



UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

January 2023 Grand Jury

UNITED STATES OF AMERICA,

Plaintiff,

v.

SHRAY GOEL and
SHAUNIK RAHEJA,

Defendants.

No. 2:23-CR-623(A)-WLH

F I R S T
S U P E R S E D I N G
I N D I C T M E N T

[18 U.S.C. § 1349: Conspiracy to
Commit Wire Fraud;
18 U.S.C. § 1343: Wire Fraud;
18 U.S.C. § 1028A(a)(1):
Aggravated Identity Theft;
18 U.S.C. § 981(a)(1)(C) and 28
U.S.C. § 2461(c): Criminal
Forfeiture]

The Grand Jury charges:

COUNT ONE

[18 U.S.C. § 1349]

[ALL DEFENDANTS]

A. INTRODUCTORY ALLEGATIONS

1. At times relevant to this First Superseding Indictment:

a. Defendant SHRAY GOEL resided in the Central District
of California and Milwaukee, Wisconsin, among other places.

b. Defendant SHAUNIK RAHEJA resided in Denver, Colorado,
among other places.

1 c. Defendants GOEL and RAHEJA owned and operated a short-
2 term property rental business under various names including Abbot
3 Pacific LLC, marketing properties for short-term rental on Airbnb,
4 Inc. ("Airbnb"), HomeAway, Inc. (dba HomeAway.com or Vrbo.com)
5 ("Vrbo"), and other online property rental platforms.

6 d. Defendants GOEL and RAHEJA and others working with
7 them owned and leased properties throughout the United States for the
8 rental business, including properties in Los Angeles, California;
9 Malibu, California; Marina Del Rey, California; Denver, Colorado;
10 Chicago, Illinois; Davenport, Florida; Savannah, Georgia;
11 Bloomington, Indiana; South Bend, Indiana; Cleveland, Ohio;
12 Nashville, Tennessee; Austin, Texas; Dallas, Texas; and Milwaukee,
13 Wisconsin, among other places. By 2019, they were managing nearly
14 100 properties across the United States.

15 e. Airbnb was an online platform and marketplace for
16 short-term and long-term property rentals and experiences,
17 facilitating connections between hosts and guests. With respect to
18 short-term rentals:

19 i. Airbnb's terms of service governed access to and
20 use of the Airbnb platform. Among other terms, the terms of service
21 included terms specific for hosts and terms applicable to all
22 listings created through the Airbnb platform.

23 ii. Airbnb's terms of service required users, both
24 hosts and guests, to register an account (which required agreement to
25 the terms of service) in order to use features of the platform
26 including publishing or booking a listing; all users were required to
27 provide accurate, current, and complete information during the
28

1 registration process and to keep their information up to date at all
2 times.

3 iii. Airbnb's terms of service prohibited users from
4 assigning or transferring their account to anyone else or disclosing
5 account credentials to any third party. While the Airbnb platform
6 had features to allow individual hosts to add other users as co-
7 hosts, such that other users could take certain actions in relation
8 to the listings, such as accepting booking requests, messaging
9 guests, and updating listing fees and calendar availability, the host
10 remained solely responsible and liable for any listings published on
11 the platform for their account.

12 iv. Airbnb's terms of service prohibited users from
13 using the platform to publish, submit, or transmit anything that was
14 deceptive, fraudulent, false, or misleading (either directly or by
15 omission or failure to update information).

16 v. Airbnb's terms of service required hosts to
17 comply with all laws, rules, and regulations applicable to their
18 listings including laws, rules, and regulations requiring hosts to
19 obtain licenses, permits, or registrations from state or local
20 authorities.

21 vi. Airbnb's terms of service required hosts to
22 provide accurate information concerning properties being listed,
23 including the description of the properties, their location, and
24 their calendar availability, that is, the availability of the
25 properties for rental on listed dates; hosts were required to keep
26 listing information (including calendar availability) up to date at
27 all times; multiple bookings of the same property for the same or
28 overlapping dates ("double bookings") were not allowed.

1 vii. Under Airbnb's terms of service, once a guest
2 requested to book a listing at a published price, the host could not
3 ask the guest to pay a higher price, and once a host accepted a
4 booking or a booking was pre-approved, the host had a legally binding
5 agreement with the guest to host the guest at the booked listing on
6 the booked dates for the published price.

7 viii. Following a confirmed booking, Airbnb would
8 send the guest a booking confirmation and collect payment for the
9 reservation, which Airbnb would hold until 24 hours after the guest
10 checked into the listing, at which time Airbnb would release the
11 payment to the host.

12 ix. A confirmed booking granted the guest a limited
13 license to enter, occupy, and use the booked listing for the duration
14 of the booked reservation. Hosts were not permitted to cancel
15 confirmed bookings except as authorized by Airbnb's policies (for
16 example, legitimate concerns about a guest's behavior, as discussed
17 further below, or extenuating circumstances, as defined in Airbnb's
18 policies). Hosts were prohibited from discriminating against anyone
19 on the basis of race, national origin, religion, gender, gender
20 identity, physical or mental disability, medical condition, marital
21 status, age, or sexual orientation.

22 x. If a host cancelled outside of Airbnb's policies,
23 Airbnb could publish an automated review on the listing showing the
24 host cancellation and impose a cancellation fee on the host's
25 account. Further, if a host had to cancel because of extenuating
26 circumstances, as defined by Airbnb policies, a guest would be
27 entitled to a full refund.

1 xi. Hosts could establish house rules including
2 limits on the number of guests and extra charges for additional
3 guests, and a host could cancel a reservation if the host had
4 legitimate concerns about a guest's behavior, including unauthorized
5 parties, and in such a situation, a guest might not be entitled to a
6 refund.

