

**IN THE UNITED STATES DISTRICT COURT FOR THE  
NORTHERN DISTRICT OF FLORIDA  
PANAMA CITY DIVISION**

**UNITED STATES OF AMERICA**

**v.**

**RAVI BABU KOLLA  
a/k/a "Nick"**

**[REDACTED]**

**INDICTMENT**

*5:18 cr 32 / R H*

**THE GRAND JURY CHARGES:**

**COUNT ONE**

**A. INTRODUCTION**

At all times material to this Indictment:

1. The Immigration and Nationality Act provided that a noncitizen of the United States (hereinafter referred to as "alien" and "Foreign National" and "FN") could become a naturalized United States Citizen through marriage to a United States Citizen ("USC"). The process of gaining citizenship through marriage was, in part, as follows:

- a. An FN entered into a valid and legitimate marriage with a USC.
- b. The FN then completed, signed, and submitted to the United

States Citizenship and Immigration Services ("USCIS"), among other documents, a Form I-485, entitled "Application to Register Permanent Residence or Adjust Status" ("Form I-485").

Returned in open court pursuant to Rule 6(f)	
Date	<i>August 21, 2018</i>
	<i>[Signature]</i>
United States Magistrate Judge	

c. If a Form I-485 was prepared by someone other than the FN, the preparer was required to complete and sign Part 6 of Form I-485, declaring that the preparer prepared the Form I-485 at the FN's request and based upon all information known to the preparer.

d. The USC spouse was required to complete, sign, and submit to USCIS, among other documents, a Form I-130, entitled "Petition for Alien Relative" ("Form I-130").

e. If the Form I-130 was prepared by someone other than the USC spouse, the preparer was required to complete and sign Part F of Form I-130, declaring that the preparer prepared the Form I-130 at the USC spouse's request and based upon all the information known to the preparer.

f. The FN and USC spouse also were required to complete, sign, and submit to USCIS, a Form G-325A, entitled "Biographic Information (for Deferred Action)" ("Form G-325A"), which was included with the Form I-130 when submitted to USCIS.

g. Above the signature line of the Form G-325A, there was a notification, which clearly stated that there were severe penalties for knowingly and willfully falsifying or concealing a material fact.

h. In certain circumstances, a USC spouse could complete, sign, and submit to USCIS a Form I-864, entitled "Affidavit of Support Under Section

213A of the INA” (“Form I-864”). A Form I-864 was used by most family-based immigrants and some employment-based immigrants to show they had adequate means of financial support and were not likely to rely on the U.S. government for financial support. If the USC spouse filed Federal income tax returns, the USC spouse was required to submit a photocopy or transcript of the spouse’s Federal income tax return for the most recent tax year; and, in addition, could include Federal income tax returns for the second and third most recent tax years.

i. If the Form I-864 was prepared by someone other than the USC spouse, the preparer was required to sign Part 10 and anyone who helped complete the Form I-864 was required to sign it.

j. After these forms were submitted to USCIS, the couple was required to attend a USCIS interview to verify that the marriage was valid and legitimate and not the result of fraud. During the interview, the couple had the opportunity to submit additional documents to show the validity of the marriage.

k. If USCIS determined that the marriage was valid and legitimate and not the result of fraud, the FN was granted conditional legal status for a two-year period.

l. After two years, the FN could file with USCIS, among other documents, a Form I-751, entitled “Removal of Conditions.” After the Form I-751 was submitted, the couple was required to attend a second USCIS interview for

USCIS to again determine whether the marriage was valid and legitimate and not the result of fraud.

m. If USCIS determined that the marriage was still valid and legitimate and not the result of fraud, the FN was granted Lawful Permanent Resident (“LPR”) status and was given a Permanent Resident card, also known as a “green card.”

n. If the FN remained married for three years after being granted LPR status, the FN was eligible to seek citizenship through naturalization. If the FN divorced after being granted LPR status, the FN was eligible to seek citizenship through naturalization after five years with LPR status.

