

20 CR 78347

INDICTMENT NO. \_\_\_\_\_  
CASE NO. D19000068

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2020 DEC 9 AM 3:39

GENERAL BILL OF INDICTMENT

Bibb County Superior Court

ERICA WOODFORD, CLERK  
THE STATE OF GEORGIA  
BIBB COUNTY GEORGIA

V.

**NITAL "NICK" RAVAL,  
MANOJ "RAY" PATEL,  
BHUNICA AMBU,  
SAMIR PATEL,  
ZANKHANA PATEL,  
MUKESHKUMAR PATEL,  
RAHIM MCCARLEY,  
KUNJ PATEL,  
MANISHKUMAR PATEL,  
HIREN PATEL,  
PANTH PATEL,  
ENNIS ODOM,  
NIMISHABEN CHAUDHARI,  
PARTH PATEL,  
RONALD C. HUCKABY  
LARRY TODD MASHBURN**

The Grand Jurors selected, chosen and sworn for the County of Bibb, to-wit:

- (1) Yvonne Holmes, Foreman; (2) ~~Imani Alava-Carrion~~; (3) Carla D. Yawn; (4) Scott Emener; (5) Kelley Ryan Stewart; (6) ~~Gloria Griffin Pitts~~; (7) James McKay; (8) Anna Phillips; (9) ~~Drew Manning~~; (10) ~~Jonathan David Owens~~; (11) ~~Kerley Elbert~~; (12) Beverly E. Binford; (13) Ronald Brewer; (14) Tracey White; (15) Benjamin Torrey; (16) Courtney Jordan; (17) Kyle Chasen Smith; (18) ~~Paige Davis~~; (19) ~~Nakina Clark~~; (20) Lisa Stroud; (21) Richard A. Yarbrough; (22) ~~Patricia Holmes~~; (23) Melinda Lamar;

**COUNT I**

**INTRODUCTION**

That the **Defendants**, through a pattern of racketeering activity: (I) committed the crime of Prohibition of Illegal Gambling Businesses as defined in 18 U.S.C.S. Sec. 1955, which is defined as Racketeering Activity under O.C.G.A. Sec. 16-14-3 (5)(A)(xlii)(B) and (C); (II) committed the crime of Laundering of Monetary Instruments as defined in 18

U.S.C.S. Sec. 1956 and 18 U.S.C.S. Sec. 1961 (1), which is defined as Racketeering Activity under O.C.G.A. Sec. 16-14-3(5)(A)(xlii)(C); (III) committed the crime of Engaging in Monetary Transactions in Property Derived from Specified Unlawful Activity as defined in 18 U.S.C.S. Sec. 1957 and 18 U.S.C.S. Sec. 1961 (1), which is defined as Racketeering Activity under O.C.G.A. Sec. 16-14-3 (5)(A)(xlii)(C); (IV) committed the offense of False Swearing as defined in O.C.G.A. Sec. 16-10-71, which is defined as Racketeering Activity in O.C.G.A. Sec. 16-14-3 (5)(A)(xxv); (V) committed the offense of False Statements and Writings, Concealment of Facts, and Fraudulent Documents in Matters within the Jurisdiction of State or Political Subdivisions as defined in O.C.G.A. Sec. 16-10-20 which is defined as Racketeering Activity in O.C.G.A. Sec. 16-14-3 (5)(A)(xxii); and, (VI) committed the offense of Bribery as defined in O.C.G.A. Sec. 16-10-2 which is defined as Racketeering Activity under O.C.G.A. Sec. 16-14-3(5)(A)(xxi); in order to acquire or maintain, directly or indirectly, an interest in or control of any enterprise, real property, or personal property of any nature, including money.

### THE DEFENDANTS

The **Defendants** are **NITAL "NICK" RAVAL, MANOJ "RAY" PATEL, BHUNICA AMBU, SAMIR PATEL, ZANKHANA PATEL, MUKESHKUMAR PATEL, RAHIM MCCARLEY, KUNJ PATEL, MANISHKUMAR PATEL, HIREN PATEL, PANTH PATEL, ENNIS ODOM, NIMISHABEN CHAUDHARI, PARTH PATEL, RONALD C. HUCKABY and LARRY TODD MASHBURN,**

Of the above **Defendants**, those **Defendants** who are sometimes referred to collectively as Master License Holders (MLHs) are: **NITAL "NICK" RAVAL, MANOJ "RAY" PATEL, BHUNICA AMBU, SAMIR PATEL and ZANKHANA PATEL;**

Of the above **Defendants**, those **Defendants** who are sometimes referred to collectively as the store location owners or Location License Holders (LLHs) are:

**MUKESHKUMAR PATEL, RAHIM MCCARLEY, KUNJ PATEL, MANISHKUMAR PATEL, HIREN PATEL, PANTH PATEL, ENNIS ODOM AND NIMISHABEN CHAUDHARI;**

Whenever the phrase **Defendants** is used without specification it is referencing all of the **Defendants** named above.

The **Defendants**, **NITAL "NICK" RAVAL, MANOJ "RAY" PATEL, BHUNICA AMBU, SAMIR PATEL, ZANKHANA PATEL, MUKESHKUMAR PATEL, RAHIM MCCARLEY, KUNJ PATEL, MANISHKUMAR PATEL, HIREN PATEL, PANTH PATEL, ENNIS ODOM, NIMISHABEN CHAUDHARI, PARTH PATEL, RONALD C. HUCKABY and LARRY TODD MASHBURN,** through a pattern of racketeering activity or proceeds derived therefrom, acquired or maintained, directly or indirectly, an interest in or control of **The Enterprise**, including therein real property and personal property, of a varied nature, including money.

**THE ENTITIES COMPRISING THE ENTERPRISE**

The following entities are some, but not all, that comprise **The Enterprise**:

The corporations that are those of the **Defendant** Master License Holders (MLHs) or are directly owned or controlled by the MLHs and/or by **Defendant PARTH PATEL** are:

**Ahana Investments, Inc; Anjaneya Investments, Inc.; Booray Group, LLC; Krishna Amusement, Inc.; Miraya Ahana Irrevocable Trust; Myra Parth Irrevocable Trust; PNP Amusement Games, Inc.; N & S Investments, Inc.; S & W Amusements, Inc.; and Nishi & Jai, Inc. (H & R Block).**

Some of the store locations that are part of **The Enterprise** and which are owned or controlled by the **Defendant** LLHs and in which the **Defendant** MLHs had COAMS are:

**Prem Raton Dhan Payo, Inc.** located at 6606 Waters Ave., Savannah, GA; **Jay Ramdev 1, LLC d/b/a Pooler Lottery Mart** located at 1067 U.S. Highway 80E, Pooler, GA; **Prem Raton Dhan Payo, Inc.** located at 1057 U.S. Highway 80E, Pooler, GA; **Prem Raton Dhan Payo, Inc.** located at 10520 Abercorn St. Ste C, Savannah, GA; **Prem Raton Dhan Payo, Inc.** located at 109 Minis Ave. Ste A5, Garden City, GA; **Sultaan, Inc.** located at 1101 Eisenhower Dr., Savannah, GA; **Sultaan, Inc. d/b/a Lottery Machine Store 3** located at 816 Pennsylvania Ave., Savannah, GA; **Sultaan, Inc. d/b/a Parkwood Convenience Store** located at 2006 Parkwood Dr., Brunswick, GA; **Krishna Parth** located at 2304 Norwich St., Brunswick, GA.; **APMM Corporation** located at 408 W. Ogeechee St., Sylvania, GA.; **Babari, Inc.** located at 2110 Montgomery St. Unit C, Savannah, GA; **Macon Secured d/b/a RJS Food Mart** located at 2311 Pio Nono Ave., Macon, GA; **BMF East, LLC d/b/a Exxon Food Mart** located at 3170 Millerfield Rd., Macon, GA; **Atita, LLC** located at 4290 Dellwood Dr., Macon, GA; **1106 Rocky Creek d/b/a Quick Serve Food Mart** located at 1106 Rocky Creek Rd., Macon, GA; **SMP Patel, Inc. d/b/a Sunrise Stores** located at 3750 Mercer University Dr., Macon, GA; and, **Hartley Bridge Citgo, Inc.** located at 4535 Hartley Bridge Rd., Macon, GA.

Other store locations that are part of **The Enterprise** and in which **Defendant** MLHs had COAMs are:

**Jay Ambe Express, LLC** located at 376 W. Parker St., Baxley, GA; **DN12, Inc.** located at 22933 U.S. Highway 80E, Statesboro, GA.; **Krishna 002, Inc.** located at 4435 Skidaway Rd. Unit B, Savannah, GA.; **2 Gateway Blvd. East, LLC d/b/a Quick Stop #204** located at 2 Gateway Blvd. East, Suite 101, Savannah, GA.; **1450 West Bay St., LLC d/b/a Quick Stop #92** located at 1450 West Bay St., Savannah, GA.; **4801 Ogeechee Rd., LLC d/b/a Quick Stop #94** located at 4801 Ogeechee Rd., Savannah, GA.; **7101 Skidaway Rd., LLC d/b/a Quick Stop #71** located at 7101 Skidaway Rd., Savannah, GA; **Adi Shakti Trading 01, Inc.** located at 5 Gateway Blvd., Savannah, GA.; **Adi Shakti Trading, Inc. d/b/a Shell Food Mart** located at 1 Gateway Blvd.,

Savannah, GA.; **Kamdhenu 112, LLC d/b/a Kwik More** located at 6610 Waters Ave., Savannah, GA.; **Saachi, LLC d/b/a ALS Convenience Store** located at 7010 Skidaway Rd., Suite 8, Savannah, GA.; **Shipyard Investment, Inc. d/b/a Quick Stop #100** located at 108 Shipyard Rd., Savannah, GA.; **Tiger 7, Inc.** located at 4503 Montgomery St., Savannah, GA.; **Tubelight, Inc.** located at 1554 U.S. Hwy 80E, Suite A, Pooler, GA.; **Aisha, Inc. d/b/a EZ Quick Mart** located 5240 GA Hwy 196 W., Hinesville, GA.; **Dhruvm, Inc. d/b/a Fast Stop** located at 316 N. Veterans Blvd., Glennville, GA.; **Har Har Madev, Inc. d/b/a Stop & Shop** located at 15227 Hwy 17, Townsend, GA.; **Hemangi, Inc. d/b/a Roger Country Store** located at 947 A GA Hwy 144 East, Glennville, GA.; **Jai Ma Ambe 1, Inc. d/b/a El Cheapo #140** located at 4027 U.S. Hwy 280E, Pembroke, GA.; **KVRP, Inc. d/b/a 301 Store** located at 1103 S. Veterans Blvd., Glennville, GA.; **P & R Trading, Inc. d/b/a Chevron Food** located at 4036 U.S. Hwy 17, Richmond, GA.; **Haathi of GA, LLC d/b/a Liberty 3** located at 4366 Hwy 17, Guyton, GA.; **Jay Hari, Inc. d/b/a Jay Food Mart** located at 101 Kyle Sorrell Rd., Statesboro, GA.; **Om & Eva, Inc.** located at 10941 U.S. Hwy 301S, Statesboro, GA.; **Reema, Inc. d/b/a Dixie Food Store** located at 197 Northside Dr. East, Statesboro, GA.; **Rudra Krupa, Inc. d/b/a OK Food Mart** located at 656 Northside Dr., Statesboro, GA.; **Saishri Minimart, Inc. d/b/a Himan Mini Mart** located at 10929 Hwy 301S, Statesboro, GA.; **SDN 123, Inc.** located at 10929 Hwy. 301S, Suite 3, Statesboro, GA.; **Yugh Yash, Inc. d/b/a Buddy's Truck Stop** located at 8741 U.S. Hwy 301S, Statesboro, GA.; **Dadi, Inc. d/b/a Eagle Fuel** located at 755 N. 1<sup>st</sup> St., Jesup, GA.; **Empire Quick Stop, Inc.** located 3866 Waycross Hwy, Jesup, GA.; **Hirmi, LLC** located at 6090 Altama Ave., Brunswick, GA.; **Mokshprapti, Inc.** located at 376 W. Parker St., Baxley, GA.; **Raj Blackshear, LLC** located at 3021 Altama Ave., Brunswick, GA.; **Harry97, Inc. d/b/a Five Point** located at 772 GA Hwy 86E, Lyons, GA.; **Jay Madi JJSP, Inc.** located at 402 McIntosh St., Vidalia, GA.; **Arya K, Inc. d/b/a Discount Tobacco** located at 640 Wilkinson St., Milledgeville, GA.; **Jay Hanumaanji, Inc.** located at 2749 Barton Chapel Rd., Augusta, GA.; **MAA Harsiddhi Krups, Inc. d/b/a 41 Lottery Store** located at 2328 U.S. Hwy 41N, Suite 3, Perry, GA.; **Surya, Inc. d/b/a Sunoco Food Mart** located at 2315 Dallas Hwy SW, Marietta, GA.; and **Veer 2016, Inc.** located at 2905 Warm Springs Rd., Columbus, GA.

### BACKGROUND AND THE SCHEME

1. Gambling is illegal in the State of Georgia.
2. The legislature of Georgia enacted laws setting out exceptions to the illegality of gambling including the Georgia Lottery and bona fide Coin Operated Amusement Machines (COAMs).
3. The amendment to the Georgia Constitution proposed by the Georgia legislature providing for a state managed lottery was ratified by the Georgia voters in November of 1992. COAMs were declared lawful in Georgia by the legislature in 2013.
4. COAMS resemble "slot machines". Customers who play COAMs insert cash into the machine to gamble, select one of two or three games to play, place their bet and hit the play button. The customer has a chance to win or lose on every spin.

5. There are strict laws governing the use of COAMs and these are set out within both the gambling statutes of Georgia and in laws regulating the Georgia Lottery.
6. Beginning on July 1, 2015, The Georgia Lottery Commission (GLC) began supervision of COAMs through a centralized computer system (CCS) whereby the amount of money played on each individual COAM and the amount of any winnings were reported electronically to GLC. Previously the individual store locations, wherein the COAMs are placed, were required to self-report, on a monthly basis, this same information to the Georgia Department of Revenue.
7. When a customer plays the COAM at a store location, most of the stores use a device to electronically transmit gambling information such as bets and winnings to a central location typically behind the counter at the store. This allows the clerk to know how much the customer won, if any. These devices are illegal in Georgia according to the Official Code of Georgia.
8. It is illegal to pay cash to customers who have winnings on a COAM. Only store merchandise, with a value of not more than \$5 received for a single play, free replays, vouchers for that store's merchandise, again valued at \$5 or less for a single play or lottery tickets may be given. By law any winnings may not be redeemed for alcohol, tobacco or firearms.
9. At all times relevant, the **Defendants** did illegally pay cash to customers who played on the COAMs.
10. Paying cash to customers who have winnings on COAMs violates the laws of the State of Georgia.
11. At all times relevant, there were five or more **Defendants** who conducted, financed, managed, supervised, directed or owned the involved named businesses of **The Enterprise** and these same businesses had been in operation for over 30 days.
12. At all times relevant, the **Defendants** paid themselves the monies derived from the illegal gambling acts described herein.
13. Between January 1, 2017 and March 31, 2019, the **Defendant** store location owners and the other store locations in **The Enterprise** collected sales tax from the COAM customers on their store merchandise redemptions for winning.
14. Between January 1, 2017 and March 31, 2019, the **Defendant** store location owners and the other store locations in **The Enterprise** collected over \$3,000,000 in sales tax yet failed to remit this collected sales tax to the Department of Revenue for the State of Georgia.
15. In order to operate COAMs at a store location, the store location owner must apply for and receive, through the GLC (formerly the Department of Revenue), a COAM location license.
16. The store location owner must complete the application for said license and aver that all information contained therein is true and correct. Said licenses must be renewed annually.
17. In the license applications, the store owner must certify whether they are delinquent in any taxes owed to the State of Georgia.
18. All **Defendant** store location owners named as part of **The Enterprise**, on their 2018, 2019 and 2020 COAM location license applications, if applicable, made

- false statements and swore falsely that they were not delinquent in taxes owed to the State of Georgia.
19. The law in the State of Georgia provides that of the net proceeds from the COAMS, the State of Georgia would receive 5% in the first year COAMs were implemented and increase by 1% every fiscal year thereafter to a maximum of 10%. The store LLH and the MLH were to evenly split the remainder of the net proceeds.
  20. The store location owners obtain their COAMs from Master License Holders (MLH). The MLHs install and service the COAMs at the store locations. There must be a signed contract concerning this agreement between the store location license holder (LLH) and the MLH as required by Georgia law.
  21. Also, Georgia law requires that the MLH not have any interest in or with the store owner or operator, including owning the real estate where the store is located in which the MLH has COAMs.
  22. Between January 1, 2016 and July 2, 2019, the **Defendant** MLHs (or an entity they controlled) owned some of the real estate upon which were stores that had COAMs owned by the **Defendant** MLHs in them. In these situations, the **Defendant** LLHs or the owners of the store who were LLHs in **The Enterprise** paid rent to the **Defendant** MLH that owned the real estate.
  23. Between January 1, 2016 and July 2, 2019, the **Defendant** MLHs also had some **Defendant** LLHs and some owners of stores who were LLHs in **The Enterprise** who were acting as "straw men" or posing as the owner when in reality the **Defendant** MLH was both the owner of the store and LLH and said **Defendant** MLH received both the MLH and LLH percentage of the net proceeds from the COAMs.
  24. Like the LLH, the MLH must apply for their master license annually with the GLC. In said application the MLH must swear under oath to the truth and correctness of the application being submitted.
  25. The MLH must certify whether they are delinquent in any taxes owed to the State of Georgia. The MLH must also aver that no unfair methods of competition or unfair and deceptive acts have been used; that they have not provided anything of value to a store location owner or operator as an inducement to put COAMs in their store.
  26. Between January 1, 2016 and December 31, 2018, the MLH **Defendants** paid inducements to **Defendant** LLHs and/or store location owners or operators in **The Enterprise** in order to have them agree to put or keep said MLH **Defendant's** COAMs in their stores.
  27. The MLH **Defendants** made false reports and swore falsely on their 2018 and 2019 COAM applications when they averred they were not delinquent in taxes owed to the State of Georgia and/or they had not used unfair methods of competition or unfair and deceptive acts by providing anything of value to store owners or operators as an inducement to put COAMs in their store.
  28. The MLH **Defendants** filed false tax returns in 2016, 2017 and 2018, if applicable, with the State of Georgia, attaching thereto their corresponding federal tax return, underreporting their income by claiming fraudulent deductions.

