UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 24-60168-CR-DIMITROULEAS/HUNT(s)
18 U.S.C. § 1344
18 U.S.C. § 1029(a)(3)
18 U.S.C. § 1028A(a)(1)
18 U.S.C. § 982(a)(2)(A)
18 U.S.C. § 982(a)(2)(B)
18 U.S.C. § 1029(c)(1)(C)

UNITED STATES OF AMERICA

vs.

CONRAD BRANDON BERNARD,

Defendant.
______________________________/

SUPERSEDING INFORMATION

The United States Attorney charges that:

GENERAL ALLEGATIONS

At all times relevant to this Superseding Information:

Overview of the COVID-19 Economic Injury Disaster Loan

1. In or around March 2020, the President declared the ongoing Coronovirus Disease 2019 (COVID-19) pandemic of sufficient severity and magnitude to warrant an emergency declaration for all states, tribes, territories, and the District of Columbia pursuant to section 501(b) of the Robert T. Stafford Disaster Relief and Emergency Assistance Act, 42 U.S.C. §§ 5121-5207. The President also signed into law the Coronavirus Aid, Relief, and Economic Security (CARES) Act and the Families First Coronavirus Response Act.

2. 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. 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, which was declared a nationwide disaster by the President on or about March 13, 2020.

3. One government response to the COVID-19 outbreak was an expansion of an existing disaster-related program—the Economic Injury Disaster Loan (EIDL)—to provide for loan assistance (including $10,000 advances) for small businesses and other eligible entities for loans. Intially, the loans were capped at $150,000. Over the course of the program the maximum eligible loan amount was increased several times. Beginning April 6, 2021 the maximum loan amount was increased from $150,000 to $500,000 and on September 8, 2021, the loan cap was increased from $500,000 to $2 million.

4. EIDL funds were issued directly from the United States Treasury, and applicants applied through the SBA via an online portal and application. To obtain an EIDL and advance, a qualifying business was required to submit an application to the SBA and provide information about its operations, such as the number of employees, gross revenue for the 12-month period preceding the disaster, and cost of goods sold in the 12-month period preceding the disaster. In the case of EIDLs for COVID-19 relief, the 12-month period was the period preceding January 31, 2020. For a business to be eligible for an EIDL, the business must have been in operation before February 1, 2020. Applicants electronically certified that the information provided was accurate and were warned that any false statement or misrepresentation to the SBA or any misapplication of loan proceeds may result in sanctions, including criminal penalties. Applicants also completed loan agreements with the SBA.

5. All applications submitted on July 11, 2020, or after were handled by an SBA contractor with servers located in Des Moines, Iowa. Prior to July 11, 2020, EIDL applications were submitted through three different servers, located in Boydton, VA, West Des Moines, IA, or Quincy, WA. Approval of a loan application and the amount of a loan was based, in part, on the information provided on the application about the number of employees, gross revenue, and cost of goods, as described above. The EIDL loan applications required minimal documentation and information from small businesses to process the loan for approval.

6. Once an SBA EIDL application was approved, the SBA's Denver Finance Center, located in Denver, Colorado, created payment files and authorized payments of the EIDL funds based on those applications. The disbursement of the EIDL funds were transmitted by the Financial Management System (FMS) to the Treasury and then to the recipient's bank account. The primary server for the FMS is in Sterling, VA. Upon approval of an application for an EIDL or advance, SBA would disburse the funds. EIDL loan proceeds were permitted to be used for payroll expenses, sick leave, production costs, and business obligations, such as debts, rent, and mortgage payments.

Overview of Unemployment Insurance

7. The U.S. Department of Labor's unemployment insurance programs provide unemployment benefits to eligible workers who become unemployed through no fault of their own and meet certain other eligibility requirements. Unemployment insurance is a joint state-federal program that provides cash benefits to eligible workers. Each state administers a separate unemployment insurance program, but all states follow the same guidelines established by federal law.

8. To receive unemployment insurance benefits, an individual generally files a claim with the unemployment insurance program in the state where that individual worked. When a claim is filed, an applicant will be asked for certain information including the applicant's personal identification information, such as name, date of birth, and social security number.

Financial Institutions Used to Commit Fraud

9. TD Bank, N.A. ("TD Bank") was a financial institution with deposits insured by the Federal Deposit Insurance Corporation.

10. Wells Fargo Bank NA ("Wells Fargo") was a financial institution with deposits insured by the Federal Deposit Insurance Corporation.

11. Robinhood Markets, Inc. ("Robinhood") was a financial technology company offering online brokerage services to customers.

12. TD Bank and Wells Fargo allowed individuals to open bank accounts for the purpose of conducting banking activities such as making deposits, transferring funds, withdrawing funds, and using bank issued cards to withdraw funds.

COUNTS 1-6
Bank Fraud
(18 U.S.C. § 1344)

13. Paragraphs 1 through 12 within this superseding information are re-alleged and incorporated by reference as though fully set forth herein.

14. Beginning at least as early as in or around May 2020, the exact date being unknown, through in or about December 2022, in Broward County, in the Southern District of Florida and elsewhere, the defendant,

CONRAD BRANDON BERNARD,

did knowingly and with the intent to defraud, execute, and cause the execution of a scheme and artifice to defraud a financial institution, that is, TD Bank and Wells Fargo, which scheme and artifice would employ a material falsehood, and to knowingly and with the intent to defraud, execute, and cause the execution of a scheme and artifice to obtain moneys, funds, credits, assets, and other property owned by, and under the custody and control of said financial institutions, by means of materially false and fraudulent pretenses, representations and promises relating to a material fact, in violation of Title 18, United States Code, Section 1344(1) and (2).

Purpose of the Scheme and Artifice

15. It was the purpose of the scheme and artifice for the defendant to unlawfully enrich himself by using the identity and personal identification information ("PII") of individuals, such as their name, date of birth, and social security number, without their knowledge or consent to create accounts at Wells Fargo, TD Bank, and Robinhood and then to 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.

The Scheme and Artifice

The manner and means by which the defendant sought to accomplish the purpose of the scheme and artifice included, among others, the following:

EIDL Fraud Using Wells Fargo Bank Accounts

Misolyn Farm EIDL

16. On or about July 1, 2020, the defendant caused the SBA to receive an EIDL application for "Misolyn Farm, LLC," using the name and PII of L.E. to apply for the loan without L.E.'s knowledge or consent. The SBA approved the Misolyn Farm EIDL application, and, on July 27, 2020, the SBA transferred $88,400 into a Wells Fargo account ending in 5375, which was held in the name of another individual, "T.D.," and opened using T.D.'s PII without T.D.'s knowledge or consent. The defendant controlled the Wells Fargo account ending in 5375 by fraudulently impersonating T.D.

17. On or about August 4, 2020, the defendant transferred $50,000 from the Wells Fargo account ending in 5375 to a Robinhood account ending in 7297, which was held in the name of S.H. and opened using S.H.'s PII without S.H.'s knowledge or consent. On or around August 6, 2020, the defendant made another transfer of $35,000 from the Wells Fargo account ending in 5375 to the Robinhood account ending in 7297. The defendant controlled the Robinhood account ending in 7297 by fraudulently impersonating S.H.

A.P. EIDL

18. On or about July 1, 2020, the defendant caused the SBA to receive an EIDL application for "A.P., Sole Proprietor" using the name and PII of A.P. to apply for the loan without A.P.'s knowledge or consent. The SBA approved the A.P. EIDL application, and, on or about

July 23, 2020, the SBA transferred $84,000 to a Wells Fargo account ending in 4245, which was held in the name of R.B. and opened using R.B.'s PII without R.B.'s knowledge or consent. The defendant controlled the Wells Fargo account ending in 4245 by fraudulently impersonating R.B.

19. On or about July 28, July 30, August 7, and a second time on August 7, 2020 the defendant transferred $50,000, $30,000, $2,000, and $2,500, respectively, from the Wells Fargo account ending in 4245 to a Robinhood account ending in 9379, which was opened using the name and PII of B.P. without B.P.'s knowledge or consent. The defendant controlled the Robinhood account ending in 9379 by fraudulently impersonating B.P.

Y.A. EIDL

20. On or about July 23, 2020, the defendant caused the SBA to receive an EIDL application for "Y.A., Sole Proprietor" using the name and PII of Y.A. to apply for the loan without Y.A.'s knowledge or consent. The SBA approved the Y.A. EIDL application, and, on or about August 7, 2020, the SBA transferred $64,500 to the Wells Fargo account ending in 5268, which was held in the name of T.B. and opened using T.B.'s PII without T.B.'s knowledge or consent. The defendant controlled Wells Fargo account ending in 5268 by fraudulently impersonating T.B.

21. On or about August 11, 2020, the defendant transferred $50,000 from the Wells Fargo account ending in 5268 to a Robinhood account ending in 5740, which was held in the name of R.B. and opened using R.B.'s PII without R.B.'s knowledge or consent. The defendant controlled Robinhood account ending in 5740 by fraudulently impersonating R.B.

J.A. EIDL

22. On or about July 23, 2020, the defendant caused the SBA to receive an EIDL application for "J.A., Sole Proprietor" using the name and PII of J.A. to apply for the loan without J.A.'s knowledge or consent. The SBA approved the J.A. EIDL application, and, on or about

August 2, 2020, the SBA transferred $81,900 to the Wells Fargo account ending in 3482, which was held in the name of J.B. and opened using J.B.'s PII without J.B.'s consent or knowledge. The defendant controlled the Wells Fargo account ending in 3482 by fraudulently impersonating J.B.

23. On or about August 2, 2020, the defendant transferred $50,000 from the Wells Fargo 3482 to a Robinhood account ending in 2462, which was held in the name of A.F. and opened using A.F.'s PII without A.F.'s knowledge or consent.

24. On or about August 2, 2020, the defendant transferred $31,500 from the Wells Fargo account ending in 3482 to the Wells Fargo account ending in 2318, which was also held in the name of J.B. and opened using J.B.'s PII without J.B.'s knowledge or consent. The defendant controlled the Wells Fargo account ending in 2318 by fraudulently impersonating J.B.

25. On or about August 2, 2020, the defendant transferred $31,000 from the Wells Fargo account ending in 2318 to a Robinhood account ending in 6985, which was held in the name of J.K. and opened using J.K.'s PII without J.K.'s knowledge or consent. The defendant controlled Robinhood account ending in 6985 by fraudulently impersonating J.K.

R.K. EIDL

26. On or about July 25, 2020, the defendant caused the SBA to receive an EIDL application for "R.K., Sole Proprietor" using the name and PII of R.K. to apply for the loan without R.K.'s knowledge or consent. The SBA approved the R.K. EIDL application, and, on or about August 7, 2020, the SBA transferred $70,100 to the Wells Fargo account ending in 9488, which was held in the name of R.K. and opened using R.K.'s PII without R.K.'s knowledge or consent. The defendant controlled the Wells Fargo account ending in 9488 by fraudulently impersonating R.K.

27. On or about August 12, 2020, the defendant transferred $50,000 from the Wells Fargo account ending in 9488 to a Robinhood account ending in 4165, which was held in the name of S.A. and opened using S.A.'s PII without S.A.'s knowledge or consent. The defendant controlled the Robinhood account ending in 4165 by fraudulently impersonating S.A.

C.C. EIDL

28. On or about August 2, 2020, the defendant caused the SBA to receive an EIDL application for "C.C., Sole Proprietor" using the name and PII of C.C. to apply for the EIDL ("C.C. EIDL") without C.C.'s knowledge or consent. The SBA approved the C.C. EIDL application, and, on or about August 2, 2020, the SBA transferred $85,100 to Wells Fargo account ending in 9990, which was held in the name of E.P. and opened using E.P.'s PII without E.P.'s knowledge or consent. The defendant controlled Wells Fargo account ending in 9990 by fraudulently impersonating E.P.

29. On or about August 10, 2020, the defendant transferred $50,000 from Wells Fargo account ending in 9990 to a Robinhood account ending in 1496, which was held in the name of K.L. and opened using K.L.'s PII without K.L.'s knowledge or consent. The defendant controlled Robinhood account ending in 1496 by fraudulently impersonating K.L.

E.P. EIDL

30. On August 2, 2020, the defendant caused the SBA to receive an EIDL application for "E.P., Sole Proprietor" using the name and PII of E.P. to apply for the loan without E.P.'s knowledge or consent. The SBA approved the E.P. EIDL application, and, on or about August 2, 2020, the SBA transferred $60,600 to the Wells Fargo account ending in 2894, which was held in the name of E.P. and opened using E.P.'s PII without E.P.'s knowledge or consent. The defendant controlled the Wells Fargo account ending in 2894 by fraudulently impersonating E.P.

31. On or about August 10, 2020, the defendant transferred $50,000 from the Wells Fargo account ending in 2894 to a Robinhood account ending in 3090, which was held in the name of C.R. and opened using C.R.'s PII without C.R.'s knowledge or consent. On or about August 10, 2020, the defendant transferred $35,000 from the Wells Fargo account ending in 9990 to the Wells Fargo account ending in 2894. On or about August 24, 2020, the defendant transferred $35,000 to Robinhood account ending in 3090.

L.F. EIDL

32. On or about August 2, 2020, the defendant caused the SBA to receive an EIDL application for "L.F., Sole Proprietor" using the identity and PII of L.F. to apply for the loan without L.F.'s knowledge or consent. The SBA approved the L.F. EIDL application, and, on or about August 4, 2020, the SBA transferred $67,900 to the Wells Fargo account ending in 4172, which was held in the name of T.H. and opened using T.H.'s PII without T.H.'s knowledge or consent. The defendant controlled the Wells Fargo account ending in 4172 by fraudulently impersonating T.H. On or about August 5, 2020, the defendant transferred $9,000 from the Wells Fargo account ending in 4172 to the Wells Fargo account ending in 7625, which was also held in the name of T.H. and opened using T.H.'s PII without T.H.'s knowledge or consent. The defendant controlled the Wells Fargo account ending in 7625 by fraudulently impersonating T.H.

L.H. EIDL

33. On or about August 2, 2020, the defendant caused the SBA to receive an EIDL application for "L.H., Sole Proprietor" using the identity and PII of L.H. to apply for the loan without L.H.'s knowledge or consent. The SBA approved the L.H. EIDL application, and, on or about September 24, 2020, the SBA transferred $55,300 to the Wells Fargo account ending in 6550, which was held in the name of T.T. and opened using T.T.'s PII without T.T.'s knowledge

or consent. The defendant controlled the Wells Fargo account ending in 6550 by fraudulently impersonating T.T. On or about September 24, 2020, the defendant transferred $8,000 from the Wells Fargo account ending in 6550 to a Wells Fargo account ending in 7062, which was also held in the name of T.T. and opened using T.T.'s PII without T.T.'s knowledge or consent. The defendant controlled the Wells Fargo account ending in 7062 by fraudulently impersonating T.T.

S.N. EIDL

34. On or about August 3, 2020, the defendant caused the SBA to receive an EIDL application for "S.N., Sole Proprietor" using the identity and PII of S.N. to apply for the loan without S.N.'s knowledge or consent. The SBA approved the S.N. EIDL application, and, on or about August 5, 2020, the SBA transferred $57,400 to the Wells Fargo account ending in 3644, which was held in the name of S.N. and opened using S.N.'s PII without S.N.'s consent or knowledge. The defendant controlled the Wells Fargo account ending in 3644 by fraudulently impersonating S.N.

35. On or about August 6, August 12, and August 26, 2020, the defendant transferred $50,000, $15,000, and $2,700, respectively, from the Wells Fargo account ending in 3644 to a Robinhood account ending in 0958, which was held in the name of M.M. and opened using M.M.'s PII without M.M.'s knowledge or consent. The defendant controlled the Robinhood account ending in 0958 by fraudulently impersonating M.M.

S.C. EIDL

36. On or about August 4, 2020, the defendant caused the SBA to receive an EIDL application for "S.C., Sole Proprietor" using the identity and PII of S.C. to apply for the loan without S.C.'s knowledge or consent. The SBA approved the S.C. EIDL application, and, on or about August 5, 2020, the SBA transferred $76,900 to the Wells Fargo account ending in 0406,

which was held in the name of S.C. and opened using S.C.'s PII without S.C.'s consent or knowledge. The defendant controlled the Wells Fargo account ending in 0406 by fraudulently impersonating S.C.

37. On or about August 11 and August 12, 2020, the defendant transferred $50,000 and $25,000, respectively, from the Wells Fargo account ending in 0406 to a Robinhood account ending in 8309, which was held in the name of C.G. and opened using C.G.'s PII without C.G.'s knowledge or consent. The defendant controlled the Robinhood account ending in 8309 by fraudulently impersonating C.G.

FIRST E.C. EIDL

38. On or about August 4, 2020, the defendant caused the SBA to receive an EIDL application for "E.C., Sole Proprietor" using the identity and PII of E.C. to apply for the loan without E.C.'s knowledge or consent. The SBA approved the first E.C. EIDL application, and, on or about August 5, 2020, the SBA transferred $53,400 to the Wells Fargo account ending in 1824, which was held in the name of E.C. and opened using E.C.'s PII without E.C.'s consent or knowledge. The defendant controlled the Wells Fargo account ending in 1824 by fraudulently impersonating E.C.

SECOND E.C. EIDL

39. On or about August 4, 2020, the defendant caused the SBA to receive a second EIDL application for "E.C., Sole Proprietor" using the identity and PII of E.C. to apply for the loan without E.C.'s knowledge or consent. The SBA approved the second E.C. EIDL application, and, on or about August 5, 2020, the SBA transferred $76,000 to Wells Fargo account ending in 6920, which was held in the name of E.C. and opened using E.C.'s PII without E.C.'s knowledge or consent. The defendant controlled the Wells Fargo account ending in 6920 by

fraudulently impersonating E.C. On or about August 10 and August 21, 2020, the defendant transferred $49,000 and $26,000, respectively, from the Wells Fargo account ending in 6920 to the Wells Fargo account ending in 1824. The defendant controlled the Wells Fargo account ending in 1824 by fraudulently impersonating E.C.

40. On or about August 10, August 11, and August 24, 2020, the defendant transferred $50,000, $50,000, and $20,000 from the Wells Fargo account ending in 1824 to a Robinhood account ending in 4559, which was held in the name of A.G. and opened using A.G.'s PII without A.G.'s knowledge or consent. The defendant controlled the Robinhood account ending in 4559 by fraudulently impersonating A.G.

W.H. EIDL

41. On or about August 4, 2020, the defendant caused the SBA to receive an EIDL application for "W.H., Sole Proprietor" using the identity and PII of W.H. to apply for the loan without W.H.'s knowledge or consent. The SBA approved the W.H. EIDL application, and, on or about August 12, 2020, the SBA transferred $67,400 to the Wells Fargo account ending 9545, which was held in the name of W.H. and opened using W.H.'s PII without W.H.'s knowledge or consent. The defendant controlled the Wells Fargo account ending in 9545 by fraudulently impersonating W.H.

42. On or about August 13, 2020, the defendant transferred $50,000 from the Wells Fargo account ending in 9545 to a Robinhood account ending in 8737, which was held in the name of G.R. and opened using G.R.'s PII without G.R.'s knowledge or consent. The defendant controlled the Robinhood account ending in 8737 by fraudulently impersonating G.R.

Unemployment Fraud Using Wells Fargo Bank Accounts

43. The defendant possessed the PII of R.B., including R.B.'s name, date of birth, and social security number without the knowledge, authorization, or consent of R.B.

44. The defendant used the personal identification information of R.B. to open and then control the Wells Fargo account ending in 4245 and the Wells Fargo account ending in 7786 without the knowledge, authorization, or consent of R.B.

45. The defendant used these Wells Fargo account to receive fraudulent payments including fraudulent payments of unemployment benefits. Beginning on or about June 4, 2020 through on or about July 16, 2020, the Wells Fargo account ending in 4245 and the Wells Fargo account ending in 7786 received approximately $45,564 in multiple fraudulent payments of unemployment benefits for individuals whose names and PII were used to apply for the unemployment benefits without their knowledge or consent.

Identification Fraud Using TD Bank Accounts

46. The defendant possessed the personal identification information of D.E., including D.E.'s name, date of birth, and social security number without the knowledge, authorization, or consent of D.E. D.E.'s personal identification information was used to open, without D.E.'s authorization, two TD Bank accounts ending in 5429 and 3727.

47. The defendant possessed a TD Bank debit card ending in 3854 and bearing the name of D.E. The TD Bank debit card ending in 3854 was linked and authorized to withdraw funds from, the TD Bank account ending in 5429 and the TD Bank account ending in 3737. D.E. did not authorize the use of D.E.'s personal identification information to open or to use the TD Bank accounts ending in 5429 and 3727 or the TD Bank debit card ending in 3854.

48. The defendant possessed the personal identification of U.S., including U.S.' name, date of birth, and social security number without the knowledge, authorization, or consent of U.S. U.S.' identification was used to open, without U.S.' authorization, the TD Bank account ending in 9833.

49. The defendant possessed a TD Bank debit card ending in 9603 and bearing the name of U.S. The TD Bank debit card ending in 9603 was linked and authorized to withdraw funds from the TD Bank account ending in 9833. U.S. did not authorize the use of U.S.' personal identification information to open or use the TD Bank account ending in 9833 or TD Bank debit card ending in 9603.

Execution of the Scheme and Artifice

50. On or about the dates listed as to each count below, the defendant did knowingly and with the intent to defraud, execute, and cause the execution of a scheme and artifice to defraud a financial institution, namely Wells Fargo and TD Bank, which scheme and artifice would employ a material falsehood, and did knowingly and with the intent to defraud, execute, and cause the execution of a scheme and artifice to obtain moneys, funds, credit assets, and other property owned by, and under the custody and control of a financial institution, by means of materially false and fraudulent pretenses, representations and promises relating to a material fact, as specified below:

Count	Approximate Transaction Date	Transaction	Account that was Involved	Approximate Amount Involved
1	08/02/2020	Fund Transfer from Wells Fargo Account ending in 3482 into Robinhood Account ending in 2624	Wells Fargo Account ending in 3482, held in the name of J.B.	$50,000
2	08/07/2020	Fund Transfer from Wells Fargo Account ending in 5268 into Robinhood Account ending in 5740	Wells Fargo Account ending in 5268, held in the name of T.B.	$50,000
3	07/28/2020	Fund Transfer from Wells Fargo Account ending in 4245 into Robinhood Account ending in 9379	Wells Fargo Account ending in 4245, held in the name of R.B.	$50,000
4	07/29/2020	Fund Transfer from Wells Fargo Account ending in 7786 into Wells Fargo Account ending in 4245	Wells Fargo Account ending in 7786, held in the name of R.B.	$5,800
5	04/9/2022	ATM Withdrawal	TD Bank Account ending in 5429, held in the name of D.E.	$1,000
6	07/05/2022	ATM Withdrawal	TD Bank Account ending in 9833, held in the name of U.S.	$1,003

in violation of Title 18, United States Code, Section 1344 (1) and (2).

COUNT 7
Possession of Fifteen or More Unauthorized Access Devices
(18 U.S.C. § 1029(a)(3))

51. On or about May 13, 2022, in Broward County, in the Southern District of Florida, the defendant,

CONRAD BRANDON BERNARD,

did knowingly, and with intent to defraud, possess fifteen (15) or more counterfeit access devices and unauthorized access devices, that is, names, dates of birth, social security numbers, state driver's license numbers, United States Passport Card Numbers, and bank debit card numbers, said conduct affecting interstate and foreign commerce, in violation of Title 18, United States Code, Section 1029(a)(3).

COUNTS 8-9
Aggravated Identity Theft
(18 U.S.C. § 1028A(a)(1))

52. Paragraphs 46 through 49 and Paragraph 51 within this Superseding Information are re-alleged and incorporated by reference as though fully set forth herein.

53. On or about the dates listed in the table below, in Broward County, in the Southern District of Florida, and elsewhere, the defendant,

CONRAD BRANDON BERNARD,

during and in relation to a felony violation of Title 18, United States Code, Section 1029(a)(3), that is, knowingly, and with intent to defraud, possess fifteen (15) or more unauthorized access devices, that is, names, dates of birth, social security numbers, state driver's license numbers, credit card numbers, and debit card numbers issued to other persons, said conduct affecting interstate and foreign commerce, in violation of Title 18, United States Code, Section 1029(a)(3) as charged in Count 7, did knowingly transfer, possess, and use, without lawful authority, the means of identification of another person, as specified in each count below:

COUNT	APPROXIMATE DATE	MEANS OF IDENTIFICATION
8	05/13/2022	Name, Date of Birth, and Social Security Number of U.S.
9	05/13/2022	Name, Date of Birth, and Social Security Number of J.B.

in violation of Title 18, United States Code, Section 1028A(a)(1) and Title 18, United States Code, Section 2.

FORFEITURE ALLEGATIONS

1. The allegations of the Superseding Information are re-alleged and by this reference fully incorporated herein for the purpose of alleging forfeiture to the United States of certain property in which the defendant, **CONRAD BRANDON BERNARD**, has an interest.

2. Upon conviction of a violation of Title 18, United States Code, Section 1029, as alleged in this Superseding Information, 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 Title 18, United States Code, Section 982(a)(2)(B); and (b) any personal property used, or intended to be used, to commit such offense, pursuant to Title 18, United States Code, Section 1029(c)(1)(C).

3. Upon conviction of a violation of Title 18, United States Code, Section 1344, as alleged in this Superseding Information, the defendant shall forfeit to the United States any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of such offenses and fraud scheme, pursuant to Title 18, United States Code, Section 982(a)(2)(A).

4. The property subject to forfeiture includes, but is not limited to:

   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.

5. If any of the property subject to forfeiture, 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 the forfeiture of substitute property under the provisions of Title 21, United States Code, Section 853(p).

All pursuant to Title 18, United States Code, Sections 982(a)(2)(A), 982(a)(2)(B), and 1029(c)(1)(C), and the procedures set forth at Title 21, United States Code, Section 853, as incorporated by Title 18, United States Code, Sections 982(b)(1) and 1029(c)(2), and Title 28, United States Code, Section 2461(c).

BRUCE D. BROWN

FOR MARKENZY LAPOINTE
UNITED STATES ATTORNEY

DERIC ZACCA
ASSISTANT UNITED STATES ATTORNEY

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

UNITED STATES OF AMERICA

v.

CONRAD BRANDON BERNARD,

______________________________/

Defendant.

CASE NO.: 24-CR-60168-WPD(s)

CERTIFICATE OF TRIAL ATTORNEY

Court Division (select one)

☐ Miami ☐ Key West ☐ FTP
☒ FTL ☐ WPB

Superseding Case Information:
New Defendant(s) (Yes or No) No
Number of New Defendants ____
Total number of new counts ____

I do hereby certify that:

1. I have carefully considered the allegations of the indictment, the number of defendants, the number of probable witnesses and the legal complexities of the Indictment/Information attached hereto.
2. I am aware that the information supplied on this statement will be relied upon by the Judges of this Court in setting their calendars and scheduling criminal trials under the mandate of the Speedy Trial Act, Title 28 U.S.C. §3161.
3. Interpreter: (Yes or No) No
   List language and/or dialect: English
4. This case will take 0 days for the parties to try.
5. Please check appropriate category and type of offense listed below:

(Check only one)		(Check only one)
I	☒ 0 to 5 days	☐ Petty
II	☐ 6 to 10 days	☐ Minor
III	☐ 11 to 20 days	☐ Misdemeanor
IV	☐ 21 to 60 days	☒ Felony
V	☐ 61 days and over	

6. Has this case been previously filed in this District Court? (Yes or No) Yes
   If yes, Judge William D. Dimitrouleas Case No. 24-CR-60168-WPD
7. Has a complaint been filed in this matter? (Yes or No) No
   If yes, Magistrate Case No. ____________
8. Does this case relate to a previously filed matter in this District Court? (Yes or No) No
   If yes, Judge ____________ Case No. ____________
9. Defendant(s) in federal custody as of September 4, 2024
10. Defendant(s) in state custody as of ____________
11. Rule 20 from the ________ District of ____________
12. Is this a potential death penalty case? (Yes or No) No
13. Does this case originate from a matter pending in the Northern Region of the U.S. Attorney's Office prior to August 8, 2014 (Mag. Judge Shaniek Maynard? (Yes or No) No
14. Does this case originate from a matter pending in the Central Region of the U.S. Attorney's Office prior to October 3, 2019 (Mag. Judge Jared Strauss? (Yes or No) No
15. Did this matter involve the participation of or consultation with Magistrate Judge Eduardo I. Sanchez during his tenure at the U.S. Attorney's Office, which concluded on January 22, 2023? No
16. Did this matter involve the participation of or consultation with now Magistrate Judge Marta Fulgueira Elfenbein during her tenure at the U.S. Attorney's Office, which concluded on March 5, 2024? No

By: ____________________
Deric Zacca
Assistant United States Attorney
FL Bar No. 151378

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: Conrad Brandon Bernard

Case No: 24-CR-60168-WPD(s)

Count #: 1-6

Bank Fraud, in violation of Title 18, United States Code, Section 1344

* **Max. Term of Imprisonment:** 30 years
* **Mandatory Min. Term of Imprisonment (if applicable): N/A**
* **Max. Supervised Release: 5** years
* **Max. Fine:** $1,000,000

Count #: 7

Possession of Fifteen or More Unauthorized Access Devices, in violation of Title 18, United States Code, Section 1029(a)(3)

* **Max. Term of Imprisonment:** 10 years
* **Mandatory Min. Term of Imprisonment (if applicable):** N/A
* **Max. Supervised Release:** 3 years
* **Max. Fine:** $250,000

Counts #: 8- 9

Aggravated Identity Theft, in violation of Title 18, United States Code, Section 1029A(a)(1)

* **Max. Term of Imprisonment:** 2 years
* **Mandatory Min. Term of Imprisonment (if applicable):** 2 years, consecutive to any other sentence
* **Max. Supervised Release:** 2 years, consecutive to any other sentence
* **Max. Fine:** $250,000

***Refers only to possible term of incarceration, supervised release and fines. It does not include restitution, special assessments, parole terms, or forfeitures that may be applicable.**

AO 455 (Rev. 01/09) Waiver of an Indictment

UNITED STATES DISTRICT COURT

for the

Southern District of Florida

United States of America v. CONRAD BRANDON BERNARD, *Defendant*	Case No. 24-CR-60168-WPD(s)

WAIVER OF AN INDICTMENT

I understand that I have been accused of one or more offenses punishable by imprisonment for more than one year. I was advised in open court of my rights and the nature of the proposed charges against me.

After receiving this advice, I waive my right to prosecution by indictment and consent to prosecution by information.

Date: ________________

____
Defendant's signature

____
Signature of defendant's attorney

____
Printed name of defendant's attorney

____
Judge's signature

____
Judge's printed name and title