2. Defendant **RAVI BABU KOLLA** was a citizen of India, who entered the United States in or about November 2003, and resided in Panama City, Bay County, Florida, as an FN.

## **B. THE CHARGE**

Between on or about February 3, 2017, and on or about August 21, 2018, in the Northern District of Florida and elsewhere, the defendant,

**RAVI BABU KOLLA,**  
a/k/a “Nick,”

did knowingly and willfully conspire, combine, confederate, and agree with other persons to commit an offense against the United States, namely:

1. to knowingly enter into a marriage for the purpose of evading any provision of the immigration laws, in violation of Title 8, United States Code, Section 1325(c); and

2. to knowingly make under oath, and as permitted under penalty of perjury under Title 28, United States Code, Section 1746, and knowingly subscribe as true a false statement with respect to a material fact in an application, affidavit, and other document required by the immigration laws and regulations prescribed thereunder and knowingly present such application, affidavit, and other document which contained a false statement, and which failed to contain any reasonable basis in law or fact, in violation of Title 18, United States Code, Section 1546(a).

### C. MANNER AND MEANS

It was part of this conspiracy that:

1. Defendant **RAVI BABU KOLLA** operated an immigration marriage fraud enterprise in Bay County, Florida, that recruited female and male USC's to marry Indian FNs so that the Indian FNs could illegally gain immigration benefits.

2. Defendant **RAVI BABU KOLLA** recruited and caused to be recruited female and male USC's in the Panama City, Florida, area to marry Indian FNs.

3. Defendant **RAVI BABU KOLLA** arranged marriages between USC's and Indian FN's, which marriages took place in Coffee, Dale, and Houston County, Alabama.

4. Defendant **RAVI BABU KOLLA** employed female USC's, who themselves had married Indian FN's, to recruit other USC's to marry Indian FN's.

5. Defendant **RAVI BABU KOLLA** paid and agreed to pay USC brides and grooms \$12,000.00 to marry Indian FN's; \$500.00 on the wedding day, another \$500.00 upon submission of the I-130 and I-485 Forms, and \$500.00 per month thereafter for approximately two years.

6. Defendant **RAVI BABU KOLLA** paid for marriage licenses between on or about April 17, 2017, and on or about September 18, 2017.

7. Defendant **RAVI BABU KOLLA** prepared and caused to be prepared, and submitted and caused to be submitted, I-485 and I-130 Forms after the marriage ceremonies he arranged for Indian FN's.

8. Defendant **RAVI BABU KOLLA** caused Indian FN's throughout the United States to deposit a total of approximately \$255,000.00 into the defendant's Bank of America ("BoA") checking account ending in 6869 (Account 6869) between on or about February 3, 2017, and on or about January 19, 2018.

9. Defendant **RAVI BABU KOLLA** paid and caused to be paid USC brides and grooms at the beginning of every month.

#### **D. OVERT ACTS**

To effect the objects of the conspiracy, the defendant committed and caused to be committed the following overt acts, among others:

1. On or about August 21, 2017, **RAVI BABU KOLLA** caused \$2,500.00 from Indian FN groom K.M. to be deposited into Account 6869.
2. On or about August 23, 2017, **RAVI BABU KOLLA** caused \$2,100.00 from Indian FN groom K.M. to be deposited into Account 6869.
3. On or about August 30, 2017, **RAVI BABU KOLLA** transported USC bride S.M. and Indian FN groom K.M. to Coffee County, Alabama, where the defendant obtained and caused to be obtained a marriage license for USC bride S.M. and Indian FN groom K.M.
4. On or about August 30, 2017, **RAVI BABU KOLLA** arranged for USC bride S.M. and Indian FN groom K.M. to marry in Coffee County, Alabama.
5. On or about August 30, 2017, **RAVI BABU KOLLA** paid USC bride S.M. \$500.00 for marrying Indian FN groom K.M.
6. In or about September 2017, **RAVI BABU KOLLA** asked USC bride A.H. to marry Indian FN groom Y.V. for money.
7. Between in or about September 2017, and in or about October 2017, **RAVI BABU KOLLA** created and caused to be created an affidavit that falsely

stated USC bride S.M. and Indian FN groom K.M. had resided together at her residence in Bay County, Florida, since August 2017.

