UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 24-CR-60168-DIMITROULEAS

UNITED STATES OF AMERICA

v.

CONRAD BRANDON BERNARD,

Defendant.

PRELIMINARY ORDER OF FORFEITURE

THIS MATTER is before the Court upon motion of the United States of America (the "United States") for entry of a Preliminary Order of Forfeiture ("Motion") against Defendant **CONRAD BRANDON BERNARD** (the "Defendant"). The Court has considered the Motion, is otherwise advised in the premises, and finds as follows:

On November 12, 2024, the United States filed a Superseding Information charging the Defendant in Counts 1–6 with Bank Fraud in violation of 18 U.S.C. § 1344, in Count 7 with Possession of Fifteen or More Unauthorized Access Devices in violation of 18 U.S.C. § 1029(a)(3), and in Counts 8 and 9 with Aggravated Identity Theft in violation of 18 U.S.C. § 1028A. Superseding Information, ECF No. 33. The Superseding Information also contained forfeiture allegations, which alleged that upon conviction of a violation of 18 U.S.C. § 1029, the Defendant shall forfeit to the United States: (a) any property constituting, or derived from, proceeds obtained, directly or indirectly, as the result of such offense, pursuant to 18 U.S.C. § 982(a)(2)(B); and (b) any personal property used, or intended to be used, to commit such offense, pursuant to 18 U.S.C. § 1029(c)(1)(C). *See id.* at 19. The forfeiture allegations also alleged that upon a conviction of a violation of 18 U.S.C. § 1344, the Defendant shall forfeit to the United

States any property constituting, or derived from, proceeds obtained, directly or indirectly, as the result of such offenses and fraud scheme, pursuant to 18 U.S.C. § 982(a)(2)(A). *See id.*

On November 15, 2024, the Court accepted the Defendant's guilty plea to Counts 1, 6, 7, and 8 of the Superseding Information. *See* Minute Entry, ECF No. 34; Plea Agreement ¶ 1, ECF No. 36. As part of the guilty plea, the Defendant agreed to a forfeiture money judgment in the amount of $1,083,340 and the forfeiture of the assets listed below:

a. All assets, including any funds, securities, and cryptocurrencies or other digital assets, stored in, accessible via, and/or on deposit in Robinhood Markets, Inc. account number 895707297, held in the name of S.H.;

b. All assets, including any funds, securities, and cryptocurrencies or other digital assets, formerly stored in, accessible via, and/or on deposit in Robinhood Markets, Inc. account number 963802624, held in the name of A.F., approximately $69,535.12 of which is currently held by the State of Michigan under property identification number 3083441850;

c. All assets, including any funds, securities, and cryptocurrencies or other digital assets, formerly stored in, accessible via, and/or on deposit in Robinhood Markets, Inc. account number 733596985, held in the name of J.K., approximately $40,579.71 of which is currently held by the State of Michigan under property identification number 30834359;

d. All assets, including any funds, securities, and cryptocurrencies or other digital assets, formerly stored in, accessible via, and/or on deposit in Robinhood Markets, Inc. account number 612984559, held in the name of A.G., approximately $155,391.29 of which is currently held by the State of Michigan under property identification number 30814411;

e. All assets, including any funds, securities, and cryptocurrencies or other digital assets, formerly stored in, accessible via, and/or on deposit in Robinhood Markets, Inc. account number 566568309, held in the name of C.G., approximately $98,357.99 of which is currently held by the State of Michigan under property identification number 30850593;

f. All assets, including any funds, securities, and cryptocurrencies or other digital assets, stored in, accessible via, and/or on deposit in Robinhood Markets, Inc. account number 430883090, held in the name of C.R.;

g. All assets, including any funds, securities, and cryptocurrencies or other digital assets, formerly stored in, accessible via, and/or on deposit in Robinhood Markets,

Inc. account number 881031496, held in the name of K.L., approximately $70,295.37 of which is currently held by the State of Michigan under property identification number 30833469;

h. All assets, including any funds, securities, and cryptocurrencies or other digital assets, stored in, accessible via, and/or on deposit in Robinhood Markets, Inc. account number 706188737, held in the name of G.R.;

i. All assets, including any funds, securities, and cryptocurrencies or other digital assets, formerly stored in, accessible via, and/or on deposit in Robinhood Markets, Inc. account number 616320958, held in the name of M.M., approximately $87,499.72 of which is currently held by the State of Florida;

j. All assets, including any funds, securities, and cryptocurrencies or other digital assets, stored in, accessible via, and/or on deposit in Robinhood Markets, Inc. account number 769545740, held in the name of R.B.;