7 xii. Hosts could elect to have a strict cancellation
8 policy apply to their listings such that, absent extenuating
9 circumstances or in some instances a limited window following
10 advanced bookings, a guest would not receive a refund for canceling a
11 confirmed reservation. A host could voluntarily agree to give a
12 guest a refund if the guest cancelled a listing outside a host's
13 cancellation policy, but the host was not obligated to do so.

14 xiii. Following a completed reservation, guests
15 and hosts could rate each other and post reviews of their experience,
16 and these ratings and reviews were visible to other users of the
17 Airbnb platform.

18 xiv. Hosts that cancelled confirmed reservations could
19 receive negative guest ratings and reviews, and hosts that
20 continually cancelled confirmed reservations could also have their
21 payouts cancelled and their listings suspended and ultimately removed
22 from the platform.

23 B. THE OBJECT OF THE CONSPIRACY

24 2. Beginning on a date unknown but no later than in or about
25 October 2017, and continuing through at least in or about November
26 2019, in Los Angeles County, within the Central District of
27 California, and elsewhere, defendants GOEL and RAHEJA knowingly
28 conspired with each other and others known and unknown to the Grand

1 Jury to commit wire fraud, in violation of Title 18, United States
2 Code, Section 1343, by conspiring to and executing a scheme to
3 defraud Airbnb, Vrbo, and other online property rental platforms (the
4 "rental platforms"), and guests booking properties through those
5 rental platforms, as to material matters, and to obtain money and
6 property from such victims by means of material false and fraudulent
7 pretenses, representations, and promises, and the concealment of
8 material facts.

9 C. THE MANNER AND MEANS OF THE CONSPIRACY

10 3. The object of the conspiracy was to be carried out, and was
11 carried out, in substance, as follows:

12 a. Defendants GOEL and RAHEJA operated a double-booking-
13 bait-and-switch scheme on the rental platforms, secretly double-
14 booking properties and then inventing fake last-minute excuses for
15 cancelling overbooked guests or tricking them into switching to
16 inferior replacements.

17 b. Defendants GOEL and RAHEJA and others working with
18 them and at their direction profited from the scheme by running a
19 secret bidding war to rent properties to the highest bidder, by
20 keeping all of their properties in any given area at maximum
21 capacity, and by otherwise being able to choose among overbooked
22 guests, and they often refused to agree to refunds for guests who
23 were entitled to them.

24 c. In seeking to maximize their profits, defendants GOEL
25 and RAHEJA made decisions about which guests to keep and which to
26 cancel were based in part on racial prejudices and discrimination.
27 For instance, defendants GOEL and RAHEJA discriminated against guests
28 from certain racial and ethnic groups including Black guests (or

1 guests whom they perceived to be Black or African American), trying
2 to avoid renting to these guests and cancelling reservations from
3 these guests using false reasons for the cancellations, and in this
4 way depriving these guests of their property interest in the
5 reservations and otherwise causing these guests to suffer monetary
6 losses when their reservations were cancelled.

7 d. To carry out the scheme, defendants GOEL and RAHEJA
8 and others working with them and at their direction would post
9 listings of properties for short-term rental on the rental platforms,
10 creating listings throughout the course of the scheme and using other
11 listings they had created dating back to at least 2016.

12 e. In posting listings, defendants GOEL and RAHEJA and
13 others working with them and at their direction would use false and
14 misleading representations concerning the identities of the hosts,
15 the addresses of the properties, the availability of the properties
16 for rental on listed dates, the reserved status of properties for
17 guests with confirmed bookings, the condition of the properties, and
18 the veracity and completeness of the reviews of the properties and
19 hosts, among other false and misleading representations.

20 f. Defendants GOEL and RAHEJA others working with them
21 and at their direction would post multiple listings of the same
22 property, listing the property at different prices for the same date
23 to try to maximize the price they could charge for each property on a
24 given date, and trying to maximize occupancy rates on a given date by
25 using overbooked properties to fill open properties in the same area,
26 including using multiple listings of frequently-booked properties as
27 bait to trick guests into booking those properties, intending to
28

1 switch overbooked guests to less frequently-booked properties in the
2 same area.

3 g. Defendants GOEL and RAJEJA and others working with
4 them and at their direction would use fake host names and in certain
5 instances other people's identities and identification documents (the
6 "fake hosts" or "fake host accounts"), creating these fake host
7 accounts throughout the course of the scheme and using other fake
8 host accounts they had created dating back to at least 2014. They
9 used the fake host accounts to conceal their own identities, to
10 double-book properties, to hide negative reviews by de-listing and
11 re-listing properties, to protect against properties being removed
12 from the rental platforms (by having properties listed through
13 multiple hosts), and to continue to list properties after they had
14 been banned from Vrbo in 2015 because of repeated host cancellations
15 and guest complaints.

16 h. The fake host accounts included: "Alex & Brittany,"
17 "Annie & Chase," "Becky & Andrew," "Jess & Tyler," "Kelsey & Jean,"
18 "Kris & Becky," "Rachel & Pete," "Sarah & Jason," "Stephen F.," and
19 "Taylor & Ryan," among other names. Defendants GOEL and RAHEJA and
20 others working with them and at their direction would pretend to be
21 the fake hosts in communications with guests and the rental
22 platforms.

