

**FILED**

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WILLIAM T. WALSH  
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2020R01386/APT

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA	:	Hon. (KSH)
	:	
v.	:	Crim. No. 22-754
	:	
GAGAN LAMBA,	:	18 U.S.C. § 1349
JAYANT BHATIA,	:	18 U.S.C. § 1343
VIKASH GUPTA,	:	18 U.S.C. § 371
HARSHAD MADAAAN, and	:	18 U.S.C. § 1030(a)(5)(A)
KULWINDER SINGH	:	18 U.S.C. § 1956(h)
	:	18 U.S.C. § 1956(a)(1)(B)(i)
	:	18 U.S.C. § 1957(a)
	:	18 U.S.C. § 2

**INDICTMENT**

The Grand Jury in and for the District of New Jersey, sitting in Newark,  
charges:

**COUNT ONE**

(Conspiracy to Commit Wire Fraud)

**Overview**

1. From at least as early as in or around 2012 through in or around November 2022, defendants GAGAN LAMBA (“LAMBA”), JAYANT BHATIA (“BHATIA”), VIKASH GUPTA (“GUPTA”), HARSHAD MADAAAN (“MADAAAN”), KULWINDER SINGH (“SINGH”), and others known and unknown, were members of a criminal fraud ring (the “Fraud Ring”) that operated a technical support fraud scheme (the “Tech Support Scheme”) in the United States, the Republic of India, and Canada. The Defendants’ Tech Support Scheme targeted victims across the United States and Canada, including in the District

of New Jersey, many of whom were elderly. The primary objective of the Tech Support Scheme was to trick victims into believing that their personal computers were infected with a virus or malware, and then convince the victims to pay hundreds or thousands of dollars to the Fraud Ring for phony computer repair services. Over the course of the Tech Support Scheme, the Fraud Ring caused more than 20,000 victims to pay more than \$10 million to the Fraud Ring.

**Individuals and Entities**

2. At various times relevant to this Indictment:
  - a. LAMBA, GUPTA, and MADAAAN were citizens of, and resided in, the Republic of India.
  - b. LAMBA was the owner of an India-based company called PC Support and Care (“PSC”) and controlled a bank account ending in 4471 held by PSC at Indusind Bank, LTD in New Delhi, India (the “PSC Bank Account”).
  - c. BHATIA was a citizen of the Republic of India and resided in Ontario, Canada.
  - d. BHATIA was the director of A2Z Consultants Group, Inc. (“A2Z”), a Canadian corporation, and maintained bank accounts under the name “A2Z Consultants Group, Inc.” at Bank A and at least two Canadian financial institutions.
  - e. SINGH was a citizen of the Republic of India and resided in New Jersey.

f. SINGH was manager of Webfixers LLC (“Webfixers”), a New Jersey company, and maintained bank accounts under the name “Webfixers LLC” at Banks A, B, D, E, F, and G.

g. SINGH and MADAAN were the managers of Webmasters LLC (“Webmasters”), a New Jersey company, and SINGH maintained bank accounts under the name “Webmasters LLC” at Bank A.

h. SINGH was the registered agent and manager of Webstylers LLC (“Webstylers”), a New Jersey company, and maintained bank accounts under the name “Webstylers LLC” at Banks F and G.

i. SINGH was the manager of Dialer Tell LLC (“Dialer Tell”), a New Jersey company, and maintained bank accounts under the name “Dialer Tell LLC” at Banks F and H.

j. Co-Conspirator-1 (“CC-1”) resided in New Jersey.

k. CC-1 was the registered agent and director of Web Leaders, Inc. (“Web Leaders”), a New Jersey corporation, and maintained bank accounts under the name “Web Leaders, Inc.” at Banks A, C, E, and G.

l. CC-1 was the registered agent and manager of Quick Fix Computer Services LLC (“Quick Fix”), a New Jersey company, and maintained bank accounts under the name “Quick Fix Computer Services LLC” at Banks C and D.

