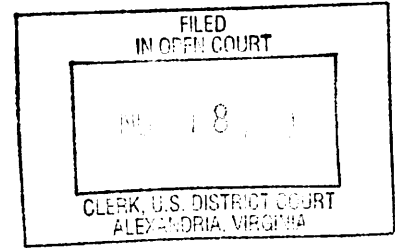


IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF VIRGINIA  
Alexandria Division



|                          |   |   |
|--------------------------|---|---|
| UNITED STATES OF AMERICA | ) | Case No. 1:20-CR-260                      |
|                          | ) |   |
| v.                       | ) | <u>Counts 1 – 2</u> : 18 U.S.C. § 1344(2) |
|                          | ) | (Bank Fraud)                              |
| DIDIER K. KINDAMBU,      | ) |   |
|                          | ) | <u>Counts 3 – 11</u> : 18 U.S.C. § 1957   |
| Defendant.               | ) | (Unlawful Monetary Transactions)          |
|                          | ) |   |
|                          | ) | <u>Count 12</u> : 18 U.S.C. § 1001(a)(2)  |
|                          | ) | (False Statements)                        |
|                          | ) |   |
|                          | ) | Forfeiture Notice                         |

**INDICTMENT**

November 2020 Term - at Alexandria, Virginia

**COUNTS 1 – 2**

(Bank Fraud)

THE GRAND JURY CHARGES THAT:

**Introductory Allegations**

At all times material to this Indictment, unless otherwise specified below:

1. Defendant DIDIER K. KINDAMBU (hereinafter “KINDAMBU” or “Defendant”) resided in Ashburn and Leesburg, Virginia, both within the Eastern District of Virginia.

2. Papillon Holdings Incorporated was a corporation formed in Delaware that maintained its registered office at one of KINDAMBU’s residences in Ashburn, Virginia. KINDAMBU served as the President, Registered Agent, and as a Director of Papillon Holdings Incorporated, and owned a substantial portion of the company’s stock.

3. Papillon Air Inc. was a corporation formed in Delaware that maintained its registered office at one of KINDAMBU's residences in Ashburn, Virginia. KINDAMBU served as the Chief Executive Officer, Registered Agent, and as a Director of Papillon Air Inc., and owned a substantial portion of the company's stock.

4. In or around March 2020, in response to the economic crisis caused by the novel coronavirus pandemic, the United States Congress passed the Coronavirus Aid, Relief, and Economic Security Act, Pub. L. No. 116-136, 134 Stat. 281 (2020) ("CARES Act"). Among other things, the CARES Act made billions of government-guaranteed loans available to qualified small businesses through the Paycheck Protection Program ("PPP"). The purpose of loans issued under the PPP was to enable small businesses suffering from the economic downturn to continue to pay salary or wages to their employees. The PPP was administered by the Small Business Administration ("SBA"), which promulgated regulations concerning eligibility for a PPP loan. Eligible businesses seeking a loan under the PPP could apply for such a loan through a federally insured depository institution.

5. To qualify for a loan under the PPP, an applicant had to meet certain criteria, including, among other things, that it was "in operation on February 15, 2020 and either had employees for whom [it] paid salaries and payroll taxes or paid independent contractors, as reported on a Form 1099-MISC." Moreover, the amount of the loan that could be approved under the PPP and implementing regulations typically was a function of the applicant's historical payroll costs, consisting of compensation to its employees whose principal place of residence was the United States, subject to certain exclusions.

6. The proceeds of a PPP loan could be used only for certain specified items, such as payroll costs, costs related to the continuation of group health care benefits, mortgage interest

payments (but not mortgage prepayments or principal payments), rent payments, utility payments, interest payments on debt obligations that were incurred before February 15, 2020, or for refinancing certain specified SBA loans. The proceeds of a PPP loan were not permitted to be used to purchase automobiles, aircraft, personal residences, clothing, jewelry, to pay the borrower's personal federal income taxes, or to fund the borrower's ordinary day-to-day living expenses unrelated to the specified authorized expenses.