23 i. In at least some instances, defendants GOEL and RAHEJA
24 and others working with them and at their direction would list or
25 caused to be listed addresses that had no residential structure, were
26 unaffiliated with the co-conspirators, or did not exist at all
27 (insofar as the addresses did not correspond to any address in the
28 relevant county records system and could not be found through any

1 widely used Global Position System (GPS) such as google.com) ("fake
2 addresses"). The use of fake addresses helped the co-conspirators
3 create duplicate listings for a single property, evade local rules
4 and regulations governing short-term rentals, and control who had
5 access to properties.

6 j. Defendants GOEL and RAHEJA and others working with
7 them and at their direction would post misleading positive reviews of
8 their listings by booking a listing using a fake host account other
9 than the one being used to list a property, and using the fake host
10 account that booked the listing, they would post a misleading
11 positive review, falsely indicating that the review was from an
12 unaffiliated, third-party guest who had stayed at the property.

13 k. In at least some instances, defendants GOEL and RAHEJA
14 and others working with them and at their direction would not update
15 a property's calendar availability after the property had been
16 booked, and they continued to advertise the booked property as being
17 available for rental on the already-booked dates, both by listing the
18 property through multiple listings on a single rental platform and by
19 cross listing the property on different rental platforms. The
20 duplicate listings allowed the co-conspirators to rent the same
21 property to multiple guests for the same or overlapping dates - i.e.,
22 to double book the property.

23 l. Defendants GOEL and RAHEJA and others working with
24 them and at their direction would conceal the double bookings and the
25 double-booking practice of the business, hiding the fact that
26 properties were double-booked and/or still being listed after being
27 booked, knowing that prospective guests would not reserve properties
28 and pay for reservations if they knew that the properties had been or

1 could be double-booked, and that the rental platforms might prohibit
2 them from continuing to list properties if the double-bookings were
3 discovered.

4 m. After a listing had been booked, defendants GOEL and
5 RAHEJA and others working with them and at their direction would
6 choose which (if any) guest to host, often selecting the guest who
7 had booked the property at the highest price or who otherwise had the
8 most profitable reservation, and, for an overbooked guest or a guest
9 they did not otherwise host or want to host, they would do one of the
10 following:

11 i. They provided the guest with a false excuse as to
12 why a booked property was unavailable, telling the guest the property
13 had a plumbing problem or some other supposedly unforeseen issue, and
14 then: (1) cancelled the reservation, but resisted the assessment of
15 any cancellation fees; (2) convinced the guest to move to an
16 alternative property by falsely representing the alternative was
17 comparable or an upgrade, and denied refunds if guests complained; or
18 (3) lied to the rental platforms about the guest or the reservation
19 to keep money from guests entitled to refunds.

20 ii. They convinced the guest to cancel the
21 reservation under false pretenses including promising the guest a
22 full refund when, in at least some instances, they lied to the rental
23 platforms about the guest or the reservation including lies about
24 promised refunds.

25 iii. They stopped responding to the guest prior to
26 check in, and in at least some instances, they lied to the rental
27 platforms about the guest or the reservation, including falsely
28

1 telling the rental platforms the guest had stayed in the booked
2 property.

3 n. If guests complained about a property or posted a
4 negative review, defendants GOEL and RAHEJA and others working with
5 them and at their direction would sometimes post and caused to be
6 posted false negative reviews about the guests, and they would remove
7 or de-activate the negatively reviewed listing and use other listings
8 of the same property or re-list the property with a new listing
9 profile or an entirely new host profile.

10 o. Defendant GOEL would pressure, threaten, and insult
11 Airbnb customer service representatives and demand to be transferred
12 to another representative or a supervisor when representatives
13 indicated they were going to give refunds over defendant GOEL's
14 objections, which sometimes resulted in representatives denying
15 refunds to which guests were entitled, or transferring defendant GOEL
16 to a representative or supervisor who might.

17 p. The co-conspirators used the lies and
18 misrepresentations to obtain payments from guests who would not have
19 otherwise booked a reservation for one of the co-conspirators'
20 properties. The lies and misrepresentations also helped the co-
21 conspirators keep money from guests entitled to refunds, to avoid
22 cancellation fees and negative reviews, and to keep the scheme going
23 in the various ways discussed above. The last-minute nature of the
24 cancellations also caused guests and the rental platforms to suffer
25 losses when guests were forced to find last-minute alternative
26 accommodations.

27 q. In furtherance of the scheme, defendants GOEL and
28 RAHEJA and others working with them and at their direction used the

following properties, among others, and the following fake property addresses, among others, involving reservations booked by the following guests, among others:

Real Property Address	Fake Property Address (es)	Guests
1193 Angelina Street, Austin, TX 78702		J.Cof., P.C., E.I., K.S.
1342 North Greenview Avenue, Chicago, IL 60642		T.C., S.W.
1612 West Beach Avenue, Chicago, IL 60622	1600 West Beach Avenue, Chicago, IL 60622	K.F., S.P.
1656 West Erie Street, Chicago, IL 60622	1650 West Erie Street, Chicago, IL 60622	C.A., J.Cou., H.H., J.K., C.N., M.S.
1701 4th Avenue North, Nashville, TN, 37208	1650 5th Avenue North, Nashville, TN, 37208	A.H., A.Ste., L.S., C.V.
18922 Pacific Coast Highway, Malibu, CA 90265	20220 Pacific Coast Highway, Malibu, CA 90265	M.Bri., R.B., S.B., T.G., J.H., E.N., P.Lar., C.S., A.W., K.W., P.Z.
20006 Pacific Coast Highway, Malibu, CA 90265	20000 Pacific Coast Highway, Malibu, CA 90265	J.B., L.D., M.K., S.M.
20466 Pacific Coast Highway, Malibu, CA 90265		M.Bha., M.F., L.Mar., J.S.
20648 Pacific Coast Highway, Malibu, CA 90265		C.B., G.J., B.L., E.N., J.T.
20650 Pacific Coast Highway, Malibu, CA 90265		B.B., J.Pat., J.Pon., R.H.
209 Montreal Street, Los Angeles, CA 90293		A.M., B.P., S.R., R.C.