8. Between in or about September 2017, and in or about October 2017, **RAVI BABU KOLLA** gave a biographical questionnaire to USC bride S.M. for her to complete; and after receiving it back from USC bride S.M., the defendant created and caused to be created I-130 and I-485 Forms, which he hand-delivered to USC bride S.M. for her to sign, and paid her \$500.00.

9. On or about October 6, 2017, **RAVI BABU KOLLA** asked USC bride N.B. to enter into a marriage with Indian FN groom V.P.

10. On or about October 11, 2017, **RAVI BABU KOLLA** picked up USC bride N.B., paid her \$100.00, and drove her to Dothan, Alabama, where they met Indian FN groom V.P.

11. On or about October 11, 2017, **RAVI BABU KOLLA** obtained and caused to be obtained a marriage license for USC bride N.B. and Indian FN groom V.P. in Coffee County, Alabama.

12. On or about October 11, 2017, **RAVI BABU KOLLA** arranged for USC bride N.B. and Indian FN groom V.P. to be married in Coffee County, Alabama.

13. On or about October 11, 2017, **RAVI BABU KOLLA** paid USC bride N.B. \$400.00 for marrying Indian FN groom V.P.



14. On or about November 6, 2017, **RAVI BABU KOLLA** caused approximately \$900.00 from Indian FN groom V.P. to be deposited into Account 6869.

15. On or about November 8, 2017, **RAVI BABU KOLLA** caused \$99.00 from Indian FN groom V.P. to be deposited into Account 6869.

16. On or about November 17, 2017, **RAVI BABU KOLLA** caused \$330.00 from Indian FN groom V.P. to be deposited into Account 6869.

17. In or about November 2017, **RAVI BABU KOLLA** told USC bride J.N. that if she married an Indian FN groom he would pay her \$12,000.00; 500.00 on the wedding day, another \$500.00 upon submission of the I-130 Form, and \$500.00 per month thereafter for approximately two years during which she could not get divorced.

18. On or about November 6, 2017, **RAVI BABU KOLLA** introduced USC bride J.N. to Indian FN groom V.K. at a Super 8 Motel in Dothan, Alabama.

19. On or about November 6, 2017, **RAVI BABU KOLLA** traveled to the Coffee County courthouse in Alabama, where the defendant obtained and caused to be obtained a marriage license for USC bride J.N. and Indian FN groom V.K.

20. On or about November 6, 2017, **RAVI BABU KOLLA** arranged for USC bride J.N. and Indian FN groom V.K. to marry in Houston County, Alabama.

21. On or about November 7, 2017, **RAVI BABU KOLLA** caused \$3,500.00 from Indian FN groom V.K. to be deposited into Account 6869.

22. Between in or about December 2017, and in or about January 2018, **RAVI BABU KOLLA** created, caused to be created, and gave I-130, I-485, I-864, and G-325A Forms to USC bride N.B. for her to sign and paid her \$500.00.

23. On or about December 5, 2017, **RAVI BABU KOLLA** met USC bride A.H. in Coffee County, Alabama where the defendant obtained and caused to be obtained a marriage license for USC bride A.H. and Indian FN groom Y.V.

24. On or about December 5, 2017, **RAVI BABU KOLLA** arranged for USC bride A.H. and Indian FN groom V.P. to marry in Houston County, Alabama.