29. Between January 1, 2017 and December 31, 2018, said MLH **Defendants** averred on their COAM applications in 2018 and 2019 that they were not delinquent in any taxes owed to the State of Georgia.
30. For 2017 and 2018 taxes (which correspond to the 2018 and 2019 COAM applications), the MLH **Defendants** are estimated to be delinquent in their corporate income taxes owed to the State of Georgia in the following amounts:
  - a. **BHUNICA AMBU and MANOJ 'RAY' PATEL for Booray Group, Inc.** in the amount of more than \$50,000.00.
  - b. **MANOJ "RAY" PATEL for Krishna Amusement Inc.** in the amount of more than \$100,000.00.
  - c. **ZANKHANA PATEL and MANOJ "RAY" PATEL for PNP Amusements, Inc.** in the amount of more than \$100,000.00.
  - d. **NITAL "NICK" RAVAL and SAMIR PATEL for S & W Amusements, Inc.** in the amount of more than \$100,000.00.
31. That for tax years 2017 and 2018 said **Defendants BHUNICA AMBU, MANOJ "RAY" PATEL and ZANKHANA PATEL** filed fraudulent corporate (**BHUNICA AMBU and MANOJ "RAY" PATEL for Booray Group, Inc.; MANOJ "RAY" PATEL for Krishna Amusement, Inc.; and, ZANKHANA PATEL and MANOJ "RAY" PATEL for PNP Amusements, Inc.**) and individual tax returns with both the federal government and the State of Georgia by underreporting their income by claiming fraudulent deductions.
32. Between January 1, 2017 and December 31, 2018 the **Defendants NITAL "NICK" RAVAL, MANOJ "RAY" PATEL, PARTH PATEL, BHUNICA AMBU, SAMIR PATEL AND ZANKHANA PATEL** transferred, deposited, withdrew or exchanged money through their various corporate business and individual bank accounts at Ameris, Synovus, Wells Fargo, B B & T and Heritage Bank, all of said banks being engaged in interstate commerce, in order to launder the money earned from unlawful gambling and to evade federal taxes and said **Defendants** used the unlawfully retained funds for the acquisition of real property and other tangible items of value.
33. Between January 1, 2017 and December 31, 2018 the **Defendants NITAL "NICK" RAVAL, MANOJ "RAY" PATEL, PARTH PATEL, BHUNICA AMBU, SAMIR PATEL AND ZANKHANA PATEL** did deposit, withdraw and transfer currency and money orders, criminally derived property that had values greater than \$10,000, through banks in the State of Georgia engaged in interstate commerce, Ameris, Synovus, Wells Fargo, BB & T and Heritage Bank, and said currency and money orders were derived from Gambling, an unlawful activity in the State of Georgia.
34. That for tax years 2016 and 2017 the **Defendant NITAL "NICK" RAVAL** used the H & R Block tax preparation company, Nishi & Jai, Inc., owned and operated by Defendant **SAMIR PATEL**, to prepare fraudulent corporate and individual tax returns wherein his income and that of his corporations: **Ahana Investments,**

- Inc., Miraya Investments, LLC, N & S Investments, Inc. and S & W Amusements, Inc.** (the latter two also owned by **Defendant SAMIR PATEL**) was underreported to the State of Georgia, which also had attached to it, as required, the federal tax return, by claiming fraudulent deductions.
35. The Defendant **NITAL "NICK" RAVAL** befriended **Defendant LARRY TODD MASHBURN** who was a captain in the Bulloch County Sheriff's Department, and between April 24, 2017 and December 31, 2017, gave said **Defendant LARRY TODD MASHBURN** benefits and gifts to which **Defendant LARRY TODD MASHBURN** was not entitled with the purpose of influencing **Defendant LARRY TODD MASHBURN** in the performance related to the functions of his employment, and said **Defendant LARRY TODD MASHBURN** did receive and accept said things of value including but not limited to loans and gifts of money, the use of **Defendant NITAL "NICK" RAVAL'S** vehicle(s), liquor and a watch. In exchange **Defendant LARRY TODD MASHBURN** provided **Defendant NITAL "NICK" RAVAL** with a Bulloch County Sheriff's Department deputy identification card and badge, assistance with traffic citations and additional law enforcement protection.
  36. The **Defendant NITAL "NICK" RAVAL** befriended **Defendant RONALD C. HUCKABY** who was an agent with the Department of Revenue for the State of Georgia, and purchased for **Defendant RONALD C. HUCKABY** American Airlines tickets for he and his wife, to fly on September 13, 2017 from Savannah, GA to Portland in the amount of \$485.60 per ticket, and purchased for **Defendant RONALD C. HUCKABY** American Airlines tickets for he and his wife, to fly on April 28, 2018 from Savannah, GA to Los Angeles, CA in the amount of \$302.50 per ticket. In exchange **Defendant RONALD C. HUCKABY** provided **Defendant NITAL "NICK" RAVAL** with confidential Department of Revenue information on **Defendant NITAL "NICK" RAVAL'S** business competitors.
  37. That the **Defendant SAMIR PATEL**, on the 2018 and 2019 MLH COAM applications for **S & W Amusements, Inc.**, made a false statement about being the 100% owner of **S & W Amusements, Inc.** and swore falsely to said applications.
  38. **Defendant NITAL "NICK" RAVAL** made a false statement to GLC when he submitted a Dispute Certification Form dated 4/30/18 stating there was no dispute between the master licensee, **S & W Amusements, Inc.**, and the location licensee, **Empire Quick Stop**.
  39. That there was a GLC administrative hearing before The Honorable Robert Wilson on January 8<sup>th</sup> and 9<sup>th</sup>, 2019, on a master license renewal denial to **S & W Amusements, Inc.** wherein both **Defendants SAMIR PATEL** and **NITAL "NICK" RAVAL**, after both being given a lawful oath, testified.
  40. During his testimony in said hearing, **Defendant SAMIR PATEL** made false statements in that he did swear that he was the 100% owner of **S & W Amusements, Inc.** from 2014-2019 and that **Defendant NITAL "NICK" RAVAL** had no equity interest in **S & W Amusements, Inc.**
  41. During his testimony in said Hearing, **Defendant NITAL "NICK" RAVAL** made false statements when he stated the "K-1" tax documents attached to the (original) corporate tax returns of **S & W Amusements, Inc.** were not accurately

showing him to be a shareholder, that he did not know the "K-1s" said he was a shareholder, and, that the W-2s on the amended returns were accurate.

42. During his testimony in said hearing, **Defendant NITAL "NICK" RAVAL** also made a false statement when he stated that **S & W Amusements, Inc.** bought the **Krishna Amusement, Inc.'s** COAMS when **S & W Amusements, Inc.** took over the **Empire Quick Stop** store location following **Krishna Amusement, Inc.'s** loss of its master license.

### **PATTERN OF RACKETEERING ACTIVITY**

That the **Defendants, NITAL "NICK" RAVAL, MANOJ "RAY" PATEL, BHUNICA AMBU, SAMIR PATEL, ZANKHANA PATEL, MUKESHKUMAR PATEL, RAHIM MCCARLEY, KUNJ PATEL, MANISHKUMAR PATEL, HIREN PATEL, PANTH PATEL, ENNIS ODOM, NIMISHABEN CHAUDHARI, PARTH PATEL, RONALD C. HUCKABY and LARRY TODD MASHBURN,** engaged in at least two predicate acts of racketeering activity listed below in furtherance of one or more incidents, schemes, or transactions that have the same or similar intents, results, accomplices, victims, or methods of commission or otherwise are interrelated by distinguishing characteristics and are not isolated incidents, with at least one predicate act occurring in Bibb County, Georgia; and at least one of said acts occurring after July 1, 1980 and that the last of such acts occurred within four years after the commission of a prior act of racketeering activity.

### **RACKETEERING ACTIVITY-PREDICATE ACTS**

That the **Defendants: NITAL "NICK" RAVAL, MANOJ "RAY" PATEL, PARTH PATEL, BHUNICA AMBU, SAMIR PATEL, ZANKHANA PATEL, MUKESHKUMAR PATEL, RAHIM MCCARLEY, KUNJ PATEL, MANISHKUMAR PATEL, HIREN PATEL, PANTH PATEL, ENNIS ODOM, NIMISHABEN CHAUDHARI, RONALD C. HUCKABY and LARRY TODD MASHBURN,** did commit the following criminal offenses by performing at least 2 of the following predicate acts of racketeering activity:

#### **PROHIBITION OF ILLEGAL GAMBLING BUSINESSES**

AS DEFINED IN 18 U.S.C.S. Sec. 1955

RICO UNDER O.C.G.A. SEC. 16-14-3 (5)(A)(xlii)(B) and (C)

1. That on or about April 10, 2019, the **Defendants RAHIM MCCARLEY, NITAL "NICK" RAVAL AND SAMIR PATEL,** through a pattern of racketeering activity, committed the offense of Prohibition of Illegal Gambling Businesses, by paying, or allowing a

person acting on their behalf to pay, \$15 cash to a customer for winnings on a COAM, as detailed in Count 3 of this indictment, in Bibb County, Georgia, said act being a violation of the gambling law of the State of Georgia, O.C.G.A. Sec. 16-12-35 (g), and in violation of 18 U.S.C.S. Sec. 1955, there were five or more of said **Defendants** or other co-conspirators whose identity is unknown to this Grand Jury, that did conduct, finance, manage, supervise, direct or own all or part of said illegal gambling business and said business had been or remained in substantially continuous operation for a period in excess of thirty days.

2. That on or about April 11, 2019, the **Defendants RAHIM MCCARLEY, NITAL "NICK" RAVAL AND SAMIR PATEL**, through a pattern of racketeering activity, committed the offense of Prohibition of Illegal Gambling Businesses, by paying, or allowing a person acting on their behalf to pay, \$40 and \$60 cash to a customer(s) for winnings on a COAM, as detailed in Count 4 of this indictment, in Bibb County, Georgia, said act being a violation of the gambling law of the State of Georgia, O.C.G.A. Sec. 16-12-35 (g), and in violation of 18 U.S.C.S. Sec. 1955, there were five or more of said **Defendants** or other co-conspirators whose identity is unknown to this Grand Jury, that did conduct, finance, manage, supervise, direct or own all or part of said illegal gambling business and said business had been or remained in substantially continuous operation for a period in excess of thirty days.
3. That on or about June 20, 2019, the **Defendants RAHIM MCCARLEY, NITAL "NICK" RAVAL AND SAMIR PATEL**, through a pattern of racketeering activity, committed the offense of Prohibition of Illegal Gambling Businesses, by paying, or allowing a person acting on their behalf to pay, \$40 cash to a customer for winnings on a COAM, as detailed in Count 5 of this indictment, in Bibb County, Georgia, said act being a violation of the gambling law of the State of Georgia, O.C.G.A. Sec. 16-12-35 (g), and in violation of 18 U.S.C.S. Sec. 1955, there were five or more of said **Defendants** or other co-conspirators whose identity is unknown to this Grand Jury, that did conduct, finance, manage, supervise, direct or own all or part of said illegal gambling business and said business had been or remained in substantially continuous operation for a period in excess of thirty days.
4. That on or about July 2, 2019, the **Defendants RAHIM MCCARLEY, NITAL "NICK" RAVAL AND SAMIR PATEL**, through a pattern of racketeering activity, committed the offense of Prohibition of Illegal Gambling Businesses, by paying, or allowing a person acting on their behalf to pay, \$35 cash to a customer for winnings on a COAM, as detailed in Count 6 of this indictment, in Bibb County, Georgia, said act being a violation of the gambling law of the State of Georgia, O.C.G.A. Sec. 16-12-35 (g), and in violation

of 18 U.S.C.S. Sec. 1955, there were five or more of said **Defendants** or other co-conspirators whose identity is unknown to this Grand Jury, that did conduct, finance, manage, supervise, direct or own all or part of said illegal gambling business and said business had been or remained in substantially continuous operation for a period in excess of thirty days.

5. That on or about April 11, 2019, the **Defendants KUNJ PATEL, NITAL "NICK" RAVAL AND SAMIR PATEL**, through a pattern of racketeering activity, committed the offense of Prohibition of Illegal Gambling Businesses, by paying, or allowing a person acting on their behalf to pay, \$80 cash to a customer for winnings on a COAM, as detailed in Count 7 of this indictment, in Bibb County, Georgia, said act being a violation of the gambling law of the State of Georgia, O.C.G.A. Sec. 16-12-35 (g), and in violation of 18 U.S.C.S. Sec. 1955, there were five or more of said **Defendants** or other co-conspirators whose identity is unknown to this Grand Jury, that did conduct, finance, manage, supervise, direct or own all or part of said illegal gambling business and said business had been or remained in substantially continuous operation for a period in excess of thirty days.
6. That on or about June 20, 2019, the **Defendants MANISHKUMAR PATEL, NITAL "NICK" RAVAL AND SAMIR PATEL**, through a pattern of racketeering activity, committed the offense of Prohibition of Illegal Gambling Businesses, by paying, or allowing a person acting on their behalf to pay, \$20 cash to a customer for winnings on a COAM, as detailed in Count 8 of this indictment, in Bibb County, Georgia, said act being a violation of the gambling law of the State of Georgia, O.C.G.A. Sec. 16-12-35 (g), and in violation of 18 U.S.C.S. Sec. 1955, there were five or more of said **Defendants** or other co-conspirators whose identity is unknown to this Grand Jury, that did conduct, finance, manage, supervise, direct or own all or part of said illegal gambling business and said business had been or remained in substantially continuous operation for a period in excess of thirty days.
7. That on or about July 2, 2019, the **Defendants MANISHKUMAR PATEL, NITAL "NICK" RAVAL AND SAMIR PATEL**, through a pattern of racketeering activity, committed the offense of Prohibition of Illegal Gambling Businesses, by paying, or allowing a person acting on their behalf to pay, \$20 and \$40 cash to a customer(s) for winnings on a COAM, as detailed in Count 9 of this indictment, in Bibb County, Georgia, said act being a violation of the gambling law of the State of Georgia, O.C.G.A. Sec. 16-12-35 (g), and in violation of 18 U.S.C.S. Sec. 1955, there were five or more of said **Defendants** or other co-conspirators whose identity is unknown to this Grand Jury, that did conduct, finance, manage, supervise, direct or own all or part of said illegal gambling business and said

- business had been or remained in substantially continuous operation for a period in excess of thirty days.
8. That on or about April 10, 2019, the **Defendants HIREN PATEL, NITAL "NICK" RAVAL AND SAMIR PATEL**, through a pattern of racketeering activity, committed the offense of Prohibition of Illegal Gambling Businesses, by paying, or allowing a person acting on their behalf to pay, \$20 and \$15 cash to a customer(s) for winnings on a COAM, as detailed in Count 10 of this indictment, in Bibb County, Georgia, said act being a violation of the gambling law of the State of Georgia, O.C.G.A. Sec. 16-12-35 (g), and in violation of 18 U.S.C.S. Sec. 1955, there were five or more of said **Defendant** or other co-conspirators whose identity is unknown to this Grand Jury, that did conduct, finance, manage, supervise, direct or own all or part of said illegal gambling business and said business had been or remained in substantially continuous operation for a period in excess of thirty days.
  9. That on or about April 11, 2019, the **Defendants HIREN PATEL, NITAL "NICK" RAVAL AND SAMIR PATEL**, through a pattern of racketeering activity, committed the offense of Prohibition of Illegal Gambling Businesses, by paying, or allowing a person acting on their behalf to pay, \$20 and \$20 cash to a customer(s) for winnings on a COAM, as detailed in Count 11 of this indictment, in Bibb County, Georgia, said act being a violation of the gambling law of the State of Georgia, O.C.G.A. Sec. 16-12-35 (g), and in violation of 18 U.S.C.S. Sec. 1955, there were five or more of said **Defendants** or other co-conspirators whose identity is unknown to this Grand Jury, that did conduct, finance, manage, supervise, direct or own all or part of said illegal gambling business and said business had been or remained in substantially continuous operation for a period in excess of thirty days.
  10. That on or about June 20, 2019, the **Defendants HIREN PATEL, NITAL "NICK" RAVAL AND SAMIR PATEL**, through a pattern of racketeering activity, committed the offense of Prohibition of Illegal Gambling Businesses, by paying, or allowing a person acting on their behalf to pay, \$20 cash to a customer for winnings on a COAM, as detailed in Count 12 of this indictment, in Bibb County, Georgia, said act being a violation of the gambling law of the State of Georgia, O.C.G.A. Sec. 16-12-35 (g), and in violation of 18 U.S.C.S. Sec. 1955, there were five or more of said **Defendants** or other co-conspirators whose identity is unknown to this Grand Jury, that did conduct, finance, manage, supervise, direct or own all or part of said illegal gambling business and said business had been or remained in substantially continuous operation for a period in excess of thirty days.
  11. That on or about July 2, 2019, the **Defendants HIREN PATEL, NITAL "NICK" RAVAL AND SAMIR PATEL**, through a

pattern of racketeering activity, committed the offense of Prohibition of Illegal Gambling Businesses, by paying, or allowing a person acting on their behalf to pay, \$40 and \$30 cash to a customer(s) for winnings on a COAM, as detailed in Count 13 of this indictment, in Bibb County, Georgia, said act being a violation of the gambling law of the State of Georgia, O.C.G.A. Sec. 16-12-35 (g), and in violation of 18 U.S.C.S. Sec. 1955, there were five or more of said **Defendants** or other co-conspirators whose identity is unknown to this Grand Jury, that did conduct, finance, manage, supervise, direct or own all or part of said illegal gambling business and said business had been or remained in substantially continuous operation for a period in excess of thirty days.

12. That between January 1, 2016 and July 2, 2019 the **Defendants NITAL "NICK" RAVAL, MANOJ "RAY" PATEL, BHUNICA AMBU, SAMIR PATEL, ZANKHANA PATEL, MUKESHKUMAR PATEL, RAHIM MCCARLEY, KUNJ PATEL, MANISHKUMAR PATEL, HIREN PATEL, PANTH PATEL, ENNIS ODOM, NIMISHABEN CHAUDHARI, PARTH PATEL, RONALD C. HUCKABY and LARRY TODD MASHBURN**, through a pattern of racketeering activity, committed the offense of Prohibition of Illegal Gambling Businesses, by conducting, financing, managing, supervising, directing or owning all or part of an illegal gambling business described as **The Enterprise** as it had activity that was a violation of the gambling law of the State of Georgia, O.C.G.A. Sec. 16-12-35 (g) and in violation of 18 U.S.C.S. Sec. 1955, said business involved five or more persons who conducted, financed, managed, supervised, directed or owned all or part of such business which had been or remained in substantially continuous operation for a period in excess of thirty days.

**LAUNDERING OF MONETARY INSTRUMENTS**  
AS DEFINED IN 18 U.S.C.S. Sec. 1956  
RICO UNDER O.C.G.A. SEC. 16-14-3 (5)(A)(xlii)(C)

13. That between January 1, 2017 and December 31, 2017, the **Defendants NITAL "NICK" RAVAL, MANOJ "RAY" PATEL, PARTH PATEL, BHUNICA AMBU, SAMIR PATEL AND ZANKHANA PATEL** through a pattern of racketeering activity committed Laundering of Monetary Instruments when the **Defendants NITAL "NICK" RAVAL, MANOJ "RAY" PATEL, PARTH PATEL, BHUNICA AMBU, SAMIR PATEL AND ZANKHANA PATEL**, knowing that the currency, checks and monetary instruments involved in financial transactions at the banks they used, Ameris, Synovus, Wells Fargo, BB & T and The Heritage Bank, all of which are engaged in interstate commerce, represented the proceeds of some form of unlawful activity, Gambling, with intent

to engage in conduct constituting a violation of 26 U.S.C.S. Sec. 7201 Attempt to Evade of Defeat Tax or, knowing the transactions were designed in whole or in part to conceal or disguise the nature, the location, the source, the ownership, or the control of the proceeds of specified unlawful activity, Gambling, said financial transactions being more specifically identified in Exhibit A of this indictment, attached hereto, is incorporated into and made a part of this pleading, hereinafter referred to as "Exhibit A" of this indictment.

14. That between January 1, 2018 and December 31, 2018, the **Defendants NITAL "NICK" RAVAL, MANOJ "RAY" PATEL, PARTH PATEL, BHUNICA AMBU, SAMIR PATEL AND ZANKHANA PATEL**, through a pattern of racketeering activity committed Laundering of Monetary Instruments when the **Defendants NITAL "NICK" RAVAL, MANOJ "RAY" PATEL, PARTH PATEL, BHUNICA AMBU, SAMIR PATEL, AND ZANKHANA PATEL** knowing that the currency, checks and monetary instruments involved in financial transactions at the banks they used, Ameris, Synovus, Wells Fargo, BB & T and The Heritage Bank, all of which are engaged in interstate commerce, represented the proceeds of some form of unlawful activity, Gambling, with intent to engage in conduct constituting a violation of 26 U.S.C.S. Sec. 7201 Attempt to Evade of Defeat Tax or, knowing the transactions were designed in whole or in part to conceal or disguise the nature, the location, the source, the ownership, or the control of the proceeds of specified unlawful activity, Gambling, said financial transactions being more specifically identified in Exhibit B of this indictment, attached hereto, is incorporated into and made a part of this pleading, hereinafter referred to as "Exhibit B" of this indictment.

