

ATTACHMENT A

Count One
(Wire Fraud Conspiracy)

From at least as early as on or about January 30, 2017 through at least on or about July 5, 2023, in Hudson County in the District of New Jersey, and elsewhere, the defendant,

MANOJ YADAV,

knowingly and intentionally conspired and agreed with others to devise a scheme and artifice to defraud, and to obtain money and property from victims by means of false and fraudulent pretenses, representations, and promises, and, for the purpose of executing such scheme and artifice to defraud, to transmit and cause to be transmitted by means of wire communications in interstate and foreign commerce certain writings, signs, signals, pictures, and sounds, contrary to Title 18, United States Code, Section 1343.

In violation of Title 18, United States Code, Section 1349.

ATTACHMENT B

I, Jared Burgan, am a Special Agent of the Federal Bureau of Investigation. The information contained in the complaint is based upon my personal knowledge, as well as information obtained from other sources, including: (a) statements made or reported by various witnesses with knowledge of relevant facts; (b) my review of publicly available information; and (c) my review of evidence. Because this complaint is being submitted for a limited purpose, I have not set forth each and every fact that I know concerning this investigation. Where the contents of documents and the actions and statements of others are reported herein, they are reported in substance and in part, except where otherwise indicated. Where I assert that an event took place on a particular date or time, I am asserting that it took place on or about the date or time alleged.

1. At all times relevant to this Complaint:
 - a. Manoj Yadav (“Manoj”) was a resident of Jersey City, New Jersey and Clifton, New Jersey.
 - b. Manoj owned Phebs Services, LLC (“Phebs Services”), a limited liability company registered in Jersey City, New Jersey. Phebs Services did business as both “Phebs Software Services” and “Quickbooks Accounting.” In approximately January 2022, Manoj also registered an entity called “PN Bookkeeping Services, LLC, Quickbooks Accounting.”
 - c. Manoj and his coconspirators also did business under the names “Phebbs Consulting,” “Quickbooks Tech Assist,” “Quickbook US,” and “Quickbooks Support Team.”
 - d. During the course of the conspiracy, Manoj used the email account “info@phebsservices.com” in furtherance of the fraud scheme. In or around November 2017, Manoj purchased the domain “quickbooksaccounting.co,” with an associated email address “info@quickbooksaccounting.co,” both of which Manoj used in furtherance of the scheme.
 - e. Manoj’s coconspirators also used the email accounts “info@quickbookstechassist.com” and “impa.infotech@gmail.com” in furtherance of the fraud scheme.
 - f. “Software Company” was an American business software company that specialized in financial software.
 - g. Software Company marketed a popular accounting software package (the “Accounting Software”) that offered accounting applications as

well as cloud-based versions that accepted business payments and offered bill pay and payroll functions.

2. The FBI has been investigating Manoj and others (the “Fraud Ring”) for perpetrating a technical support scam under the name “Quickbooks Accounting” (the “Tech Support Scheme”). The investigation to date has revealed that Manoj and other coconspirators falsely misled numerous victims into thinking that “Quickbooks Accounting” was a technology support company affiliated with Software Company to assist with technical support issues involving the Accounting Software. “Quickbooks Accounting” is not affiliated with Software Company and is not authorized to conduct business on behalf of Software Company involving the Accounting Software. Instead, the Tech Support Scheme involved charging victims exorbitant fees for purported support services that are not performed by or on behalf of Software Company.

3. Numerous victims have filed complaints about Quickbooks Accounting. For example:

- a. According to Software Company records, in or around May 2017, a legitimate customer of Software Company, Victim-1, paid approximately \$1,999.95 to Phebs Services after Victim-1 was led by a member of the Fraud Ring to believe that Phebs Services was authorized by Software Company to assist with issues involving the Accounting Software. Victim-1 received an email from a member of the Fraud Ring offering Victim-1 a “Gold Package” associated with tech support services. The signature block of the email claimed the individual was working on behalf of “[Accounting Software] Support Team.” Phebs Services was not a part of Software Company’s customer support team.
- b. In or around November 2017, Victim-2 received a phone call from an individual who said his name was “Kevin Parker,” purportedly calling from a large technology company. “Kevin Parker” eventually took approximately \$9,010 from Victim-2, who was elderly, purportedly for Accounting Software, which was not software that Victim-2 even used. The money was sent to several entities, including Phebs Services.

