

UNITED STATES OF AMERICA,

Plaintiff,

v.

MANISH PATEL and  
NIKITA SHUKLA,

Defendants.

STEPHEN C. DRIES  
CLERK

Case No. **17-CR-94**  
[18 U.S.C. §§ 2, & 1343]

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**INDICTMENT**

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**THE GRAND JURY CHARGES:**

**INTRODUCTION**  
**(The Scheme to Defraud)**

1. Beginning on or about September 28, 2016 and continuing until at least May 10, 2017, in the State and Eastern District of Wisconsin and elsewhere,

**MANISH PATEL and  
NIKITA SHUKLA**

and others, known and unknown to the grand jury, with the intent to defraud, knowingly participated in a scheme to defraud and to obtain money by means of materially false and fraudulent pretenses and representations (the “scheme”), which is further described below.

2. The essence of the scheme was that unknown members of the scheme called victims and made misrepresentations to them, which caused each victim to send a MoneyGram—which is an electronic transfer of money—for a certain amount of money to a specific location and to a specific, fictitious name. One misrepresentation that the callers made was that they pretended to

be law enforcement, and informed the victims that they owed money to the Internal Revenue Service (“IRS”) for unpaid taxes. The caller would then tell the victim that if he or she did not pay, he or she would be immediately arrested and go to jail. The caller would then instruct the victim to send a MoneyGram for a certain amount of money to a specific location and to a specific, fictitious name.

3. Manish Patel possessed fraudulent driver’s licenses that included the fictitious names of the recipients of the MoneyGrams, but contained a photo of himself. He used these fraudulent driver’s licenses to pick up the MoneyGrams.

4. Nikita Shukla participated by driving Manish Patel to pick up the fraudulent MoneyGrams. Shukla and Patel frequently picked up several MoneyGrams a day from various locations using fraudulent driver’s licenses.

5. Patel and Shukla were allowed to keep a certain percentage of the fraud proceeds, but then Shukla and Patel deposited the remaining cash into various bank accounts.

6. The total amount of loss caused by the scheme is not known. However, Patel used at least 147 false identities to receive over \$1,100,000 in fraud proceeds from over 1,000 fraudulent transactions.

**COUNTS ONE THROUGH FOUR**  
**(Wire Fraud)**

**THE GRAND JURY FURTHER CHARGES:**

7. The allegations set forth above in paragraphs one through six of this Indictment are hereby incorporated in support of the following charges as if set forth in full here.

8. On the dates specified in the chart below, in the Eastern District of Wisconsin and elsewhere,

**MANISH PATEL and  
NIKITA SHUKLA,**

as specified in the chart below, for the purpose of executing the scheme described in paragraphs one through six of this Indictment, and attempting to do so, caused the following interstate wire communications to take place:

<b>Count</b>	<b>Defendants</b>	<b>Date</b>	<b>Description of Interstate Wire</b>
One	Manish Patel & Nikita Shukla	March 6, 2017	MoneyGram for \$2,000 sent from Minnesota and received at the Greenfield, Wisconsin Walmart.
Two	Manish Patel & Nikita Shukla	March 10, 2017	MoneyGram for \$2,450 sent from Texas and received at the Delavan, Wisconsin Walmart.
Three	Manish Patel & Nikita Shukla	May 10, 2017	MoneyGram for \$1,600 sent from New Jersey and received at the Greendale, Wisconsin Walmart.
Four	Manish Patel & Nikita Shukla	May 10, 2017	MoneyGram for \$650 sent from Kentucky and received at the Greenfield, Wisconsin Walmart.

All in violation of Title 18, United States Code, Sections 1343 and 2.

**FORFEITURE NOTICE**

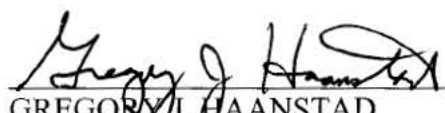
1. Upon conviction of one or more of the wire fraud offenses in violation of Title 18, United States Code, Section 1343, set forth in Counts Two through Five of the Indictment, or upon conviction of the offense of conspiracy to commit wire fraud in violation of Title 18, United States Code, Section 1349, set forth in Count One of this Indictment, the defendants shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the offense or offenses of conviction. The property to be forfeited includes, but is not limited to, a sum of money equal to the proceeds derived from the offense or offenses.