k. All assets, including any funds, securities, and cryptocurrencies or other digital assets, formerly stored in, accessible via, and/or on deposit in Robinhood Markets, Inc. account number 712854165, held in the name of S.A., approximately $65,667.08 of which is currently held by the State of Michigan under property identification number 30823008;

l. All assets, including any funds, securities, and cryptocurrencies or other digital assets, formerly stored in, accessible via, and/or on deposit in Robinhood Markets, Inc. account number 440859379, held in the name of B.P.;

m. All funds formerly on deposit in Wells Fargo Bank NA account number 3313637625, held in the name of T.H.; and

n. All funds formerly on deposit in Wells Fargo Bank NA account number 7171407062, held in the name of T.T.

Plea Agreement ¶ 13.

In support of the guilty plea, the Defendant executed a Factual Proffer, and the Court found that there was a factual basis to support the Defendant's conviction. *See* Factual Proffer, ECF No. 37. The Factual Proffer also provided a basis for the forfeiture of property. *See id.* at 2–4.

Beginning as early as in or around May 2020 and continuing through on or about December 2022, the Defendant engaged and executed a scheme to defraud Wells Fargo Bank NA ("Wells Fargo") and TD Bank, N.A. ("TD Bank") for personal gain by using the name and personal

identification information ("PII") of other individuals without their knowledge or consent to create accounts at Wells Fargo and TD Bank. *See* Factual Proffer 2–3. The Defendant then fraudulently impersonate those individuals for the purpose of transferring or withdrawing funds owned by or under the custody or control of Wells Fargo and TD Bank. *See id.*

The Defendant accomplished this scheme by fraudulently applying for fourteen (14) separate Economic Injury Disaster Loans ("EDIL") using the PII of other individuals without their knowledge or consent. *See id.* at 3. Once the Small Business Administration ("SBA") approved the fraudulent applications, the SBA transferred the EIDL funds to various Wells Fargo bank accounts at The Defendant's direction. *See id.* The Defendant opened and operated these Wells Fargo accounts using the PII of other individuals without those individuals' knowledge or consent. *See id.* The Defendant then transferred those funds from the Wells Fargo bank accounts to other accounts under his control, including various accounts held with Robinhood Markets, Inc. ("Robinhood")—Robinhood accounts that the Defendant created using the PII of other individuals without their knowledge or consent. *See id.* In one instance, on July 28, 2020, the Defendant transferred $50,000 of EIDL funds from Wells Fargo Account ending in 4245, an account the Defendant opened and operated using the PII of R.B. without R.B.'s knowledge or consent, to a Robinhood account ending in 9379, another account the Defendant opened using the PII of B.P. without B.P.'s knowledge or consent. *See* Factual Proffer 3.

The Defendant also accomplished his bank fraud scheme by transferring or withdrawing fraudulently obtained unemployment benefit proceeds from various Wells Fargo accounts that he opened and operated using the PII of other individuals without their knowledge or consent. *See id.* These fraudulently obtained unemployment benefits were paid by several states, including West Virginia and Arizona. *See id.* at 3–4. The unemployment benefit proceeds were fraudulently

obtained because the name and PII of other individuals were used to apply for the unemployment benefits without those individuals' knowledge or consent. *See id.* at 4.

In all, the Defendant fraudulently obtained $1,083,340 in EIDL proceeds and unemployment benefits and transferred, and/or withdrew, those criminally derived proceeds to, and/or from, Wells Fargo accounts ending in 5375, 4245, 5268, 3482,[1] 2318, 9488, 9990, 2894, 4172, 7265, 6550, 3644, 0406, 1824, 6920, and 9545—bank accounts that the Defendant opened and operated using the PII of other individuals without their knowledge or consent. *See id.* From there, the Defendant caused at least a portion of the criminal proceeds to ultimately come to rest in Robinhood Markets, Inc. accounts ending in 7297, 2624, 6985, 4559, 8309, 3090, 1496, 8737, 0958, 5740, 4165, and 9379, and in Wells Fargo accounts ending in 7625 and 7062—accounts that the Defendant opened and operated using the PII of other individuals without their knowledge or consent. *See id.*

Based on the record in this case, the total value of the proceeds the Defendant obtained as a result of the offenses of conviction and fraud scheme is $1,083,340, which sum may be sought as a forfeiture money judgment pursuant to Rule 32.2 of the Federal Rules of Criminal Procedure.