m. Webfixers, Webmasters, Webstylers, Dialer Tell, Web Leaders, Quick Fix, and A2Z (collectively, the “Fraud Entities”) were “shell”

companies, lacking any actual economic function or business operation, and were established by the Fraud Ring to further the Tech Support Scheme.

n. Company-1 and Company-2 provided business incorporation services used by the Fraud Ring to register the Fraud Entities and to obtain employer identification numbers (“EIN”) for the Fraud Entities from the Internal Revenue Service.

o. A “remote desktop application” was a program or computer operating system that allowed a user to connect to a computer in another location via the internet, see the computer’s desktop, and interact with the computer as if the user was sitting in front of it.

p. Company-3 was a Virginia-based company that provided remote desktop application services used by the Fraud Ring to accomplish the Tech Support Scheme.

q. “Voice over internet protocol” or “VoIP” was a type of digital technology that transmitted voice-based phone calls over an internet connection, rather than a hard-wired line or cellular voice connection.

r. Company-4, Company-5, and Company-6 provided VoIP services used by the Fraud Ring to carry out the Tech Support Scheme.

s. Company-7 and Company-8 were headquartered in Arizona and provided domain registration and web hosting services used by the Fraud Ring to carry out the Tech Support Scheme.

t. Victims-1 through -10 were residents of New Jersey.

u. Banks A through H were financial institutions as defined in Title 18, United States Code, Section 1956(c)(7), and Title 31, United States Code, Section 5312.

**The Conspiracy**

2. From in or around 2012 through in or around November 2022, in the District of New Jersey, and elsewhere, the defendants,

GAGAN LAMBA,  
JAYANT BHATIA,  
VIKASH GUPTA, and  
HARSHAD MADAAN,

did knowingly and intentionally conspire with each other and others to devise and intend to devise a scheme and artifice to defraud individuals, and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, and, for the purpose of executing and attempting to execute such scheme and artifice to defraud, did transmit and cause to be transmitted by means of wire communications in interstate and foreign commerce, certain writings, signs, signals, pictures, and sounds, contrary to Title 18, United States Code, Section 1343.

**Goal of the Conspiracy**

3. The goal of the conspiracy was for members of the Fraud Ring to enrich themselves through the operation of the Tech Support Scheme.

**Manner and Means of the Conspiracy**

4. It was part of the conspiracy that:

a. The Fraud Ring caused pop-up windows to appear on victims' personal computers (the "Fraudulent Pop-Ups"). The Fraudulent Pop-Ups were designed, at times, to "freeze" the victims' computers, which prevented the victims from using or accessing files on their computers.

b. The Fraudulent Pop-Ups claimed, falsely, that the victims' computers were infected with a virus, or otherwise compromised, and directed the victims to call a certain telephone number to receive technical support. In some instances, the Fraudulent Pop-Ups warned victims to not shut down their computers. In other instances, to give the false appearance of legitimacy, the Fraudulent Pop-Ups included, without authorization, the names of well known, legitimate technology and antivirus companies. In reality, the Fraudulent Pop-Ups were a hoax, designed to trick the victims into believing that their computers were infected with viruses that did not actually exist.

c. Victims who called the technical support phone numbers appearing on the Fraudulent Pop-Ups, including Victims-1 through -10, were connected to one or more call centers associated with the Fraud Ring located in the Republic of India. Fraud Ring members at the call centers falsely repeated that the victims' computers were infected with viruses and offered to fix the purported issue for a fee. Fraud Ring members would then request permission to access the victims' computers using a remote desktop application. Once granted access, Fraud Ring members would, at times, download and run a freely available adblocker tool, advise the victim that the "issue" had been resolved, and then leave a text file on the desktop of the computer with the

name of the Fraud Entity used to defraud the victim along with payment instructions.