7. Bank of America, N.A., and Wells Fargo Bank, N.A. each were banks the deposits of which were insured by the Federal Deposit Insurance Corporation ("FDIC"). Bank of America, N.A., and Wells Fargo Bank, N.A. each therefore constituted a "financial institution" for purposes of 18 U.S.C. §§ 20, 1344, and 1957.

#### **Scheme And Artifice To Defraud**

8. Beginning no later than in or about April 2020, and continuing through at least in or about October 2020, in the Eastern District of Virginia and elsewhere, defendant DIDIER K. KINDAMBU, and others known and unknown to the grand jury, did knowingly devise and intend to devise a scheme and artifice to obtain the moneys, funds, credits, assets, and other property owned by, and under the custody and control of, a financial institution, namely, Bank of America, N.A., by means of materially false and fraudulent pretenses, representations, and promises.

#### **Purpose and Object of the Scheme**

9. It was the purpose and object of the scheme for KINDAMBU fraudulently to obtain moneys, funds, credits, assets, and other property owned by, and under the custody and control of, Bank of America, N.A., namely, PPP loan proceeds, and to spend those proceeds on items that were not authorized under the PPP.

**Manner and Means of the Scheme**

10. In furtherance of the scheme to defraud, and to accomplish its unlawful objects, the following manner and means were used, among others:

**The Fraudulent Loan Application and Promissory Note  
For Papillon Holdings Incorporated**

11. On or about April 6, 2020, KINDAMBU submitted and caused to be submitted a fraudulent loan application to Bank of America, N.A. on behalf of Papillon Holdings, Incorporated. In this application, KINDAMBU knowingly made and caused to be made numerous materially false and fraudulent representations to Bank of America, N.A. Among other things, the application KINDAMBU submitted and caused to be submitted on behalf of Papillon Holdings Incorporated made all of the following materially false and fraudulent representations:

a. KINDAMBU falsely claimed that Papillon Holdings Incorporated had average monthly payroll expenses of at least \$150,000. KINDAMBU knew that this was false, and that in truth and fact, Papillon Holdings Incorporated had few if any payroll expenses.

b. KINDAMBU falsely claimed in the application that in 2019, Papillon Holdings Incorporated had “Payroll Costs” consisting of “[s]alaries, wages, commissions, vacation and sick pay (as reported on IRS form 940)” in the amount of \$7,181,552.” KINDAMBU knew that this was false, and that in truth and fact, Papillon Holdings, Incorporated had few if any payroll expenses.

c. KINDAMBU falsely represented that “the United States” was “the principal place of residence for all employees of the Applicant included in the Applicant’s payroll calculation above.” KINDAMBU knew that this was false, and that in truth and fact,

Papillon Holdings Incorporated had few if any employees based in the United States, or anywhere else.

d. KINDAMBU falsely certified that “[a]ll SBA loan proceeds will be used only for business-related purposes as specified in the loan application and consistent with the Paycheck Protection Program Rule.” KINDAMBU knew that this was false, and that he intended to use the PPP loan proceeds for unauthorized purposes, including for his day-to-day living expenses.

e. KINDAMBU falsely certified that “the funds will be used to retain workers and maintain payroll or make mortgage payments, lease payments, and utility payments; as specified under the Paycheck Protection Program Rule.” KINDAMBU knew that this was false, and that he intended to use the PPP loan proceeds for unauthorized purposes.

f. KINDAMBU falsely attested and certified in the application that he had “not provided false or misleading information or statements to the Bank in this Addendum to its application for a Paycheck Protection Program loan, and that the confirmations, responses, certifications, and authorizations made to the Bank in this Addendum and its application for a Paycheck Protection Program loan are true, accurate, and correct.” KINDAMBU knew that he had made numerous false statements in this PPP loan application.

