

UNITED STATES DISTRICT COURT

for the

Western District of Michigan

FILED BY BM D.C.

Apr 1, 2025

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

United States of America

v.

25-MJ-2636-SANCHEZ

Case No. 1:25-cr-5

DANIELLE REGINA DIARBAKERLY

Honorable Paul L. Maloney

Defendant

U.S. District Court Judge

ARREST WARRANT

To: Any authorized law enforcement officer

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

(name of person to be arrested) DANIELLE REGINA DIARBAKERLY,  
who is accused of an offense or violation based on the following document filed with the court:

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

This offense is briefly described as follows:

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



Date: 01/15/2025

Deputy Clerk Sandra J. Anola

City and state: Grand Rapids, Michigan

Phillip J. Green, United States Magistrate Judge

Printed name and title

Return

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

Date: \_\_\_\_\_

Arresting officer's signature

Printed name and title

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

**25-MJ-2636-SANCHEZ**

VS.

DANIELLE REGINA DIARBAKERLY,

**INDICTMENT**

Defendant.

---

The Grand Jury charges:

(Money Laundering Conspiracy)

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

DANIELLE REGINA DIARBAKERLY

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

### **Object of the Conspiracy**

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

### **Means and Methods**

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

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

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

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

18 U.S.C. § 1956(h)

18 U.S.C. § 1956(a)(1)(B)(i)

18 U.S.C. § 1341

18 U.S.C. § 1343

FORFEITURE ALLEGATION  
(Money Laundering)

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

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

DANIELLE REGINA DIARBAKERLY,

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

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

2. SUBSTITUTE ASSETS: If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to 21 U.S.C. § 853(p) as incorporated by 18 U.S.C. § 982(b).

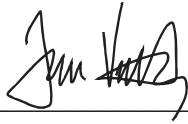
18 U.S.C. § 982(a)(1)  
21 U.S.C. § 853(p)  
18 U.S.C. § 982(b)  
18 U.S.C. § 1956

A TRUE BILL

[ /s/ Redacted ]

MARK A. TOTTEN  
United States Attorney

GRAND JURY FOREPERSON



TIMOTHY VERHEY  
Assistant United States Attorney

Revised 03/2025

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

APPEARANCE BOND: \_\_\_\_\_

CASE NO.: 25-MJ-2536

UNITED STATES OF AMERICA:

Plaintiff,

v.

USM #: 70295-511

Defendant,

Danielle Regina Diarbakerly

I, the undersigned defendant and I or we, the undersigned sureties, jointly and severally acknowledge that we and our personal representatives, jointly and severally, are bound to pay the United States of America, the sum of  
\$ 250,000 personal Surety Bond

**STANDARD CONDITIONS OF BOND**

**The conditions of this bond are that the defendant:**

1. Shall appear before this Court and at such other places as the defendant may be required to appear, in accordance with any and all orders and directions relating to the defendant's appearance in this case, including appearance for violation of a condition of the defendant's release as may be ordered or notified by this Court or any other United States District Court to which the defendant may be held to answer or the cause transferred. The defendant is required to ascertain from the Clerk of Court or defense counsel the time and place of all scheduled proceedings on the case. In no event may a defendant assume that his or her case has been dismissed unless the Court has entered an order of dismissal. The defendant is to abide by any judgment entered in such matter by surrendering to serve any sentence imposed and obeying any order or direction in connection with such judgment. This is a continuing bond, including any proceeding on appeal or review, which shall remain in full force and effect until such time as the Court shall order otherwise.
2. May not travel outside the Southern District of Florida unless otherwise approved by the Court prior to any such travel. The Southern District of Florida consists of the following counties: Broward, Highlands, Indian River, Martin, Miami-Dade, Monroe, Okeechobee, Palm Beach and St. Lucie.
3. May not change his/her present address without prior notification and approval from the U.S. Probation Officer or the Court.
4. Must cooperate with law enforcement officers in the collection of a DNA sample if the collection is required by 42 U.S.C. Section 14135a.
5. Must not violate any federal, state or local law while on release in this case. Should the defendant come in contact with law enforcement he/she shall notify the U.S. Probation Officer within 72 hours.

DEFENDANT: Danielle Diarbakerly  
CASE NUMBER: 25-MJ-2536  
PAGE TWO

**SPECIAL CONDITIONS OF BOND**

In addition to compliance with the previously stated conditions of bond, the defendant must comply with the special conditions checked below:

- ☒ a. Surrender all passports and travel documents, if any, to Pretrial Services and not obtain any travel documents during the pendency of the case;
- ☒ b. Report to Pretrial Services as follows: ( ☒ ) as directed or \_\_\_ time(s) a week in person and \_\_\_ time(s) a week by telephone;
- ☐ c. Submit to substance abuse testing and/or treatment, contribute to the cost of services rendered based on ability to pay, as determined by the U.S. Probation Officer;
- ☐ d. Refrain from \_\_\_ excessive OR \_\_\_ abstain from alcohol use or any use of a narcotic drug or other controlled substance, as defined in section 102 of the Controlled Substances Act (21 U.S.C. § 802), without a prescription by a licensed medical practitioner;
- ☐ e. Participate in a mental health assessment and/or treatment and contribute to the costs of services rendered based on ability to pay, as determined by the U.S. Probation Officer;
- ☐ f. Employment restriction(s): \_\_\_\_\_
- ☐ g. Maintain or actively seek full-time employment;
- ☐ h. Maintain or begin an educational program;
- ☐ i. Avoid all contact with victims or witnesses to the crimes charged, except through counsel. The AUSA shall provide defense counsel and pretrial services with the names of all victims or witnesses. The prohibition against contact does not take effect until defense counsel receives the list. The prohibition against contact applies only to those persons on the list, but the prosecutor may expand the list by sending written notice to defense counsel and pretrial services.;
- ☐ j. Avoid all contact with co-defendants and defendants in related cases, except through counsel;
- ☐ k. Refrain from possessing a firearm, destructive device or other dangerous weapons and shall surrender (if any), their concealed weapons permit to the U.S. Probation Office;
- ☐ l. None of the signatories may sell, pledge, mortgage, hypothecate, encumber, etc., any real property they own, until the bond is discharged, or otherwise modified by the Court;
- ☐ m. May not visit commercial transportation establishment: airports, seaport/marinas, commercial bus terminals, train stations, etc.;
- ☐ n. Defendant shall consent to the U.S. Probation Officer conducting periodic unannounced examinations of the defendant's computer equipment at his/her place of employment or on the computer at his/her residence which may include retrieval and copying of all data from the computer(s) and any internal or external peripherals to ensure compliance with this condition and/or removal of such equipment for the purpose of conducting a more thorough inspection; and consent at the direction of the U.S. Probation Officer to have installed on the defendant's computer(s), at the defendant's expense, any hardware or software systems to monitor the defendant's computer use;



DEFENDANT: Danielle Diarbakerly  
CASE NUMBER: 25-mj-2536  
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\_\_\_ o. **LOCATION MONITORING PROGRAM:** The defendant shall participate in the location monitoring program and comply with the requirements, as directed in subsections i, ii, and iii.

i) Following the location restriction component (**check one**):

- \_\_\_ (1) **Curfew.** You are restricted to your residence every day ( ) from \_\_\_\_\_ to \_\_\_\_\_, or ( ) as directed by the supervising officer; or
- \_\_\_ (2) **Home Detention.** You are restricted to your residence at all times except employment; education; religious services; medical, substance use, or mental health treatment; attorney visits; court appearances; court-ordered obligations; activities approved by the court; or essential activities approved in advance by the supervising officer; or
- \_\_\_ (3) **Home Incarceration.** You are restricted to 24-hour-a-day lockdown at your residence except for medical necessities and court appearances or activities specifically approved by the court.
- \_\_\_ (4) **Stand-Alone Monitoring.** You have no residential component (curfew, home detention, or home incarceration) restriction. However, you must comply with the location or travel restrictions as imposed by the court. **Note:** Stand-alone monitoring should be used in conjunction with global positioning system (GPS) or virtual mobile application technology.

ii) Submit to the following location monitoring technology (**check one**):

- \_\_\_ (1) Location monitoring technology as directed by the supervising officer; or
- \_\_\_ (2) GPS; or
- \_\_\_ (3) Radio Frequency; or
- \_\_\_ (4) Voice Recognition; or
- \_\_\_ (5) Virtual Mobile Application. You must allow pretrial services or supervising officer to conduct initial and periodic inspection of the mobile device and mobile application to verify that 1) the monitoring software is functional, 2) the required configurations (e.g., location services) are unaltered, and 3) no efforts have been made to alter the mobile application.

iii) ( ) pay all or part of the cost of the location monitoring, including equipment loss or damage, based upon your ability to pay, as determined by the supervising officer.

\_\_\_ p. **RESIDENTIAL RE-ENTRY CENTER:** The defendant shall reside at a residential re-entry center or halfway house and abide by all the rules and regulations of the program. The cost to be paid by ( ) Pretrial Services or ( ) based on the defendant's ability to pay. You are restricted to the residential re-entry center/halfway house at all times except for:

- ( ) employment
- ( ) education
- ( ) religious services
- ( ) medical, substance abuse, or mental health treatment
- ( ) attorney visits
- ( ) court appearances
- ( ) court ordered obligations
- ( ) reporting to Pretrial Services
- ( ) other \_\_\_\_\_

DEFENDANT: Danielle Diarbakenly  
CASE NUMBER: 25-MJ-2536  
PAGE FOUR

q. Third-Party Custody: \_\_\_\_\_ will serve as a third-party custodian and will report any violations of the release conditions to the U.S. Probation Officer. Failure to comply with these requirements, the third-party custodian can be subject to the provisions of 18 U.S.C. § 401, Contempt of Court.

r. The defendant shall submit his person, property, residence, vehicle, papers, computers, (as defined in 18 U.S.C. 1030(e)(1)), other electronic communication or data storage devices or media, or office, to a search conducted by a United States Probation Officer. The defendant must warn any other occupants that the premises may be subject to searches pursuant to this condition. Any search must be conducted at a reasonable time and in a reasonable manner.

s. **Mandatory Adam Walsh Conditions:** Defendant shall abide by specified restrictions on personal associations, place of abode, or travel, to avoid all contact with an alleged victim of the crime and with a potential witness who may testify concerning the offense; report on a regular basis to a designated law enforcement agency, pretrial services agency or other agency; comply with a specified curfew (with electronic monitoring) and refrain from possessing a firearm, destructive device or other dangerous weapons.

t. Additional Sex Offense Conditions for Defendants Charged or Convicted of a Sexual Offense:

1. ( ) Defendant may not have contact with victim(s), or any child under the age of 18, unless approved by the Court or allowed by the U.S. Probation Officer.
2. ( ) The defendant shall not possess or use any data encryption technique or program and shall provide passwords and administrative rights to the U.S. Probation Officer.
3. ( ) Defendant shall participate in specialized sex offender evaluation and treatment, if necessary, and to contribute to the costs of services rendered based on ability to pay, as determined by the U.S. Probation Office.
4. ( ) Defendant shall not possess, procure, purchase or otherwise obtain any internet capable device and/or computer. Additionally, the defendant is prohibited from using another individual's computer or device that has internet capability.
5. ( ) Defendant is prohibited from establishing or maintaining any email account or social media account. Additionally, the defendant is prohibited from using another individual's email account or social media account. Must provide monthly or upon request, personal phone and credit card billings to Pretrial Services to confirm there are no services with any internet services provider.
6. ( ) Defendant is not permitted to enter places where children congregate including, but not limited to any play areas, playgrounds, libraries, children-themed restaurants, daycares, schools, amusement parks, carnivals/fairs, unless approved by the U.S. Probation Officer.
7. ( ) The defendant shall not be involved in any children's or youth organizations.
8. ( ) Defendant is prohibited from viewing, owning, or possessing any obscene, pornographic, or sexually stimulating visual or auditory material, including telephone, electronic media, computer programs, or computer services.
9. ( ) The defendant shall participate in a maintenance polygraph examination to periodically investigate the defendant's compliance. The polygraph examination shall specifically address only defendant's compliance or non-compliance with the special conditions of release and shall not inquire into the facts of the pending criminal case against defendant. The defendant will contribute to the costs of services rendered (co-payment) based on ability to pay or availability of third party payment.

✓ u. May travel to and from: MDFL & WD Michigan and must notify Pretrial Services of travel plans before leaving and upon return. (Reside) (Court)

✓ v. Comply with the following additional conditions of bond: Def. will reside at address in Naples  
9433 Lagomare Court,  
Naples, FL

DEFENDANT: Danielle Diarbakerly  
CASE NUMBER: 25-MJ-2536  
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**PENALTIES AND SANCTIONS APPLICABLE TO DEFENDANT**

Violation of any of the foregoing conditions of release may result in the immediate issuance of a warrant for the defendant's arrest, a revocation of release, and order of detention, as provided in 18 U.S.C. §3148, forfeiture of any bail posted, and a prosecution for contempt as provided in 18 U.S.C. §401, which could result in a possible term of imprisonment or a fine.

The commission of any offense while on pretrial release may result in an additional sentence upon conviction for such offense to a term of imprisonment of not more than ten years, if the offense is a felony; or a term of imprisonment of not more than one year, if the offense is a misdemeanor. This sentence shall be consecutive to any other sentence and must be imposed in addition to the sentence received for the offense itself.

