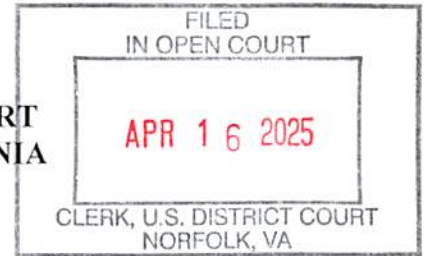


IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Norfolk Division



UNITED STATES OF AMERICA,

v.

ADRIAN KNIGHT,

Defendant.

CRIMINAL NO. 2:25-cr-46

18 U.S.C. § 1349

Conspiracy to Commit Mail, Wire, and
Bank Fraud
(Count 1)

18 U.S.C. § 1343 & 2
Wire Fraud
(Counts 2-4)

18 U.S.C. § 1344 & 2
Bank Fraud
(Counts 5-9)

18 U.S.C. § 1341 & 2
Mail Fraud
(Counts 10-12)

18 U.S.C. § 1956(h) & 2
Conspiracy to Launder Monetary
Instruments
(Count 13)

18 U.S.C. § 1957 & 2
Unlawful Monetary Transactions
(Count 14-19)

18 U.S.C. § 982
Criminal Forfeiture

INDICTMENT

April 2025 Term -- At Norfolk, Virginia

THE GRAND JURY CHARGES THAT:

GENERAL ALLEGATIONS

At all times relevant to this indictment:

1. ADRIAN KNIGHT (“KNIGHT”) is the owner and founder of Ace Auto Sales, LLC (“Ace”), in Chesapeake, Virginia, among other automobile sales companies.

2. Co-Conspirators 1 and 2 (“CC1” and “CC2”) initially co-founded and owned Saint Auto Sales, LLC. (“Saint”), which was established in or about April 2021. KNIGHT operated Saint, either solely or in conjunction with CC2. Ace and Saint are in the same office in Chesapeake, Virginia.

3. Langley Federal Credit Union, Chartway Federal Credit Union, NEA Federal Credit Union, Virginia Credit Union, ABNB Federal Credit Union, 1st Advantage Federal Credit Union, First Tech Federal Credit Union, Navy Federal Credit Union, Redstone Federal Credit Union, and Call Federal Credit Union were financial institutions engaged in, and whose activities affected, interstate commerce and whose deposits were insured by the National Credit Union Share Insurance Fund. These credit unions operated in the Eastern District of Virginia.

4. Atlantic Union Bank, Old Point National Bank, Fifth Third Bank, United Services Automobile Association (“USAA”) Federal Savings Bank, Truist Bank, and Dollar Bank were financial institutions engaged in, and whose activities affected, interstate commerce and whose deposits were insured by the Federal Deposit Insurance Corporation. These banks operated in the Eastern District of Virginia.

COUNT ONE

(Conspiracy to Commit Mail, Wire, and Bank Fraud)

5. The allegations contained in paragraphs 1 through 4 of the General Allegations section of the Indictment are realleged and incorporated as if set forth fully herein.

6. From in or about March 2019 to in or about January 2023, in the Eastern District of Virginia and elsewhere, defendant ADRIAN KNIGHT, and others known and unknown, knowingly and intentionally combined, conspired, confederated and agreed to commit the following offenses against the United States:

(a) Mail Fraud: defendant, and others known and unknown, having devised a scheme and artifice to defraud and to obtain money and property by means of materially false and fraudulent pretenses, representations and promises, did knowingly place and caused to be place in any post office and authorized depository for mail, a matter and thing whatever to be sent and delivered by the Postal Service; did deposit and caused to be deposited a matter and thing whatever to be sent and delivered by any private and commercial interstate carrier; and caused to be delivered by mail and such carrier a matter and thing whatever according to the direction thereon, for the purpose of execution of such scheme and artifice, in violation of Title 18, United States Code, Section 1341; and

(b) Wire Fraud: defendant, and others known and unknown, having devised a scheme and artifice to defraud and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, did transmit and cause to be transmitted, and attempted the same, by means of wire communication in interstate commerce writings, signs, signals, pictures, and sounds for the purpose of execution of such scheme and artifice, in violation of Title 18, United States Code, Section 1343, and;

(a) Bank Fraud: defendant, and others known and unknown, knowingly and intentionally executed and attempted to execute a scheme and artifice to defraud and to obtain

monies, funds, credits, assets, securities, and other property owned by and under the custody and control of financial institution as defined under Title 18, United States Code, Section 20, by means of materially false and fraudulent pretenses, representations, and promises, in violation of Title 18, United States Code, Section 1344.