12. As a part of the fraudulent loan application on behalf of Papillon Holdings Incorporated, KINDAMBU also submitted and caused to be submitted to Bank of America, N.A. a spreadsheet that purported to list payroll expenses incurred by Papillon Holdings Incorporated. The spreadsheet purported to document millions of dollars in payroll expenses that Papillon Holdings Incorporated supposedly had incurred over 2019 and the first few months of 2020, and further claimed to identify the names of eighteen employees paid by Papillon Holdings

Incorporated. The spreadsheet also purported to itemize the salaries paid to each employee in 2019, and the amounts withheld from each employee's salary for federal income, Medicare, and Social Security taxes, and for Virginia income taxes. As KINDAMBU knew, the spreadsheet was a fabrication; the names listed in the spreadsheet were not people who had worked for Papillon Holdings Incorporated, and the company had not incurred the payroll expenses or withheld the taxes listed in the spreadsheet.

13. On or about May 13, 2020, KINDAMBU completed a false and fraudulent Promissory Note on behalf of Papillon Holdings Incorporated for a PPP loan to be issued by Bank of America, N.A. in the amount of \$375,000. In the Promissory Note, KINDAMBU knowingly made numerous materially false and fraudulent representations, including all of the following:

a. that "[a]ll proceeds of the Loan will be used only for business-related purposes as specified in the Application and consistent with the Paycheck Protection Program Rule."

b. that "[t]he current economic uncertainty makes the request for the Loan necessary to support the ongoing operations of Borrower."

c. that "[a]ll proceeds of the Loan will be used to retain workers and maintain payroll or make mortgage interest payments, lease payments, and utility payments, as specified under the Paycheck Protection Program Rule."

d. that "[b]orrower has provided Bank true, correct and complete information demonstrating that Borrower had employees for whom Borrower paid salaries and payroll taxes on or around February 15, 2020."

e. that “[b]orrower has provided to Bank all documentation available to Borrower on a reasonable basis verifying the dollar amounts of average monthly payroll costs for the calendar year 2019 . . . .”

f. that “the information provided in the Application and the information that Borrower provided in all supporting documents and forms is true and accurate in all material respects.”

g. that “[t]he United States is the principal place of residence for all employees of Borrower included in Borrower’s payroll calculation included in the Application.”

h. that he had “not provided false or misleading information or statements to the Bank in its application for the Loan, and that the certifications, representations, warranties, and covenants made to the Bank in this Note and elsewhere relating to the Loan are true, accurate, and correct.”

The Fraudulent Loan Application and Promissory Note  
For Papillon Air Inc.

14. On or about April 6, 2020, KINDAMBU submitted and caused to be submitted a fraudulent loan application to Bank of America, N.A. on behalf of Papillon Air, Inc. In this application, KINDAMBU knowingly made and caused to be made numerous materially false and fraudulent representations to Bank of America, N.A. Among other things, the application KINDAMBU submitted and caused to be submitted on behalf of Papillon Air, Inc. made all of the following materially false and fraudulent representations:

a. KINDAMBU falsely claimed that Papillon Air, Inc. had average monthly payroll expenses of at least \$850,701.25. KINDAMBU knew that this was false, and that in truth and fact, Papillon Air, Inc. had few if any payroll expenses.

b. KINDAMBU falsely claimed that in 2019, Papillon Air, Inc. had “Payroll Costs” consisting of “[s]alaries, wages, commissions, vacation and sick pay (as reported on IRS form 940)” in the amount of \$10,208,415.”

c. KINDAMBU falsely represented that “the United States” was “the principal place of residence for all employees of the Applicant included in the Applicant’s payroll calculation above.” KINDAMBU knew that this was false, and that in truth and fact, Papillon Air, Inc. had few if any employees based in the United States, or anywhere else.

