

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND

UNITED STATES OF AMERICA

v.

ANGAD SINGH CHANDHOK,

Defendant.

~~CR~~ 19 083 JJM

Criminal Case No. _____

Violation:

18 U.S.C. § 1956(h) - Conspiracy to
Launder Criminal Proceeds

INFORMATION

The United States Attorney charges that:

COUNT 1

(Conspiracy to Launder Criminal Proceeds)

Introduction

At all times relevant to this Information, unless herein stated:

1. Defendant ANGAD SINGH CHANDHOK, an Indian national, lived in Santa Ana, California.

2. Defendant did business out of 10568 Magnolia Avenue, Suite #127, Anaheim, California, and out of his residence, located at 1901 E. 1st Street, Santa Ana, California.

3. Defendant controlled numerous corporations organized in the State of California, including US Offprice, Inc., Orchid Star, Brightway Trading, Inc., Legacy Shipping and Forwarding, Inc., Tirupati General Trading, Inc., Westside Forwarding,

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Inc., Vertigo Travels, Inc., Hemisphere Sales, Inc., and Swift Forwarding, Inc., among others (collectively "the nominee corporations").

4. Defendant controlled bank accounts at J.P. Morgan Chase Bank, N.A., Wells Fargo Bank, N.A., Bank of America, N.A., U.S. Bank, N.A., Pacific City Bank, and MUFG Union Bank, N.A., that were opened in the name of the nominee corporations and individuals hired by the defendant to open bank accounts.

5. Bishwajeet Jha, Sumit Jha, Joshua Lalrempuia, Vishal Chettri, Abhay Mishra, Manish Kalra, D.S., A.R., G.S., and others were Indian nationals who were temporarily in the United States. They opened and caused to be opened bank accounts at TD Bank, N.A., Citizens Bank, N.A., Bank of America, N.A., Santander Bank, M&T Bank, Key Bank and Bank Newport.

The Conspiracy

6. Beginning on a date unknown, but at least as early as in or about December 2017, and continuing until in or about March 27, 2019, in the District of Rhode Island and elsewhere, defendant ANGAD SINGH CHANDHOK, Bishwajeet Jha, Sumit Jha, Joshua Lalrempuia, Vishal Chettri, Abhay Mishra, Manish Kalra, D.S., A.R., G.S., and others known and unknown to the United States Attorney, did knowingly, willfully, and unlawfully combine, conspire and agree with each other to commit offenses against the United States in violation 18 U.S.C. § 1956, to wit:

(a) 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, wire fraud, 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 18 U.S.C. § 1956(a)(1)(B)(i);

(b) to transport, transmit and transfer and attempt to transport, transmit and transfer a monetary instrument and funds from a place in the United States to and through a place outside the United States with the intent to promote the carrying on of specified unlawful activity, that is, wire fraud, in violation of 18 U.S.C. § 1956(a)(2)(A); and,

(c) to transport, transmit, and transfer, and attempt to transport, transmit, and transfer a monetary instrument or funds involving the proceeds of specified unlawful activity, that is, wire fraud, from a place in the United States to or through a place outside the United States, knowing that the funds involved in the transportation, transmission, and transfer represented the proceeds of some form of unlawful activity and knowing that such transportation, transmission, and transfer was designed in whole or in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, in violation of 18 U.S.C.

§ 1956(a)(2)(B)(i).

Manner and Means of the Conspiracy

The manner and means used to accomplish the objectives of the conspiracy and to launder more than \$1,500,000 in fraudulent proceeds included, among others, the following:

7. It was part of the conspiracy that members of the conspiracy received funds from victims who were defrauded as part of a technology support fraud scheme operated out of the United States and India (hereinafter "the tech support scam"). The victims were fraudulently induced to purchase phony technology support for their computers. The victims were also tricked into "returning" money that was falsely represented to have been an overpayment to the victims who had previously purchased technology support.

8. It was further part of the conspiracy that members of the conspiracy opened bank accounts at various banks into which funds from the victims of the tech support scam were deposited.