Real Property Address	Fake Property Address (es)	Guests
2737 North Kenmore Avenue, Chicago, IL 60614	2700 North Kenmore Avenue, Chicago, IL 60614	A.C., P.Laz.
2272 North Lincoln Avenue, Chicago, IL 60614	2270 North Lincoln Avenue, Chicago, IL 60614	J.Cas., M.D.
3522 Shoshone Street, Denver, CO 80211		S.A.
521 San Juan Avenue, Los Angeles, CA 90291		T.S., K.L.
615 Brooks Avenue, Los Angeles, CA 90291		T.G., J.Per.
6304 Vista Del Mar, Los Angeles, CA 90293		J.G., D.L., M.F.
915 26th Street, Denver, CO 80205	2500 Curtis Street, Denver, CO 80285	D.Car., F., W.N., L.Mal.
842 North Wood Street, Chicago, IL 60622	825 North Wood Street, Chicago, IL 60622 850 North Wood Street, Chicago, IL 60622; 925 North Wood Street, Chicago, IL 60622; 942 North Wood Street, Chicago, IL 60622	A.C., M.D., M.G., D.W.

r. In 2018 and 2019, in the course of the scheme and in furtherance of it, defendants GOEL and RAHEJA and others working with them and at their direction booked more than 10,000 reservations through Airbnb, receiving more than \$7 million in payouts on those reservations; they booked additional and sometimes conflicting

1 reservations through Vrbo and received more than \$1.5 million in
2 additional payouts from those reservations.

3 D. OVERT ACTS

4 4. On or about the following dates, in furtherance of the
5 conspiracy and to accomplish its object, defendants GOEL and RAHEJA,
6 and others known and unknown to the Grand Jury, committed and
7 willfully caused others to commit the following overt acts, among
8 others, within the Central District of California and elsewhere:

9 Overt Act No. 1: On October 11, 2017, defendant GOEL submitted
10 or caused the submission of a driver's license in the name of
11 identity victim D.Can., as the identification document for host
12 account "Danielle And Alex."

13 Overt Act No. 2: On November 5, 2017, defendant GOEL created or
14 caused the creation of vacationsbybecky@gmail.com, listing defendant
15 GOEL's cell phone number as part of the subscriber information; this
16 account was later associated with the "Kris And Becky" host account
17 on Airbnb.

18 Overt Act No. 3: On November 30, 2017, defendants GOEL and
19 RAHEJA created or caused the creation of host account 160722200 on
20 Airbnb, thereafter labeled "Jess And Tyler."

21 Overt Act No. 4: On December 4, 2017, defendants GOEL and RAHEJA
22 created or caused the creation of duplicate listings for the same
23 property on Airbnb, creating or causing the creation of listing
24 numbers 22068178 and 22083352 for 1203 Cotton Street, Austin, TX
25 78702.

26 Overt Act No. 5: On December 15, 2017, defendant GOEL created or
27 caused the creation of host account 162816699 on Airbnb, thereafter
28 labeled "Kris And Becky."

1 Overt Act No. 6: On January 23, 2018, defendants GOEL and RAHEJA
2 created or caused the creation of vacationsbyj@gmail.com, which was
3 associated with the "Jess And Tyler" host account.

4 Overt Act No. 7: On January 26, 2018, defendants GOEL and RAHEJA
5 cancelled or caused the cancellation of reservation 601542850 on
6 Airbnb, host "Sarah and Jason," address 20220 Pacific Coast Highway,
7 Malibu, CA 90265, with guest J.H., scheduled to start on January 27,
8 2018, based on the false and misleading representation to J.H. and
9 Airbnb that the property had "a leak."

10 Overt Act No. 8: On May 8, 2018, defendants GOEL and RAHEJA
11 cancelled or caused the cancellation of reservation 642107803 on
12 Airbnb, host "Rachel and Pete," address 1650 West Erie Street,
13 Chicago, IL 60622, with guest J.K., scheduled to start the same day,
14 based on the false and misleading representation to J.K. and Airbnb
15 that the property had "clogged toilets and sewer water coming from
16 the shower drain."

17 Overt Act No. 9: On May 9, 2018, defendants GOEL and RAHEJA
18 misleadingly told guest K.W., or caused K.W. to be misleadingly told,
19 that the property K.W. had booked with reservation 748972775 on
20 Airbnb, host "Stephen F," had a plumbing issue, but K.W. could stay
21 at an alternate location, and defendant GOEL resisted K.W.'s refund
22 request when K.W. refused to stay at the alternate location after
23 realizing the host had double booked the original location and lied
24 about the plumbing issue.

25 Overt Act No. 10: On May 14, 2018, defendants GOEL and RAHEJA
26 created or caused the creation of a duplicate listing for the same
27 property on Airbnb, creating or causing the creation of listing
28

1 number 25055804, which duplicated listing number 23904249 for 521 San
2 Juan Avenue, Los Angeles, CA 90291.

3 Overt Act No. 11: On July 2, 2018, defendant RAHEJA created or
4 caused the creation of host account 199312128 on Airbnb, thereafter
5 labeled "Taylor And Ryan" and "Ryan J."

