

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF RHODE ISLAND

UNITED STATES OF AMERICA

v.

JACK A. RANALLO  
a/k/a "Giacomo A. Siciliano"

Criminal Case No. 1:24-cr-00088-MSM

Violations:

18 U.S.C. § 1343 - (Wire Fraud)  
18 U.S.C. § 1957 - (Money Laundering)

**INDICTMENT**

The Grand Jury charges that:

**Introduction**

At all times relevant to this Indictment, unless herein stated:

1. Defendant JACK A. RANALLO ("RANALLO") was a resident of the State of Rhode Island and elsewhere.
2. RANALLO held himself out as a software developer and businessman, who owned several companies.
3. R.P. was a resident of Rhode Island, and an investor in RANALLO's business ventures, including purported cyber security company, iGuardian Angel.
4. C.M. was a resident of Rhode Island, and an investor in RANALLO's efforts to develop 1013 Products Group, a liquidated products business.
5. RANALLO maintained bank accounts at Citizens Bank, N.A., including account # xxxx-0177, account # xxxx-6359, and account # xxxxxx-4292.
6. The U.S. Copyright Office is a United States government body that registers copyright claims, records information about copyright ownership, provides

information to the public, and assists Congress and other parts of the government on a wide range of copyright issues.

7. A “copyright” is a type of intellectual property that protects original works of authorship as soon as an author fixes the work in a tangible form of expression. In copyright law, there are a lot of different types of works, including computer programs.

8. “Steve Wozniak” was an American technology entrepreneur and the co-founder of Apple, Inc. with whom RANALLO falsely claimed to have contact.

9. “Larry Ellison” was an American businessman and entrepreneur who co-founded software company Oracle Corporation with whom RANALLO falsely claimed to have contact.

10. “David Tepper” was an American businessman and founder of the hedge fund Appaloosa Management with whom RANALLO falsely claimed to have contact.

11. “Jeff Bezos” was an American businessman and founder of Amazon with whom RANALLO falsely claimed to have contact.

12. “Bill Gates” was an American businessman and co-founder of the software company, Microsoft, with whom RANALLO falsely claimed to have contact.

13. E.K. was a copyright attorney and Of Counsel with the law firm of Sheppard Mullin in Washington, DC, with whom RANALLO falsely claimed to have contact.

14. “Fake Call” was an application for a smart phone that allows the user to simulate a fake incoming call.

15. “Text Message Creator” was an application for a smart phone that allows the user to create a fake text message conversation.

**COUNTS 1 - 8**  
(Wire Fraud)

16. Paragraphs 1-15 of this Indictment are incorporated by reference herein.

**Scheme and Artifice to Defraud**

17. From at least as early as in or about February 2018, and continuing until in or about November 2022, in the District of Rhode Island and elsewhere, RANALLO knowingly devised and intended to devise a scheme and artifice to defraud, and for obtaining money and property from investors R.P. and C.M., by means of false and fraudulent pretenses, representations, and promises.

**Object of the Scheme to Defraud**

18. The object of the scheme to defraud was for RANALLO to defraud and unlawfully obtain funds from R.P. and C.M. (collectively “the investors”) by making false and fraudulent misrepresentations about the existence and characteristics of investment opportunities that RANALLO was supposedly developing, and to spend investors’ funds on personal expenses.

**Manner and Means of the Scheme to Defraud**

19. RANALLO, who also used the alias "Giacomo A. Siciliano," held himself out as a "Master Software Architect" and "Data Scientist."

20. RANALLO falsely claimed to be in the process of developing software programs, including iGuardian 360, a purported cyber security program, and Intelligrid, a program designed to divert power to other power stations to avoid an outage.

21. RANALLO falsely claimed to have a company called iGuardian Angel, which held copyrights on RANALLO's cybersecurity software, when in fact no such company or copyrights existed (hereinafter "the phony copyrights").