**ENGAGING IN MONETARY TRANSACTIONS IN PROPERTY  
DERIVED FROM SPECIFIED UNLAWFUL ACTIVITY**

AS DEFINED IN 18 U.S.C.S. Sec. 1957

RICO UNDER O.C.G.A. SEC. 16-14-3 (5)(A)(xlii)(B) and(C)

15. That between January 1, 2017 and December 31, 2017 the **Defendants NITAL "NICK" RAVAL, MANOJ "RAY" PATEL, PARTH PATEL, BHUNICA AMBU, SAMIR PATEL AND ZANKHANA PATEL**, through a pattern of racketeering activity, committed Engaging in Monetary Transactions in Property Derived from Specified Unlawful Activity, in the State of Georgia, within the United States, did knowingly engage in monetary transactions, listed in Exhibit A of this indictment, attached hereto, and by reference hereto, is incorporated into and made a part of this pleading, hereinafter referred to as "Exhibit A" of this indictment, in criminally

derived property that had a value greater than \$10,000 and was derived from specified unlawful activity, Gambling, by depositing, withdrawing and transferring currency and money orders through banks, Ameris, Synovus, Wells Fargo, BB & T and The Heritage Bank, engaged in interstate commerce.

16. That between January 1, 2018 and December 31, 2018 the **Defendants NITAL "NICK" RAVAL, MANOJ "RAY" PATEL, PARTH PATEL, BHUNICA AMBU, SAMIR PATEL AND ZANKHANA PATEL**, through a pattern of racketeering activity, committed Engaging in Monetary Transactions in Property Derived from Specified Unlawful Activity, in the State of Georgia, within the United States, did knowingly engage in monetary transactions, listed in Exhibit B of this indictment, attached hereto, and by reference hereto, is incorporated into and made a part of this pleading, hereinafter referred to as "Exhibit B" of this indictment, in criminally derived property that had a value greater than \$10,000 and was derived from specified unlawful activity, Gambling, by depositing, withdrawing and transferring currency and money orders through banks, Ameris, Synovus, Wells Fargo, BB & T and The Heritage Bank, engaged in interstate commerce.

#### FALSE SWEARING

AS DEFINED IN O.C.G.A. SEC. 16-10-71

RICO UNDER O.C.G.A. SEC. 16-14-3 (5)(A)(xxv)

17. That on or about May 4, 2017, **Defendant MUKESHKUMAR PATEL**, through a pattern of racketeering activity, did commit the offense of False Swearing in violation of O.C.G.A. Sec. 16-10-71 when he executed a COAM application for License Year 2018 to the Georgia Lottery Commission, for **Sultaan, Inc. d/b/a Lottery Machine Store 3** located at 816 Pennsylvania Ave., Savannah, Georgia, knowing that it purports to be an acknowledgement of a lawful oath or affirmation, being a matter other than a judicial proceeding, and knowingly and willfully made a false statement, that he was not delinquent in taxes owed to the State of Georgia.
18. That on or about May 3, 2018, **Defendant MUKESHKUMAR PATEL**, through a pattern of racketeering activity, did commit the offense of False Swearing in violation of O.C.G.A. Sec. 16-10-71 when he executed a COAM application for License Year 2019 to the Georgia Lottery Commission, for **Sultaan, Inc. d/b/a Lottery Machine Store 3** located at 816 Pennsylvania Ave., Savannah, Georgia, knowing that it purports to be an acknowledgement of a lawful oath or affirmation, being a matter other than a judicial

- proceeding, and knowingly and willfully made a false statement, that he was not delinquent in taxes owed to the State of Georgia.
19. That on or about May 4, 2017, **Defendant MUKESHKUMAR PATEL**, through a pattern of racketeering activity, did commit the offense of False Swearing, in violation of O.C.G.A. Sec. 16-10-71 when he executed a COAM application for License Year 2018 to the Georgia Lottery Commission, for **Sultaan, Inc.** located at 1101 Eisenhower Dr., Savannah, Georgia, knowing that it purports to be an acknowledgement of a lawful oath or affirmation, being a matter other than a judicial proceeding, and knowingly and willfully made a false statement, that he was not delinquent in taxes owed to the State of Georgia.
  20. That on or about May 3, 2018, **Defendant MUKESHKUMAR PATEL**, through a pattern of racketeering activity, did commit the offense of False Swearing, in violation of O.C.G.A. Sec. 16-10-71 when he executed a COAM application for License Year 2019 to the Georgia Lottery Commission, for **Sultaan, Inc.** located at 1101 Eisenhower Dr., Savannah, Georgia, knowing that it purports to be an acknowledgement of a lawful oath or affirmation, being a matter other than a judicial proceeding, and knowingly and willfully made a false statement, that he was not delinquent in taxes owed to the State of Georgia.
  21. That on or about May 3, 2017, **Defendant MUKESHKUMAR PATEL**, through a pattern of racketeering activity, did commit the offense of False Swearing, in violation of O.C.G.A. Sec. 16-10-71 when he executed a COAM application for License Year 2018 to the Georgia Lottery Commission, for **Prem Ratan Dhan Payo, Inc.** located at 6606 Waters Ave., Savannah, Georgia, knowing that it purports to be an acknowledgement of a lawful oath or affirmation, being a matter other than a judicial proceeding, and knowingly and willfully made a false statement, that he was not delinquent in taxes owed to the State of Georgia.
  22. That on or about May 3, 2018, **Defendant MUKESHKUMAR PATEL**, through a pattern of racketeering activity, did commit the offense of False Swearing, in violation of O.C.G.A. Sec. 16-10-71 when he executed a COAM application for License Year 2019 to the Georgia Lottery Commission, for **Prem Ratan Dhan Payo, Inc.** located at 6606 Waters Ave., Savannah, Georgia, knowing that it purports to be an acknowledgement of a lawful oath or affirmation, being a matter other than a judicial proceeding, and knowingly and willfully made a false statement, that he was not delinquent in taxes owed to the State of Georgia.
  23. That on or about July 19, 2017, **Defendant MUKESHKUMAR PATEL**, through a pattern of racketeering activity, did commit the offense of False Swearing, in violation of O.C.G.A. Sec. 16-10-71 when he executed a COAM for License Year 2018 application to the

- Georgia Lottery Commission, for **Prem Ratan Dhan Payo, Inc. d/b/a Lottery Machine Store** located at 10520 Abercorn St. Ste C, Savannah, Georgia, knowing that it purports to be an acknowledgement of a lawful oath or affirmation, being a matter other than a judicial proceeding, and knowingly and willfully made a false statement, that he was not delinquent in taxes owed to the State of Georgia.
24. That on or about May 3, 2018, **Defendant MUKESHKUMAR PATEL**, through a pattern of racketeering activity, did commit the offense of False Swearing, in violation of O.C.G.A. Sec. 16-10-71 when he executed a COAM application for License Year 2019 to the Georgia Lottery Commission, for **Prem Ratan Dhan Payo, Inc. d/b/a Lottery Machine Store** located at 10520 Abercorn St. Ste C, Savannah, Georgia, knowing that it purports to be an acknowledgement of a lawful oath or affirmation, being a matter other than a judicial proceeding, and knowingly and willfully made a false statement, that he was not delinquent in taxes owed to the State of Georgia.
25. That on or about May 3, 2017, **Defendant MUKESHKUMAR PATEL**, through a pattern of racketeering activity, did commit the offense of False Swearing, in violation of O.C.G.A. Sec. 16-10-71 when he executed a COAM application or License Year 2018 to the Georgia Lottery Commission for **Prem Ratan Dhan Payo, Inc. d/b/a Lottery Machine Store** located at 1057 U.S. Highway 80E, Pooler, Georgia, knowing that it purports to be an acknowledgement of a lawful oath or affirmation, being a matter other than a judicial proceeding, and knowingly and willfully made a false statement, that he was not delinquent in taxes owed to the State of Georgia.
26. That on or about May 3, 2018, **Defendant MUKESHKUMAR PATEL**, through a pattern of racketeering activity, did commit the offense of False Swearing, in violation of O.C.G.A. Sec. 16-10-71 when he executed a COAM application for License Year 2019 to the Georgia Lottery Commission, for **Prem Ratan Dhan Payo, Inc. d/b/a Lottery Machine Store** located at 1057 U.S. Highway 80E, Pooler, Georgia, knowing that it purports to be an acknowledgement of a lawful oath or affirmation, being a matter other than a judicial proceeding, and knowingly and willfully made a false statement, that he was not delinquent in taxes owed to the State of Georgia.
27. That on or about May 4, 2017, **Defendant MUKESHKUMAR PATEL**, through a pattern of racketeering activity, did commit the offense of False Swearing, in violation of O.C.G.A. Sec. 16-10-71 when he executed a COAM application for License Year 2018 to the Georgia Lottery Commission, for **Sultaan, Inc. d/b/a Parkwood Convenience**, located at 2006 Parkwood Dr., Brunswick, Georgia, knowing that it purports to be an acknowledgement of a lawful oath or affirmation, being a matter other than a judicial proceeding, and

- knowingly and willfully made a false statement, that he was not delinquent in taxes owed to the State of Georgia.
28. That on or about May 3, 2018, **Defendant MUKESHKUMAR PATEL**, through a pattern of racketeering activity, did commit the offense of False Swearing, in violation of O.C.G.A. Sec. 16-10-71 when he executed a COAM application for License Year 2019 to the Georgia Lottery Commission, for **Sultaan, Inc. d/b/a Parkwood Convenience**, located at 2006 Parkwood Dr., Brunswick, Georgia, knowing that it purports to be an acknowledgement of a lawful oath or affirmation, being a matter other than a judicial proceeding, and knowingly and willfully made a false statement, that he was not delinquent in taxes owed to the State of Georgia.
29. That on or about June 27, 2018, **Defendant NIMISHABEN CHAUDHARI**, through a pattern of racketeering activity, did commit the offense of False Swearing, in violation of O.C.G.A. Sec. 16-10-71 when he executed a COAM application for License Year 2019 to the Georgia Lottery Commission, for **Barbari, LLC**, located at 2110 Montgomery St. Unit C, Savannah, Georgia, knowing that it purports to be an acknowledgement of a lawful oath or affirmation, being a matter other than a judicial proceeding, and knowingly and willfully made a false statement, that he was not delinquent in taxes owed to the State of Georgia.
30. That on or about May 16, 2019, **Defendant NIMISHABEN CHAUDHARI**, through a pattern of racketeering activity, did commit the offense of False Swearing, in violation of O.C.G.A. Sec. 16-10-71 when he executed a COAM application for License Year 2020 to the Georgia Lottery Commission, for **Barbari, LLC**, located at 2110 Montgomery St. Unit C, Savannah, Georgia, knowing that it purports to be an acknowledgement of a lawful oath or affirmation, being a matter other than a judicial proceeding, and knowingly and willfully made a false statement, that he was not delinquent in taxes owed to the State of Georgia.
31. That on or about May 7, 2018, **Defendant NIMISHABEN CHAUDHARI**, through a pattern of racketeering activity, did commit the offense of False Swearing, in violation of O.C.G.A. Sec. 16-10-71 when he executed a COAM application for License Year 2019 to the Georgia Lottery Commission, for **Jay Ramdev 1, LLC d/b/a Pooler Lottery Mart** located at 1067 U.S. Hwy 80E, Pooler, Georgia, knowing that it purports to be an acknowledgement of a lawful oath or affirmation, being a matter other than a judicial proceeding, and knowingly and willfully made a false statement, that he was not delinquent in taxes owed to the State of Georgia.
32. That on or about June 22, 2018, **Defendant MANISHKUMAR PATEL**, through a pattern of racketeering activity, did commit the offense of False Swearing, in violation of O.C.G.A. Sec. 16-10-71 when he executed a COAM application for License Year 2019 to the

- Georgia Lottery Commission, for **Atita, LLC** located at 4290 Dellwood Dr., Macon, Georgia, knowing that it purports to be an acknowledgement of a lawful oath or affirmation, being a matter other than a judicial proceeding, and knowingly and willfully made a false statement, that he was not delinquent in taxes owed to the State of Georgia as detailed in Count 16 of this indictment, in Bibb County, Georgia.
33. That on or about June 3, 2019 **Defendant MANISHKUMAR PATEL**, through a pattern of racketeering activity, did commit the offense of False Swearing, in violation of O.C.G.A. Sec. 16-10-71 when he executed a COAM application for License Year 2020 to the Georgia Lottery Commission, for **Atita, LLC** located at 4290 Dellwood Dr., Macon, Georgia, knowing that it purports to be an acknowledgement of a lawful oath or affirmation, being a matter other than a judicial proceeding, and knowingly and willfully made a false statement, that he was not delinquent in taxes owed to the State of Georgia as detailed in Count 17 of this indictment, in Bibb County, Georgia.
34. That on or about May 2, 2017, **Defendant KUNJ PATEL**, through a pattern of racketeering activity, did commit the offense of False Swearing, in violation of O.C.G.A. Sec. 16-10-71 when he executed a COAM application for License Year 2018 to the Georgia Lottery Commission, for **BMF East, LLC d/b/a Exxon Food Mart** located at 3170 Millerfield Rd., Macon, Georgia, knowing that it purports to be an acknowledgement of a lawful oath or affirmation, being a matter other than a judicial proceeding, and knowingly and willfully made a false statement, that he was not delinquent in taxes owed to the State of Georgia as detailed in Count 18 of this indictment, in Bibb County, Georgia.
35. That on or about May 8, 2018, **Defendant KUNJ PATEL**, through a pattern of racketeering activity, did commit the offense of False Swearing, in violation of O.C.G.A. Sec. 16-10-71 when he executed a COAM application for License Year 2019 to the Georgia Lottery Commission, for **BMF East, LLC d/b/a Exxon Food Mart** located at 3170 Millerfield Rd., Macon, Georgia, knowing that it purports to be an acknowledgement of a lawful oath or affirmation, being a matter other than a judicial proceeding, and knowingly and willfully made a false statement, that he was not delinquent in taxes owed to the State of Georgia as detailed in Count 19 of this indictment, in Bibb County, Georgia.
36. That on or about May 9, 2019, **Defendant KUNJ PATEL**, through a pattern of racketeering activity, did commit the offense of False Swearing, in violation of O.C.G.A. Sec. 16-10-71 when he executed a COAM application for License Year 2020 to the Georgia Lottery Commission, for **BMF East, LLC d/b/a Exxon Food Mart** located at 3170 Millerfield Rd., Macon, Georgia, knowing that it purports to

- be an acknowledgement of a lawful oath or affirmation, being a matter other than a judicial proceeding, and knowingly and willfully made a false statement, that he was not delinquent in taxes owed to the State of Georgia as detailed in Count 20 of this indictment, in Bibb County, Georgia.
37. That on or about May 11, 2017, **Defendant HIREN PATEL**, through a pattern of racketeering activity, did commit the offense of False Swearing, in violation of O.C.G.A. Sec. 16-10-71 when he executed a COAM application for License Year 2018 to the Georgia Lottery Commission, for **1106 Rocky Creek, Inc. d/b/a Quick Serve Mart** located at 1106 Rocky Creek Rd., Macon, Georgia, knowing that it purports to be an acknowledgement of a lawful oath or affirmation, being a matter other than a judicial proceeding, and knowingly and willfully made a false statement, that he was not delinquent in taxes owed to the State of Georgia as detailed in Count 21 of this indictment, in Bibb County, Georgia.
38. That on or about June 11, 2018, **Defendant HIREN PATEL**, through a pattern of racketeering activity, did commit the offense of False Swearing, in violation of O.C.G.A. Sec. 16-10-71 when he executed a COAM application for License Year 2019 to the Georgia Lottery Commission, for **1106 Rocky Creek, Inc. d/b/a Quick Serve Mart** located at 1106 Rocky Creek Rd., Macon, Georgia, knowing that it purports to be an acknowledgement of a lawful oath or affirmation, being a matter other than a judicial proceeding, and knowingly and willfully made a false statement, that he was not delinquent in taxes owed to the State of Georgia as detailed in Count 22 of this indictment, in Bibb County, Georgia.
39. That on or about May 22, 2019, **Defendant HIREN PATEL**, through a pattern of racketeering activity, did commit the offense of False Swearing, in violation of O.C.G.A. Sec. 16-10-71 when he executed a COAM application for License Year 2020 to the Georgia Lottery Commission, for **1106 Rocky Creek, Inc. d/b/a Quick Serve Mart** located at 1106 Rocky Creek Rd., Macon, Georgia, knowing that it purports to be an acknowledgement of a lawful oath or affirmation, being a matter other than a judicial proceeding, and knowingly and willfully made a false statement, that he was not delinquent in taxes owed to the State of Georgia as detailed in Count 23 of this indictment, in Bibb County, Georgia.
40. That on or about May 22, 2019, **DEFENDANT PANTH PATEL**, through a pattern of racketeering activity, did commit the offense of False Swearing, in violation of O.C.G.A. Sec. 16-10-71 when he executed a COAM application for License Year 2020 to the Georgia Lottery Commission, for **SMP Patel, Inc. d/b/a Sunrise Stores** located at 3750 Mercer University Dr., Macon, Georgia, knowing that it purports to be an acknowledgement of a lawful oath or affirmation, being a matter other than a judicial proceeding, and knowingly and

- willfully made a false statement, that he was not delinquent in taxes owed to the State of Georgia as detailed in Count 24 of this indictment, in Bibb County, Georgia.
41. That on or about May 16, 2018, **DEFENDANT RAHIM MCCARLEY**, through a pattern of racketeering activity, did commit the offense of False Swearing, in violation of O.C.G.A. Sec. 16-10-71 when he executed a COAM application for License Year 2019 to the Georgia Lottery Commission, for **Macon Secured, LLC d/b/a RJS Food Mart** located at 2311 Pio Nono Ave., Macon, Georgia, knowing that it purports to be an acknowledgement of a lawful oath or affirmation, being a matter other than a judicial proceeding, and knowingly and willfully made a false statement, that he was not delinquent in taxes owed to the State of Georgia as detailed in Count 25 of this indictment, in Bibb County, Georgia
42. That on or about May 17, 2019, **DEFENDANT RAHIM MCCARLEY**, through a pattern of racketeering activity, did commit the offense of False Swearing, in violation of O.C.G.A. Sec. 16-10-71 when he executed a COAM application for License Year 2020 to the Georgia Lottery Commission, for **Macon Secured, LLC d/b/a RJS Food Mart** located at 2311 Pio Nono Ave., Macon, Georgia, knowing that it purports to be an acknowledgement of a lawful oath or affirmation, being a matter other than a judicial proceeding, and knowingly and willfully made a false statement, that he was not delinquent in taxes owed to the State of Georgia as detailed in Count 26 of this indictment, in Bibb County, Georgia.
43. That on or about June 1, 2019, **DEFENDANT ENNIS ODOM**, through a pattern of racketeering activity, did commit the offense of False Swearing, in violation of O.C.G.A. Sec. 16-10-71 when he executed a COAM application for License Year 2020 to the Georgia Lottery Commission, for **Hartley Bridge Citgo, Inc.**, located at 4535 Hartley Bridge Rd., Macon, Georgia, knowing that it purports to be an acknowledgement of a lawful oath or affirmation, being a matter other than a judicial proceeding, and knowingly and willfully made a false statement, that he was not delinquent in taxes owed to the State of Georgia as detailed in Count 27 of this indictment, in Bibb County, Georgia.
44. That on or about June 27, 2017, **Defendant MUKESHKUMAR PATEL**, through a pattern of racketeering activity, did commit the offense of False Swearing, in violation of O.C.G.A. Sec. 16-10-71 when he executed a COAM application for License Year 2018 to the Georgia Lottery Commission, for **Krishna Parth, LLC** located at 2304 Norwich St., Brunswick, Georgia, knowing that it purports to be an acknowledgement of a lawful oath or affirmation, being a matter other than a judicial proceeding, and knowingly and willfully made a false statement, that he was not delinquent in taxes owed to the State of Georgia.

