IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF FLORIDA
GAINESVILLE DIVISION

UNITED STATES OF AMERICA

v.

MANPREET SINGH

Case No. 1:26MJ91 MAL

CRIMINAL COMPLAINT AFFIDAVIT

I, Brett Heil, being a duly sworn and appointed Special Agent for the Federal Bureau of Investigation (FBI), hereby make the following statement in support of the attached criminal complaint.

INTRODUCTION AND AGENT BACKGROUND

1. I am a Special Agent with the Federal Bureau of Investigation (FBI) and have been since September 2017. I am currently assigned to the Jacksonville Field Office, Gainesville Resident Agency. I have previously been assigned to the New Orleans, Louisiana Field Office. My duties and responsibilities have included investigating cyber-crime, white-collar crime, domestic terrorism, and crimes against children. I have also assisted in the prosecution of those crimes.

2. The information set forth in this affidavit is based on my personal knowledge, as well as information obtained from other sources, either involved in the investigation or who have personal knowledge of the facts herein. Because this affidavit is submitted for the limited purpose of establishing probable cause, I have

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not included every detail of every aspect of the investigation for this affidavit. Rather, it only includes the information necessary to support a finding of probable cause.

3. Based on my training and experience and the facts as set forth in this affidavit, there is probable cause to believe that violations of 18 U.S.C. § 1349 (Conspiracy to Commit Wire Fraud) have been committed by Manpreet Singh ("Manpreet"), and other co-conspirators.

Probable Cause

4. In early May 2026, **Victim 1** (an elderly female) received an email claiming to be from Amazon. The email indicated there was a problem with her Campus USA bank account, and that she needed to call a phone number provided in the email. When she called the number, she spoke with "John Harris" from Campus USA, who told her that her identity had been stolen and that her Social Security Number (SSN) was compromised. Harris then directed **Victim 1** to contact an "Agent" from the "Federal Trade Commission" (FTC) named "Michael Chappell." **Victim 1** telephonically contacted Chappell, who told her that numerous people had used her SSN, some of whom used it for drug deals and other illegal acts.

5. Chappell told **Victim 1** that in order to clear her name and receive a new SSN, she would need to make financial payments to the U.S. Government.

Chappell got **Victim 1** to divulge the amount of money in her Campus USA checking account, which was a little over $100,000. Chappell then directed **Victim 1** to write a check for the full amount in her checking account and use it to purchase gold bars from a local gold and jewelry dealer.

6. **Victim 1** identified a Gainesville-based gold dealer and used a check to purchase 21 gold bars, worth $101,220. Chappell subsequently directed **Victim 1** to put the gold in a box, along with a piece of paper containing her name, address, and an "FTC ID Number" she was given by Chappell. **Victim 1** was then instructed to take a photo of the items and send it to Chappell. **Victim 1** was told that somebody from the Treasury Department would be coming to her house in McIntosh, FL, to pick up the gold on or about the morning of May 16th.

7. On or about the morning of May 16th, the Treasury Agent did not appear at **Victim 1's** house at the agreed-upon time. Shortly thereafter, Chappell called **Victim 1**, who told her that the Treasury Agent deemed the neighborhood unsafe, and asked that **Victim 1** instead meet the Agent at a local Sunoco gas station that was a few miles from her house.

8. While on the phone with Chappell, **Victim 1** drove to the Sunoco. When she arrived, Chappell had her text him a photo of herself and her car at the gas station. Soon thereafter, an unknown male subject (UNSUB) wearing a mask pulled up in a light grey Volvo sedan. The UNSUB gave **Victim 1** the code word

"butterfly," which Chappell had given her ahead of time. **Victim 1** put the box of gold in the car and the UNSUB drove away.

9. On approximately May 18th, a few days after the initial gold drop-off at the Sunoco, Chappell contacted **Victim 1** and told her more money would be required. **Victim 1** told Chappell that she had close to $500,000 in a J.W. Cole investment account, which was managed by Cornerstone Financial Group (CFG) in Gainesville, FL. The $500,000 represented almost all of **Victim 1's** remaining life savings.

10. Chappell directed her to transfer that money to her Campus USA checking account, again use the funds to buy gold bars, and provide status updates. Chappell also told **Victim 1** that it was very important that she not tell anyone about what was going on.

11. Prior to **Victim 1** transferring her funds and procuring the next batch of gold bars, a concerned citizen who was aware of **Victim 1's** prior gold purchase contacted the FBI. The FBI subsequently contacted and interviewed **Victim 1**, who provided the above-referenced information. The FBI notified **Victim 1** that she was being defrauded, and **Victim 1** agreed to assist the FBI in identifying/apprehending subjects of the ongoing fraud.

12. At the direction of the FBI, **Victim 1** indicated to Chappell that she had transferred approximately $500,000 in gold from her investment account to her

Campus USA account and had subsequently used the funds to procure $497,229 worth of gold (107 1-ounce gold bars). After notifying Chappell that she had procured the gold bars, Chappell scheduled another transfer of the gold from **Victim 1** to the aforementioned "Treasury Agent" on June 1, 2026.