22. RANALLO falsely claimed to be in the process of developing a company, 1013 Products Group, to acquire and resell liquidated products.

23. RANALLO and his purported company, iGuardian Angel, assigned a 25% ownership interest in the phony copyrights to R.P. in return for investment funds.

24. RANALLO falsely claimed that famous businessmen were interested in his software programs and that he consulted with businessmen, including those individuals listed in paragraphs 8 - 12 of this Indictment and the copyright attorney identified in paragraph 13 of this Indictment.

25. RANALLO used smartphone applications that made it appear as though he had received phone calls or messages from individuals, including those individuals

listed in paragraphs 8 - 13 of this Indictment, when in fact he had not received such calls or messages. RANALLO showed these fake calls or messages to R.P.

26. RANALLO purchased banks checks that he made payable to "Microsoft," "Oracle," "Robert Walsh," "E.K.," and "Register of Copyrights." RANALLO showed these checks to R.P. and falsely represented that they were associated with their software business. After showing the checks to R.P., RANALLO deposited the checks into his Citizens Bank account # 0177.

27. RANALLO used text message, email, and other forms of electronic communication to communicate with R.P. and R.P.'s family about his purported software programs and his supposed efforts to develop iGuardian and Intelligrid.

28. RANALLO falsely represented that he was developing a liquidated products business to obtain investment money from C.M.

29. RANALLO provided C.M. with a false Promissory Note when he had no intention or ability to repay C.M. for his investment monies.

30. RANALLO used the investment monies that he received from R.P. and C.M. to fund personal expenditures, including the purchase of vehicles, a condominium, and personal items at various retailers.

31. RANALLO lulled R.P. with false promises about the development of his software program and the success of R.P.'s investment with RANALLO.

**Execution of the Scheme to Defraud**

32. On or about the dates set forth below, in the District of Rhode Island, the defendant, JACK A. RANALLO, did knowingly and willfully, for the purpose of executing the scheme and artifice to defraud described above, cause to be transmitted in interstate and foreign commerce the below-described writings, signs, signals and sounds, according to directions thereon:

<b><u>Count</u></b>	<b><u>Date</u></b>	<b><u>Description of Wire</u></b>
1	12/31/20	Text message sent by RANALLO in Rhode Island to R.P. outside of Rhode Island regarding RANALLO's intent to return to R.P. money.
2	2/4/21	Text message sent by RANALLO outside of Rhode Island to R.P. in Rhode Island regarding iGuardian 360.
3	2/4/21	Text messages sent by RANALLO outside of Rhode Island to R.P. in Rhode Island regarding Larry Ellison, one of the famous businessmen who RANALLO claimed was interested in iGuardian 360.
4	2/12/21	Text message sent by RANALLO in Pennsylvania to R.P. in Rhode Island about obtaining a "short term asset based loan" for development of his business ventures.
5	2/13/21	Text message sent by RANALLO in Pennsylvania to R.P. in Rhode Island explaining that their software was advanced.
6	2/22/21	Lulling text message sent by RANALLO in Pennsylvania to R.P. in Rhode Island reassuring R.P. that he will receive a lot of money.
7	3/4/21	Text message sent by RANALLO in Pennsylvania to R.P. in Rhode Island describing their software platform as "revolutionary."

All in violation of 18 U.S.C. § 1343.

**COUNT 8 - 10**  
(Money Laundering)

33. Paragraphs 1 - 32 of this Indictment are incorporated by reference herein.

34. On or about each date listed below, in the District of Rhode Island and elsewhere, the defendant, JACK A. RANALLO, did knowingly engage and attempt to engage in the following monetary transactions by, through, or to a financial institution, affecting interstate or foreign commerce, in criminally derived property of a value greater than \$10,000, such property having been derived from specified unlawful activity - wire fraud, in violation of 18 U.S.C. § 1343, as described below:

<u>Count</u>	<u>Approximate Date</u>	<u>Description of Transaction</u>
8	10/31/19	Issuance of Citizens Bank Check #515770866-9 made payable to "D'Ellena Law Office" in the amount of \$324,552.67 for the purchase of 3800 Post Road, Unit #8, Warwick, RI.
9	1/19/22	Issuance of Citizens Bank Check #517069463-1 made payable to "Vroom" in the amount of \$49,760.49 for the purchase of Jeep Wrangler.
10	2/2/22	Issuance of Citizens Bank Check #517069469-1 made payable to "R.T." in the amount of \$25,000.

