

FILED

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
JACKSONVILLE DIVISION

2023 MAR 22 PM 3:18

CLERK, US DISTRICT COURT
MIDDLE DISTRICT OF FL
JACKSONVILLE FLORIDA

UNITED STATES OF AMERICA

v.

CASE NO. 3:23-cr-48-TJC-LLL

CHRISTOPHER LEO DARAGJATI

18 U.S.C. § 1343
18 U.S.C. § 1028A
42 U.S.C. § 408
18 U.S.C. § 641

INDICTMENT

The Grand Jury charges:

COUNTS ONE - THREE
(Wire Fraud)

A. Introduction

At all times relevant to this Indictment:

1. The defendant resided in the Middle District of Florida.
2. Itria Ventures LLC ("Itria") was a financial services company that among other services assisted businesses in accessing the Small Business Administration Paycheck Protection Program.
3. Itria utilized a loan application portal in the state of New York, as part of conducting nationwide business operations.
4. Prestamos Community Development Financial Institution ("Prestamos") was a financial services company that among other services assisted businesses in accessing the Small Business Administration Paycheck Protection

Program. Prestamos worked with Blue Acorn to access the Small Business Administration Paycheck Protection Program.

5. Blue Acorn was a lending service that among other services worked with companies to assist businesses in accessing the Small Business Administration Paycheck Protection Program.

6. Blue Acorn utilized computer servers / data centers in the state of Virginia, as part of conducting nationwide business operations.

7. Cross River Bank ("Cross River") was a financial services company with computer servers located in Pennsylvania that among other services assisted businesses in accessing the Small Business Administration Paycheck Protection Program. Cross River worked with Revenued to access the Small Business Administration Paycheck Protection Program.

8. Revenued was a lending service headquartered in New Jersey that among other services worked with companies to assist businesses in accessing the Small Business Administration Paycheck Protection Program.

The Small Business Administration

9. The United States Small Business Administration ("SBA") was an executive branch agency of the United States government that provided support to entrepreneurs and small businesses.

10. The SBA enabled and provided for loans through banks, credit unions, and other lenders. These loans had government-backed guarantees. In addition to traditional SBA funding programs, The CARES Act, established several new

temporary programs and provided for the expansion of others to address the COVID-19 outbreak.

The Paycheck Protection Program

11. One of the new programs was the SBA Paycheck Protection Program (“PPP”), which was a loan designed to provide a direct incentive for small businesses to keep their workers on the payroll. Under this program, the SBA could forgive all or part of a loan, if employees were kept on the payroll for eight weeks and borrowers submitted documentation confirming that the loan proceeds were used for certain qualifying business expenses (i.e., payroll, rent, mortgage interest, or utilities).

12. The PPP application process required interested applicants to electronically submit a SBA Form 2483 - Borrower Application Form (“SBA Form 2483”). The application contained information as to the purpose of the loan, average monthly payroll, number of employees, and background of the business and its owner. Applicants were also required to make certain good faith certifications, including that economic uncertainties had necessitated their loan requests for continued business operations, and that they intended to use loan proceeds only for the authorized purposes.

13. Further, when submitting the SBA Form 2483, the authorized representative certified his understanding that, should the PPP funds be knowingly used for unauthorized purposes, the United States could hold him legally liable, including for charges of fraud. The applicant was also required to certify the truth and accuracy of any information provided on the SBA Form 2483 and in all

supporting documents, to include any documents intended to verify the applicant's payroll expenses. The applicant was required to certify an understanding that knowingly making a false statement to obtain a guaranteed loan from the SBA is punishable under the law and subject to criminal penalties.

B. The Scheme and Artifice

14. Beginning on an unknown date, but no later than in or around February 2021, and continuing through at least in or around June 2021, in the Middle District of Florida and elsewhere, the defendant,

CHRISTOPHER LEO DARAGJATI,

knowingly devised and intended 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.