d. At times, Fraud Ring members would require victims to electronically sign a service agreement between the victim and the Fraud Entity in which the victim authorized the Fraud Ring to debit their checking account for a specific amount ranging from hundreds to thousands of dollars. The service agreement warned that the payment was “non-refundable” and required the victim to state that “the job had been done up to level of satisfaction.”

e. Victims were instructed by members of the Fraud Ring to pay the Fraud Entity in amounts ranging from hundreds to thousands of dollars by: (a) electronically scanning checks made payable to the Fraud Entity, which would be deposited into a bank account controlled by a member of the Fraud Ring using an electronic check deposit service; (b) sending, via FedEx, physical checks to addresses maintained by SINGH, CC-1, and others in New Jersey; or (c) electronically sending payment via an online payment processor to accounts controlled by members of the Fraud Ring, including CC-1.

f. The Fraud Ring designed and registered websites for the Fraud Entities that made it appear as if the Fraud Entities were legitimate tech support companies offering actual services to the public.

g. The Fraud Ring re-contacted certain victims to offer additional services or lengthier service agreements that required victims to pay even more money to the Fraud Ring.

h. The Fraud Ring caused more than 20,000 victims to pay more than \$10 million to the Fraud Ring over the course of the Tech Support Scheme.

All in violation of Title 18, United States Code, Section 1349 and Section 2.

**COUNTS TWO THROUGH SIX**  
(Wire Fraud)

1. The allegations in paragraphs 1, 3, and 4 of Count One of this Indictment are re-alleged here.

2. On or about the dates set forth below, in the District of New Jersey, and elsewhere, the defendants,

GAGAN LAMBA,  
JAYANT BHATIA,  
VIKASH GUPTA, and  
HARSHAD MADAAN,

did knowingly and intentionally devise and intend to devise a scheme and artifice to defraud and to obtain money and property by means of materially false and fraudulent pretenses, representations and promises, and, for purposes of executing and attempting to execute such scheme and artifice to defraud, did knowingly transmit and cause to be transmitted by means of wire communications in interstate and foreign commerce certain writings, signs, signals, pictures, and sounds, as set forth more fully below, each such wire transmission constituting a separate count of this Indictment:

<b>Count</b>	<b>Date</b>	<b>Description</b>
Count 2	January 29, 2021	A member of the Fraud Ring, under false pretenses, remotely connected to Victim-1's personal computer, located in New Jersey.
Count 3	March 1, 2021	A member of the Fraud Ring, under false pretenses, remotely connected to Victim-2's personal computer, located in New Jersey.
Count 4	August 24, 2021	A member of the Fraud Ring, under false pretenses, remotely connected to Victim-3's personal computer, located in New Jersey.

Count 5	November 8, 2021	A member of the Fraud Ring, under false pretenses, remotely connected to Victim-4's personal computer, located in New Jersey.
Count 6	February 3, 2022	A member of the Fraud Ring, under false pretenses, remotely connected to Victim-5's personal computer, located in New Jersey.

In violation of Title 18, United States Code, Section 1343 and Section 2.

**COUNT SEVEN**

(Conspiracy to Commit Computer Fraud and Abuse)

1. The allegations in paragraphs 1, 3, and 4 of Count One of this Indictment are re-alleged here.

**The Conspiracy**

2. From in or around 2012 through in or around November 2022, in the District of New Jersey, and elsewhere, the defendants,

GAGAN LAMBA,  
JAYANT BHATIA,  
VIKASH GUPTA, and  
HARSHAD MADAN,

did knowingly and intentionally conspire and agree with each other and others to commit computer fraud and abuse, namely, to knowingly cause the transmission of a program, information, code, and command, and as a result of such conduct, intentionally cause damage without authorization to a protected computer, and caused loss to one or more persons during a one-year period affecting one or more protected computers aggregating at least \$5,000 in value; to wit, the defendants and their co-conspirators caused pop-up windows to appear on victims' computers, thus preventing the victims from accessing their data, files, and information and impairing the availability of their data, contrary to Title 18, United States Code, Sections 1030(a)(5)(A), 1030(c)(4)(A)(i)(I), and (c)(4)(B)(i).