Title 18 U.S.C. §1503 makes it a felony criminal offense punishable by imprisonment and a \$250,000 fine to intimidate or attempt to intimidate a witness, juror or officer of the court; 18 U.S.C. §1510 makes it a felony criminal offense punishable by imprisonment and a \$250,000 fine to obstruct a criminal investigation; 18 U.S.C. §1512 makes it a felony criminal offense punishable by imprisonment and a \$250,000 fine to tamper with a witness, victim or informant; and 18 U.S.C. §1513 makes it a felony criminal offense punishable by imprisonment and a \$250,000 fine to retaliate against a witness, victim or informant, or threaten to do so.

It is a criminal offense under 18 U.S.C. §3146, if after having been released, the defendant knowingly fails to appear as required by the conditions of release, or to surrender for the service of sentence pursuant to a court order. If the defendant was released in connection with a charge of, or while awaiting sentence, surrender for the service of a sentence, or appeal or certiorari after conviction for:

- (1) an offense punishable by death, life imprisonment, or imprisonment for a term of fifteen years or more the defendant shall be fined not more than \$250,000 or imprisoned for not more than ten years, or both;
- (2) an offense punishable by imprisonment for a term of five years or more, but less than fifteen years, the defendant shall be fined not more than \$250,000 or imprisoned for not more than five years, or both;
- (3) any other felony, the defendant shall be fined not more than \$250,000 or imprisoned not more than two years, or both;
- (4) a misdemeanor, the defendant shall be fined not more than \$100,000 or imprisoned not more than one year, or both.

A term of imprisonment imposed for failure to appear or surrender shall be consecutive to the sentence of imprisonment for any other offense. In addition, a failure to appear may result in the forfeiture of any bail posted, which means that the defendant will be obligated to pay the full amount of the bond, which may be enforced by all applicable laws of the United States.

DEFENDANT: Danielle Diarbakorly  
CASE NUMBER: 25-mj-2536  
PAGE SIX

**PENALTIES AND SANCTIONS APPLICABLE TO SURETIES**

Violation by the defendant of any of the foregoing conditions of release will result in an immediate obligation by the surety or sureties to pay the full amount of the bond. Forfeiture of the bond for any breach of one or more conditions may be declared by a judicial officer of any United States District Court having cognizance of the above entitled matter at the time of such breach, and if the bond is forfeited and the forfeiture is not set aside or remitted, judgment may be entered upon motion in such United States District Court against each surety jointly and severally for the amount of the bond, together with interest and costs, and execution may be issued and payment secured as provided by the Federal Rules of Criminal Procedure and other laws of the United States.

**SIGNATURES**

I have carefully read and I understand this entire appearance bond consisting of seven pages, or it has been read to me, and, if necessary, translated into my native language, and I know that I am obligated by law to comply with all of the terms of this bond. I promise to obey all conditions of this bond, to appear in court as required, and to surrender for service of any sentence imposed. I am aware of the penalties and sanctions outlined in this bond for violations of the terms of the bond.

If I am an agent acting for or on behalf of a corporate surety, I further represent that I am a duly authorized agent for the corporate surety and have full power to execute this bond in the amount stated.

**DEFENDANT**

Signed this 1st day of April, 2025 at Miami, Florida

Signed and acknowledged before me

DEFENDANT: (Signature) DRD

WITNESS: Ismael

Naples

Miami

FL

City

State

City

State

**CORPORATE SURETY**

Signed this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_ at \_\_\_\_\_, Florida

SURETY: \_\_\_\_\_

AGENT: (Signature) \_\_\_\_\_

PRINT NAME: \_\_\_\_\_

City

State

**INDIVIDUAL SURETIES**

Signed this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_ at \_\_\_\_\_, Florida

SURETY: (Signature) \_\_\_\_\_

PRINT NAME: \_\_\_\_\_

RELATIONSHIP TO DEFENDANT: \_\_\_\_\_

City

State

Signed this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_ at \_\_\_\_\_, Florida

SURETY: (Signature) \_\_\_\_\_

PRINT NAME: \_\_\_\_\_

RELATIONSHIP TO DEFENDANT: \_\_\_\_\_

City

State

Signed this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_ at \_\_\_\_\_, Florida

SURETY: (Signature) \_\_\_\_\_

PRINT NAME: \_\_\_\_\_

RELATIONSHIP TO DEFENDANT: \_\_\_\_\_

City

State

Signed this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_ at \_\_\_\_\_, Florida

SURETY: (Signature) \_\_\_\_\_

PRINT NAME: \_\_\_\_\_

RELATIONSHIP TO DEFENDANT: \_\_\_\_\_

City

State

**APPROVAL BY THE COURT**

Date: APRIL 2, 2025

Eduardo I. Sanchez

EDUARDO I. SANCHEZ  
UNITED STATES MAGISTRATE JUDGE

## MINUTE ORDER

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## Magistrate Judge Eduardo I. Sanchez

Atkins Building Courthouse - 6th Floor

Date: 4/1/25

Time: 2:00 p.m.

Defendant: Danielle Regina Diarbakerly J#: 70295-511 Case #: 25-MJ-2636-SANCHEZ(SEALED) unsealedAUSA: Dan Rosenfeld Attorney: Sogol Ghomeshi - AFPOViolation: WD MI/WARR/IND/ Money Laundering ConspiracySurr/Arrest Date: 04/01/25 YOB: 1987Proceeding: Initial Appearance

CJA Appt: \_\_\_\_\_

Bond/PTD Held: Yes No Recommended Bond: \_\_\_\_\_Bond Set at: STIP- \$250K PSB

Co-signed by: \_\_\_\_\_

☒ Surrender and/or do not obtain passports/travel docsLanguage: English☒ Report to PTS as directed/or \_\_\_\_\_ x's a week/month by phone: \_\_\_\_\_ x's a week/month in person

Disposition:

Random urine testing by Pretrial

☐ Services

Treatment as deemed necessary

☐ Refrain from excessive use of alcohol☐ Participate in mental health assessment & treatment☐ Maintain or seek full-time employment/education☐ No contact with victims/witnesses, except through counsel☐ No firearms☐ Not to encumber property☐ May not visit transportation establishments☐ Home Confinement/Electronic Monitoring and/or

Curfew \_\_\_\_\_ pm to \_\_\_\_\_ am, paid by \_\_\_\_\_

☐ Allowances: Medical needs, court appearances, attorney visits, religious, employment☒ Travel extended to: and from: MD-FR & WD-Michigan (Reside) (Court)☒ Other: Dett will reside at address in paper stated on the arrest☒ Grants one term request to Unseal the Indictment Granted

- Dett. advised of rights and charges; Dett. sworn

☒ Dett. one term request for Court Appointed Counsel Granted - AFPO is appointed.

- Patches stipulated to \$250K PSB w/conditions; Dett. Released

- Dett. executed waiver of Identity &amp; Removal Hearings

- Dett. advised of 11/14 hearing in Michigan

Dett. Ordered Removed to the WD of Michigan

NEXT COURT APPEARANCE

Date:

Time:

Judge:

- Brady Order Given

Report RE Counsel: \_\_\_\_\_

PTD/Bond Hearing: \_\_\_\_\_

Prelim/Arraign or Removal: \_\_\_\_\_

Status Conference RE: \_\_\_\_\_

D.A.R. 14:29:33; 15:33:28

Time in Court: \_\_\_\_\_

18 minutes

s/Eduardo I. Sanchez

Magistrate Judge

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 25-MJ-2636-SANCHEZ

UNITED STATES OF AMERICA,

Plaintiff,

v.

DANIELLE REGINA DIARBAKERLY,

Defendant.

\_\_\_\_\_ /

**DEFENDANT'S INVOCATION OF  
RIGHTS TO SILENCE AND COUNSEL**

The defendant named above does hereby invoke his rights to remain silent and to counsel with respect to any and all questioning or interrogation, regardless of the subject matter, including, but not limited to: matters that may bear on or relate to arrest, searches and seizures, bail, pretrial release or detention, evidence at trial, guilt or innocence, forfeitures; or that may be relevant to sentencing, enhanced punishments, factors applicable under the U.S. Sentencing Guidelines, restitution, immigration status or consequences resulting from arrest or conviction; appeals or other post-trial proceedings.



The Defendant requests that the United States Attorney ensure that this invocation of rights is honored, by forwarding a copy of it to all law enforcement agents, government officials, or employees associated with the investigation of any matters relating to the defendant. Any contact with the Defendant must be made through the defendant's lawyer, undersigned counsel.

Respectfully Submitted,

HECTOR A. DOCPICO  
FEDERAL PUBLIC DEFENDER

By: s/ Sogol Ghomeshi  
Sogol Ghomeshi  
Assistant Federal Public Defender  
Florida Bar No.: 1002979  
150 W. Flagler Street, Suite 1700  
Miami, Florida 33130-1556  
Tel: (305) 533-4255  
Email: [sogol\\_ghomeshi@fd.org](mailto:sogol_ghomeshi@fd.org)

**CERTIFICATE OF SERVICE**

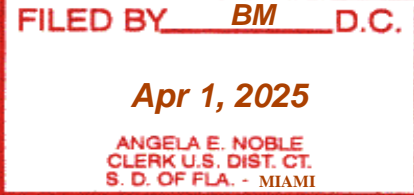
I HEREBY certify that on **April 2, 2025**, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those counsel or parties who are not authorized to receive electronically Notices of Electronic Filing.

By: s/ Sogol Ghomeshi  
Sogol Ghomeshi, AFD

UNITED STATES DISTRICT COURT

for the

Western District of Michigan



United States of America  
v.

DANIELLE REGINA DIARBAKERLY

*Defendant*

) 25-MJ-2636-SANCHEZ  
)  
)  
)  
)  
)

Case No. 1:25-cr-5

Honorable Paul L. Maloney

U.S. District Court Judge

ARREST WARRANT

To: Any authorized law enforcement officer

**YOU ARE COMMANDED** to arrest and bring before a United States magistrate judge without unnecessary delay  
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who is accused of an offense or violation based on the following document filed with the court:

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This offense is briefly described as follows:

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



Date: 01/15/2025

Deputy Clerk \_\_\_\_\_

City and state: Grand Rapids, Michigan

Phillip J. Green, United States Magistrate Judge

*Printed name and title*

Return

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

Date: \_\_\_\_\_

\_\_\_\_\_  
*Arresting officer's signature*

\_\_\_\_\_  
*Printed name and title*





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

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

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

18 U.S.C. § 1956(h)

18 U.S.C. § 1956(a)(1)(B)(i)

18 U.S.C. § 1341

18 U.S.C. § 1343

FORFEITURE ALLEGATION  
(Money Laundering)

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

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

DANIELLE REGINA DIARBAKERLY,

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

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

2. SUBSTITUTE ASSETS: If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to 21 U.S.C. § 853(p) as incorporated by 18 U.S.C. § 982(b).

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

A TRUE BILL

[ /s/ Redacted ]

MARK A. TOTTEN  
United States Attorney

---

GRAND JURY FOREPERSON

  
\_\_\_\_\_  
TIMOTHY VERHEY  
Assistant United States Attorney

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
MIAMI DIVISION

Case No. 25-MJ-2536-SANCHEZ(SEALED)

UNITED STATES OF AMERICA,  
Plaintiff,

V.


Danielle Regina Diarbakerly,  
Defendant(s).  
\_\_\_\_\_

**ORDER**

**THIS CAUSE** came before the Court and pursuant to proceedings it is thereupon, PURSUANT TO THE ARREST OF THE ABOVE NAMED DEFENDANT, THIS CASE IS HEREBY UNSEALED.

**DONE AND ORDERED** at Miami, Florida.

Dated: 4/1/25

  
\_\_\_\_\_  
Eduardo I. Sanchez  
UNITED STATES MAGISTRATE JUDGE

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 25-MJ-2636-SANCHEZ

UNITED STATES OF AMERICA,

Plaintiff,

v.

DANIELLE REGINA DIARBAKERLY,

Defendant.

\_\_\_\_\_ /

**DEFENDANT'S INVOCATION OF  
RIGHTS TO SILENCE AND COUNSEL**

The defendant named above does hereby invoke his rights to remain silent and to counsel with respect to any and all questioning or interrogation, regardless of the subject matter, including, but not limited to: matters that may bear on or relate to arrest, searches and seizures, bail, pretrial release or detention, evidence at trial, guilt or innocence, forfeitures; or that may be relevant to sentencing, enhanced punishments, factors applicable under the U.S. Sentencing Guidelines, restitution, immigration status or consequences resulting from arrest or conviction; appeals or other post-trial proceedings.

The Defendant requests that the United States Attorney ensure that this invocation of rights is honored, by forwarding a copy of it to all law enforcement agents, government officials, or employees associated with the investigation of any matters relating to the defendant. Any contact with the Defendant must be made through the defendant's lawyer, undersigned counsel.

Respectfully Submitted,

HECTOR A. DOCPICO  
FEDERAL PUBLIC DEFENDER

By: s/ Sogol Ghomeshi  
Sogol Ghomeshi  
Assistant Federal Public Defender  
Florida Bar No.: 1002979  
150 W. Flagler Street, Suite 1700  
Miami, Florida 33130-1556  
Tel: (305) 533-4255  
Email: [sogol\\_ghomeshi@fd.org](mailto:sogol_ghomeshi@fd.org)

**CERTIFICATE OF SERVICE**

I HEREBY certify that on **April 2, 2025**, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those counsel or parties who are not authorized to receive electronically Notices of Electronic Filing.

By: s/ Sogol Ghomeshi  
Sogol Ghomeshi, AFD



## MINUTE ORDER

Page 9

## Magistrate Judge Eduardo I. Sanchez

Atkins Building Courthouse - 6th Floor

Date: 4/1/25

Time: 2:00 p.m.