All in violation of 18 U.S.C. § 1957.

A TRUE BILL:



Grand Jury Foreperson

ZACHARY A. CUNHA  
United States Attorney

SANDRA R. HEBERT  
Assistant United States Attorney

LEE H. VILKER  
Assistant United States Attorney  
Criminal Division, Chief

Date: 10/23/2024



**DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT**

BY:  INFORMATION  INDICTMENT  COMPLAINT

CASE NO. 1:24-cr-00088-MSM-PAS

Matter Sealed:  Juvenile  Other than Juvenile  
 Pre-Indictment Plea  Superseding  Defendant Added  
 Indictment  Charges/Counts Added  
 Information

USA vs.

Defendant: Jack A. Ranallo a/k/a "Giacomo A. Siciliano"

Name of District Court, and/or Judge/Magistrate Location (City)

UNITED STATES DISTRICT COURT RHODE ISLAND  
 DISTRICT OF RHODE ISLAND Divisional Office

Name and Office of Person Furnishing Information on THIS FORM ZACHARY A. CUNHA  
 U.S. Atty  Other U.S. Agency  
 Phone No. (401) 709-5000

Name of Asst. U.S. Attorney (if assigned) Sandra R. Hebert

Address: [REDACTED]

Interpreter Required Dialect: \_\_\_\_\_

Birth Date [REDACTED]  Male  Alien  
 Female (if applicable)

Social Security Number [REDACTED]

**PROCEEDING**

Name of Complainant Agency, or Person (& Title, if any)  
USPIS ~ Cory McManus, Postal Inspector

person is awaiting trial in another Federal or State Court (give name of court)

this person/proceeding transferred from another district per (circle one) FRCrP 20, 21 or 40. Show District

this is a re prosecution of charges previously dismissed which were dismissed on motion of:  
 U.S. Atty  Defense

this prosecution relates to a pending case involving this same defendant. (Notice of Related Case must still be filed with the Clerk.)

prior proceedings or appearance(s) before U.S. Magistrate Judge regarding this defendant were recorded under

SHOW DOCKET NO.

MAG JUDGE CASE NO.

Place of offense RHODE ISLAND County

**DEFENDANT**

Issue:  Warrant  Summons

Location Status:

Arrest Date 9/21/2023 or Date Transferred to Federal Custody \_\_\_\_\_

Currently in Federal Custody

Currently in State Custody

Writ Required

Currently on bond

Fugitive

Defense Counsel (if any): \_\_\_\_\_

FPD  CJA  RET'D

Appointed on Target Letter

This report amends AO 257 previously submitted

**OFFENSE CHARGED - U.S.C. CITATION - STATUTORY MAXIMUM PENALTIES - ADDITIONAL INFORMATION OR COMMENTS**

Total # of Counts 10

Set	Title & Section/Offense Level (Petty = 1 / Misdemeanor = 3 / Felony = 4)	Description of Offense Charged	Felony/Misd.
1-7	18 USC § 1343	Wire Fraud	<input checked="" type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor
	Imprisonment: 20 yrs/ Fine: \$250,000	Supervised Release: 3 yrs/ Special Assessment: \$100	<input type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor
8-10	18 USC § 1957	Money Laundering	<input checked="" type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor
	Imprisonment: 10 yrs/ Fine: \$250,000	Supervised Release: 3 yrs/ Special Assessment: \$100	<input type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor
		Estimated Trial Days: 5	<input type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor

Submit

Go