

DEC 10 2019

By: JAMES N. HATTEN, Clerk  
*clm* Deputy Clerk

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

ORIGINAL

UNITED STATES OF AMERICA

*v.*

SHIVANG BHARATKUMAR THAKUR

CRIMINAL INDICTMENT No.

**1:19CR511**

THE GRAND JURY CHARGES THAT:

Background

At all times relevant to this Indictment:

1. As used in this Indictment, a “call center” was an organization or group of organizations that defrauded U.S. residents, including elderly Americans, by misleading victims over the telephone into sending money utilizing scams, including a loan scam. As part of the loan scam, call centers deceived U.S. residents into believing that they were eligible for fictitious loans. Callers directed the U.S. residents to pay upfront taxes and fees to prove ability to repay the loan and to verify their bank accounts. The victims received nothing in return.
2. Based on misrepresentations made during the calls, the victims, including residents of the Northern District of Georgia, sent money via money transmitters such as Western Union, MoneyGram, and Ria Financial.
3. The defendant, SHIVANG BHARATKUMAR THAKUR, is an Indian national who arrived to the U.S. in or about August 2017.
4. From on or about August 12, 2017, to on or about January 10, 2018, the defendant, SHIVANG BHARATKUMAR THAKUR, retrieved over \$331,000 in

cash payments of scammed funds from money transmitters using fake identification documents and fraudulent information. Approximately 288 victims sent the funds in response to the fraud. The defendant, SHIVANG BHARATKUMAR THAKUR, used approximately 71 fake identification cards with numerous aliases to retrieve the scammed funds.

**COUNT ONE**

*(Conspiracy to Commit Money Laundering - 18 U.S.C. § 1956)*

5. The Grand Jury realleges and incorporates herein by reference paragraphs 1 through 3 of Indictment as though fully set forth herein.

6. From on or about August 12, 2017, to on or about January 10, 2018, in the Northern District of Georgia and elsewhere, the defendant, SHIVANG BHARATKUMAR THAKUR, and others known and unknown to the Grand Jury, did knowingly combine, conspire, agree, and have a tacit understanding with each other and others, both known and unknown to the Grand Jury, to conduct and attempt to conduct financial transactions affecting interstate commerce, which involved the proceeds of a specified unlawful activity, that is, wire fraud, in violation of Title 18, United States Code, Section 1343, knowing that the financial transactions were designed in whole and in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, and while conducting and attempting to conduct such financial transactions, the defendants knew that the property involved in the financial transactions 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).

**COUNTS TWO THROUGH SEVEN***(Money Laundering - 18 U.S.C. § 1956(a)(1)(B)(i))*

1. On or about each of the dates set forth below in Column B, the defendant, SHIVANG BHARATKUMAR THAKUR, aided and abetted by others known and unknown to the Grand Jury, did knowingly conduct and attempt to conduct a financial transaction affecting interstate commerce, that is, he used fake identification documents and fraudulent information to retrieve the interstate wire transfer described below in Column C and Column D for each count and associated with the victims identified in Column E. Each transaction involved the proceeds of a specified unlawful activity, that is, wire fraud, in violation of Title 18, United States Code, Section 1343, knowing that such transaction was designed in whole and in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, and while conducting and attempting to conduct such financial transactions, knew that the property involved in the financial transaction represented the proceeds of some form of unlawful activity.

A	B	C	D	E
COUNT	DATE	DESCRIPTION	AMOUNT	VICTIM
2	11/1/17	Electronic money transfer from Dalton, GA to Thomaston, GA via Ria	\$1,934	M.C.
3	11/1/17	Electronic money transfer from Dalton, GA to Thomaston, GA via MoneyGram	\$990	M.C.
4	11/2/17	Electronic money transfer from Snellville, GA to Phenix City, AL via Ria	\$2,450	P.B.

A	B	C	D	E
COUNT	DATE	DESCRIPTION	AMOUNT	VICTIM
5	11/22/17	Electronic money transfer from Kennesaw, GA to New Hope, MN via Western Union	\$637.82	B.A.
6	12/13/17	Electronic money transfer from Lilburn, GA to Eagan, MN via MoneyGram	\$754	R.M.
7	12/15/17	Electronic money transfer from Conyers, GA to Blaine, MN via MoneyGram	\$710	R.C.

All in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i) and Section 2.

#### FORFEITURE PROVISION

1. The allegations contained in Counts One through Seven of this Indictment are hereby re-alleged and incorporated by reference as if fully set forth herein for the purpose of alleging forfeiture.

2. Upon conviction of one or more offenses alleged in Counts One through Seven of this Indictment, the defendant, SHIVANG BHARATKUMAR THAKUR, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(1), any property, real and personal, involved in such offense, or any property traceable to such property, including, but not limited, to the following:

- a. MONEY JUDGMENT: A sum of money in United States currency, representing the amount of proceeds obtained as a result of the offenses alleged in Counts One through Seven of this Indictment.

3. If, as a result of any act or omission of a defendant, any property described above:
- 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 subdivided without difficulty;

the United States intends, pursuant to Title 18, United States Code, Section 982(b)(1) and Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property.

A           *me*           BILL

          *Mary Gurn*            
FOREPERSON

BYUNG J. PAK  
*United States Attorney*

*Jolee Porter*  
JOLEE PORTER

*Assistant United States Attorney*  
Georgia Bar No. 462455

600 U.S. Courthouse • 75 Ted Turner Drive, SW  
Atlanta, GA 30303 • 404-581-6000