6 Overt Act No. 12: On July 9, 2018, defendant RAHEJA created or
7 caused the creation of vacationsbytay@gmail.com, which was associated
8 with the "Taylor And Ryan" and "Ryan J" host account on Airbnb.

9 Overt Act No. 13: On July 17, 2018, defendants GOEL and RAHEJA
10 cancelled or caused the cancellation of reservation 816591996 on
11 Airbnb, host "Rachel and Pete," address 1650 West Erie Street,
12 Chicago, IL 60622, with guest C.A., scheduled to start the same day,
13 based on the admission to C.A. that the host had double booked, and
14 promising C.A. a refund that defendants GOEL and RAHEJA and others
15 working with them later denied promising.

16 Overt Act No. 14: On August 5, 2018, defendants GOEL and RAHEJA
17 cancelled or caused the cancellation of reservation 876595502, host
18 "Stephen F," address 20648 Pacific Coast Highway, Malibu, CA 90265,
19 with guest B.L., scheduled to start the same day, based on the false
20 and misleading representation to B.L. and Airbnb that the property
21 had "a toilet leak that is causing a horrible smell."

22 Overt Act No. 15: On August 18, 2018, defendants GOEL and RAHEJA
23 created or caused the creation of a duplicate listing for the same
24 property on Airbnb, creating or causing the creation of listing
25 number 27851659, which duplicated listing numbers 21518216, 22044422,
26 22191697, 22530398, and 25841830, for 6304 Vista Del Mar, Los
27 Angeles, CA 90293.

1 Overt Act No. 16: On September 14, 2018, defendants GOEL and
2 RAHEJA misleadingly told guest C.B., or caused C.B. to be
3 misleadingly told, that the property C.B. had booked with Airbnb
4 reservation 869534179, host "Stephen F," had a plumbing issue, but
5 C.B. could stay at an alternate location, and after initially
6 promising C.B. a refund because C.B. refused to stay at the alternate
7 address after realizing it was a downgrade, defendants GOEL and
8 RAHEJA and others working with them reneged on this promise.

9 Overt Act No. 17: On September 18, 2018, defendant GOEL created
10 or caused the creation of host account 215967282 on Airbnb, labeled
11 "Nira G."

12 Overt Act No. 18: On September 28, 2018, defendants GOEL and
13 RAHEJA misleadingly told guest P.Laz., or caused P.Laz. to be
14 misleadingly told, that the property P.Laz. had booked with
15 reservation 869534179 on Airbnb, host "Stephen F," address 2700 North
16 Kenmore Avenue, Chicago, IL 60614, had a plumbing issue, but P.Laz.
17 could stay at an alternate location, and defendants GOEL and RAHEJA
18 and others working with them cancelled the reservation, or caused the
19 reservation to be cancelled, when P.Laz. refused the alteration.

20 Overt Act No. 19: On October 6, 2018, defendants GOEL and RAHEJA
21 cancelled and caused the cancellation of reservation 974043092 on
22 Airbnb, host "Rachel And Pete," address 1193 Angelina St, Austin, TX
23 78702, with guest K.S., based on the false and misleading
24 representation to K.S. and Airbnb that that house was being sold.

25 Overt Act No. 20: On December 13, 2018, defendant GOEL submitted
26 or caused the submission of a driver's license in the name of
27 identity victim A.Sch., as the identification document for host
28 account "Becky And Andrew."

1 Overt Act No. 21: On December 16, 2018, defendants GOEL and
2 RAHEJA submitted or caused the submission of a false negative review
3 on Airbnb for guest K.L., in connection with reservation 1029170771,
4 address 521 San Juan Avenue, Los Angeles, CA 90291, after K.L. left a
5 review stating in part: "DO NOT BOOK. . . . The most major issue was
6 when EIGHT random men showed up on our last night there with the
7 access codes to the gates, claiming they had ALSO booked the house
8 for the night. Turns out there are MULTIPLE LISTINGS for this house
9 on Airbnb, run by different hosts who are booking the place for
10 multiple groups at a time. . . . Needless to say, it didn't feel
11 super safe after this happened."

12 Overt Act No. 22: On December 16, 2018, defendants GOEL and
13 RAHEJA submitted or caused the submission of a false negative review
14 on Airbnb for guest T.S., in connection with reservation 861026162,
15 521 San Juan Avenue, Los Angeles, CA 90291, after T.S. left a review
16 stating in part: "A unit we rented was posted twice by two different
17 hosts with overlapping dates. When we arrived to the unit others
18 were occupying the space we had a reservation for. . . Long story
19 short, our party of 8 had to find another place to stay with less
20 than two hours notice."

21 Overt Act No. 23: On February 15, 2019, defendants GOEL and
22 RAHEJA created or caused the creation of duplicate listings for the
23 same property on Airbnb, creating or causing the creation of listing
24 numbers 32387632 and 32396024, for 615 Brooks Avenue, Los Angeles, CA
25 90291.

26 Overt Act No. 24: On March 3, 2019, defendants GOEL and RAHEJA
27 created or caused the creation of a duplicate listing for the same
28 property on Airbnb, creating or causing the creation of listing

1 number 32780894, which duplicated listing numbers 32387632 and
2 32396024, for 615 Brooks Avenue, Los Angeles, CA 90291.

3 Overt Act No. 25: On April 7, 2019, defendants GOEL and RAHEJA
4 cancelled or caused the cancellation of reservation 1247473227, host
5 "Kelsey and Jean," address 1342 North Greenview Avenue, Chicago, IL
6 60642, with guest S.W., scheduled to start the same day, based on the
7 false and misleading representation to S.W. that the property had a
8 plumbing issue, and promising S.W. a refund that defendants GOEL and
9 RAHEJA and others working with them later denied promising.