4. As part of the Tech Support Scheme, Manoj and his wife, “Individual-1,” obtained merchant accounts (the “Subject Merchant Accounts”) in the United States so the Fraud Ring could charge victims for services purportedly being provided on behalf of Software Company. For example, on or about January 30, 2017, Individual-1 emailed to a merchant payment processing company an application for a merchant account. Attached to the application, Individual-1 included her driver’s license and a copy of a

check from a checking account in the name of “[Individual-1], d/b/a Phebs Software Services.” On or about July 16, 2020, Individual-1, using the email account info@phebsservices.com, applied for a merchant account for Phebs Services d/b/a Quickbooks Accounting. In the application, Individual-1 and Manoj were listed as the owners of the business.

5. Because Quickbooks Accounting was a technical support scam, the Subject Merchant Accounts often experienced chargebacks as a result of victims complaining that they had not authorized the exorbitant rates and/or did not receive services in response to paying the high fees.

6. In or around April 2017, Manoj, using the email account info@phebsservices.com, exchanged emails with another individual working for a supposed technical support company located in India about the high number of chargebacks on one of Manoj’s merchant accounts. Manoj complained that the India-based technical support contact’s team was not filling out customer authorization forms. In response, the India-based technical support contact stated, in part:

I understand your concern about the high CB [presumably, chargebacks] but this is a high risk business and "March" is a crucial month when such things happen at peak. Being in this business for so long whenever the CB percentage rises on any of our gateways we reduce it by strategically charging high percentage of our old customers on that gateway thereby reducing the risk of CB further. That is what we have done for TYSY gateway. If you analyse for April out of total of \$5764 charged on this gateway only \$750 are new sales. Rest all are our old customers.

In other words, Manoj’s coconspirator’s suggestion in response to the high volume of chargebacks was to charge existing victims who were less likely to contest the charges. This would be done so the merchant vendors would not become suspicious of the high charge back rates and close the merchant account.

7. Further, as part of the Tech Support Scheme, members of the Fraud Ring told victims that they were a part of Software Company when in fact they were not. Specifically, members of the Fraud Ring sent emails that appeared to come from Software Company, including by using Software Company’s logos. The emails often told potential victims that their subscriptions for the Accounting Software were soon set to expire and provided contact information to renew the victim’s Accounting Software subscriptions. In reality, the provided contact information was contact information for Quickbooks Accounting, not Software Company, and victims who contacted

Quickbooks Accounting did not receive services affiliated with Software Company.

8. For example, in or around February 2017, info@phebsservices.com sent an email to a list of undisclosed recipients that stated: “This mail is to inform you about [Accounting Software] Charges. The [Accounting Software] Services Charges will reflect in your Credit Card statements by the name of Phebs Services/Phebs Software Services.” In other words, the email misleadingly suggested that charges from Manoj’s company were charges from Software Company.

9. In or around March 2017, info@phebsservices.com received an email from coconspirator account info@quickbookstechassist.com that purported to be a payment receipt for Accounting Software “premium services.” The end of the email listed Phebs Services as being a Software Company “Pro Advisor.” “Pro Advisor” was a designation recognized by Software Company for certain individuals who passed a certification test involving Software Company’s Accounting Software. Individuals who received the “Pro Advisor” designation were permitted to act as independent contractors for Software Company by advising Software Company’s clients on the uses of the Accounting Software. The “Pro Advisor” designation benefited these individuals by exposing them to additional clientele through Software Company. Obtaining the “Pro Advisor” designation did not authorize these individuals to hold themselves out as Software Company or employees of Software Company. Manoj used the “Pro Advisor” designation to attempt to promote the legitimacy of the Tech Support Scheme.

10. On or about June 21, 2018, Software Company sent to Manoj at info@phebsservices.com an email with the subject line “Notice of Termination from the [Accounting Software] ProAdvisor Program.” The email informed Manoj that Software Company was terminating Manoj’s membership in the Accounting Software ProAdvisor Program, his ProAdvisor ID number, and all associated Software Company accounts and user IDs, effective immediately. The email explained that “[a]fter a detailed review of recent customer escalations and reports of misconduct,” Manoj was determined to have violated the terms of the program agreements with Software Company. The email continued that all licenses granted to Manoj were terminated, that Manoj was to “immediately cease using” all materials provided to Manoj through the ProAdvisor program, including images, logos, and any content belonging to Software Company. The email further stated that Manoj was not authorized to identify or represent that he was a member of the ProAdvisor program, including on websites, in advertisements, or by phone to potential customers. The email indicated that this decision was “final and there will be no re-consideration.” On or about July 30, 2018, Manoj acknowledged receipt of the

termination in an email sent to Software Company from the email address “manojyads@gmail.com.”