45. That on or about May 6, 2018, **Defendant MUKESHKUMAR PATEL**, through a pattern of racketeering activity, did commit the offense of False Swearing, in violation of O.C.G.A. Sec. 16-10-71 when he executed a COAM application for License Year 2019 to the Georgia Lottery Commission, for **Krishna Parth, LLC** located at 2304 Norwich St., Brunswick, Georgia, knowing that it purports to be an acknowledgement of a lawful oath or affirmation, being a matter other than a judicial proceeding, and knowingly and willfully made a false statement, that he was not delinquent in taxes owed to the State of Georgia.
46. That on or about May 13, 2017, **Defendant MUKESHKUMAR PATEL**, through a pattern of racketeering activity, did commit the offense of False Swearing, in violation of O.C.G.A. Sec. 16-10-71 when he executed a COAM application for License Year 2018 to the Georgia Lottery Commission, for **APMM Corporation** located at 408 W. Ogeechee St., Sylvania, Georgia, knowing that it purports to be an acknowledgement of a lawful oath or affirmation, being a matter other than a judicial proceeding, and knowingly and willfully made a false statement, that he was not delinquent in taxes owed to the State of Georgia.
47. That on or about May 21, 2018, **Defendant MUKESHKUMAR PATEL**, through a pattern of racketeering activity, did commit the offense of False Swearing, in violation of O.C.G.A. Sec. 16-10-71 when he executed a COAM application for License Year 2019 to the Georgia Lottery Commission, for **APMM Corporation** located at 408 W. Ogeechee St., Sylvania, Georgia, knowing that it purports to be an acknowledgement of a lawful oath or affirmation, being a matter other than a judicial proceeding, and knowingly and willfully made a false statement, that he was not delinquent in taxes owed to the State of Georgia.
48. That on or about May 1, 2017, **Defendants SAMIR PATEL AND NITAL "NICK" RAVAL**, through a pattern of racketeering activity, did commit the offense of False Swearing, in violation of O.C.G.A. Sec. 16-10-71 when **SAMIR PATEL** executed a COAM application for License Year 2018 to the Georgia Lottery Commission, for **S & W Amusements, Inc.**, knowing that it purports to be an acknowledgement of a lawful oath or affirmation, being a matter other than a judicial proceeding, and knowingly and willfully made a false statement that they were in compliance with the requirements of O.C.G.A. Sec. 50-27-87.1 prohibiting unfair methods of competition and unfair and deceptive acts, that they were not paying inducements to location store owners or operators, as detailed in Count 14 of this indictment, in Bibb County, Georgia.
49. That on or about May 1, 2018, **Defendants SAMIR PATEL AND NITAL "NICK" RAVAL**, through a pattern of racketeering activity, did commit the offense of False Swearing, in violation of O.C.G.A.

- Sec. 16-10-71 when **SAMIR PATEL** executed a COAM application for License Year 2019 to the Georgia Lottery Commission, for **S & W Amusements, Inc.**, knowing that it purports to be an acknowledgement of a lawful oath or affirmation, being a matter other than a judicial proceeding, and knowingly and willfully made false statements, that they were not delinquent in taxes owed to the State of Georgia and that they were in compliance with the requirements of O.C.G.A. Sec. 50-27-87.1, which prohibits unfair methods of competition and unfair and deceptive acts, which prohibits the payment of inducements to location store owners or operators, as detailed in Count 15 of this indictment, in Bibb County, Georgia.
50. That on or about May 2, 2017, **Defendants BHUNICA AMBU AND MANOJ "RAY" PATEL**, through a pattern of racketeering activity, did commit the offense of False Swearing, in violation of O.C.G.A. Sec. 16-10-71 when **BHUNICA AMBU** executed a COAM application for License Year 2018 to the Georgia Lottery Commission, for **Booray Group, LLC**, knowing that it purports to be an acknowledgement of a lawful oath or affirmation, being a matter other than a judicial proceeding, and knowingly and willfully made a false statement, that they were in compliance with the requirements of O.C.G.A. Sec. 50-27-87.1, which prohibits unfair methods of competition and unfair and deceptive acts, which prohibits the payment of inducements to location store owners or operators.
51. That on or about May 2, 2018, **Defendants BHUNICA AMBU AND MANOJ "RAY" PATEL**, through a pattern of racketeering activity, did commit the offense of False Swearing, in violation of O.C.G.A. Sec. 16-10-71 when **BHUNICA AMBU** executed a COAM application for License Year 2019 to the Georgia Lottery Commission, for **Booray Group, LLC**, knowing that it purports to be an acknowledgement of a lawful oath or affirmation, being a matter other than a judicial proceeding, and knowingly and willfully made false statements, that they were not delinquent in taxes owed to the State of Georgia and that they were in compliance with the requirements of O.C.G.A. Sec. 50-27-87.1, which prohibits unfair methods of competition and unfair and deceptive acts, which prohibits the payment of inducements to location store owners or operators.
52. That on or about July 5, 2017, **DEFENDANT MANOJ "RAY" PATEL**, through a pattern of racketeering activity, did commit the offense of False Swearing, in violation of O.C.G.A. Sec. 16-10-71 when he executed a COAM application for License Year 2018 to the Georgia Lottery Commission, for **Krishna Amusement, Inc.**, knowing that it purports to be an acknowledgement of a lawful oath or affirmation, being a matter other than a judicial proceeding, and knowingly and willfully made a false statement, that he was in compliance with the requirements of O.C.G.A. Sec. 50-27-87.1, which prohibits unfair methods of competition and unfair and

- deceptive acts, which prohibits the payment of inducements to location store owners or operators.
53. That on or about May 2, 2018, **DEFENDANT MANOJ "RAY" PATEL**, through a pattern of racketeering activity, did commit the offense of False Swearing, in violation of O.C.G.A. Sec. 16-10-71 when he executed a COAM application for License Year 2019 to the Georgia Lottery Commission, for **Krishna Amusement, Inc.**, knowing that it purports to be an acknowledgement of a lawful oath or affirmation, being a matter other than a judicial proceeding, and knowingly and willfully made false statements, that he was not delinquent in taxes owed to the State of Georgia and that he was in compliance with the requirements of O.C.G.A. Sec. 50-27-87.1, which prohibits unfair methods of competition and unfair and deceptive acts, which prohibits the payment of inducements to location store owners or operators.
54. That on or about May 2, 2017, **Defendants ZANKHANA PATEL AND MANOJ "RAY" PATEL**, through a pattern of racketeering activity, did commit the offense of False Swearing, in violation of O.C.G.A. Sec. 16-10-71 when **ZANKHANA PATEL** executed a COAM application for License Year 2018 to the Georgia Lottery Commission, for **PNP Amusement Games, LLC**, knowing that it purports to be an acknowledgement of a lawful oath or affirmation, being a matter other than a judicial proceeding, and knowingly and willfully made a false statement, that they were in compliance with the requirements of O.C.G.A. Sec. 50-27-87.1, which prohibits unfair methods of competition and unfair and deceptive acts, which prohibits the payment of inducements to location store owners or operators.
55. That on or about May 2, 2018, **Defendants ZANKHANA PATEL AND MANOJ "RAY" PATEL**, through a pattern of racketeering activity, did commit the offense of False Swearing, in violation of O.C.G.A. Sec. 16-10-71 when **ZANKHANA PATEL** executed a COAM application for License Year 2019 to the Georgia Lottery Commission, for **PNP Amusement Games, LLC**, knowing that it purports to be an acknowledgement of a lawful oath or affirmation, being a matter other than a judicial proceeding, and knowingly and willfully made false statements, that they were not delinquent in taxes owed to the State of Georgia and that they were in compliance with the requirements of O.C.G.A. Sec. 50-27-87.1, which prohibits unfair methods of competition and unfair and deceptive acts, which prohibits the payment of inducements to location store owners or operators.
56. That on or about January 8, 2019, **Defendant SAMIR PATEL**, through a pattern of racketeering activity, did commit the offense of False Swearing, in violation of O.C.G.A. Sec. 16-10-71, after having been administered a lawful oath or affirmation in an administrative hearing for the Georgia Lottery Commission before the Honorable Robert Wilson, did knowingly and willfully make false statements:

- that he was the 100% owner of **S & W Amusements, Inc.** from 2014-2019; and, that **NITAL “NICK” RAVAL** had no equity interest in **S & W Amusements, Inc.**
57. That on or about January 9, 2019, **Defendant NITAL “NICK” RAVAL**, through a pattern of racketeering activity, did commit the offense of False Swearing, in violation of O.C.G.A. Sec. 16-10-71, after having been administered a lawful oath or affirmation in an administrative hearing for the Georgia Lottery Commission before the Honorable Robert Wilson, did knowingly and willfully make false statements: that the “K-1” tax documents attached to the (original) corporate tax returns of **S & W Amusements, Inc.** were not accurate showing him to be a shareholder; that he did not know the “K-1s” said he was a shareholder; and, that the “W-2s” on the amended corporate tax returns of **S & W Amusements, Inc.** were accurate.
58. That on or about January 9, 2019, **Defendant NITAL “NICK”RAVAL**, through a pattern of racketeering activity, did commit the offense of False Swearing, in violation of O.C.G.A. Sec. 16-10-71, after having been administered a lawful oath or affirmation in an administrative hearing for the Georgia Lottery Commission before the Honorable Robert Wilson, did knowingly and willfully make a false statement, that **S & W Amusements, Inc.** bought the **Krishna Amusements, Inc.** COAMS when **S & W Amusements, Inc.** took over the **Empire Quick Stop** store location when **Krishna Amusements, Inc.** lost its master license.

**FALSE STATEMENTS AND WRITINGS, CONCEALMENT OF FACTS, AND  
FRAUDULENT DOCUMENTS IN MATTERS WITHIN THE JURISDICTION OF  
STATE OR POLITICAL SUBDIVISIONS  
AS DEFINED IN O.C.G.A.SEC. 16-10-20  
RICO UNDER O.C.G.A.SEC. 16-14-3 (5)(A)(xxii)**

59. That on or about February 25, 2017, **Defendants PARTH PATEL AND MANOJ “RAY” PATEL**, through a pattern of racketeering activity did commit the offense of False Statements and Writings, Concealment of Facts, and Fraudulent Documents in Matters within the Jurisdiction of State or Political Subdivisions, in violation of O.C.G.A. Sec. 16-10-20, did knowingly and willfully make a false document, a Form 1120S U.S. Income Tax Return for an S Corporation for calendar year 2016 for **Anjaneya Investment, Inc.**, and did attach the same to his State of Georgia tax return for **Anjaneya Investments, Inc.**, knowing it to contain false, fictitious or fraudulent statements or entries, that said **Anjaneya Investments, Inc.** had total deductions in the amount of \$2,042,094, in a matter within the jurisdiction of the Department of Revenue, an agency of the State of Georgia.

60. That on or about February 15, 2018, **Defendants PARTH PATEL AND MANOJ "RAY" PATEL**, through a pattern of racketeering activity did commit the offense of False Statements and Writings, Concealment of Facts, and Fraudulent Documents in Matters within the Jurisdiction of State or Political Subdivisions, in violation of O.C.G.A. Sec. 16-10-20, did knowingly and willfully make a false document, a Form 1120S U.S. Income Tax Return for an S Corporation for calendar year 2017 and dated 2/15/17 for **Anjaneya Investment, Inc.**, and did attach the same to his State of Georgia tax return for **Anjaneya Investments, Inc.**, knowing it to contain false, fictitious or fraudulent statements or entries, that said **Anjaneya Investments, Inc.** had total deductions in the amount of \$1,047,097, in a matter within the jurisdiction of the Department of Revenue, an agency of the State of Georgia.
61. That on or about February 18, 2018, **Defendants BHUNICA AMBU AND MANOJ "RAY" PATEL**, through a pattern of racketeering activity did commit the offense of False Statements and Writings, Concealment of Facts, and Fraudulent Documents in Matters within the Jurisdiction of State or Political Subdivisions, in violation of O.C.G.A. Sec. 16-10-20, did knowingly and willfully make a false document, a Form 1120S U.S. Income Tax Return for an S Corporation for calendar year 2017 for **Booray Group, LLC**, and did attach the same to the State of Georgia tax return for **Booray Group, LLC**, knowing it to contain false, fictitious or fraudulent statements or entries, that said **Booray Group, LLC** had total deductions in the amount of \$656,150, and that **BHUNICA AMBU** is the 100% shareholder, in a matter within the jurisdiction of the Department of Revenue, an agency of the State of Georgia.
62. That on or about March 6, 2019, **Defendants BHUNICA AMBU AND MANOJ "RAY" PATEL**, through a pattern of racketeering activity did commit the offense of False Statements and Writings, Concealment of Facts, and Fraudulent Documents in Matters within the Jurisdiction of State or Political Subdivisions, in violation of O.C.G.A. Sec. 16-10-20, did knowingly and willfully make a false document, a Form 1120S U.S. Income Tax Return for an S Corporation for calendar year 2018 for **Booray Group, LLC**, and did attach the same to the State of Georgia tax return for **Booray Group, LLC**, knowing it to contain false, fictitious or fraudulent statements or entries, that said **Booray Group, LLC** had total deductions in the amount of \$987,026, and that **BHUNICA AMBU** is the 100% shareholder, in a matter within the jurisdiction of the Department of Revenue, an agency of the State of Georgia.
63. That on or about February 19, 2018, **Defendant MANOJ "RAY" PATEL**, through a pattern of racketeering activity did commit the offense of False Statements and Writings, Concealment of Facts, and Fraudulent Documents in Matters within the Jurisdiction of State or

- Political Subdivisions, in violation of O.C.G.A. Sec. 16-10-20, did knowingly and willfully make a false document, a Form 1120S U.S. Income Tax Return for an S Corporation for calendar year 2017 for **Krishna Amusement, Inc.**, and did attach the same to his State of Georgia tax return for **Krishna Amusement, Inc.**, knowing it to contain false, fictitious or fraudulent statements or entries, that said **Krishna Amusement, Inc.** had total deductions in the amount of \$792,785, in a matter within the jurisdiction of the Department of Revenue, an agency of the State of Georgia.
64. That on or about January 22, 2019, **Defendant MANOJ "RAY" PATEL**, through a pattern of racketeering activity did commit the offense of False Statements and Writings, Concealment of Facts, and Fraudulent Documents in Matters within the Jurisdiction of State or Political Subdivisions, in violation of O.C.G.A. Sec. 16-10-20, did knowingly and willfully make a false document, a Form 1120S U.S. Income Tax Return for an S Corporation for calendar year 2018 for **Krishna Amusement, Inc.**, and did attach the same to his State of Georgia tax return for **Krishna Amusement, Inc.**, knowing it to contain false, fictitious or fraudulent statements or entries, that said **Krishna Amusement, Inc.** had total deductions in the amount of \$418,915, in a matter within the jurisdiction of the Department of Revenue, an agency of the State of Georgia.
65. That on or about February 19, 2018, **Defendants ZANKHANA PATEL AND MANOJ "RAY" PATEL**, through a pattern of racketeering activity did commit the offense of False Statements and Writings, Concealment of Facts, and Fraudulent Documents in Matters within the Jurisdiction of State or Political Subdivisions, in violation of O.C.G.A. Sec. 16-10-20, did knowingly and willfully make a false document, a Form 1120S U.S. Income Tax Return for an S Corporation for calendar year 2017 for **PNP Amusement Games, Inc.** and did attach the same to the State of Georgia tax return for **PNP Amusement Games, Inc.**, knowing it to contain false, fictitious or fraudulent statements or entries, that said **PNP Amusement Games, Inc.** had total deductions in the amount of \$1,722,851, and that **ZANKHANA PATEL** is the 100% shareholder, in a matter within the jurisdiction of the Department of Revenue, an agency of the State of Georgia.
66. That on or about March 4, 2019, **Defendants ZANKHANA PATEL AND MANOJ "RAY" PATEL**, through a pattern of racketeering activity did commit the offense of False Statements and Writings, Concealment of Facts, and Fraudulent Documents in Matters within the Jurisdiction of State or Political Subdivisions, in violation of O.C.G.A. Sec. 16-10-20, did knowingly and willfully make a false document, a Form 1120S U.S. Income Tax Return for an S Corporation for calendar year 2018 for **PNP Amusement Games, Inc.** and did attach the same to the State of Georgia tax return for

- PNP Amusement Games, Inc.**, knowing it to contain false, fictitious or fraudulent statements or entries, that said **PNP Amusement Games, Inc.** had total deductions in the amount of \$1,330,153, and that **ZANKHANA PATEL** is the 100% shareholder, in a matter within the jurisdiction of the Department of Revenue, an agency of the State of Georgia.
67. That on or about March 8, 2018, **Defendants SAMIR PATEL AND NITAL "NICK" RAVAL**, through a pattern of racketeering activity did commit the offense of False Statements and Writings, Concealment of Facts, and Fraudulent Documents in Matters within the Jurisdiction of State or Political Subdivisions, in violation of O.C.G.A. Sec. 16-10-20, did knowingly and willfully make a false document, a Form 1120S U.S. Income Tax Return for an S Corporation for calendar year 2017 for **S & W Amusements, Inc.** and did attach the same to the State of Georgia tax return for **S & W Amusements, Inc.**, knowing it to contain false, fictitious or fraudulent statements or entries, that said **S & W Amusements, Inc.** had total deductions in the amount of \$5,539,301, in a matter within the jurisdiction of the Department of Revenue, an agency of the State of Georgia.
68. That on or about April 30, 2018, **Defendant NITAL "NICK" RAVAL**, through a pattern of racketeering activity did commit the offense of False Statements and Writings, Concealment of Facts, and Fraudulent Documents in Matters within the Jurisdiction of State or Political Subdivisions, in violation of O.C.G.A. Sec. 16-10-20, did knowingly and willfully make a false document, a GLC Dispute Certification Form for **S & W Amusements, Inc.** as Master Licensee and **Empire Quick Stop** as Location Licensee, knowing the same to contain a false statement, that there was NO DISPUTE between the master licensee and the location licensee, in a matter within the jurisdiction of the Georgia Lottery Commission, an agency of the State of Georgia.
69. That on or about January 8, 2019, **Defendants SAMIR PATEL AND NITAL "NICK" RAVAL**, through a pattern of racketeering activity did commit the offense of False Statements and Writings, Concealment of Facts, and Fraudulent Documents in Matters within the Jurisdiction of State or Political Subdivisions, in violation of O.C.G.A. Sec. 16-10-20, did knowingly and willfully make a false document, a W-2 for Nitalkumar Raval for calendar year 2017, for **S & W Amusements, Inc.**, knowing it to contain false, fictitious or fraudulent statements or entries, that social security and Medicare taxes were withheld, in a matter within the jurisdiction of the Georgia Lottery Commission, an agency of the State of Georgia.
70. That on or about January 8, 2019, **Defendants SAMIR PATEL AND NITAL "NICK" RAVAL**, through a pattern of racketeering activity did commit the offense of False Statements and Writings,

- Concealment of Facts, and Fraudulent Documents in Matters within the Jurisdiction of State or Political Subdivisions, in violation of O.C.G.A. Sec. 16-10-20, did knowingly and willfully make a false document, a W-2 for Nitalkumar Raval for calendar year 2016, for **S & W Amusements, Inc.**, knowing it to contain false, fictitious or fraudulent statements or entries, that social security and Medicare taxes were withheld, in a matter within the jurisdiction of the Georgia Lottery Commission, an agency of the State of Georgia.
71. That on or about January 8, 2019, **Defendants SAMIR PATEL AND NITAL "NICK" RAVAL**, through a pattern of racketeering activity did commit the offense of False Statements and Writings, Concealment of Facts, and Fraudulent Documents in Matters within the Jurisdiction of State or Political Subdivisions, in violation of O.C.G.A. Sec. 16-10-20, did knowingly and willfully make a false document, a W-2 for Nitalkumar Raval for calendar year 2015, for **S & W Amusements, Inc.**, knowing it to contain false, fictitious or fraudulent statements or entries, that social security and Medicare taxes were withheld, in a matter within the jurisdiction of the Georgia Lottery Commission, an agency of the State of Georgia.