Defendant: Danielle Regina Diarbakerly J#: 70295-511 Case #: 25-MJ-2636-SANCHEZ(SEALED) unsealedAUSA: Dan Rosenfeld Attorney: Sogol Ghomeshi - AFPOViolation: WD MI/WARR/IND/ Money Laundering Conspiracy Surr/Arrest Date: 04/01/25 YOB: 1987Proceeding: Initial Appearance

CJA Appt: \_\_\_\_\_

Bond/PTD Held: Yes No Recommended Bond: \_\_\_\_\_Bond Set at: STIP- \$250K PSB

Co-signed by: \_\_\_\_\_

☒ Surrender and/or do not obtain passports/travel docsLanguage: English☒ Report to PTS as directed/or \_\_\_\_\_ x's a week/month by phone: \_\_\_\_\_ x's a week/month in person

Random urine testing by Pretrial

☐ Services

Treatment as deemed necessary

☐ Refrain from excessive use of alcohol☐ Participate in mental health assessment & treatment☐ Maintain or seek full-time employment/education☐ No contact with victims/witnesses, except through counsel☐ No firearms☐ Not to encumber property☐ May not visit transportation establishments☐ Home Confinement/Electronic Monitoring and/or

Curfew \_\_\_\_\_ pm to \_\_\_\_\_ am, paid by \_\_\_\_\_

☐ Allowances: Medical needs, court appearances, attorney visits, religious, employment☒ Travel extended to: and from: MD-FR & WD-Michigan (Reside) (Court)☒ Other: Dett will reside at address in paper stated on the arrest

Disposition:

☒ Grants one term request to Unseal the Indictment Granted

- Dett. advised of rights and charges; Dett. sworn

☒ Dett. one term request for Court Appointed Counsel Granted - AFPO is appointed.

- Patches stipulated to \$250K PSB w/conditions; Dett. Released

- Dett. executed waiver of Identity &amp; Removal Hearings

- Dett. advised of 11/14 hearing in Michigan

Dett. Ordered Removed to the WD of Michigan

NEXT COURT APPEARANCE

Date:

Time:

Judge:

- Brady Order Given

Report RE Counsel: \_\_\_\_\_

PTD/Bond Hearing: \_\_\_\_\_

Prelim/Arraign or Removal: \_\_\_\_\_

Status Conference RE: \_\_\_\_\_

D.A.R. 14:29:33; 15:33:28

Time in Court: \_\_\_\_\_

18 minutes

s/Eduardo I. Sanchez

Magistrate Judge

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

Case No: 25-MJ-2536

United States of America  
Plaintiff,

v.

Charging District's Case No. 25-CR-00005-PLM

Danielle Regina Dialbakerly  
Defendant.

WAIVER OF RULE 5 & 5.1 REMOVAL/IDENTITY HEARINGS

I understand that I have been charged in another district, the Western District of Michigan.

I have been informed of the charges and of my rights to:


- (1) retain counsel or request the assignment of counsel if I am unable to retain counsel;
- (2) an identity hearing to determine whether I am the person named in the charges;
- (3) production of the warrant, a certified copy of the warrant, or a reliable electronic copy of either;
- (4) a preliminary hearing within 14 days of my first appearance if I am in custody and 21 days otherwise — unless I am indicted — to determine whether there is probable cause to believe that an offense has been committed;
- (5) a hearing on any motion by the government for detention;
- (6) request transfer of the proceedings to this district under Fed. R. Crim. P. 20, to plead guilty.


I agree to waive my rights to: (check those that apply)

- ☒ An identity hearing and production of the warrant.
- ☐ A preliminary hearing.
- ☐ A detention hearing in the Southern District of Florida.
- ☐ An identity hearing, production of the warrant, and any preliminary or detention hearing to which I may be entitled to in this district. I request that those hearings be held in the prosecuting district, at a time set by that court.

I consent to the issuance of an order requiring my appearance in the prosecuting district where the charges are pending against me.

Date:

  
Defendant's Signature

  
EDUARDO I. SANCHEZ  
UNITED STATES MAGISTRATE JUDGE

**SOUTHERN DISTRICT OF FLORIDA**  
Case No. 25-MJ-2636-SANCHEZ(SEALED)

United States of America  
Plaintiff,

v.

Charging District's Case No. 25-CR-5

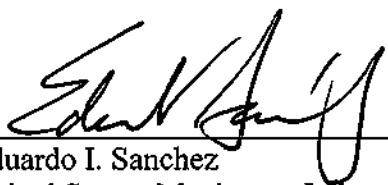
Danielle Regina Diarbakerly,  
Defendant.

**ORDER OF REMOVAL**

It appearing that in the **Western District Of Michigan**, an Indictment was filed against the above-named defendant on a charge of **WD MI/WARR/IND/ Money Laundering Conspiracy**, and that the defendant was arrested in the Southern District of Florida and was given a hearing before United States Magistrate Judge Eduardo I. Sanchez at Miami, Florida, which officially committed the defendant for removal to the **Western District Of Michigan**, it is ORDERED AND ADJUDGED that the defendant be removed to the above-named district for trial on said charge.

And it further appearing that the defendant waived further hearing in the said removal proceedings and was held by the Magistrate Judge Eduardo I. Sanchez for removal and posted bail in the amount of \$ 250K PSB which was approved by the United States Magistrate Judge Eduardo I. Sanchez, and it is further ORDERED that the defendant shall appear in the aforesaid district at such times and places as may be ordered by that District Court, in accordance with the terms and conditions of aforesaid bond furnished by the defendant, and it is further ORDERED that the funds, plus interest, which may have been deposited on behalf of this defendant with the Clerk of the Court under Bail Reform Act be transferred to the district where removed.

DONE AND ORDERED at Miami, Florida on 4/1/25.

  
\_\_\_\_\_  
Eduardo I. Sanchez  
United States Magistrate Judge

Revised 03/2025

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

APPEARANCE BOND: \_\_\_\_\_

CASE NO.: 25-MJ-2536

UNITED STATES OF AMERICA:

Plaintiff,

v.

USM #: 70295-511

Defendant,

Danielle Regina Diarbakerly

I, the undersigned defendant and I or we, the undersigned sureties, jointly and severally acknowledge that we and our personal representatives, jointly and severally, are bound to pay the United States of America, the sum of \$ 250,000 personal Surety Bond

**STANDARD CONDITIONS OF BOND**

**The conditions of this bond are that the defendant:**

1. Shall appear before this Court and at such other places as the defendant may be required to appear, in accordance with any and all orders and directions relating to the defendant's appearance in this case, including appearance for violation of a condition of the defendant's release as may be ordered or notified by this Court or any other United States District Court to which the defendant may be held to answer or the cause transferred. The defendant is required to ascertain from the Clerk of Court or defense counsel the time and place of all scheduled proceedings on the case. In no event may a defendant assume that his or her case has been dismissed unless the Court has entered an order of dismissal. The defendant is to abide by any judgment entered in such matter by surrendering to serve any sentence imposed and obeying any order or direction in connection with such judgment. This is a continuing bond, including any proceeding on appeal or review, which shall remain in full force and effect until such time as the Court shall order otherwise.

2. May not travel outside the Southern District of Florida unless otherwise approved by the Court prior to any such travel. The Southern District of Florida consists of the following counties: Broward, Highlands, Indian River, Martin, Miami-Dade, Monroe, Okeechobee, Palm Beach and St. Lucie.

3. May not change his/her present address without prior notification and approval from the U.S. Probation Officer or the Court.

4. Must cooperate with law enforcement officers in the collection of a DNA sample if the collection is required by 42 U.S.C. Section 14135a.

5. Must not violate any federal, state or local law while on release in this case. Should the defendant come in contact with law enforcement he/she shall notify the U.S. Probation Officer within 72 hours.

DEFENDANT: Danielle Diarbakerly  
CASE NUMBER: 25-MJ-2536  
PAGE TWO

**SPECIAL CONDITIONS OF BOND**

In addition to compliance with the previously stated conditions of bond, the defendant must comply with the special conditions checked below:

- ☒ a. Surrender all passports and travel documents, if any, to Pretrial Services and not obtain any travel documents during the pendency of the case;
- ☒ b. Report to Pretrial Services as follows: ( ☒ ) as directed or \_\_\_ time(s) a week in person and \_\_\_ time(s) a week by telephone;
- \_\_\_ c. Submit to substance abuse testing and/or treatment, contribute to the cost of services rendered based on ability to pay, as determined by the U.S. Probation Officer;
- \_\_\_ d. Refrain from \_\_\_ excessive OR \_\_\_ abstain from alcohol use or any use of a narcotic drug or other controlled substance, as defined in section 102 of the Controlled Substances Act (21 U.S.C. § 802), without a prescription by a licensed medical practitioner;
- \_\_\_ e. Participate in a mental health assessment and/or treatment and contribute to the costs of services rendered based on ability to pay, as determined by the U.S. Probation Officer;
- \_\_\_ f. Employment restriction(s): \_\_\_\_\_
- \_\_\_ g. Maintain or actively seek full-time employment;
- \_\_\_ h. Maintain or begin an educational program;
- \_\_\_ i. Avoid all contact with victims or witnesses to the crimes charged, except through counsel. The AUSA shall provide defense counsel and pretrial services with the names of all victims or witnesses. The prohibition against contact does not take effect until defense counsel receives the list. The prohibition against contact applies only to those persons on the list, but the prosecutor may expand the list by sending written notice to defense counsel and pretrial services.;
- \_\_\_ j. Avoid all contact with co-defendants and defendants in related cases, except through counsel;
- \_\_\_ k. Refrain from possessing a firearm, destructive device or other dangerous weapons and shall surrender (if any), their concealed weapons permit to the U.S. Probation Office;
- \_\_\_ l. None of the signatories may sell, pledge, mortgage, hypothecate, encumber, etc., any real property they own, until the bond is discharged, or otherwise modified by the Court;
- \_\_\_ m. May not visit commercial transportation establishment: airports, seaport/marinas, commercial bus terminals, train stations, etc.;
- \_\_\_ n. Defendant shall consent to the U.S. Probation Officer conducting periodic unannounced examinations of the defendant's computer equipment at his/her place of employment or on the computer at his/her residence which may include retrieval and copying of all data from the computer(s) and any internal or external peripherals to ensure compliance with this condition and/or removal of such equipment for the purpose of conducting a more thorough inspection; and consent at the direction of the U.S. Probation Officer to have installed on the defendant's computer(s), at the defendant's expense, any hardware or software systems to monitor the defendant's computer use;

DEFENDANT: Danielle Diarbakerly  
CASE NUMBER: 25-mj-2536  
PAGE THREE

\_\_\_ o. **LOCATION MONITORING PROGRAM:** The defendant shall participate in the location monitoring program and comply with the requirements, as directed in subsections i, ii, and iii.

i) Following the location restriction component (**check one**):

\_\_\_ (1) **Curfew.** You are restricted to your residence every day ( ) from \_\_\_\_\_ to \_\_\_\_\_, or ( ) as directed by the supervising officer; or

\_\_\_ (2) **Home Detention.** You are restricted to your residence at all times except employment; education; religious services; medical, substance use, or mental health treatment; attorney visits; court appearances; court-ordered obligations; activities approved by the court; or essential activities approved in advance by the supervising officer; or

\_\_\_ (3) **Home Incarceration.** You are restricted to 24-hour-a-day lockdown at your residence except for medical necessities and court appearances or activities specifically approved by the court.

\_\_\_ (4) **Stand-Alone Monitoring.** You have no residential component (curfew, home detention, or home incarceration) restriction. However, you must comply with the location or travel restrictions as imposed by the court. **Note:** Stand-alone monitoring should be used in conjunction with global positioning system (GPS) or virtual mobile application technology.

ii) Submit to the following location monitoring technology (**check one**):

\_\_\_ (1) Location monitoring technology as directed by the supervising officer; or

\_\_\_ (2) GPS; or

\_\_\_ (3) Radio Frequency; or

\_\_\_ (4) Voice Recognition; or

\_\_\_ (5) Virtual Mobile Application. You must allow pretrial services or supervising officer to conduct initial and periodic inspection of the mobile device and mobile application to verify that 1) the monitoring software is functional, 2) the required configurations (e.g., location services) are unaltered, and 3) no efforts have been made to alter the mobile application.

iii) ( ) pay all or part of the cost of the location monitoring, including equipment loss or damage, based upon your ability to pay, as determined by the supervising officer.

