29 of the GPR card numbers funded by victim Suresh M. and the PII used to activate the cards.

149. On or about January 28, 2014, VISHAL GOUNDER sent an email to himself containing five (5) GPR card numbers funded by victim Suresh M.

150. On or about January 13, 2014, at approximately 11:37 a.m., a conspirator used a GPR card funded by victim Suresh M. at a gas station in Racine, WI which was owned by MITESHKUMAR and ASMITABEN PATEL. On the same day at 12:46 p.m., a conspirator used the same GPR card at a grocery store in Las Vegas, NV.

151. On or about January 14, 16, and 17, 2014, TARUN SADHU contacted Green Dot using his Indian cell phone and accessed four (4) of the GPR cards funded by victim Suresh M.

152. On or about October 15, 2014, TARUN SADHU emailed a conspirator a log covering TARUN's card processing activity between December 13, 2013 and October 15, 2014. Entries in the log for January 23, 24, and 27 of 2014 included the last four (4) digits of seven (7) GPR cards that were funded by victim Suresh M. on the same dates.

153. On or about January 23, 24, and 27, 2014, WORLDWIDE SOLUTION conspirators liquidated in Arizona the seven (7) GPR cards from TARUN SADHU's log that were funded by victim Suresh M.

154. On or about January 23 and 24, 2014, TARUN SADHU and BHAVESH PATEL contacted each other by phone on multiple occasions.

Inaben D.

155. On or about November 6, 2014, an HGLOBAL Caller telephonically extorted victim Inaben D. of Sugar Land, TX of $19,172 by fraudulently purporting to be an employee of USCIS, demanding payment for alleged immigration violations. The Caller represented that Inaben D., a U.S. citizen, would be deported if she did not pay.

156. On or about November 5, 2014, JANAK SHARMA using hglobal01@gmail.com sent a lead list containing the PII of 4,463 individuals including victim Inaben D. to a conspirator who was using email account fastforward01@gmail.com.

157. On or about November 6, 2014, an HGLOBAL Caller directed Inaben D. to wire $17,786 to the Chase bank account of an owner of a Sunnyvale, CA check cashing business. On November 6, 2014, JANAK SHARMA received two emails from fastforward01@gmail.com advising that amounts of $8,800 and $8,986 were wired into the Chase Bank account.

158. On or about November 6, 2014, an HGLOBAL Caller directed Inaben D. to purchase two MoneyPaks, totaling $1,386 and to provide the PINs from the cards.

159. On or about November 6, 2014, JANAK SHARMA received an email from fastfoward01@gmail.com containing the two MoneyPak PINs purchased by victim Inaben D. JANAK responded "Approved" to the email on the same date, indicating that the funds had been transferred to GPR cards.

160. On or about November 6, 2014, the GPR card that received the MoneyPak was purchased in Illinois and was registered using the PII of an individual with the initials D.F.

161. On or about November 6, 2014, JAGDISH CHAUDHARI purchased two (2)

MoneyGram money orders in the name of an individual with the initials E.F.G. using the D.F. card funded by victim Inaben D.

162. On or about November 7, 2014, a conspirator deposited the two E.F.G. money orders into a Chase bank account.

Jeffrey G.

163. On or about September 30, 2014, CALL MANTRA Callers telephonically extorted victim Jeffrey G., residing in San Diego, CA, of $4,176 by fraudulently purporting to be IRS employees, threatening his arrest and demanding fines and fees for alleged tax violations.

164. On or about September 30, 2014, CALL MANTRA Callers directed victim Jeffrey G. to purchase five (5) Blackhawk Network Reloadit cards with the stored valued of $4,176 and provide the PINs associated with those Reloadit cards to the Callers.

165. On or about September 30, 2014, CALL MANTRA conspirators transferred victim Jeffrey G.'s extorted $4,176 from the five (5) Reloadit cards to two (2) PayPower GPR cards which had been purchased at a Randall's Store in Sugar Land, TX on September 29, 2014 and registered in the name of an individual with the initials J.H. of Castle Rock, CO.

166. On or about September 30, 2014, NILESH PANDYA liquidated one of the GPR cards (-1817) at a Walmart store in Pearland, TX for three (3) MoneyGram money orders totaling $2,293.04. The second GPR card (-9695) was not vacated.

167. On or about October 3, 2014, SUBISH EZHAVA using chrislast902@yahoo.com sent an email to SUNNY JOSHI at sunny143sq@yahoo.com titled "Report for the Month of September 2014". The email stated, "Hello Sir, Report for the Month of September 2014

attached. Thank you,", and included an Excel spreadsheet attachment titled "Sunny Report for Sep 2014". The Excel spreadsheet contained a list of 90 GPR cards which were vacated between September 1, 2014 and September 30, 2014 for a total of $169,394.30. The spreadsheet also contained both GPR cards which received victim Jeffrey G.'s extorted funds. The spreadsheet indicated that the liquated card (-1817) was "picked" on September 30, 2014 for $2,293.04 while the non-vacated card (-9695) was "blocked" on the same date.

168. On or about October 5, 2014, SUNNY JOSHI, using sunny143sq@yahoo.com, sent SUBISH EZHAVA an email at chrislast902@yahoo.com titled "Final report 09-01-14 to 09-30-13". The text of the email contained an accounting of SUNNY's activities for the month of September 2014 to include totals, balance, deposits made and expenses. SUNNY JOSHI listed "card's,Magicjack 50 pc,mail,money order ,m=ney order fees,gas" (sic) as expenses.

Priyankaben S.

169. On or about August 28, 2014, HGLOBAL Callers telephonically extorted Priyankaben S., a Sunnyvale, CA resident, of $7,600 by fraudulently purporting to be USCIS employees and threatening her with deportation for failure to pay alleged fines.

170. On or about August 28, 2014, HGLOBAL Callers directed victim Priyankaben S. to purchase eight (8) Reloadit cards with the stored value of $7,600 and transmit the PINs associated with those Reloadit cards to the Callers.

171. On or about August 27, 2014, prior to Priyankaben S.'s fraud call, HGLOBAL conspirators purchased four (4) PayPower GPR cards at a Home Depot in Tulsa, OK and registered the cards using the misappropriated PII of B.L., T.R., J.C., and T.J.

172. On or about August 28, 2014, HGLOBAL conspirators transferred Priyankaben S.'s scammed funds from the seven (7) Reloadit cards to four (4) PayPower GPR cards.

173. On or about August 28, 2014, FAHAD ALI and JAGDISH CHAUDHARI purchased money orders using the GPR cards containing Priyankaben S.'s scammed funds at two Walmart stores in Oklahoma.

174. Previously, on or about August 24, 2014, MITESHKUMAR PATEL booked a hotel room for two adults in the name of FAHAD ALI in Oklahoma City, OK for August 24, 2014 through August 27, 2014. RAJUBHAI PATEL's American Express credit card was used to pay for the hotel room.

