

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND

IN RE COMPLAINT

Misc. No. 1:17-MJ-340-PAS

MOTION TO SEAL

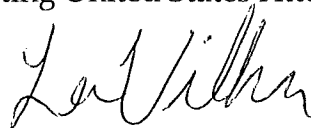
The Government moves that this Motion to Seal and the attached documents (including the Complaint, Arrest Warrant, Cover Sheet, and Affidavit in Support) be sealed until further Order of this Court.

Respectfully submitted,

UNITED STATES OF AMERICA

By its attorneys,

STEPHEN G. DAMBRUCH
Acting United States Attorney



LEE H. VILKER
Assistant U.S. Attorney
U.S. Attorney's Office
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FILED
JUL 17 2017
U.S. DISTRICT COURT
DISTRICT OF RHODE ISLAND

SO ORDERED:



PATRICIA A. SULLIVAN
UNITED STATES MAGISTRATE JUDGE

Dated: July 17, 2017

UNITED STATES DISTRICT COURT

for the
District of Rhode Island

United States of America
v.

Gerald Kent, YOB: 1965
Defendant

)
)
)
)
)

Case No. 1.17MTJ-340PAS

ARREST WARRANT

To: Any authorized law enforcement officer

YOU ARE COMMANDED to arrest and bring before a United States magistrate judge without unnecessary delay
(name of person to be arrested) Gerald Kent, YOB: 1965,
who is accused of an offense or violation based on the following document filed with the court:

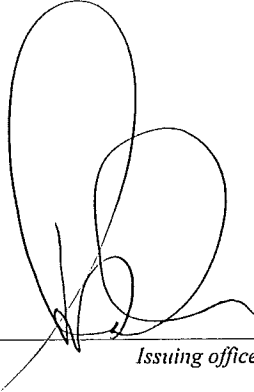
- Indictment Superseding Indictment Information Superseding Information Complaint
- Probation Violation Petition Supervised Release Violation Petition Violation Notice Order of the Court

This offense is briefly described as follows:

- wire fraud, in violation of 18 U.S.C. § 1343; and
- aggravated identity theft, in violation of 18 U.S.C. § 1028A

Date: July 17, 2017

City and state: Providence, Rhode Island



Issuing officer's signature

Patricia A. Sullivan, U.S. Magistrate Judge
Printed name and title

Return

This warrant was received on (date) _____, and the person was arrested on (date) _____
at (city and state) _____.

Date: _____

Arresting officer's signature

Printed name and title

UNITED STATES DISTRICT COURT

for the
District of Rhode Island

United States of America
v.

Gerald Kent, YOB: 1965

Case No.

17 MS-340 PA

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of December, 2014 - February, 2016 in the county of in the
District of Rhode Island, the defendant(s) violated:

Code Section
18 U.S.C. § 1343
18 U.S.C. § 1028A

Offense Description
Wire fraud; and
Aggravated identity theft

This criminal complaint is based on these facts:

See attached Affidavit of Senior Special Agent Brian Sindoni of the United States Secret Service, Department of Homeland Security.

Continued on the attached sheet.

Handwritten signature of Brian Sindoni

Complainant's signature

Senior Special Agent Brian Sindoni - USSS

Printed name and title

Sworn to before me and signed in my presence.

Date:

July 17, 2017

City and state:

Providence, Rhode Island

Handwritten signature of Patricia A. Sullivan

Judge's signature

Patricia A. Sullivan, U.S. Magistrate Judge

Printed name and title

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

BY: INFORMATION INDICTMENT COMPLAINT

CASE NO. _____

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

USA vs.
 Defendant: Gerald Kent

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

Address: 173 Midway Oval
Groton, Connecticut

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

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

Interpreter Required Dialect: _____

Name of Asst. Lee H. Vilker
 U.S. Attorney
 (if assigned)

Birth Date 9/17/1965 Male Alien
 Female (if applicable)

Social Security Number 036-50-4023

PROCEEDING

DEFENDANT

Name of Complainant Agency, or Person (& Title, if any)
Brian Sindoni - Sr. Special Agent of U.S. Secret Service

Issue: Warrant Summons

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

Location Status:
 Arrest Date _____ or Date Transferred to Federal Custody _____

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

Currently in Federal Custody
 Currently in State Custody
 Writ Required
 Currently on bond
 Fugitive

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

SHOW
 DOCKET NO.

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

MAG. JUDGE
 CASE NO.

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

Defense Counsel (if any): _____

FPD CJA RET'D
 Appointed on Target Letter

Place of offense RHODE ISLAND County _____

This report amends AO 257 previously submitted

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

Total # of Counts 2

Set	Title & Section/Offense Level (Petty = 1 / Misdemeanor = 3 / Felony = 4)	Description of Offense Charged	Felony/Misd.
1	18 U.S.C. § 1343	Wire fraud	<input checked="" type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor
2	18 U.S.C. § 1028A	Aggravated identity theft	<input checked="" type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor
			<input type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor
			<input type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor
			<input type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor

AFFIDAVIT

I, Brian Sindoni, being first duly sworn, hereby depose and state as follows:

1. I am a Senior Special Agent of the United States Secret Service, Department of Homeland Security. I have been so employed since September 15, 1995. I received formal training at the Federal Law Enforcement Training Center in Glynco, Georgia, and the United States Secret Service Academy in Beltsville, Maryland. Training included, among other things, the investigation of financial crimes which included the following; identity theft, access device fraud, bank fraud, forgery and counterfeit U.S. currency. During the course of my career with the U.S. Secret Service, I have investigated numerous financial crimes involving fraud and associated financial crimes. I am currently assigned to the Providence Resident Office. My current assignment includes investigating violations of Title 18 United States Code, Sections 1028, 1028A, 1029, 1037, 1341, 1343, 1344, 1349 and 1956. Based on my training and experience, I am familiar with the means by which individuals use computers and information networks to commit various crimes. These include individuals who are engaging in financial and computer crimes.

2. This affidavit is submitted in support of a criminal complaint and arrest warrant for GERALD KENT ("Kent"). As will be shown below, there is probable cause to believe that from December 2014 through February 2016, Kent committed wire fraud and aggravated identity theft, in violation of 18 U.S.C. §§ 1343 and 1028A.

3. The statements in this Affidavit are based upon my personal participation in this investigation, review of various documents, as well as information provided to me by other law enforcement officers, my own training and expertise as a criminal investigator, as well as the training and expertise of other criminal investigators involved with this investigation. I have set

forth the facts that I believe establish probable cause to believe that Kent committed violations of the aforementioned criminal statutes.

4. As set forth below, investigation has revealed that Kent orchestrated a long running scheme to defraud JD Factors, LLC (“JD Factors”) out of more than \$3.6 million by submitting false invoices for factoring. Investigation has revealed that Kent emailed fake invoices and supporting documents to JD Factors. Based on the fake invoices and documents, JD Factors wired payments to bank accounts controlled by Kent. The fraudulent scheme perpetrated by Kent was unusually sophisticated as it involved: (i) the creation of hundreds of fraudulent invoices, (ii) the creation and use of a fraudulent clone Groupon, Inc. (“Groupon”) website, (iii) the enlistment of coconspirators to pose as Groupon employees, and (iv) the opening of bank accounts in the names of Groupon and Zulily, LLC. (“Zulily”) in order to deceive JD Factors into believing it was still receiving some payments from these companies.

Kent Jewelry and JD Factors

5. Kent is the owner and operator of Kent Jewelry, 8 Industrial Lane, Johnston, RI, a wholesale jewelry distributor. According to the Rhode Island Secretary of State Office, Kent Jewelry was incorporated in the State of Rhode Island on March 12, 2013 with Kent listed as the President. Kent Jewelry is largely in the business of selling jewelry over the internet using websites such as Groupon.com and Zulily.com.

6. Since approximately December 2014, Kent Jewelry was engaged in a business relationship with JD Factors, a factoring company based in Chicago, Illinois. Factoring is a financial transaction and a type of debtor finance in which a business sells its accounts receivable (i.e., invoices) to a third party (called a factor) at a discount. JD Factors works with a business to provide working capital in order to grow its business without having to wait for its outstanding

accounts receivables to be paid. Typically, JD Factors immediately pays its customers the vast majority of the amount of the invoices submitted and then proceeds to collect payment from the customer's clients.

Information Provided by JD Factors

7. On March 7, 2017, agents interviewed Roi "Chip" Wiley ("Wiley"), Senior Vice President of JD Factors. Wiley advised that in December 2014, Kent Jewelry was signed as a client by JD Factors. Wiley stated the first receivable/funding with Kent Jewelry began in late December 2014. Kent Jewelry submitted invoices and excel spreadsheets of Sale of Account Receivables to JD Factors via email. JD Factors based the funding back to Kent Jewelry on the submitted invoices. JD Factors was advised by Kent that Kent Jewelry had a contract with Groupon. Kent emailed Wiley with a password and link to a purported Groupon portal for Wiley to review and verify accounts receivables for orders placed by Groupon. Groupon reportedly does not provide remittance and therefore Wiley was only able to review the receivables via the portal to which Kent provided access.

8. Wiley further stated that JD Factors recently learned from Groupon that Groupon terminated its relationship with Kent Jewelry in August 2016 and that all Groupon invoices submitted by Kent Jewelry to JD Factors after that date (totaling more than \$2.7 million) are bogus. Wiley stated that JD Factors has sustained more than \$3.6 million in losses due to fake invoices sent by Kent (mostly from Groupon and Zulily) that were processed for payment by JD Factors.

9. Wiley further stated that he mistakenly believed that the invoices to Groupon were legitimate because some of the invoices were paid by an entity named Groupon Payments. Investigators have learned that Kent opened accounts at TD Bank under the names of "Groupon

Payments” and “Zulily, LLC” and forwarded relatively small payments from those accounts to JD Factors, thereby causing JD Factors to erroneously believe that Groupon and Zulily were making payments on invoices submitted by Kent Jewelry and that the invoices were of genuine sales.

10. Wiley further advised that another customer of Kent Jewelry was Zulily and that JD Factors factored electronic invoices of purported Zulily sales that Kent submitted to JD Factors via email. According to JD Factors’ records, Zulily has not paid approximately \$2,039,656 in invoices that were submitted by Kent to JD Factors. Wiley believes these to have been fraudulent invoices of transactions that never occurred.

11. Wiley further informed investigators that another customer of Kent Jewelry is New York company named Blade Marketing, Inc. Wiley stated that he had recent communications with G.G. of Blade Marketing and identified her as the primary point of contact. Wiley said on or about February 9, 2017, he had a telephonic conversation with G.G. and confirmed an outstanding balance of approximately \$115,000 owed by Blade Marketing to JD Factors. Wiley stated that in a conversation he had with G.G. in the third week of February 2017, G.G. admitted that some of the Blade Marketing invoices from Kent were fraudulent.

Information and Documents Provided by Groupon

12. Groupon officials have advised the undersigned that Groupon terminated its relationship with Kent Jewelry on August 1, 2016 because there were numerous instances in which Kent failed to deliver ordered products to Groupon customers. Groupon advised that it placed no orders whatsoever with Kent Jewelry after August 1, 2016.

13. From August 2, 2016 through December 11, 2016, Kent sent JD Factors at least \$2.7 million worth of invoices for goods it purportedly sold through Groupon. These invoices

were all fraudulent as Groupon made no purchases from Kent Jewelers after August 1, 2016. In all, there were at least 1,005 fraudulent Groupon invoices submitted to JD Factors by Kent. Upon receipt of these fraudulent invoices, JD Factors made payment to Kent.

14. JD Factors has produced to investigators hundreds of invoices to Groupon dated after August 1, 2016 that Kent submitted for payment. Groupon officials have reviewed these invoices and confirmed that each and every one is fraudulent.

Information and Documents Provided by Zulily

15. Zulily officials have advised law enforcement that Zulily has been in a contractual relationship with Kent Jewelry since July 8, 2016 and that it made numerous purchases of jewelry from Kent Jewelry from that time until February 2017. Zulily officials provided law enforcement with copies of all the invoices it received from Kent Jewelry and spreadsheets detailing all the sales made and monies sent by Zulily for purchases made from Kent Jewelry.

16. JD Factors provided law enforcement with dozens of Zulily invoices that it received from Kent and for which it did not receive payment from Zulily. According to JD Factors records, it is owed approximately \$2,039,000 from Zulily in invoices it factored for Kent Jewelers. The Zulily invoices Kent provided to JD Factors were forwarded to Zulily for review. Zulily has determined that 159 of the invoices were fraudulent. These fraudulent invoices total approximately \$2,337,385.

Information Provided by Cooperating Witness

17. In February 2017, a Cooperating Witness¹ ("CW") met with agents. The CW is a contractor in the Informational Technology field. The CW stated he has known Kent for

¹ A criminal history query of CW revealed arrests in 1996 for Fugitive from Justice, Forgery-2 counts, Conspiracy-2 counts (3 Yrs ACI, 3MS TS, 33 MS SS/Probation per CT concurrent), 1995 Suspended License (NOLO, \$250 fine),

approximately 8-9 years. During that time, the CW worked as a computer contractor for Kent. CW was contracted by Kent to set up and maintain computers, printers, email accounts and related computer applications.

18. The CW stated that in or about August 2016, Kent asked him to create a fictitious "clone" backend portal on the internet of the company Groupon. The portal would mirror the actual portal used by Groupon and would purportedly show orders placed by Groupon and invoices submitted and paid. The CW stated that the purpose of this portal was to facilitate a fraud scheme targeting JD Factors. The CW subcontracted the creation of the portal to T.W., who lives in India. The CW provided documents and information in support of the fraud scheme, including emails and fraudulent invoices. The backend portal was created to deceive JD Factors into believing that the invoices Kent submitted to JD Factors were legitimate and were being processed by Groupon.

19. The CW further advised that approximately \$1.7 million dollars in fake invoices to Zulily were sent to JD Factors by Kent via email. The CW stated Kent created fake invoices and ledgers for Groupon and Zulily that were submitted to JD Factors for payment. Invoices Kent created were sent by the CW to T.W. to upload to the backend portal for JD Factors to review. The CW stated that T.W. placed thousands of fake invoices in the backend site. The CW further reported that Kent sent emails to JD Factors in the name of Lauren (LNU), purporting to be an employee of Groupon, in furtherance of the fraud scheme.

20. CW further advised that Blade Marketing, owned by G.G. and D.G., is part of the fraud scheme targeting JD Factors. Kent has known G.G. for approximately 8 years. According

Obtaining Money Under False Pretense, Conspiracy to Commit Credit Card Fraud, Fraud Use of Credit Card-2 counts (2Yrs supervised, probation with restitution). Records maintained under RIxxxxx034 and FBI xxxxxxAB2.

to the CW, G.G. edited fake invoices for Kent and sent them to Kent via email. Kent, in turn, forwarded the fraudulent invoices to JD Factors via email. G.G. and D.G. ensured invoices and accounts receivables matched before sending the invoices to JD Factors. According to the CW, Kent sent fraudulent invoices to JD Factors since approximately 2014 or 2015.

21. The CW further advised that, in addition to assisting Kent with the establishment of the fraudulent Groupon portal, he assisted Kent in other aspects of the fraud scheme. For example, the CW stated that he engaged in multiple conference calls with Kent and Wiley of JD Factors in which the CW, at Kent's direction, pretended to be a Groupon employee named "Michael Supinski." During these conversations, the CW, at Kent's direction, falsely assured Wiley that Groupon was processing the invoices submitted by Kent. In reality, no actual invoices had been submitted to Groupon at that time as Groupon had long before terminated its relationship with Kent Jewelers.

Recorded Conversations Between Kent and the CW

22. On or about February 24, 2017, a consensually recorded and monitored telephone call was made between the CW and Kent. During the conversation, unsolicited, Kent began relaying a conversation he had with his attorney and stated: "it's the most common...whatever you want to call it, he doesn't call it bank fraud cause it's not a bank, you know what I mean?" The CW later asked, "but they don't care even though the invoices were fake?" Kent replied, "that's what I said! The same thing I said yeah-but what about the fake invoices?" Later in the conversation Kent stated, "I kept telling him fake invoices, he understood he looked at me and goes, I understand and he goes but you know we're not going to be saying anything about fake invoices. You don't use the word ever again."

23. On or about February 25, 2017, a consensually recorded and monitored telephone call was made between the CW and Kent. During the conversation, and unsolicited, Kent said to the CW, "I think it would be smart..maybe..how do we erase all them e-mails like me and you sent back and forth you never know someone look at it you know cus (*sic*) like my lawyer said it's an accounting error, right, so I kinda (*sic*) you know tell him everything is you now public, not public, private information, you know lawyer client you know confidentiality and he goes yeah he goes, I would definitely erase all of them, you know what I mean." Later in the conversation, unsolicited, Kent described a conversation with his attorney and said, "so they said, it's an accounting error Gerry, I mean that's all it is, and he said it's not a bank so it's not fraud, this is what he said, you know what I mean, you're not dealing with a bank so don't even use the word fraud, cus (*sic*) there is no fraud you deal, if you deal with a bank it is you're not dealing with a bank he says, I said ok". CW replied, "even though the invoices are fake and everything it's not fraud?" Kent replied, "exact..well, that's what I said, you know what I mean."

24. On or about February 28, 2017, a consensually monitored recorded audio and video meeting with the CW and Kent took place at the Kent's then residence, 77 Retemann Road, North Stonington, Connecticut. During the meeting, unsolicited, Kent told the CW about a conversation he had the previous day with his attorney and referenced a 27 page document the attorney obtained from JD Factors. Kent stated to the CW: "which ones were Zulily, which ones are real, which ones were fake, which ones are real, which ones are fake, that's why it took so long." Later, Kent said: "he (his attorney) kept reiterating it's not bank fraud you're not dealing with a bank. Well it's some kind of fraud I said."

Probative Emails

25. The Government has obtained numerous emails to and from Kent at email address gerry@kentsjewelry.com. These emails were either provided to the Government by the CW or obtained through the issuance of search warrants on relevant email accounts. Before agreeing to cooperate with the Government, the CW, through his technology work for Kent, had access to Kent's computer network and emails. Prior to meeting with the Government, the CW, on his own initiative and not at the direction of law enforcement, downloaded and printed numerous pertinent emails to and from Kent's email account and his own email account and provided them to law enforcement.² The emails show that Kent repeatedly used emails in furtherance of the fraud scheme.

26. For example, the below email between Kent and the CW reflects a communication regarding the creation of fake invoices.

From: Gerry Kent gerry@kentsjewelry.com
Date: Friday, January 20, 2017
Subject: FW ZULILY TO DO
To: [CW]

PO-p00049HH8R-12-E Invoice id 21874 date 1-7-17 make this invoice so it equals aprox 16k
PO-p00049YRE7-8-E invoice id 22398 date 1-7-17 make this so it comes to 13k.

The attachments to the above email were fraudulent invoices titled ZULILY ELECTRONIC INVOICE RECEIPT, Date Received: 07 January 2017.

27. Additionally, the following email exchange between the CW and Kent reflect communication in furtherance of this fraud scheme. Attached to this email is a .pdf file

² As soon as the CW met with law enforcement and agreed to become a cooperating witness, he was instructed that he was no longer allowed to examine or search Kent's computer system or emails.

containing a fraudulent Zulily Electronic invoice receipt dated 26 October 2016 Invoice ID:
2768, value: \$29,688.90

From: [CW]
To: Gerry Kent gerry@kentsjewelry.com Sent: Thu 10/27/2016 12:09 PM
Subject: Re: FW Zulily RUSH

See attached
Amount is 29,688.90
I need \$675 to finish server. No more heart attacks. Not fun. Lol

On Thu, Oct 27, 2016 at 10:53 AM, Gerry Kent (gerry@kentsjewelry.com) wrote:

Can u make these P0003JQGH-8-E AMOUNT 24K

28. The below email by Kent to himself concerns fake invoices in furtherance of the fraud scheme. The below email contained a .pdf file containing 22 pages of invoices reflecting SOLD TO: Groupon Good.

From: Gerry Kent gerry@kentsjewelry.com
To: 'Gerry Kent'
Sent: Mon 06/06/2016 3:34AM
CC:
Subject: fake invoices for brett

29. The below email by Kent to 'bstone1' is in furtherance of this fraud scheme.

From: Gerry Kent (<mailto:gerry@kentsjewelry.com>)
Sent: Monday, April 25, 2016 3:21 PM
To: 'bstone1'
Subject: FW: 4/25-5/1 L2 M-DAY COLLECTION – COOP AGREEMENTS

Make some fake wire papers to jd to offset commsiions (sic) on these

Aggravated Identity Theft

30. As mentioned above, the CW has reported that Kent asked him and an unidentified female to pose as Groupon employees in teleconferences with Wiley of JD Factors. During these conferences, the CW pretended to be a Groupon employee named "Michael Supinski" and informed Wiley, in sum and in substance, that Groupon was behind in its payments to JD Factors but that further payments were forthcoming. In addition, Kent and the CW sent JD Factors emails from purported Groupon employee "Michael Supinski" concerning the Kent Jewelers account. Groupon has confirmed that no individual named "Michael Supinski" ever worked for Groupon.

31. In addition, Kent arranged for an unidentified female to pose as Groupon employee L.H. during teleconferences and email exchanges with Wiley of JD Factoring. During these communications, the woman posing as L.H. informed JD Factors, in sum and in substance, that Groupon was behind in its payments to JD Factors but that further payments were forthcoming. In addition, Kent caused emails to be sent or forwarded to JD Factors purporting to be from L.H.

32. For example, on or about January 19, 2017, Kent forwarded to JD Factors a purported email he received from L.H. of Groupon. The email was purportedly sent from an email address using the domain namegroupon.com. In that email, L.H. purportedly wrote: "Hi Gerry. Here is the info to answer your question, Mike [Supinski] will explain later the mix up on these invoices. he said it's fixed now. He had me fix also in portal. . . . Based on our conversation, going forward all cost for advertising will be taken from invoices and Kents will be paying separately by wire." The email signature was of L.H., Buyer: Fashion Jewelry, Groupon

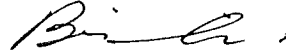
Goods in Chicago, Ill. This email was not sent by L.H. or anyone else at Groupon. As detailed above, Groupon had terminated its relationship with Kent Jewelers on August 1, 2016.

33. L.H. is an actual Groupon employee working in Chicago, Illinois. On June 27, 2017, the undersigned interviewed L.H., who stated that she has worked at Groupon for approximately three years as an Assistant Buyer and Buyer of Jewelry. In that capacity, she did have communications with Kent and a third party representing Kent until approximately August 2016. At that time, Groupon terminated its relationship with Kent Jewelers due to non-delivery of goods by Kent Jewelers to Groupon customers. L.H. indicated that she has not communicated with Kent in any way since that time and that she has never communicated with anyone from J.D. Factors. L.H. was shown several emails bearing her name, including the aforementioned email forwarded by Kent to JD Factors on January 19, 2017. L.H. stated that she did not author these emails, which purported to be sent from her email account at Groupon.

CONCLUSION

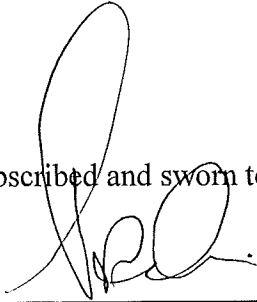
34. Based on the forgoing, there is probable cause to believe that: (i) From in or about December 2014 to in or about February 2017, defendant GERALD KENT, having devised and intended to devise a scheme and artifice to defraud and to obtain money and property by means of false and fraudulent pretenses, representations and promises, did transmit and cause to be transmitted in interstate commerce, any writings, signs and signals, to wit hundreds of fraudulent invoices, for the purpose of executing such scheme and artifice, in violation of 18 U.S.C. § 1343 (Count One – Wire Fraud); and (ii) From on or about January 1, 2017 to on or about February 10, 2017, defendant GERALD KENT, during and in relation to the offense of Wire Fraud, contrary to 18 U.S.C. § 1343, did knowingly transfer, possess and use, without lawful authority,

the means of identification of another person, to wit the name of L.H., in violation of 18 U.S.C. § 1028A (Count Two – Aggravated Identity Theft).



Brian Sindoni
Senior Special Agent
United States Secret Service

Subscribed and sworn to before me on July 17, 2017



Honorable Patricia A. Sullivan
United States Magistrate Judge