\_\_\_ p. **RESIDENTIAL RE-ENTRY CENTER:** The defendant shall reside at a residential re-entry center or halfway house and abide by all the rules and regulations of the program. The cost to be paid by ( ) Pretrial Services or ( ) based on the defendant's ability to pay. You are restricted to the residential re-entry center/halfway house at all times except for:

( ) employment

( ) education

( ) religious services

( ) medical, substance abuse, or mental health treatment

( ) attorney visits

( ) court appearances

( ) court ordered obligations

( ) reporting to Pretrial Services

( ) other \_\_\_\_\_



DEFENDANT: Danielle Diarbakenly  
CASE NUMBER: 25-MJ-2536  
PAGE FOUR

q. Third-Party Custody: \_\_\_\_\_ will serve as a third-party custodian and will report any violations of the release conditions to the U.S. Probation Officer. Failure to comply with these requirements, the third-party custodian can be subject to the provisions of 18 U.S.C. § 401, Contempt of Court.

r. The defendant shall submit his person, property, residence, vehicle, papers, computers, (as defined in 18 U.S.C. 1030(e)(1)), other electronic communication or data storage devices or media, or office, to a search conducted by a United States Probation Officer. The defendant must warn any other occupants that the premises may be subject to searches pursuant to this condition. Any search must be conducted at a reasonable time and in a reasonable manner.

s. **Mandatory Adam Walsh Conditions:** Defendant shall abide by specified restrictions on personal associations, place of abode, or travel, to avoid all contact with an alleged victim of the crime and with a potential witness who may testify concerning the offense; report on a regular basis to a designated law enforcement agency, pretrial services agency or other agency; comply with a specified curfew (with electronic monitoring) and refrain from possessing a firearm, destructive device or other dangerous weapons.

t. Additional Sex Offense Conditions for Defendants Charged or Convicted of a Sexual Offense:

1. ( ) Defendant may not have contact with victim(s), or any child under the age of 18, unless approved by the Court or allowed by the U.S. Probation Officer.
2. ( ) The defendant shall not possess or use any data encryption technique or program and shall provide passwords and administrative rights to the U.S. Probation Officer.
3. ( ) Defendant shall participate in specialized sex offender evaluation and treatment, if necessary, and to contribute to the costs of services rendered based on ability to pay, as determined by the U.S. Probation Office.
4. ( ) Defendant shall not possess, procure, purchase or otherwise obtain any internet capable device and/or computer. Additionally, the defendant is prohibited from using another individual's computer or device that has internet capability.
5. ( ) Defendant is prohibited from establishing or maintaining any email account or social media account. Additionally, the defendant is prohibited from using another individual's email account or social media account. Must provide monthly or upon request, personal phone and credit card billings to Pretrial Services to confirm there are no services with any internet services provider.
6. ( ) Defendant is not permitted to enter places where children congregate including, but not limited to any play areas, playgrounds, libraries, children-themed restaurants, daycares, schools, amusement parks, carnivals/fairs, unless approved by the U.S. Probation Officer.
7. ( ) The defendant shall not be involved in any children's or youth organizations.
8. ( ) Defendant is prohibited from viewing, owning, or possessing any obscene, pornographic, or sexually stimulating visual or auditory material, including telephone, electronic media, computer programs, or computer services.
9. ( ) The defendant shall participate in a maintenance polygraph examination to periodically investigate the defendant's compliance. The polygraph examination shall specifically address only defendant's compliance or non-compliance with the special conditions of release and shall not inquire into the facts of the pending criminal case against defendant. The defendant will contribute to the costs of services rendered (co-payment) based on ability to pay or availability of third party payment.

✓ u. May travel to and from: MDFL & WD Michigan and must notify Pretrial Services of travel plans before leaving and upon return. (Reside) (Court)

✓ v. Comply with the following additional conditions of bond: Def. will reside at address in Naples  
9433 Lagomare Court,  
Naples, FL

DEFENDANT: Danielle Diarbakerly  
CASE NUMBER: 25-MJ-2536  
PAGE FIVE

**PENALTIES AND SANCTIONS APPLICABLE TO DEFENDANT**

Violation of any of the foregoing conditions of release may result in the immediate issuance of a warrant for the defendant's arrest, a revocation of release, and order of detention, as provided in 18 U.S.C. §3148, forfeiture of any bail posted, and a prosecution for contempt as provided in 18 U.S.C. §401, which could result in a possible term of imprisonment or a fine.

The commission of any offense while on pretrial release may result in an additional sentence upon conviction for such offense to a term of imprisonment of not more than ten years, if the offense is a felony; or a term of imprisonment of not more than one year, if the offense is a misdemeanor. This sentence shall be consecutive to any other sentence and must be imposed in addition to the sentence received for the offense itself.

Title 18 U.S.C. §1503 makes it a felony criminal offense punishable by imprisonment and a \$250,000 fine to intimidate or attempt to intimidate a witness, juror or officer of the court; 18 U.S.C. §1510 makes it a felony criminal offense punishable by imprisonment and a \$250,000 fine to obstruct a criminal investigation; 18 U.S.C. §1512 makes it a felony criminal offense punishable by imprisonment and a \$250,000 fine to tamper with a witness, victim or informant; and 18 U.S.C. §1513 makes it a felony criminal offense punishable by imprisonment and a \$250,000 fine to retaliate against a witness, victim or informant, or threaten to do so.

It is a criminal offense under 18 U.S.C. §3146, if after having been released, the defendant knowingly fails to appear as required by the conditions of release, or to surrender for the service of sentence pursuant to a court order. If the defendant was released in connection with a charge of, or while awaiting sentence, surrender for the service of a sentence, or appeal or certiorari after conviction for:

- (1) an offense punishable by death, life imprisonment, or imprisonment for a term of fifteen years or more the defendant shall be fined not more than \$250,000 or imprisoned for not more than ten years, or both;
- (2) an offense punishable by imprisonment for a term of five years or more, but less than fifteen years, the defendant shall be fined not more than \$250,000 or imprisoned for not more than five years, or both;
- (3) any other felony, the defendant shall be fined not more than \$250,000 or imprisoned not more than two years, or both;
- (4) a misdemeanor, the defendant shall be fined not more than \$100,000 or imprisoned not more than one year, or both.

A term of imprisonment imposed for failure to appear or surrender shall be consecutive to the sentence of imprisonment for any other offense. In addition, a failure to appear may result in the forfeiture of any bail posted, which means that the defendant will be obligated to pay the full amount of the bond, which may be enforced by all applicable laws of the United States.



DEFENDANT: Danielle Diarbakorly  
CASE NUMBER: 25-mj-2536  
PAGE SIX

**PENALTIES AND SANCTIONS APPLICABLE TO SURETIES**

Violation by the defendant of any of the foregoing conditions of release will result in an immediate obligation by the surety or sureties to pay the full amount of the bond. Forfeiture of the bond for any breach of one or more conditions may be declared by a judicial officer of any United States District Court having cognizance of the above entitled matter at the time of such breach, and if the bond is forfeited and the forfeiture is not set aside or remitted, judgment may be entered upon motion in such United States District Court against each surety jointly and severally for the amount of the bond, together with interest and costs, and execution may be issued and payment secured as provided by the Federal Rules of Criminal Procedure and other laws of the United States.

**SIGNATURES**

I have carefully read and I understand this entire appearance bond consisting of seven pages, or it has been read to me, and, if necessary, translated into my native language, and I know that I am obligated by law to comply with all of the terms of this bond. I promise to obey all conditions of this bond, to appear in court as required, and to surrender for service of any sentence imposed. I am aware of the penalties and sanctions outlined in this bond for violations of the terms of the bond.

If I am an agent acting for or on behalf of a corporate surety, I further represent that I am a duly authorized agent for the corporate surety and have full power to execute this bond in the amount stated.

**DEFENDANT**

Signed this 1st day of April, 2025 at Miami, Florida

Signed and acknowledged before me

DEFENDANT: (Signature) DRD

WITNESS: Ismael

Naples

Miami

City

FL

State

City

State

**CORPORATE SURETY**

Signed this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_ at \_\_\_\_\_, Florida

SURETY: \_\_\_\_\_

AGENT: (Signature) \_\_\_\_\_

PRINT NAME: \_\_\_\_\_

City

State

**INDIVIDUAL SURETIES**

Signed this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_ at \_\_\_\_\_, Florida

SURETY: (Signature) \_\_\_\_\_

PRINT NAME: \_\_\_\_\_

RELATIONSHIP TO DEFENDANT: \_\_\_\_\_

City

State

Signed this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_ at \_\_\_\_\_, Florida

SURETY: (Signature) \_\_\_\_\_

PRINT NAME: \_\_\_\_\_

RELATIONSHIP TO DEFENDANT: \_\_\_\_\_

City

State

Signed this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_ at \_\_\_\_\_, Florida

SURETY: (Signature) \_\_\_\_\_

PRINT NAME: \_\_\_\_\_

RELATIONSHIP TO DEFENDANT: \_\_\_\_\_

City

State

Signed this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_ at \_\_\_\_\_, Florida

SURETY: (Signature) \_\_\_\_\_

PRINT NAME: \_\_\_\_\_

RELATIONSHIP TO DEFENDANT: \_\_\_\_\_

City

State

**APPROVAL BY THE COURT**

Date: APRIL 2, 2025

Eduardo I. Sanchez

EDUARDO I. SANCHEZ  
UNITED STATES MAGISTRATE JUDGE

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
MIAMI DIVISION

Case No. 25-MJ-2536-SANCHEZ(SEALED)

UNITED STATES OF AMERICA,  
Plaintiff,

V.


Danielle Regina Diarbakerly,  
Defendant(s).  
\_\_\_\_\_ /

**ORDER**

**THIS CAUSE** came before the Court and pursuant to proceedings it is thereupon, PURSUANT TO THE ARREST OF THE ABOVE NAMED DEFENDANT, THIS CASE IS HEREBY UNSEALED.

**DONE AND ORDERED** at Miami, Florida.

Dated: 4/1/25

  
\_\_\_\_\_  
Eduardo I. Sanchez  
UNITED STATES MAGISTRATE JUDGE

**SOUTHERN DISTRICT OF FLORIDA**  
Case No. 25-MJ-2636-SANCHEZ(SEALED)

United States of America  
Plaintiff,

v.

Charging District's Case No. 25-CR-5

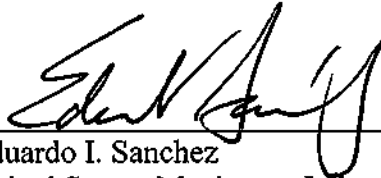
Danielle Regina Diarbakerly,  
Defendant.

**ORDER OF REMOVAL**

It appearing that in the **Western District Of Michigan**, an Indictment was filed against the above-named defendant on a charge of **WD MI/WARR/IND/ Money Laundering Conspiracy**, and that the defendant was arrested in the Southern District of Florida and was given a hearing before United States Magistrate Judge Eduardo I. Sanchez at Miami, Florida, which officially committed the defendant for removal to the **Western District Of Michigan**, it is ORDERED AND ADJUDGED that the defendant be removed to the above-named district for trial on said charge.

And it further appearing that the defendant waived further hearing in the said removal proceedings and was held by the Magistrate Judge Eduardo I. Sanchez for removal and posted bail in the amount of \$ 250K PSB which was approved by the United States Magistrate Judge Eduardo I. Sanchez, and it is further ORDERED that the defendant shall appear in the aforesaid district at such times and places as may be ordered by that District Court, in accordance with the terms and conditions of aforesaid bond furnished by the defendant, and it is further ORDERED that the funds, plus interest, which may have been deposited on behalf of this defendant with the Clerk of the Court under Bail Reform Act be transferred to the district where removed.

DONE AND ORDERED at Miami, Florida on 4/1/25.

  
\_\_\_\_\_  
Eduardo I. Sanchez  
United States Magistrate Judge

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

Case No: 25-MJ-2536

United States of America  
Plaintiff,

v.

Charging District's Case No. 25-CR-00005-PLM

Danielle Regina Dialbakerly  
Defendant.

WAIVER OF RULE 5 & 5.1 REMOVAL/IDENTITY HEARINGS

I understand that I have been charged in another district, the Western District of Michigan.

I have been informed of the charges and of my rights to:


- (1) retain counsel or request the assignment of counsel if I am unable to retain counsel;
- (2) an identity hearing to determine whether I am the person named in the charges;
- (3) production of the warrant, a certified copy of the warrant, or a reliable electronic copy of either;
- (4) a preliminary hearing within 14 days of my first appearance if I am in custody and 21 days otherwise — unless I am indicted — to determine whether there is probable cause to believe that an offense has been committed;
- (5) a hearing on any motion by the government for detention;
- (6) request transfer of the proceedings to this district under Fed. R. Crim. P. 20, to plead guilty.


I agree to waive my rights to: (check those that apply)

- ☒ An identity hearing and production of the warrant.
- ☐ A preliminary hearing.
- ☐ A detention hearing in the Southern District of Florida.
- ☐ An identity hearing, production of the warrant, and any preliminary or detention hearing to which I may be entitled to in this district. I request that those hearings be held in the prosecuting district, at a time set by that court.

I consent to the issuance of an order requiring my appearance in the prosecuting district where the charges are pending against me.