175. On or about September 11, 2014, HGLOBAL conspirators reloaded the four (4) GPR cards which previously held victim Priyankaben S.'s scammed funds.

176. On or about September 11, 2014, RAJUBHAI PATEL purchased Western Union money orders at an Ultra Supermarket in Joliet, IL using the reloaded GPR card registered to J.C.

177. On or about August 27 and 28, 2014 and September 11, 2014, HGLOBAL conspirators occupying a 2013 Black Honda (IL S321792) registered to ASMITABEN PATEL drove to at least six (6) of the locations in OK and IL where the GPR cards which received Priyankaben S. and another victim's scammed funds were purchased or vacated.

178. On or about August 23, 2014, FAHAD ALI and JAGDISH CHAUDHARI, occupying the 2013 Black Honda, disposed of a plastic bag containing 55 vacated GPR cards in the dumpster of the Extended Stay America – Dallas.

179. Previously, on or about August 10, 2014, MITESHKUMAR PATEL used

RAJUBHAI PATEL's American Express credit card to book and pay for a hotel room at the Extended Stay America – Dallas in Dallas, TX for the period August 10, 2014 through August 23, 2014 in the name of FAHAD ALI.

Rushikesh B.

180. On or about March 24, 2014, HGLOBAL Callers telephonically extorted victim Rushikesh B., a resident of Naperville, IL, of $14,400 by fraudulently purporting to be the Illinois State Police, threatening Rushikesh B. with arrest and demanding payment for alleged immigration violations.

181. On or about March 24, 2014, HGLOBAL Callers directed victim Rushikesh B. to purchase 29 Reloadit cards with the stored value of $500 each, and transmit the PINs associated with those Reloadit cards to the Callers.

182. On or about March 24, 2014, HGLOBAL conspirators transferred victim Rushikesh B.'s scammed funds from the Reloadit cards to several GPR cards.

183. On or about March 24, 2014, HGLOBAL conspirators purchased money orders at Fort-Myers, FL-area Walmart stores using some of the GPR cards loaded with victim Rushikesh B.'s scammed funds.

184. Between on or about March 24, 2014 and April 4, 2014, PRAFUL PATEL deposited the money orders purchased with victim Rushikesh B.'s scammed funds into several different bank accounts.

185. On or about March 24, 2014, the same day victim Rushikesh B. was scammed, an HGLOBAL conspirator using email account software2712@gmail.com sent at least one email to

JANAK SHARMA at hglobal01@gmail.com containing five (5) of the 29 Reloadit card numbers provided by victim Rushikesh B. to the HGLOBAL Caller.

186. On or about March 24, 2014, HGLOBAL conspirators using the 630 Magic Jack number called PRAFUL PATEL approximately ten (10) times and PRAFUL PATEL called the 630 Magic Jack number once.

Diana D.

187. On or about November 24, 2014, WORLDWIDE SOLUTION Callers telephonically extorted victim Diana D., a resident of Hernando, MS, of $19,625 by fraudulently purporting to be IRS employees, threatening arrest and demanding payment for alleged tax violations.

188. On or about November 24, 2014, WORLDWIDE SOLUTION Callers directed victim Diana D. to purchase 21 prepaid MoneyPak cards with the stored value of $19,625 and transmit the PINs associated with those MoneyPaks to the Callers.

189. On or about November 24, 2014, WORLDWIDE SOLUTION conspirators transferred victim Diana D.'s scammed funds from the MoneyPaks to 12 GPR cards. The GPR cards were registered using the misappropriated PII of seven (7) individuals.

190. On or about November 24, 2014, in a Mesa, AZ Walmart store, RAJESH KUMAR UN purchased two (2) money orders using one of the GPR cards loaded with victim Diana D.'s scammed funds.

191. On or about November 24, 2014, WORLDWIDE SOLUTION conspirators vacated the other 11 GPR cards loaded with victim Diana D.'s scammed funds in Arizona and

Maryland.

Ana K.

192. On or about September 11, 2014, WORLDWIDE SOLUTION Callers telephonically extorted victim Ana K., a resident of Centennial, CO, of $7,599 by fraudulently purporting to be IRS employees, threatening arrest and demanding immediate payment for alleged tax violations.

193. On or about September 11, 2014, WORLDWIDE SOLUTION Callers directed victim Ana K. to purchase nine (9) prepaid Reloadit cards with the stored value of $7,599 and transmit the PINs associated with those Reloadit cards to the Callers.

194. On or about September 11, 2014, WORLDWIDE SOLUTION conspirators transferred victim Ana K.'s scammed funds from the Reloadit cards to five (5) PayPower GPR cards.

195. Between on or about September 4, 2014 and September 11, 2014, WORLDWIDE SOLUTION conspirators registered the GPR cards loaded with Ana K.'s scammed funds using the misappropriated PII of five (5) individuals.

196. On or about September 11, 2014, WORLDWIDE SOLUTION conspirators vacated the five (5) GPR cards loaded with victim Ana K.'s scammed funds in Maryland and Arizona.

197. On or about October 15, 2014, TARUN SADHU emailed a WORLDWIDE SOLUTION conspirator a log covering TARUN's card processing activity occurring between December 13, 2013 and October 15, 2014. Entries in the log for September 11, 2014 included

the amount "950" and the last four (4) digits of one of the GPR cards (-6500) that was funded by victim Ana K. on the same date. The card number was under the column heading "Bhavesh VRN". Transaction records for one of the GPR cards funded by victim Ana K. showed that the card was used in a transaction in Mesa, AZ on September 11, 2014 in the amount of $949.70.

198. On or about October 22, 2014, RAMAN PATEL purchased two (2) money orders at a Walmart store in Mesa, AZ using one of the GPR cards (-6500) loaded with victim Ana K. scammed funds.

Fairy H.

199. From on or about August 19, 2014 through on or about August 22, 2014, HGLOBAL Callers telephonically extorted victim Fairy H., an 85-year-old woman residing in San Diego, CA, of $12,300 by fraudulently purporting to be employees of IRS, threatening arrest and demanding payment for alleged tax violations.

200. From on or about August 19, 2014 through on or about August 22, 2014, HGLOBAL Callers directed victim Fairy H. to purchase 18 MoneyPaks and 14 Reloadit cards with the stored value of $12,300 and to transmit the PINs associated with the cards to the Callers.

201. Between on or about August 19, 2014 and on or about August 25, 2014, HGLOBAL conspirators transferred victim Fairy H.'s scammed funds from the stored value cards to at least 16 GPR cards.

202. Previously, on or about August 18, 2014, SAMARTH PATEL using ccnask@gmail.com emailed JATIN SOLANKI at solanki.jatin93@gmail.com a spreadsheet of 46 GPR cards activated using the misappropriated PII of 16 U.S. citizens. Included on the list

was one of the GPR cards funded by victim Fairy H. on August 19, 2014.