**The Goal of the Conspiracy**

3. The goal of the conspiracy was for members of the Fraud Ring to enrich themselves through the operation of the Tech Support Scheme.

**Manner and Means of the Conspiracy**

4. It was part of the conspiracy that the Defendants and others engaged in a number of manner and means, including those described in paragraphs 4(a) to 4(h) of Count One of this Indictment.

**Overt Acts**

5. In furtherance of the conspiracy and to affect the object of the conspiracy, LAMBA, BHATIA, GUPTA, MADAN, and others committed the following overt acts, in the District of New Jersey, and elsewhere:

a. On or about October 8, 2014, LAMBA sent a Google chat message to a member of the Fraud Ring requesting the creation of a Fraudulent Pop-Up with the text “Your PC might be infected with viruses and infections. You can call on Customer Care [telephone number] and get it fixed.”

b. On or about November 25, 2014, LAMBA sent a Google chat message to a Fraud Ring member regarding a Fraudulent Pop-Up message and instructed that the “[customer] should not be able to close it.”

c. On or about May 17, 2018, a Fraud Ring member sent a Google Chat message to LAMBA stating, “our popup is ready...and cant be close by any means.”

d. On or about May 17, 2018, LAMBA sent a Google Chat message to a Fraud Ring member and instructed the Fraud Ring member to check that a certain Fraudulent Pop-Up worked “in all browsers.”

e. On or about June 25, 2019, CC-1 sent an email to LAMBA with the subject line “june checks,” which attached several checks received from victims of the Tech Support Scheme.

f. On or about June 25, 2019, LAMBA forwarded to BHATIA the email referenced in paragraph 5(e) of Count Seven of this Indictment.

g. On or about February 3, 2020, GUPTA sent an email to LAMBA and BHATIA and attached an excel document titled “attendance sheet,” which pertained to the attendance of employees at one of the call centers used by the Fraud Ring during the Tech Support Scheme.

h. On or about April 29, 2020, GUPTA sent an email to LAMBA regarding a quote received from Company-6, whose services were used by the Fraud Ring to carry out the Tech Support Scheme.

i. On or about May 16, 2020, BHATIA sent an email to LAMBA, MADAN, and SINGH and attached several service agreements executed between Webfixers and victims of the Tech Support Scheme.

j. On or about August 4, 2020, LAMBA sent an email to BHATIA with the subject line “[Company-3] Details” and provided username and password information for an account held at Company-3, which was used by the Fraud Ring to gain remote access to computers of victims of the Tech Support Scheme.

k. On or about August 5, 2020, MADAN sent an email to LAMBA with the subject line “All Banks Login,” which including username and password information for bank accounts associated with Webfixers and

Weblinkers used by the Fraud Ring to receive fraud proceeds from victims of the Tech Support Scheme.

1. On or about September 30, 2020, LAMBA sent an email to BHATIA with the subject line “Quickfixnj [Company-7]” and provided username and password information for an account held at Company-7, which was used by the Fraud Ring to register internet domains associated with one or more of the Fraud Entities.

m. On or about October 21, 2020, LAMBA sent an email to BHATIA with the subject line “New Domains” and provided username and password information for an account held at Company-8, which was used by the Fraud Ring to register domains associated with Webfixers, Webleaders, and Weblinkers.

n. On or about January 29, 2021, the Fraud Ring caused a pop-up window to appear on Victim-1’s computer, which was located in New Jersey.

o. On or about March 1, 2021, the Fraud Ring caused a pop-up window to appear on Victim-2’s computer, which was located in New Jersey.

p. On or about May 6, 2021, BHATIA sent an email to LAMBA with the subject line “PW’s,” and provided username and password information for approximately nine bank accounts held at various banks by Webfixers, Weblinkers, A2Z, Webleaders, and Quick Fix, all of which were used by the Fraud Ring to receive fraud proceeds from victims of the Tech Support Scheme.