13. On June 1, 2026, the FBI arrested Gurpinder Singh ("Gurpinder"), the individual who attempted to pick-up the gold from **Victim 1**.

Interview of Gurpinder Singh

14. On June 22, 2026, Gurpinder was interviewed by investigators. The interview was audio and video recorded. Post-*Miranda*, Gurpinder explained that he lived in Bakersfield, California, and was first contacted about going to Florida to conduct the aforementioned pick-up from **Victim 1** by his friends Yashdeep Singh ("Yashdeep") and Navjeet Singh ("Navjeet"). Navjeet paid for Gurpinder's flight to Florida while Navjeet's brother, Kuljeet Singh ("Kuljeet") gave Gurpinder $1,000 in cash.

15. Once Gurpinder arrived in Florida, he received a WhatsApp call from someone who identified himself only as "Tom." Tom, who Gurpinder believed to be based in India based on their subsequent conversations, was provided Gurpinder's contact information by Navjeet, and Tom instructed Gurpinder on what to do and where to go during the time period of the attempted pick-up from **Victim 1**.

16. Gurpinder stated that had he picked up the package of gold from **Victim 1** he was instructed to bring the gold to Navjeet in New York, where he was to receive $5,000 for acting as the courier. Gurpinder further stated that he knew these activities were illegal and that Tom, Navjeet, and Kuljeet were all in on the scam.

17. Subsequent investigation by the FBI corroborated Gurpinder's role as a courier for the fraud scheme and revealed further evidence that Gurpinder was part of an active cell of U.S.- and India-based co-conspirators who coordinated with each other using their cellular devices to repeatedly execute the above referenced fraud scheme, in addition to a related fraud scheme in which victims were convinced to mail packages of cash to the fraudsters. One of those co-conspirators was identified as Manpreet Singh ("Manpreet"), whose connection to, and participation in, the overarching fraud scheme was identified as follows:

Review of Kuljeet Singh's Cellular Device

18. On July 16, 2026, your affiant contacted Detective Ryder of the Bakersfield (CA) Police Department (BPD) related to a local arrest report involving Kuljeet at address 11717 California Poppy Drive, Bakersfield, CA 93311. The report indicated that on June 27, 2026, Kuljeet was arrested following a search warrant conducted at the above-listed address, during which law

enforcement identified unregistered guns belonging to Kuljeet, as well as a large number of UPS packages.

19. Pursuant to the search and arrest, BPD seized Kuljeet's phone, an iPhone 17 assigned call number 661-564-1446, and on July 17, 2026, the Honorable United States Magistrate Judge Midori A. Lowry signed a search warrant for the device.

20. A review of the device revealed messages between Kuljeet, Manpreet, and other co-conspirators involved in the two aforementioned fraud schemes (detailed further below), which targeted elderly victims in the United States. The messages also included conversations with the India-based fraudster "Tom" via the same WhatsApp number that Tom had used to communicate with Gurpinder.

21. The first fraud scheme, as described in the sections related to Gurpinder and **Victim 1**, involved India-based subjects posing as federal agents and/or United States federal judges to convince elderly victims to liquidate their assets into gold and then transferring the gold to U.S.-based couriers who they also believed were federal agents. Afterwards, the couriers would pass the gold on to receivers, who would launder the proceeds back to other conspirators in different locations, including India. In multiple instances in Kuljeet's conversations with Tom and other members of the conspiracy, they discussed and coordinated the pick-up and drop-off of gold, and send photographs of gold bars and coins. This

included, for instance, Tom telling Kuljeet he needed someone to travel to Florida for a gold pick-up, and then Kuljeet and Navjeet coordinating Gurpinder's travel to Florida for the pick-up associated with **Victim 1**.

22. The second scam also involved the same India-based fraudsters duping U.S.-based victims into liquidating their assets, but in this instance the victims were instructed to send the cash to various addresses in and around Bakersfield, California, which were controlled by Kuljeet, Manpreet, and other, U.S.-based members of the fraud scheme. In dozens of instances, I reviewed text messages between Kuljeet, Tom, and other members of the conspiracy, in which the members shared detailed information about an incoming package – to include tracking numbers, recipient name and address, sender name and address, and the associated dollar amount. Once the package arrived, Kuljeet, among others, would take a video of themselves opening the package, revealing and counting the cash, and then sending the video to Tom to confirm receipt.

23. The FBI conducted research into the individuals listed as the senders of the packages and discovered they were virtually all elderly, and that some of them had already filed police reports about being defrauded into handing over gold and/or sending cash through the mail.

Communications Involving Manpreet

Gold Fraud

24. Further review of Kuljeet's device revealed multiple instances in which Kuljeet and Manpreet discussed activities associated with the aforementioned gold fraud scheme. For instance:

25. On May 29, 2026, at 11:00 AM PST, Kuljeet texted Manpreet, "Khadim jeweler fresno" and "Jana." Following the texts, Kuljeet and Manpreet conducted several WhatsApp calls. Then, around 12:30 pm, Kuljeet texted Manpreet, "1.55000." Manpreet responded in Punjabi, and then sent images of a gold coins/bars on a scale. Manpreet then texted "150,500."