203. On or about August 19, 2014, JATIN SOLANKI using solanki.jatin93@gmail.com emailed KUSHAL SHAH at kushalshah3366@gmail.com a spreadsheet of 43 GPR cards activated using the misappropriated PII of 15 U.S. citizens. Included on the list were two (2) of the GPR cards funded by victim Fairy H.

204. On or about August 19, 2014, ASHVINBHAI CHAUDHARI used one of the GPR cards funded with victim Fairy H.'s scammed funds to purchase three (3) money orders at a Walmart store in Frisco, TX. The GPR card used by ASHIVINBHAI CHAUDHARI was included on the spreadsheet sent by JATIN SOLANKI to KUSHAL SHAH on August 19, 2014.

Diana N.

205. On or about February 10, 2014, CALL MANTRA Callers telephonically extorted victim Diana N., a resident of Monroe, NY, of $3,562 by purporting to be Treasury Inspector General for Tax Administration (TIGTA) employees, threatening her and her husband's arrest and demanding payment for alleged tax violations.

206. On or about February 10, 2014, CALL MANTRA Callers directed victim Diana N. to purchase eight (8) MoneyPaks with the stored value of $3,562 and to provide the MoneyPak PINs to the Callers.

207. On or about February 10, 2014, CALL MANTRA conspirators transferred Diana N.'s scammed funds from the MoneyPaks to two (2) GPR cards registered with misappropriated PII of two U.S. citizens.

208. On or about February 10, 2014, conspirators vacated the GPR cards with Diana

N.'s scammed funds in Houston, TX, Nashville, TN, and Racine, WI. The transaction in Racine, WI occurred at MITESHKUMAR and ASMITABEN PATEL's gas station.

209. On or about March 1, 2014, SUBISH EZHAVA using chrislast902@yahoo.com emailed SUNNY JOSHI at sunny143sq@yahoo.com. The email contained a spreadsheet detailing approximately $308,927.53 in GPR card transactions processed by SUNNY using 179 GPR cards in February 2014. Included on the list was one of the GPR cards funded by victim Diana N.

210. On or about March 4, 2014, SUNNY JOSHI using sunny143sq@gmail.com emailed KUNAL NAGRANI at kunal.callmantra@gmail.com. The subject line of the email was "Final Report (02/01/2014 to02/28/14)". SUNNY JOSHI reported $308,920 in GPR card transactions during this period and receiving a commission of $38,616. SUNNY JOSHI also reported making various deposits during the period including a $50,000 payment to "METISH PATEL" (sic).

211. On or about February 10, 2014, SUNNY JOSHI mailed via USPS a package to MITESH PATEL, consistent with SUNNY's report that he paid MITESH a sum of money in February 2014.

212. On or about February 20, 2014, SUNNY JOSHI mailed via USPS a package to MITESH PATEL, consistent with SUNNY's report that he paid MITESH a sum of money in February 2014.

Gokul T.

213. On or about May 1, 2014, HGLOBAL Callers telephonically extorted victim

Gokul T., residing in San Jose, CA, of $10,154, by fraudulently purporting to be IRS employees, demanding payment for alleged tax violations.

214. On or about April 28, 2014, prior to Gokul T.'s scam call, the operators of ganeshinfosolutions111@gmail.com, AALAMKHAN PATHAN, ANJANEE SHETH, and JAYKUMAR JOSHI, emailed a conspirator at merajkhan@sagaciousbposervices@gmail.com. The email contained a lead list titled "meraj_sir_IRS.xlsx", indicating that its contents were intended to be used for the IRS scam. The lead list contained victim Gokul T.'s PII.

215. On or about May 1, 2014, HGLOBAL Callers directed victim Gokul T. to purchase 14 prepaid MoneyPak cards with the stored value of $10,154 and transmit the PINs associated with those MoneyPaks to the Callers.

216. On or about May 1, 2014, HGLOBAL conspirators transferred victim Gokul T.'s extorted $10,154 from 14 MoneyPak cards to four (4) GPR cards which were activated the day prior, April 30, 2014.

217. From on or about March 6, 2014 through May 3, 2014, RAJPAL SHAH, AALAMKHAN PATHAN, JAYKUMAR JOSHI, ANJANEE SHETH, and VIRAJ PATEL participated in a WhatsApp chat discussing the processing of MoneyPak PINs. "AALAM KHAN" provided the 14 MoneyPak PINs purchased by victim Gokul T. in chats dated May 1, 2014.

218. On or about July 30, 2015, DILIPKUMAR AMBAL PATEL (CA) possessed on his cellphone images of 5,162 different GPR cards, including the four (4) GPR card numbers funded by victim Gokul T. The four GPR cards were used in transactions occurring on May 1,

2014 and May 2, 2014 in Corona, CA and Pomona, CA. When interviewed by investigators, DILIPKUMAR PATEL (CA) admitted to liquidating GPR cards for individuals perpetrating the IRS impersonation scheme and admitted that he worked with RAJPAL SHAH and VIRAJ PATEL, among others.

Daxeshkumar P.

219. On or about February 19, 2014, HGLOBAL Callers telephonically extorted Daxeshkumar P., an Illinois resident, of $1,472 by fraudulently purporting to be IRS agents demanding payment for alleged tax violations. HGLOBAL Callers appeared to be using an IRS telephone assistance number, 1-800-829-1040.

220. On or about February 19, 2014, HGLOBAL Callers directed victim Daxeshkumar P. to purchase three (3) MoneyPaks with the stored value of $1,472 and transmit the PINs associated with those MoneyPaks to the Callers.

221. On or about February 19, 2014, HGLOBAL conspirators funded two (2) GPR cards with victim Daxeshkumar P.'s scammed funds; both GPR cards were purchased between February 18 and 19, 2014 in Pelham, AL and Mishawaka, IN and were registered in the names of individuals with the initials R.M. and T.F.

222. On or about February 19, 2014, KUSHAL SHAH using kushalshah3366@gmail.com emailed CYRIL JHON DANIEL at cyrilhm2426@gmail.com requesting CYRIL to activate a GPR card. In his email response to KUSHAL, CYRIL attached a spreadsheet titled "Cards_19th Feb" which listed 38 GPR cards registered with the PII of eight (8) U.S. citizens. Among the cards listed on the spreadsheet were the two (2) GPR cards which

received the funds of victim Daxeshkumar P.

223. On or about February 19, 2014, one of the GPR cards funded by Daxeshkumar P.'s scammed funds was accessed by the 785 MagicJack controlled by JATAN OZA.

224. On or about February 19, 2014, NILAM PARIKH was observed leaving the Walmart in Hoover, AL after using the GPR card registered to a R.M. PARIKH purchased three (3) MoneyGram money orders totaling $2,220 with Daxeshkumar P.'s scammed funds.