d. KINBAMBU falsely certified that “[a]ll SBA loan proceeds will be used only for business-related purposes as specified in the loan application and consistent with the Paycheck Protection Program Rule.” KINDAMBU knew that this was false, and that he intended to use the PPP loan proceeds for unauthorized purposes, including for his day-to-day living expenses.

e. KINDAMBU falsely certified that “the funds will be used to retain workers and maintain payroll or make mortgage payments, lease payments, and utility payments; as specified under the Paycheck Protection Program Rule.” KINDAMBU knew that this was false, and that he intended to use the PPP loan proceeds for unauthorized purposes.

f. KINDAMBU falsely attested and certified in the application that he had “not provided false or misleading information or statements to the Bank in this Addendum to its application for a Paycheck Protection Program loan, and that the confirmations, responses, certifications, and authorizations made to the Bank in this Addendum and its application for a Paycheck Protection Program loan are true, accurate, and correct.” KINDAMBU knew that he had made numerous false statements in this PPP loan application.



15. As a part of the fraudulent loan application on behalf of Papillon Air, Inc., KINDAMBU also submitted and caused to be submitted to Bank of America, N.A. a spreadsheet that purported to list payroll expenses incurred by Papillon Air, Inc. The spreadsheet purported to document millions of dollars in payroll expenses that Papillon Air, Inc. supposedly had incurred over 2019 and the first few months of 2020, and further claimed to identify the names of twelve employees and an additional seventeen “1099 Employees” paid by Papillon Air, Inc. The spreadsheet also purported to itemize the salaries paid to each of the regular employees in 2019 and the first few months of 2020, and the amounts withheld from each regular employee’s salary for federal income, Medicare, and Social Security taxes, and for Virginia income taxes. As KINDAMBU knew, the spreadsheet was a fabrication; the names listed in the spreadsheet were not people who had worked for Papillon Air, Inc., and the company had not incurred the payroll expenses or withheld the taxes listed in the spreadsheet.

16. On or about May 6, 2020, KINDAMBU completed a false and fraudulent Promissory Note on behalf of Papillon Air, Inc. for a PPP loan to be issued by Bank of America, N.A. in the amount of \$2,126,753. In the Promissory Note, KINDAMBU knowingly made numerous materially false and fraudulent representations, including all of the following:

a. that “[a]ll proceeds of the Loan will be used only for business-related purposes as specified in the Application and consistent with the Paycheck Protection Program Rule.”

b. that “[t]he current economic uncertainty makes the request for the Loan necessary to support the ongoing operations of Borrower.”

c. that “[a]ll proceeds of the Loan will be used to retain workers and maintain payroll or make mortgage interest payments, lease payments, and utility payments, as specified under the Paycheck Protection Program Rule.”

d. that “[b]orrower has provided Bank true, correct and complete information demonstrating that Borrower had employees for whom Borrower paid salaries and payroll taxes on or around February 15, 2020.”

e. that “[b]orrower has provided to Bank all documentation available to Borrower on a reasonable basis verifying the dollar amounts of average monthly payroll costs for the calendar year 2019 . . . .”

f. that “the information provided in the Application and the information that Borrower provided in all supporting documents and forms is true and accurate in all material respects.”

g. that “[t]he United States is the principal place of residence for all employees of Borrower included in Borrower’s payroll calculation included in the Application.”

h. that he had “not provided false or misleading information or statements to the Bank in its application for the Loan, and that the certifications, representations, warranties, and covenants made to the Bank in this Note and elsewhere relating to the Loan are true, accurate, and correct.”

KINDAMBU Misappropriates PPP Loan Proceeds

17. On or about May 6, 2020, Bank of America, N.A. disbursed approximately \$2,126,753 in PPP loan proceeds to Papillon Air, Inc., which funds were deposited into an account controlled by KINDAMBU.

18. On or about May 14, 2020, Bank of America, N.A. disbursed approximately \$375,000 in PPP loan proceeds to Papillon Holdings Incorporated, which funds were deposited into an account controlled by KINDAMBU.