10 Overt Act No. 26: On April 27, 2019, defendants GOEL and RAHEJA
11 misleadingly told guest J.Pat., or caused J.Pat. to be misleadingly
12 told, that the property she had booked with reservation 1269386705,
13 host "Becky and Andrew," had a plumbing issue, but J.Pat. could stay
14 at an alternate location, and defendants GOEL and RAHEJA resisted
15 J.Pat.'s refund request when J.Pat. refused to stay at the alternate
16 location after realizing it was a downgrade.

17 Overt Act No. 27: On May 17, 2019, defendants GOEL and RAHEJA
18 cancelled or caused the cancellation of reservation 1284424711, host
19 "Rachel and Pete," address 1650 West Erie Street, Chicago, IL 60622,
20 with guest J.Cou., scheduled to start the same day, based on the
21 false and misleading representation to J.Cou. and Airbnb that the
22 property had "a pretty bad leak."

23 Overt Act No. 28: On June 7, 2019, defendants GOEL and RAHEJA
24 resisted a refund request and falsely claimed to Airbnb that guest
25 M.S. had stayed at a listing at 1650 West Erie Street, Chicago, IL
26 60622, on May 31, 2019, in connection with reservation 1424092340.

27 Overt Act No. 29: On June 20, 2019, defendants GOEL and RAHEJA
28 misleadingly told guest T.G., or caused T.G. to be misleadingly told,

1 that the property T.G. had booked with reservation 1552396852 on
2 Airbnb, host "Danielle and Alex," address 615 Brooks Avenue, Los
3 Angeles, CA 90291, had a plumbing issue, but T.G. could stay at an
4 alternate location.

5 Overt Act No. 30: On June 21, 2019, defendants GOEL and RAHEJA
6 misleadingly told guest M.D., or caused M.D. to be misleadingly told,
7 that the property M.D. had booked with reservation 1318612875 on
8 Airbnb, host "Kelsey And Jean," address 2270 North Lincoln Avenue,
9 Chicago, IL 60614, had a plumbing issue, but M.D. could stay at an
10 alternate location, and defendants GOEL and RAHEJA resisted M.D.'s
11 refund request after M.D. requested a discount for the downgrade.

12 Overt Act No. 31: On June 21, 2019, defendants GOEL and RAHEJA
13 misleadingly told guest J.Cas., or caused J.Cas. to be told, that the
14 property J.Cas. had booked with reservation 1092755018 on Airbnb,
15 host "Kelsey And Jean," had a plumbing issue, but J.Cas. could stay
16 at an alternate location, and defendants GOEL and RAHEJA resisted
17 J.Cas.'s refund request after J.Cas. complained about the alternate
18 location.

19 Overt Act No. 32: On July 1, 2019, defendants GOEL and RAHEJA
20 misleadingly told guest M.F., or caused M.F. to be misleadingly told,
21 that the property M.F. had booked with reservation 1547485785 on
22 Airbnb, host "Stephen F," address 20466 Pacific Coast Highway,
23 Malibu, CA 90265, had a plumbing issue, but M.F. could stay at an
24 alternate location, and defendants GOEL and RAHEJA resisted M.F.'s
25 refund request when M.F. refused to stay at the alternate location
26 after realizing it was a downgrade.

27 Overt Act No. 33: On July 3, 2019, defendants GOEL and RAHEJA
28 cancelled or caused the cancellation of reservation 1383417001 on

1 Airbnb, host "Stephen F," address 20000 Pacific Coast Highway,
2 Malibu, CA 90265, with guest S.M., scheduled to start the same day,
3 based on the false and misleading representation to S.M. and Airbnb
4 that the property had a plumbing issue.

5 Overt Act No. 34: On July 9, 2019, defendants GOEL and RAHEJA
6 cancelled or caused the cancellation of reservation 1485176905 on
7 Airbnb, host "Stephen F," address 20006 Pacific Coast Highway,
8 Malibu, CA 90265, with guest M.K., scheduled to start the same day,
9 based on the false and misleading representation to M.K. and Airbnb
10 that the property had a plumbing issue.

11 Overt Act No. 35: On July 13, 2019, defendants GOEL and RAHEJA
12 created or caused the creation of duplicate listings for the same
13 property on Airbnb, creating listing numbers 36692082 and 36698317
14 for 2710 Whitis Avenue, Austin, Texas 78705.

15 Overt Act No. 36: On July 14, 2019, defendants GOEL and RAHEJA
16 cancelled or caused the cancellation of reservation 1466414763 on
17 Airbnb, host "Sarah and Jason," address 20220 Pacific Coast Highway,
18 Malibu, CA 90265, with guest S.B., scheduled to start the same day,
19 based on the false and misleading representation to S.B. and Airbnb
20 that the property had a plumbing issue.

21 Overt Act No. 37: On July 19, 2019, defendants GOEL and RAHEJA
22 falsely denied promising guest D.W. a refund for reservation
23 1675902441 on Airbnb, host "Kelsey And Jean," address 944 North Wood
24 Street, Chicago, IL 60622.

25 Overt Act No. 38: On August 9, 2019, defendants GOEL and RAHEJA
26 misleadingly told guest E.N., or caused E.N. to be misleadingly told,
27 that the property E.N. had booked with reservation 1113917100 on
28 Airbnb, host "Stephen F," address 20220 Pacific Coast Highway,

1 Malibu, CA 90265, had a plumbing issue, but E.N. could stay at an
2 alternate location, and defendants GOEL and RAHEJA resisted E.N.'s
3 refund request when E.N. refused to stay at the alternate location
4 after realizing it was a downgrade.

