

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

- - - - -	X	
	:	
UNITED STATES OF AMERICA	:	<b><u>INFORMATION</u></b>
	:	
- v. -	:	19 Cr. 90
	:	
MANISH KALRA,	:	
	:	
Defendant.	:	
	:	
- - - - -	X	

**COUNT ONE**

**(Conspiracy to Commit Money Laundering)**

The United States Attorney charges:

1. From at least in or about September 2018 up to and including at least in or about November 2018, in the Southern District of New York and elsewhere, MANISH KALRA, the defendant, and others known and unknown, intentionally and knowingly did combine, conspire, confederate, and agree together and with each other to violate Title 18, United States Code, Section 1957.

2. It was a part and an object of the conspiracy that, in the Southern District of New York and elsewhere, MANISH KALRA, the defendant, and others known and unknown, in an offense involving and affecting interstate and foreign commerce, would and did knowingly engage and attempt to engage in monetary transactions, to wit, wire transfers and negotiation of cashier's checks, in criminally derived property of a value greater than \$10,000 that was derived from specified unlawful

activity, to wit, wire fraud, in violation of Title 18, United States Code, Section 1957.

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

**FORFEITURE ALLEGATION**

3. As a result of committing the offense alleged in Count One of this Information, MANISH KALRA, the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(1), any and all property, real and personal, involved in said offense, or any property traceable to such property, including but not limited to a sum of money in United States currency representing the amount of property involved in said offense.

**Substitute Asset Provision**

4. If any of the above-described forfeitable property, 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 person;

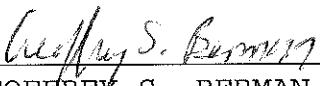
c. has been placed beyond the jurisdiction of the Court;

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 21, United States Code, Section 853(p) and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Section 982; Title 21, United States Code, Section 853; and Title 28, United States Code, Section 2461.)

  
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GEOFFREY S. BERMAN  
United States Attorney

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(18 U.S.C. § 1956(h).)

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GEOFFREY S. BERMAN  
United States Attorney

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