19. It was a further part of the scheme that, once KINDAMBU obtained the proceeds of the loans issued to Papillon Air, Inc. and Papillon Holdings Incorporated, he knowingly spent those proceeds in part on numerous items that he knew were not authorized under the PPP. Among other things, KINDAMBU knowingly used proceeds from the PPP loans for all of the following unauthorized expenses:

- a. to purchase a 2020 Lexus ES350 Sport F, bearing vehicle identification number (“VIN”) 58AGZ1B15LU072930;
- b. to pay for part of the purchase of a Cessna 172S aircraft, N number N445KS, aircraft serial number 172S12534;
- c. to make the down payment towards the purchase of real property and improvements located at 43464 Calphams Mill Court, Leesburg, VA 20176;
- d. to pay his personal taxes due and owing to the Internal Revenue Service, among other taxes;
- e. to purchase items at a Gucci store in Vienna, Virginia;
- f. to purchase clothing and accessories at a Winn Bros store in Tyson’s Corner Center in McLean, Virginia;
- g. to purchase luxury shoes, clothing, and accessories at a Nordstrom store in Tyson’s Corner Center in McLean, Virginia;
- h. to purchase items from Hugo Boss;
- i. to purchase items from Lenkersdorfer Fine Jewelry;

j. to pay for a variety of KINDAMBU's personal day-to-day living expenses, unrelated to the expenses authorized under the PPP.

**Executions**

20. On or about the dates listed below, in the Eastern District of Virginia and Elsewhere,

DIDIER K. KINDAMBU,

defendant herein, knowingly executed and attempted to execute the above-described scheme and artifice, as described below:

| <b><u>Count</u></b> | <b><u>Approx. Date</u></b> | <b><u>Summary Description</u></b>  |
|---------------------|----------------------------|--|
| 1                   | 4/6/2020                   | submission of fraudulent PPP loan application on behalf of Papillon Holdings Incorporated to Bank of America, N.A. |
| 2                   | 4/6/2020                   | submission of fraudulent PPP loan application on behalf of Papillon Air, Inc. to Bank of America, N.A.             |

(In violation of Title 18, United States Code, Sections 1344(2) and 2.)

**COUNTS 3 – 11**

(Engaging in Monetary Transactions in Criminally Derived Property)

THE GRAND JURY FURTHER CHARGES THAT:

21. Paragraphs 1 through 7 of this Indictment are realleged and incorporated by reference as though set forth in full herein.

22. On or about the dates listed below, in the Eastern District of Virginia and elsewhere, and having participated in the transfer of the proceeds of specified unlawful activity from the Eastern District of Virginia,

DIDIER K. KINDAMBU,

defendant herein, knowingly engaged in a monetary transaction in criminally derived property of a value greater than \$10,000, namely, the monetary transactions identified below, which transactions involved the deposit, withdrawal, transfer, or exchange, in and affecting interstate commerce, of funds or a monetary instrument by, through, or to a financial institution, which offenses took place in the United States, and which funds were derived from specified unlawful activity, namely, proceeds of the bank fraud scheme alleged in Counts 1 through 2 of this Indictment:

| <b><u>Count</u></b> | <b><u>Approx. Date</u></b> | <b><u>Monetary Transaction</u></b>   |
|---------------------|----------------------------|--|
| 3                   | 5/8/2020                   | transfer of approximately \$15,000 from Bank of America, N.A. account 4350 4341 0536 to Bank of America, N.A. account 4350 3800 0964   |
| 4                   | 5/13/2020                  | transfer of approximately \$1,000,000 from Bank of America, N.A. account 4350 4341 0536 to Wells Fargo Bank, N.A. account 1439 58 9589 |
| 5                   | 5/27/2020                  | transfer of approximately \$43,587 from Wells Fargo Bank, N.A. account 1439 58 9589 to Wells Fargo Bank, N.A. account 1439 58 5165     |