5 Overt Act No. 39: On August 20, 2019, defendants GOEL and RAHEJA
6 created or caused the creation of host account 287420514 on Airbnb,
7 labeled "Rafael N."

8 Overt Act No. 40: On September 5, 2019, defendants GOEL and
9 RAHEJA cancelled or caused the cancellation of reservation 1736274216
10 on Airbnb, host "Sarah And Jason," address 1193 Angelina St, Austin,
11 TX 78702, with guest J.Cof., scheduled to start September 7, 2019,
12 based on the false and misleading representation to J.Cof. and Airbnb
13 that: "I received a message from the city this morning that a
14 neighbor complained about our previous guests and we need to attend a
15 hearing next week before we can continue hosting guests less than 30
16 days."

17 Overt Act No. 41: On September 12, 2019, defendants GOEL and
18 RAHEJA misleadingly told guest A.C., or caused A.C. to be
19 misleadingly told, that the property A.C. had booked with reservation
20 1730119825 on Airbnb, host "Becky and Andrew," address 825 North Wood
21 Street, Chicago, IL 60622, had a plumbing issue, but A.C. could stay
22 at an alternate location.

23 Overt Act No. 42: On October 5, 2019, defendants GOEL and RAHEJA
24 cancelled and caused the cancellation of reservation 1731055725 on
25 Airbnb, host "Ryan J," address 2500 Curtis Street, Denver, CO 80285,
26 guest L.Mal., scheduled to start the same day, based on the false and
27 misleading representation to L.Mal. and Airbnb that the property had
28 a plumbing issue.

1 Overt Act No. 43: On October 8, 2019, defendant GOEL created or
2 caused the creation of tripsbynira@gmail.com, listing defendant
3 GOEL's phone number as part of the subscriber information; this
4 account was later associated with the "Nira G" host account on
5 Airbnb.

6 Overt Act No. 44: On October 12, 2019, defendants GOEL and
7 RAHEJA cancelled or caused the cancellation of reservation 2195730665
8 on Airbnb, host "Stephen F," address 20650 Pacific Coast Highway,
9 Malibu, CA 90265, with guest J.Pon., scheduled to start the same day,
10 based on the false and misleading representation to J.Pon. and Airbnb
11 the property had a plumbing issue.

12 Overt Act No. 45: On October 12, 2019, defendants GOEL and
13 RAHEJA cancelled or caused the cancellation of reservation 1405442357
14 on Airbnb, host "Stephen F," address 20650 Pacific Coast Highway,
15 Malibu, CA 90265, with guest B.B., scheduled to start the same day,
16 based on the false and misleading representation to B.B. and Airbnb
17 the property had a plumbing issue.

18 Overt Act No. 46: On October 25, 2019, defendants GOEL and
19 RAHEJA cancelled or caused the cancellation of reservation 1814589412
20 on Airbnb, host "Ryan J," address 3522 Shoshone Street, Denver, CO
21 80211, with guest S.A., scheduled to start the same day, based on the
22 false and misleading representation to S.A. and Airbnb the host had a
23 family emergency.

24 Overt Act No. 47: On November 17, 2019, defendants GOEL and
25 RAHEJA created or caused the creation of listing 40178393 on Airbnb,
26 address 605 San Juan Avenue, Los Angeles, CA 90291, using host
27 account 307701635, labeled "Rafael B."
28

COUNTS TWO THROUGH FOURTEEN

[18 U.S.C. §§ 1343, 2]

[ALL DEFENDANTS]

A. INTRODUCTION

5. The Grand Jury realleges paragraphs 1, 3, and 4 of this First Superseding Indictment here.

B. THE SCHEME TO DEFRAUD

6. Beginning no later than in or about October 2017, and continuing until at least in or about November 2019, in Los Angeles County, within the Central District of California, and elsewhere, defendants GOEL and RAHEJA, together with others known and unknown to the Grand Jury, knowingly and with intent to defraud, devised, participated in, and executed a scheme to defraud the rental platforms, and guests booking properties through the rental platforms, as to material matters, and to obtain money and property from such victims by means of materially false and fraudulent pretenses, representations, and promises and the concealment of material facts.

7. The scheme to defraud operated, in substance, in the manner and through the means described in paragraph 3 and 4 of this First Superseding Indictment.

C. USE OF INTERSTATE WIRES

8. On or about the dates set forth below, in Los Angeles County, within the Central District of California, and elsewhere, for the purpose of executing the above-described scheme to defraud, defendants GOEL and RAHEJA and their co-schemers, together with others known and unknown to the Grand Jury, aiding and abetting each

other, transmitted and caused the transmission of the following items by means of wire communication in interstate commerce:

COUNT	DATE	INTERSTATE WIRING
TWO	12/14/2018	Communication on the Airbnb platform from Airbnb to guest T.S.: "We received a message from Rachel & Pete that their guest refused to leave the property...."
THREE	12/14/2018	Communication on the Airbnb platform from Airbnb to guest K.L.: "...we do understand that there w[as] inconvenience on your part as well. However, since your reservation is not affected, then we can't proceed with any compensation..."
FOUR	02/15/2019	Communication on the Airbnb platform from Airbnb to guest M.Bha.: "...I am sorry to hear that your host needs to cancel your stay..."
FIVE	04/27/2019	Communication on the Airbnb platform from defendant GOEL and others working with him to guest J.Pat.: "*** You are located at: 20650 Pacific Coast Highway Malibu, CA 90265 **Check in 4pm **Check out 10am . . ."
SIX	06/20/2019	Communication on the Airbnb platform from defendant GOEL and others working with him to guest T.G.: "Our Address: **18922 Pacific Coast Highway, Malibu, CA, 90265** ** Check in 4pm ** . . ."
SEVEN	07/01/2019	Communication on the Airbnb platform from defendant GOEL and others working with him to guest M.F.: "You are located at : ** 6304 Vista Del Mar, Playa Del Rey, CA, 90293** **Check in 4pm **Check out 10am . . ."
EIGHT	07/03/2019	Communication on the Airbnb platform from defendant GOEL and others working with him to guest S.M.: "just tried calling you - what is the best number to reach you on."
NINE	07/09/2019	Communication on the Airbnb platform from defendant GOEL and others working with him to guest M.K.: "hey [M.] - what is the best number to reach you on? I'm having a bit of a plumbing problem so i wanted to reach out to you proactively !"
TEN	07/14/2019	Communication on the Airbnb platform from Airbnb to guest S.B.: "I just want to let you know that [the host] can't promise that the toilet will be fixed today . . . He

COUNT	DATE	INTERSTATE WIRING
		mentioned that he already contacted a lot of plumbers but unfortunately no one responded. He wants to cancel the reservation . . ."
ELEVEN	08/09/2019	Communication on the Airbnb platform from defendant GOEL and others working with him to guest E.N.: "You are located at: ** 20648 Pacific Coast Highway Malibu, CA 90265 ** **Check in 4pm **Check out 10am . . ."
TWELVE	10/08/2019	Wires sent through the Airbnb platform associated with a reservation booked by J.Pon. for 20650 Pacific Coast Highway, Malibu, CA 90265, with host "Stephen F"
THIRTEEN	10/12/2019	Communication on the Airbnb platform from defendant GOEL and others working with him to guest B.B.: "Trying to call you, what[']s the best number to reach you?"
FOURTEEN	10/15/2019	Communication on the Airbnb platform from defendant GOEL and others working with him to guest J.Pon.: "[The refund] was sent" in response to the message: "I just spoke with Airbnb, they did not have the record of you requested to give me full refund. Please straighten out this issue immediately. It has been 3 days since I was supposed to stay at your property, in which my family was left stranded due to your plumbing issue."

COUNTS FIFTEEN AND SIXTEEN

[18 U.S.C. §§ 1028A(a)(1), 2(b)]

[DEFENDANT GOEL]

9. The Grand Jury realleges paragraphs 1, 3, 4, 7, and 8 of this First Superseding Indictment here.

10. On or about the dates set forth below, in Los Angeles County, within the Central District of California, and elsewhere, defendant GOEL knowingly transferred, possessed, and used, and willfully caused to be transferred, possessed, and used, without lawful authority, a means of identification that defendant GOEL knew belonged to another person, namely, the names of the individuals identified below by their initials, during and in relation to the offense of Wire Fraud, a felony violation of Title 18, United States Code, Section 1343, as charged in the counts of this First Superseding Indictment identified below:

COUNT	DATES	MEANS OF IDENTIFICATION	PREDICATE FELONY VIOLATION
FIFTEEN	04/15/2019 to 05/08/2019	Name of A.Sch.	COUNT FIVE
SIXTEEN	06/19/2019 to 06/25/2019	Name of D.Can.	COUNT SIX

FORFEITURE ALLEGATION

[18 U.S.C. § 981(a)(1)(C); 28 U.S.C. § 2461(c)]

1. Pursuant to Rule 32.2 of the Federal Rules of Criminal Procedure, notice is hereby given that the United States of America will seek forfeiture as part of any sentence, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), in the event of any defendant's conviction of the offenses set forth in any of Counts One through Sixteen of this First Superseding Indictment.

2. Defendants GOEL and RAHEJA, if so convicted, shall forfeit to the United States of America the following:

a. All right, title, and interest in any and all property, real or personal, constituting, or derived from, any proceeds traceable to the offenses; and

b. To the extent such property is not available for forfeiture, a sum of money equal to the total value of the property described in subparagraph (a).

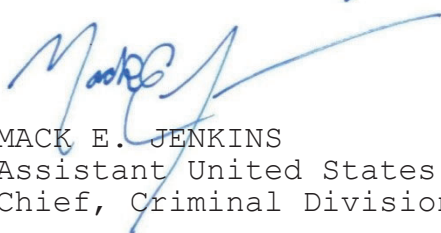
3. Pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c), defendants GOEL and RAHEJA, if so convicted, shall forfeit substitute property, up to the total value of the property described in the preceding paragraph if, as the result of any act or omission of defendants GOEL or RAHEJA, the property described in the preceding paragraph or any portion thereof (a) cannot be located upon the exercise of due diligence; (b) has been transferred, sold to, or deposited with a third party; (c) has been placed beyond the jurisdiction of the court; (d) has been substantially diminished in

1 value; or (e) has been commingled with other property that cannot be
2 divided without difficulty.

3
4
5 A TRUE BILL

6
7 /s/
8 _____
Foreperson

9 E. MARTIN ESTRADA
10 United States Attorney

11 
12 MACK E. JENKINS
13 Assistant United States Attorney
Chief, Criminal Division

14 RANEE A. KATZENSTEN
15 Assistant United States Attorney
Chief, Major Frauds Section

16 SCOTT PAETTY
17 Assistant United States Attorney
Deputy Chief, Major Frauds
18 Section

19 KERRY L. QUINN
20 Assistant United States Attorney
Major Frauds Section