In addition, also based on the record in this case, the following specific property is directly subject to forfeiture, pursuant to 18 U.S.C. § 982(a)(2)(A) and (a)(2)(B).

a. All assets, including any funds, securities, and cryptocurrencies or other digital assets, stored in, accessible via, and/or on deposit in Robinhood Markets, Inc. account number 895707297, held in the name of S.H.;

b. All assets, including any funds, securities, and cryptocurrencies or other digital assets, formerly stored in, accessible via, and/or on deposit in Robinhood Markets, Inc. account number 963802624, held in the name of A.F., approximately $69,535.12

[1] The United States determined that the Defendant's Factual Proffer contains a scrivener's error. The Factual Proffer incorrectly lists "3481" as the last four digits of an account that was used by the Defendant. *See* Factual Proffer 4, ECF No. 37. The correct account number ends in "3482" as listed herein.

of which is currently held by the State of Michigan under property identification number 3083441850;

c. All assets, including any funds, securities, and cryptocurrencies or other digital assets, formerly stored in, accessible via, and/or on deposit in Robinhood Markets, Inc. account number 733596985, held in the name of J.K., approximately $40,579.71 of which is currently held by the State of Michigan under property identification number 30834359;

d. All assets, including any funds, securities, and cryptocurrencies or other digital assets, formerly stored in, accessible via, and/or on deposit in Robinhood Markets, Inc. account number 612984559, held in the name of A.G., approximately $155,391.29 of which is currently held by the State of Michigan under property identification number 30814411;

e. All assets, including any funds, securities, and cryptocurrencies or other digital assets, formerly stored in, accessible via, and/or on deposit in Robinhood Markets, Inc. account number 566568309, held in the name of C.G., approximately $98,357.99 of which is currently held by the State of Michigan under property identification number 30850593;

f. All assets, including any funds, securities, and cryptocurrencies or other digital assets, stored in, accessible via, and/or on deposit in Robinhood Markets, Inc. account number 430883090, held in the name of C.R.;

g. All assets, including any funds, securities, and cryptocurrencies or other digital assets, formerly stored in, accessible via, and/or on deposit in Robinhood Markets, Inc. account number 881031496, held in the name of K.L., approximately $70,295.37 of which is currently held by the State of Michigan under property identification number 30833469;

h. All assets, including any funds, securities, and cryptocurrencies or other digital assets, stored in, accessible via, and/or on deposit in Robinhood Markets, Inc. account number 706188737, held in the name of G.R.;

i. All assets, including any funds, securities, and cryptocurrencies or other digital assets, formerly stored in, accessible via, and/or on deposit in Robinhood Markets, Inc. account number 616320958, held in the name of M.M., approximately $87,499.72 of which is currently held by the State of Florida;

j. All assets, including any funds, securities, and cryptocurrencies or other digital assets, stored in, accessible via, and/or on deposit in Robinhood Markets, Inc. account number 769545740, held in the name of R.B.;

k. All assets, including any funds, securities, and cryptocurrencies or other digital assets, formerly stored in, accessible via, and/or on deposit in Robinhood Markets,

Inc. account number 712854165, held in the name of S.A., approximately $65,667.08 of which is currently held by the State of Michigan under property identification number 30823008;

l. All assets, including any funds, securities, and cryptocurrencies or other digital assets, formerly stored in, accessible via, and/or on deposit in Robinhood Markets, Inc. account number 440859379, held in the name of B.P.;

m. All funds formerly on deposit in Wells Fargo Bank NA account number 3313637625, held in the name of T.H.; and

n. All funds formerly on deposit in Wells Fargo Bank NA account number 7171407062, held in the name of T.T.

Accordingly, based on the foregoing, the evidence in the record, and for good cause shown, the Motion is **GRANTED**, and it is hereby **ORDERED** that:

1. Pursuant to 18 U.S.C. § 982(a)(2)(A) and (a)(2)(B), and the procedures set forth in 21 U.S.C. § 853 and Rule 32.2 of the Federal Rules of Criminal Procedure, a forfeiture money judgment in the amount of $1,083,340 in U.S. currency is hereby entered against the Defendant.