Date:

  
Defendant's Signature

  
EDUARDO I. SANCHEZ  
UNITED STATES MAGISTRATE JUDGE

**UNITED STATES DISTRICT COURT - WESTERN DISTRICT OF MICHIGAN  
CRIMINAL MINUTE SHEET**

<b>USA v.</b> Danielle Regina Diarbakerly	<b>Mag. Judge:</b> Ray Kent
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CASE NUMBER	DATE	TIME (begin/end)	PLACE	INTERPRETER
1:25-cr-00005-PLM	April 18, 2025	1:32 - 1:34 p.m. 1:36 - 1:52 p.m.	Grand Rapids	

**APPEARANCES:**

Government: Timothy P. VerHey	Defendant: Sanford Allen Schulman	Counsel Designation: Retained
----------------------------------	--------------------------------------	----------------------------------

OFFENSE LEVEL	CHARGING DOCUMENT/COUNTS	CHARGING DOCUMENT
Felony	Indictment	Read ____ Reading Waived <input checked="" type="checkbox"/>

TYPE OF HEARING	DOCUMENTS	CHANGE OF PLEA
<input type="checkbox"/> First Appearance <input checked="" type="checkbox"/> Arraignment: <input checked="" type="checkbox"/> mute <input type="checkbox"/> nolo contendere <input type="checkbox"/> not guilty <input type="checkbox"/> guilty <input checked="" type="checkbox"/> Initial Pretrial Conference <input type="checkbox"/> Detention    (waived <input type="checkbox"/> ) <input type="checkbox"/> Preliminary   (waived <input type="checkbox"/> ) <input type="checkbox"/> Rule 5 Proceeding <input type="checkbox"/> Revocation/SRV/PV <input type="checkbox"/> Bond Violation <input type="checkbox"/> Change of Plea <input type="checkbox"/> Sentencing <input type="checkbox"/> Other: _____	<input checked="" type="checkbox"/> Defendant's Rights <input type="checkbox"/> Waiver of _____ <input type="checkbox"/> Consent to Mag. Judge for _____ <input type="checkbox"/> Other: _____  Court to Issue: <input type="checkbox"/> Report & Recommendation <input type="checkbox"/> Order of Detention <input type="checkbox"/> Order to file IPTC Statements <input type="checkbox"/> Bindover Order <input type="checkbox"/> Order Appointing Counsel <input checked="" type="checkbox"/> Other: Rule 5(f); Order Amending Bond	Guilty Plea to Count(s) _____ of the _____ Count(s) to be dismissed at sentencing: _____ Presentence Report: <input type="checkbox"/> Ordered <input type="checkbox"/> Waived <input type="checkbox"/> Plea Accepted by the Court <input type="checkbox"/> No Written Plea Agreement  <b>EXPEDITED RESOLUTION</b> <input type="checkbox"/> Case appears appropriate for expedited resolution

ADDITIONAL INFORMATION	SENTENCING
The Court entered a plea of not guilty on defendant's behalf.	Imprisonment: _____ Probation: _____ Supervised Release: _____ Fine: \$ _____ Restitution: \$ _____ Special Assessment: \$ _____ Plea Agreement Accepted: <input type="checkbox"/> Yes <input type="checkbox"/> No Defendant informed of right to appeal: <input type="checkbox"/> Yes <input type="checkbox"/> No Counsel informed of obligation to file appeal: <input type="checkbox"/> Yes <input type="checkbox"/> No

CUSTODY/RELEASE STATUS	BOND AMOUNT AND TYPE
Continued on Bond	\$ _____
<b>CASE TO BE:</b> Referred to District Judge	<b>TYPE OF HEARING:</b> Further Proceedings
<b>Reporter/Recorder:</b> Digitally Recorded	<b>Courtroom Deputy:</b> B. Glass

DEFENDANT'S RIGHTS  
(in a Felony Case)

U.S. v. Danielle Regina Diarbakerly

Case No. 1:25-cr-00005-PLM

You have the right to have an attorney at every stage of this proceeding against you. You may hire your own attorney, or, if you cannot afford an attorney, the court will appoint one to represent you at no charge.

You have the right not to incriminate yourself, that is, the right to remain silent at all times. Any statement you do make may be used against you at trial.

You have the right to have the charges against you reviewed by a grand jury. A grand jury consists of at least 16 and not more than 23 persons. The function of the grand jury is to decide whether there is probable cause to believe that a crime has been committed and that you are the one who committed it. If at least 12 grand jurors find probable cause, the grand jury will return an "indictment," and the charges against you can proceed to trial. If the grand jury fails to return an indictment, the charges against you may be dropped.

You have the right to plead not guilty and the right to a trial by a jury of 12 persons selected at random from this district. You are presumed to be innocent, and the government has the burden of proving you guilty beyond a reasonable doubt.

You have the right to a speedy, public, jury trial.

At trial, you have the right to testify (or remain silent), to present evidence, to confront and cross-examine the witnesses against you, to call witnesses in your own behalf, and to compel their attendance by subpoena.

You may plead any one of three ways: not guilty, guilty, or, with the consent of the court, no contest. If you refuse to plead, a plea of not guilty will be entered.

If you plead guilty or no contest, there will be no trial of any kind. By so pleading, you give up your right to a trial by jury or judge, your right against self-incrimination, and your right to confront and cross-examine witnesses against you and to call witnesses in your own behalf.

I certify that I have read and understand the above.

Dated: April 18, 2025



\_\_\_\_\_  
Defendant's Signature



\_\_\_\_\_  
Attorney's Signature

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

Case No. 1:25-cr-5

v.

Hon. Paul L. Maloney  
U.S. District Judge

DANIELLE REGINA DIARBAKERLY,

Defendant.

**GOVERNMENT'S INITIAL PRETRIAL  
CONFERENCE SUMMARY  
STATEMENT**

**I. DISCOVERY**

**A. Statements of Defendants**

**1. Oral Statements [Rule 16(a)(1)(A)]**

- ☐ There are no written records of oral statements or other oral statements as defined in Rule 16(a)(1)(A).
- ☒ There are the following records of oral statements:  
4/1/25 statement to HSI (also recorded)

the substance of which

- ☐ has been disclosed to defense counsel  
☐ will be disclosed to defense counsel

**2. Written or Recorded Statements [Rule 16(a)(1)(B)]**

- ☐ There are no written or recorded statements or grand jury testimony of defendant.
- ☒ There are the following written or recorded statements or grand jury testimony:  
See above  
All written or recorded statements  
☐ have been disclosed to defense counsel  
☐ will be disclosed to defense counsel

**B. Defendant's Prior Record [Rule 16(a)(1)(D)]**

- ☒ The government has made due inquiry and is not aware of any prior criminal records.
- ☐ The government has disclosed defendant's prior criminal history.
- ☐ The government is now making inquiry into defendant's prior criminal history.  
The results will be disclosed to defense counsel upon receipt.

C. Documents and Tangible Objects [Rule 16(a)(1)(E)]

- ☐ The government has no documents, tangible objects, or physical evidence required to be disclosed.
- ☒ The government has the following documents, tangible objects, and physical evidence:
  - ☐ Controlled Substances:
  - ☐ Drug Paraphernalia:
  - ☒ Records: financial records, iCloud records, emails, documents involving fraud victims and tax records
  - ☐ Drug Records:
  - ☐ Firearms:
  - ☐ Inventory (attached)
  - ☐ Other:
- ☒ The government voluntarily notifies the defendant of the following search warrants issued and the warrant returns:
  - ☐ State –
  - ☒ Federal – 1:24-MJ-00129 (iCloud); 1:25-MJ-207 (iPhone/iPad)
- ☒ Defense counsel should make arrangements with AUSA VerHey to review physical evidence.

D. Reports of Examinations and Tests [Rule 16(a)(1)(F)]

- ☐ The government has no reports of examinations or tests required to be disclosed by Rule 16.
- ☒ The government has or expects to have reports of the following examinations and tests:

<input type="checkbox"/> Drug Analysis	<input type="checkbox"/> Handwriting	<input type="checkbox"/> Fingerprints
<input type="checkbox"/> DNA	<input type="checkbox"/> Firearms/Nexus	<input type="checkbox"/> Gun Operability
<input checked="" type="checkbox"/> Computer Forensics: defendant's phone	<input type="checkbox"/> Other:	

E. Reciprocal Discovery

- ☒ The government seeks reciprocal discovery.

F. Notice Under FRE 404(b)

- ☐ The government does not presently intend to introduce 404(b) evidence.
- ☒ The government does presently intend to introduce the following 404(b) evidence: the defendant was discovered in possession of fraudulent Federal Reserve documents in connection with another fraudulent scheme.
- ☐ The government will provide pretrial notice of 404(b) evidence

G. Other Discovery Matters:



**II. TRIAL**

- A. The government requests a ☒ jury ☐ non-jury trial.  
B. Length of trial excluding jury selection is estimated at 3 days

**III. MISCELLANEOUS**

- ☐ This case may be appropriate for expedited resolution.  
☒ The government is unaware at this time of any known conflict with defendant's representation by counsel. The United States will immediately advise counsel if any such conflict becomes known.  
☐ The government is aware of the following potential conflict(s):  
☒ Government's plea negotiation policy: **All plea negotiations must be finalized two weeks prior to the final pretrial conference if the defendant wants the government to support a reduction under USSG 3E1.1.**

Date: April 17, 2025

/s/ Timothy VerHey

Assistant United States Attorney

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

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UNITED STATES OF AMERICA,

Plaintiff,

vs.

DANIELLE DIARBAKERLY,

Defendant.

MOTION TO SEAL

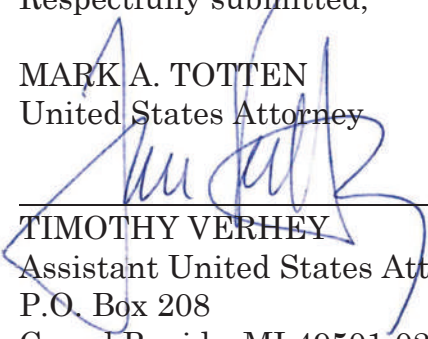
\_\_\_\_\_/

Now comes the United States of America by Mark A. Totten, United States Attorney for the Western District of Michigan, and Timothy VerHey, Assistant United States Attorney, and moves this court to seal the Indictment in the above entitled case in order that the execution of the arrest warrant be unimpeded and the investigation continue; and that such sealing remain in force and operation until the defendant(s) is(are) advised of these proceedings, arrested, the investigation is completed, or further order of this court. The government asks that the U.S. Probation Department be excepted from the seal.

Respectfully submitted,

MARK A. TOTTON  
United States Attorney

Dated: January 13, 2025

  
\_\_\_\_\_  
TIMOTHY VERHEY  
Assistant United States Attorney  
P.O. Box 208  
Grand Rapids, MI 49501-0208  
(616) 456-2404

IT IS SO ORDERED.

Dated: January 14, 2025

/s/ Phillip J. Green

PHILLIP J. GREEN  
United States Magistrate Judge  
United States District Court

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

Case No. 25-cr-5

Hon. PAUL L. MALONEY

vs.

DANIELLE REGINA DIARBAKERLY,

Defendant.

\_\_\_\_\_/

TIMOTHY PETER VERHEY  
U.S. Attorney's Office (Grand Rapids)  
330 Ionia Ave., NW  
Grand Rapids MI 49501-0208  
(616) 456-2404  
Email: timothy.verhey@usdoj.gov

SANFORD A. SCHULMAN  
Attorney for Defendant:  
DANIELLE REGINA DIARBAKERLY,  
500 Griswold Street, Suite 2340  
Detroit, Michigan 48226  
(313) 963-4740  
saschulman@comcast.net

\_\_\_\_\_/

**UNOPPOSED MOTION FOR AN ENDS OF JUSTICE  
CONTINUANCE AND TO RESET PRETRIAL AND TRIAL DATES  
AND WAIVER OF SPEEDY TRIAL ACT**

NOW COMES the Defendant, DANIELLE REGINA DIARBAKERLY's and submits this Unopposed MOTION FOR AN ENDS OF JUSTICE CONTINUANCE AND TO RESET PRETRIAL AND TRIAL DATES AND WAIVER OF SPEEDY TRIAL ACT.

1. The defendant, DANIELLE REGINA DIARBAKERLY is charged by way of an indictment with one count of Money Laundering in violation of 18 USC Sec. 1956(h), 18 USC Sec:1956(a)(1)(B)(i), 18 USC Sec.1341 and 18 USC Sec. 1343.

2. This Court set jury trial set for 6/24/2025 at 08:45 AM at 174 Federal Building, Kalamazoo, MI before District Judge Paul L. Maloney; final pretrial conference set for 6/16/2025 at 04:00 PM at 174 Federal Building, Kalamazoo, MI before District Judge Paul L. Maloney. The defense requires additional time to review discovery and to continue negotiations in hopes of resolving this matter

3. This request is made pursuant to 18 U.S.C. § 3161(h)(7)(A) and Local Criminal Rule 23.1 of the Local Rules of Practice and Procedure of the United States District Court for the Western District of Michigan. The Assistant United States Attorney in this matter, TIMOTHY PETER VERHEY, does not object to this request.

4. The defendant, DANIELLE REGINA DIARBAKERLY, consents to the continuances and waives her right to a speedy trial until the date rescheduled by this Court. (See Exhibit One: Consent to Waive Speedy Trial Act by DANIELLE REGINA DIARBAKERLY)

5. The defense is requesting a sixty (60) day continuance.

**Brief in Support**

On January 14, 2025, the defendant, Danielle Regina Diarbakerly, was charged in an indictment with one count of Money Laundering in violation of 18 USC Sec. 1956(h), 18 USC Sec:1956(a)(1)(B)(i), 18 USC Sec.1341 and 18 USC Sec. 1343.

On April 18, 2025, Ms. Diarbakerly voluntarily made her initial appearance before the magistrate of this Court and her unsecured bond was continued. On April 23, 2025 this Court set the following dates: jury trial set for 6/24/2025 at 08:45 AM at 174 Federal Building, Kalamazoo, MI before District Judge Paul L. Maloney; final pretrial conference set for 6/16/2025 at 04:00 PM at 174 Federal Building, Kalamazoo, MI before District Judge Paul L. Maloney

A STATUS CONFERENCE (COUNSEL ONLY) as to Danielle Regina Diarbakerly set for 6/3/2025 at 10:00 AM at 584 Federal Building, Grand Rapids, MI before Magistrate Judge Ray Kent; (bjg) (Entered: 05/29/2025)

The additional time will also give counsel sufficient time to review discovery and to explore a plea agreement

For these reasons, counsel is requesting that DANIELLE REGINA DIARBAKERLY's motion to extend the pretrial and trial dates be continued for at least 60 days. Counsel is unaware of any undue prejudice to the government that would result from this extension of time.