#### **BRIBERY**

AS DEFINED IN O.C.G.A. SEC. 16-10-2  
RICO UNDER O.C.G.A. SEC. 16-14-3(5)(A)(xxi)

72. That between April 24, 2017 and December 31, 2017, **Defendants NITAL "NICK" RAVAL and LARRY TODD MASHBURN**, through a pattern of racketeering activity did commit the offense of Bribery, in violation of O.C.G.A. Sec. 16-10-2, when **NITAL "NICK" RAVAL** did give **LARRY TODD MASHBURN**, a person acting on behalf of the Bulloch County Sheriff's Department, an agency of a political subdivision of the State of Georgia, a benefit to which said **LARRY TODD MASHBURN** was not entitled with the purpose of influencing said **LARRY TODD MASHBURN** in the performance of acts related to the functions of said **LARRY TODD MASHBURN'S** employment as a captain with the Bulloch County Sheriff's Department when **NITAL "NICK" RAVAL** provided **LARRY TODD MASHBURN** with a watch, loans and gifts of money, and the use of vehicle(s) by inducing the reasonable belief that the giving of those things would influence the performance of any official action including said **LARRY TODD MASHBURN** providing **NITAL "NICK" RAVAL** with a Bulloch County Sheriff's identification card and badge, assistance with traffic citations and assistance with law enforcement protection.
73. That on or about September 13, 2017, **Defendants NITAL "NICK" RAVAL AND RONALD C. HUCKABY**, through a pattern of racketeering activity did commit the offense of Bribery, in

violation of O.C.G.A. Sec. 16-10-2, when **NITAL "NICK" RAVAL** did give **RONALD C. HUCKABY**, a person acting on behalf of the Department of Revenue, an agency of the State of Georgia, a benefit to which said **RONALD C. HUCKABY** was not entitled with the purpose of influencing said **RONALD C. HUCKABY** in the performance of acts related to the functions of said **RONALD C. HUCKABY'S** employment as a revenue agent with the Department of Revenue, an agency of the State of Georgia when **NITAL "NICK" RAVAL** provided **RONALD C. HUCKABY** with American Airlines tickets for he and his wife to fly on September 13, 2017 from Savannah, GA to Portland in the amount of \$485.60 per ticket, by inducing the reasonable belief that the giving of those things would influence the performance of any official action including said **RONALD C. HUCKABY** providing **NITAL "NICK" RAVAL** with confidential Department of Revenue information concerning other businesses with which **NITAL "NICK" RAVAL'S** business was in competition.

74. That on or about April 28, 2018, **Defendants NITAL "NICK" RAVAL AND RONALD C. HUCKABY**, through a pattern of racketeering activity did commit the offense of Bribery, in violation of O.C.G.A. Sec. 16-10-2, when **NITAL "NICK" RAVAL** did give **RONALD C. HUCKABY**, a person acting on behalf of the Department of Revenue, an agency of the State of Georgia, a benefit to which said **RONALD C. HUCKABY** was not entitled with the purpose of influencing said **RONALD C. HUCKABY** in the performance of acts related to the functions of said **RONALD C. HUCKABY'S** employment as a revenue agent with the Department of Revenue, an agency of the State of Georgia when **NITAL "NICK" RAVAL** provided **RONALD C. HUCKABY** with American Airlines tickets for he and his wife to fly on April 28, 2018 from Savannah, GA to Los Angeles, CA in the amount of \$305.20 per ticket by inducing the reasonable belief that the giving of those things would influence the performance of any official action including said **RONALD C. HUCKABY** providing **NITAL "NICK" RAVAL** with confidential Department of Revenue information concerning other businesses with which **NITAL "NICK" RAVAL'S** business was in competition.

IN RECOGNITION OF THE FOREGOING

20 CR 78347

The Grand Jurors aforesaid, in the name and behalf of the citizens of Georgia, charge and accuse : **NITAL "NICK" RAVAL, MANOJ "RAY" PATEL, PARTH PATEL, BHUNICA AMBU, SAMIR PATEL, ZANKHANA PATEL, MUKESHKUMAR PATEL, RAHIM MCCARLEY, KUNJ PATEL, MANISHKUMAR PATEL, HIREN PATEL, PANTH PATEL, ENNIS ODOM, NIMISHABEN CHAUDHARI, RONALD C. HUCKABY and LARRY TODD MASHBURN** with the offense of **VIOLATION OF THE RACKETEER AND CORRUPT ORGANIZATIONS ACT, O.C.G.A. SEC. 16-14-4 (a)** for that the said accused in the County of Bibb and the State of Georgia, between January 1, 2016 and July 2, 2019, did, through a pattern of racketeering activity described above, unlawfully acquire and maintain, directly and indirectly, an interest in and control of **The Enterprise**, real property and personal property of any nature, including money, contrary to the laws of said State, the good order, peace and dignity thereof.

COUNT 2

The Grand Jurors aforesaid, in the name and behalf of the citizens of Georgia, charge and accuse **NITAL "NICK" RAVAL, MANOJ "RAY" PATEL, PARTH PATEL, BHUNICA AMBU, SAMIR PATEL, ZANKHANA PATEL, MUKESHKUMAR PATEL, RAHIM MCCARLEY, KUNJ PATEL, MANISHKUMAR PATEL, HIREN PATEL, PANTH PATEL, ENNIS ODOM, NIMISHABEN CHAUDHARI, RONALD C. HUCKABY and LARRY TODD MASHBURN** with the offense of **VIOLATION OF THE RACKETEER AND CORRUPT ORGANIZATIONS ACT, O.C.G.A. SEC. 16-14-4 (b)** for that the said accused in the County of Bibb and the State of Georgia, between January 1, 2016 and July 2, 2019 did, while associated with **The Enterprise** described above, in Count 1 of this indictment and incorporated herein by reference, conduct and participate in, directly and indirectly, such enterprise through a pattern of racketeering activity as set forth and described in Count 1 of this indictment and incorporated by reference herein, contrary to the laws of said State, the good order, peace and dignity thereof.

COUNT 3

The Grand Jurors aforesaid, in the name and behalf of the citizens of Georgia, charge and accuse **RAHIM MCCARLEY, NITAL "NICK" RAVAL AND SAMIR PATEL** with the offense of **GAMBLING, O.C.G.A. SEC. 16-12-35 (g)**, for that the said accused, in the County of Bibb and the State of Georgia, on or about the 10<sup>th</sup> day of April, 2019, by owning or possessing a bona fide coin operated amusement game at **Macon Secured, LLC d/b/a RJS Food Mart** located at 2311 Pio Nono Avenue, Macon, did pay or allow a person acting on their behalf to pay, \$15 cash money to Georgia Department of Revenue Employee M. Price, who was acting as a customer, as a reward for the successful play of such amusement game, contrary to the laws of said State, the good order, peace and dignity thereof.

## COUNT 4

The Grand Jurors aforesaid, in the name and behalf of the citizens of Georgia, charge and accuse **RAHIM MCCARLEY, NITAL "NICK" RAVAL AND SAMIR PATEL** with the offense of **GAMBLING, O.C.G.A. SEC. 16-12-35(g)**, for that the said accused, in the County of Bibb and the State of Georgia, on or about the 11<sup>th</sup> day of April, 2019, by owning or possessing a bona fide coin operated amusement game at **Macon Secured, LLC d/b/a RJS Food Mart** located at 2311 Pio Nono Avenue, Macon, did pay or allow a person acting on their behalf to pay, \$40 to Georgia Department of Revenue Employee D. Brookins and \$60 cash money to Georgia Department of Revenue Employee M. Price, both of whom were acting as a customer, as a reward for the successful play of such amusement game, contrary to the laws of said State, the good order, peace and dignity thereof.

## COUNT 5

The Grand Jurors aforesaid, in the name and behalf of the citizens of Georgia, charge and accuse **RAHIM MCCARLEY, NITAL "NICK" RAVAL AND SAMIR PATEL** with the offense of **GAMBLING, O.C.G.A. SEC. 16-12-35(g)**, for that the said accused, in the County of Bibb and the State of Georgia, on or about the 20<sup>th</sup> day of June, 2019, by owning or possessing a bona fide coin operated amusement game at **Macon Secured, LLC d/b/a RJS Food Mart** located at 2311 Pio Nono Avenue, Macon, did pay or allow a person acting on their behalf to pay, \$40 cash money to Georgia Department of Revenue Employee V. Arrington, who was acting as a customer, as a reward for the successful play of such amusement game, contrary to the laws of said State, the good order, peace and dignity thereof.

## COUNT 6

The Grand Jurors aforesaid, in the name and behalf of the citizens of Georgia, charge and accuse **RAHIM MCCARLEY, NITAL "NICK" RAVAL AND SAMIR PATEL** with the offense of **GAMBLING, O.C.G.A. SEC. 16-12-35(g)**, for that the said accused, in the County of Bibb and the State of Georgia, on or about the 2nd day of July, 2019, by owning or possessing a bona fide coin operated amusement game at **Macon Secured, LLC d/b/a RJS Food Mart** located at 2311 Pio Nono Avenue, Macon, did pay or allow a person acting on their behalf to pay, \$35 cash money to Georgia Department of Revenue Employee V. Arrington, who was acting as a customer, as a reward for the successful play of such amusement game, contrary to the laws of said State, the good order, peace and dignity thereof.

COUNT 7

20 CR 78347

The Grand Jurors aforesaid, in the name and behalf of the citizens of Georgia, charge and accuse **KUNJ PATEL, NITAL "NICK" RAVAL AND SAMIR PATEL** with the offense of **GAMBLING, O.C.G.A. SEC. 16-12-35(g)**, for that the said accused, in the County of Bibb and the State of Georgia, on or about the 11th day of April, 2019, by owning or possessing a bona fide coin operated amusement game at **BMF East, LLC d/b/a Exxon Food Mart** located at 3170 Millerfield Road, Macon, did pay or allow a person acting on their behalf to pay, \$80 cash money to Georgia Department of Revenue Employee D. Brookins, who was acting as a customer, as a reward for the successful play of such amusement game, contrary to the laws of said State, the good order, peace and dignity thereof.

COUNT 8

The Grand Jurors aforesaid, in the name and behalf of the citizens of Georgia, charge and accuse **MANISHKUMAR PATEL, NITAL "NICK" RAVAL AND SAMIR PATEL** with the offense of **GAMBLING, O.C.G.A. SEC. 16-12-35(g)**, for that the said accused, in the County of Bibb and the State of Georgia, on or about the 20th day of June, 2019, by owning or possessing a bona fide coin operated amusement game at **Atita d/b/a Exxon** located at 4290 Dellwood Avenue, Macon, did pay or allow a person acting on their behalf to pay, \$20 cash money to Georgia Department of Revenue Employee V. Arrington, who was acting as a customer, as a reward for the successful play of such amusement game, contrary to the laws of said State, the good order, peace and dignity thereof.

COUNT 9

The Grand Jurors aforesaid, in the name and behalf of the citizens of Georgia, charge and accuse **MANISHKUMAR PATEL, NITAL "NICK" RAVAL AND SAMIR PATEL** with the offense of **GAMBLING, O.C.G.A. SEC. 16-12-35(g)**, for that the said accused, in the County of Bibb and the State of Georgia, on or about the 2nd day of July, 2019, by owning or possessing a bona fide coin operated amusement game at **Atita d/b/a Exxon** located at 4290 Dellwood Avenue, Macon, did pay or allow a person acting on their behalf to pay, \$20 to Georgia Department of Revenue Employee V. Arrington and \$40 cash money to Georgia Department of Revenue Employee D. Brookins, both of whom were acting as a customer, as a reward for the successful play of such amusement game, contrary to the laws of said State, the good order, peace and dignity thereof.

COUNT 10

20 CR 78347

The Grand Jurors aforesaid, in the name and behalf of the citizens of Georgia, charge and accuse **HIREN PATEL, NITAL "NICK" RAVAL AND SAMIR PATEL** with the offense of **GAMBLING, O.C.G.A. SEC. 16-12-35(g)**, for that the said accused, in the County of Bibb and the State of Georgia, on or about the 10th day of April, 2019, by owning or possessing a bona fide coin operated amusement game at **1106 Rocky Creek, Inc. d/b/a Quick Serve Food Mart** located at 1106 Rocky Creek Road, Macon, did pay or allow a person acting on their behalf to pay, \$20 to Georgia Department of Revenue Employee V. Arrington and \$15 cash money to Georgia Department of Revenue Employee D. Brookins, both of whom were acting as a customer, as a reward for the successful play of such amusement game, contrary to the laws of said State, the good order, peace and dignity thereof.

COUNT 11

The Grand Jurors aforesaid, in the name and behalf of the citizens of Georgia, charge and accuse **HIREN PATEL, NITAL "NICK" RAVAL AND SAMIR PATEL** with the offense of **GAMBLING, O.C.G.A. SEC. 16-12-35(g)**, for that the said accused, in the County of Bibb and the State of Georgia, on or about the 11th day of April, 2019, by owning or possessing a bona fide coin operated amusement game at **1106 Rocky Creek, Inc. d/b/a Quick Serve Food Mart** located at 1106 Rocky Creek Road, Macon, did pay or allow a person acting on their behalf to pay, \$20 to Georgia Department of Revenue Employee V. Arrington and \$20 cash money to Georgia Department of Revenue Employee M. Price, both of whom were acting as a customer, as a reward for the successful play of such amusement game, contrary to the laws of said State, the good order, peace and dignity thereof.

COUNT 12

The Grand Jurors aforesaid, in the name and behalf of the citizens of Georgia, charge and accuse **HIREN PATEL, NITAL "NICK" RAVAL AND SAMIR PATEL** with the offense of **GAMBLING, O.C.G.A. SEC. 16-12-35(g)**, for that the said accused, in the County of Bibb and the State of Georgia, on or about the 20th day of June, 2019, by owning or possessing a bona fide coin operated amusement game at **1106 Rocky Creek, Inc. d/b/a Quick Serve Food Mart** located at 1106 Rocky Creek Road, Macon, did pay or allow a person acting on their behalf to pay, \$20 cash money to Georgia Department of Revenue Employee V. Arrington, who was acting as a customer, as a reward for the successful play of such amusement game, contrary to the laws of said State, the good order, peace and dignity thereof.

### COUNT 13

20 CR 78347

The Grand Jurors aforesaid, in the name and behalf of the citizens of Georgia, charge and accuse **HIREN PATEL, NITAL "NICK" RAVAL AND SAMIR PATEL** with the offense of **GAMBLING, O.C.G.A. SEC. 16-12-35(g)**, for that the said accused, in the County of Bibb and the State of Georgia, on or about the 2nd day of July, 2019, by owning or possessing a bona fide coin operated amusement game at **1106 Rocky Creek, Inc. d/b/a Quick Serve Food Mart** located at 1106 Rocky Creek Road, Macon, did pay or allow a person acting on their behalf to pay, \$40 to Georgia Department of Revenue Employee V. Arrington and \$30 cash money to Georgia Department of Revenue Employee D. Brookins, both of whom were acting as a customer, as a reward for the successful play of such amusement game, contrary to the laws of said State, the good order, peace and dignity thereof.

### COUNT 14

The Grand Jurors aforesaid, in the name and behalf of the citizens of Georgia, charge and accuse **NITAL "NICK" RAVAL AND SAMIR PATEL** with the offense of **FALSE SWEARING, O.C.G.A. SEC. 16-10-71**, for that the said accused in the County of Bibb and State of Georgia, on or about the 1st day of May, 2017, when **SAMIR PATEL** did execute a COAM application for the year 2018 to the Georgia Lottery Commission for **S & W Amusement, Inc.**, knowing that it purports to be an acknowledgement of a lawful oath or affirmation, being a matter other than a judicial proceeding, and knowingly and willfully made a false statement, that they were in compliance with the requirements of O.C.G.A. 50-27-87.1, which prohibits unfair methods of competition and unfair and deceptive acts, which prohibits the payment of inducements to store owners or operators, contrary to the laws of said State, the good order, peace and dignity thereof.

### COUNT 15

The Grand Jurors aforesaid, in the name and behalf of the citizens of Georgia, charge and accuse **NITAL "NICK" RAVAL AND SAMIR PATEL** with the offense of **FALSE SWEARING, O.C.G.A. SEC. 16-10-71**, for that the said accused in the County of Bibb and State of Georgia, on or about the 1<sup>st</sup> day of May, 2018, when **SAMIR PATEL** did execute a COAM application for the year 2019 to the Georgia Lottery Commission for **S & W Amusement, Inc.**, knowing that it purports to be an acknowledgement of a lawful oath or affirmation, being a matter other than a judicial proceeding, and knowingly and willfully made false statements, that they were not delinquent in taxes owed to the State of Georgia, and that they were in compliance with the requirements of O.C.G.A. 50-27-87.1, which prohibits unfair methods of competition and unfair and deceptive acts, which prohibits the payment of inducements to store owners or operators, contrary to the laws of said State, the good order, peace and dignity thereof.

COUNT 16

20 CR 78347

The Grand Jurors aforesaid, in the name and behalf of the citizens of Georgia, charge and accuse **MANISHKUMAR PATEL** with the offense of **FALSE SWEARING, O.C.G.A. SEC. 16-10-71**, for that the said accused in the County of Bibb and State of Georgia, on or about the 22nd day of June, 2018, did execute a COAM application for the year 2019 to the Georgia Lottery Commission for **Atita, LLC** located at 4290 Dellwood Drive, Macon, Georgia knowing that it purports to be an acknowledgement of a lawful oath or affirmation, being a matter other than a judicial proceeding, and knowingly and willfully made false statements, that he was not delinquent in taxes owed to the State of Georgia, contrary to the laws of said State, the good order, peace and dignity thereof.

COUNT 17

The Grand Jurors aforesaid, in the name and behalf of the citizens of Georgia, charge and accuse **MANISHKUMAR PATEL** with the offense of **FALSE SWEARING, O.C.G.A. SEC. 16-10-71**, for that the said accused in the County of Bibb and State of Georgia, on or about the 3rd day of June, 2019, did execute a COAM application for the year 2020 to the Georgia Lottery Commission for **Atita, LLC** located at 4290 Dellwood Drive, Macon, Georgia knowing that it purports to be an acknowledgement of a lawful oath or affirmation, being a matter other than a judicial proceeding, and knowingly and willfully made false statements, that he was not delinquent in taxes owed to the State of Georgia, contrary to the laws of said State, the good order, peace and dignity thereof.

COUNT 18

The Grand Jurors aforesaid, in the name and behalf of the citizens of Georgia, charge and accuse **KUNJ PATEL** with the offense of **FALSE SWEARING, O.C.G.A. SEC. 16-10-71**, for that the said accused in the County of Bibb and State of Georgia, on or about the 2nd day of May, 2017 did execute a COAM application for the year 2018 to the Georgia Lottery Commission for **BMF East, LLC, d/b/a Exxon Food Mart** located at 3170 Millerfield Road, Macon, Georgia knowing that it purports to be an acknowledgement of a lawful oath or affirmation, being a matter other than a judicial proceeding, and knowingly and willfully made false statements, that he was not delinquent in taxes owed to the State of Georgia, contrary to the laws of said State, the good order, peace and dignity thereof.

COUNT 19

20 CR 78347

The Grand Jurors aforesaid, in the name and behalf of the citizens of Georgia, charge and accuse **KUNJ PATEL** with the offense of **FALSE SWEARING, O.C.G.A. SEC. 16-10-71**, for that the said accused in the County of Bibb and State of Georgia, on or about the 8th day of May, 2018 did execute a COAM application for the year 2019 to the Georgia Lottery Commission for **BMF East, LLC, d/b/a Exxon Food Mart** located at 3170 Millerfield Road, Macon, Georgia knowing that it purports to be an acknowledgement of a lawful oath or affirmation, being a matter other than a judicial proceeding, and knowingly and willfully made false statements, that he was not delinquent in taxes owed to the State of Georgia, contrary to the laws of said State, the good order, peace and dignity thereof.