THE PURPOSE OF THE CONSPIRACY

7. The purpose of the conspiracy was for ADRIAN KNIGHT and others to profit personally by obtaining money and property to which they were not entitled by receiving money from financial institutions based on falsified loan application documents.

THE WAYS, MANNER AND MEANS OF THE CONSPIRACY

The ways, manner, and means by which KNIGHT and others sought to accomplish this conspiracy included, but were not limited to, the following:

8. KNIGHT and others known and unknown to the grand jury created and/or operated Ace and Saint.

9. The conspirators created materially misleading, false, and fraudulent automobile loan applications, through which the applicants knew and would not actually receive the identified automobile.

10. KNIGHT applied for fraudulent automobile loans to financial institutions.

11. KNIGHT also recruited, assisted and caused other individuals, known and unknown to the grand jury, to apply for fraudulent automobile loans to financial institutions.

12. Ace and Saint were listed in the buyer's agreement or the buyer's order that would routinely accompany the fraudulent loan application.

13. In the applications, KNIGHT and others known and unknown to the grand jury provided materially false information such as a Vehicle Identification Number (“VIN”) that was altered or acquired from a vehicle not in inventory.

14. In the applications, KNIGHT and others known and unknown to the grand jury provided materially false information by stating false income and employment data.

15. As a result of the applications, KNIGHT and others known and unknown to the grand jury caused financial institutions to either mail or interstate wire the automobile loan amounts to Ace or Saint.

16. KNIGHT and others known and unknown would deposit the loan checks into Ace’s or Saint’s bank accounts and receive a portion of the loan proceeds.

17. KNIGHT and others known and unknown to the grand jury financially benefitted from the money received through the fraudulent loan applications.

a. CC2 routinely withdrew cash at KNIGHT’s request from Saint’s bank account.

For example, CC2 withdrew \$30,000 in cash in about December 2021.

b. In or about March 2022, KNIGHT obtained a cashier’s check for \$50,000 made payable to an entity created by Co-Conspirator 3 (“CC3”). CC3 deposited the check into Truist Bank account ending 0589.

c. In or about September 2022, CC3 deposited a \$20,000 cashier’s check from Ace’s bank account into one of CC3’s business accounts.

18. In furtherance of the conspiracy:

a. In or about March 2020, KNIGHT submitted an automobile loan application to Atlantic Union Bank for a Land Rover VIN ending 1060 using false employment and income information for approximately \$69,234.25, identifying

Ace in the buyer's agreement. KNIGHT caused Atlantic Union Bank to mail a cashier's check to Ace, which was then deposited into Ace's bank account with Old Point National Bank. No automobile was purchased with the loan proceeds.

- b. In or about March 2020, KNIGHT submitted an automobile loan to NAE Federal Credit Union for a BMW VIN ending 0503 as a customer with Ace using false employment and income information.
- c. In or about June 2020, KNIGHT and Co-Conspirator 4 ("CC4") applied for loans through Langley Federal Credit Union for approximately \$69,997.50 and Chartway Federal Credit Union for approximately \$59,581.50. Both applications included CC4's name and other personal identifying information. They supplied VIN numbers of a Range Rover VIN ending 1060 and a BMW VIN ending 0503, respectively, and both KNIGHT and CC4 knew CC4 would never receive either vehicle. CC4 obtained the entirety of both loans in the form of cashiers' checks on June 12, 2020, and provided the checks to KNIGHT. KNIGHT deposited the checks at Old Point National Bank. KNIGHT retained approximately \$30,000 and CC4 received the balance. No automobile was purchased with the loan proceeds. CC4 then defaulted on the loan.
- d. In or about January 2021, KNIGHT submitted a \$30,000 automobile loan application with ABNB Federal Credit Union for a BMW VIN ending 7566 using false employment and income information, causing ABNB Federal Credit Union to mail a check for \$30,000 to Ace. KNIGHT then deposited the check in Ace's bank account. No automobile was purchased with the loan proceeds.

proceeds.

