

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION

UNITED STATES OF AMERICA

v.

CASE NO. 8:26-cr-310-MSS-0PT

KRISTOPHER LUNSFORD

18 U.S.C. § 1343
(Wire Fraud)
18 U.S.C. § 1957
(Illegal Monetary Transactions)

INDICTMENT

The Grand Jury charges:

COUNTS ONE THROUGH SIX
(Wire Fraud)

A. Introduction

At times relevant to this Indictment:

1. Defendant KRISTOPHER LUNSFORD resided in Georgia.

LUNSFORD maintained multiple personal financial accounts, including an account ending in -2709 at Financial Institution #1 ("FI-1") and an account ending in -9440 at Financial Institution #2 ("FI-2").

2. AKL Transport LLC ("AKL Transport") was a Georgia company that LUNSFORD owned and operated. AKL Transport maintained financial accounts ending in -2776 at FI-1 and -2120 at Financial Institution #3 ("FI-3"). LUNSFORD was the sole signer on AKL Transport's accounts.

3. AKL & Associates Inc. ("AKL & Associates") was a Georgia company that LUNSFORD owned and operated. AKL & Associates maintained financial accounts ending in -7603 at FI-1 and -9432 at FI-2. LUNSFORD was the sole signer on AKL & Associates' accounts.

4. Southern Truck Leasing LLC ("STL") was a Georgia company that LUNSFORD owned and operated. STL maintained a financial account ending in -8866 at FI-1. LUNSFORD was the sole signer on STL's account.

5. Southeast TT Rentals LLC ("TT Rentals") was a Georgia company that LUNSFORD owned and operated. TT Rentals maintained a financial account ending in -9461 at FI-1. LUNSFORD was the sole signer on TT Rentals' account.

6. FI-1, FI-2, and FI-3 were headquartered and maintained computer servers used for processing financial transactions, including wire transfers, outside of Florida.

7. The term "semi-truck business" refers to the selling, leasing, and operation of semi-trucks for transportation services, to include transportation of freight and commercial goods.

8. A "Ponzi scheme" was a fraudulent investment operation in which the operator pays existing investors with funds collected from new investors rather than legitimate profits, thus creating the illusion that the fraudulent scheme is a successful, profit-generating business.

9. LUNSFORD operated a Ponzi scheme in which he and others solicited hundreds of victim-investors to invest over \$105 million in his purported semi-truck

business through materially false and fraudulent pretenses, representations, and promises. LUNSFORD used approximately \$75 million of those funds to pay back earlier investors and used over \$25 million of those funds for his personal enrichment, to include purchasing real estate, sports cars, jewelry, luxury brand items, private charters, and expenditures at resorts, casinos, and nightclubs. LUNSFORD used only approximately \$2 million of victim-investors' funds on business-related expenses and operations.

B. The Scheme and Artifice

4. Beginning on an unknown date, but no later than in or around December 2023, and continuing through at least in or around May 2025, in the Middle District of Florida and elsewhere, the defendant,

KRISTOPHER LUNSFORD,

did knowingly and intentionally devise and intend to devise a scheme and artifice to defraud, and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises about a material fact.

C. The Manner and Means of the Scheme and Artifice

4. The manner and means by which LUNSFORD sought to accomplish the scheme and artifice included, among others, the following:

a. It was part of the scheme and artifice that LUNSFORD would and did fraudulently represent himself as a successful entrepreneur in the semi-truck business;

b. It was further part of the scheme and artifice that LUNSFORD and others would and did solicit victim-investors by representing that they could invest in LUNSFORD's semi-truck business to earn passive income;

c. It was further part of the scheme and artifice that LUNSFORD and others would and did falsely and fraudulently represent that LUNSFORD and others handled all aspects of the semi-truck business, including purchasing semi-trucks, hiring drivers, insuring the semi-trucks, and employing the semi-trucks;

d. It was further part of the scheme and artifice that LUNSFORD and others would and did represent to victim-investors that the victim-investors could invest in LUNSFORD's semi-truck business by purchasing a lease for a semi-truck, typically in an amount between approximately \$25,000 and \$40,000, and earn a guaranteed weekly payout, typically in an amount between approximately \$1,000 and \$1,250, while performing no work for the business;

e. It was further part of the scheme and artifice that LUNSFORD and others would and did falsely and fraudulently represent to victim-investors that there was no risk involved with their investments;

f. It was further part of the scheme and artifice that LUNSFORD and others would and did falsely and fraudulently represent to victim-investors that profits from LUNSFORD's semi-truck business were generated from LUNSFORD's operation and employment of the semi-trucks that victim-investors leased;

g. It was further part of the scheme and artifice that LUNSFORD and others would and did encourage victim-investors to create limited liability companies ("LLCs") for their investments with LUNSFORD;

h. It was further part of the scheme and artifice that LUNSFORD and others would and did memorialize the fraudulent investments in documents, including so-called "Lease Agreements," "Trucking Services Agreements," and "Participant Agreements;"

i. It was further part of the scheme and artifice that LUNSFORD and others would and did instruct and cause victim-investors to transmit their investment funds, often via interstate wires, to financial accounts controlled by LUNSFORD and others;

j. It was further part of the scheme and artifice that LUNSFORD, rather than investing the victim-investor funds as he represented, would and did cause victim-investor funds to be transferred from the accounts to which they were initially wired, into other accounts he controlled, and would and did use said funds to repay other victim-investors and for his personal enrichment;

k. It was further part of the scheme and artifice that LUNSFORD would and did fabricate excuses for his failure to make payments to victim-investors and stopped communicating with victim-investors;

l. It was further part of the scheme and artifice that LUNSFORD would and did transmit, and cause to be transmitted, wire communications in interstate commerce; and

m. It was a further part of the scheme and artifice that LUNSFORD would and did misrepresent, hide, and conceal, and cause to be misrepresented, hidden, and concealed, acts performed in furtherance of the scheme.