COUNT 20

The Grand Jurors aforesaid, in the name and behalf of the citizens of Georgia, charge and accuse **KUNJ PATEL** with the offense of **FALSE SWEARING, O.C.G.A. SEC. 16-10-71**, for that the said accused in the County of Bibb and State of Georgia, on or about the 9th day of May, 2019 did execute a COAM application for the year 2020 to the Georgia Lottery Commission for **BMF East, LLC, d/b/a Exxon Food Mart** located at 3170 Millerfield Road, Macon, Georgia knowing that it purports to be an acknowledgement of a lawful oath or affirmation, being a matter other than a judicial proceeding, and knowingly and willfully made false statements, that he was not delinquent in taxes owed to the State of Georgia, contrary to the laws of said State, the good order, peace and dignity thereof.

COUNT 21

The Grand Jurors aforesaid, in the name and behalf of the citizens of Georgia, charge and accuse **HIREN PATEL** with the offense of **FALSE SWEARING, O.C.G.A. SEC. 16-10-71**, for that the said accused in the County of Bibb and State of Georgia, on or about the 11th day of May, 2017 did execute a COAM application for the year 2018 to the Georgia Lottery Commission for **1106 Rocky Creek, Inc. d/b/a Quick Serve Food Mart** located at 1106 Rocky Creek Road, Macon, Georgia knowing that it purports to be an acknowledgement of a lawful oath or affirmation, being a matter other than a judicial proceeding, and knowingly and willfully made false statements, that he was not delinquent in taxes owed to the State of Georgia, contrary to the laws of said State, the good order, peace and dignity thereof.

The Grand Jurors aforesaid, in the name and behalf of the citizens of Georgia, charge and accuse **HIREN PATEL** with the offense of **FALSE SWEARING, O.C.G.A. SEC. 16-10-71**, for that the said accused in the County of Bibb and State of Georgia, on or about the 11th day of June, 2018 did execute a COAM application for the year 2019 to the Georgia Lottery Commission for **1106 Rocky Creek, Inc. d/b/a Quick Serve Food Mart** located at 1106 Rocky Creek Road, Macon, Georgia knowing that it purports to be an acknowledgement of a lawful oath or affirmation, being a matter other than a judicial proceeding, and knowingly and willfully made false statements, that he was not delinquent in taxes owed to the State of Georgia, contrary to the laws of said State, the good order, peace and dignity thereof.

## COUNT 23

The Grand Jurors aforesaid, in the name and behalf of the citizens of Georgia, charge and accuse **HIREN PATEL** with the offense of **FALSE SWEARING, O.C.G.A. SEC. 16-10-71**, for that the said accused in the County of Bibb and State of Georgia, on or about the 22nd day of May, 2019 did execute a COAM application for the year 2020 to the Georgia Lottery Commission for **1106 Rocky Creek, Inc. d/b/a Quick Serve Food Mart** located at 1106 Rocky Creek Road, Macon, Georgia knowing that it purports to be an acknowledgement of a lawful oath or affirmation, being a matter other than a judicial proceeding, and knowingly and willfully made false statements, that he was not delinquent in taxes owed to the State of Georgia, contrary to the laws of said State, the good order, peace and dignity thereof.

## COUNT 24

The Grand Jurors aforesaid, in the name and behalf of the citizens of Georgia, charge and accuse **PANTH PATEL** with the offense of **FALSE SWEARING, O.C.G.A. SEC. 16-10-71**, for that the said accused in the County of Bibb and State of Georgia, on or about the 21st day of May, 2019 did execute a COAM application for the year 2020 to the Georgia Lottery Commission for **SMP Patel, Inc. d/b/a Sunrise Stores** located at 3750 Mercer University Dr., Macon, Georgia knowing that it purports to be an acknowledgement of a lawful oath or affirmation, being a matter other than a judicial proceeding, and knowingly and willfully made false statements, that he was not delinquent in taxes owed to the State of Georgia, contrary to the laws of said State, the good order, peace and dignity thereof.

The Grand Jurors aforesaid, in the name and behalf of the citizens of Georgia, charge and accuse **RAHIM MCCARLEY** with the offense of **FALSE SWEARING, O.C.G.A. SEC. 16-10-71**, for that the said accused in the County of Bibb and State of Georgia, on or about the 16th day of May, 2018 did execute a COAM application for the year 2019 to the Georgia Lottery Commission for **Macon Secured, LLC d/b/a RJS Food Mart** located at 2311 Pio Nono Avenue, Macon, Georgia knowing that it purports to be an acknowledgement of a lawful oath or affirmation, being a matter other than a judicial proceeding, and knowingly and willfully made false statements, that he was not delinquent in taxes owed to the State of Georgia, contrary to the laws of said State, the good order, peace and dignity thereof.

## COUNT 26

The Grand Jurors aforesaid, in the name and behalf of the citizens of Georgia, charge and accuse **RAHIM MCCARLEY** with the offense of **FALSE SWEARING, O.C.G.A. SEC. 16-10-71**, for that the said accused in the County of Bibb and State of Georgia, on or about the 17th day of May, 2019 did execute a COAM application for the year 2020 to the Georgia Lottery Commission for **Macon Secured, LLC d/b/a RJS Food Mart** located at 2311 Pio Nono Avenue, Macon, Georgia knowing that it purports to be an acknowledgement of a lawful oath or affirmation, being a matter other than a judicial proceeding, and knowingly and willfully made false statements, that he was not delinquent in taxes owed to the State of Georgia, contrary to the laws of said State, the good order, peace and dignity thereof.

## COUNT 27

The Grand Jurors aforesaid, in the name and behalf of the citizens of Georgia, charge and accuse **ENNIS ODOM** with the offense of **FALSE SWEARING, O.C.G.A. SEC. 16-10-71**, for that the said accused in the County of Bibb and State of Georgia, on or about the 1st day of June, 2019 did execute a COAM application for the year 2020 to the Georgia Lottery Commission for **Hartley Bridge Citgo, Inc.** located at 4535 Hartley Bridge Rd., Macon, Georgia knowing that it purports to be an acknowledgement of a lawful oath or affirmation, being a matter other than a judicial proceeding, and knowingly and willfully made false statements, that he was not delinquent in taxes owed to the State of Georgia, contrary to the laws of said State, the good order, peace and dignity thereof.

BIBB SUPERIOR COURT

K. DAVID COOKE, JR.  
DISTRICT ATTORNEY

DECEMBER 2020

GARY SCHWAB  
PROSECUTOR

**For use with Exhibits A and B**

**20 CR 78347**

S&W, et al  
Bank accounts for Criminal Indictment

Nital Raval / Samir Patel related accounts

S&W Amusements, Inc.	BB&T	52 4110	<b>6898</b>
S&W Amuesments, Inc.	The Heritage Bank	4213	<b>2522</b>
S&W Amuesments, Inc.	Synovus Bank	0609	<b>3171</b>
Ahana Investments, Inc.	The Heritage Bank	4218	<b>5207</b>
Miraya Investments, LLC	The Heritage Bank	4213	<b>2365</b>
Miraya Ahana Irr Trust	The Heritage Bank	4213	<b>2316</b>
N&S Investments, Inc.	The Heritage Bank	4222	<b>0103</b>
Nital J. Raval & Nandini Patel	BB&T	52 4430	<b>3783</b>
Samir & Vashika Patel	Synovus	1128	<b>3561</b>

Manoj "Ray" Patel related accounts

Krishna Amusement, Inc.	Ameris Bank	0021	<b>4692</b>	
Krishna Amusement, Inc.	Ameris Bank	2048 75	<b>1719</b>	
PNP Amusement Games, LLC	Ameris Bank	2048 75	<b>2386</b>	
Booray Group, LLC	Ameris Bank	2048 74	<b>2403</b>	
Booray Group, LLC	Wells Fargo	9757 10	<b>6993</b>	
Myra Parth Irr Trust	Ameris Bank	20 4875	<b>2253</b>	
Myra Parth Irr Trust	Ameris Bank	4001 36	<b>9521</b>	closed 6/14/2018
Anjaneya Investments, Inc.	Ameris Bank	2048 82	<b>0639</b>	
Manoj J. Patel	Ameris Bank	434	<b>2762</b>	savings
Manoj Patel	Ameris Bank	129	<b>7977</b>	with Zankhana
Parth Patel	Ameris Bank	1029 01	<b>8643</b>	personal acct

Exhibit A - 2017

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Legend: the numbers in black indicate a deposit, or funds coming into the named bank account,  
the numbers in red and with parentheses incate funds coming out of the named bank account

Krishna Amusement, Inc.

Ameris Bank acct# ...4692

<u>Date</u>	<u>Ck #</u>	<u>Name/Payee</u>	<u>Explanation</u>	<u>Amount</u>
3/16/2017		Anjaneya Inv. acct ...0639		200,000.00
9/6/2017		Krishna Amusement acct ...1719		(40,000.00)
9/15/2017		PNP Amusement acct ...2386		30,000.00
5/2/2017		Booray Group acct ...2403		(20,000.00)
3/16/2017	1146	Malani Jewelers	Invoice #15206	(38,800.00)
8/10/2017	1149	Nandini Patel (Nital's wife, Manoj's sister)		(10,000.00)
8/15/2017	1147	Lamar Smith Homes	purchase 57 Telford, Savannah	(10,588.00)

Krishna Amusement, Inc.

Ameris Bank acct# ...1719

7/24/2017	1086	Manoj Patel	not deposited into known acct	(10,000.00)
8/9/2017	1094	Manoj Patel	not deposited into known acct	(10,000.00)
1/9/2017		PNP Amusement acct ...2386		15,000.00
3/6/2017		PNP Amusement acct ...2386		40,000.00
10/18/2017		PNP Amusement acct ...2386		50,000.00
12/28/2017		PNP Amusement acct ...2386		70,000.00
6/6/2017		Booray Group acct ...2403		50,000.00
12/14/2017		Booray Group acct ...6993	check payable to Manoj Patel	100,000.00
9/6/2017		Krishna Amusement acct ...4692		40,000.00

<u>Date</u>	<u>Ck #</u>	<u>Name/Payee</u>	<u>Explanation</u>	<u>Amount</u>
<b>PNP Amusement Games, LLC</b>				
<b>Ameris Bank acct# ...2386</b>				
2017		COAM Master sweeps		1,831,873.06
8/17/2017	1332	Anjaneya Inv. acct ...0639		(300,000.00)
9/7/2017	1263	Anjaneya Inv. acct ...0639		(130,000.00)
10/30/2017	1338	Parth Patel	not deposited into known acct	(70,000.00)
1/9/2017		Krishna Amusement acct ...1719		(15,000.00)
3/6/2017		Krishna Amusement acct ...1719		(40,000.00)
10/18/2017		Krishna Amusement acct ...1719		(50,000.00)
12/28/2017		Krishna Amusement acct ...1719		(70,000.00)
9/15/2017		Krishna Amusement acct ...4692		(30,000.00)
7/24/2017		Myra Parth Irr TR acct ...2253		(50,000.00)
11/1/2017		Myra Parth Irr TR acct ...2253		(100,000.00)
11/17/2017		Myra Parth Irr TR acct ...2253		(50,000.00)
7/24/2017		Manoj Patel acct ...2762	savings	(70,000.00)
11/21/2017		Manoj & Zankhana acct ...7977		(40,000.00)
2017		Cumulative AMEX payments <i>including these transactions &gt; \$10,000</i>	luxury personal items	(302,355.74)
10/23/2017		Alain Delone mens	charge to Amex card	(11,832.00)
12/13/2017		Malani Jewelers	charge to Amex card	(13,000.00)

**Booray Group, LLC**  
**Ameris Bank acct# ...2403**

2017		COAM Master sweeps		169,699.65
6/6/2017		Krishna Amusement acct ...1719		(50,000.00)
5/2/2017		Krishna Amusement acct ...4692		20,000.00
6/20/2017		Manoj & Zankhana acct ...7977		(50,000.00)

<u>Date</u>	<u>Ck #</u>	<u>Name/Payee</u>	<u>Explanation</u>	<u>Amount</u>
<b>Booray Group, LLC</b>				
Wells Fargo acct# ...6993				
7/17/2017	1005	Anjaneya Inv. acct ...0639		(70,000.00)
8/8/2017	1010	Anjaneya Inv. acct ...0639		(70,000.00)
9/5/2017	1012	Anjaneya Inv. acct ...0639		(80,000.00)
10/18/2017	1018	Anjaneya Inv. acct ...0639		(100,000.00)
11/14/2017	1021	Anjaneya Inv. acct ...0639		(70,000.00)
12/14/2017	1022	Krishna Amusement acct ...1719	check payable to Manoj Patel	(100,000.00)
<b>AnJanEya Investments, Inc.</b>				
Ameris Bank acct# ...0639				
7/17/2017		Booray Group acct ...6993		70,000.00
8/7/2017		Booray Group acct ...6993		70,000.00
9/5/2017		Booray Group acct ...6993		80,000.00
10/18/2017		Booray Group acct ...6993		100,000.00
11/14/2017		Booray Group acct ...6993		70,000.00
8/17/2017		PNP Amusement acct ...2386		300,000.00
9/5/2017		PNP Amusement acct ...2386		130,000.00
1/25/2017		S&W Amusements acct# ...6898		205,754.41
2/15/2017		S&W Amusements acct# ...6898		184,693.66
3/22/2017		S&W Amusements acct# ...6898		273,302.40
4/19/2017		S&W Amusements acct# ...6898		226,337.54
5/16/2017		S&W Amusements acct# ...6898		123,834.29
6/14/2017		S&W Amusements acct# ...6898		25,552.88
7/11/2017		S&W Amusements acct# ...6898		20,670.09
8/9/2017		S&W Amusements acct# ...6898		14,991.45
9/3/2017		S&W Amusements acct# ...6898		18,000.78
10/4/2017		S&W Amusements acct# ...6898		12,067.47
11/27/2017		S&W Amusements acct# ...6898		14,391.64
12/27/2017		S&W Amusements acct# ...6898		12,739.02
3/16/2017	1013	Krishna Amusement acct ...4692		(200,000.00)
1/9/2017	1022	Myra Parth Irr TR acct ...2253		(502,505.00)
9/25/2017	1042	Myra Parth Irr TR acct ...2253		(700,000.00)
11/20/2017	1044	Myra Parth Irr TR acct ...2253		(300,000.00)

<u>Date</u>	<u>Ck #</u>	<u>Name/Payee</u>	<u>Explanation</u>	<u>Amount</u>
4/12/2017	1056	Lee, Black & Hollies	buy: 376 W. Parker St., Baxley	(10,000.00)
1/29/2017	1061	Manoj Patel	not deposited to known acct	(100,000.00)
4/10/2017	1026	Manoj Patel	not deposited to known acct	(20,000.00)
8/17/2017	1041	Manoj Patel	not deposited to known acct	(10,000.00)
1/6/2017	1060	Parth Patel	not deposited to known acct	(25,000.00)
4/28/2017	1064	Central Industry (El Cheapo gas pump)	construction	(30,000.00)
8/25/2017	1033	South Coast Contracting Group	construction	(44,000.00)
12/28/2016	1049	Franklin Cadillac	auto	(30,000.00)
1/24/2017	1023	GhanShyam Bhin Patel (Hwy 80E, Statesboro)	inducement	(35,000.00)
6/1/2017	1066	Jyoti Patel (Statesboro location)	inducement	(60,000.00)
3/16/2017	1021	Bhavin Patel	probable inducement	(46,500.00)
9/5/2017	1035	Ketan ChaudHari (Jay Ramdev 1, LLC)	inducement	(20,000.00)
4/21/2017	1028	Parth Sarah, Inc. (Fast Stop)	inducement	(15,000.00)
4/3/2017	1062	Sultaan, Inc. (Mukesh Patel)	inducement	(30,000.00)
6/6/2017	1067	Sultaan, Inc. (Mukesh Patel)	inducement	(25,000.00)

### Myra Parth Irrevocable Trust

Ameris Bank acct# ...2253

7/24/2017	PNP Amusement acct ...2386	50,000.00
11/1/2017	PNP Amusement acct ...2386	100,000.00
11/17/2017	PNP Amusement acct ...2386	50,000.00
11/17/2017	Manoj Patel acct ...7977	50,000.00
1/9/2017	Anjaneya Inv. acct ...0639	502,505.00
9/25/2017	Anjaneya Inv. acct ...0639	700,000.00
11/20/2017	Anjaneya Inv. acct ...0639	300,000.00
4/20/2017	Lee, Black, Hollis wire	to purchase real estate (229,044.57)
5/11/2017	Lee, Black, Hollis wire	to purchase real estate (269,564.95)
6/21/2017	Lee, Black, Hollis wire	to purchase real estate (182,261.22)

<u>Date</u>	<u>Ck #</u>	<u>Name/Payee</u>	<u>Explanation</u>	<u>Amount</u>
9/27/2017		Wright, Edwards, attys	to purchase real estate	(703,098.30)
S&W Amusements Inc				
BB&T acct# ...6898				
2017		COAM Master sweeps		6,553,768.12
4/4/2017		BB&T (mortgage payment)	Nital personal residence	(100,000.00)
9/18/2017	1191	Ahana Investments acct ...5207		(30,000.00)
9/24/2017	1302	Ahana Investments acct ...5207		(50,000.00)
10/5/2017	1193	Ahana Investments acct ...5207		(50,000.00)
11/1/2017	1204	Ahana Investments acct ...5207		(30,000.00)
11/7/2017	1305	Ahana Investments acct ...5207		(19,000.00)
11/30/2017	1208	Ahana Investments acct ...5207		(30,000.00)
12/6/2017	1210	Ahana Investments acct ...5207		(20,000.00)
8/15/2017	1184	Miraya Investments acct...2365		(310,000.00)
8/22/2017	1186	Miraya Investments acct...2365		(250,000.00)
11/30/2017	1207	Miraya Investments acct...2365		(20,000.00)
1/20/2017	1274	Miraya Ahana Irr TR acct ...2316		(90,000.00)
2/6/2017	1159	Miraya Ahana Irr TR acct ...2316		(55,000.00)
3/3/2017	1161	Miraya Ahana Irr TR acct ...2316		(245,000.00)
3/22/2017	1163	Miraya Ahana Irr TR acct ...2316		(90,000.00)
6/13/2017	1171	Miraya Ahana Irr TR acct ...2316		(85,000.00)
7/5/2017	1298	Miraya Ahana Irr TR acct ...2316		(125,000.00)
7/19/2017	1179	Miraya Ahana Irr TR acct ...2316		(40,000.00)
9/6/2017	1190	Miraya Ahana Irr TR acct ...2316		(40,000.00)
10/13/2017	1197	Miraya Ahana Irr TR acct ...2316		(330,000.00)
10/20/2017	1200	Miraya Ahana Irr TR acct ...2316		(41,000.00)
10/25/2017	1201	Miraya Ahana Irr TR acct ...2316		(75,138.56)
11/2/2017	1205	Miraya Ahana Irr TR acct ...2316		(60,000.00)
11/27/2017	1309	Miraya Ahana Irr TR acct ...2316		(86,000.00)
12/12/2017	1213	Miraya Ahana Irr TR acct ...2316		(91,000.00)
7/28/2017	1182	N&S Investments acct ...0103		(150,000.00)
1/25/2017	1276	Anjaneya Investments acct# ...0639		(205,754.41)
2/15/2017	1280	Anjaneya Investments acct# ...0639		(184,693.66)
3/22/2017	1283	Anjaneya Investments acct# ...0639		(273,302.40)
4/19/2017	1287	Anjaneya Investments acct# ...0639		(226,337.54)
5/16/2017	1294	Anjaneya Investments acct# ...0639		(123,834.29)
6/14/2017	1297	Anjaneya Investments acct# ...0639		(25,552.00)