- e. In or about February 2021, CC3 submitted a \$30,000 automobile loan application for a Ford truck VIN ending 5380 to 1st Advantage Federal Credit Union, causing 1st Advantage Federal Credit Union to mail a check to Ace. KNIGHT deposited the check into Ace's bank account. No automobile was purchased with the loan proceeds.
- f. In or about May 2021, KNIGHT applied for an automobile loan application for a Ford truck VIN ending 5380 at First Tech Federal Credit Union using false employment and income information, causing First Tech Federal Credit Union to mail Ace a check for \$30,000, which KNIGHT deposited into Ace's bank account. No automobile was purchased with the loan proceeds.
- g. In or about August 2021, CC3 submitted a \$15,000 automobile loan application to Langley Federal Credit Union for an Infiniti VIN ending 1899 through Ace, causing Langley Federal Credit Union to mail the check to Ace. KNIGHT deposited the check in Ace's bank account. No automobile was purchased with the loan proceeds.
- h. In or about August 2021, CC3 submitted a \$30,000 automobile loan application to Atlantic Union Bank for a BMW VIN ending 2942 through Ace, causing Atlantic Union Bank to mail the check to Ace. KNIGHT deposited the check into Ace's bank account. No automobile was purchased with the loan proceeds.
- i. In or about August 2021, Co-Conspirator 5 ("CC5") submitted an automobile loan application with an Ace buyer's order for \$49,500 for a Land Rover, causing Navy Federal Credit Union to issue a \$49,500 check to CC5. KNIGHT

deposited the check into Ace's bank account. No automobile was purchased with the loan proceeds.

- j. In or about August 2021, CC5 submitted an automobile loan application with an Ace buyer's order for \$50,000 for a Porsche Macan VIN ending 1902, causing Chartway Federal Credit Union to mail a \$50,000 check to CC5. KNIGHT deposited the check into Ace's bank account. No automobile was purchased with the loan proceeds.
- k. In or about March 2022, CC3 submitted a \$26,000 automobile loan application with Call Credit Union through Ace, causing Call Credit Union to mail the check to Ace. KNIGHT deposited the check in Ace's bank account. No automobile was purchased with the loan proceeds.
- l. In or about March 2022, KNIGHT applied for a \$30,000 automobile loan with Redstone Federal Credit Union based on a Ford truck VIN ending 5830 using false employment and income information. KNIGHT caused a cashier's check to be sent to Ace. KNIGHT deposited the \$30,000 into Ace's bank account. No automobile was purchased with the loan proceeds.
- m. In or about September 2022, CC3 submitted a \$50,000 automobile loan application with USAA for a Mercedes Benz VIN ending 2957 through Saint, causing an ACH deposit from USAA to Saint's bank account for \$50,000. No automobile was purchased with the loan proceeds.
- n. In or about January 2023, KNIGHT obtained an automobile loan with Dollar Bank for \$32,000 for a Lexus VIN ending 5930 through Saint. Dollar Bank mailed a cashier's check to Saint, which was deposited into Saint's bank

account. CC1 then withdrew \$32,000 in cash from Saint's bank account in or about February 2022. No automobile was purchased with the loan proceeds.

19. In or about September 2022, KNIGHT obtained an automobile loan with Toyota Financial Services for \$164,904 for a Mercedes Benz G550 VIN ending 1286 through Priority Toyota. Toyota Financial Services wired \$164,904 to Priority Toyota in Chesapeake, Virginia causing Priority Toyota to wire \$96,449 to Fifth Third Bank in Cincinnati, Ohio, to pay off the outstanding lien. KNIGHT took possession of the Mercedes Benz.

20. In or about December 2022, KNIGHT sent a letter using the U.S. Mail to Experian to dispute the Toyota Financial Services loan, and other loans obtained in 2022, claiming loans were obtained by other individuals. KNIGHT included a Federal Trade Commission identity theft complaint and affidavit signed and sworn before a Notary Public that he knew contained false information.

21. Once the loans were processed and paid, KNIGHT and others known and unknown to the grand jury would dispute the loans with the credit bureaus, fraudulently contending that they did not request and obtain the loans.

(In violation of Title 18, United States Code, Sections 1349, 1341, 1343, and 1344.)

COUNTS TWO – FOUR**(Wire Fraud)**

22. The General Allegations and preceding allegations and statements contained in the entirety of this Indictment are realleged and incorporated as if set forth fully herein.

23. On or about the dates set forth below, in the Eastern District of Virginia and elsewhere, for the purpose of executing the above-described scheme and artifice to defraud and for obtaining money and property by means of materially false and fraudulent pretenses, representations, and promises, KNIGHT and others known and unknown, knowingly transmitted and caused to be transmitted by means of a wire communication in interstate and foreign commerce certain writings, signs, signals, pictures and sounds, and did aid and abet the same, as follows:

COUNT	DATE (ON OR ABOUT)	ITEM WIRED
2	May 28, 2021	Automobile loan application to First Tech Federal Credit Union.
3	March 18, 2022	Automobile loan application to Redstone Federal Credit Union.
4	January 31, 2023	Automobile loan application to Dollar Bank.