The authority to exclude time from the running of the 70-day period within which a defendant must be brought to trial granted to courts by 18 U.S.C. § 3161(h)(7)(A) offers "wide latitude to the judges. It allows the courts to respond to the needs of individual cases." United States v. White, 985 F.2d 271, 275 (6th Cir. 1993). A continuance in this case "outweigh[s] the best interest of the public and the defendant in a speedy trial." 18 U.S.C. §3161(h)(7)(A). Mr. Dookhan submits that such a continuance is necessary and that the ends of justice would be served if a continuance were granted.

Finally, MS. DIARBAKERLY argues that a continuance is both reasonable and for good cause. DANIELLE DIARBAKERLY understands that she has a right to a speedy trial pursuant to 18 U.S.C. § 3161, and a Consent to Adjournment has been signed and is attached herein.

WHEREFORE, Defendant, DANIELLE REGINA DIARBAKERLY's respectfully requests this Honorable Court grant this Unopposed MOTION FOR AN ENDS OF JUSTICE CONTINUANCE AND TO RESET PRETRIAL AND TRIAL DATES AND WAIVER OF SPEEDY TRIAL ACT for the reasons so stated herein.

Respectfully submitted,

/s/ Sanford A. Schulman  
SANFORD A. SCHULMAN  
Attorney for Defendant:  
DANIELLE REGINA DIARBAKERLY,  
500 Griswold Street, Suite 2340  
Detroit, Michigan 48226  
(313) 963-4740  
[saschulman@comcast.net](mailto:saschulman@comcast.net)

Date: May 30, 2025



UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

Case No. 25-cr-5  
Hon. PAUL L. MALONEY

vs.

DANIELLE REGINA DIARBAKERLY,

Defendant.

\_\_\_\_\_/   
TIMOTHY PETER VERHEY  
U.S. Attorney's Office (Grand Rapids)  
330 Ionia Ave., NW  
Grand Rapids MI 49501-0208  
(616) 456-2404  
Email: timothy.verhey@usdoj.gov

SANFORD A. SCHULMAN  
Attorney for Defendant:  
DANIELLE REGINA DIARBAKERLY,  
500 Griswold Street, Suite 2340  
Detroit, Michigan 48226  
(313) 963-4740  
saschulman@comcast.net  
\_\_\_\_\_ /

**CONSENT TO 60 DAY ADJOURNMENT**

NOW COMES the defendant, DANIELLE REGINA  
DIARBAKERLY, and hereby stipulates and agrees to adjourn for sixty  
(60) days the pre-trial and trial dates and states as follows:

1. I am aware that this Court issued an order on setting the following dates as to defendant, DANIELLE REGINA DIARBAKERLY, as follows: jury trial set for 6/24/2025 at 08:45 AM at 174 Federal Building, Kalamazoo, MI before District Judge Paul L. Maloney; final pretrial conference set for 6/16/2025 at 04:00 PM at 174 Federal Building, Kalamazoo, MI before District Judge Paul L. Maloney.

2. That I have reviewed the Motion for Ends-of-Justice Continuance and to Extend the dates in the Scheduling Order for Sixty days pursuant to 18 U.S.C. § 3161(h)(7)(A) filed on behalf.

3. That I consent to the adjournment and understand I have a right to a speedy trial pursuant to 18 U.S.C. Sec. 3161. I have discussed this with my attorney. I understand my attorney will be asking the Court for a continuance of the pretrial and trial dates because of the need to review discovery and to engage in pretrial plea negotiations.

4. I voluntarily agreed to this continuance and agree that it is in my best interest to do so. I hereby waive my right to a speedy trial and agree to any delay that results from it.



5. That no one has threatened or promised anything to sign an agree to this adjournment.

A handwritten signature in dark ink, appearing to read 'DRI', is written over a horizontal line.

DANIELLE REGINA DIARBAKERLY

Date: 5/30/2025

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

DANIELLE REGINA DIARBAKERLY,

Defendant.

No. 1:25-cr-5

HON. PAUL L MALONEY  
United States District Judge

**NOTICE OF SUBSTITUTION OF ATTORNEY**

NOTICE is given that Christopher M. O'Connor, Assistant United States Attorney, is substituted for Timothy VerHey, as counsel for the United States of America in the above action.

Respectfully submitted,

TIMOTHY VERHEY  
United States Attorney

Date: July 23, 2025

/s/ Christopher M. O'Connor  
CHRISTOPHER M. O'CONNOR  
Assistant United States Attorney  
P.O. Box 208  
Grand Rapids, Michigan 49501-0208  
(616) 456-2404

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

Case No. 1:25-cr-00005-PLM

v.

Hon. Paul L. Maloney

DANIELLE REGINA DIARBAKERLY,

Defendant.

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**NOTICE OF HEARING**

TAKE NOTICE that a hearing has been scheduled as set forth below:

Type of hearing(s): Status Conference  
Date/Time: June 3, 2025 10:00 AM  
Magistrate Judge: Ray Kent  
Place/Location: 584 Federal Building, Grand Rapids, MI

*This status conference is to address the Proposed Order Amending Conditions of Bond (ECF No. 15). Only counsel need to appear.*

RAY KENT  
U.S. Magistrate Judge

Dated: May 29, 2025

By: /s/ Brenda Glass  
Paralegal



**UNITED STATES DISTRICT COURT - WESTERN DISTRICT OF MICHIGAN  
CRIMINAL MINUTE SHEET**

<b>USA v.</b> Danielle Regina Diarbakerly	<b>Mag. Judge:</b> Ray Kent
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CASE NUMBER	DATE	TIME (begin/end)	PLACE	INTERPRETER
1:25-cr-00005-PLM-1	June 3, 2025	10:17 - 10:20 a.m.	Grand Rapids	

**APPEARANCES:**

Government: Timothy VerHey	Defendant: Sanford Allen Schulman (did not appear)	Counsel Designation: Retained
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OFFENSE LEVEL	CHARGING DOCUMENT/COUNTS	CHARGING DOCUMENT
Felony	Indictment	Read ____ Reading Waived ____

TYPE OF HEARING	DOCUMENTS	CHANGE OF PLEA
<input type="checkbox"/> First Appearance <input type="checkbox"/> Arraignment: <input type="checkbox"/> mute <input type="checkbox"/> nolo contendere <input type="checkbox"/> not guilty <input type="checkbox"/> guilty <input type="checkbox"/> Initial Pretrial Conference <input type="checkbox"/> Detention (waived <input type="checkbox"/> ) <input type="checkbox"/> Preliminary (waived <input type="checkbox"/> ) <input type="checkbox"/> Rule 5 Proceeding <input type="checkbox"/> Revocation/SRV/PV <input type="checkbox"/> Bond Violation <input type="checkbox"/> Change of Plea <input type="checkbox"/> Sentencing <input checked="" type="checkbox"/> Other: Omnibus	<input type="checkbox"/> Defendant's Rights <input type="checkbox"/> Waiver of _____ <input type="checkbox"/> Consent to Mag. Judge for _____ <input type="checkbox"/> Other: _____  Court to Issue: <input type="checkbox"/> Report & Recommendation <input type="checkbox"/> Order of Detention <input type="checkbox"/> Order to file IPTC Statements <input type="checkbox"/> Bindover Order <input type="checkbox"/> Order Appointing Counsel <input type="checkbox"/> Other: _____	Guilty Plea to Count(s) _____ of the _____ Count(s) to be dismissed at sentencing: _____ Presentence Report: <input type="checkbox"/> Ordered <input type="checkbox"/> Waived <input type="checkbox"/> Plea Accepted by the Court <input type="checkbox"/> No Written Plea Agreement  <b>EXPEDITED RESOLUTION</b> <input type="checkbox"/> Case appears appropriate for expedited resolution

ADDITIONAL INFORMATION	SENTENCING
	Imprisonment: _____ Probation: _____ Supervised Release: _____ Fine: \$ _____ Restitution: \$ _____ Special Assessment: \$ _____ Plea Agreement Accepted: <input type="checkbox"/> Yes <input type="checkbox"/> No Defendant informed of right to appeal: <input type="checkbox"/> Yes <input type="checkbox"/> No Counsel informed of obligation to file appeal: <input type="checkbox"/> Yes <input type="checkbox"/> No

CUSTODY/RELEASE STATUS	BOND AMOUNT AND TYPE
Continued on Bond	\$ _____
<b>CASE TO BE:</b> Referred to District Judge	<b>TYPE OF HEARING:</b> Further Proceedings
<b>Reporter/Recorder:</b> Digitally Recorded	<b>Courtroom Deputy:</b> K. Belanger

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

Case No. 1:25-CR-00005

v.

Hon. Paul L. Maloney

DANIELLE REGINA DIARBAKERLY,

Defendant.

\_\_\_\_\_ /

**ORDER MODIFYING CONDITIONS OF BOND**

Danielle Regina Diarbakerly was released on a \$250,000 personal surety bond by the Southern District of Florida on April 1, 2025 (ECF No. 6-2). On April 18, 2025, defendant appeared before this Court with counsel for an initial appearance, arraignment and initial pretrial conference at which time bond was addressed.

**IT IS HEREBY ORDERED** that defendant's bond be modified to add to the following condition:

1. I agree not to use or possess a narcotic drug or other controlled substances defined in 21 U.S.C. § 802 unless prescribed by a licensed medical practitioner. I agree not to use or possess marijuana, including medical marijuana and/or synthetic marijuana, and shall not frequent marijuana grow stores/care facilities, etc.
2. I agree not to possess a firearm or firearm replica, destructive device, or other weapon and that all such items shall be removed from my place of residence.
3. I agree to maintain or actively seek employment.
4. I agree not to apply for or enter into any loan or other credit transaction without the previous written permission of the Pretrial Service Office or Supervising Officer.
5. I agree not to possess personal identifying information of any other person.

**IT IS FURTHER ORDERED** that all other terms and conditions of defendant's bond shall remain in full force and effect.

Dated: April 18, 2025

/s/ Ray Kent  
RAY KENT  
United States Magistrate Judge



UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

Case No. 1:25-cr-00005-PLM

vs.

Hon. Paul L. Maloney

DANIELLE REGINA DIARBAKERLY,

Defendant.

---

**ORDER SCHEDULING PROGRESSION OF CASE**

**E-filing of Initial Pretrial Conference Summary Statement**

The parties have each e-filed an Initial Pretrial Conference Summary Statement, and the initial pretrial conference was held.

**Filing of Rule 12(b) Motions**

All motions shall be filed within twenty-one (21) days from the date of the initial pretrial conference of the defendant, unless otherwise ordered.

**Initial Discovery**

The provisions of the court's Standing Order Regarding Discovery in Criminal Cases (Administrative Order 20-RL-066) shall apply to the parties named above. The Standing Order is available on the court's website at [www.miwd.uscourts.gov](http://www.miwd.uscourts.gov), under Rules, Orders & Policies/Administrative Orders. Sanctions may be imposed for failure to follow the court's Standing Order Regarding Discovery in Criminal Cases.

IT IS SO ORDERED.

Dated: April 18, 2025

/s/ Ray Kent

UNITED STATES MAGISTRATE JUDGE

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

Case No. 1:25-cr-5

v.

HONORABLE PAUL L. MALONEY

DANIELLE REGINA DIARBAKERLY,

Defendant.

\_\_\_\_\_ /

**ORDER SETTING PRETRIAL AND JURY TRIAL**

**IT IS ORDERED** that jury selection and trial shall commence on **June 24, 2025 at 8:45 a.m.** in the United States District Court, 174 Federal Building, 410 W. Michigan Ave., Kalamazoo, Michigan. Counsel and the parties shall be present in the courtroom at 8:30 a.m., to address preliminary matters.

**IT IS FURTHER ORDERED** that a final pretrial conference shall be held on **June 16, 2025 at 4:00 p.m.** in the United States District Court, 174 Federal Building, 410 W. Michigan Ave., Kalamazoo, Michigan. Counsel who will try the case shall appear at the final pretrial conference. The attendance of the defendant at the final pretrial is required unless specifically waived.

All pending motions shall be heard at the time of the final pretrial conference unless otherwise notified by the Court.

**IT IS FURTHER ORDERED** that at the final pretrial conference the parties shall:

1. Discuss any legal issues, including motions in limine, or other evidentiary issues which may arise during the course of trial.
2. Enter into stipulations of uncontested facts.
3. Submit a proposed preliminary jury instruction defining the nature of the alleged offense and the elements of that offense.

4. Disclose the identity of all expert witnesses and agree, if possible, upon the qualifications of expert witnesses.
5. Agree, if possible upon the admissibility of exhibits. The parties shall mark their exhibits for identification prior to the final pretrial conference.
6. Advise the Court on the number of witnesses expected to be called and estimated length of trial.
7. Submit proposed voir dire questions. During voir dire, the parties will not be permitted to repeat questions asked on the jury questionnaire or questions asked by the Court. Discuss jury instructions. This Court uses the Sixth Circuit's Pattern Criminal Jury Instructions (West Publishing).
8. Review jury selection procedure.
9. Submit trial briefs and discuss legal issues which may arise at the trial.
10. Prior to the final pretrial conference, the parties shall meet and confer regarding jury instructions. At the final pretrial conference, the parties must submit a joint set of instructions. The parties must identify the instructions upon which they agree and disagree. The parties must also submit a brief statement of the nature of any disputes relative to the jury instructions.
11. If not previously made available to the other party, the parties shall make available to each other at the final pretrial conference pursuant to Fed. R. Evid. 1006 all summaries which the party intends to introduce into evidence plus duplicates of the supporting documents which have been summarized.