25. In or about December 2017, **RAVI BABU KOLLA** asked USC bride J.R. to marry Indian FN groom S.R. so Indian FN groom S.R. could stay in the United States for which the defendant would pay USC bride J.R. \$500.00 after the wedding ceremony and \$500 per month thereafter for approximately two years.

26. On or about December 14, 2017, **RAVI BABU KOLLA** caused \$2,500.00 from Indian FN groom S.R. to be deposited into Account 6869.

27. On or about December 14, 2017, **RAVI BABU KOLLA** transported USC bride J.R. and Indian FN groom S.R. to Coffee County, Alabama, where the defendant obtained and caused to be obtained a marriage license for USC bride J.R. and Indian FN groom S.R.

28. On or about December 14, 2017, **RAVI BABU KOLLA** arranged for USC bride J.R. and FN groom S.R. to marry in Houston County, Alabama.

29. On or about December 14, 2017, **RAVI BABU KOLLA** paid USC bride J.R. \$500.00 for marrying FN groom S.R.

30. On or about December 18, 2017, **RAVI BABU KOLLA** caused \$1,000.00 from Indian FN groom S.R. to be deposited into Account 6869.

31. Between in or about December 2017, and on or about April 15, 2018, **RAVI BABU KOLLA** created and caused to be created I-130, I-864, and G-325A Forms and gave them to the USC bride J.R. for her signature.

32. On or about February 2, 2018, **RAVI BABU KOLLA** caused \$500.00 from Indian FN bride A.P. to be deposited into Account 6869.

33. On or about February 5, 2018, **RAVI BABU KOLLA** caused \$554.00 from Indian FN groom S.R. to be deposited into Account 6869.

34. On or about February 8, 2018, **RAVI BABU KOLLA** caused \$1,500.00 from Indian FN groom Y.V. to be deposited into Account 6869.

35. On or about February 12, 2018, **RAVI BABU KOLLA** caused \$1,500.00 from Indian FN groom Y.V. to be deposited into Account 6869.

36. On or about March 12, 2018, **RAVI BABU KOLLA** caused \$900.00 from Indian FN groom Y.V. to be deposited into Account 6869.

37. In or about March 2018, **RAVI BABU KOLLA** asked USC groom R.M. to marry Indian FN bride A.P. for which the defendant would pay USC groom R.M. \$500.00 after the wedding ceremony and \$500.00 per month thereafter for approximately two years.

38. On or about March 19, 2018, **RAVI BABU KOLLA** transported USC groom R.M. and Indian FN bride A.P. to Coffee County, Alabama, where the defendant obtained and caused to be obtained a marriage license for USC groom R.M. and Indian FN bride A.P.

39. On or about March 19, 2018, **RAVI BABU KOLLA** arranged for USC groom R.M. and Indian FN bride A.P. to marry in Coffee County, Alabama.

40. On or about March 19, 2018, **RAVI BABU KOLLA** paid USC groom R.M. \$500.00 for marrying Indian FN bride A.P.

41. On or about March 21, 2018, **RAVI BABU KOLLA** caused \$2,000.00 from Indian FN bride A.P. to be deposited into Account 6869.

42. On or about April 5, 2018, **RAVI BABU KOLLA** caused \$1,000.00 from Indian FN groom Y.V. to be deposited into Account 6869.

43. On or about April 19, 2018, **RAVI BABU KOLLA** caused \$800.00 from Indian FN groom Y.V. to be deposited into Account 6869.

44. On or about May 3, 2018, **RAVI BABU KOLLA** caused \$1,000.00 from Indian FN groom Y.V. to be deposited into Account 6869.

45. On or about May 10, 2018, **RAVI BABU KOLLA** opened BoA checking account ending in 7637 (Account 7637) with an initial deposit of \$10,558.58.

46. On or about June 4, 2018, **RAVI BABU KOLLA** caused \$500.00 from Indian FN bride A.P. to be deposited into Account 7637.