2. If any of the property described above, as a result of any act or omission by a defendant: cannot be located upon the exercise of due diligence; has been transferred or sold to, or deposited with, a third person; has been placed beyond the jurisdiction of the Court; has been substantially diminished in value; or has been commingled with other property which cannot be subdivided without difficulty, the United States of America shall be entitled to forfeiture of substitute property, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

A TRUE BILL:

  
\_\_\_\_\_  
FOREPERSON

Dated: 05/23/17

  
\_\_\_\_\_  
GREGORY J. HAANSTAD  
United States Attorney

Name of Defendant: <b>Manish B. Patel</b>		Address: City, State and Zip Code: <b>Chicago, IL</b>		
Date of Birth: <b>XX-XX- 1991</b>		Occupation: <b>Unknown</b>		
Name of Defendant's Attorney: <b>Joshua Uller/Gabriele A. Leija</b>		Address of Defendant's Attorney: <b>Federal Defender Services, #517 East Wisconsin Avenue, #182, Milwaukee, WI 53202</b>		
Name of U.S. Attorney: <b>Zachary Corey</b>				
Has warrant been issued? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO		When? <b>5/12/217</b>	By Whom?	
Has warrant been executed? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO		When? <b>5/16/2016</b>	Where?	
Has defendant appeared before a Magistrate? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO		When? <b>May 16, 2017 (I/A)</b>	Who? <b>William E. Duffin</b>	
Is the defendant in custody? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO		Where? <b>Federal</b>		
Pretrial Scheduling Conference Necessary? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO				
Issue: WARRANT	SUMMONS	NOTICE	MISDEMEANOR	FELONY
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Milwaukee Case <input checked="" type="checkbox"/> Green Bay Case <input type="checkbox"/> County: Milwaukee				
Minor Offense				
Petty Offense				
Arrestment & plea before:		Judge:	Magistrate:	

(The above information to be furnished in duplicate (1 copy for file and 1 copy for Marshal with 2 conformed copies of indictment and/or information of defendant))

**THE ABOVE INFORMATION TO BE FURNISHED IF KNOWN**

Count	Date	Charge	Penalty
One	9/28/2016 – 5/10/2017	Conspiracy to Commit Wire Fraud; 18 U.S.C. § 1349 against Nikita Shukla and Manish Patel	20 years imprisonment; \$250,000 fine; 3 years supervised release; \$100 special assessment

Count	Date	Charge	Penalty
Two	March 6, 2017	Wire Fraud; 18 U.S.C. §§ 1343 & 2 against Nikita Shukla and Manish Patel	20 years imprisonment; \$250,000 fine; 3 years supervised release; \$100 special assessment
Three	March 10, 2017	Wire Fraud; 18 U.S.C. §§ 1343 & 2 against Nikita Shukla and Manish Patel	20 years imprisonment; \$250,000 fine; 3 years supervised release; \$100 special assessment
Four	May 10, 2017	Wire Fraud; 18 U.S.C. §§ 1343 & 2 against Nikita Shukla and Manish Patel	20 years imprisonment; \$250,000 fine; 3 years supervised release; \$100 special assessment
Five	May 10, 2017	Wire Fraud; 18 U.S.C. §§ 1343 & 2 against Nikita Shukla and Manish Patel	20 years imprisonment; \$250,000 fine; 3 years supervised release; \$100 special assessment

Agency/Agent: USSS/Brian Wallander

OCDETF:  YES  NO

Name of Defendant: <b>Nakita Shukla</b>		Address: City, State and Zip Code: <b>Chicago, IL</b>		
Date of Birth: <b>XX-XX- 1991</b>		Occupation: <b>Unknown</b>		
Name of Defendant's Attorney: <b>Joshua Uller/Gabriele A. Leija</b>		Address of Defendant's Attorney: <b>Federal Defender Services, #517 East Wisconsin Avenue, #182, Milwaukee, WI 53202</b>		
Name of U.S. Attorney: <b>Zachary Corey</b>				
Has warrant been issued? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO		When? <b>5/12/2017</b>	By Whom?	
Has warrant been executed? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO		When? <b>5/16/2016</b>	Where?	
Has defendant appeared before a Magistrate? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO		When? <b>May 16, 2017 (I/A)</b>	Who? <b>William E. Duffin</b>	
Is the defendant in custody? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO		Where? <b>Federal</b>		
Pretrial Scheduling Conference Necessary? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO				
Issue: WARRANT	SUMMONS	NOTICE	MISDEMEANOR	FELONY
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Milwaukee Case <input checked="" type="checkbox"/> Green Bay Case <input type="checkbox"/> County: Milwaukee				
Minor Offense				
Petty Offense				
Arraignment & plea before:		Judge:	Magistrate:	

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Five	May 10, 2017	Wire Fraud; 18 U.S.C. §§ 1343 & 2 against Nikita Shukla and Manish Patel	20 years imprisonment; \$250,000 fine; 3 years supervised release; \$100 special assessment

Agency/Agent: USSS/Brian Wallander

OCDETF:  YES  NO