

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA : **CRIMINAL NO.** _____
v. : **DATE FILED:** _____
JAITASS DHANOA, : **VIOLATIONS:**
a/k/a “Jay D. Singh,” : **18 U.S.C. § 1014 (false credit application**
a/k/a “Jay Singh” : **- 8 counts)**
: **18 U.S.C. § 1029 (unauthorized use of**
: **access device - 3 counts)**
: **18 U.S.C. § 1028A (aggravated identity**
: **theft - 3 counts)**
: **18 U.S.C. § 911 (false representation of**
: **United States citizenship - 1 count)**
Notice of Forfeiture

INDICTMENT

COUNTS ONE THROUGH EIGHT

THE GRAND JURY CHARGES THAT:

1. At all times relevant to this indictment, the following financial institutions were insured by the Federal Deposit Insurance Corporation (“FDIC”):
 - a. Bank of America (FDIC Certification Number 6466);
 - b. GE Money Bank (FDIC Certification Number 27314);
 - c. Chase Bank (FDIC Certification Number 23702); and
 - d. HSBC Bank (FDIC Certification Number 57890).
2. Defendant JAITASS DHANOA joined the social networking sites www.indiandating.com and www.match.com through which he met young women, claiming that he was an American and British citizen working in Philadelphia for either the International

Monetary Fund or Deutsche Bank. Defendant DHANOA created a completely false personal biography to seduce his victims and earn their trust, and using the names Jaitass Dhanoa, Jay Singh, Jay D. Singh, and Jay Dudley Singh.

4. Upon gaining his victims' trust, defendant JAITASS DHANOA abused this trust in multiple ways to steal tens of thousands of dollars.

a. Defendant DHANOA stole the personal identification information of victims N.V., A.A., and M.P., and used it to apply for and open credit cards in each victim's name without their knowledge or consent.

b. Defendant DHANOA gained access to victim N.V. and M.P.'s credit cards and used, and attempted to use, those credit cards without their knowledge to make thousands of dollars in unauthorized charges.

c. Defendant DHANOA fraudulently induced M.P. to consent to open a joint credit card listing M.P. as the primary holder and responsible party.

5. In furtherance of the scheme to steal these victims identities to obtain unauthorized credit cards, defendant JAITASS DHANOA opened up post office boxes in the victims' names and created fake email addresses in the victims' names. These pretenses were used to defraud the financial institutions issuing these credit cards.

6. On or about the dates listed below, each instance constituting a separate count, in the Eastern District of Pennsylvania, and elsewhere, defendant

**JAITASS DHANOA,
a/k/a "Jay D. Singh,"
a/k/a "Jay Singh,"**

knowingly made and caused to be made to the bank listed below, a false statement for the

purpose of influencing the actions of that bank, in that defendant JAITASS DHANOA caused to be submitted to that bank a false credit card application in which the defendant represented that he was one of his victims, when, as the defendant knew, he had no authorization to use his victim's identity to obtain credit from the banks listed below.

COUNT	DATE	DESCRIPTION
One	December 12, 2009	False credit card application, using N.V.'s identification, for a Bank of America credit card ending in 5700.
Two	December 12, 2009	False credit card application, using N.V.'s identification, for a GE Money Bank credit card ending in 1725.
Three	November 9, 2009	False credit card application, using A.A.'s identification, for a Chase Bank credit card.
Four	November 3, 2009	False credit card application, using, A.A.'s identification, for a Bank of America credit card ending in 6180.
Five	December 22, 2009	False credit card application, using, M.P.'s identification, for a Bank of America credit card ending in 6210.
Six	December 9, 2009	False credit card application, using, M.P.'s identification, for an HSBC credit card ending in 5550.
Seven	November 19, 2009	False credit card application, using, M.P.'s identification, for an HSBC credit card ending in 2087.
Eight	December 22, 2009	False credit card application, using, M.P.'s identification, for a GE Money Bank credit card ending in 2772.

All in violation of Title 18, United States Code, Section 1014.

