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Oct 06 2020
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SOUTHERN DISTRICT OF CALIFORNIA
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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA
November 2019 Grand Jury

UNITED STATES OF AMERICA,
Plaintiff,

Case No. '20 CR3107 WQH

I N D I C T M E N T

v.

HARGOBIND TAHILRAMANI,
aka Gobind Lal Tahil,
Defendant.

Title 18, U.S.C., Sec. 1349 -
Conspiracy; Title 18, U.S.C.,
Sec. 1343 - Wire Fraud;
Title 18, U.S.C., 1028A -
Aggravated Identity Theft;
Title 18, U.S.C., Sec. 2 - Aiding
and Abetting; Title 18, U.S.C.,
Sec. 981(a)(1)(C), and Title 28,
U.S.C., Sec 2461(c) - Criminal
Forfeiture

The grand jury charges, at all times material:

Count 1: Conspiracy to Commit Wire Fraud

(18 U.S.C. § 1349)

1. Beginning as early as 2013 and continuing up to and including at least August 2020, in an offense begun outside of the jurisdiction of any particular State and district of the United States, and committed within the Southern District of California and elsewhere, defendant HARGOBIND TAHILRAMANI, aka Gobind Lal Tahil, who will be first brought to the Southern District of California, knowingly and intentionally conspired and agreed with persons known and unknown to the grand jury, to commit the offense of wire fraud, in violation of Title 18, United States Code, Section 1343.

1 2. It was the purpose of the conspiracy for TAHILRAMANI and his
2 co-conspirators to profit by pretending to be entertainment industry
3 executives and their representatives, in order to lure individuals
4 employed in the entertainment industry to Indonesia where they were
5 tricked into paying exorbitant fees, purportedly for transportation and
6 other services.

7 3. In furtherance of their conspiracy, and to effect its objects,
8 TAHILRAMANI and his co-conspirators used the following manner and means,
9 among others:

10 a. TAHILRAMANI and his co-conspirators would contact
11 individuals employed in the entertainment industry including, among
12 others, actors, photographers, writers, and security consultants. To
13 contact these entertainment industry professionals, TAHILRAMANI and his
14 co-conspirators would use telephone numbers and email addresses that
15 concealed TAHILRAMANI's identity. When speaking with the entertainment
16 industry professionals, TAHILRAMANI would use fake accents and would
17 alter his voice to sound like a woman.

18 b. TAHILRAMANI and his co-conspirators would falsely claim
19 to be, among others: well-known entertainment industry executives;
20 individuals who worked with the entertainment industry executives; and
21 family members of the entertainment industry executives.

22 c. TAHILRAMANI and his co-conspirators would falsely claim
23 that they wanted to hire the entertainment industry professionals to
24 work on films and other projects purportedly based in Indonesia, when
25 in fact, no such films or other projects existed.

26 d. TAHILRAMANI and his co-conspirators would invite the
27 entertainment industry professionals to travel to Indonesia in
28 connection with the bogus projects. The purported purpose of the travel

1 included, among others, conducting site surveys, scouting film
2 locations, conducting research, and drafting screenplays, but in reality
3 all of these tasks were fabricated.

4 e. TAHILRAMANI and his co-conspirators would fraudulently
5 promise to reimburse the travel and other expenses incurred by the
6 entertainment industry professionals as part of their trips to
7 Indonesia, including transportation expenses, translation expenses, and
8 permit fees.

9 f. When the entertainment industry professionals arrived in
10 Indonesia, TAHILRAMANI's co-conspirators would typically meet them at
11 the airport in Jakarta. One of these individuals would collect a sum
12 of money from the entertainment industry professionals, purportedly to
13 cover transportation costs and various fees. Another individual would
14 act as a driver.

15 g. During the entertainment industry professionals' visits
16 in Indonesia, TAHILRAMANI and his co-conspirators would arrange for them
17 to visit different locations each day and would charge what they claimed
18 were additional transportation costs, which were collected in cash each
19 day and which far exceeded the average costs of transportation in
20 Indonesia. TAHILRAMANI's co-conspirators would deposit these cash
21 payments into a bank account controlled by TAHILRAMANI.

22 h. TAHILRAMANI would meet in person with some of the
23 entertainment industry professionals in offices in Jakarta, Indonesia.
24 In order to conceal his identity, TAHILRAMANI would use a fake name.

25 i. When entertainment industry professionals returned home
26 and requested reimbursement for the expenses they incurred traveling to
27 and within Indonesia, TAHILRAMANI and his co-conspirators would not
28 reimburse the expenses as promised, but would conceal their failure to

1 pay by sending the entertainment industry professionals fraudulent
2 remittance forms that falsely indicated that funds had been wired to the
3 entertainment industry professionals' bank accounts.

4 j. If an entertainment industry professional questioned
5 TAHILRAMANI's assumed identity or tried to withdraw from an agreement
6 to work one on of his purported projects, TAHILRAMANI would threaten
7 them by, among other things, stating that he would dismember the
8 entertainment industry professional or sending pictures of the
9 entertainment industry professional's children.