q. On or about May 19, 2021, BHATIA sent an email to LAMBA with the subject line "Login," and provided username and password information for accounts held at various companies whose services were used by the Fraud Ring to carry out the Tech Support Scheme.

r. On or about August 24, 2021, the Fraud Ring caused a pop-up window to appear on Victim-3's computer, which was located in New Jersey.

s. On or about November 8, 2021, the Fraud Ring caused a pop-up window to appear on Victim-4's computer, which was located in New Jersey.

t. On or about February 3, 2022, the Fraud Ring caused a pop-up window to appear on Victim-5's computer, which was located in New Jersey.

All in violation of Title 18, United States Code, Section 371 and Section 2.

**COUNTS EIGHT THROUGH TWELVE**  
(Computer Fraud and Abuse)

1. The allegations in paragraphs 1, 3, and 4 of Count One of this Indictment are re-alleged here.

2. On or about the dates below, in the District of New Jersey, and elsewhere, the defendants,

GAGAN LAMBA,  
JAYANT BHATIA,  
VIKASH GUPTA, and  
HARSHAD MADAAN,

did knowingly cause the transmission of a program, information, code, and command, and as a result of such conduct, intentionally caused damage without authorization to a protected computer, and caused loss to one or more persons during a one-year period affecting one or more protected computers aggregating at least \$5,000 in value; to wit, the defendants and their co-conspirators caused pop-up windows to appear on victims' computers, thus preventing the victims from accessing their data, files, and information and impairing the availability of their data, as set forth more fully below, each such instance constituting a separate count of this Indictment:

<b>Count</b>	<b>Date</b>	<b>Description</b>
Count 8	January 29, 2021	The Fraud Ring caused a pop-up window to appear on Victim 1's personal computer, located in New Jersey.
Count 9	March 1, 2021	The Fraud Ring caused a pop-up window to appear on Victim 2's personal computer, located in New Jersey.
Count 10	August 24, 2021	The Fraud Ring caused a pop-up window to appear on Victim 3's personal computer, located in New Jersey.

Count 11	November 8, 2021	The Fraud Ring caused a pop-up window to appear on Victim 4's personal computer, located in New Jersey.
Count 12	February 3, 2022	The Fraud Ring caused a pop-up window to appear on Victim 5's personal computer, located in New Jersey.

In violation of Title 18, United States Code, Sections 1030(a)(5)(A), 1030(c)(4)(A)(i)(I), 1030(c)(4)(B)(i), and Section 2.

**COUNT THIRTEEN**

(Conspiracy to Commit Money Laundering)

1. The allegations in paragraphs 1, 3, and 4 of Count One of this Indictment are re-alleged here.

**The Conspiracy**

2. From in or around 2012 through in or around November 2022, in the District of New Jersey, and elsewhere, the defendants,

GAGAN LAMBA,  
JAYANT BHATIA,  
HARSHAD MADAAN, and  
KULWINDER SINGH,

did knowingly and intentionally conspire and agree with each other, CC-1, and others to:

- a) knowingly conduct and attempt to conduct financial transactions affecting interstate and foreign commerce, which transactions involved the proceeds of specified unlawful activity, namely, wire fraud, in violation of 18 U.S.C. § 1343 and computer fraud and abuse, in violation of 18 U.S.C. §§ 1030(a)(5)(A), (c)(4)(A)(i)(I), and (c)(4)(B)(i), knowing that the transactions were designed in whole or in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, knowing that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, contrary to Title 18, United States Code, Section 1956(a)(1)(B)(i); and

b) knowingly engage and attempt to engage in monetary transactions by, through, and to a financial institution, in and affecting interstate and foreign commerce, in criminally derived property of a value greater than \$10,000, derived from a specified unlawful activity—that is, wire fraud, in violation of 18 U.S.C. § 1343 and computer fraud and abuse, in violation of 18 U.S.C. §§ 1030(a)(5)(A), (c)(4)(A)(i)(I), and (c)(4)(B)(i)—contrary to 18 U.S.C. § 1957(a).