225. On or about February 19, 2014, an HGLOBAL conspirator purchased a MoneyGram money order at a Walmart store in Fishers, IN using the T.F. GPR card and deposited the money order into the BOA account of an individual with the initials E.D. The same bank account received additional money orders on February 19, 2014 which were purchased at a Walmart store in Carmel, IN with a card loaded with funds extorted from another call scam victim. The same GPR card was later vacated at the Racine, WI Exxon-Mobil gas station owned by MITESHKUMAR and ASMITABEN PATEL.

Aisha S.

226. On or about July 10, 2014, WORLDWIDE SOLUTION Callers telephonically extorted victim Aisha S., residing in Austin, TX, of $2,372 by fraudulently purporting to be IRS employees, demanding payment for alleged tax violations.

227. On or about July 10, 2014, WORLDWIDE SOLUTION Callers directed victim Aisha S. to purchase five (5) MoneyPak cards with the stored value of $2,372 and provide the PINs associated with those MoneyPaks to the Callers.

228. On or about July 10, 2014, WORLDWIDE SOLUTION conspirators transferred

victim Aisha S.'s extorted funds from five (5) MoneyPaks to two (2) GPR cards which were subsequently vacated in Michigan and Maryland.

229. On or about June 19, 2014, prior to victim Aisha S.'s scam call, GOPAL PILLAI using money.pak2012@gmail.com emailed TARUN SADHU at worldwidesolution2012@gmail.com. The email contained the subject line "Tarun 20000 tax file", indicating that the contents were intended to be used for the IRS scam, and contained the PII and ethnicity of 20,000 individuals. Included on this list was the phone number and address of victim Aisha S.

Narayanlal R.

230. On or about May 9, 2014, HGLOBAL Callers telephonically extorted victim Narayanlal R., residing in Jackson Heights, NY, of $865 by fraudulently purporting to be IRS employees, threatening arrest and demanding payment for alleged tax violations.

231. On or about May 9, 2014, HGLOBAL Callers directed victim Narayanlal R. to purchase two (2) MoneyPaks with the stored value of $865 and to transmit the MoneyPak PINs to the Callers.

232. On or about May 9, 2014, HGLOBAL conspirators transferred victim Narayanlal R.'s MoneyPaks transferred to a GPR card registered on May 9, 2014 using misappropriated PII and vacated the GPR card at a Kroger Store in Arlington, TX.

233. On or about May 9, 2014, ANJANEE SHETH using ganeshinfosolutions111@gmail.com emailed a lead list to a conspirator at pasidurgaprasad786@gmail.com. The lead list contained the PII of victim Narayanlal R.

234. On or about March 4, 2015, the operators of ganeshinfosolutions111@gmail.com, AALAMKHAN PATHAN, ANJANEE SHETH, and JAYKUMAR JOSHI, emailed gp06656@gmail.com. The subject line of the email was "Fwd: IRS Customers payment details with name". The list included the name of victim Narayanlal R. and the MoneyPak PINs purchased by Narayanlal R. with a payment date listed as May 9, 2014.

Constantine F.

235. On or about January 6, 2014, ZORIION Callers, using telephone number (866) 978-8046, extorted victim Constantine F., a resident of San Francisco, CA, of $1,588 by fraudulently purporting to be IRS agents, demanding immediate payment for alleged tax violations and threatening arrest within one hour if she did not make the payments.

236. On or about December 2, 2013, prior to victim Constantine F.'s scammed call, VICKY BHARDWAJ using bharadwaj.vicky@gmail.com received an email containing a lead list from a conspirator using thomasalviro15@gmail.com. The lead list contained victim Constantine F.'s PII with an additional column titled "Total Tax Debt $" with the amount "50000" listed next to victim Constantine F.'s name.

237. On or about January 6, 2014, ANIRUDDH CHAUHAN using aniruddhc84@gmail.com received an email from business.voicemaster@gmail.com with the subject line "new toll free". The email message contained the telephone number (866) 978-8046, the same phone number used to contact victim Constantine F.

238. On or about January 6, 2014, ZORIION Callers directed victim Constantine F. to purchase four (4) MoneyPaks valued at $1,588 and provide the PINs to the Callers.

239. On or about January 6, 2014, ZORIION conspirators transferred victim Constantine F.'s scammed funds to three (3) GPR cards which were used in transactions in Decatur, GA, Bridgeview, IL, and Evergreen Park, IL.

240. On or about February 17, 2014, a conspirator using Zoriion.newway@gmail.com emailed VICKY BHARDWAJ a spreadsheet detailing victims' payments received from November 2013 through February 2014. Included on the Jan 2014 tab was victim Constantine F.'s name, the MoneyPak PINs purchased by victim Constantine F., and the GPR card numbers loaded with victim Constantine F.'s funds.

Hassan K.

241. On or about April 11, 2014, HGLOBAL Callers telephonically extorted victim Hassan K., residing in Houston, TX, of $1,348 by fraudulently purporting to be IRS employees, threatening arrest and demanding immediate payment for alleged tax violations.

242. On or about April 11, 2014, HGLOBAL Callers directed victim Hassan K. to purchase three (3) MoneyPaks totaling $1,348 and provide the PINs to the Callers.

243. On or about April 11, 2014, HGLOBAL conspirators transferred victim Hassan K.'s MoneyPaks to a GPR card and liquidated the funds at a Walmart store in Norwalk, CT.

244. On or about May 15, 2014, the operators of ganeshinfosolutions111@gmail.com, AALAMKHAN PATHAN, ANJANEE SHETH, and JAYKUMAR JOSHI, sent an email to themselves with two attached files. The attached files were a WhatsApp chat and a spreadsheet titled "APRIL SHEET.xlsx". On or about April 11, 2014, RAJPAL SHAH, AALAMKHAN PATHAN, JAYKUMAR JOSHI, ANJANEE SHETH, and VIRAJ PATEL participated in a

WhatsApp chat discussing the three (3) MoneyPak PINs purchased by Hassan K. Hassan K.'s MoneyPak PINs and amounts were included on the spreadsheet. The column directly next to the MoneyPak PINs purchased by victim Hassan K. read, "MP sent by Jay".

Dilip G.

245. On or about February 27, 2014, CALL MANTRA Callers, using phone number (202) 754-8635, telephonically extorted victim Dilip G., residing in Plano, TX, of $3,500 by fraudulently purporting to be IRS employees, threatening immediate police action and demanding immediate payment for alleged tax violations.

246. On or about February 27, 2014, CALL MANTRA Callers directed victim Dilip G. to purchase seven (7) MoneyPak cards with the stored value of $3,500 and provide the PINs to the Callers.

247. On or about February 27, 2014, CALL MANTRA conspirators transferred victim Dilip G.'s MoneyPak cards to two (2) GPR cards and liquidated the funds at retail locations in South Euclid, OH and Crofton, MD.

248. On or about February 20, 2014, prior to the scam call, SUNNY SUREJA using khavya.sureja@gmail.com received an email from a conspirator at Raghu_trivedi1986@yahoo.com. The email contained the telephone number (202) 754-8635, user name, and password to the account.