9. It was further part of the conspiracy that members of the conspiracy withdrew some of the victims' funds, and transferred the remaining funds to bank accounts controlled by Defendant.

10. It was further part of the conspiracy that Defendant concealed his control over the accounts into which victims' funds had been transferred by causing those accounts to be opened in the names of the nominee corporations or individuals hired by Defendant to open bank accounts.

11. It was further part of the conspiracy that Defendant received images of victims' checks, which were payment for technology support. Defendant deposited these checks into bank accounts controlled by him.

12. It was further part of the conspiracy that Defendant commingled victims' funds with other funds received by him to conceal the nature, location, source, ownership, and control of those funds.

13. It was further part of the conspiracy that Defendant withdrew cash from bank accounts into which victims' funds had been transferred or deposited.

14. It was further part of the conspiracy that Defendant transferred victims' funds to bank accounts in India, China and Singapore to promote the tech support scam.

15. It was further part of the conspiracy that Defendant transferred victims' funds to other bank accounts controlled by him to conceal the nature, location, source, ownership, and control of those funds.

Financial Transactions Designed to Promote the Tech Support Scam and to Conceal the Nature, Location, Source, Ownership and Control of the Fraudulent Proceeds

In furtherance of the conspiracy, Defendant and his co-conspirators engaged in the following financial transactions, among others:

16. On or about December 14, 2017, Defendant attempted to deposit Check # 292 made payable to Legacy Inc. in the amount of \$406.58 and drawn on the Santander

Bank account of T.S. of East Greenwich, Rhode Island. Check #292 constituted fraudulent proceeds of the tech support scam and was payment for technology support.

17. On or about July 5, 2018, Defendant caused two checks made payable to "Bridgeway Ent." in the amounts of \$429 and \$499.99 to be deposited into an account controlled by Defendant, JP Morgan Chase Acct. # xxxxx-0299, held in the name of Brightway Trading, Inc. DBA Bridgeway (sic) Int. These checks were fraudulent proceeds of the tech support scam and were payments for technology support.

18. On or about October 4, 2018, D.S., who was located in Virginia, transferred \$22,000 in fraudulent proceeds to an account controlled by Defendant, JP Morgan Chase Acct. # xxxxx-0323, held in the name of Brightway Trading, Inc. DBA Bridgeway (sic) Int. (hereinafter "Bridgeway Ent. Acct. #0323").

19. On or about October 4, 2018, Abhay Mishra, who was located in Connecticut, deposited \$8,800 in fraudulent proceeds into Bridgeway Ent. Acct. #0323.

20. On or about October 18, 2018, Manish Kalra, who was located in New York, transferred \$16,700 in fraudulent proceeds to an account controlled by Defendant, JP Morgan Chase Acct. # xxxxx-8111, held in the name of US Offprice, Inc. (hereinafter "US Offprice Acct. #8111").

21. On or about October 18, 2018, Manish Kalra, who was located in New York, transferred \$19,200 in fraudulent proceeds into Bridgeway Ent. Acct. #0323.

22. On or about October 22, 2018, Abhay Mishra, who was located in Connecticut, transferred \$16,500 in fraudulent proceeds to US Offprice Acct. #8111.

23. On or about October 22, 2018, A.R., who was located in Virginia, transferred \$12,000 in fraudulent proceeds to US Offprice Acct. #8111.

24. On or about October 24, 2018, Bishwajeet Jha, who was located in Rhode Island, transferred \$25,400 in fraudulent proceeds to US Offprice Acct. #8111.

25. On or about October 25, 2018, Sumit Jha, who was located in Rhode Island, transferred \$12,400 in fraudulent proceeds to US Offprice Acct. #8111.

26. On or about October 26, 2018, Defendant transferred \$64,998.44 to Dynamic Exports at Indusind Bank Limited in Mumbai, India.

27. On or about November 9, 2018, Joshua Lalrempuia, who was located in Rhode Island, transferred \$19,600 in fraudulent proceeds to US Offprice Acct. #8111.

28. On or about November 15, 2018, Joshua Lalrempuia, who was located in Rhode Island, transferred \$19,700 in fraudulent proceeds to US Offprice Acct. #8111.