10 k. Starting in early 2020, in light of worldwide travel
11 restrictions associated with the COVID-19 pandemic which prevented
12 entertainment industry professionals from traveling to Indonesia,
13 TAHILRAMANI and his co-conspirators would adjust their scheme and
14 generate additional fraudulent proceeds by fraudulently convincing
15 entertainment industry professionals to purchase materials, such as
16 training videos, in order to participate in films or other projects that
17 did not actually exist.

18 All in violation of Title 18, United States Code, Section 1349.

19 **Counts 2 & 3: Wire Fraud**

20 (18 U.S.C. § 1343)

21 4. Beginning as early as 2013 and continuing up to and including
22 at least August 2020, in an offense begun outside of the jurisdiction
23 of any particular State and district of the United States, and committed
24 within the Southern District of California and elsewhere, defendant
25 HARGOBIND TAHILRAMANI, aka Gobind Lal Tahil, who will be first brought
26 to the Southern District of California, knowingly and with the intent
27 to defraud, devised a material scheme to defraud victims and to obtain
28 their money and property by means of materially false and fraudulent

1 pretenses, representations and promises, and by intentional concealment
 2 and omission of material facts.

3 5. Paragraphs 1 through 3 and all sub-paragraphs are realleged
 4 and incorporated herein as more fully describing the scheme to defraud.

5 **Interstate Wires**

6 6. On or about the dates listed below, within the Southern
 7 District of California and elsewhere, defendant HARGOBIND TAHILRAMANI,
 8 aka Gobind Lal Tahil, for the purpose of executing an essential part of
 9 the aforesaid scheme to defraud, caused to be transmitted by wire in
 10 interstate and foreign commerce certain writings, signs, and signals
 11 described below, to wit:

Count	Date	Item Transmitted
2	1/27/17	An email from M.D. to M.H. regarding a meeting with B.B.
3	7/12/17	An email from J.P. to C.G., carbon copy to M.N., regarding a non-disclosure agreement.

16 All in violation of Title 18, United States Code, Sections 1343 and 2.

17 **Counts 4-8: Aggravated Identity Theft**

18 (18 U.S.C. § 1028A)

19 7. Paragraphs 1 through 3 and all sub-paragraphs are realleged
 20 and incorporated herein.

21 8. On or about the dates listed below, in an offense begun outside
 22 of the jurisdiction of any particular State and district of the United
 23 States, and committed within the Southern District of California and
 24 elsewhere, defendant HARGOBIND TAHILRAMANI, aka Gobind Lal Tahil, who
 25 will be first brought to the Southern District of California, during and
 26 in relation to a felony violation of Title 18, United States Code,
 27 Section 1343 (Wire Fraud), and a felony violation of Title 18, United
 28 States Code, Section 1349 (Conspiracy), knowingly transferred,

1 possessed, and used, without lawful authority, the means of
 2 identification of another person as listed below, knowing that the means
 3 of identification belonged to another actual person.

Count	Date	Person	Means of Identification
4	1/27/17	B.B.	The name of B.B. in an email to M.H.
5	7/12/17	J.P.	The name of J.P. in an email to C.G.
6	10/18/17	A.P.	The name of A.P. in an email to W.S.
7	8/23/20	D.L.	The name of D.L. in a telephone call with T.N.
8	8/23/20	D.L.	The name of D.L. in a telephone call with T.O.

9 All in violation of Title 18, United States Code, Sections 1028A and 2.

10 FORFEITURE ALLEGATION

11 9. The allegations contained in Counts 1 through 3 of this
 12 Indictment are re-alleged and incorporated by reference for the purpose
 13 of alleging forfeiture to the United States pursuant to Title 18, United
 14 States Code, Section 981(a)(1)(C) and Title 28, United States Code,
 15 Section 2461(c).

16 10. Upon conviction of one or more of the offenses set forth in
 17 Counts 1 through 3, defendant HARGOBIND TAHILRAMANI, aka Gobind Lal
 18 Tahil, shall forfeit to the United States any property, real or personal,
 19 which constitutes or was derived from proceeds traceable to such
 20 violation.

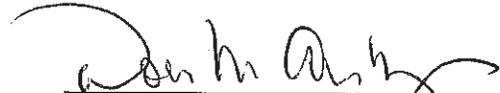
21 11. If any of the above-described forfeited property, as a result
 22 of any act or omission of defendant HARGOBIND TAHILRAMANI, aka Gobind
 23 Lal Tahil, cannot be located upon the exercise of due diligence; has
 24 been transferred or sold to, or deposited with, a third person; has been
 25 placed beyond the jurisdiction of the Court; has been substantially
 26 diminished in value; or has been commingled with other property which
 27 cannot be subdivided without difficulty, it is the intent of the United
 28 States, pursuant to Title 21, United States Code, Section 853(p), made

1 applicable herein by Title 28, United States Code, Section 2461(c), to
2 seek forfeiture of any other property of Defendants up to the value of
3 the property described above subject to forfeiture.

4 All pursuant to Title 18, United States Code, Section 981(a)(1)(C), and
5 Title 28, United States Code, Section 2461(c).

6 DATED: October 6, 2020.

7 A TRUE BILL:

8 
9 _____
Foreperson

10 ROBERT S. BREWER, JR.
United States Attorney

11
12 By: 
13 _____
ANDREW J. GALVIN
Assistant U.S. Attorney

14
15 By: 
16 _____
MATTHEW J. SUTTON
Assistant U.S. Attorney