C. Manner and Means of the Scheme and Artifice

15. The manner and means by which the defendant sought to accomplish the scheme to defraud included, among others, the following:

Itria Ventures LLC

a. It was part of the scheme and artifice that the defendant would and did fraudulently complete an IRS Form 940 for 2019: Employer's Annual Federal Unemployment Tax Return ("IRS Form 940") for purposes of applying for a PPP loan to which he was not entitled;

b. It was further a part of the scheme and artifice that when fraudulently completing the IRS Form 940 the defendant used the identity of another person, J.W.;

c. It was further a part of the scheme and artifice that when fraudulently completing the IRS Form 940 the defendant, using the identity of another person, J.W., declared under penalties of perjury that the IRS Form 940 was true, correct, and complete;

d. It was further part of the scheme and artifice that the defendant would and did fraudulently complete an IRS Form 941 for 2020: Employer's Quarterly Federal Tax Return ("IRS Form 941") for purposes of applying for a PPP loan to which he was not entitled;

e. It was further a part of the scheme and artifice that when fraudulently completing the IRS Form 941 the defendant used the identity of another person, J.W.;

f. It was further a part of the scheme and artifice that when fraudulently completing the IRS Form 941 the defendant, using the identity of another person, J.W., declared under penalties of perjury that the IRS Form 941 was true, correct, and complete;

g. It was further part of the scheme and artifice that the defendant would and did fraudulently complete an Itria "Loan Agreement for Paycheck Protection Program Loan" ("Loan Agreement") for purposes of applying for a PPP loan to which he was not entitled;

h. It was further a part of the scheme and artifice that when fraudulently completing the Loan Agreement the defendant used the identity of another person, J.W.;

i. It was further a part of the scheme and artifice that when fraudulently completing the Loan Agreement the defendant, using the identity of another person, J.W., stated that he truthfully answered all of the questions and certifications on the borrower application;

j. It was further part of the scheme and artifice that the defendant would and did fraudulently complete an Itria "Paycheck Protection Program Promissory Note" ("Promissory Note") for purposes of applying for a PPP loan to which he was not entitled;

k. It was further a part of the scheme and artifice that when fraudulently completing the Promissory Note the defendant used the identity of another person, J.W.;

l. It was further part of the scheme and artifice that the defendant would and did fraudulently complete an Itria "Authorization for PPP Loan Disbursement and ACH Debits" ("Authorization for Disbursement") for purposes of applying for a PPP loan to which he was not entitled;

m. It was further a part of the scheme and artifice that when fraudulently completing the Authorization for Disbursement the defendant used the identity of another person, J.W.;

n. It was further part of the scheme and artifice that the defendant would and did fraudulently complete a PPP loan application, that is, a SBA Form 2483 - Borrower Application Form for purposes of applying for a PPP loan to which he was not entitled;

o. It was further a part of the scheme and artifice that when fraudulently completing the SBA Form 2483 - Borrower Application Form the defendant used the identity of another person, J.W.;

p. It was further a part of the scheme and artifice that when fraudulently completing the SBA Form 2483 - Borrower Application Form, using the identity of another person, J.W., the defendant falsely represented his Social Security number as a certain Social Security number ending in XXX-XX-5692;

q. It was further a part of the scheme and artifice that, in order to induce the SBA and Itria to fund a PPP loan, the defendant would and did submit, using the identity of another person, J.W., a false and fraudulent PPP loan application that included multiple materially false and fraudulent representations and pretenses, such as:

- i. the average monthly payroll and the number of employees;
- ii. listing that the purpose of the loan was to cover payroll costs;
- iii. listing himself as the owner of the business;
- iv. certifying that the funds will be used to retain workers and maintain payroll; and

v. certifying the truth of the statements in the loan application;

r. It was further part of the scheme and artifice that the defendant would and did send Itria a copy of a fraudulently obtained Florida Identification Card in the identity of another person, J.W., but with a picture of the defendant on it;

s. It was further a part of the scheme and artifice that the defendant would and did send Itria information about an account at Middlesex Federal Savings that the defendant fraudulently opened in the identity of J.W. into which the fraudulently obtained PPP loan proceeds, money, could be transferred via an ACH payment/wire transfer;

t. It was further a part of the scheme and artifice that the defendant would and did cause Itria to send PPP loan proceeds, money, via an ACH/wire transfer to an account at Middlesex Federal Savings that he fraudulently opened in the identity of J.W.;