<u>Date</u>	<u>Ck #</u>	<u>Name/Payee</u>	<u>Explanation</u>	<u>Amount</u>
7/11/2017	1299	Anjaneya Investments acct# ...0639		(20,670.09)
8/9/2017	1183	Anjaneya Investments acct# ...0639		(14,991.45)
9/3/2017	1301	Anjaneya Investments acct# ...0639		(18,000.78)
10/4/2017	1304	Anjaneya Investments acct# ...0639		(12,067.47)
11/27/2017	1308	Anjaneya Investments acct# ...0639		(14,391.64)
12/27/2017	1311	Anjaneya Investments acct# ...0639		(12,739.02)
1/5/2017	1149	S&W Amusements acct ...3171	for Samir Patel's use	(30,700.00)
1/31/2017	1157	S&W Amusements acct ...3171	for Samir Patel's use	(27,989.59)
3/29/2017	1284	S&W Amusements acct ...3171	for Samir Patel's use	(73,156.00)
4/27/2017	1289	S&W Amusements acct ...3171	for Samir Patel's use	(39,741.51)
6/7/2017	1170	S&W Amusements acct ...3171	for Samir Patel's use	(36,943.09)
6/25/2017	1173	S&W Amusements acct ...3171	for Samir Patel's use	(40,110.72)
9/27/2017	1303	S&W Amusements acct ...3171	for Samir Patel's use	(37,097.63)
10/31/2017	1202	S&W Amusements acct ...3171	for Samir Patel's use	(24,481.96)
11/28/2017	1310	S&W Amusements acct ...3171	for Samir Patel's use	(29,900.66)
1/4/2017	1148	S&W Amusements acct ...2522		(25,000.00)
1/10/2017	1150	S&W Amusements acct ...2522		(25,000.00)
1/19/2017	1151	S&W Amusements acct ...2522		(20,000.00)
1/31/2017	1156	S&W Amusements acct ...2522		(13,000.00)
2/6/2017	1158	S&W Amusements acct ...2522		(50,000.00)
2/14/2017	1277	S&W Amusements acct ...2522		(25,000.00)
2/15/2017	1278	S&W Amusements acct ...2522		(50,000.00)
3/2/2017	1160	S&W Amusements acct ...2522		(15,000.00)
3/7/2017	1162	S&W Amusements acct ...2522		(50,000.00)
3/29/2017	1285	S&W Amusements acct ...2522		(73,426.00)
4/19/2017	1165	S&W Amusements acct ...2522		(50,000.00)
4/30/2017	1291	S&W Amusements acct ...2522		(50,000.00)
6/3/2017	1168	S&W Amusements acct ...2522		(30,000.00)
6/12/2017	1296	S&W Amusements acct ...2522		(60,000.00)
6/27/2017	1172	S&W Amusements acct ...2522		(30,000.00)
7/17/2017	1178	S&W Amusements acct ...2522		(20,000.00)
7/27/2017	1181	S&W Amusements acct ...2522		(30,000.00)
6/29/2017	1174	Parth Patel	not deposited into known acct	(50,000.00)
1/25/2017	1152	C.M.C.	construction co. invoice	(50,000.00)
2/26/2017	1153	C.M.C.	construction co. invoice	(25,000.00)
3/31/2017	1286	C.M.C.	construction co. invoice	(13,733.50)
5/1/2017	1290	C.M.C.	construction co. invoice	(36,289.60)
6/6/2017	1295	C.M.C.	construction co. invoice	(50,082.20)
7/11/2017	1175	C.M.C.	construction co. invoice	(65,823.60)
8/15/2017	1176	C.M.C.	construction co. invoice	(65,823.60)
10/16/2017	1196	C.M.C.	construction co. invoice	(124,724.32)

<u>Date</u>	<u>Ck #</u>	<u>Name/Payee</u>	<u>Explanation</u>	<u>Amount</u>
2017		Cumulative AMEX payments	personal luxury items	(238,555.83)
11/22/2017	1307	Harsh Patel	probable inducement	(40,000.00)
4/21/2017	1166	KUNJ Construction USA, Inc.	inducement	(70,000.00)

## S&amp;W Amusements Inc

The Heritage Bank acct# ...2522

1/4/2017		S&W Amusements acct ...6898		25,000.00
1/10/2017		S&W Amusements acct ...6898		25,000.00
1/19/2017		S&W Amusements acct ...6898		20,000.00
1/31/2017		S&W Amusements acct ...6898		13,000.00
2/6/2017		S&W Amusements acct ...6898		50,000.00
2/14/2017		S&W Amusements acct ...6898		25,000.00
2/15/2017		S&W Amusements acct ...6898		50,000.00
3/2/2017		S&W Amusements acct ...6898		15,000.00
3/7/2017		S&W Amusements acct ...6898		50,000.00
3/29/2017		S&W Amusements acct ...6898		73,426.00
4/19/2017		S&W Amusements acct ...6898		50,000.00
5/1/2017		S&W Amusements acct ...6898		50,000.00
6/5/2017		S&W Amusements acct ...6898		30,000.00
6/13/2017		S&W Amusements acct ...6898		60,000.00
6/27/2017		S&W Amusements acct ...6898		30,000.00
7/18/2017		S&W Amusements acct ...6898		20,000.00
7/27/2017		S&W Amusements acct ...6898		30,000.00
2/1/2017		Ahana Investments ...5207		(13,000.00)
2/7/2017		Ahana Investments ...5207		(30,000.00)
2/14/2017		Ahana Investments ...5207		(25,000.00)
2/15/2017		Ahana Investments ...5207		(50,000.00)
3/7/2017		Ahana Investments ...5207		(25,000.00)
3/29/2017		Ahana Investments ...5207		(50,000.00)
5/1/2017		Ahana Investments ...5207		(44,000.00)
6/5/2017		Ahana Investments ...5207		(30,000.00)
6/28/2017		Ahana Investments ...5207		(30,000.00)
6/13/2017		Ahana Investments ...5207		(60,000.00)
7/28/2017		Ahana Investments ...5207		(30,000.00)
1/5/2017		Miraya Investments ...2365		(25,000.00)
1/11/2017		Miraya Investments ...2365		(25,000.00)
2/7/2017		Miraya Investments ...2365		(20,000.00)

<u>Date</u>	<u>Ck #</u>	<u>Name/Payee</u>	<u>Explanation</u>	<u>Amount</u>
3/2/2017		Miraya Investments ...2365		(15,000.00)
3/7/2017		Miraya Investments ...2365		(25,000.00)
4/19/2017		Cashier's check		(50,000.00)
<b>S&amp;W Amusements Inc</b>				
Synovus Bank acct# ...3171				
1/6/2017		S&W Amusements acct ...6898		30,700.00
2/7/2017		S&W Amusements acct ...6898		27,989.59
3/31/2017		S&W Amusements acct ...6898		73,156.00
5/3/2017		S&W Amusements acct ...6898		39,741.51
6/16/2017		S&W Amusements acct ...6898		36,943.09
6/29/2017		S&W Amusements acct ...6898		40,110.72
9/27/2017		S&W Amusements acct ...6898		37,097.63
10/31/2017		S&W Amusements acct ...6898		24,481.96
11/30/2017		S&W Amusements acct ...6898		29,900.66
7/18/2017		N&S Investments acct ...0103		(160,000.00)
10/5/2017		N&S Investments acct ...0103		(18,500.00)
12/8/2017		N&S Investments acct ...0103		(22,000.00)
4/14/2017		withdrawal	customer debit	(17,750.00)
<b>N&amp;S Investments, Inc.</b>				
The Heritage Bank acct# ...0103				
7/18/2017		S&W Amusements acct ...3171		160,000.00
10/5/2017		S&W Amusements acct ...3171		18,500.00
12/8/2017		S&W Amusements acct ...3171		22,000.00
7/28/2017		S&W Amusements acct ...6898	S&W Amuse acct# ...6898	150,000.00
7/31/2017		TRSMH,LLC (real estate closing atty)	to purchase real estate	(292,317.52)

<u>Date</u>	<u>Ck #</u>	<u>Name/Payee</u>	<u>Explanation</u>	<u>Amount</u>
Ahana Investments, Inc.				
The Heritage Bank acct# ...5207				
9/19/2017		S&W Amusements acct ...6898		30,000.00
9/25/2017		S&W Amusements acct ...6898		50,000.00
10/10/2017		S&W Amusements acct ...6898		50,000.00
11/1/2017		S&W Amusements acct ...6898		30,000.00
11/7/2017		S&W Amusements acct ...6898		19,000.00
11/30/2017		S&W Amusements acct ...6898		30,000.00
12/7/2017		S&W Amusements acct ...6898		20,000.00
2/1/2017		S&W Amusements acct ...2522		13,000.00
2/7/2017		S&W Amusements acct ...2522		30,000.00
2/14/2017		S&W Amusements acct ...2522		25,000.00
2/15/2017		S&W Amusements acct ...2522		50,000.00
3/7/2017		S&W Amusements acct ...2522		25,000.00
3/29/2017		S&W Amusements acct ...2522		50,000.00
5/1/2017		S&W Amusements acct ...2522		44,000.00
6/5/2017		S&W Amusements acct ...2522		30,000.00
6/13/2017		S&W Amusements acct ...2522		60,000.00
6/28/2017		S&W Amusements acct ...2522		30,000.00
7/28/2017		S&W Amusements acct ...2522		30,000.00
2/9/2017		Miraya Investments acct...2365		20,000.00
4/24/2017		Miraya Investments acct...2365		25,000.00
7/12/2017		Miraya Investments acct...2365		(20,000.00)
2/9/2017	1013	CMHS, Inc. Reidsville	Daisy (mobile home)	(10,063.31)
8/4/2017		Cashier's Check (Alpesh Patel)	probable inducement	(22,140.00)
11/6/2017		Cashier's Check	probable inducement	(10,766.00)
4/20/2017	1025	KUNJ Investments (Dellwood)	inducement	(30,471.38)
4/20/2017	1026	KUNJ Investments (Exxon)	inducement	(30,550.51)
4/20/2017	1027	KUNJ Investments (PioNono)	inducement	(28,656.74)
7/28/2017	1040	KUNJ Investments (Exxon)	inducement	(27,123.86)
7/28/2017	1041	KUNJ Investments (PioNono)	inducement	(14,619.72)
10/23/2017	1042	KUNJ Investments (Dellwood)	inducement	(29,953.31)
12/29/2017	1081	KUNJ Investments	inducement	(23,612.39)
4/3/2017	1023	Ashok C. Patel (Macon)	inducement	(10,510.00)
3/31/2017	1012	Jignesh Patel (PioNono)	inducement	(13,485.92)

<u>Date</u>	<u>Ck #</u>	<u>Name/Payee</u>	<u>Explanation</u>	<u>Amount</u>
4/1/2017	1029	MuniLal M. Patel (Exit 9)	inducement	(13,076.36)
7/28/2017	1039	MuniLal M. Patel	inducement	(12,979.85)
3/31/2017	1021	Arvind Patel (4 locations)	inducement	(73,426.50)
1/31/2017	1008	Nitin D. Patel	probable inducement	(13,000.00)
2/13/2017	1010	Prakash P. Patel	inducement	(51,809.58)

Miraya Investments LLC  
The Heritage Bank acct# ...2365

8/2/2017	1186	S&W Amusements acct ...6898		250,000.00
8/15/2017	1184	S&W Amusements acct ...6898		310,000.00
11/30/2017	1207	S&W Amusements acct ...6898		20,000.00
1/5/2017		S&W Amusements acct ...2522		25,000.00
1/11/2017		S&W Amusements acct ...2522		25,000.00
2/7/2017		S&W Amusements acct ...2522		20,000.00
3/2/2017		S&W Amusements acct ...2522		15,000.00
3/7/2017		S&W Amusements acct ...2522		25,000.00
2/9/2017		Ahana Investments acct ...5207		(20,000.00)
4/24/2017		Ahana Investments acct ...5207		(25,000.00)
7/12/2017		Ahana Investments acct ...5207		20,000.00
8/22/2017		Cashiers Check	real estate purchase	(543,038.58)
1/16/2017	1175	Anilkumar Patel	probable inducement	(25,909.94)
3/5/2017	1121	Dhanish Amin	probable inducement	(11,000.00)
1/16/2017	1174	Jaiminkumar Patel	probable inducement	(25,909.94)
6/25/2017	1184	Pankaj Patel	probable inducement	(17,500.00)

<u>Date</u>	<u>Ck #</u>	<u>Name/Payee</u>	<u>Explanation</u>	<u>Amount</u>
Miraya Ahana Irrevocable Trust				
The Heritage Bank acct# ...2316				
1/20/2017	1274	S&W Amusements acct ...6898		90,000.00
2/6/2017	1159	S&W Amusements acct ...6898		55,000.00
3/3/2017	1161	S&W Amusements acct ...6898		245,000.00
3/22/2017	1163	S&W Amusements acct ...6898		90,000.00
6/13/2017	1171	S&W Amusements acct ...6898		85,000.00
7/5/2017	1298	S&W Amusements acct ...6898		125,000.00
7/19/2017	1179	S&W Amusements acct ...6898		40,000.00
9/6/2017	1190	S&W Amusements acct ...6898		40,000.00
10/13/2017	1197	S&W Amusements acct ...6898		330,000.00
10/20/2017	1200	S&W Amusements acct ...6898		41,000.00
10/25/2017	1201	S&W Amusements acct ...6898		75,138.56
11/2/2017	1205	S&W Amusements acct ...6898		60,000.00
11/28/2017	1309	S&W Amusements acct ...6898		86,000.00
12/12/2017	1213	S&W Amusements acct ...6898		91,000.00
6/5/2017		Cashiers Check	real estate purchase	(115,000.00)
6/30/2017		Cashiers Check	real estate purchase	(85,000.00)
7/18/2017		Cashiers Check	real estate purchase	(121,000.00)
8/8/2017		Cashiers Check	real estate purchase	(238,621.46)
8/31/2017		Cashiers Check	real estate purchase	(146,375.29)
9/5/2017		Cashiers Check	real estate purchase	(175,000.00)
9/19/2017		Cashiers Check	real estate purchase	(43,478.38)
9/20/2017		Cashiers Check	real estate purchase	(302,494.78)
10/2/2017		Cashiers Check	real estate purchase	(110,000.00)
10/16/2017		Cashiers Check	real estate purchase	(395,000.00)
1/20/2017	1015	Shree Saj LLC	inducement	(90,000.00)
9/30/2017	1024	Hermant Patel	inducement	(50,000.00)
2/24/2017	1009	Munilal M Patel	inducement	(50,000.00)
2/24/2017	1011	Munilal M Patel	inducement	(50,000.00)
6/20/2017	1017	Munilal M Patel	inducement	(25,000.00)
6/20/2017	1020	Munilal M Patel	inducement	(50,000.00)
6/20/2017	1023	Munilal M Patel	inducement	(50,000.00)

## Exhibit B - 2018

Legend: the numbers in black indicate a deposit, or funds coming into the named bank account,  
the numbers in red and with parentheses indicate funds coming out of the named bank account

Krishna Amusement, Inc.  
Ameris Bank acct# ...4692

<u>Date</u>	<u>Ck #</u>	<u>Name</u>	<u>Explanation</u>	<u>Amount</u>
11/1/2018		Krishna Amusement acct ...1719		25,000.00
11/6/2018		Krishna Amusement acct ...1719		20,000.00
12/3/2018		Krishna Amusement acct ...1719		50,000.00
12/18/2018		Krishna Amusement acct ...1719		20,000.00
12/17/2018		Anjaneya Inv. acct ...0639		(70,000.00)
12/5/2018		Customer debit	cash withdrawal	(25,000.00)
12/19/2018	2016 Manoj Patel		not deposited to known acct	(20,000.00)

Krishna Amusement, Inc.  
Ameris Bank acct# ...1719

2018		COAM Master sweeps		615,849.34
12/11/2018		Anjaneya Inv. acct ...0639		(35,000.00)
7/18/2018		Myra Parth Irr TR acct ...2253		(100,000.00)
8/8/2018		Myra Parth Irr TR acct ...2253		(40,000.00)
1/8/2018		PNP Amusement acct ...2386		90,000.00
4/2/2018		PNP Amusement acct ...2386		40,000.00
5/4/2018		Manoj Patel savings acct ...2762		30,000.00
11/1/2018		Krishna Amusement acct ...4692		(25,000.00)
11/6/2018		Krishna Amusement acct ...4692		(20,000.00)
12/3/2018		Krishna Amusement acct ...4692		(50,000.00)
12/18/2018		Krishna Amusement acct ...4692		(20,000.00)
5/2/2018		Manoj & Zankhana acct ...7977		30,000.00
2/14/2018		Debit - cash	withdrawal	(15,000.00)

<u>Date</u>	<u>Ck #</u>	<u>Name</u>	<u>Explanation</u>	<u>Amount</u>
4/5/2018	1004	North Florida Lincoln	1 auto	(101,029.25)
8/31/2018	1047	NeelKumar M ChaudHari	"PAYCHECK" <i>employee of Mukesh Patel</i>	(15,000.00)
PNP Amusement Games, LLC Ameris Bank acct# ...2386				
2018		COAM Master sweeps		2,375,337.38
2/13/2018	1297	Anjaneya Inv. acct ...0639		(250,000.00)
3/22/2018	1306	Anjaneya Inv. acct ...0639		(250,000.00)
4/24/2018	1345	Anjaneya Inv. acct ...0639		(150,000.00)
6/5/2018	1317	Anjaneya Inv. acct ...0639		(140,000.00)
7/10/2018	1319	Anjaneya Inv. acct ...0639		(100,000.00)
7/25/2018		Anjaneya Inv. acct ...0639		(60,000.00)
8/23/2018		Anjaneya Inv. acct ...0639		(70,000.00)
9/5/2018		Anjaneya Inv. acct ...0639		(50,000.00)
9/19/2018		Anjaneya Inv. acct ...0639		(60,000.00)
10/16/2018		Anjaneya Inv. acct ...0639		(100,000.00)
12/4/2018	1390	Anjaneya Inv. acct ...0639		(230,000.00)
12/17/2018		Anjaneya Inv. acct ...0639		(45,000.00)
1/8/2018		Krishna Amusement acct ...1719		(90,000.00)
4/2/2018		Krishna Amusement acct ...1719		(40,000.00)
6/27/2018		Myra Parth Irr TR acct ...2253		(100,000.00)
8/8/2018		Myra Parth Irr TR acct ...2253		(50,000.00)
12/17/2018		Myra Parth Irr TR acct ...2253		(70,000.00)
12/27/2018		Myra Parth Irr TR acct ...2253		(40,000.00)
2018		Cumulative AMEX payments <i>including these transactions &gt; \$10,000</i>	luxury personal items	(419,611.77)
5/26/2018		Malani Jewelers	charge to Amex card	(35,000.00)
7/30/2018		NBS-College/University	charge to Amex card	(10,146.00)
7/28/2018		Malani Jewelers	charge to Amex card	(13,000.00)
11/8/2018		Malani Jewelers	charge to Amex card	(21,000.00)
11/27/2018		Bulgari 5th Ave.	charge to Amex card	(15,850.00)
12/15/2018		Malani Jewelers	charge to Amex card	(30,000.00)
12/24/2018		Bulgari 5th Ave.	charge to Amex card	(20,000.00)

<u>Date</u>	<u>Ck #</u>	<u>Name</u>	<u>Explanation</u>	<u>Amount</u>
<b>Booray Group, LLC</b>				
<b>Wells Fargo acct# ...6993</b>				
2018		COAM Master sweeps		1,160,343.71
2/13/2018	1033	Anjaneya Inv. acct ...0639		(110,000.00)
3/19/2018	1037	Anjaneya Inv. acct ...0639		(150,000.00)
4/22/2018	1044	Anjaneya Inv. acct ...0639		(100,000.00)
6/4/2018	1050	Anjaneya Inv. acct ...0639		(80,000.00)
7/10/2018	1055	Anjaneya Inv. acct ...0639		(100,000.00)
7/25/2018	1059	Anjaneya Inv. acct ...0639		(40,000.00)
8/14/2018	1062	Anjaneya Inv. acct ...0639		(60,000.00)
9/5/2018	1068	Anjaneya Inv. acct ...0639		(60,000.00)
10/24/2018	1083	Anjaneya Inv. acct ...0639		(115,000.00)
5/21/2018		withdrawal	cash-out	(10,010.00)
2018		Cumulative AMEX payments (for Manoj Patel)	luxury personal items	(172,384.99)