(In violation of Title 18, United States Code, Sections 1343 and 2).

COUNTS FIVE - NINE
(Bank Fraud)

24. The General Allegations and preceding allegations and statements contained in the entirety of this Indictment are realleged and incorporated as if set forth fully herein.

25. From in or about the dates and in the manner set forth below, in the Eastern District of Virginia and elsewhere, defendant ADRIAN KNIGHT, and others known and unknown, did knowingly and intentionally for the purpose of executing the described scheme and artifice to defraud and to obtain moneys, funds, credits, assets, securities and other property owned by and under the custody and control of the named financial institution, which qualify as a financial institution as defined under Title 18, United States Code, Section 20, executed each transaction described below by means of materially false and fraudulent pretenses, representations, and promises, and did aid and abet the same.

COUNT	DATE (ON OR ABOUT)	FINANCIAL INSTITUTION	DESCRIPTION/PURPOSE OF TRANSACTION
5	March 11, 2020	NAE Federal Credit Union	\$46,591 loan for a BMV VIN 0503
6	June 12, 2020	Chartway Federal Credit Union	\$59,581 loan for a BMW VIN 0503
7	June 12, 2020	Langley Federal Credit Union	\$69,997 loan for a Range Rover VIN 1060
8	January 28, 2021	Atlantic Union Bank	\$37,068 loan for a BMV VIN 7566
9	August 11, 2021	Navy Federal Credit Union	\$50,000 loan for Land Rover VIN 6305

(In violation of Title 18, United States Code, Sections 1344 and 2.)

COUNTS TEN - TWELVE
(Mail Fraud)

26. The General Allegations and preceding allegations and statements contained in the entirety of this Indictment are realleged and incorporated as if set forth fully herein.

27. On or about the dates set forth below, in the Eastern District of Virginia and elsewhere, for the purpose of executing the described scheme and artifice to defraud and for obtaining money and property by means of materially false and fraudulent presentences, representation and promises, and attempting to do so, the defendant ADRIAN KNIGHT knowingly caused to be delivered by U.S. mail and any private and commercial interstate carrier any matter and thing whatever according to the direction thereon, and at the place at which it was directed to be delivered by the person to whom it was addressed, the following matters, and aided and abetted the same:

COUNT	DATE (ON OR ABOUT)	ITEM MAILED
10	March 4, 2020	Cashier's check for \$69,234 from Atlantic Union Bank to KNIGHT
11	January 25, 2021	Check for \$30,000 from ABNB Federal Credit Union to KNIGHT.
12	December 27, 2022	Documents to Experian claiming identity theft

(In violation of Title 18, United States Code, Sections 1341 and 2.)

COUNT THIRTEEN
(Conspiracy to Launder Money Instruments)

28. The General Allegations and preceding allegations and statements contained in the entirety of this Indictment are realleged and incorporated as if set forth fully herein.

29. From in or about March 2019 to in or about January 2023, in the Eastern District of Virginia and elsewhere, defendant ADRIAN KNIGHT, and others known and unknown, knowingly and intentionally combined, conspired, confederated and agreed to commit the following offenses against the United States:

(a) Laundering of monetary instruments, that is, to knowingly conduct and attempt to conduct financial transactions affecting interstate and foreign commerce, which transactions involved the proceeds of specified unlawful activity, that is, mail, bank, and wire fraud, knowing that the transactions were designed in whole and in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, and that while conducting and attempting to conduct such financial transactions, knew that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i); and

(b) Laundering of monetary instruments, that is, to knowingly engage and attempt to engage, in monetary transactions by, through, and to a financial institution, affecting interstate and foreign commerce, in criminally derived property of a value greater than \$10,000, that is the deposit, withdrawal, and transfer of monetary instruments, such property having been derived from a specified unlawful activity, that is, mail, bank, and wire fraud, in violation of Title 18, United States Code, Section 1957.

THE PURPOSE OF THE CONSPIRACY

30. The purpose of the conspiracy was for ADRIAN KNIGHT and others to profit personally by obtaining money and property to which they were not entitled by receiving money from financial institutions based on falsified loan application documents.

THE WAYS, MANNER, AND MEANS OF CONSPIRACY

The ways, manner, and means by which KNIGHT and others sought to accomplish this conspiracy included, but were not limited to, the following:

31. KNIGHT and others known and unknown concealed the original and true source of fraudulently obtained funds by transferring and laundering those monies through financial accounts for Ace and Saint, getting cashiers' checks processed for conspirators, and having CC2 withdraw large sums of cash from Saint's bank account on his behalf.