249. On or about February 28, 2014, SUNNY SUREJA using khavya.sureja@gmail.com received an email from a conspirator at davidcooper23191@gmail.com. The email contained an attached spreadsheet detailing

payments received in the month of February 2014, including victim Dilip G.'s name and the MoneyPak PINs purchased by victim Dilip G.

Troy P.

250. On or about December 8, 2014, HGLOBAL Callers telephonically extorted victim Troy P., residing in Killeen, TX, of $3,675 by fraudulently purporting to be IRS employees, threatening arrest and demanding payment for alleged tax violations.

251. On or about December 8, 2014, HGLOBAL Callers directed victim Troy P. to purchase eight (8) MoneyPaks which were transferred to four (4) GPR cards registered on December 8, 2014 using the misappropriated PII of four (4) individuals.

252. On or about December 3, 2014, prior to the scam call, KARAN THAKKAR using karan_thakkar84@yahoo.com received an email from a conspirator using email address johnbrooko0911@gmail.com. The email contained a lead list with the PII of 550 individuals, including the PII of the four (4) U.S. citizens used to register the GPR cards funded with Troy P.'s scammed funds.

253. On or about December 7, 2014, JERRY NORRIS messaged KARAN THAKKAR on WhatsApp with the four (4) GPR cards funded by victim Troy P.

254. On or about December 8, 2014, KARAN THAKKER sent to JERRY NORRIS the last four digits of the cards funded by victim Troy P., a PIN for each, the date of birth of the registered card holder, the zip code of the registered cardholder, and the last four digits of the registered cardholders' Social Security number. KARAN THAKKAR immediately followed with, "James send me new gdots.. ..."

255. On or about December 8, 2014, JERRY NORRIS accessed all of the GPR cards funded by victim Troy P. via telephone number (510) 776-8220.

256. On or about December 22, 2014, KARAN THAKKAR using karan_thakkar84@yahoo.in emailed karan_thakkar84@hotmail.com WhatsApp chats between KARAN THAKKAR and JERRY NORRIS from November 14 through December 17, 2014.

Israfil M.

257. On or about July 3, 2014, ZORIION Callers, using telephone number (888) 373-0592, extorted victim Israfil M., residing in Tukwila, WA, of $1,290 by fraudulently purporting to be IRS employees, threatening arrest and demanding immediate payment for alleged tax violations.

258. On or about July 3, 2014, ZORIION Callers directed victim Israfil M. to purchase three (3) MoneyPak cards with the stored valued of $1,290 and provide the PINs to the Callers.

259. On or about July 3, 2014, ZORIION conspirators transferred the three (3) MoneyPaks to two (2) GPR cards which were registered with misappropriated PII and vacated those GPR cards on July 3, 2014 and July 4, 2014 in Thornton, CO, Arlington, TX, and Pantego, TX.

260. On or about July 3, 2014, JATIN SOLANKI using solanki.jatin93@gmail.com created a file in his Google drive titled "Cards 3rd July.xlsx". A GPR card funded by victim Israfil M. was listed on the spreadsheet.

261. On or about June 16, 2014, prior to Israfil M.'s scam call, RAHUL DOGRA using rahultdogra@gmail.com received an email from a conspirator cosmos.it@gmail.com containing

five (5) toll-free telephone numbers and associated passwords. Telephone number (888) 373-0592 was listed in this email.

262. On or about November 3, 2014, RAHUL DOGRA using rahultdogra@gmail.com received an email from a conspirator at manoj2884@gmail.com with the message, "Due to some illegal Activites the (sic) are some issue to allot new DID numbers and active old DID for 2 days so I request you all too kindly support and manage it for 2 days...The complaint states that this number is being used as part of an IRS scam."

Khemwattie G.

263. On or about July 28, 2014, HGLOBAL Callers telephonically extorted victim Khemwattie G., residing in Ozone Park, NY, of $786 by fraudulently purporting to be IRS employees, threatening arrest and deportation and demanding payments for alleged taxes.

264. On or about July 28, 2014, HGLOBAL Callers directed victim Khemwattie G. to purchase two (2) MoneyPaks with the stored value of $786 and transmit the PINs to the Callers.

265. On or about July 28, 2014, HGLOBAL conspirators transferred victim Khemwattie G.'s MoneyPaks to a GPR card registered on July 28, 2014 using misappropriated PII. At least one of the MoneyPaks was transferred to the GPR card by the 630 Magic Jack number operated by JANAK SHARMA.

266. On or about July 28, 2014, MANISH BHARAJ using manish.bharaj@gmail.com emailed JANAK SHARMA at hglobal01@gmail.com. The subject line of the email was

"Payment of [Khemwattie G.]_N_$786.00_28_Jul"[3] and the email message contained Khemwattie G.'s two (2) MoneyPak PINs. JANAK SHARMA responded, "Approved" on the same date, indicating that the MoneyPak PINs were transferred to a GPR card.

267. On or about June 28, 2014 and June 29, 2014, DILIPKUMAR PATEL (CA) processed the GPR card funded by victim Khemwattie G.'s at his business located in Corona, CA.

2015

Halina S. & Maria A.

268. On or about April 2, 2015, HGLOBAL Callers telephonically extorted Halina S., a Hartford, CT resident, of $4,176 by fraudulently purporting to be IRS employees, threatening arrest and a jail sentence if victim Halina S. did not deposit money into NISARG PATEL's Wells Fargo Bank account ending in 9649 for alleged tax violations.

269. On or about April 9 and 10, 2015, HGLOBAL Callers telephonically extorted Maria A., a Chino Hills, CA resident, of $41,000 by fraudulently purporting to be IRS employees, threatening arrest if she did not deposit money for alleged unpaid taxes directly into bank accounts including a CITIBANK account number ending in 8148 registered in the name of NISARG PATEL.

270. Between on or about April 7, 2015 and April 10, 2015, RAJPAL SHAH received five (5) wire transfers in the name of an individual with the initials L.D. and eight (8) wire

[3] The full name of the victim listed in the subject line of the email has been redacted.

transfers in the name of an individual with the initials P.L. using Western Union.

271. On or about April 13, 2015, RAJPAL SHAH and NISARG PATEL possessed the following items: two fraudulent Lawful Permanent Resident cards both with RAJPAL SHAH's image and in the names of L.D. and P.L. and two fraudulent Social Security cards in the names of L.D. and P.L., GPR cards, wire receipts from ACE Cash Services, bank receipts, Western Union transaction forms in the names of L.D. and NISARG PATEL, BOA and Wells Fargo debit cards, and MoneyGram money order receipts.

272. From at least February 24, 2015 through March 31, 2015, RAJPAL communicated about card and money order purchases via text message with MITESHKUMAR PATEL and exchanged GPR card numbers via WhatsApp with JAGDISHKUMAR CHAUDHARI.

273. From at least March 17, 2015 through March 31, 2015, NISARG PATEL texted conspirators with details of purchasing GPR cards and money orders, bank deposit instructions, images of bank deposit slips, and images of GPR cards.

