

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

UNITED STATES OF AMERICA : Hon.
 :
 :
 v. : Criminal No. 22-
 :
 :
 MEGHNA KUMAR : 18 U.S.C. § 1957
 : 18 U.S.C. § 2

INFORMATION

The defendant having waived in open court prosecution by Indictment, the United States Attorney for the District of New Jersey charges:

Introduction

1. From at least as early as in or around 2012 through in or around November 2022, Defendant MEGHNA KUMAR laundered the proceeds of a technical support fraud scheme (the “Tech Support Scheme”) executed by a criminal fraud ring (the “Fraud Ring”) that operated in the United States, the Republic of India, and Canada. The 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.

Relevant Individuals and Entities

1. At all times relevant to this Information:
 - a. Defendant MEGHNA KUMAR (“KUMAR”) was a resident of New Jersey.
 - b. KUMAR was the registered agent and director of Web Leaders, Inc. (“Web Leaders”), a New Jersey corporation. Web Leaders was a shell company, lacking any actual economic function or business operation, and was established by the Fraud Ring to further the Tech Support Scheme.
 - c. KUMAR maintained a bank account under the name “Web Leaders, Inc.” at Bank A (the “Bank A Web Leaders Account”). The Bank A Web Leaders Account was used by the Fraud Ring to accept funds from victims of the Tech Support Scheme.
 - d. Individual-1 was a member of the Fraud Ring and the owner of an India-based company called PC Support and Care (“PSC”). Individual-1 controlled a bank account ending in 4471 held by PSC at Indusind Bank, LTD in New Delhi, India (the “PSC Bank Account”).
2. On or about July 23, 2020, the defendant,

MEGHNA KUMAR,

did knowingly engage and attempt to engage in a monetary transaction 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, namely, an interstate wire transfer of approximately \$21,000 from the Bank A Web Leaders Account to the PSC Bank Account, such property having been derived from a specified unlawful activity, that is, wire fraud, in violation of

Title 18, United States Code, Section 1343, and computer fraud and abuse, in violation of Title 18, United States Code, Sections 1030(a)(5)(A), (c)(4)(A)(i)(I), and (c)(4)(B)(i).

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

FORFEITURE ALLEGATION

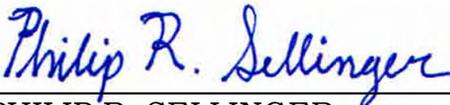
1. As the result of committing the offense in violation of Title 18, United States Code, Section 1957(a) alleged in this Information, the defendant, MEGHNA KUMAR, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(1), all property, real and personal, involved in the money laundering offense, and all property traceable to such property.

SUBSTITUTE ASSETS PROVISION

2. If any of the property described above as being subject to forfeiture, as result of any act or omission of the defendant MEGHNA KUMAR,

- (a) cannot be located upon the exercise of due diligence;
- (b) cannot be located upon the exercise of due diligence;
- (c) has been transferred or sold to, or deposited with, a third party;
- (d) has been placed beyond the jurisdiction of the court;
- (e) has been substantially diminished in value; or
- (f) has been commingled with other property which cannot be divided

it is the intention of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property.



PHILIP R. SELLINGER
United States Attorney