26. On June 9, 2026, at approximately 12:30 AM, Manpreet asked if Kuljeet was in Bakersfield. Kuljeet responded "LA" and "Sacramento to." Kuljeet

texted "21 oz syd." The two then exchange the following text thread (translated from Punjabi using Google Translate):

a. **Manpreet**: "Yr dye bdi pai jana ee" – *Man, this is becoming a real hassle.*

b. **Manpreet:** "Hje t fdn jan day" – *Just let him go for now.*

c. **Kuljeet:** "Koi n jdo fadlya idr nu ajio" – *No worries; if you catch him, have him come this way.*

d. **Manpreet:** "Pesse ohnu khi shi dve yrr 1500 mile pe jani ee" – *Tell him to just hand over the money—I'm supposed to get 1,500 for this.*

27. Later the same day at, approximately 3:30 PM, Manpreet sent Kuljeet the following messages:

a. **Manpreet:** "Aa saman de pesse tom knda ye kam nhi thha ye to ese hi pkdana tha" – *Why are you fussing about the payment for the goods? That wasn't the task; I was just supposed to hand them over.*

b. **Manpreet:** "Yr 2 jgha to pickup kiti we 1500 mile gddi chlai ee eh t nhi shi gl Cheema" – *Man, I made pickups at two locations and drove the vehicle—I only got 1,500 for that. That's not right, Cheema.*

Cash Packages

28. Records from Kuljeet's phone also revealed information indicating that he and Manpreet were involved in the second aforementioned fraud involving

victims sending cash packages to addresses controlled by Kuljeet, Manpreet, and other co-conspirators. For instance:

29. On June 17, 2026, at approximately 6:30 PM, Manpreet mentioned Tom and sent a message in Punjabi that couldn't be translated. Kuljeet responded, "Address" and "Ohte parcel aya krunge," which roughly translates to "I'll keep sending parcels there." Manpreet then sent "12277 Habitat Way Rancho Cordova CA 95742," which was Manpreet's home address. Kuljeet responded with an audio clip, to which Manpreet responded, "Ok koi ni camera lgge ne mai dekh k chukla kraga," which roughly translates to "Okay, new cameras have been installed; I'll keep an eye on things."

30. Manpreet's connection to, and receipt of, the cash packages was also evidenced by text messages between Kuljeet and his sister, Harshdeep Kaur, with whom Kuljeet frequently discussed and coordinated the receipt and distribution of packages and large amounts of U.S. currency.

31. For instance, on June 23, 2026, Harshdeep and Kuljeet exchanged the following texts referring to payments made to the co-conspirators, including Manpreet.

Harshdeep:

- "Kuljeet, I have your $1,500, one $10,000, another $10,000, and the one NAVI brought. He took $5,000 from it. I also put $10,000

into the India money, and I added more money today."

- "I deducted today's $4,000 for NAVI and $2,000 for MANPREET. NAVI also had another $3,000."
- "There was $9,000 and I also have your $1,500."
- "There is approximately $20,500 sitting here."

Kuljeet:

- "The one picked up from my house. How much was that"

Harshdeep:

- "One had a full $10,000, and the other was short."
- "Now I remember we sent TOM's back and deducted MANPREET's money as well."
- "Now I have $20,500 of your money."
- "Because I added the money from the house."

Sacramento County Sheriff's Office Investigation

32. Beginning in approximately July 2026, the Sacramento County Sheriff's Office (SCSO) received information from a Security Manager at United Parcel Service (UPS) indicating that UPS had identified and interdicted several packages bound for 12277 Habitat Way, Rancho Cordova, CA 95742, Manpreet's address, which UPS had flagged for elder fraud based upon the timing and nature of the deliveries, which were earmarked as business packages, but in route to residential addresses with no verified business connections. UPS turned over 5

packages bound for 12277 Habitat Way, each of which contained cash ranging from $6,000 to $33,000. The senders of each of the packages were elderly individuals, and multiple of the individuals had subsequently filed polices report indicating they were the victim of fraud and had sent cash packages to the 12277 Habitat Way address.

33. On July 27, 2026, SCSO conducted surveillance at 12277 Habitat Way, during which they identified a Black Honda Accord bearing California license plate 9TNV848 and a White Honda Accord bearing California license plate 9TRK690 in the driveway – both of which were registered to Manpreet. Furthermore, a law enforcement database search listed Manpreet as a current occupant of the address.

34. Over the course of the next month, SCSO collected approximately 17 additional packages of cash interdicted by either UPS or SCSO's High Intensity Drug Trafficking Area (HIDTA) team that were bound for 12277 Habitat Way – all of which again appeared to be sent by elderly individuals.

CONCLUSION

35. Based upon the foregoing, there is probable cause to believe that Manpreet Singh did knowingly and willfully conspire to participate in a fraud

scheme using wire communications in interstate commerce in violation of Title 18, United States Code, Section 1349.

Brett Heil

Brett Heil, Special Agent
Federal Bureau of Investigation
Gainesville, Florida

Sworn to and subscribed before me
via telephone this 8th day of October 2026.

Midori A. Lowry

Midori A. Lowry
United States Magistrate Judge