**Goal of the Conspiracy**

3. The goal of the conspiracy was for LAMBA, BHATIA, MADAAN, SINGH, CC-1, and others to conduct financial transactions involving money obtained from the victims of the Tech Support Scheme alleged in this Indictment, in order to conceal and disguise the nature, location, source, ownership, and control of the money.

**Manner and Means of the Conspiracy**

4. It was part of the conspiracy that:
- a. LAMBA, BHATIA, MADAAN, SINGH, and CC-1 registered, or caused to be registered, the Fraud Entities using the services of Company-1 and Company-2.
  - b. LAMBA, BHATIA, MADAAN, SINGH, and CC-1 established, or caused to be established, numerous bank accounts at Banks A through H in the names of the Fraud Entities (the “Fraud Accounts”).
  - c. LAMBA, BHATIA, and others, through the operation of the Tech Support Scheme, caused victims to send, via FedEx and other means,

physical checks (the “Victim Checks”) to addresses maintained by SINGH and CC-1 in New Jersey, among others.

d. SINGH, CC-1, and others deposited the Victim Checks to one or more of the Fraud Accounts.

e. SINGH, CC-1, and others wired funds out of the Fraud Accounts to India- and Canada-based bank accounts controlled by the Fraud Ring.

In violation of Title 18, United States Code, Section 1956(h) and Section 2.

**COUNTS FOURTEEN THROUGH EIGHTEEN**

(Money Laundering)

1. The allegations in paragraphs 1, 3, and 4 of Count One of this Indictment are re-alleged here.

2. On or about the dates set forth below, in the District of New Jersey and elsewhere, the defendants,

GAGAN LAMBA,  
JAYANT BHATIA,  
HARSHAD MADAAN, and  
KULWINDER SINGH,

did knowingly conduct and attempt to conduct the following financial transactions affecting interstate commerce, which involved the proceeds of specified unlawful activity, that is, wire fraud, in violation of 18 U.S.C. § 1343 and computer fraud and abuse, in violation of 18 U.S.C. §§ 1030(a)(5)(A), (c)(4)(A)(i)(I), and (c)(4)(B)(i), knowing that the transactions were designed in whole and in part to conceal and disguise, the nature, location, source, ownership, and control of the proceeds of the specified unlawful activity and that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, as set forth more fully below, each such transaction constituting a separate count of this Indictment:

<b><u>Count</u></b>	<b><u>Date</u></b>	<b><u>Description</u></b>	<b><u>Victim</u></b>	<b><u>Amount</u></b>
14	September 18, 2019	A check deposited into a Bank-A account ending in 5605 held by SINGH under the name Webmasters LLC	Victim-6	\$549.99
15	October 9, 2019	A check deposited into a Bank-A account ending in 5605 held by SINGH under the name Webmasters LLC	Victim-7	\$299.99

16	January 27, 2020	A check deposited into a Bank-A account ending in 4772 held by SINGH under the name Webmasters LLC	Victim-8	\$349.99
17	February 7, 2020	A check deposited into a Bank-A account ending in 4772 held by SINGH under the name Webmasters LLC	Victim-9	\$449.99
18	April 8, 2020	A check deposited into a Bank-D account ending in 5825 held by SINGH under the name Webfixers LLC	Victim-10	\$299.99

All in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i)  
and Section 2.