| <u>Count</u> | <u>Approx. Date</u> | <u>Monetary Transaction</u>  |
|--------------|---------------------|--|
| 6            | 6/7/2020            | check number 165 in the amount of approximately \$41,585.65 drawn on Bank of America, N.A. account 4350 3800 0964 made payable to Pohanka Lexus, for the purchase of a 2020 Lexus ES350 Sport F, bearing vehicle identification number (“VIN”) 58AGZ1B15LU072930                       |
| 7            | 6/15/2020           | transfer of approximately \$830,000 from Wells Fargo Bank, N.A. account 1439 58 9589 to Wells Fargo Bank, N.A. account 2129 67 5860  |
| 8            | 6/16/2020           | transfer of approximately \$13,500 from Bank of America, N.A. account 4350 4341 0536 to Bank of America, N.A. account 4350 4341 0552   |
| 9            | 8/18/2020           | wire transfer of approximately \$312,209 from Bank of America, N.A. account 4350 4341 0536 to account of Textron Aviation Inc. for the purchase of a Cessna 172S aircraft, N number N445KS, aircraft serial number 172S12534   |
| 10           | 8/21/2020           | cashier’s check in the amount of approximately \$415,627.16, purchased with funds from Wells Fargo Bank, N.A. account 2129 67 5860, made payable to Vesta Settlements LLC, for the purchase of real property and improvements located at 43464 Calphams Mill Court, Leesburg, VA 20176 |
| 11           | 8/28/2020           | transfer of approximately \$11,000 from Wells Fargo Bank, N.A. account 2129 67 5860 to Wells Fargo Bank, N.A. account 5311 48 9834   |

(In violation of Title 18, United States Code, Sections 1957 and 2.)

**COUNT 12**

(False Statements)

THE GRAND JURY FURTHER CHARGES THAT:

23. Paragraphs 1 through 7 of this Indictment are realleged and incorporated by reference as though set forth in full herein.

24. The SBA was an agency of the executive branch of the Government of the United States. The Office of Inspector General of the SBA (“SBA OIG”) was an office within the SBA that had the duty and responsibility for, among other things, conducting, supervising, and coordinating investigations relating to the programs and operations of the SBA. In carrying out these duties and responsibilities, the SBA OIG further had the duty to report expeditiously to the Attorney General whenever the SBA OIG had reasonable grounds to believe that there had been a violation of Federal criminal law. Moreover, special agents of the SBA OIG were authorized, among other things, to execute warrants for the seizure of evidence issued under the authority of the United States upon probable cause to believe that a violation had been committed. Prior to October 20, 2020, a warrant for the seizure of a 2020 Lexus ES350 Sport F, bearing vehicle identification number (“VIN”) 58AGZ1B15LU072930, had been issued under the authority of the United States. Accordingly, it was a matter within the jurisdiction of the SBA OIG whether fraud or other criminal conduct had been committed in relation to the PPP or loans issued under that program. It was further a matter within the jurisdiction of the SBA OIG to determine the location of the Lexus ES350.

25. The Internal Revenue Service (“IRS”) was a bureau of the Department of the Treasury, an agency of the executive branch of the Government of the United States. IRS Criminal Investigation (“IRS CI”) was the criminal investigative arm of the IRS. IRS CI had the

authority to conduct criminal investigations into, among other things, unlawful monetary transactions, in violation of 18 U.S.C. § 1957. IRS CI further had the authority to seek seizure and criminal forfeiture of assets relating to violations of 18 U.S.C. § 1957. Accordingly, it was a matter within the jurisdiction of the IRS CI whether KINDAMBU had engaged in unlawful monetary transactions in connection with the PPP or loans issued under that program. It was further a matter within the jurisdiction of IRS CI to determine the location of the Lexus ES350.

26. On or about October 20, 2020, at Leesburg, within the Eastern District of Virginia,

DIDIER K. KINDAMBU,

defendant herein, did knowingly and willfully make materially false, fictitious, and fraudulent statements and representations in a matter within the jurisdiction of the executive branch of the Government of the United States, namely,

- (i) stating falsely that a Lexus ES350 automobile had been returned to a Lexus dealership in Chantilly;
- (ii) stating falsely that he had used funds from outside of the United States for the down payment towards the purchase of his residence in Leesburg, VA;
- (iii) stating falsely that he had not used proceeds from the Paycheck Protection Program loans for the down payment towards the purchase of his residence in Leesburg, VA; and
- (iv) stating falsely that he had not used proceeds from the Paycheck Protection Program loans to pay for personal expenses.

(In violation of Title 18, United States Code, Section 1001(a)(2).)



FORFEITURE NOTICE

THE GRAND JURY FURTHER FINDS PROBABLE CAUSE THAT THE PROPERTY DESCRIBED BELOW IS SUBJECT TO FORFEITURE:

27. Pursuant to Federal Rule of Criminal Procedure 32.2(a), the defendant DIDIER K. KINDAMBU is hereby notified that, if convicted of an offense alleged in Counts 1 through 2 of this Indictment, the defendant shall forfeit to the United States, pursuant to 18 U.S.C. § 982(a)(2)(A), any property constituting, or derived from, proceeds the person obtained directly or indirectly, as a result of the violation.

28. Pursuant to Federal Rule of Criminal Procedure 32.2(a), the defendant DIDIER K. KINDAMBU is hereby notified that, if convicted of an offense alleged in Counts 3 through 11 of this Indictment, the defendant shall forfeit to the United States, pursuant to 18 U.S.C. § 982(a)(1), any property, real or personal, involved in the violation, or any property traceable to such property.

29. If any property that is subject to forfeiture 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 to, 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 that cannot be divided without difficulty, it is the intention of the United States to seek forfeiture of any other property of the defendant, as subject to forfeiture under Title 21, United States Code, Section 853(p).

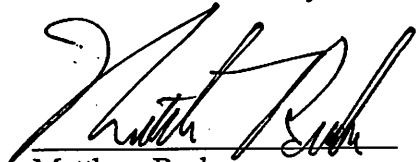
30. The property subject to forfeiture includes, but is not limited to the following:
- a. A sum of money equal to at least \$2,501,753, representing the amount of proceeds obtained as a result of the fraud scheme charged in Counts 1 and 2;

- b. \$555,315.97 seized from Bank of America account 4350 4341 0536;
- c. \$101,284.86 seized from Bank of America account 4350 3790 6713;
- d. \$59,788.19 seized from Bank of America account 4350 3800 0964;
- e. \$2,775.00 seized from Bank of America account 4350 4341 0552;
- f. \$28,882.02 seized from Wells Fargo Bank account 1439 58 9589;
- g. \$8,353.63 seized from Wells Fargo Bank account 2129 67 5860;
- h. \$7,985.87 seized from Wells Fargo Bank account 5311 48 9834;
- i. \$2,864.46 seized from Wells Fargo Bank account 1439 58 5165;
- j. A 2020 Lexus ES350 Sport F, bearing vehicle identification number (“VIN”) 58AGZ1B15LU072930, and associated keys;
- k. A Cessna 172S aircraft, N number N445KS, aircraft serial number 172S12534, and all associated flight logs, air worthiness certificates, keys, and log books; and
- l. Real property and improvements located at 43464 Calphams Mill Court, Leesburg, VA 20176.

(In accordance with Title 18, United States Code, Sections 982(a)(1) and (a)(2)(A); and Rule 32.2(a), Federal Rules of Criminal Procedure.)

G. Zachary Terwilliger  
United States Attorney

By:



Matthew Burke  
Assistant United States Attorney

A TRUE BILL  
Pursuant to the E-Government Act,  
the original of this page has been filed  
under seal in the Clerk's Office.

\_\_\_\_\_  
FOREPERSON OF THE GRAND JURY