11. Manoj nonetheless continued to represent himself as a “Pro Advisor” for years after receiving the notice of termination in furtherance of the Tech Support Scheme. For example, on or about January 4, 2022, Manoj, using the email address info@quickbooksaccounting.co, sent an email to rain@newjersey.bbb.org titled “BBB Complaint : 16384692” in which Manoj wrote “I would like to explain this we are [Accounting Software] ProAdvisor, We do not have any of details of this customer in our record.”

12. Manoj also continued to exploit the name and materials of Software Company to further engage in the Tech Support Scheme well after receiving the notice of termination email from Software Company.

13. For example, in or around December 2018, Victim-3 forwarded to info@phebsservices.com an email that Victim-3 received from info@quickbookstechassist.com. Victim-3 also attached a letter to the email. The display name of the email from info@quickbookstechassist.com was “[Accounting Software] Services.” The email subject stated: “FINAL REMINDER FOR [Accounting Software] RENEWAL” and alerted the “customer” that “your [Accounting Software] service with us has expired. To ensure uninterrupted [Accounting Software] service. Please call us back at” and included a toll-free number.

14. The letter from Victim-3 outlined that Victim-3 believed that it was paying for Accounting Software provided by Software Company and asked for clarification on several charges Victim-3 paid for the same services. The letter outlined further that Victim-3 had previously paid approximately \$999.99 in or around November 2016, approximately \$849.61 in or around March 2017, approximately \$399.95 in February 2018, and approximately \$399.90 in August 2018. A screenshot provided from Victim-3 reflected that the merchant account that charged Victim-3 for these services bore the name of Software Company and the Accounting Software.

15. In or around August 2019, info@phebsservices.com received a payment receipt issued from “[Accounting Software] Services” that included Software Company’s logos and appeared to come from Software Company for Accounting Software. The payment receipt was in the approximate amount of \$1,390.95 for Software Company’s Accounting Software “premium support” for

5 years. The bottom of the email included the logos for Software Company, the Accounting Software, and other of Software Company's products.

16. In or around October 2019, a company that provided phone lines emailed an invoice to "info@phebsservices.com." The listed billing information on the invoice was to Manoj on behalf of Impa Infotech Private Limited.

17. In or around January 2020, info@phebsservices.com received an email from info@quickbookstechassist.com. The display name of the email was from "[Accounting Software] Services" and the email contained Software Company's logos that it used to market Accounting Software. The email was addressed to Software Company's "customers" and alerted said "customers" that there were two new telephone numbers that should be used for customer service and technical support. The end of the email was signed by "[Software Company] Team." This was materially false and misleading because Quickbooks Accounting and Phebs Services were not authorized by or a part of Software Company.

18. According to information provided by Victim-4, Victim-4 previously purchased a legitimate license for Accounting Software from Software Company. In or around February 2021, Victim-4's Accounting Software appeared to shut down, and a message appeared on Victim-4's computer stating, in sum and substance, that his data was failing. Victim-4 called a number that he thought was the customer support services line for Software Company and left a message. Victim-4 received a call back from someone who he understood worked for Software Company. The individual told Victim-4 that Victim-4 needed to purchase the "next level" of support services to have customer assistance. Victim-4 was told that this next level of services would cost approximately \$3,200 for five years.

19. Shortly after the call, Victim-4's credit card was charged by a Quickbooks Accounting merchant account in the approximate amount of \$3,247, which was listed as "Quickbooks Accounting." After speaking with Software Company in or around April 2021, Victim-4 realized that he had been charged by an entity that was not affiliated with Software Company.