**COUNTS NINETEEN THROUGH TWENTY-ONE**

(Engaging in Monetary Transactions in Property  
Derived from Specified Unlawful Activity)

1. The allegations in paragraphs 1, 3, and 4 of Count One of this Indictment are re-alleged here.

2. On or about the dates set forth below, in the District of New Jersey and elsewhere, the defendants,

GAGAN LAMBA,  
JAYANT BHATIA,  
HARSHAD MADAAN, and  
KULWINDER SINGH,

did knowingly engage and attempt to engage in monetary transactions by, through, and to a financial institution, in and affecting interstate and foreign commerce, in criminally derived property of a value greater than \$10,000, derived from a specified unlawful activity—that is, wire fraud, in violation of 18 U.S.C. § 1343 and computer fraud and abuse, in violation of 18 U.S.C. §§ 1030(a)(5)(A), (c)(4)(A)(i)(I), and (c)(4)(B)(i)—as set forth more fully below, each such transaction constituting a separate count of this Indictment:

<b><u>Count</u></b>	<b><u>Date</u></b>	<b><u>Description</u></b>
19	March 16, 2020	Interstate wire transfer of \$60,000 from an account ending in 4772 held by Webmasters LLC at Bank A to the PSC Bank Account.
20	April 9, 2020	Interstate wire transfer of \$15,000 from an account ending in 5825 held by Webfixers LLC at Bank D to the PSC Bank Account.
21	June 17, 2020	Interstate wire transfer of \$20,000 from an account ending in 2382 held by Webfixers LLC at Bank B to the PSC Bank Account.

All in violation of Title 18, United States Code, Section 1957(a) and Section 2.

**FORFEITURE ALLEGATION AS TO COUNTS ONE THROUGH TWELVE**

1. As a result of committing the offenses constituting specified unlawful activity as defined in 18 U.S.C. § 1956(c)(7), as alleged in Counts One through Twelve of this Indictment, the defendants,

GAGAN LAMBA,  
JAYANT BHATIA,  
HARSHAD MADAAN, and  
VIKASH GUPTA,

shall forfeit to the United States, pursuant to 18 U.S.C. § 981(a)(1)(C), and 28 U.S.C. § 2461(c), all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of the offenses charged in Counts One through Twelve, and all property traceable thereto.

**FORFEITURE ALLEGATION AS TO COUNTS THIRTEEN THROUGH TWENTY-ONE**

2. As a result of committing the money laundering offenses charged in Counts Thirteen through Twenty-One of this Indictment, the defendants,

GAGAN LAMBA,  
JAYANT BHATIA,  
HARSHAD MADAAN, and  
KULWINDER SINGH,

shall forfeit to the United States, pursuant to 18 U.S.C. § 982(a)(1), all property, real or personal, involved in such money laundering offenses, and all property traceable to such property.

**Substitute Assets Provision**  
**(Applicable to All Forfeiture Allegations)**

3. If any of the above-described forfeitable property, as a result of any act or omission of the defendants:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third person;
- (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 subdivided without difficulty,

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), as incorporated by 28 U.S.C. § 2461(c), to seek forfeiture of any other property of the defendant up to the value of the above-described forfeitable property.

A True Bill,



Foreperson

*Philip R. Sellinger*

PHILIP R. SELLINGER

United States Attorney

PageID: 26  
CASE NUMBER: 22-754(KSH)

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**United States District Court  
District of New Jersey**

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**UNITED STATES OF AMERICA**

**v.**

**GAGAN LAMBA,  
JAYANT BHATIA,  
VIKASH GUPTA,  
HARSHAD MADAAN, and  
KULWINDER SINGH**

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**INDICTMENT FOR**

**18 U.S.C. § 1349**

**18 U.S.C. § 1343**

**18 U.S.C. § 371**

**18 U.S.C. § 1030(a)(5)(A)**

**18 U.S.C. § 1956(h)**

**18 U.S.C. § 1956(a)(1)(B)(i)**

**18 U.S.C. § 1957(a)**

**18 U.S.C. § 2**

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**A True Bill,**

  
**Foreperson**

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**PHILIP R. SELLINGER**

*UNITED STATES ATTORNEY*

*NEWARK, NEW JERSEY*

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**ANTHONY P. TORNTORE**  
*ASSISTANT U.S. ATTORNEY*  
973 645 2726

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