

UNITED STATES DISTRICT COURT

for the

Western District of Michigan

FILED BY BM D.C.

Apr 1, 2025

ANGELA E. NOBLE
CLERK U.S. DIST. CT.
S. D. OF FLA. - MIAMI

United States of America

v.

DANIELLE REGINA DIARBAKERLY

Defendant

25-MJ-2636-SANCHEZ

Case No. 1:25-cr-5

Honorable Paul L. Maloney

U.S. District Court Judge

ARREST WARRANT

To: Any authorized law enforcement officer

YOU ARE COMMANDED to arrest and bring before a United States magistrate judge without unnecessary delay

(name of person to be arrested) DANIELLE REGINA DIARBAKERLY,

who is accused of an offense or violation based on the following document filed with the court:

- Indictment
- Superseding Indictment
- Information
- Superseding Information
- Complaint
- Probation Violation Petition
- Supervised Release Violation Petition
- Violation Notice
- Order of the Court

This offense is briefly described as follows:

18 U.S.C. § 1956(h) - Money Laundering Conspiracy



Date: 01/15/2025

Deputy Clerk _____

City and state: Grand Rapids, Michigan

Phillip J. Green, United States Magistrate Judge

Printed name and title

Return

This warrant was received on (date) _____, and the person was arrested on (date) _____
at (city and state) _____.

Date: _____

Arresting officer's signature

Printed name and title

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

25-MJ-2636-SANCHEZ

vs.

DANIELLE REGINA DIARBAKERLY,

Defendant.

INDICTMENT

_____ /

The Grand Jury charges:

(Money Laundering Conspiracy)

Between in or about January 2020 and September 2024, in the Southern Division of the Western District of Michigan and elsewhere,

DANIELLE REGINA DIARBAKERLY

knowingly combined, confederated and agreed with others known and unknown to the grand jury to conduct financial transactions affecting interstate and foreign commerce, knowing the transactions involved criminally derived property and which were the proceeds of a specified unlawful activity (mail and wire fraud in violation of 18 U.S.C. §§ 1341 and 1343) knowing that the transactions were designed in whole or in part to conceal and disguise the nature, location, source, ownership, and control of those proceeds.

Object of the Conspiracy

The object of the conspiracy was to obtain money via a fraudulent scheme and then conduct financial transactions using those funds to conceal and disguise the fact that those funds were derived from fraud, to conceal the location of those funds, and to conceal who thereafter owned and controlled those funds after they were obtained from victims.

Means and Methods

It was part of the conspiracy that DIARBAKERLY and others operated a mail and wire fraud scheme in which residents throughout the United States were contacted via telephone and email and falsely advised that they had won a multistate lottery and stood to claim large amounts of cash and high-value merchandise such as luxury automobiles. Victims were falsely advised that they would receive their winnings once they paid taxes and fees associated with the award.

Once persuaded that they had won, the victims of the fraudulent scheme were instructed to transmit their payments for "taxes" and "fees" to shell companies created by DIARBAKERLY for that purpose. These business entities were King Production LLC, Beacon Fulfillment LLC, A1 Distribution Center LLC, Apollo Elite Trading LLC, New Atlantic Agency LLC, Winwood Management Corp. and Wynwood Management LLC. The victims made their payments either via United States mail or through interstate wire transfers. Knowing the money represented the proceeds of unlawful activity, DIARBAKERLY would thereafter move the victims' money out of the recipient account and into other accounts she and other members of the conspiracy controlled. This was

done in part to conceal or disguise the nature, the location, the source, the ownership and the control of the proceeds of the fraud scheme.

In this manner, DIARBARKERLY and her coconspirators were able to obtain, transfer, and conceal over \$3,300,000 in fraud proceeds from their approximately 25 victims. None of the victims received anything in return. DIARBAKERLY's swift movement of the fraudulent proceeds out of the recipient accounts prevented the victims from retrieving their funds, disguised the location of the funds, and concealed who controlled them. Many of these financial transactions involving fraudulent proceeds were in excess of \$10,000. One of the victims of the scheme was J.G., a resident of Dowagiac, Michigan, who during August and September 2020 mailed two checks totaling \$150,000 to King Production LLC.

18 U.S.C. § 1956(h)

18 U.S.C. § 1956(a)(1)(B)(i)

18 U.S.C. § 1341

18 U.S.C. § 1343

FORFEITURE ALLEGATION
(Money Laundering)

The allegations contained in the offense charged in this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeitures pursuant to 18 U.S.C. § 982(a)(1).

Pursuant to 18 U.S.C. § 982(a)(1), upon conviction of an offense in violation of 18 U.S.C. § 1956(h), set forth in this Indictment, the defendant,

DANIELLE REGINA DIARBAKERLY,

shall forfeit to the United States of America any property, real or personal, involved in such offense, and any property traceable to such property. The property to be forfeited includes, but is not limited to, the following:

1. MONEY JUDGMENT: A sum of money equal to at least \$ 3,300,000, which represents the amount of money involved in the offense charged in the Indictment.

2. SUBSTITUTE ASSETS: If any of the property described 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 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 of America shall be entitled to forfeiture of substitute property pursuant to 21 U.S.C. § 853(p) as incorporated by 18 U.S.C. § 982(b).

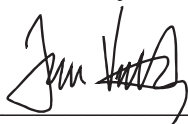
18 U.S.C. § 982(a)(1)
21 U.S.C. § 853(p)
18 U.S.C. § 982(b)
18 U.S.C. § 1956

A TRUE BILL

[/s/ Redacted]

MARK A. TOTTEN
United States Attorney

GRAND JURY FOREPERSON



TIMOTHY VERHEY
Assistant United States Attorney