

United States District Court

FOR THE
NORTHERN DISTRICT OF CALIFORNIA

VENUE: SAN JOSE

FILED

Aug 07 2024

Mark B. Busby
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO

UNITED STATES OF AMERICA,

V.

SAYEE CHAITANYA REDDY DEVAGIRI,
MATHEUS DUARTE,
MANASWI MANDADAPU, &
HARI VAMSI ANNE

CR 24-00451-PCP (NC)

DEFENDANT(S).

INDICTMENT

18 U.S.C. § 1349 – Conspiracy to Commit Wire Fraud

A true bill.

/s/ Foreperson of the Grand Jury

Foreman

Filed in open court this 7th day of

August, 2024

Brittany Sims
Clerk

Lisa J. Cisneros Bail, \$ no bail warrant
U.S. Magistrate Judge Lisa J. Cisneros

FILED

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NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO

1 ISMAIL J. RAMSEY (CABN 189820)
United States Attorney

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8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA
10 SAN JOSE DIVISION

11	UNITED STATES OF AMERICA,)	CASE NO. 5:24-cr-00451 PCP (NC)
12	Plaintiff,)	<u>VIOLATIONS:</u>
13	v.)	18 U.S.C. § 1349 – Conspiracy to Commit Wire
14	SAYEE CHAITANYA REDDY DEVAGIRI,)	Fraud;
15	MATHEUS DUARTE,)	18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c) –
16	MANASWI MANDADAPU, &)	Forfeiture Allegation
17	HARI VAMSI ANNE,)	
	Defendants.)	

18
19 INDICTMENT

20 The Grand Jury charges:

21 Introductory Allegations

22 At all times relevant to this Indictment:

- 23 1. Defendant SAYEE CHAITANYA REDDY DEVAGIRI was an individual residing in the
- 24 Northern District of California.
- 25 2. Defendant MATHEUS DUARTE was an individual residing in the Northern District of
- 26 California.
- 27 3. Defendant MANASWI MANDADAPU was an individual residing in the Central District
- 28 of California.

INDICTMENT

1 4. Defendant HARI VAMSI ANNE was an individual residing in the Central District of
2 California.

3 5. Entity One was a company headquartered in San Francisco, California. Entity One's
4 business includes providing delivery services to customers throughout Northern California, including
5 Santa Clara County. Entity One's customers can place orders using Entity One's website or application,
6 and individual drivers fulfill those orders by collecting the ordered items from restaurants and other
7 merchants, and delivering them to customers.

8 6. When an order is placed, Entity One's computer systems automatically assign the order
9 to a driver. A driver may accept or reject the order using Entity One's computer systems. Once a
10 delivery is complete, a driver may request payment from Entity One using Entity One's computer
11 systems.

12 7. Certain employees of Entity One can use Entity One's computer systems to reassign an
13 order from one driver to another, or to designate an order as in process or complete.

14 8. Entity Two was a vendor that provided services to Entity One, including facilitating
15 payments to drivers on Entity One's behalf.

16 9. Individual One was an individual employed by Entity One from November 2020 until
17 December 2020. As an employee of Entity One, Individual One had access to Entity One's internal
18 computer systems.

19 10. Individual Two was an individual employed by Entity One in February 2021. As an
20 employee of Entity One, Individual Two had access to Entity One's internal computer systems.

21 COUNT ONE: (18 U.S.C. § 1349 – Conspiracy to Commit Wire Fraud)

22 11. Beginning in or about November 2020 and continuing through or about February 2021, in
23 the Northern District of California and elsewhere, the defendants,

24 SAYEE CHAITANYA REDDY DEVAGIRI,
25 MATHEUS DUARTE,
26 MANASWI MANDADAPU, &
27 HARI VAMSI ANNE,
28

and others, did knowingly conspire to devise and intend to devise a scheme and artifice to defraud as to
a material matter and to obtain money and property by means of materially false and fraudulent

1 pretenses, representations, and promises, and by omission and concealment of material facts, and, for the
2 purpose of executing such scheme or artifice and attempting to do so, transmit, and cause to be
3 transmitted, by means of wire communication in interstate and foreign commerce, certain writings,
4 signs, signals, pictures, and sounds, in violation of Title 18, United States Code, Section 1343.

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

6 The Manner and Means of the Conspiracy

7 12. In order to achieve the objectives of the conspiracy, DEVAGIRI, DUARTE,
8 MANDADAPU, and ANNE, with assistance from others:

- 9 a. Created multiple fraudulent customer and driver accounts with Entity One;
10 b. Used fraudulent customer accounts to place orders for the delivery of food items from
11 restaurants throughout Northern California, including Santa Clara County;
12 c. Used Individual One and Individual Two's access to Entity One's computer systems
13 to reassign the orders placed by the fraudulent customer accounts to fraudulent driver
14 accounts;
15 d. Used the fraudulent driver accounts to falsely report that the orders had been
16 delivered, and to request payment for deliveries that never occurred;
17 e. Used bank accounts controlled by DEVAGIRI, DUARTE, MANDADAPU, ANNE,
18 and others to receive payments; and
19 f. Used Individual One and Individual Two's access to Entity One's computer systems
20 to revert orders from "complete" status to "in process" status, and to assign the orders
21 to fraudulent driver accounts, beginning the process again.

22 13. In this way, DEVAGIRI, DUARTE, MANDADAPU, and ANNE, with assistance from
23 other individuals known and unknown to the Grand Jury, induced Entity Two to make recurring
24 payments on Entity One's behalf for deliveries that never occurred.

25 FORFEITURE ALLEGATION: (18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c))

26 14. The allegations contained in this Indictment are re-alleged and incorporated by reference
27 for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 981(a)(1)(C) and
28 Title 28, United States Code, Section 2461(c).

1 15. Upon conviction for any of the offenses set forth in this Indictment, the defendants,

2 SAYEE CHAITANYA REDDY DEVAGIRI,
3 MATHEUS DUARTE,
4 MANASWI MANDADAPU, &
5 HARI VAMSI ANNE,

6 shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and
7 Title 28, United States Code, Section 2461(c), all property, real or personal, constituting, or derived
8 from proceeds the defendants obtained directly and indirectly, as the result of those violations, including
9 but not limited to the following:

10 a. A money judgment in the amount of \$2,590,195.

11 16. If any of the property described above, as a result of any act or omission of the
12 defendants:

- 13 a. cannot be located upon exercise of due diligence;
- 14 b. has been transferred or sold to, or deposited with, a third party;
- 15 c. has been placed beyond the jurisdiction of the court;
- 16 d. has been substantially diminished in value; or
- 17 e. has been commingled with other property which cannot be divided without
18 difficulty,

19 the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21,
20 United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

21 All pursuant to Title 18, United States Code, Section 981(a)(1)(C), Title 28, United States Code,

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1 Section 2461(c), and Federal Rule of Criminal Procedure 32.2.

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3 DATED: August 7, 2024

A TRUE BILL.

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/s/Foreperson

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FOREPERSON
San Francisco, California

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ISMAIL J. RAMSEY
United States Attorney

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s/ Michael G. Pitman

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MICHAEL G. PITMAN

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JEFFREY D. NEDROW

Assistant United States Attorneys

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