20. Victim-4 thereafter disputed the charge with his credit card company. The merchant payment processing company then emailed Manoj to inquire about the disputed payment. In response, Manoj sent an authorization form purportedly authorizing the charges. Victim-4 was shown a copy of this authorization form, which purportedly bore his signature. Victim-4 confirmed that he did not submit the form, did not authorize anyone to sign the form on

his behalf, and did not sign the authorization form that Manoj presented to the bank in connection with the authorization dispute.

21. Throughout the course of the scheme, the coconspirators continued to hold themselves out as being affiliated with Software Company to provide services for Accounting Software. For example, on or about August 2021, impa.infotech@gmail.com issued a payment receipt to a company in the approximate amount of \$5,991.95, which purportedly was for a 5-year data service plan for Software Company and Accounting Software. The top and bottom of the payment receipt bore the name and unique logos of both Software Company and Accounting Software.

22. In or around November 2021, Victim-5 reported that she had received a call from someone who told Victim-5 that they noticed errors in her Accounting Software account. The individual told Victim-5 that they needed to obtain remote access to the victim's computer to fix the problems. Victim-5 provided access to their computer and was charged approximately \$3,500.00, purportedly for a 5-year subscription for the Accounting Software. Victim-5 stated that she accused the company's customer service representative of not actually being from Software Company. The individual, in response, stated that they were calling from Software Company. Victim-5 provided a link to an authorization form provided to her by the company, which was to quickbooksaccounting.co, the domain registered by Manoj.

23. According to information provided by Victim-6, Victim-6 was a customer of Accounting Software who began having difficulties with the software in or around 2021. Victim-6 contacted someone who Victim-6 believed to be Software Company but ended up being a representative of Quickbooks Accounting, who represented to Victim-6 that Quickbooks Accounting was affiliated with Software Company. Further, the website that Victim-6 saw for Quickbooks Accounting and the emails he received from Quickbooks Accounting bore the logos and names of Software Company and Accounting Software.

24. The representative who spoke with Victim-6 told Victim-6 that his version of Accounting Software needed to be upgraded so that Quickbooks Accounting could render customer service to Victim-6. Victim-6 agreed to let a representative of Quickbooks Accounting remotely access his computer for the purpose of upgrading his Accounting Software. Victim-6 agreed to pay for what he thought was five years of technical support for Accounting Software, in addition to the services Quickbooks Accounting claimed to have performed when the representative remotely accessed his computer. In total, Victim-6 was charged approximately \$4,999 in three separate charges: approximately \$2,000, \$1,999, and \$1,000. Victim-6 eventually became suspicious that Quickbooks Accounting was not legitimately affiliated with Software Company. Victim-6 called Software Company to verify the services he paid for, and

Software Company told Victim-6 they had no records of him paying Software Company the approximate \$4,999.00 Victim-6 was charged earlier in 2021.

25. In or around January 2022, info@quickbooksaccounting.co received an email forwarded by Victim-7. The email reflected that Victim-7 complained about Quickbooks Accounting in New Jersey and to a state regulator. Thereafter, a representative from Quickbooks Accounting told Victim-7 that they would reimburse Victim-7 if she could convince the state regulator to drop its investigation.

26. On or about March 8, 2022, Manoj was informed by one of his payment processors that a purported customer authorization form that Manoj supplied to the payment processor in support of a contested charge had been identified by the actual customer as fraudulent and the customer made clear that he had not signed the purported authorization form for the charges.

27. Throughout the conspiracy, the coconspirators exchanged emails listing the payout distribution for the money obtained as a result of the Tech Support Scheme. For example, on or about February 8, 2022, info@quickbooksaccounting.co sent an email to impa.infotech@gmail.com titled "Fwd: Payout 7-Feb-22." The email listed a gross amount of \$92,876.21, then listed the amount after deductions as \$85,276.31. After subtracting some additional fees, including \$14,496.97 to Phebs Services, which was approximately 17% of the amount after deductions, the email listed a final payout of \$70,160.12.

28. These emails often included a spreadsheet that contained victim information, including the victim's name, address, the date of payment, and the amount charged to the victim. A copy of the spreadsheet that was emailed between Manoj and a coconspirator in or around April 2022 reflected a total listed amount of over approximately \$13.1 million charged to victims from in or around August 2017 through in or around April 2022.

29. Records obtained from PayZang, a credit card processing company relied on by Manoj and Phebs Services, showed that Phebs Services was receiving funds from victim customers as late as on or about July 5, 2023.