274. On or about May 4, 2015, in a text message, RAJPAL SHAH referenced his familiarity with the pre-payment for services or products scams, "You know what i am into this types of scam since last 5 years if u need to learn more come up i will teach you up".

Juliette B.

275. On or about April 8, 2015, HGLOBAL Callers telephonically extorted Juliette B., a resident of Rochester, NH, of approximately $3,980 by fraudulently purporting to be IRS employees, threatening arrest if she did not pay fines and fees for alleged tax violations. A 202

area code phone number and the words "U.S. Government" appeared on Juliette B.'s caller ID.

276. On or about April 8, 2015, HGLOBAL Callers directed victim Juliette B. to purchase five (5) Reloadit cards in the amount of $2,446.26 and three (3) Green Dot GPR cards in the amount of $1,500 and transmit the PINs associated with those cards.

277. On or about April 8, 2015, HGLOBAL conspirators transferred the scammed funds from the Reloadit cards to three (3) GPR cards serviced by American Express.

278. On or about April 8, 2014, HGLOBAL Callers also directed Juliette B. to pay a "warrant cancellation" fee of $8,500 by depositing money into VIRAJ J. PATEL's BOA account number ending in 3437. Victim Juliette B. did not wire the money to VIRAJ after the bank teller informed her that she was likely the victim of a scam.

William G.

279. Between on or about April 2, 2015 and April 6, 2015, HGLOBAL Callers telephonically extorted victim William G., a resident of Naperville, IL, of more than $37,000 by fraudulently purporting to be employees of the U.S. Treasury and the IRS and demanding payment for alleged tax violations.

280. Between on or about April 2, 2015 and April 6, 2015, HGLOBAL Callers directed victim William G. to purchase approximately 72 prepaid Reloadit cards with the stored value of more than $37,000 and transmit the PINs associated with those Reloadit cards to the Callers.

281. Between on or about April 3, 2015 and April 9, 2015, HGLOBAL conspirators transferred victim William G.'s scammed funds to approximately 38 GPR cards.

282. Between on or about April 3, 2015 and April 9, 2015, HGLOBAL conspirators vacated the GPR cards in California, Colorado, Illinois, and Texas.

283. On or about April 3, 2015, at approximately 1:53 p.m., ASHVINBHAI CHAUDHARI purchased MoneyGram money orders at a Walmart Store in Katy, TX using one of the GPR cards loaded with victim William G.'s scammed funds.

284. On or about April 3, 2015, at approximately 4:23 p.m., ASHVINBHAI CHAUDHARI purchased a MoneyGram money order at a Walmart Store in Houston, TX using one of the GPR cards loaded with victim William G.'s scammed funds.

285. On or about April 3, 2015, at approximately 1:38 p.m., HARSH PATEL deposited some of victim William G.'s scammed funds into a BOA account.

286. On or about April 6, 2015, at approximately 1:44 p.m., RAJUBHAI PATEL used one of the GPR cards loaded with victim William G.'s scammed funds to withdraw cash at an ATM in Littleton, CO. RAJUBHAI PATEL drove up to the ATM in a 2013 white Honda (IL S321775), registered to MITESHKUMAR PATEL and another person. VIJAY PATEL was in the passenger seat of the white Honda.

287. On or about April 6, 2015, at approximately 8:01 p.m., VIJAY PATEL purchased a MoneyGram money order at a Walmart Store in Littleton, CO using a GPR card loaded with victim William G.'s scammed funds.

288. On or about April 7, 2015, at approximately 1:17 p.m., RAJUBHAI PATEL purchased a MoneyGram money order in the amount of $500 in Denver, CO using a GPR card loaded with victim William G.'s scammed funds.

289. On or about April 8, 2015, at a BOA branch in Hinsdale, IL, ASMITABEN PATEL deposited the $500 money order purchased by RAJUBHAI PATEL into a BOA account.

290. On or about April 8, 2015, at approximately 6:59 p.m., RAJUBHAI PATEL purchased a MoneyGram money order at a Walmart Store in Lakewood, CO using a GPR card loaded with victim William G.'s scammed funds.

291. On or about April 9, 2015, VIJAY PATEL deposited a portion of victim William G.'s scammed funds into a Chase bank account at a branch in Firestone, CO.

292. Previously, on or about March 26, 2015, MITESHKUMAR PATEL used RAJUBHAI PATEL's American Express credit card to book and pay for a hotel room in Greenwood Village, CO for the period April 2, 2015 through April 7, 2015.

Luis D.

293. On or about August 27, 2015, HGLOBAL Callers telephonically extorted victim Luis D., a resident of Williamstown, NJ, of $6,500 by fraudulently purporting to be employees of the IRS and a local county sheriff's department, threatening arrest and demanding payment for alleged tax violations.

294. On or about August 27, 2015, HGLOBAL Callers directed victim Luis D. to wire four (4) separate money amounts ($700, $1,950, $1,900, and $1,900) via MoneyGram to an individual with the initials J.D. to four (4) different locations in the Fort Meyers, FL area.

295. On or about March 3, 2016, HARSH PATEL possessed on his phone an image of two fraudulent Mississippi driver's licenses, one in the name of J.D. and one in the name of an individual with the initials R.P. Both driver's licenses contained the same photograph of

PRAFUL PATEL.

Carlo C.

296. On or about June 4, 2015 and continuing through on or about October 17, 2015, WORLDWIDE SOLUTION Callers telephonically extorted victim Carlo C., residing in Brooklyn, NY, of $121,166 by fraudulently purporting to be IRS employees, threatening arrest and demanding payment for alleged tax violations.

297. From on or about June 4, 2015 through October 16, 2015, WORLDWIDE SOLUTION Callers directed victim Carlo C. to make payments into approximately 20 different bank accounts and to send two (2) wire transfers via Western Union.

298. On or about August 6, 2015, WORLDWIDE SOLUTION Callers also directed victim Carlo C. to purchase a cashier's check for $8,000 payable to BHAVESH PATEL and to deposit the check into BHAVESH PATEL's bank account.

299. On or about October 17, 2015, WORLDWIDE SOLUTION Callers told victim Carlo C. to send copies of his receipts and money orders to "MR BHVESH (sic), 1100 N Riata St, Gilbert AZ 85234", the residential address of BHAVESH PATEL.

Antonio S. & Tina E.

300. On or about March 11, 2015, VINEET VASHISTHA (a.k.a. VINEET SHARMA) using sharmabposervices@yahoo.com received an email from a conspirator operating info@tirthinformatics.in. The email contained the user name, password, and Domain IP address for five (5) VoIP telephone numbers, all of which contained the 202 area code. The user name and password for one of the telephone numbers, (202) 602-1426, were both listed as

"vinitsharma006". The user name and password for another of the telephone numbers, (202) 602-1339, were listed as "vinitsharma007".