32. KNIGHT and others known and unknown laundered funds to conceal those monies from law enforcement, credit bureaus, and financial institutions.

33. KNIGHT and others known and unknown transferred and laundered funds exceeding \$10,000 for personal profit and gain.

34. KNIGHT and others known and unknown would dispute the outstanding balances of their loan obligations with credit reporting agencies to have the obligations and balances removed in an effort to continue to be approved for additional loans and continue the scheme and artifice.

35. The ways, manner, and means that KNIGHT and others known and unknown used to accomplish the objective of the conspiracy included, but were not limited to, the following acts and transactions all originally derived from financial institutions following automobile loan applications:

DATE (ON OR ABOUT)	MONETARY/FINANCIAL TRANSACTION
June 28, 2022	CC1 made three withdrawals totaling \$25,000 from Saint's bank account.
July 17, 2022	CC2 made a \$40,000 withdrawal from Saint's bank account.
July 21, 2022	CC2 made a total of \$123,500 in withdrawals from Saint's bank account.
September 26, 2022	CC2 made \$34,000 in withdrawals from Saint's bank account.
September 29, 2022	Withdrawal from Truist of \$20,000 in the form of a cashier's check, which CC3 then deposited at Truist.

(In violation of Title 18, United States Code, Sections 1956(a)(1)(B)(i), 1956(h), and 1957.)

COUNTS FOURTEEN - NINETEEN
(Engaging in Unlawful Monetary Transactions)

36. The General Allegations and preceding allegations and statements contained in the entirety of this Indictment are realleged and incorporated as if set forth fully herein.

37. From in or about March 2019 to in or about January 2023, in the Eastern District of Virginia and elsewhere, defendant ADRIAN KNIGHT and others known and unknown knowingly engaged and attempted to engage in a monetary transaction by, through, and to a financial institution, affecting interstate and foreign commerce, in criminally derived property of a value greater than \$10,000, such funds having been derived from a specified unlawful activity, that is mail, bank, and wire fraud, in violation of Title 18, United States Code, Sections 1341, 1343, and 1344, and aided and abetted the same, as follows:

COUNT	DATE (ON OR ABOUT)	MONETARY/FINANCIAL TRANSACTION	UNLAWFUL ACTIVITY
14	June 12, 2020	Deposited Chartway Federal Credit Union cashier's check of \$59,581.50 into Ace's OPNB account.	Mail Fraud Bank Fraud Wire Fraud
15	June 12, 2020	Deposited Langley Federal Credit Union cashier's check of \$69,997.50 into Ace's OPNB account.	Mail Fraud Bank Fraud Wire Fraud
16	January 28, 2021	Deposited Atlantic Union Bank check of \$37,068.50 into Ace's Towne Bank account..	Mail Fraud Bank Fraud
17	May 28, 2021	Deposited First Tech Federal Credit Union check of \$30,000 into Ace's Towne Bank account.	Mail Fraud Wire Fraud
18	March 18, 2022	Deposited Redstone Federal Credit Union check of \$30,000 into Ace's Truist Bank Account.	Wire Fraud
19	January 31, 2023	Deposit of Dollar Bank check of \$32,000 into Saint Auto Sale's Towne Bank Account.	Mail Fraud <i>Wire fraud</i>

(In violation of Title 18, United States Code, Sections 1957 and 2.)

CL

CRIMINAL FORFEITURE

THE GRAND JURY FURTHER FINDS PROBABLE CAUSE THAT:

38. The defendant, if convicted of any of the violations alleged in Counts One through Twelve of this Indictment, shall forfeit to the United States, as part of sentencing pursuant to Federal Rule of Criminal Procedure 32.2, any property constituting, or derived from, proceeds obtained directly or indirectly, as the result of the violation.

39. The defendant, if convicted of either of the violations alleged in Counts Thirteen to and Nineteen of this Indictment, shall forfeit to the United States, as part of sentencing pursuant to Federal Rule of Criminal Procedure 32.2, any property, real or personal, involved in the violation, and any property traceable to such property.

40. If any property that is subject to forfeiture above is not available, it is the intention of the United States to seek an order forfeiting substitute assets pursuant to Title 21, United States Code, Section 853(p) and Federal Rule of Criminal Procedure 32.2(e.).

(In accordance with Title 18, United States Code, Sections 982(a)(1), 982(a)(2)(A), and 982(a)(3).)

United States of America v. ADRIAN KNIGHT
2:25-cr-46

Pursuant to the E-Government Act,
the original of this page has been filed
under seal in the Clerk's Office.

A TRUE BILL:

REDACTED COPY

FOREPERSON

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