Prestamos Community Development Financial Institution

u. It was further a part of the scheme and artifice that the defendant would and did fraudulently complete an IRS Form W-9 Request for Taxpayer Identification Number and Certification ("IRS Form W-9") for purposes of applying for a PPP loan to which he was not entitled;

v. It was further a part of the scheme and artifice that when fraudulently completing the IRS Form W-9 the defendant used the identity of another person, C.H.;

w. It was further a part of the scheme and artifice that when fraudulently completing the IRS Form W-9 the defendant, using the identity of another person, C.H., certified under penalties of perjury that the number shown on the form was his correct taxpayer identification number;

x. It was further part of the scheme and artifice that the defendant would and did fraudulently complete an IRS Form 1040 Schedule C Profit or Loss From Business ("IRS Form 1040") for purposes of applying for a PPP loan to which he was not entitled;

y. It was further a part of the scheme and artifice that when fraudulently completing the IRS Form 1040 the defendant used the identity of another person, C.H.;

z. It was further part of the scheme and artifice that the defendant would and did fraudulently complete a PPP loan application, that is, a SBA Form 2483-SD Second Draw Borrower Application Form for purposes of applying for a PPP loan to which he was not entitled;

aa. It was further a part of the scheme and artifice that when fraudulently completing the SBA Form 2483 – SD Second Draw Borrower Application the defendant used the identity of another person, C.H.;

bb. It was further a part of the scheme and artifice that when fraudulently completing the SBA Form 2483 – SD Second Draw Borrower Application, using the identity of another person, C.H., the defendant falsely represented his Social Security number as a certain Social Security number ending in XXX-XX-1703;

cc. It was further a part of the scheme and artifice that, in order to induce the SBA and Prestamos to fund a PPP loan, the defendant would and did submit, using the identity of another person, C.H., a false and fraudulent PPP loan application that included multiple materially false and fraudulent representations and pretenses, such as:

- i. the average monthly payroll and the number of employees;
 - ii. listing that the purpose of the loan was to cover payroll costs, rent/mortgage interest, utilities, and covered operations expenditures;
 - iii. listing himself as the owner of the business;
 - iv. certifying that the funds will be used to retain workers and maintain payroll;
 - v. certifying the truth of the statements in the application;
- and

dd. It was further part of the scheme and artifice that the defendant would and did send Prestamos a copy of a fraudulently obtained Florida Identification Card in the identity of another person, C.H., but with a picture of the defendant on it;

ee. It was further part of the scheme and artifice that the defendant would and did send Prestamos a picture of himself, but using the identity of C.H.;

ff. It was further a part of the scheme and artifice that the defendant would and did send Prestamos information about an account at Fairwinds Credit Union that the defendant fraudulently opened in the identity of C.H. into which the fraudulently obtained PPP loan proceeds, money, could be transferred via an ACH payment/wire transfer;

gg. It was further a part of the scheme and artifice that the defendant would and did cause Prestamos to send PPP loan proceeds, money, via an ACH/wire transfer to an account at Fairwinds Credit Union that he fraudulently opened in the identity of C.H.;

hh. It was further a part of the scheme and artifice that the defendant would and did retain fraud proceeds from the three above referenced PPP loans for the defendant's personal enrichment and entertainment;

ii. It was further a part of scheme and artifice that the defendant would and did perform acts, and make statements to promote and achieve the object of the scheme and artifice and to misrepresent, hide, and conceal, and cause to be misrepresented, hidden, and concealed, the purpose of the scheme and artifice and the acts committed in furtherance thereof.

