

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

UNITED STATES OF AMERICA

v.

DINESH SAH

NO. 3:20-CR-484-S

**AMENDED¹ BILL OF PARTICULARS REGARDING PROPERTY SUBJECT TO
FORFEITURE**

The United States of America (the government), by the undersigned, pursuant to Federal Rule of Criminal Procedure 32.2(a), particularly alleges that the following property is subject to forfeiture on the basis of allegations set for in the Indictment filed in the above-captioned criminal case:

a. Bank Accounts

1. \$26,106.68 in funds seized from Neighborhood Credit Union account ending in -9614 on or about May 14, 2021, maintained in the name of Dinesh Sah;
2. \$250,000.00 in funds seized from JP Morgan Chase general ledger from wire reversal to closed account ending in -0206 on or about June 9, 2021, maintained in the name of Dinesh Sah;
3. \$200,064.30 in funds seized from Citibank general ledger from closed account ending in -0591 on or about June 25, 2021, maintained in the name of Dinesh Sah;

¹ This Amended Bill of Particulars updated and corrected number 17 through number 19.

4. The \$50,000.00 transferred on June 1, 2020 to account ending -0583 in the name of Dinesh Sah at Citibank, which may or may not still be contained in the account;
5. \$794,541.41 in funds seized from Technology Credit Union account ending in -7530 on or about March 9, 2021, maintained in the name of Chargedge, Inc. ;
6. \$399,062.83 in funds seized from Technology Credit Union account ending in -5183 on or about May 24, 2021, maintained in the name of Sanjaya Maniktala and Disha Maniktala;
7. The \$50,000 transferred on June 5, 2021 to account ending in -1107 in the name of Dinesh Sah at State Bank of India, which may or may not still be contained in the account;

b. Vehicle

8. A 2017 Audi A6 vehicle with (VIN# WAUF2AFC8HN104906) seized from the street on Clear Creek Lane, Coppell, TX on or about February 5, 2021;

c. Other Property

9. The \$130,000.00 in U.S. dollars transferred on August 27, 2020 to account 9864905790 in the name of Sagar Gohill at Wells Fargo Bank,

10. The \$120,000 in U.S. dollars transferred on August 24, 2020 to First Integrity Title Westminster CO for the purchase of the residential property located at 18856 W. 93rd Road, Arvada, Colorado 80007;
11. New York Life Insurance Company Whole Life Insurance Policy seized on or about February 9, 2021 for Insured Dinesh Sah (Policy # 45 332 755);
12. A timeshare (Unit GMP583217A1Z) seized from Grand Pacific MarBrisa Resort, 1594 MarBrisa Circle, Carlsbad, CA 92008 on or about March 11, 2021, purchased by Dinesh Sah and Anju Babbar;
13. \$50,000.00 in funds seized from American Legend Homes on or about February 23, 2021 for the purchase of the residential property located at 1367 Horsetail Place, Coppell, Texas 75019, by Dinesh Sah and Anju Babbar;
14. \$700,000.00 in funds seized from American Legend Homes on or about February 23, 2021 for the purchase of residential property located at 1388 Horsetail Place, Coppell, Texas 75019, by Dinesh Sah and Anju Babbar;
15. \$50,000.00 in funds seized from American Legend Homes on or about February 23, 2021 for the purchase of the residential property located at 1335 Wood Duck Drive, Coppell, Texas 75019, by Dinesh Sah and Anju Babbar;

16. \$50,000.00 in funds seized from American Legend Homes on or about February 23, 2021 for the purchase of the residential property located at 1324 Otter Way, Coppell, Texas 75019, by Dinesh Sah and Anju Babbar;
17. \$100,000.00 in funds seized from TiE SoCal Angels Fund 2020, LLC on or about February 23, 2021 for Dinesh Sah's interest in the fund;
18. \$1,500,000.00 in U.S. currency transferred on July 14, 2020 to beneficiary number 91002000807 in the name of Panin Hitech Solutions Pvt. Ltd. at the Axis Bank Limited, Mumbai India, which may or may not still be contained in that account;
19. \$1,500,000.00 in U.S. currency transferred on August 4, 2020 to beneficiary number 59209820983821 in the name of Panin Hitech Solutions, Pvt. Ltd. at the HDFC Bank Limited, Kanjur Marg East Mumbai India, which may or may not still be contained in that account;
20. Cash in the amount of \$1,500 located in a 2017 Cadillac XT5 (VIN# 1GYKNBRSXHZ101252) that was seized on September 18, 2020;
21. Cash in the amount of \$2,020 located on the person of Dinesh Sah upon his arrest on or about September 12, 2020;

The following other items were seized from 454 Clear Creek Drive, Coppell, Texas on or about September 12, 2020;

22. \$17,000.00 U.S. Currency;

23. Diamond bangle bracelet;
24. Ring with 3 diamonds (1 big one flanked by 2 smaller ones);
25. Silver ring with 3 diamonds in a row;
26. 50 gram gold bar - 24 carat;
27. 6 Gold Bracelets with silver accents;
28. Necklace & Earring set; pendant w/ a goddess; gold w/ black, red, & white beads;
29. Necklace & Earring set; gold w/ silver accents; long earrings;
30. 4 Diamond stud earrings; 1 single pearl earring w/ green & red stones;
31. Necklace & Earring set w/ gold chain & pendant in a Nautilus shape;
32. Necklace & Earring set: gold & silver chain w/ diamonds (bell shaped);
33. Necklace & Earring set: gold & diamonds; 2 squares;
34. Necklace & Earring set: gold & silver w/ 3 strands of silver beads;
35. Necklace & Earring set: gold w/ black beads on necklace; 3 squares w/ dangles;
36. Necklace & Earring set: gold & diamonds; heart-shaped;
37. Gold & Diamond Pendant; sun-shaped; 1/2 carat;
38. 3 gold rings;
39. Earrings: round w/ green, red, & silver;
40. Earrings in flower shape w/ red stone;
41. Gold stud earrings;
42. Matching pendant & earrings: gold & pearl horseshoe shape;

- 43. 4 gold chains;
- 44. Gold & diamond earrings in a clover shape;
- 45. 2 necklaces w/ ampersand shaped diamond pendants: 1 gold & 1 silver;
- 46. Necklace & earrings w/ gold beads;
- 47. Necklace & Earring set: gold w/ crystals in a flower shape;
- 48. 2 strand pearl necklace w/ pearl stud earrings;
- 49. 2 bracelets w/ gold & diamonds all around;
- 50. Silver pendant w/ diamond in a flower swirl shape;
- 51. Necklace & earring set: silver/diamonds in a snowflake shape;
- 52. Necklace & Earring set; gold w/ red stones & crystals in triangle shape;
- 53. Diamond Stud earrings;
- 54. Gold bracelet with diamonds & red stones.

The government may file supplemental bills of particulars as additional assets are identified and/or appraised. The government also reserves its rights to election of remedies regarding the disposition of the subject property as provided in law.

Respectfully submitted,

PRERAK SHAH
ACTING UNITED STATES ATTORNEY

/s/ Dimitri N. Rocha
DIMITRI N. ROCHA
Assistant United States Attorney
Florida Bar No. 693332
1100 Commerce Street, Third Floor
Dallas, Texas 75242-1699
Telephone: 214-659-8600
E-mail: dimitri.rocha@usdoj.gov

CERTIFICATE OF SERVICE

The undersigned Assistant United States Attorney certifies that in accordance with Fed. R. Civ. P. 5, LR 5.1, and Fed. R. Crim. P. 49, LCrR 49.2, and the Miscellaneous Order on Electronic Case Filing (ECF), the following document:

Amended Bill of Particulars Regarding Property Subject to Forfeiture

was served on July 13, 2021 pursuant to the district court's ECF system as to ECF filers.

/s/ Dimitri N. Rocha
DIMITRI N. ROCHA