2. Pursuant to 18 U.S.C. § 982(a)(2)(A) and (a)(2)(B), the following specific property is hereby forfeited and vested in the United States of America:

a. All assets, including any funds, securities, and cryptocurrencies or other digital assets, stored in, accessible via, and/or on deposit in Robinhood Markets, Inc. account number 895707297, held in the name of S.H.;

b. All assets, including any funds, securities, and cryptocurrencies or other digital assets, formerly stored in, accessible via, and/or on deposit in Robinhood Markets, Inc. account number 963802624, held in the name of A.F., approximately $69,535.12 of which is currently held by the State of Michigan under property identification number 3083441850;

c. All assets, including any funds, securities, and cryptocurrencies or other digital assets, formerly stored in, accessible via, and/or on deposit in Robinhood Markets, Inc. account number 733596985, held in the name of J.K., approximately $40,579.71 of which is currently held by the State of Michigan under property identification number 30834359;

d. All assets, including any funds, securities, and cryptocurrencies or other digital assets, formerly stored in, accessible via, and/or on deposit in

Robinhood Markets, Inc. account number 612984559, held in the name of A.G., approximately $155,391.29 of which is currently held by the State of Michigan under property identification number 30814411;

e. All assets, including any funds, securities, and cryptocurrencies or other digital assets, formerly stored in, accessible via, and/or on deposit in Robinhood Markets, Inc. account number 566568309, held in the name of C.G., approximately $98,357.99 of which is currently held by the State of Michigan under property identification number 30850593;

f. All assets, including any funds, securities, and cryptocurrencies or other digital assets, stored in, accessible via, and/or on deposit in Robinhood Markets, Inc. account number 430883090, held in the name of C.R.;

g. All assets, including any funds, securities, and cryptocurrencies or other digital assets, formerly stored in, accessible via, and/or on deposit in Robinhood Markets, Inc. account number 881031496, held in the name of K.L., approximately $70,295.37 of which is currently held by the State of Michigan under property identification number 30833469;

h. All assets, including any funds, securities, and cryptocurrencies or other digital assets, stored in, accessible via, and/or on deposit in Robinhood Markets, Inc. account number 706188737, held in the name of G.R.;

i. All assets, including any funds, securities, and cryptocurrencies or other digital assets, formerly stored in, accessible via, and/or on deposit in Robinhood Markets, Inc. account number 616320958, held in the name of M.M., approximately $87,499.72 of which is currently held by the State of Florida;

j. All assets, including any funds, securities, and cryptocurrencies or other digital assets, stored in, accessible via, and/or on deposit in Robinhood Markets, Inc. account number 769545740, held in the name of R.B.;

k. All assets, including any funds, securities, and cryptocurrencies or other digital assets, formerly stored in, accessible via, and/or on deposit in Robinhood Markets, Inc. account number 712854165, held in the name of S.A., approximately $65,667.08 of which is currently held by the State of Michigan under property identification number 30823008;

l. All assets, including any funds, securities, and cryptocurrencies or other digital assets, formerly stored in, accessible via, and/or on deposit in Robinhood Markets, Inc. account number 440859379, held in the name of B.P.;

m. All funds formerly on deposit in Wells Fargo Bank NA account number 3313637625, held in the name of T.H.; and

n. All funds formerly on deposit in Wells Fargo Bank NA account number 7171407062, held in the name of T.T.

3. Any duly authorized law enforcement agency may seize and take possession of the forfeited property according to law.

4. The United States shall send and publish notice of the forfeiture in accordance with Rule 32.2(b)(6) of the Federal Rules of Criminal Procedure and 21 U.S.C. § 853(n).

5. The United States is authorized to conduct any discovery that might be necessary to identify, locate, or dispose of forfeited property, and to resolve any third-party petition, pursuant to Rule 32.2(b)(3), (c)(1)(B) of the Federal Rules of Criminal Procedure and 21 U.S.C. § 853(m).

6. Pursuant to Rule 32.2(b)(4) of the Federal Rules of Criminal Procedure, this Order is final as to the Defendant.

7. The Court shall retain jurisdiction in this matter for the purpose of enforcing this Order, and pursuant to Rule 32.2(e)(1) of the Federal Rules of Criminal Procedure, shall amend this Order, or enter other orders as necessary, to forfeit additional specific property when identified.

It is further **ORDERED** that upon adjudication of all third-party interests, if any, the Court will enter a final order of forfeiture as to the property in which all interests will be addressed. Upon notice from the United States that no claims have been filed within 60 days of the first day of publication or within 30 days of receipt of notice, whichever is earlier, then, pursuant to Rule 32.2(c)(2) of the Federal Rules of Criminal Procedure and 21 U.S.C. § 853(n)(7), this Order shall become a Final Order of Forfeiture and any duly authorized law enforcement agency shall dispose

of the property in accordance with applicable law.

DONE AND ORDERED in Fort Lauderdale, Florida, this 5 day of ~~February~~ March 2025.

WILLIAM P. DIMITROULEAS
UNITED STATES DISTRICT JUDGE