**AnJanEya Investments, Inc.**  
**Ameris Bank acct# ...0639**

2/13/2018		Booray Group acct ...6993		110,000.00
3/19/2018		Booray Group acct ...6993		150,000.00
4/22/2018		Booray Group acct ...6993		100,000.00
6/4/2018		Booray Group acct ...6993		80,000.00
7/10/2018		Booray Group acct ...6993		100,000.00
7/25/2018		Booray Group acct ...6993		40,000.00
8/14/2018		Booray Group acct ...6993		60,000.00
9/5/2018		Booray Group acct ...6993		60,000.00
10/24/2018		Booray Group acct ...6993		115,000.00
2/13/2018		PNP Amusement acct ...2386		250,000.00
3/19/2018		PNP Amusement acct ...2386		250,000.00
4/24/2018		PNP Amusement acct ...2386		150,000.00
6/4/2018		PNP Amusement acct ...2386		140,000.00
7/10/2018		PNP Amusement acct ...2386		100,000.00
7/25/2018		PNP Amusement acct ...2386		60,000.00
8/23/2018		PNP Amusement acct ...2386		70,000.00
9/5/2018		PNP Amusement acct ...2386		50,000.00
9/19/2018		PNP Amusement acct ...2386		60,000.00
10/16/2018		PNP Amusement acct ...2386		100,000.00
12/3/2018		PNP Amusement acct ...2386		230,000.00
12/18/2018		PNP Amusement acct ...2386		45,000.00

<u>Date</u>	<u>Ck #</u>	<u>Name</u>	<u>Explanation</u>	<u>Amount</u>
1/25/2018		S&W Amusements acct ...6898		11,610.05
3/19/2018		S&W Amusements acct ...6898		13,169.31
12/11/2018		Krishna Amusement acct ...1719		35,000.00
12/17/2018		Krishna Amusement acct ...4692		70,000.00
8/2/2018		Cash	Cash-out	(25,000.00)
8/2/2018		Debit	Cash-out	(25,000.00)
10/9/2018		Cash	Cash-out	(20,000.00)
4/11/2018		Lee, Black & Hollies	real estate purchase	(682,951.34)
7/10/2018	1081	Lee, Black & Hollies	real estate purchase	(25,000.00)
10/5/2018		Lee, Black & Hollies	real estate purchase	(502,670.01)
3/13/2018		Weiner, Shearouse W	real estate purchase	(250,308.95)
8/20/2018	1084	TJ Hollies, PC	purchase: 2109 W. Bay St.	(13,750.00)
9/20/2018	1093	South Coast Contracting Group	Gas Station	(105,000.00)
9/10/2018	1089	Johnson Laux Construction	Invoice	(12,500.00)
12/3/2018	1109	Johnson Laux Construction	construction	(65,000.00)
11/26/2018	1107	Bharti Ben Patel (Savannah Mall Shell)	inducement	(19,700.00)
4/10/2018	1079	Kirit Patel (Adi Shakti Trading)	inducement	(40,000.00)
8/21/2018	1086	ParthSarah, Inc. (Fast Stop) <i>COAM location in 2018, not current</i>	inducement	(15,000.00)

**Myra Parth Irrevocable Trust**  
**Ameris Bank account# ...2253**

7/18/2018		Krishna Amusement acct ...1719		100,000.00
8/8/2018		Krishna Amusement acct ...1719		40,000.00
6/26/2018		PNP Amusement acct ...2386		100,000.00
8/8/2018		PNP Amusement acct ...2386		50,000.00
12/17/2018		PNP Amusement acct ...2386		70,000.00
12/27/2018		PNP Amusement acct ...2386		40,000.00
12/17/2018		Manoj & Zankhana acct ...7977		20,000.00

<u>Date</u>	<u>Ck #</u>	<u>Name</u>	<u>Explanation</u>	<u>Amount</u>
3/28/2018		Ameris Bank (loan# ...0707)	p/off 1057-1067 US Hwy	(316,994.68)
3/28/2018		Ameris Bank (loan# ...0813)	p/off 6606 Waters Ave.	(378,765.26)
3/28/2018		Ameris Bank (loan# ...1101)	p/off 1101 Eisenhower Dr.	(167,709.80)
8/2/2018		Lee, Black, Hollis wire	to purchase real estate	(267,957.76)
10/3/2018		Lee, Black, Hollis wire	to purchase real estate	(263,966.86)

S&W Amusements Inc  
BB&T acct# ...6898

2018		COAM Master sweeps		5,062,490.11
1/2/2018	1216	Ahana Investments acct ...5207		(50,000.00)
1/9/2018	1217	Ahana Investments acct ...5207		(40,000.00)
1/19/2018	1219	Ahana Investments acct ...5207		(50,000.00)
1/29/2018	1222	Ahana Investments acct ...5207		(25,000.00)
1/31/2018	1223	Ahana Investments acct ...5207		(25,000.00)
2/14/2018	1228	Ahana Investments acct ...5207		(25,000.00)
3/1/2018	1232	Ahana Investments acct ...5207		(30,000.00)
3/12/2018	1236	Ahana Investments acct ...5207		(44,975.00)
3/26/2018	1241	Ahana Investments acct ...5207		(30,000.00)
3/28/2018	1244	Ahana Investments acct ...5207		(70,000.00)
4/7/2018	1322	Ahana Investments acct ...5207		(50,000.00)
4/17/2018	1249	Ahana Investments acct ...5207		(30,000.00)
4/23/2018	1250	Ahana Investments acct ...5207		(20,000.00)
6/5/2018	1326	Ahana Investments acct ...5207		(20,000.00)
6/18/2018	1396	Ahana Investments acct ...5207		(45,000.00)
7/3/2018	1397	Ahana Investments acct ...5207		(30,000.00)
7/12/2018	1399	Ahana Investments acct ...5207		(50,000.00)
7/15/2018	1328	Ahana Investments acct ...5207		(78,000.00)
7/18/2018	1400	Ahana Investments acct ...5207		(30,000.00)
7/26/2018	1330	Ahana Investments acct ...5207		(20,000.00)
7/31/2018	1332	Ahana Investments acct ...5207		(25,000.00)
8/1/2018	1334	Ahana Investments acct ...5207		(50,000.00)
8/15/2018	1336	Ahana Investments acct ...5207		(20,000.00)
10/17/2018	1406	Ahana Investments acct ...5207		(20,000.00)
12/5/2018	1413	Ahana Investments acct ...5207		(30,000.00)
3/13/2018	1237	Miraya Investments acct...2365		(85,925.00)
4/12/2018	1246	Miraya Investments acct...2365		(50,000.00)
4/30/2018	1251	Miraya Investments acct...2365		(310,000.00)
5/31/2018	1325	Miraya Investments acct...2365		(28,250.00)
6/18/2018	1395	Miraya Investments acct...2365		(60,000.00)
7/12/2018	1327	Miraya Investments acct...2365		(78,000.00)

<u>Date</u>	<u>Ck #</u>	<u>Name</u>	<u>Explanation</u>	<u>Amount</u>
8/7/2018	1402	Miraya Investments acct...2365		(70,000.00)
10/17/2018	1405	Miraya Investments acct...2365		(50,956.72)
11/26/2018	1409	Miraya Investments acct...2365		(60,450.00)
11/26/2018	1411	Miraya Investments acct...2365		(25,000.00)
1/29/2018	1221	Miraya Ahana Irr TR acct ...2316		(27,000.00)
1/31/2018	1224	Miraya Ahana Irr TR acct ...2316		(45,000.00)
2/14/2018	1229	Miraya Ahana Irr TR acct ...2316		(50,000.00)
3/12/2018	1319	Miraya Ahana Irr TR acct ...2316		(298,000.00)
3/28/2018	1243	Miraya Ahana Irr TR acct ...2316		(40,000.00)
4/11/2018	1245	Miraya Ahana Irr TR acct ...2316		(156,000.00)
4/17/2018	1248	Miraya Ahana Irr TR acct ...2316		(16,232.00)
2018		Cumulative AMEX payments	personal luxury items	(435,153.28)
3/8/2018	1234	S&W Amusements acct ...3171	for Samir Patel's use	(24,193.52)
3/28/2018	1242	S&W Amusements acct ...3171	for Samir Patel's use	(37,963.96)
6/5/2018	1398	S&W Amusements acct ...3171	for Samir Patel's use	(30,464.97)
8/1/2018	1333	S&W Amusements acct ...3171	for Samir Patel's use	(29,605.69)
12/28/2018	1414	S&W Amusements acct ...3171	for Samir Patel's use	(34,722.37)
5/29/2018	1323	Samir Patel	not deposited to known acct	(64,399.56)
9/5/2018	1403	S&W Amusements acct ...2522		(280,000.00)
10/17/2018	1407	S&W Amusements acct ...2522		(18,776.86)
1/25/2018	1312	Anjaneya Inv. acct ...0639		(11,610.05)
3/19/2018	1320	Anjaneya Inv. acct ...0639		(13,169.31)
4/5/2018	1252	Paramjit Chohan	construction	(16,234.20)
6/15/2018	1394	Paramjit Chohan	of store 1525 #102 Miraya Plaza	(38,765.80)
3/16/2018	1239	Franklin Chevrolet	auto	(25,500.00)
3/26/2018	1240	Franklin Chevrolet	auto	(52,503.00)

S&W Amusements Inc  
The Heritage Bank acct# ...2522

9/5/2018		S&W Amusements acct ...6898		280,000.00
10/17/2018		S&W Amusements acct ...6898		18,776.86

<u>Date</u>	<u>Ck #</u>	<u>Name</u>	<u>Explanation</u>	<u>Amount</u>
<b>S&amp;W Amusements Inc</b>				
Synovus Bank acct# ...3171				
3/12/2018		S&W Amusements acct ...6898		24,193.52
4/3/2018		S&W Amusements acct ...6898		37,963.96
7/11/2018		S&W Amusements acct ...6898		30,464.97
8/10/2018		S&W Amusements acct ...6898		29,605.69
12/28/2018		S&W Amusements acct ...6898		34,722.37
9/6/2018		N&S Investments acct ...0103		(14,000.00)
4/16/2018		withdrawal	customer debit	(18,750.00)
8/10/2018		withdrawal	customer debit	(16,600.00)
9/26/2018		withdrawal	customer debit	(13,000.00)
<b>N&amp;S Investments, Inc.</b>				
The Heritage Bank acct# ...0103				
9/6/2018		S&W Amusements acct ...3171		14,000.00
11/7/2018		S&W Amusements acct ...6898		12,853.98
10/17/2018		Cash		(13,000.00)
<b>Ahana Investments, Inc.</b>				
The Heritage Bank acct# ...5207				
1/2/2018		S&W Amusements acct ...6898		50,000.00
1/9/2018		S&W Amusements acct ...6898		40,000.00
1/19/2018		S&W Amusements acct ...6898		50,000.00
1/29/2018		S&W Amusements acct ...6898		25,000.00
1/31/2018		S&W Amusements acct ...6898		25,000.00
2/14/2018		S&W Amusements acct ...6898		25,000.00
3/1/2018		S&W Amusements acct ...6898		30,000.00
3/14/2018		S&W Amusements acct ...6898		44,975.00
3/27/2018		S&W Amusements acct ...6898		30,000.00
3/28/2018		S&W Amusements acct ...6898		70,000.00
4/17/2018		S&W Amusements acct ...6898		30,000.00
4/23/2018		S&W Amusements acct ...6898		20,000.00
4/7/2018		S&W Amusements acct ...6898		50,000.00
6/6/2018		S&W Amusements acct ...6898		20,000.00
6/19/2018		S&W Amusements acct ...6898		45,000.00

<u>Date</u>	<u>Ck #</u>	<u>Name</u>	<u>Explanation</u>	<u>Amount</u>
7/3/2018		S&W Amusements acct ...6898		30,000.00
7/12/2018		S&W Amusements acct ...6898		50,000.00
7/16/2018		S&W Amusements acct ...6898		78,000.00
7/18/2018		S&W Amusements acct ...6898		30,000.00
7/27/2018		S&W Amusements acct ...6898		20,000.00
7/31/2018		S&W Amusements acct ...6898		25,000.00
8/2/2018		S&W Amusements acct ...6898		50,000.00
8/15/2018		S&W Amusements acct ...6898		20,000.00
10/17/2018		S&W Amusements acct ...6898		20,000.00
12/5/2018		S&W Amusements acct ...6898		30,000.00
4/16/2018		Miraya Investments ...2365		15,000.00
5/9/2018		Miraya Investments ...2365		30,000.00
5/14/2018		Miraya Investments ...2365		25,000.00
10/29/2018		Miraya Investments ...2365		90,000.00
3/30/2018	1115 blank		Lexus	(13,211.00)
3/26/2018	1114 Collins Mobile Homes		Daisy	(15,070.43)
1/3/2018	1080 KUNJ Investments		inducement	(22,169.04)
5/7/2018	1251 KUNJ Investments			(19,819.92)
5/10/2018	1252 KUNJ Investments			(20,926.35)
5/11/2018	1253 KUNJ Investments			(23,025.85)
8/6/2018	1136 KUNJ Investments		PioNono	(16,976.00)
8/7/2018	1137 KUNJ Investments		Exxon	(18,315.76)
8/11/2018	1138 KUNJ Investments		Dellwood	(18,898.00)
3/8/2018	1102 Popat S. Patel		Dellwood	(19,372.57)
3/8/2018	1103 Popat S. Patel		Exxon	(23,278.00)
4/5/2018	1254 MuniLal M. Patel		exit 3, exit 9	(12,747.00)
3/28/2018	1120 Amarit J. Patel		possible inducement	(24,444.00)
7/18/2018	1133 Amitaro (sp?), Inc.		possible inducement	(12,500.00)
4/9/2018	1113 Dhaval Patel		possible inducement	(30,283.00)
7/13/2018	1264 HariVadan D. Patel		possible inducement	(28,114.00)
10/31/2018	1270 HariVadan D. Patel		possible inducement	(20,000.00)
1/22/2018	1053 HarshadBhai R. Patel		possible inducement	(14,822.76)
5/14/2018	1119 JayeshKumar A. Patel		possible inducement	(24,444.00)

<u>Date</u>	<u>Ck #</u>	<u>Name</u>	<u>Explanation</u>	<u>Amount</u>
3/30/2018	1112	Jigar Patel	possible inducement	(30,283.00)
8/7/2018	1268	ManekLal Patel	possible inducement	(15,000.00)
10/29/2018	1142	Manish J. Patel	inducement	(17,831.00)
11/5/2018	1144	Manish J. Patel	inducement	(16,338.00)
11/12/2018	1143	Manish J. Patel	inducement	(15,502.00)
4/11/2018	1117	Mohan Singh Purohit	possible inducement	(25,000.00)
7/11/2018	1265	Parth Nitin Bhai Patel	possible inducement	(28,114.00)
7/12/2018	1124	Proud Patel	possible inducement	(25,000.00)
7/13/2018	1125	Proud Patel	possible inducement	(25,000.00)
7/31/2018	1131	RajeshKumar B. Suther	possible inducement	(25,000.00)
1/29/2018	1092	Yash Rajender Patel	possible inducement	(14,214.79)

Miraya Investments LLC  
The Heritage Bank acct# ...2365

3/13/2018		S&W Amusements acct ...6898		85,925.00
4/12/2018	1246	S&W Amusements acct ...6898		50,000.00
4/30/2018	1251	S&W Amusements acct ...6898		310,000.00
6/1/2018	1325	S&W Amusements acct ...6898		28,250.00
6/18/2018	1395	S&W Amusements acct ...6898		60,000.00
7/12/2018	1327	S&W Amusements acct ...6898		78,000.00
8/7/2018	1402	S&W Amusements acct ...6898		70,000.00
10/17/2018	1405	S&W Amusements acct ...6898		50,956.72
11/26/2018	1411	S&W Amusements acct ...6898		25,000.00
11/26/2018	1409	S&W Amusements acct ...6898		60,450.00
5/3/2018	1021	Miraya Ahana Irr TR acct ...2316		1,266,330.76
4/16/2018		Ahana Investments ...5207		(15,000.00)
5/10/2018		Ahana Investments ...5207		(30,000.00)
5/14/2018		Ahana Investments ...5207		(25,000.00)
10/29/2018		Ahana Investments ...5207		(90,000.00)
3/13/2018		Wire Transfer 2603 1302 4809	real estate purchase	(84,925.00)
8/7/2018		Wire Transfer 2608 0703 0357	real estate purchase	(65,799.74)
4/12/2018		Cash		(50,000.00)

<u>Date</u>	<u>Ck #</u>	<u>Name</u>	<u>Explanation</u>	<u>Amount</u>
6/19/2018		Cash		(38,006.00)
7/30/2018		Cash		(183,033.00)
10/7/2018		Cash		(20,000.00)
5/30/2018		Cashiers Check	real estate purchase	(998,003.20)
8/7/2018	1204	Action Signs	Miraya Plaza & District	(25,420.68)
7/12/2018	1199	Jagdish Kumar Patel	possible inducement	(58,000.00)
7/11/2018	1200	Rajender Patel	possible inducement	(20,000.00)

Miraya Ahana Irrevocable Trust  
The Heritage Bank acct# ...2316

1/29/2018	1221	S&W Amusements acct# ...6898		27,000.00
1/31/2018	1224	S&W Amusements acct# ...6898		45,000.00
2/14/2018	1229	S&W Amusements acct# ...6898		50,000.00
3/12/2018	1319	S&W Amusements acct# ...6898		298,000.00
3/28/2018	1243	S&W Amusements acct# ...6898		40,000.00
4/11/2018	1245	S&W Amusements acct# ...6898		156,000.00
4/17/2018	1248	S&W Amusements acct# ...6898		16,232.00
5/3/2018		Miraya Investments acct...2365		(1,266,330.76)
4/3/2018		Cash	real estate purchase	(110,000.00)
4/3/2018		Cash	real estate purchase	(135,000.00)
4/13/2018		Cashiers Check	real estate purchase	(152,499.66)
4/20/2018		Cash	real estate purchase	(191,216.00)
3/30/2018	1018	Sonal Patel	possible inducement	(45,000.00)
3/30/2018	1022	Sonal Patel	possible inducement	(45,000.00)
3/26/2018	1025	Chaitali Patel	possible inducement	(40,000.00)
1/31/2018	1019	Harsida Patel	possible inducement	(25,000.00)

GEORGIA, BIBB COUNTY  
IN THE SUPERIOR COURT OF SAID COUNTY:

THE STATE OF GEORGIA

INDICTMENT NO. 20 CR 78347

V.

**NITAL "NICK" RAVAL,  
MANOJ "RAY" PATEL,  
BHUNICA AMBU,  
SAMIR PATEL,  
ZANKHANA PATEL,  
MUKESHKUMAR PATEL,  
RAHIM MCCARLEY,  
KUNJ PATEL,  
MANISHKUMAR PATEL,  
HIREN PATEL,  
PANTH PATEL,  
ENNIS ODOM,  
NIMISHABEN CHAUDHARI,  
PARTH PATEL,  
RONALD C. HUCKABY  
LARRY TODD MASHBURN**

TRUE/NO Bill this 8<sup>th</sup> day of December, 2020.

  
FOREMAN ~~PERSON~~

WITNESSES:

(✓) Gary Schwab  
661 Mulberry Street  
Macon, GA 31201

(✓) Steven Crum  
13 11<sup>th</sup> Place  
Tybee Island, GA 31328

(✓) Margie Bittick  
6055 Lakeside Commons, Ste 220  
Macon, GA 31210

(✓) Guy Eberhardt  
990 Riverside Drive  
Macon, GA 31201