29. On or about November 15, 2018, Defendant transferred \$25,000 from Wells Fargo Acct. # xxxxxxxx-0152 (hereinafter "US Offprice Acct. #0152"), held in the name of US Offprice, Inc., to US Offprice Acct. #8111.

30. On or about November 19, 2018, Defendant transferred \$185,000 from US Offprice Acct. #0152 to US Offprice Acct. #8111.

31. On or about February 5, 2019, G.S., who was located in Idaho, withdrew \$2,000 in fraudulent proceeds from Wells Fargo Acct. # xxxxxxxx-1163, and transferred \$16,000 in fraudulent proceeds to an account controlled by Defendant, JP Morgan Chase Acct. # xxxxx-8799, held in the name of Orchid Star.

32. On or about March 22, 2019, J.S., who was located in Florida, transferred \$19,600 in fraudulent proceeds to an account controlled by Defendant, JP Morgan Chase Acct. # xxxxx-9036, held in the name of "Victor Hernandez DBA Congrex Services Ent."

All in violation of 18 U.S.C. § 1956(h).

AARON WEISMAN
UNITED STATES ATTORNEY



SANDRA R. HEBERT
Assistant U.S. Attorney



WILLIAM J. FERLAND
Criminal Division Chief

Date:

July 29, 2019

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT

BY: INFORMATION INDICTMENT COMPLAINT

CASE NO. ~~19~~ 19 083 JJM
 USA VS.

Matter Sealed: Juvenile Other than Juvenile
 Pre-Indictment Plea Superseding Defendant Added
 Indictment Charges/Counts Added
 Information

Defendant: ANGAD SINGH CHANDHOK

Address: **REDACTED**

Name of District Court, and/or Judge/Magistrate Location (City)
 UNITED STATES DISTRICT COURT RHODE ISLAND
 DISTRICT OF RHODE ISLAND Divisional Office

Name and Office of Person
 Furnishing Information on AARON L. WEISMAN
 THIS FORM U.S. Atty Other U.S. Agency
 Phone No. (401) 709-5000
 Name of Asst. U.S. Attorney SANDRA R. HEBERT
 (if assigned)

Interpreter Required Dialect: _____

Alien applicable

REDACTED

PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)
 HSI - Rachel L. Robinson

- person is awaiting trial in another Federal or State Court (give name of court)
- this person/proceeding transferred from another district per (circle one) FRCP 20, 21 or 40. Show District
- this is a reprosecution of charges previously dismissed which were dismissed on motion of:
 U.S. Atty Defense
- this prosecution relates to a pending case involving this same defendant. (Notice of Related Case must still be filed with the Clerk.)
- prior proceedings or appearance(s) before U.S. Magistrate Judge regarding this defendant were recorded under

SHOW DOCKET NO.

MAG. JUDGE CASE NO.

LDA~19-MJ-015

Place of offense RHODE ISLAND County

DEFENDANT

Issue: Warrant Summons

Location Status:

Arrest Date _____ or Date Transferred to Federal Custody _____

- Currently in Federal Custody
- Currently in State Custody
- Writ Required
- Currently on bond
- Fugitive

Defense Counsel (if any): _____

- FPD CJA RET'D
- Appointed on Target Letter

This report amends AO 257 previously submitted

OFFENSE CHARGED - U.S.C. CITATION - STATUTORY MAXIMUM PENALTIES - ADDITIONAL INFORMATION OR COMMENTS

Total # of Counts 1

| Set | Title & Section/Offense Level (Petty = 1 / Misdemeanor = 3 / Felony = 4) | Description of Offense Charged | Felony/Misd. |
|-----|---|--|--|
| | 18 U.S.C. §§ 1956(h) | Engaged in conspiracy and money laundering | <input checked="" type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor |
| | Imprisonment: 20 years/ Fine: \$500,000 | Supervised Release: 3 years/ Special Assessment: \$100 | <input type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor |
| | | | <input type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor |
| | | | <input type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor |
| | | Trial: 1 week | <input type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor |