

FILED
U.S. DISTRICT COURT
DISTRICT OF NEBRASKA
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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	4:22-CR-03077-JMG-CRZ
)	
vs.)	SUPERSEDING INDICTMENT
)	
NEIL SURESH CHANDRAN and)	18 U.S.C. § 1349
BRYAN LEE,)	18 U.S.C. § 1341
)	18 U.S.C. § 1343
Defendants.)	18 U.S.C. § 1957
)	18 U.S.C. § 2
)	

The Grand Jury Charges:

INTRODUCTION

At times material herein:

RELEVANT INDIVIDUALS AND ENTITIES

1. Defendant NEIL SURESH CHANDRAN was a resident of Las Vegas, Nevada. CHANDRAN held himself out as the owner of a group of companies operated under the banner of ViRSE, which purported to develop virtual-world technologies, including its own cryptocurrency, for use in its metaverse. These companies included, but are not limited to, FreeVi Lab; Studio Vi, Inc.; ViDelivery, Inc.; ViMarket, Inc. (“ViMarket”); and Skalex USA Inc. (collectively, “the CHANDRAN companies”). CHANDRAN repeatedly claimed that one or more of the CHANDRAN companies was about to be purchased by a consortium of wealthy buyers and thereby yield his investors extremely high returns.

2. Defendant BRYAN LEE was a resident of Las Vegas, Nevada. LEE was the signatory on bank accounts for ViMarket, and the nominee owner/sole director and officer of ViMarket. LEE took direction from CHANDRAN on how to disburse funds sent to ViMarket bank accounts. LEE also unilaterally disbursed and spent funds from the ViMarket accounts.

3. Michael Glaspie was a resident of Palm City, Florida. Glaspie marketed an investment opportunity with the CHANDRAN companies under the name “CoinDeal” or “Coin Deal” (hereinafter “CoinDeal”) through a website in his own name. He collected investor funds for the CHANDRAN companies through various entities, including AEO Publishing, Inc.; Banner Co-Op, Inc.; and BannersGo, LLC (“BannersGo”), and then transferred the funds to the CHANDRAN companies.

4. Individual 1 was a resident of Lincoln, Nebraska, in the District of Nebraska. Individual 1 assisted Glaspie in raising money for CoinDeal and by transferring investor money raised by Glaspie to the CHANDRAN companies through his bank accounts and charges to credit cards in Individual 1’s name that would be paid off with investor funds.

5. Billionaire 1 was the founder and executive chairman of a large online retailing company. Billionaire 1 had no involvement with CHANDRAN, LEE, Glaspie, Individual 1, or the CHANDRAN companies.

6. Billionaire 2 was the founder and CEO of an electric car company. Billionaire 2 had no involvement with CHANDRAN, LEE, Glaspie, Individual 1, or the CHANDRAN companies.

THE CONSPIRACY AND SCHEME AND ARTIFICE TO DEFRAUD

7. Beginning in or around June 2018 and continuing until on or about June 29, 2022, the exact dates being unknown to the Grand Jury, in the District of Nebraska and elsewhere, CHANDRAN, LEE, and others known and unknown to the Grand Jury, conspired and agreed with each other to engage in a scheme to defraud investors in the CHANDRAN companies through misrepresentations about the CHANDRAN companies and how investor funds would be used.

PURPOSE OF THE CONSPIRACY AND SCHEME AND ARTIFICE TO DEFRAUD

8. The purpose of the conspiracy and the scheme was for CHANDRAN, LEE, and others known and unknown to the Grand Jury, to (a) unlawfully enrich themselves by obtaining funds from investors through false promises of extremely high returns; (b) conceal or cause to conceal from investors the true status of their investments and the likelihood that they would obtain the promised returns; and (c) conceal or cause to conceal from the investors the manner in which CHANDRAN, LEE, and others were using investor funds.

MANNER AND MEANS OF THE CONSPIRACY AND SCHEME AND ARTIFICE TO DEFRAUD

9. The ways, manners, and means of the conspiracy and scheme to defraud included, but were not limited to, the following:

a. CHANDRAN caused Glaspie and Individual 1 to solicit funds from investors for the CHANDRAN companies based on the materially false and misleading promise and representation that their investments would soon yield extremely high returns when one or more of the CHANDRAN companies were purchased by a consortium of wealthy buyers (“the Transactions”), when in truth and in fact, there was no consortium about to purchase CHANDRAN’s company or companies at an amount that would yield the promised returns.

b. CHANDRAN made or caused Glaspie and Individual 1 to make materially false and misleading representations to investors that their funds would be used for covering normal expenses enabling one or more of the CHANDRAN companies to continue operating until the Transactions closed and to show the supposed buyers that CHANDRAN’s company or companies had sufficient “cash on hand” to be successful, when in truth and in fact, substantial amounts of investor funds were misappropriated to launch other business ventures and for the

personal benefit of CHANDRAN and LEE and others, including the purchase of luxury cars and real estate.

c. CHANDRAN caused Glaspie and Individual 1 to make materially false and misleading representations regarding the involvement of prominent business figures, such as Billionaire 1 and Billionaire 2, in the Transactions, when in truth and in fact, such individuals had no involvement.

d. CHANDRAN caused Glaspie and Individual 1 to raise funds from investors on his behalf. CHANDRAN provided materially false and misleading information about the Transactions' timeline and likely profitability to Individual 1, who then passed it along to Glaspie, who in turn disseminated it to current and prospective investors—at each step by interstate wire communications. On at least one occasion, CHANDRAN joined a conference call with CoinDeal investors to give them false assurance that the Transactions would imminently close.

e. Investors typically transferred funds to accounts under Glaspie's control or the control of Glaspie's relatives. These transfers occurred primarily through credit cards, wire transfers, or virtual currency. Funds were often then transferred to bank accounts under Individual 1's control before being distributed to the CHANDRAN companies, including bank accounts controlled by LEE. At times, Glaspie transferred investor funds directly from accounts he or his relatives controlled to the CHANDRAN companies. Transfers from Glaspie's accounts and Individual 1's accounts to the CHANDRAN companies were, at times, done through cashier's checks sent by interstate mail, which were then deposited into accounts held in the name of the CHANDRAN companies.

f. After deciding to purchase homes for personal use with investor funds, CHANDRAN and LEE, in an effort to justify their misappropriations, decided they would have to

build three-dimensional models of the homes so they could be featured in the metaverse CHANDRAN and the CHANDRAN companies were supposedly creating.

g. As a result of the conspiracy and scheme, CHANDRAN, LEE, and their associates fraudulently obtained more than \$45 million in fiat and virtual currency from more than 10,000 investors.

COUNT 1

(Conspiracy to Commit Mail and Wire Fraud)

10. Paragraphs 1 through 9, including all subparagraphs, of this Superseding Indictment are realleged and incorporated by reference as if fully set forth herein.

11. From in or around June 2018 until on or about June 29, 2022, in the District of Nebraska, and elsewhere, Defendants

NEIL SURESH CHANDRAN and

BRYAN LEE

did knowingly and intentionally, that is, with the intent to advance the conspiracy, combine, conspire, and agree with other individuals known and unknown to the Grand Jury, to commit the offenses of:

(a) mail fraud that is, to voluntarily and intentionally, with the intent to defraud, devise and intend to devise a scheme and artifice to defraud and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, and, for the purpose of executing the scheme and artifice to defraud, caused to be delivered mail matter by the Postal Service and private and commercial interstate carrier, in violation of Title 18, United States Code, Section 1341; and

(b) wire fraud, that is, to voluntarily and intentionally, with the intent to defraud, devise and intend to devise a scheme and artifice to defraud and to obtain money and property by means

of materially false and fraudulent pretenses, representations, and promises, and, for the purpose of executing the scheme and artifice to defraud, transmitted, and caused to be transmitted, by means of wire communication in interstate and foreign commerce, certain writings, signs, signals, pictures, and sounds, in violation of Title 18, United States Code, Section 1343.

Purpose of the Conspiracy

12. The allegations in paragraph 8 are realleged and incorporated by reference as a description of the Purpose of the Conspiracy.

Manner and Means of the Conspiracy

13. The allegations in paragraph 9, including all subparagraphs, are realleged and incorporated by reference as a description of the Manner and Means of the Conspiracy.

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

COUNTS 2-3
(Mail Fraud)

14. Paragraphs 1 through 9, including all subparagraphs, of this Superseding Indictment are realleged and incorporated by reference as if fully set forth herein.

15. Beginning in or around June 2018 and continuing until on or about June 29, 2022, the exact dates being unknown to the Grand Jury, in the District of Nebraska and elsewhere, Defendants

NEIL SURESH CHANDRAN and

BRYAN LEE

along with others known and unknown to the Grand Jury, did voluntarily and intentionally, with the intent to defraud, devise and intend to devise a scheme and artifice to defraud and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises.

Purpose of the Scheme and Artifice

16. The allegations in paragraph 8 are realleged and incorporated by reference as a description of the Purpose of the Scheme and Artifice.

Manner and Means of the Scheme and Artifice

17. The allegations in paragraph 9, including all subparagraphs, are realleged and incorporated by reference as a description of the Manner and Means of the Scheme and Artifice.

Mailings

18. On or about the dates set forth in the table below, within the District of Nebraska and elsewhere, for the purpose of executing and attempting to execute the above-described scheme and artifice to defraud, Defendants NEIL SURESH CHANDRAN and BRYAN LEE aided, abetted, induced, counseled, and encouraged by others known and unknown to the Grand Jury, caused to be delivered mail matter by the Postal Service and a private and commercial interstate carrier, each mailing constituting a separate count, as set forth below:

Count	Date	Description of Mailing
2	4/21/21	UPS envelope containing personal check in the amount of \$425,000 sent by Individual 1 from District of Nebraska to Las Vegas, Nevada
3	4/27/21	UPS envelope containing cashier's check in the amount of \$1,875,000 sent by Individual 1 from District of Nebraska to Las Vegas, Nevada

All in violation of Title 18, United States Code, Sections 1341 and 2.

COUNTS 4-6
(Wire Fraud)

19. Paragraphs 1 through 9, including all subparagraphs, of this Superseding Indictment are realleged and incorporated by reference as if fully set forth herein.

20. Beginning in or around June 2018 and continuing until on or about June 29, 2022, the exact dates being unknown to the Grand Jury, in the District of Nebraska and elsewhere, Defendants

NEIL SURESH CHANDRAN and

BRYAN LEE

along with others known and unknown to the Grand Jury, did voluntarily and intentionally, with the intent to defraud, devise and intend to devise a scheme and artifice to defraud and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises.

Purpose of the Scheme and Artifice

21. The allegations in paragraph 8 are realleged and incorporated by reference as a description of the Purpose of the Scheme and Artifice.

Manner and Means of the Scheme and Artifice

22. The allegations in paragraph 9, including all subparagraphs, are realleged and incorporated by reference as a description of the Manner and Means of the Scheme and Artifice.

Use of Wires

23. On or about the dates set forth in the table below, within the District of Nebraska and elsewhere, for the purpose of executing and attempting to execute the above-described scheme and artifice to defraud, the below-identified defendants, aided, abetted, induced, counseled, and encouraged by others known and unknown to the Grand Jury, transmitted and caused to be

transmitted by means of wire communications in interstate and foreign commerce the writings, signs, signals, pictures, and sounds, each wire communication constituting a separate count, as set forth below:

Count	Defendant	Date	Description of Wire
4	NEIL SURESH CHANDRAN	7/2/2019	Email from CHANDRAN to Individual 1, routed into the District of Nebraska from outside the state of Nebraska, falsely stating that an \$88,000 investment would correspond to a \$2 trillion “bonus” return
5	NEIL SURESH CHANDRAN	10/24/2020	Conference call with an audience of investors and potential investors attended by CHANDRAN, Glaspie, and Individual 1, who was located in the District of Nebraska
6	NEIL SURESH CHANDRAN & BRYAN LEE	3/30/2021	Electronic transfer of \$50,000 from an account at JPMorgan Chase Bank, NA ending in 8639 in the name of BannersGo to Individual 1’s account at First National Bank of Omaha ending in 5048 routed from outside the state of Nebraska into the District of Nebraska

All in violation of Title 18, United States Code, Sections 1343 and 2.

COUNTS 7-9

(Engaging in Monetary Transactions in Property Derived from Specified Unlawful Activity)

24. Paragraphs 1 through 9, including all subparagraphs, of this Superseding Indictment are realleged and incorporated by reference as if fully set forth herein.

25. On or about the dates set forth in the table below, within the District of Nebraska and elsewhere, Defendants NEIL SURESH CHANDRAN and BRYAN LEE knowingly engaged and attempted to engage, and caused and aided and abetted others in engaging, in monetary transactions affecting interstate and foreign commerce in criminally derived property of a value greater than \$10,000, such property having been derived from a specified unlawful activity, that is, mail fraud, in violation of Title 18, United States Code, Section 1341; and wire fraud, in

violation of Title 18, United States Code, Section 1343, each transaction constituting a separate count, as set forth below:

Count	Date	Description of Monetary Transaction
7	6/01/2021	Electronic transfer of \$1,544,146.30 from account at JPMorgan Chase ending in 6531 in the name of ViMarket to title company for purchase of 404 North Royal Ascot Drive, Las Vegas, Nevada.
8	6/21/2021	Electronic transfer of \$1,856,438.44 from account at JPMorgan Chase ending in 6531 in the name of ViMarket to title company for purchase of 78 Innisbrook Avenue, Las Vegas, Nevada
9	10/15/2021	Issuance of cashier's check in the amount of \$900,000 within the District of Nebraska from Individual 1's account at Bank of the West ending in 0083, made out to an escrow company for the purchase 9000 West Third Street #104, Los Angeles, California

All in violation of Title 18, United States Code, Sections 1957 and 2.

FORFEITURE

The Grand Jury further finds that there is probable cause that the following assets are subject to forfeiture based on the allegations in this Superseding Indictment:

Conspiracy to Commit Mail and Wire Fraud

Mail Fraud

Wire Fraud

1. The allegations contained in Counts One through Six of this Superseding Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

2. Upon conviction of the offenses in violation of Title 18, United States Code, Section 1349, 1341, and 1343 as set forth in Counts One through Six of this Superseding Indictment, Defendants NEIL SURESH CHANDRAN and BRYAN LEE shall forfeit to the

United States of America, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the offenses. The property to be forfeited includes, but is not limited to, the following:

- a. All funds and assets on deposit in Account xxxx0976 at America First Credit Union, including, but not limited to \$545,900;
- b. All funds and assets on deposit in Account xxxx9542 at America First Credit Union, including, but not limited to \$219,000;
- c. All funds and assets on deposit in Account xxxxxxxx0676 at Bank of America, including, but not limited to \$18,600;
- d. All funds and assets on deposit in Account xxxxxxxx0689 at Bank of America, including, but not limited to \$18,700;
- e. All funds and assets on deposit in Account xxxxxxxx6772 at Bank of America, including, but not limited to \$2,276,000;
- f. All funds and assets on deposit in Account xxxxxxxx9847 at Bank of America, including, but not limited to \$271,000;
- g. All funds and assets on deposit in Account xxxxx0083 at Bank of the West, including, but not limited to \$2,717,000;
- h. All funds and assets on deposit in Account xxxxx8735 at Bank of the West, including, but not limited to \$2,087,000;
- i. All funds and assets on deposit in Account xxxxx9063 at Bank of the West, including, but not limited to \$561,500;

j. All funds and assets on deposit in Account xxxxx1190 at Bridge Community Bank, including, but not limited to \$53,000;

k. All funds and assets on deposit in Account xxxxx2160 at Capital One, including, but not limited to \$98,400.

l. All funds and assets on deposit in Account xxxxxx2963 at Huntington National Bank, including, but not limited to \$10,102,000;

m. All funds at assets on deposit in Account xxxxxxx1611 at Huntington National Bank, including, but not limited to \$6,034,000;

n. All right, title, and interest in variable annuity account xxxxxx4504 at Jackson National Life Insurance Company, including but not limited to \$200,000;

o. All funds and assets on deposit in Account xxxxx8668 at JPMorgan Chase, including, but not limited to \$269,000;

p. All funds and assets on deposit in Account xxxxx2360 at JP Morgan Chase, including, but not limited to \$600,000;

q. All funds and assets on deposit in Account xxxxx5012 at JPMorgan Chase, including but not limited to \$350,000;

r. All funds and assets on deposit in Account xxxxxxx456-2 at Liberty First Credit Union, including but not limited to \$51,200;

s. All right, title, and interest in annuity account xxxxx2843 at MassMutual, including but not limited to \$450,000;

t. All funds and assets on deposit in Account xxxxxxx70-08 at Nevada Credit Union, including but not limited to \$92,500;

u. All funds and assets on deposit in Account xxxxxx3703 at Pacific Premier Bank, including but not limited to \$5,564,800;

v. All funds and assets on deposit in Account xxxxxx1059 at Pacific Premier Bank, including but not limited to \$650,000;

w. All funds and assets on deposit in Account xxxxxx1686 at Seacoast National Bank, including but not limited to \$299,980;

x. All right, title, and interest in Account xxx-xx9574 a TD Ameritrade, including but not limited to \$100,000;

y. All funds and assets on deposit in Account xxxxx2403 at Wells Fargo, including but not limited to \$102,000;

z. All funds and assets on deposit in Account xxxxxx8040 at Wells Fargo, including but not limited to \$2,444,000;

aa. All funds and assets on deposit in Account xxxxxx5033 at Wells Fargo, including but not limited to \$7,950;

bb. All funds and assets on deposit in Account xxxxxx4312 at Wells Fargo, including but not limited to \$192,000;

cc. All right, title, and interest in the real property and appurtenances commonly known as 207 Mojave Lane, Henderson, Nevada 89015;

dd. All right, title, and interest in the real property and appurtenances commonly known as 404 North Royal Ascot Drive, Las Vegas, Nevada 89144;

ee. All right, title, and interest in the real property and appurtenances commonly known as 718 South Corrida Drive, Covina, California 91724;

ff. All right, title, and interest in the real property and appurtenances commonly known as 78 Innisbrook Avenue, Las Vegas, NV 89113;

gg. All right, title, and interest in the real property and appurtenances commonly known as 9000 West Third Street #104, Los Angeles, California 90048;

hh. All right, title, and interest in a mobile home described as a Cavco Industries WDL-6628A model with serial numbers CAVAZL20510315X and CAVAZL20510315U, believed to be located at 1451 Parker Dam Road, #149, Parker Dam, California 92267;

ii. All right, title, and interest in a 2008 Roadtrek Adventurous with Vehicle Identification Number (VIN) WDYPE845675178064;

jj. All right, title, and interest in a Ferrari F12 with VIN undetermined;

kk. All right, title, and interest in a 2017 Land Rover Range Rover with VIN SALGS2FE0HA365994;

ll. All right, title, and interest in a 2018 Rolls Royce Wraith with VIN SCA665C55JUX86960;

mm. All right, title, and interest in a 2019 Ford F-150 with VIN 1FTEW1E55KKF32723;

nn. All right, title, and interest in a 2019 Ford F-250 with VIN 1FT7W2BT4KEF80083;

oo. All right, title, and interest in a 2019 Malibu 23LSV boat with Hull Identification Number MB2S2065C919 and accompanying trailer with VIN 59XBB2625KL003966;

pp. All right, title, and interest in a 2020 Porsche Taycan Turbo with VIN WP0AC2Y14LSA71220;

qq. All right, title, and interest in a 2020 Tesla Model 3 with VIN 5YJ3E1EA6LF806811;

rr. All right, title, and interest in a 2020 Tesla Model X with VIN 5YJXCDE45LF305573;

ss. All right, title, and interest in a 2020 Tesla Model Y with VIN 5YJYGDEFXLF043320;

tt. All right, title, and interest in a 2021 Audi E-Tron Quattro with VIN WA1VABGE2MB030413;

uu. All right, title, and interest in a 2021 Audi E-Tron Sportback with VIN WA11AAGEXMB000732;

vv. All right, title, and interest in a 2021 Ford Mustang Mach E with VIN 3FMTK3RM2MMA39654;

ww. All right, title, and interest in a 2021 GMC Sierra 2500 HD with VIN 1GT49REYXMF224812;

xx. All right, title, and interest in a 2021 Grand Design Momentum 21G Recreational Vehicle Travel Trailer with VIN 573TM2724M1213482;

yy. All right, title, and interest in a 2021 Grand Design Momentum 31G Recreational Vehicle Travel Trailer with VIN 573TM3521M1213965;

zz. All right, title, and interest in a 2021 Mercedes Benz GLC 300 with VIN W1N0J8EB2MF989128;

aaa. All right, title, and interest in a 2021 Mercedes Benz GLE with VIN 4JGFD6BB1MA480206;

bbb. All right, title, and interest in a 2021 Tesla Model 3 with VIN 5YJ3E1EA5MF052818;

ccc. All right, title, and interest in a 2021 Tesla Model 3 with VIN 5YJ3E1EA5MF066704;

ddd. All right, title, and interest in a 2021 Tesla Model 3 with VIN 5YJ3E1EB2MF010132;

eee. All right, title, and interest in a 2021 Tesla Model 3 with VIN 5YJ3E1EB3MF035430;

fff. All right, title, and interest in a 2021 Tesla Model 3 with VIN 5YJ3E1EB5MF872485;

ggg. All right, title, and interest in a 2021 Tesla Model 3 with VIN 5YJ3E1EB5MF936587;

hhh. All right, title, and interest in a 2021 Tesla Model 3 with VIN 5YJ3E1EB6MF035020;

iii. All right, title, and interest in a 2021 Tesla Model 3 with VIN 5YJ3E1EB9MF862977;

jjj. All right, title, and interest in a 2021 Tesla Model 3 with VIN 5YJ3E1EC2MF000936;

kkk. All right, title, and interest in a 2021 Tesla Model 3 with VIN 5YJ3E1EC3MF976112;

lll. All right, title, and interest in a 2021 Tesla Model 3 with VIN 5YJ3E1EC9MF083345;

mmm. All right, title, and interest in a 2021 Tesla Model S with VIN 5YJSA1E43MF423380;

nnn. All right, title, and interest in a 2021 Tesla Model S with VIN 5YJSA1E65MF443731;

ooo. All right, title, and interest in a 2021 Tesla Model S with VIN 5YJSA1E66MF439848;

ppp. All right, title, and interest in a 2021 Tesla Model S with VIN 5YJSA1E69MF433767;

qqq. All right, title, and interest in a 2021 Tesla Model Y with VIN 5YJYGAE0MF281247;

rrr. All right, title, and interest in a 2021 Tesla Model Y with VIN 5YJYGAE1MF303434;

sss. All right, title, and interest in a 2021 Tesla Model Y with VIN 5YJYGAE3MF286328;

ttt. All right, title, and interest in a 2021 Tesla Model Y with VIN 5YJYGAE9MF189215;

uuu. All right, title, and interest in a 2021 Tesla Model Y with VIN 5YJYGAE9MF283918;

vvv. All right, title, and interest in a 2021 Tesla Model Y with VIN 5YJYGDEE2MF151780;

www. All right, title, and interest in a 2021 Tesla Model Y with VIN 5YJYGDEE2MF240314;

xxx. All right, title, and interest in a 2021 Tesla Model Y with VIN 5YJYGDEE3MF111661;

yyy. All right, title, and interest in a 2021 Tesla Model Y with VIN 5YJYGDEE3MF119677;

zzz. All right, title, and interest in a 2021 Tesla Model Y with VIN 5YJYGDEE4MF139923;

aaaa. All right, title, and interest in a 2021 Tesla Model Y with VIN 5YJYGDEE6MF271680;

bbbb. All right, title, and interest in a 2021 Tesla Model Y with VIN 5YJYGDEE9MF176837;

cccc. All right, title, and interest in a 2021 Tesla Model Y with VIN 5YJYGDEEXMF091814;