47. On or about June 5, 2018, **RAVI BABU KOLLA** caused \$500.00 from Indian FN bride A.P. to be deposited into Account 7637.

48. On or about June 11, 2018, **RAVI BABU KOLLA** caused \$1,000.00 from Indian FN groom Y.V. to be deposited into Account 7637.

49. On or about June 11, 2018, **RAVI BABU KOLLA** created and caused to be created, and mailed and caused to be mailed to USCIS, an affidavit that contained the forged signature of USC bride J.N. that falsely stated USC bride J.N. and FN groom V.K. had resided together at her residence in Bay County, Florida, since October 1, 2017.

All in violation of Title 18, United States Code, Section 371.

## **COUNT TWO**

### **A. INTRODUCTION**

The allegations contained in Sections A, C, and D of Count One are incorporated by reference as if fully set forth herein.

**B. THE CHARGE**

Between on or about February 3, 2017, and on or about August 21, 2018, in the Northern District of Florida and elsewhere, the

**RAVI BABU KOLLA,  
a/k/a "Nick,"**

did knowingly conspire, combine, confederate, and agree with other persons to commit an offense against the United States, namely:

1. to knowingly conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce involving the proceeds of a specified unlawful activity, that is, fraud and misuse of visas, permits, and other documents, with the intent to promote the carrying on of that specified unlawful activity and knowing that the funds involved in the financial transaction represented the proceeds of some form of unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(A)(i); and
2. to knowingly conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce involving the proceeds of a specified unlawful activity, that is, fraud and misuse of visas, permits, and other documents, knowing that the transaction was designed to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of the specified unlawful activity, and knowing that the funds involved in the financial transaction

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 Title 18, United States Code, Section 1956(h).

**VISA FRAUD FORFEITURE**

The allegations contained in Count One of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 982(a)(6). From the defendant's engagement in a conspiracy to violate Title 18, United States Code, Section 1546, as alleged in Count One of this Indictment, the defendant,

**RAVI BABU KOLLA,  
a/k/a "Nick,"**

shall forfeit to the United States of America any conveyance, including any vessel, vehicle, or aircraft used in the commission of the offense; and any property, real or personal, that constitutes, or is derived from or is traceable to the proceeds obtained directly or indirectly from the commission of the offense; and that was used to facilitate, or was intended to be used to facilitate, the commission of the offense.

If any of the property described above as being subject to forfeiture, as a result of any act or omission of the defendant:

- i. cannot be located upon the exercise of due diligence;
- ii. has been transferred or sold to, or deposited with, a third person;
- iii. has been placed beyond the jurisdiction of this Court;
- iv. has been substantially diminished in value; or
- v. has been commingled with other property that cannot be divided without difficulty,

it is the intent of the United States, 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), to seek forfeiture of any other property of said defendant up to the value of the forfeitable property.

#### **MONEY LAUNDERING FORFEITURE**

The allegations contained in Count Two of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 982(a)(1). From the defendant's engagement in the violation alleged in Count Two of this Indictment, the defendant,

**RAVI BABU KOLLA,**  
a/k/a "Nick,"



shall forfeit to the United States of America any and all of the defendant's right, title, and interest in any property, real and personal, involved in such offense, and any property traceable to such property.

If any of the property described above as being subject to forfeiture, as a result of any act or omission of the defendant:

- i. cannot be located upon the exercise of due diligence;
- ii. has been transferred or sold to, or deposited with, a third person;
- iii. has been placed beyond the jurisdiction of this Court;
- iv. has been substantially diminished in value; or
- v. has been commingled with other property that cannot be divided without difficulty,

it is the intent of the United States, 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), to seek forfeiture of any other property of said defendant up to the value of the forfeitable property.

A TRUE BILL:

REDACTED

FOREPERSON *U*

*Aug 21, 2018*  
DATE

  
CHRISTOPHER P. CANOVA  
United States Attorney

  
COREY J. SMITH  
Assistant United States Attorney