

**IN THE UNITED STATES DISTRICT COURT FOR THE  
NORTHERN DISTRICT OF FLORIDA  
PANAMA CITY DIVISION**

**UNITED STATES OF AMERICA**

**CASE No: 5:18cr32-RH**

v.

**KRYSTAL CLOUD**  
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**STATEMENT OF FACTS**

The Defendant admits that, if this case were to proceed to trial, the Government could prove the following facts beyond a reasonable doubt.

Between on or about February 3, 2017, and on or about August 21, 2018, co-defendant Ravi Babu Kolla, an Indian Foreign National (“FN”), operated an immigration marriage fraud business in Bay County, Florida that recruited female United States Citizens (“USCs”) and at least one male USC in the Panama City area to marry Indian FNs to gain immigration benefits. The majority of the Indian FNs overstayed their Visas’ or SEVIS (Student Exchange Visitor Program) requirements and were unlawfully in the United States, but for their fraudulent marriage. The investigation has identified over 80 suspected fraudulent marriages performed in Alabama.

Defendant Krystal Cloud participated with Kolla in the immigration marriage fraud business. On or about October 18, 2017, Cloud entered into a fraudulent marriage with Indian FN groom C.R. in Coffee County, Alabama. Thereafter, she

FILED IN OPEN COURT ON

12/28/18

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conspired to, and did recruit, USCs in the Panama City, Florida, area to marry Indian FNs for Kolla in exchange for \$300 for each USC recruited. Cloud helped arrange marriages between USCs and Indian FNs in Alabama and negotiated for the USCs to be paid \$500.00 per month for approximately two years. Cloud directly recruited or participated in the recruitment of 10 or more USCs from the Panama City area and rural Calhoun and Jackson Counties. She also helped gather personal information from the USCs so that Kolla could create fraudulent I-130, I-864, and G-325A Forms.

Cloud was interviewed on June 24, 2018, and provided a statement regarding her own fraudulent marriage and her recruitment of USC brides. She admitted that she had entered into a fraudulent marriage for the Indian FN groom to gain immigration benefits. Cloud also admitted to recruiting approximately 10 USC brides for Kolla in return for \$300 per recruitment. Cloud was also present and participated in the recruitment of USC groom R.M. Alabama Sheriff's Deputies provided courthouse video for February 12, 2018, which shows Cloud escorting USC bride H.K. and Indian FN groom V.K. into the Coffee County Courthouse in Enterprise, Alabama. Cloud admitted that she accompanied her recruits to the courthouse and wedding ceremonies.

After her interview, a search warrant was executed on Cloud's Facebook Messenger account. The results showed that the day after her interview Cloud

continued to recruit USC brides and participate in fraudulent marriages. There are multiple Facebook Messenger conversations where Cloud discussed recruiting USC brides and the associated finder's fee. Cloud also contacted Kolla to obtain payment.

Cloud was interviewed again on July 13, 2018. Cloud stated that she had met with Kolla but had not participated in any fraudulent weddings and did not know where they occurred. This is contrary to the content from the Facebook search warrant response. Cloud also admitted that she signed the immigration benefit documents for the Indian FN groom she married.

### **ELEMENTS**

#### **Conspiracy:**

- First: That two or more persons, in some way or manner, came to a mutual understanding to try to accomplish a common and unlawful plan, as charged in the indictment;
- Second: That the defendant, knowing the unlawful purpose of the plan, willfully joined it;
- Third: That one of the conspirators during the existence of the conspiracy knowing committed at least one of the methods or "overt acts" described in the indictment; and
- Fourth: That such "overt act" was knowing committed at or about the time alleged in an effort to carry out or accomplish some object the conspiracy.

#### **Marriage Fraud:**

- First: That the defendant knowingly married a United States citizen; and

Second: That she knowingly entered into the marriage for the purpose of evading a provision of the United States immigration laws.

**False Statement in Immigration Document § 1546(a)**

First: The Defendant made the statement in an application or an affidavit or other document required by the immigration laws or regulations prescribed thereunder, as charged;

Second: The statement or document was false;

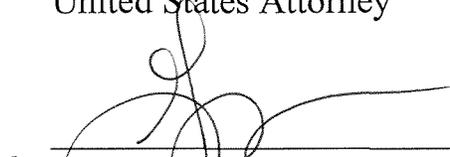
Third: The falsity concerned a material matter;

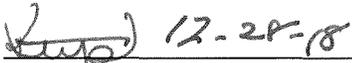
Fourth: The statement was made under oath or as permitted under penalty of perjury under section 1746 of title 28, United States Code], as charged; and

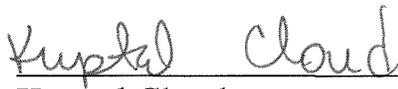
Fifth: Defendant acted knowing that the statement or document was false.

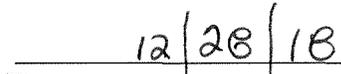
CHRISTOPHER P. CANOVA  
United States Attorney

  
\_\_\_\_\_  
Timothy C. Halstrom  
Assistant Federal Public Defender  
Attorney for Defendant

  
\_\_\_\_\_  
for Corey J. Smith  
Florida Bar No. 0120420  
Assistant United States Attorney  
Northern District of Florida  
111 North Adams Street, 4th Floor  
Tallahassee, FL 32301  
850-942-8430  
c.j.smith@usdoj.gov

  
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Date

  
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Krystal Cloud  
Defendant

  
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Date

  
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