dddd. All right, title, and interest in a 2021 Tesla Model Y with VIN 5YJYGDEF2MF250737;

eeee. All right, title, and interest in a 2021 Tesla Model Y with VIN 5YJYGDEF6MF294689;

ffff. All right, title, and interest in a 2021 Volkswagen ID.4 with VIN WVGDMPE25MP020844;

gggg. All right, title, and interest in a 2021 Volkswagen ID.4 with VIN WVGRMPE28MP042293;

hhhh. All right, title, and interest in a 2021 Volvo XC40 with VIN YV4ED3UR9M2583339;

iiii. All right, title, and interest in a 2021 Volvo XC40 with VIN YV4ED3URXM2565805;

jjjj. All right, title, and interest in a 2022 Audi RS E-Tron with VIN WAUAHBFW4N7901047;

kkkk. All right, title, and interest in a 2022 Can-Am Maverick Max X RS side-by-side vehicle with VIN 3JBVNAV45NE000666;

llll. All right, title, and interest in a 2022 Chevrolet Bolt EUV with VIN 1G1FZ6S03N4107200;

mmmm. All right, title, and interest in a 2022 Mini Cooper with VIN WMW13DJ04N2R35614;

nnnn. All right, title, and interest in a 2022 Porsche Taycan Cross Turismo with VIN WP0BA2Y13NSA67236;

oooo. All right, title, and interest in a 2022 Tesla Model 3 with VIN 5YJ3E1EB4NF137966;

pppp. All right, title, and interest in a 2022 Tesla Model S with VIN 5YJSA1E62NF462870;

qqqq. All right, title, and interest in a 2022 Tesla Model X with VIN 7SAXCBE55NF334011;

rrrr. All right, title, and interest in a 2022 Tesla Model X with VIN 7SAXCBE63NF332038;

ssss. All right, title, and interest in a 2022 Tesla Model Y with VIN 7SAYGDEF8NF393390;

tttt. All right, title, and interest in a 2022 Tesla Model Y with VIN 7SAYGDEF9NF346935;

uuuu. All right, title, and interest in a 2022 Volvo XC40 with VIN YV4ED3UB6N2684696;

vvvv. A Hublot-brand watch described as a “Classic Fusion Chronograph Bracelet King Gold Full Pavé” bearing serial number 1503922.

3. If any of the property described above, as a result of any act or omission of Defendant NEIL SURESH CHANDRAN or Defendant BRYAN LEE:

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

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

All pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

Money Laundering

1. The allegations contained in Counts Seven through Nine of this Superseding Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Sections 982(a)(1).

2. Pursuant to Title 18, United States Code, Section 982(a)(1), upon conviction of an offense in violation of Title 18, United States Code, Section 1957, Defendants NEIL SURESH CHANDRAN and BRYAN LEE shall forfeit to the United States of America any property, real or personal, involved in such offense, and any property traceable to such property. The property to be forfeited includes, but is not limited to:

- a. A forfeiture money judgment.
- b. All right, title, and interest in the real property and appurtenances commonly known as 404 North Royal Ascot Drive, Las Vegas, Nevada 89144;
- c. All right, title, and interest in the real property and appurtenances commonly known as 78 Innisbrook Avenue, Las Vegas, NV 89113;
- d. All right, title, and interest in the real property and appurtenances commonly known as 9000 West Third Street #104, Los Angeles, California 90048.

3. If any of the property described above, as a result of any act or omission of Defendant NEIL SURESH CHANDRAN or Defendant BRYAN LEE:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or

e. has been commingled with other property which cannot be divided
without difficulty,

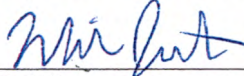
the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1) and Title 28, United States Code, Section 2461(c).

A TRUE BILL.

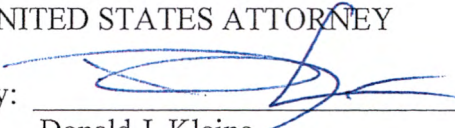
FOREPERSON

The United States of America requests that trial of this case be held in Lincoln, Nebraska, pursuant to the rules of this Court.

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