301. On or about March 16, 2015, SHARMA BPO Callers, using telephone number (202) 602-1426, extorted victim Antonio S., residing in North Las Vegas, NV, of $1,299 by fraudulently purporting to be IRS employees, threatening arrest and demanding payment for alleged tax violations.

302. On or about March 16, 2015, SHARMA BPO Callers directed victim Antonio S. to send three (3) MoneyGram wire transfers in the amounts of $500, $499, and $300 to a GPR card.

303. From on or about March 19, 2015 to on or about March 20, 2015, SHARMA BPO Callers using telephone number (202) 602-1339 extorted victim Tina E., residing in Auburn, ME, of $19,232 by fraudulently purporting to be IRS employees, threatening arrest and demanding payment for alleged tax violations.

304. From on or about March 19, 2015 to on or about March 20, 2015, SHARMA BPO Callers directed victim Tina E. to make two (2) deposits into a BOA account controlled by a conspirator totaling $12,432. SHARMA BPO Callers directed victim Tina E. to purchase $6,300 in money orders and mail them to a conspirator in Greenwood, SC.

COUNT TWO
18 U.S.C. § 1349
(Wire Fraud Conspiracy)

1. Paragraphs 1 to 10 and 12 to 21 of Count One and of this Indictment are realleged and incorporated as though fully set forth herein.

2. Beginning in or about January 2012, the exact date being unknown to the Grand Jury, and continuing through in or about the date of the Indictment, in the Southern District of Texas and elsewhere, the defendants, **[1] HGLOBAL, [2] CALL MANTRA, [3] WORLDWIDE SOLUTION, [4] ZORIION COMMUNICATIONS PVT. LTD., [5] SHARMA BPO SERVICES, [6] HITESH MADHUBHAI PATEL, [7] HARDIK ARVINDBHAI PATEL, [8] JANAK GANGARAM SHARMA, [9] TILAK SANJAYBHAI JOSHI, [10] SAURIN JAYESHKUMAR RATHOD, [11] TARANG RANCHHODBHAI PATEL, [12] KUSHAL NIKHILBHAI SHAH, [13] KARAN JANAKBHAI THAKKAR, [14] MANISH BALKRISHNA BHARAJ, [15] RAJPAL VASTUPAL SHAH, [16] SAGAR THAKAR, [17] CYRIL JHON DANIEL, [18] JATIN VIJAYBHAI SOLANKI, [19] JERRY NORRIS, [20] NISARG PATEL, [21] MITESHKUMAR PATEL, [22] RAJUBHAI BHOLABHAI PATEL, [23] ASHVINBHAI CHAUDHARI, [24] FAHAD ALI, [25] JAGDISHKUMAR CHAUDHARI, [26] BHARATKUMAR PATEL, [27] ASMITABEN PATEL, [28] VIJAYKUMAR PATEL, [29] MONTU BAROT, [30] PRAFUL PATEL, [31] ASHWINBHAI KABARIA, [32] DILIPKUMAR RAMANLAL PATEL, [33] NILAM PARIKH, [34] DILIPKUMAR AMBAL PATEL, [35] VIRAJ PATEL, [36] ABHISHEK RAJDEV TRIVEDI, [37] SAMARTH KAMLESHBHAI**

PATEL, [38] HARSH PATEL, [39] AALAMKHAN SIKANDERKHAN, [40] JAYKUMAR RAJANIKANT JOSHI, [41] ANJANEE PRADEEPKUMAR SHETH, [42] KUNAL CHATRABHUJ NAGRANI, [43] SUBISH SURENRAN EZHAVA, [44] SUNNY TARUNKUMAR SUREJA, [45] SUNNY JOSHI, [46] RAJESH BHATT, [47] NILESH PANDYA, [48] TARUN DEEPAKBHAI SADHU, [49] VISHALKUMAR RAVI GOUNDER, [50] BHAVESH PATEL, [51] RAMAN PATEL, [52] RAJESH KUMAR UN, [53] ANIRUDDH RAJESHKUMAR CHAUHAN, [54] RAHUL TILAK VIJAY DOGRA, [55] VICKY RAJKAMAL BHARDWAJ, [56] CLINTWIN JACOB CHRISSTIAN, [57] ANEESH ANTONY PADIPURIKAL, [58] JATANKUMAR HARESHKUMAR OZA, [59] RAJKAMAL OMPRAKASH SHARMA, [60] VINEET DHARMENDRA VASISHTHA, and [61] GOPAL VENKATESAN PILLAI, unlawfully and knowingly did combine, conspire, confederate and agree together, and with each other and others known and unknown, to violate Title 18, United States Code, Section 1343.

3. It was a part and an object of the conspiracy that the defendants, and others known and unknown, having devised and intending to devise a scheme and artifice to defraud, and for obtaining money and property by means of false and fraudulent pretenses, representations or promises, would and did transmit and cause to be transmitted by means of wire, radio, and television communication in interstate and foreign commerce writings, signs, signals, pictures, and sounds for the purpose of executing such scheme and artifice, to wit, defendants and others known and unknown, placed telephone calls from a place outside of the United States to victims inside the United States to represent themselves to be officials of state

and federal agencies and thereby extort the payment of funds through the use of interstate electronic payments.

All in violation of Title 18, United States Code, Section 1349.

COUNT THREE
18 U.S.C. § 1956(h)
(Money Laundering Conspiracy)

1. Paragraphs 1 to 10 and 12 to 21 of Count One of this Indictment are realleged and incorporated as though fully set forth herein.0

2. Beginning in or about January 2012, the exact date being unknown to the Grand Jury, and continuing through in or about the date of the Indictment, in the Southern District of Texas and elsewhere, the defendants, **[1] HGLOBAL, [2] CALL MANTRA, [3] WORLDWIDE SOLUTION, [4] ZORIION COMMUNICATIONS PVT. LTD., [5] SHARMA BPO SERVICES, [6] HITESH MADHUBHAI PATEL, [7] HARDIK ARVINDBHAI PATEL, [8] JANAK GANGARAM SHARMA, [9] TILAK SANJAYBHAI JOSHI, [10] SAURIN JAYESHKUMAR RATHOD, [11] TARANG RANCHHODBHAI PATEL, [12] KUSHAL NIKHILBHAI SHAH, [13] KARAN JANAKBHAI THAKKAR, [14] MANISH BALKRISHNA BHARAJ, [15] RAJPAL VASTUPAL SHAH, [16] SAGAR THAKAR, [17] CYRIL JHON DANIEL, [18] JATIN VIJAYBHAI SOLANKI, [19] JERRY NORRIS, [20] NISARG PATEL, [21] MITESHKUMAR PATEL, [22] RAJUBHAI BHOLABHAI PATEL, [23] ASHVINBHAI CHAUDHARI, [24] FAHAD ALI, [25] JAGDISHKUMAR CHAUDHARI, [26] BHARATKUMAR PATEL, [27] ASMITABEN PATEL, [28] VIJAYKUMAR PATEL, [29] MONTU BAROT, [30] PRAFUL PATEL, [31] ASHWINBHAI KABARIA, [32] DILIPKUMAR RAMANLAL PATEL, [33] NILAM PARIKH, [34] DILIPKUMAR AMBAL PATEL, [35] VIRAJ PATEL, [36] ABHISHEK RAJDEV TRIVEDI, [37] SAMARTH KAMLESHBHAI**