Cross River Bank

jj. It was further part of the scheme and artifice that the defendant would and did fraudulently complete an IRS Form 1040 Schedule C Profit or Loss

From Business ("IRS Form 1040") for purposes of applying for a PPP loan to which he was not entitled;

kk. It was further a part of the scheme and artifice that when fraudulently completing the IRS Form 1040 the defendant used the identity of another person, C.H.;

ll. It was further part of the scheme and artifice that the defendant would and did fraudulently complete a PPP loan application, that is, a SBA Form 2483 - Borrower Application Form for purposes of applying for a PPP loan to which he was not entitled;

mm. It was further a part of the scheme and artifice that when fraudulently completing the SBA Form 2483 - Borrower Application Form the defendant used the identity of another person, C.H.;

nn. It was further a part of the scheme and artifice that when fraudulently completing the SBA Form 2483 - Borrower Application Form, using the identity of another person, C.H., the defendant falsely represented his Social Security number as a certain Social Security number ending in XXX-XX-1703;

oo. It was further a part of the scheme and artifice that, in order to induce the SBA and Cross River to fund a PPP loan the defendant would and did submit, using the identity of another person, C.H., a false and fraudulent PPP loan application that included multiple materially false and fraudulent representations and pretenses, such as:

- i. the average monthly payroll and the number of employees;
 - ii. listing that the purpose of the loan was to cover payroll;
 - iii. listing himself as the owner of the business;
 - iv. certifying that the funds will be used to retain workers and maintain payroll;
 - v. certifying the truth of the statements in the application;
- and

pp. It was further part of the scheme and artifice that the defendant would and did send Cross River a copy of a fraudulently obtained Florida Identification Card in the identity of another person, C.H., but with a picture of the defendant on it;

qq. It was further a part of the scheme and artifice that the defendant would and did send Cross River information about an account at Metropolitan Commercial Bank in the identity of C.H. into which the fraudulently obtained PPP loan proceeds, money, could be transferred via an ACH payment/wire transfer;

rr. It was further a part of the scheme and artifice that the defendant would and did cause Cross River to send PPP loan proceeds, money, via an ACH/wire transfer to an account at Metropolitan Commercial Bank in the identity of C.H.;

D. Execution of the Scheme and Artifice

16. On or about the dates set forth below in each count, in the Middle District of Florida, and elsewhere, for the purpose of executing the aforesaid scheme and artifice, and attempting to do so, the defendant,

CHRISTOPHER LEO DARAGJATI,

did knowingly transmit and cause to be transmitted by means of wire in interstate commerce the following:

<u>COUNT</u>	<u>DATE</u>	<u>ACH/WIRE TRANSACTION</u>
ONE	February 5, 2021	Transfer of PPP loan proceeds from Itria to an account at Middlesex Federal Savings that the defendant controlled in the amount of \$111,107.50
TWO	March 3, 2021	Transfer of PPP loan proceeds from Cross River to an account at Metropolitan Commercial Bank that the defendant controlled in the amount of \$19,733
THREE	June 10, 2021	Transfer of PPP loan proceeds from Prestamos to an account at Fairwinds Credit Union that the defendant controlled in the amount of \$19,732

In violation of 18 U.S.C. § 1343.

COUNTS FOUR - SIX
(Aggravated Identity Theft)

17. On or about the dates set forth below, in the Middle District of Florida, and elsewhere, the defendant,

CHRISTOPHER LEO DARAGJATI,

did knowingly possess and use without lawful authority, a means of identification of another person, that is, the Social Security number of the individuals listed below,

during and in relation to a felony enumerated in 18 U.S.C. § 1028A, that is, wire fraud, in violation of 18 U.S.C. § 1343, and falsely representing a Social Security number, in violation of 42 U.S.C. § 408(a)(7)(B), as described below:

<u>COUNT</u>	<u>DATE</u>	<u>PPP LOAN LENDER</u>	<u>SOCIAL SECURITY NUMBER</u>	<u>INDIVIDUAL</u>
FOUR	February 2, 2021	Itria	XXX-XX-5692	J.W.
FIVE	March 1, 2021	Cross River	XXX-XX-1703	C.H.
SIX	May 10, 2021	Prestamos	XXX-XX-1703	C.H.

In violation of 18 U.S.C. § 1028A(a)(1).

COUNTS SEVEN & EIGHT
(Falsely Representing a Social Security Number)

18. On or about the dates set forth below, in the Middle District of Florida, and elsewhere, the defendant,

CHRISTOPHER LEO DARAGJATI,

for the purpose of obtaining something of value and for other purposes, did knowingly and with the intent to deceive another person and organization, falsely represent to the Florida Highway Safety and Motor Vehicles, Lake County Tax Collector, and the Orange County Tax Collector, his Social Security number to be a certain Social Security number, when in fact, as the defendant well knew, that the certain Social Security number was not assigned to the defendant, as set for below:

<u>COUNT</u>	<u>DATE</u>	<u>LOCATION</u>	<u>SOCIAL SECURITY NUMBER</u>
SEVEN	September 11, 2019	Lake County Tax Collector	XXX-XX-5692
EIGHT	January 20, 2021	Orange County Tax Collector	XXX-XX-1703

In violation of 42 U.S.C. § 408(a)(7)(B).

COUNTS NINE & TEN
(Aggravated Identity Theft)

19. On or about the dates set forth below, in the Middle District of Florida, and elsewhere, the defendant,

CHRISTOPHER LEO DARAGJATI,

did knowingly possess and use without lawful authority, a means of identification of another person, that is, the Social Security number of the individuals listed below, during and in relation to a felony enumerated in 18 U.S.C. § 1028A, that is, falsely representing a Social Security number, in violation of 42 U.S.C. § 408(a)(7)(B), as described below:

<u>COUNT</u>	<u>DATE</u>	<u>LOCATION</u>	<u>SOCIAL SECURITY NUMBER</u>	<u>INDIVIDUAL</u>
NINE	September 11, 2019	Lake County Tax Collector	XXX-XX-5692	J.W.
TEN	January 20, 2021	Orange County Tax Collector	XXX-XX-1703	C.H.

In violation of 18 U.S.C. § 1028A(a)(1).

COUNT ELEVEN
(Theft of Government Property, More Than \$1,000)

20. Beginning in or about January 2022, and continuing through in or about February 2022, in the Middle District of Florida, and elsewhere, the defendant,

CHRISTOPHER LEO DARAGJATI,

did knowingly and willfully embezzle, steal, purloin, and convert to the defendant's use and the use of another, more than \$1,000 of money and a thing of value of the United States and Internal Revenue Service, a department and agency of the United States, that is, money, with intent to deprive the United States and Internal Revenue Service of the use and benefit of the money and thing of value by filing a false tax return using the identity of another person, J.W., and subsequently receiving a tax refund of more than \$1,000 from the Internal Revenue Service.

In violation of 18 U.S.C. § 641.

COUNT TWELVE
(Aggravated Identity Theft)

21. On or about the date set forth below, in the Middle District of Florida, and elsewhere, the defendant,

CHRISTOPHER LEO DARAGJATI,

did knowingly possess and use without lawful authority, a means of identification of another person, that is, the Social Security number of the individual listed below, during and in relation to a felony enumerated in 18 U.S.C. § 1028A, that is, theft of

government property, the amount being greater than \$1,000, in violation of 18 U.S.C. § 641, as described below:

<u>COUNT</u>	<u>DATE OF FALSE TAX RETURN</u>	<u>SOCIAL SECURITY NUMBER</u>	<u>INDIVIDUAL</u>
TWELVE	January 26, 2022	XXX-XX-5692	J.W.

In violation of 18 U.S.C. § 1028A(a)(1).

COUNTS THIRTEEN - SIXTEEN
(Wire Fraud)

A. Introduction

At all times relevant to this Indictment:

22. The defendant resided in the Middle District of Florida.

National Crime Information Center

23. The National Crime Information Center (“NCIC”) is a criminal records database allowing criminal justice agencies to enter or search for information about stolen property, missing or wanted persons, and domestic violence protection orders; to get criminal histories; and to access the National Sex Offender Registry. Criminal justice agencies to include local, state, and federal law enforcement can enter arrest warrants for individuals into NCIC.

Sunbelt Rentals

24. Sunbelt Rentals is an equipment rental business that operates internationally throughout North America. Sunbelt Rentals rents a variety of equipment ranging from air compressors to different kinds of tools.

25. Sunbelt Rentals offered customers the ability to apply online for a commercial credit account. If approved, the commercial credit account authorized customers to use a line of credit to rent equipment from Sunbelt Rentals.

26. Sunbelt Rentals utilized a credit portal server located in South Carolina, as part of conducting nationwide business operations.

B. The Scheme and Artifice

27. Beginning on an unknown date, but no later than in or around April 2022, and continuing through at least in or around August 2022, in the Middle District of Florida and elsewhere, the defendant,

CHRISTOPHER LEO DARAGJATI,

knowingly devised and intended 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.

C. Manner and Means of the Scheme and Artifice

28. The manner and means by which the defendant sought to accomplish the scheme to defraud included, among others, the following:

a. It was part of the scheme and artifice that the defendant would and did fraudulently complete an online application using the identity of another person, J.W., for a commercial credit account with Sunbelt Rentals for the purposes of using a line of credit to fraudulently rent equipment from Sunbelt Rentals involving the business, Master Seal Asphalt;

b. It was further a part of the scheme and artifice that when fraudulently completing the online application with Sunbelt Rentals, using the identity of another person, J.W., the defendant falsely represented his Social Security number as a certain Social Security number ending in XXX-XX-5692;

c. It was further a part of the scheme and artifice that the defendant would and did fraudulently complete an online application using the identity of another person, G.M., for a commercial credit account with Sunbelt Rentals for the purposes of using a line of credit to fraudulently rent equipment from Sunbelt Rentals involving the business, Mix Bros Inc.;

d. It was further a part of the scheme and artifice that when fraudulently completing the online application with Sunbelt Rentals, using the identity of another person, G.M., the defendant falsely represented his Social Security number as a certain Social Security number ending in XXX-XX-4450;

e. It was further a part of the scheme and artifice that the defendant would and did fraudulently complete an online application using the identity of another person, C.E., for a commercial credit account with Sunbelt Rentals for the purposes of using a line of credit to fraudulently rent equipment from Sunbelt Rentals involving the business, Mastermore Properties;

f. It was further a part of the scheme and artifice that when fraudulently completing the online application with Sunbelt Rentals, using the identity of another person, C.E., the defendant falsely represented his Social Security number as a certain Social Security number ending in XXX-XX-9710;

g. It was further a part of the scheme and artifice that the defendant would and did fraudulently complete an online application using the identity of another person, P.T., for a commercial credit account with Sunbelt Rentals for the purposes of using a line of credit to fraudulently rent equipment from Sunbelt Rentals involving the business, Torkelson Inc;

h. It was further a part of the scheme and artifice that when fraudulently completing the online application with Sunbelt Rentals, using the identity of another person, P.T., the defendant falsely represented his Social Security number as a certain Social Security number ending in XXX-XX-3605;

i. It was further a part of the scheme and artifice that, after Sunbelt Rentals approved the fraudulent online applications for Master Seal Asphalt, Mix Bros Inc, Mastermore Properties, and Torkelson Inc, the defendant would and did fraudulently rent a variety of equipment ranging from air compressors to different kinds of tools, using the identities of J.W., G.M., C.E. and P.T.;

j. It was further a part of the scheme and artifice that after the defendant fraudulently rented a variety of equipment ranging from air compressors to different kinds of tools, using the identities of J.W., G.M., C.E., and P.T., the defendant would not return the rented equipment, instead, pawning said fraudulently rented equipment, resulting in a felony arrest warrant for P.T. being entered into NCIC by a member of law enforcement;

E. Execution of the Scheme and Artifice

29. On or about the dates set forth below, in the Middle District of Florida, and elsewhere, for the purpose of executing the aforesaid scheme and artifice, and attempting to do so, the defendant,

CHRISTOPHER LEO DARAGJATI,

did knowingly transmit and cause to be transmitted by means of wire in interstate commerce the following:

<u>COUNT</u>	<u>DATE</u>	<u>SUNBELT RENTALS CREDIT PORTAL SERVER</u>
THIRTEEN	March 10, 2022	Submission of "Application for Credit and Rental Agreement" in the identity of P.T. for Torkelson Inc
FOURTEEN	March 23, 2022	Submission of "Application for Credit and Rental Agreement" in the identity of G.M. for Mix Bros Inc
FIFTEEN	April 11, 2022	Submission of "Application for Credit and Rental Agreement" in the identity of J.W. for Master Seal Asphalt
SIXTEEN	May 6, 2022	Submission of "Application for Credit and Rental Agreement" in the identity of C.E. for Mastermore Properties

In violation of 18 U.S.C. § 1343.

COUNTS SEVENTEEN - TWENTY
(Aggravated Identity Theft)

30. On or about the dates set forth below, in the Middle District of Florida, and elsewhere, the defendant,

CHRISTOPHER LEO DARAGJATI,

did knowingly possess and use without lawful authority, a means of identification of another person, that is, the Social Security number of the individuals listed below,

during and in relation to a felony enumerated in 18 U.S.C. § 1028A, that is, wire fraud, in violation of 18 U.S.C. § 1343, and falsely representing a Social Security number, in violation of 42 U.S.C. § 408(a)(7)(B), as described below:

<u>COUNT</u>	<u>DATE</u>	<u>SOCIAL SECURITY NUMBER</u>	<u>INDIVIDUAL</u>
SEVENTEEN	March 10, 2022	XXX-XX-3605	P.T.
EIGHTEEN	March 23, 2022	XXX-XX-4450	G.M.
NINETEEN	April 11, 2022	XXX-XX-5692	J.W.
TWENTY	May 6, 2022	XXX-XX-9710	C.E.

In violation of 18 U.S.C. § 1028A(a)(1).

FORFEITURE

1. The allegations contained in Counts One through Three, Eleven, Thirteen through Sixteen are incorporated by reference for the purpose of alleging forfeiture pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c).

2. Upon conviction of a violation of 18 U.S.C. § 1343 and/or 18 U.S.C. § 641(c) the defendant shall forfeit to the United States, pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the violation.

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

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;

- 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 divided without difficulty,

the United States shall be entitled to forfeiture of substitute property pursuant to 21 U.S.C. § 853(p), as incorporated by 28 U.S.C. § 2461(c).

A TRUE BILL,



Foreperson

ROGER B. HANDBERG
United States Attorney

By: Kevin C. Frein
KEVIN C. FREIN
Assistant United States Attorney

By: Kelly S. Karase
KELLY S. KARASE
Assistant United States Attorney
Deputy Chief, Jacksonville Division

No.

UNITED STATES DISTRICT COURT
Middle District of Florida
Jacksonville Division

THE UNITED STATES OF AMERICA

vs.

CHRISTOPHER LEO DARAGJATI

INDICTMENT

Violations: CTs 1-3 and 13-16: 18 U.S.C. § 1343
CTs 4-6, 9-10, 12 and 17-20: 18 U.S.C. § 1028A(a)(1)
CTs 7-8: 42 U.S.C. § 408(a)(7)(B)
CT 11: 18 U.S.C. § 641

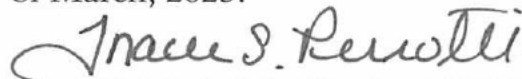
A true bill,



Foreperson

Filed in open court this 22 day

of March, 2023.



Clerk

Bail \$ _____