D. Execution of the Scheme and Artifice

5. On or about the dates set forth below in each count, in the Middle District of Florida and elsewhere, the defendant,

KRISTOPHER LUNSFORD,

for the purpose of executing the aforesaid scheme and artifice, transmitted and caused to be transmitted by means of wire, radio, and television communication in interstate and foreign commerce, a writing, sign, signal, picture, and sound as described below:

Count	Date	Description of Wire Communication
ONE	October 25, 2024	LUNSFORD caused an interstate wire transfer in the amount of \$35,000 from victim-investor J.S.'s business account ending in -0314 within the Middle District of Florida to AKL Transport's account ending in -2776 at FI-1.
TWO	January 17, 2025	LUNSFORD caused an interstate wire transfer in the amount of \$35,000 from victim-investor J.S.'s business account ending in -2637 within the Middle District of Florida to AKL Transport's account ending in -2120 at FI-3.
THREE	January 22, 2025	LUNSFORD caused an interstate wire transfer in the amount of \$35,000 from victim-investor C.W.'s business account ending in -0050 within the Middle District of Florida to AKL Transport's account ending in -2120 at FI-3.

FOUR	February 6, 2025	LUNSFORD caused an interstate wire transfer in the amount of \$40,000 from victim-investor M.G.'s business account ending in -2186 within the Middle District of Florida to AKL Transport's account ending in -2776 at FI-1.
FIVE	February 6, 2025	LUNSFORD caused an interstate wire transfer in the amount of \$40,000 from victim-investor R.G.'s business account ending in -2372 within the Middle District of Florida to AKL Transport's account ending in -2776 at FI-1.
SIX	February 12, 2025	LUNSFORD caused an interstate wire transfer in the amount of \$128,000 from victim-investor E.C.'s business account ending in -9925 within the Middle District of Florida to AKL Transport's account ending in -2776 at FI-1.

In violation of 18 U.S.C. § 1343.

COUNTS SEVEN AND EIGHT
(Illegal Monetary Transactions)

A. Introduction

1. The allegations contained in the Introduction of Counts One through Six of this Indictment are realleged and incorporated by reference as though fully set forth herein.

B. The Charge

2. On or about the dates set forth below in each count, in the Middle District of Florida, and elsewhere, the defendant,

KRISTOPHER LUNSFORD,

did knowingly engage and attempt to engage in the described monetary transaction, affecting interstate and foreign commerce, in criminally derived property of a value greater than \$10,000, such property having been derived from specified unlawful

activity, that is wire fraud, in violation of 18 U.S.C. § 1343, as set forth below:

Count	Date	Description of Wire Communication
SEVEN	October 17, 2024	LUNSFORD caused a payment in the amount of \$115,900 to be made from his personal account ending in -2709 at FI-1 to a jewelry store in the Middle District of Florida.
EIGHT	October 28, 2024	LUNSFORD caused a payment in the amount of \$161,020 to be made from his personal account ending in -2709 at FI-1 to a jewelry store in the Middle District of Florida.

In violation of 18 U.S.C. § 1957.

FORFEITURE

1. The allegations contained in Counts One through Eight are incorporated by reference for the purpose of alleging forfeiture pursuant to 18 U.S.C. §§ 981(a)(1)(C), 982(a)(1), and 28 U.S.C. § 2461(c).

2. Upon conviction of a violation of 18 U.S.C. § 1343, the defendant shall forfeit to the United States, pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the violation.

3. Upon conviction of a violation of 18 U.S.C. § 1957, the defendant shall forfeit to the United States, pursuant to 18 U.S.C. § 982(a)(1), any property, real or personal, involved in such offense, or any property traceable to such property.

4. The property to be forfeited includes, but is not limited to, the following: an order of forfeiture in the amount of at least \$105,940,214.93, which

represents proceeds LUNSFORD obtained from the wire fraud scheme charged in Counts One through Six.

5. If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- 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 divided without difficult;

the United States of America shall be entitled to forfeiture of substitute property

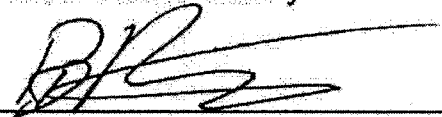
under the provisions of 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. § 982(b)(1) and 28 U.S.C. § 2461(c).

A TRUE BILL,


Foreperson

GREGORY W. KEHOE
United States Attorney

By:


Ross Roberts
Assistant United States Attorney

By:


Michael Kenneth
Assistant United States Attorney
Chief, Economic Crimes Section

No.

UNITED STATES DISTRICT COURT
Middle District of Florida
Tampa Division

THE UNITED STATES OF AMERICA

vs.

KRISTOPHER LUNSFORD

INDICTMENT

Violations: 18 U.S.C. § 1343 (Wire Fraud)
18 U.S.C. § 1957 (Illegal Monetary Transactions)

A true bill,



Foreperson

Filed in open court this 23 day

of September 2026

C. Leavelle

Clerk

Bail \$