PATEL, [38] HARSH PATEL, [39] AALAMKHAN SIKANDERKHAN, [40] JAYKUMAR RAJANIKANT JOSHI, [41] ANJANEE PRADEEPKUMAR SHETH, [42] KUNAL CHATRABHUJ NAGRANI, [43] SUBISH SURENRAN EZHAVA, [44] SUNNY TARUNKUMAR SUREJA, [45] SUNNY JOSHI, [46] RAJESH BHATT, [47] NILESH PANDYA, [48] TARUN DEEPAKBHAI SADHU, [49] VISHALKUMAR RAVI GOUNDER, [50] BHAVESH PATEL, [51] RAMAN PATEL, [52] RAJESH KUMAR UN, [53] ANIRUDDH RAJESHKUMAR CHAUHAN, [54] RAHUL TILAK VIJAY DOGRA, [55] VICKY RAJKAMAL BHARDWAJ, [56] CLINTWIN JACOB CHRISSTIAN, [57] ANEESH ANTONY PADIPURIKAL, [58] JATANKUMAR HARESHKUMAR OZA, [59] RAJKAMAL OMPRAKASH SHARMA, [60] VINEET DHARMENDRA VASISHTHA, and [61] GOPAL VENKATESAN PILLAI, knowingly combined, conspired, confederated and agreed with each other and with other persons, both known and unknown to the Grand Jury, to commit offense against the United States in violation of Title 18, United States Code, Section 1956, to wit:

To knowingly conduct and attempt to conduct financial transactions affecting interstate commerce and foreign commerce, which transactions involved the proceeds of specified unlawful activity, that is, the scheme to commit wire fraud in violation of Title 18, United States Code, Section 1343, knowing that the transactions were designed in whole or in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, and that while conducting and attempting to conduct such financial transactions, knew that the property involved in the financial transactions represented the

proceeds of some form of unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

All in violation of 18, United States Code, Sections 1956(h) and 1956(a)(1)(B)(i).

COUNT FOUR
18 U.S.C. § 1542
(False Statement in Application for Passport)

1. On or about April 29, 2008, within the Southern District of Texas,

SUNNY MAHASHANKAR JOSHI
a.k.a. "SHARAD ISHWARLAL JOSHI"

did willfully and knowingly make a false statement in an application for a passport with intent to induce and secure for his own use the issuance of a passport under the authority of the United States, contrary to the laws regulating the issuance of such passports and the rules prescribed pursuant to such laws, in that in such U.S. Passport Book application the defendant stated "no" to the question of whether he had ever used a different name, which statement he knew to be false, in violation of Title 18, United States Code, Section 1542.

COUNT FIVE
18 U.S.C. § 1542
(False Statement in Use of Passport)

1. On or about October 5, 2010, within the Southern District of Texas,

SUNNY MAHASHANKAR JOSHI
a.k.a. "SHARAD ISHWARLAL JOSHI"

did willfully and knowingly use and attempt to use any passport, the issue of which was secured in any way by reason of any false statement, namely that in an application for a U.S. Passport Card the defendant provided passport number 444824645, which the defendant knew to be the number of a passport fraudulently obtained, in violation of Title 18, United States Code, Section 1542.

Forfeiture Allegations

NOTICE OF CRIMINAL FORFEITURE
(18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c))

1. Pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), the United States gives notice to the defendants charged in Counts One, Two, Four and Five of this Indictment, that upon conviction of the conspiracy charged in Count One, the wire fraud conspiracy charged in Count Two, or a violation of 18 U.S.C. § 1542 as charged in Counts Four and Five, all property, real or personal, which constitutes or is derived from proceeds traceable to such offenses, is subject to forfeiture.

NOTICE OF CRIMINAL FORFEITURE
(18 U.S.C. § 982(a)(2)(B))

2. Pursuant to Title 18, United States Code, Section 982(a)(2)(B), the United States gives notice to the defendants charged in Count One that upon conviction of a conspiracy to violate 18 U.S.C. § 1028 or 18 U.S.C. §1029, all property constituting, or derived from, proceeds, obtained directly or indirectly, as a result of such conspiracy is subject to forfeiture.

NOTICE OF CRIMINAL FORFEITURE
(18 U.S.C. § 982(a)(1))

3. Pursuant to Title 18, United States Code, Section 982(a)(1), the United States gives notice to the defendants charged in Count Three that upon conviction of a money laundering conspiracy in violation of 18 U.S.C. § 1956(h), all property, real or personal, involved in such conspiracy, and all property traceable to such property, is subject to forfeiture.

NOTICE OF CRIMINAL FORFEITURE
(18 U.S.C. § 982(a)(6)(A))

4. Pursuant to Title 18, United States Code, Section 982(a)(6)(A), the United States gives notice to defendant, SUNNY MAHASHANKAR JOSHI, a.k.a. "SHARAD ISHWARLAL JOSHI," that upon conviction of a violation of Title 18, United States Code, Section 1542 as charged in Counts Four and Five, the following is subject to forfeiture:

(i) all conveyances, including vessels, vehicles, and aircraft, used in the commission of the offense(s);

(ii) all real and personal property that constitutes, or is derived from or is traceable to the proceeds obtained directly or indirectly from the commission of the offense(s); and

(iii) all real and personal property used to facilitate, or intended to be used to facilitate, the commission of the offense(s).

Money Judgment

5. Defendants are notified that upon conviction, a money judgment may be imposed equal to the total value of the property subject to forfeiture.

Substitute Assets

6. Defendants are notified that in the event that property subject to forfeiture, as a result of any act or omission of defendants,

(i) cannot be located upon the exercise of due diligence;

(ii) has been transferred or sold to, or deposited with, a third party;

(iii) has been placed beyond the jurisdiction of the court;

(iv) has been substantially diminished in value; or

(v) has been commingled with other property that cannot be divided without difficulty,

the United States will seek to forfeit any other property of the defendants up to the total value of the property subject to forfeiture pursuant to Title 21, United States Code, Section 853(p), as incorporated by reference in Title 18, United States Code, Section 982(b) and Title 28, United States Code, Section 2461(c).

A TRUE BILL:

ORIGINAL SIGNATURE ON FILE

FOREPERSON

KENNETH MAGIDSON
UNITED STATES ATTORNEY

S. MARK MCINTYRE
CRAIG M. FEAZEL
Assistant United States Attorneys

LESLIE R. CALDWELL
ASSISTANT ATTORNEY GENERAL

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Houston, Texas
October 19, 2016