COUNTS NINE THROUGH ELEVEN

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 through 5 of Counts One through Eight are incorporated here.
2. On or about the dates listed below, each date constituting a separate count, in the Eastern District of Pennsylvania, and elsewhere, defendant

**JAITASS DHANOA,
a/k/a “Jay D. Singh,”
a/k/a “Jay Singh”**

knowingly and with the intent to defraud used an unauthorized access device, that is, the account numbers specified below, to obtain things of value aggregating \$1,000 or more during a one-year period, thereby affecting interstate and foreign commerce:

COUNT	DATE	DESCRIPTION
Nine	September 20, 2009	Chase Bank credit account ending in 9806, in the name of M.P., to obtain things of value aggregating \$1,000 or more during a one-year period, for a total of approximately \$1,864.
Ten	September 29, 2009	Bank of America credit account ending in 9747, in the name of M.P., to obtain things of value aggregating \$1,000 or more during a one-year period, for a total of approximately \$1,883.
Eleven	October 20, 2009	American Express credit account ending in 1048, in the name of M.P., to obtain things of value aggregating \$1,000 or more during a one-year period, for a total of approximately \$2,850.

All in violation of Title 18, United States Code, Section 1029(a)(2).

COUNT TWELVE

THE GRAND JURY FURTHER CHARGES THAT:

From in or about October 2009 through in or about January 2010, in the Eastern District of Pennsylvania, and elsewhere, defendant

**JAITASS DHANOA,
a/k/a “Jay D. Singh,”
a/k/a “Jay Singh”**

knowingly and without lawful authority possessed and used a means of identification of another person, that is, the name, social security number, and date of birth, of A.A., during and in relation to a credit fraud scheme.

In violation of Title 18, United States Code, Sections 1028A(a)(1) and (c)(4).

COUNT THIRTEEN

THE GRAND JURY FURTHER CHARGES THAT:

From in or about October 2009 through in or about January 2010, in the Eastern District of Pennsylvania, and elsewhere, defendant

**JAITASS DHANOA,
a/k/a “Jay D. Singh,”
a/k/a “Jay Singh”**

knowingly and without lawful authority possessed and used a means of identification of another person, that is, the name, social security number, and date of birth, of M.P., during and in relation to a credit fraud scheme.

In violation of Title 18, United States Code, Sections 1028A(a)(1) and (c)(4).

COUNT FOURTEEN

THE GRAND JURY FURTHER CHARGES THAT:

From in or about December 2009 through in or about January 2010, in the Eastern District of Pennsylvania, and elsewhere, defendant

**JAITASS DHANOA,
a/k/a “Jay D. Singh,”
a/k/a “Jay Singh”**

knowingly and without lawful authority possessed and used a means of identification of another person, that is, the name, social security number, and date of birth, of N.V., during and in relation to a credit fraud scheme.

In violation of Title 18, United States Code, Sections 1028A(a)(1) and (c)(4) .

COUNT FIFTEEN

THE GRAND JURY FURTHER CHARGES THAT:

From in or about November 2007 through in or about March 2010, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendant

**JAITASS DHANOA,
a/k/a “Jay D. Singh,”
a/k/a “Jay Singh,”**

an alien and a native and citizen of India, falsely and willfully represented himself to be a citizen of the United States.

In violation of Title 18, United States Code, Section 911.

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

1. As a result of the violations of Title 18, United States Code, Sections 1029(a)(2) and 1014, set forth in this indictment, defendant

**JAITASS DHANOA,
a/k/a “Jay D. Singh”
a/k/a “Jay Singh”**

shall forfeit to the United States of America any property that constitutes or is derived from gross proceeds traceable to the commission of such offenses, including, but not limited to, the sum of \$22,916.

2. If any of the property subject to forfeiture, as a result of any act or omission of the defendant:

- (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;

it is the intent of the United States, pursuant to Title 18, United States Code, Section 982(b) and Title 28, United States Code, Section 2461(c), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property subject to forfeiture.

All pursuant to Title 18, United States Code, Section 982(a)(2)(A).

A TRUE BILL:

GRAND JURY FOREPERSON

MICHAEL L. LEVY
UNITED STATES ATTORNEY