**\*To schedule a guilty plea, counsel shall contact Amy Redmond, case manager, at 269.337.5700.**

Dated: April 23, 2025

/s/ Paul L. Maloney  
Paul L. Maloney  
United States District Judge

Information and Guidelines

for Practice before

The Honorable Paul L. Maloney  
United States District Court  
for the Western District of Michigan

Hon. Paul L. Maloney  
137 Federal Building  
410 W. Michigan  
Kalamazoo, Michigan 49007  
(269) 381-4741

September 2024  
Criminal

## Communications and General Information

### 1. Addresses and Telephone Numbers

United States District Court  
137 Federal Building  
410 W. Michigan Avenue  
Kalamazoo, Michigan 49007  
Telephone: (269) 381-4741

Honorable Paul L. Maloney	(269) 381-4741
Judicial Assistant - Christina Cavazos	
Case Manager - Amy Redmond	(269) 337-5700
Court Reporter – Lauret Henry	(269) 720-9529

U.S. District Court Clerk's Office --  
Clerk of Court (269) 337-5706  
United States District Court  
107 Federal Building  
410 W. Michigan Avenue  
Kalamazoo, Michigan 49007

### 2. Hours

Judge Maloney's office is open Monday through Friday from 8:30 a.m. to 5:00 p.m.

## The Trial

### 1. Courtroom Decorum

The purpose of this paragraph is to describe certain basic principles concerning courtroom behavior and decorum. The requirements stated in this rule are minimal, not all-inclusive, and are intended to emphasize and supplement, not supplant or limit, the ethical obligations of counsel under the Rules of Professional Conduct or the time honored customs of experienced trial counsel. These requirements apply to all counsel and all persons at counsel table.

- A. This Court expects all attorneys and parties to act with courtesy and respect toward everyone in the courtroom. Avoid disparaging personal remarks or acrimony toward opposing counsel and remain wholly detached from any ill feeling between the litigants or witnesses. Address all remarks to the Court, not to opposing counsel. Refer to all persons, including witnesses, other counsel and the parties, by their surnames and not by their first or given names.

- B. Please be careful with the courtroom furniture. For example, do not put briefcases with metal feet on the tables. Do not bring anything to drink into the courtroom. Water is provided.
- C. Stand near the lectern while examining a witness and making statements to the jury; except that counsel may approach the Clerk's desk or the witness for purposes of handling or tendering exhibits. The recording system picks up lawyers' voices only when they are speaking into a microphone.
- D. Offers of, or requests for, a stipulation should be made privately - not within the hearing of the jury.
- E. Counsel shall admonish all persons at counsel table that gestures, facial expressions, audible comments, and the like, as manifestations of approval or disapproval, during the testimony of witnesses or at any other time, are prohibited.
- F. Cell phones or other electronic devices shall be in silent mode or turned off. The Court reserves the right to take appropriate action for violation of this policy.

## 2. Jury Selection

Counsel should submit an agreed statement of the case to be read to the jury which explains in simple terms the nature of the case. Unless the case is very complex, the summary should not exceed one paragraph. The purpose of the summary is to acquaint the jury with the nature of the case and to provide a basis for certain voir dire questions.

In criminal cases where jury trials have been demanded, the juries will generally be selected as follows:

- A. The Deputy Clerk will call 12 names for the jury panel plus one or two names for alternates, and such persons will be seated in the order they are called. Alternates will sit in seats 7 and 14 (1st and 2nd row on far right of jury box as you face it).
- B. The Court will then voir dire the jury asking its own questions and also questions proposed by the attorneys which have been submitted for review to the Court at or before the pretrial conference and which the Court considers appropriate. Attorneys will be permitted to participate in the questioning under limits set by the Court.
- C. Challenges for cause will be heard at side bar. The Court will excuse any prospective juror for cause where appropriate, and replace the excused juror, and the process will be repeated.
- D. When the Court has determined that none of the prospective jurors in the jury box should be dismissed for cause, the parties may exercise their peremptory

challenges. Counsel will be given a piece of paper with the appropriate number of challenges identified. In the first round of challenges, the government will write its peremptory challenges and give the paper to defense counsel who will then write defendant's peremptory challenges. After defense counsel writes defendant's peremptory challenges, the paper is returned to the Court. The Court will then excuse the challenged jurors.

The challenged jurors will be replaced, and the process repeated except (1) the defendant first exercises peremptory challenges during the second and all subsequent even numbered rounds; (2) no back strikes are permitted (if a person is not peremptorily challenged the first time possible, the person cannot be peremptorily challenged later).

Jurors can be challenged for cause anytime.

- E. The process repeats itself until there is a jury.
- F. In a case with multiple defendants, the Court may allow additional peremptory challenges.

### 3. Exhibits

All exhibits, charts, blow-ups must be shown to counsel prior to the beginning of trial. Do not wait until the witness is on the stand to show these items to opposing counsel.

The exhibits shall be clearly identified. In cases where counsel wishes to publish the exhibits to the jury and the party intends to introduce more than 10 documents, counsel shall arrange to have all exhibits digitized for projection on the large screen in the courtroom. Projection of exhibits is accomplished using the evidence cart in the courtroom. Questions concerning use of the evidence cart should be directed to the Systems Administrator for the U.S. District Court Clerk's Office at (616) 456-2381. In addition, notebooks with the exhibits shall be prepared. The exhibits should be divided and tabbed with the exhibit numbers or letters. A list of the exhibits should be located in the front of the notebooks. One set of notebooks is for the Court, one set is for the deputy clerk in the courtroom, one set is for the use of the witnesses, and there should be a set of notebooks to be used by each party or counsel for the parties. When bringing a document to the attention of the Court and witnesses, counsel asking the questions should refer to the notebook volume and exhibit number.

Offer exhibits into evidence as soon as the foundation has been laid. Often, when lawyers wait until the end of the examination or the case to make the offer, the witness has completely discussed the document during testimony and the document is not in evidence.

Offer exhibits that have identical foundation requirements in a group. It wastes time to lay a separate foundation on several identical kinds of documents, showing the witness one at a time. If they are all the same type of document, show the witness exhibits 1 through 10, ask the

witness to identify the exhibits and lay a foundation. (i.e., checking account statements of John Doe for the months January through June, 1993.) If the parties have stipulated to the admissibility of exhibits before trial, those exhibits will be admitted as a group after opening statements and before the first witness is called. These stipulated exhibits can then be referred to without the necessity of establishing a foundation.

4. Recesses

Before the jury arrives, and at each recess, you will be asked if there is anything that should be raised before the next session. If there is an issue to be raised, the Court shall be advised before the jury returns to the jury box.

Counsel may not be able to anticipate everything, but many matters should and will be taken up during the recesses.

5. Scheduling

Trials begin at 8:45 a.m. and recesses between 4:30-5:00 p.m.. There will be a 20 minute break mid-morning and mid-afternoon and a 1 hour lunch break. This schedule is subject to the other demands of the docket. You must have enough witnesses to fill up the day.

6. Deposition Designations, Motions In Limine, and Jury Instructions

Deposition designations, motions in limine, and jury instructions must be filed pursuant to the schedule set in the Case Management Order. The Court will not entertain additional motions in limine or deposition designations unless good cause is shown.



UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

Case No. 1:25-cr-5

v.

HONORABLE PAUL L. MALONEY

DANIELLE REGINA DIARBAKERLY,

Defendant.

\_\_\_\_\_/

**ORDER GRANTING ENDS OF JUSTICE CONTINUANCE**

This matter is before the Court on Defendant's request for an ends of justice continuance. Currently, the final pretrial conference is scheduled for June 16, 2025, and the jury trial is scheduled for June 24, 2025. The request for a continuance was made to allow additional time to review discovery and to continue negotiations with the government to try to resolve this matter outside of a trial. Defendant has consented to the request for a continuance (ECF No. 17-1). The Government does not oppose the request (ECF No. 17, PageID.52).

The Court finds that the ends of justice served by the granting of a continuance outweighs the best interest of the public and Defendant in a speedy trial. 18 U.S.C. § 3161(h)(7)(A), (B)(iv). Having considered the factors under § 3161(h)(7)(B) and the circumstances set forth in the motion, the Court finds that the additional time needed is warranted, and a miscarriage of justice would result absent the continuance. *See* 18 U.S.C. § 3161(h)(7)(B)(i), (B)(iv). Therefore,

**IT IS HEREBY ORDERED** that Defendant's Motion for Ends of Justice Continuance (ECF No. 17) is GRANTED. The final pretrial conference is rescheduled to **August 18, 2025 at 4:30 p.m.** The jury trial is rescheduled to **August 26, 2025 at 8:45 a.m..**

Dated: June 3, 2025

/s/ Paul L. Maloney  
Paul L. Maloney  
United States District Judge

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

Case No. 25-cr-5

Hon. PAUL L. MALONEY

vs.

DANIELLE REGINA DIARBAKERLY,

Defendant.

\_\_\_\_\_/

TIMOTHY PETER VERHEY  
U.S. Attorney's Office (Grand Rapids)  
330 Ionia Ave., NW  
Grand Rapids MI 49501-0208  
(616) 456-2404  
Email: timothy.verhey@usdoj.gov

SANFORD A. SCHULMAN  
Attorney for Defendant:  
DANIELLE REGINA DIARBAKERLY,  
500 Griswold Street, Suite 2340  
Detroit, Michigan 48226  
(313) 963-4740  
saschulman@comcast.net

\_\_\_\_\_ /

**UNOPPOSED ORDER AMENDING BOND CONDITIONS TO**  
**ALLOW DEFENDANT TO RELOCATE**

HAVING COME before the Court upon the Defendant,  
DANIELLE REGINA DIARBAKERLY's Unopposed Request to Modify  
her Bond Conditions and allow her to relocate, the address and third-

party information having been provided to the Government and pretrial services who have no objections to the request and the Court being otherwise fully advised in the premises;

IT IS HEREBY ORDERED AND ADJUDGED that the defendant, DANIELLE REGINA DIARBAKERLY, shall be permitted to relocate to the address provided to pretrial services and that all other terms and conditions of pretrial release shall remain in full force and effect and that the defendant shall be restricted to the state where she will reside.

SO STIPULATED:

/s/ w/consent Timothy Verhey  
TIMOTHY PETER VERHEY  
U.S. Attorney's Office (Grand Rapids)  
330 Ionia Ave., NW  
Grand Rapids MI 49501-0208  
(616) 456-2404 Email: [timothy.verhey@usdoj.gov](mailto:timothy.verhey@usdoj.gov)

/s/ Sanford A. Schulman  
SANFORD A. SCHULMAN  
Attorney for Defendant:  
DANIELLE REGINA DIARBAKERLY,  
500 Griswold Street, Suite 2340  
Detroit, Michigan 48226  
(313) 963-4740 [saschulman@comcast.net](mailto:saschulman@comcast.net)

SO ORDERED:

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Hon. PAUL L. MALONEY  
US District Court Judge

Western District of Michigan

BNDEIS

**U.S. District Court  
Southern District of Florida (Miami)  
CRIMINAL DOCKET FOR CASE #: 1:25-mj-02636-EIS All Defendants**

Case title: USA v. Danielle Regina Diarbakerly

Date Filed: 04/01/2025

Date Terminated: 04/01/2025

Assigned to: Magistrate Judge Eduardo I.  
Sanchez

**Defendant (1)**

**Danielle Regina Diarbakerly**  
70295-511  
*YOB: 1987; English*  
*TERMINATED: 04/01/2025*

represented by **Noticing FPD-MIA**  
305-530-7000  
Email: MIA\_ECF@FD.org  
*LEAD ATTORNEY*  
*ATTORNEY TO BE NOTICED*  
*Designation: Public Defender*  
*Appointment*

