

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN
FILED

2017 DEC 12 P 12:06

UNITED STATES OF AMERICA,

Plaintiff, STEPHEN C. DRIES
CLERK

17-CR-212

v.

Case No. _____
[18 U.S.C. §§ 2, 1343, & 1349]

MOIN GOHIL,
NAKUL CHETIWAL,
PRATIK PATEL, and
PARVEZ JIWANI,

Defendants.

INDICTMENT

THE GRAND JURY CHARGES:

INTRODUCTION
(The Scheme to Defraud)

1. Beginning by at least January 25, 2016, and continuing until on or about November 24, 2017, in the State and Eastern District of Wisconsin and elsewhere,

**MOIN GOHIL, NAKUL CHETIWAL, PRATIK PATEL, and
PARVEZ JIWANI**

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 false misrepresentations to them, which caused the victims to send an electronic transfer of money—such as a MoneyGram—to a specific location and to a specific, fictitious name. One

misrepresentation that the callers made was that they pretended to work for the Internal Revenue Service (“IRS”) and called to collect unpaid taxes. The caller would then tell the victim that if he or she did not pay, he or she would be immediately arrested. The caller would then instruct the victim to send an electronic transfer of money to a specific location and to a specific, fictitious name.

3. Moin Gohil, Nakul Chetiwal, Parvez Jiwani, and others possessed fraudulent driver’s licenses that included the fictitious names of the recipients of the electronic transfer of money, but contained a photo of themselves. They used these fraudulent driver’s licenses to pick up the electronic transfers of money.

4. Pratik Patel participated in the scheme to defraud by driving Moin Gohil to pick up at least two of the fraudulent electronic transfers of money.

5. Moin Gohil, Nakul Chetiwal, Parvez Jiwani, and others frequently picked up several MoneyGrams a day from various locations using fraudulent driver’s licenses.

6. Moin Gohil, Nakul Chetiwal, Parvez Jiwani, and others were allowed to keep a certain percentage of the fraud proceeds, but then gave the remaining cash to other members of the scheme to defraud.

7. Moin Gohil, Nakul Chetiwal, and Parvez Jiwani received at least \$698,204.39 in fraud proceeds from approximately 555 victims.

COUNT ONE
(Conspiracy to Commit Wire Fraud)

THE GRAND JURY FURTHER CHARGES:

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

9. Beginning on or about May 24, 2017, and continuing through on or about August 29, 2017, in the Eastern District of Wisconsin, and elsewhere:

**MOIN GOHIL and
NAKUL CHETIWAL,**

knowingly conspired with each other to commit wire fraud.

In violation of Title 18 United States Code, Section 1343, all in violation of Title 18, United States Code, Section 1349.

COUNTS TWO THROUGH FIVE
(Wire Fraud)

THE GRAND JURY FURTHER CHARGES:

10. The allegations set forth above in paragraphs one through seven of this indictment are hereby incorporated in support of the following charges as if set forth in full here.

11. On or about the dates specified in the chart below, in the Eastern District of Wisconsin and elsewhere

**MOIN GOHIL, PRATIK PATEL, and
PARVEZ JIWANI**

as specified in the chart below, for the purpose of executing the scheme described in paragraphs one through seven of this Indictment, and attempting to do so, caused the following interstate wire communications to be transmitted, each transmission constituting a separate count:

Count	Defendant(s)	Date	Description of Interstate Wire
Two	Moin Gohil	May 12, 2017	MoneyGram for \$500 sent from Maryland and received in Mt. Pleasant, Wisconsin.
Three	Moin Gohil and Pratik Patel	May 16, 2017	MoneyGram for \$1,000 sent from Mt. Pleasant, Wisconsin and received in Illinois.
Four	Moin Gohil and Pratik Patel	May 16, 2017	MoneyGram for \$1,400 sent from Sturtevant, Wisconsin and received in Illinois.
Five	Parvez Jiwani	May 16, 2017	MoneyGram for \$936 sent from Sturtevant, Wisconsin and received in Tennessee.

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

FORFEITURE NOTICE

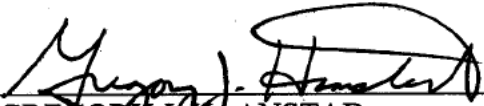
12. Upon conviction of one or more of the wire fraud offenses in violation of Title 18, United States Code, Section 1343, set forth in Counts Two through Five of the Indictment, or upon conviction of the offense of conspiracy to commit wire fraud in violation of Title 18, United States Code, Section 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.

13. 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: 12-12-17


GREGORY J. HAANSTAD
United States Attorney