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EASTERN DISTRICT OF CALIFORNIA
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6 Attorneys for Plaintiff
United States of America
7

8 IN THE UNITED STATES DISTRICT COURT
9 EASTERN DISTRICT OF CALIFORNIA
10

11 UNITED STATES OF AMERICA,
12 Plaintiff,
13 v.
14 ABDUL MANNAN,
15 Defendants.
16

CASE NO. **2:15 - CR - 0135 KJM**

18 U.S.C. §§ 2, 1344(2) – Bank Fraud and Attempted
Bank Fraud (4 Counts); 18 U.S.C. §§ 2, 1028A(a)(1)
– Aggravated Identity Theft; 18 U.S.C. §
982(a)(2)(A) and (a)(2)(B) – Criminal Forfeiture

17 INDICTMENT

18 COUNTS ONE THROUGH FOUR: [18 U.S.C. § 1344(2) – Bank Fraud and Attempted Bank Fraud]

19 The Grand Jury charges: T H A T

20 ABDUL MANNAN,

21 defendant herein, between on or about March 5, 2014 and continuing through on or about June 30, 2015,
22 in the County of Sacramento, State and Eastern District of California, and elsewhere, with others known
23 and unknown to the Grand Jury, did knowingly execute and attempt to execute a material scheme and
24 artifice to obtain money, funds, credits, assets, and other property owned by, and under the custody and
25 control of, Capital One Bank, then a federally insured financial institution, by means of materially false
26 and fraudulent pretenses, representations, and promises.

27 In executing the scheme to defraud, defendant Mannan, working with others, knowingly
28 obtained personal financial and identity information of others, used such information to open lines of

1 credit, caused access devices to be issued on the lines of credit and on other already existing lines of
 2 credit, and caused the access devices to be mailed to addresses under defendant Mannan's control.
 3 Defendant Mannan thereafter used the lines of credit and access devices to obtain cash, goods, and
 4 services, and attempted to obtain such, at the expense of Capital One Bank, as follows:

| Count | Date | Victim Financial Institution | Assigned Account Holder | Amount |
|-------|------------|------------------------------|-------------------------|------------|
| 1 | 11/02/2014 | Capital One Bank | S. L. | \$1,301.76 |
| 2 | 11/05/2014 | Capital One Bank | D. A. | \$18.82 |
| 3 | 11/05/2014 | Capital One Bank | D. A. | \$192.10 |
| 4 | 11/07/2014 | Capital One Bank | D. A. | \$140.27 |

11 Each in violation of Title 18, United States Code, Sections 2 and 1344(2).

12 COUNT FIVE: [18 U.S.C. § 1028A(a)(1) - Aggravated Identity Theft]

13 The Grand Jury further charges: T H A T

14 ABDUL MANNAN,

15 defendant herein, beginning on or about November 5, 2014 and continuing to on or about November 7,
 16 2014, in the State and Eastern District of California, did knowingly possess and use, without lawful
 17 authority, a means of identification of another person, that is, victim D. A.'s true name, social security
 18 number, and date of birth, to open a line of credit at Capital One Bank, and to cause an access device for
 19 the line of credit to be mailed to defendant Mannan's Sacramento County residence. Thereafter,
 20 defendant Mannan posed as victim D. A. in Sacramento County by using his name and signature to use
 21 the line of credit for cash, goods, and services during and in relation to a felony violation of Federal law
 22 pursuant to Chapter 63 of Title 18, United States Code, to wit, bank fraud and attempted bank fraud in
 23 violation of 18 U.S.C. § 1344(2), as alleged in Counts 2 and 3, incorporated herein by reference, all in
 24 violation of Title 18, United States Code, Section 1028A(a)(1).

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1 FORFEITURE ALLEGATION: [18 U.S.C. § 982(a)(2)(A) and (a)(2)(B) – Criminal Forfeiture]

2 1. Upon conviction of one or more of the offenses alleged in Counts One through Four of
3 this Indictment, defendant ABDUL MANNAN shall forfeit to the United States, pursuant to 18 U.S.C.
4 §§ 982(a)(2)(A) and (a)(2)(B), any property constituting or derived from proceeds obtained directly or
5 indirectly, as a result of said violations, including but not limited to the following:

6 a) A sum of money equal to the amount of proceeds obtained directly or indirectly,
7 as a result of such offenses, for which defendant is convicted.

8 2. If any property subject to forfeiture as a result of the offenses alleged in Counts One
9 through Four of this Indictment, for which defendant is convicted:

- 10 a. cannot be located upon the exercise of due diligence;
11 b. has been transferred or sold to, or deposited with, a third party;
12 c. has been placed beyond the jurisdiction of the court;
13 d. has been substantially diminished in value; or
14 e. has been commingled with other property which cannot be divided without
15 difficulty;

16 it is the intent of the United States, pursuant to 18 U.S.C. §§ 982(b)(1), incorporating 21 U.S.C. §
17 853(p), to seek forfeiture of any other property of said defendant, up to the value of the property subject
18 to forfeiture.

19
20 A TRUE BILL.

21
22 **/s/ Signature on file w/AUSA**

23 FOREPERSON

24 
25 BENJAMIN B. WAGNER
United States Attorney

No. 2:15 - CR - 0135 KJM

UNITED STATES DISTRICT COURT

Eastern District of California

Criminal Division

THE UNITED STATES OF AMERICA

vs.

ABDUL MANNAN

INDICTMENT

VIOLATION(S):

18 U.S.C. §§ 2, 1344(2) – Bank Fraud and Attempted Bank Fraud (4 Counts);
18 U.S.C. §§ 2, 1028A(a)(1) – Aggravated Identity Theft;
18 U.S.C. § 982(a)(2)(A) and (a)(2)(B) – Criminal Forfeiture

A true bill,

/s/ Signature on file w/AUSA

Foreman.

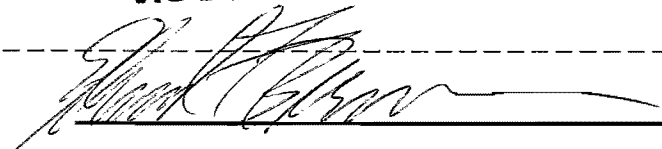
Filed in open court this 15 day

of July, A.D. 20 15

Clerk.

Bail, \$ -----

NO PROCESS NECESSARY



United States v. ABDUL MANNAN
Penalties for Indictment

Defendants
ABDUL MANNAN

COUNT 1-4:

VIOLATION: 18 U.S.C. § 1344(2) – Bank Fraud and Attempted Bank Fraud

PENALTIES: Not more than 30 years imprisonment; or
Fine of up to \$1,000,000; or both fine and imprisonment
Supervised release of at least 5 years

SPECIAL ASSESSMENT: \$100 (mandatory on each count)

COUNT 5:

VIOLATION: 18 U.S.C. § 1028A(a)(1) - Aggravated Identity Theft

PENALTIES: Not more than 2 years imprisonment; or
Fine of up to \$250,000; or both fine and imprisonment
Supervised release of at least 5 years

SPECIAL ASSESSMENT: \$100 (mandatory on each count)

FORFEITURE ALLEGATION:

VIOLATION: 18 U.S.C. § 982(a)(2)(A) and (a)(2)(B), 18 U.S.C. § 1029(c)(1)(C), 18
U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c)

PENALTIES: As stated in the charging document