**Pending Counts**

None

**Disposition****Highest Offense Level (Opening)**

None

**Terminated Counts**

None

**Disposition****Highest Offense Level (Terminated)**

None

**Complaints**

18:U.S.C.§1956 MONEY LAUNDERING  
CONSPIRACY

**Disposition****Plaintiff**

USA

represented by **Noticing AUSA CR TP/SR**

Email: Usafls.transferprob@usdoj.gov

**LEAD ATTORNEY****ATTORNEY TO BE NOTICED***Designation: Retained*

Date Filed	#	Docket Text
04/01/2025	<a href="#"><u>1</u></a>	Magistrate Judge Removal of Arrest Warrant and Indictment from WESTERN DISTRICT OF MICHIGAN (GRAND RAPIDS) Case number in the other District 1:25-CR-00005-PLM as to Danielle Regina Diarbakerly (1). (at) (Entered: 04/01/2025)
04/01/2025	2	<b>ORAL</b> Government's ore tenus request to unseal the Indictment as to Danielle Regina Diarbakerly. (fbn) (Entered: 04/02/2025)
04/01/2025	<a href="#"><u>3</u></a>	ORDER granting 2 Government's ore tenus request to unseal the Indictment as to Danielle Regina Diarbakerly (1). Signed by Magistrate Judge Eduardo I. Sanchez on 4/1/2025. <i>See attached document for full details.</i> (fbn) (Entered: 04/02/2025)
04/01/2025	4	<b>ORAL</b> Defendant's ore tenus request for Court Appointed Counsel by Danielle Regina Diarbakerly. (fbn) (Entered: 04/02/2025)
04/01/2025	5	PAPERLESS ORDER granting 4 Defendant's ore tenus request for Court Appointed Counsel as to Danielle Regina Diarbakerly (1). Signed by Magistrate Judge Eduardo I. Sanchez on 4/1/2025. (fbn) (Entered: 04/02/2025)
04/01/2025	<a href="#"><u>7</u></a>	<p>Minute Order for proceedings held before Magistrate Judge Eduardo I. Sanchez: Initial Appearance in Rule 5(c)(3)/Rule 40 Proceedings as to Danielle Regina Diarbakerly held on 4/1/2025. Government's ore tenus request to unseal the Indictment-GRANTED. Defendant's ore tenus request for Court Appointed Counsel-GRANTED. Parties stipulated to \$250K PSB with conditions; Defendant Released. Defendant executed Waiver of Identity and Removal Hearing(s). Defendant advised of 4/14/2025 hearing in Michigan. Defendant Ordered Removed to the Western District of Michigan. Bond recommendation/set: Danielle Regina Diarbakerly (1) STIP-\$250K PSB. Date of Arrest or Surrender: 4/1/2025.</p> <p>It is ORDERED AND ADJUDGED that pursuant to the Due Process Protections Act, the Court confirms the United States obligation to disclose to the defendant all exculpatory evidence- that is, evidence that favors the defendant or casts doubt on the United States case, as required by Brady v. Maryland, 373 U.S. 83 (1963) and its progeny, and ORDERS the United States to do so. The government has a duty to disclose any evidence that goes to negating the defendants guilt, the credibility of a witness, or that would reduce a potential sentence. The defendant is entitled to this information without a request. Failure to disclose exculpatory evidence in a timely manner may result in consequences, including, but not limited to, exclusion of evidence, adverse jury instructions, dismissal of charges, contempt proceedings, disciplinary action, or sanctions by the Court. Attorney added: Noticing FPD-MIA for Danielle Regina Diarbakerly (Digital 14:29:33; 15:33:28) Signed by Magistrate Judge Eduardo I. Sanchez (fbn) (Entered: 04/02/2025)</p>
04/01/2025	<a href="#"><u>8</u></a>	WAIVER of Rule 5(c)(3)/Rule 40 Hearing by Danielle Regina Diarbakerly (fbn) (Entered: 04/03/2025)

04/01/2025	<a href="#">9</a>	ORDER OF REMOVAL ISSUED to District of Western District of Michigan as to Danielle Regina Diarbakerly. Closing Case for Defendant. Signed by Magistrate Judge Eduardo I. Sanchez on 4/1/2025. <i>See attached document for full details.</i> (fbn) (Main Document 9 replaced on 4/3/2025) (fbn). (Entered: 04/03/2025)
04/02/2025	<a href="#">6</a>	Invocation of Right to Silence and Counsel by Danielle Regina Diarbakerly (Ghomeshi, Sogol) (Entered: 04/02/2025)
04/02/2025	<a href="#">10</a>	\$250,000 PSB Bond Entered as to Danielle Regina Diarbakerly Approved by Magistrate Judge Eduardo I. Sanchez. <i>Please see bond image for conditions of release.</i> (fbn) (Additional attachment(s) added on 4/3/2025: # <a href="#">1</a> Restricted Bond with 7th Page) (fbn). (Entered: 04/03/2025)
04/03/2025	<a href="#">11</a>	Notice of Criminal Transfer to Western District of Michigan of a Rule 5 or Rule 32 Initial Appearance as to Danielle Regina Diarbakerly. Your case number is: 1:25-CR-00005-PLM. Docket sheet and documents attached. If you require certified copies of any documents, please call our Records Section at 305-523-5210. <u>Attention Receiving Court:</u> <i>If you wish to designate a different email address for future transfers, send your request to TXND at: InterDistrictTransfer_TXND@txnd.uscourts.gov.</i> (fbn) (Entered: 04/03/2025)



**SOUTHERN DISTRICT OF FLORIDA**  
Case No. 25-MJ-2636-SANCHEZ(SEALED)

United States of America  
Plaintiff,

v.

Charging District's Case No. 25-CR-5

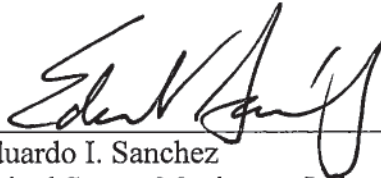
Danielle Regina Diarbakerly,  
Defendant.

**ORDER OF REMOVAL**

It appearing that in the **Western District Of Michigan**, an Indictment was filed against the above-named defendant on a charge of **WD MI/WARR/IND/ Money Laundering Conspiracy**, and that the defendant was arrested in the Southern District of Florida and was given a hearing before United States Magistrate Judge Eduardo I. Sanchez at Miami, Florida, which officially committed the defendant for removal to the **Western District Of Michigan**, it is ORDERED AND ADJUDGED that the defendant be removed to the above-named district for trial on said charge.

And it further appearing that the defendant waived further hearing in the said removal proceedings and was held by the Magistrate Judge Eduardo I. Sanchez for removal and posted bail in the amount of \$ 250K PSB which was approved by the United States Magistrate Judge Eduardo I. Sanchez, and it is further ORDERED that the defendant shall appear in the aforesaid district at such times and places as may be ordered by that District Court, in accordance with the terms and conditions of aforesaid bond furnished by the defendant, and it is further ORDERED that the funds, plus interest, which may have been deposited on behalf of this defendant with the Clerk of the Court under Bail Reform Act be transferred to the district where removed.

DONE AND ORDERED at Miami, Florida on 4/1/25.

  
\_\_\_\_\_  
Eduardo I. Sanchez  
United States Magistrate Judge

Revised 03/2025

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

APPEARANCE BOND: \_\_\_\_\_

CASE NO.: 25-MJ-2536

UNITED STATES OF AMERICA:

Plaintiff,

v.

USM #: 70295-511

Defendant,

Danielle Regina Diarbakerly

I, the undersigned defendant and I or we, the undersigned sureties, jointly and severally acknowledge that we and our personal representatives, jointly and severally, are bound to pay the United States of America, the sum of \$ 250,000 personal Surety Bond

**STANDARD CONDITIONS OF BOND**

**The conditions of this bond are that the defendant:**

1. Shall appear before this Court and at such other places as the defendant may be required to appear, in accordance with any and all orders and directions relating to the defendant's appearance in this case, including appearance for violation of a condition of the defendant's release as may be ordered or notified by this Court or any other United States District Court to which the defendant may be held to answer or the cause transferred. The defendant is required to ascertain from the Clerk of Court or defense counsel the time and place of all scheduled proceedings on the case. In no event may a defendant assume that his or her case has been dismissed unless the Court has entered an order of dismissal. The defendant is to abide by any judgment entered in such matter by surrendering to serve any sentence imposed and obeying any order or direction in connection with such judgment. This is a continuing bond, including any proceeding on appeal or review, which shall remain in full force and effect until such time as the Court shall order otherwise.
2. May not travel outside the Southern District of Florida unless otherwise approved by the Court prior to any such travel. The Southern District of Florida consists of the following counties: Broward, Highlands, Indian River, Martin, Miami-Dade, Monroe, Okeechobee, Palm Beach and St. Lucie.
3. May not change his/her present address without prior notification and approval from the U.S. Probation Officer or the Court.
4. Must cooperate with law enforcement officers in the collection of a DNA sample if the collection is required by 42 U.S.C. Section 14135a.
5. Must not violate any federal, state or local law while on release in this case. Should the defendant come in contact with law enforcement he/she shall notify the U.S. Probation Officer within 72 hours.

DEFENDANT: Danielle Diarbakerly  
CASE NUMBER: 25-MJ-2536  
PAGE TWO

**SPECIAL CONDITIONS OF BOND**

In addition to compliance with the previously stated conditions of bond, the defendant must comply with the special conditions checked below:

- ☒ a. Surrender all passports and travel documents, if any, to Pretrial Services and not obtain any travel documents during the pendency of the case;
- ☒ b. Report to Pretrial Services as follows: ( ☒ ) as directed or \_\_\_ time(s) a week in person and \_\_\_ time(s) a week by telephone;
- \_\_\_ c. Submit to substance abuse testing and/or treatment, contribute to the cost of services rendered based on ability to pay, as determined by the U.S. Probation Officer;
- \_\_\_ d. Refrain from \_\_\_ excessive OR \_\_\_ abstain from alcohol use or any use of a narcotic drug or other controlled substance, as defined in section 102 of the Controlled Substances Act (21 U.S.C. § 802), without a prescription by a licensed medical practitioner;
- \_\_\_ e. Participate in a mental health assessment and/or treatment and contribute to the costs of services rendered based on ability to pay, as determined by the U.S. Probation Officer;
- \_\_\_ f. Employment restriction(s): \_\_\_\_\_
- \_\_\_ g. Maintain or actively seek full-time employment;
- \_\_\_ h. Maintain or begin an educational program;
- \_\_\_ i. Avoid all contact with victims or witnesses to the crimes charged, except through counsel. The AUSA shall provide defense counsel and pretrial services with the names of all victims or witnesses. The prohibition against contact does not take effect until defense counsel receives the list. The prohibition against contact applies only to those persons on the list, but the prosecutor may expand the list by sending written notice to defense counsel and pretrial services.;
- \_\_\_ j. Avoid all contact with co-defendants and defendants in related cases, except through counsel;
- \_\_\_ k. Refrain from possessing a firearm, destructive device or other dangerous weapons and shall surrender (if any), their concealed weapons permit to the U.S. Probation Office;
- \_\_\_ l. None of the signatories may sell, pledge, mortgage, hypothecate, encumber, etc., any real property they own, until the bond is discharged, or otherwise modified by the Court;
- \_\_\_ m. May not visit commercial transportation establishment: airports, seaport/marinas, commercial bus terminals, train stations, etc.;
- \_\_\_ n. Defendant shall consent to the U.S. Probation Officer conducting periodic unannounced examinations of the defendant's computer equipment at his/her place of employment or on the computer at his/her residence which may include retrieval and copying of all data from the computer(s) and any internal or external peripherals to ensure compliance with this condition and/or removal of such equipment for the purpose of conducting a more thorough inspection; and consent at the direction of the U.S. Probation Officer to have installed on the defendant's computer(s), at the defendant's expense, any hardware or software systems to monitor the defendant's computer use;

DEFENDANT: Danielle Diarbakerly  
CASE NUMBER: 25-mj-2536  
PAGE THREE

\_\_\_ o. **LOCATION MONITORING PROGRAM:** The defendant shall participate in the location monitoring program and comply with the requirements, as directed in subsections i, ii, and iii.

i) Following the location restriction component (**check one**):

\_\_\_ (1) **Curfew.** You are restricted to your residence every day ( ) from \_\_\_\_\_ to \_\_\_\_\_, or ( ) as directed by the supervising officer; or

\_\_\_ (2) **Home Detention.** You are restricted to your residence at all times except employment; education; religious services; medical, substance use, or mental health treatment; attorney visits; court appearances; court-ordered obligations; activities approved by the court; or essential activities approved in advance by the supervising officer; or

\_\_\_ (3) **Home Incarceration.** You are restricted to 24-hour-a-day lockdown at your residence except for medical necessities and court appearances or activities specifically approved by the court.

\_\_\_ (4) **Stand-Alone Monitoring.** You have no residential component (curfew, home detention, or home incarceration) restriction. However, you must comply with the location or travel restrictions as imposed by the court. **Note:** Stand-alone monitoring should be used in conjunction with global positioning system (GPS) or virtual mobile application technology.

ii) Submit to the following location monitoring technology (**check one**):

\_\_\_ (1) Location monitoring technology as directed by the supervising officer; or

\_\_\_ (2) GPS; or

\_\_\_ (3) Radio Frequency; or

\_\_\_ (4) Voice Recognition; or

\_\_\_ (5) Virtual Mobile Application. You must allow pretrial services or supervising officer to conduct initial and periodic inspection of the mobile device and mobile application to verify that 1) the monitoring software is functional, 2) the required configurations (e.g., location services) are unaltered, and 3) no efforts have been made to alter the mobile application.

iii) ( ) pay all or part of the cost of the location monitoring, including equipment loss or damage, based upon your ability to pay, as determined by the supervising officer.

\_\_\_ p. **RESIDENTIAL RE-ENTRY CENTER:** The defendant shall reside at a residential re-entry center or halfway house and abide by all the rules and regulations of the program. The cost to be paid by ( ) Pretrial Services or ( ) based on the defendant's ability to pay. You are restricted to the residential re-entry center/halfway house at all times except for:

( ) employment

( ) education

( ) religious services

( ) medical, substance abuse, or mental health treatment

( ) attorney visits

( ) court appearances

( ) court ordered obligations

( ) reporting to Pretrial Services

( ) other \_\_\_\_\_



DEFENDANT: Danielle Diarbakenly  
CASE NUMBER: 25-MJ-2536  
PAGE FOUR

q. Third-Party Custody: \_\_\_\_\_ will serve as a third-party custodian and will report any violations of the release conditions to the U.S. Probation Officer. Failure to comply with these requirements, the third-party custodian can be subject to the provisions of 18 U.S.C. § 401, Contempt of Court.

r. The defendant shall submit his person, property, residence, vehicle, papers, computers, (as defined in 18 U.S.C. 1030(e)(1)), other electronic communication or data storage devices or media, or office, to a search conducted by a United States Probation Officer. The defendant must warn any other occupants that the premises may be subject to searches pursuant to this condition. Any search must be conducted at a reasonable time and in a reasonable manner.

s. **Mandatory Adam Walsh Conditions:** Defendant shall abide by specified restrictions on personal associations, place of abode, or travel, to avoid all contact with an alleged victim of the crime and with a potential witness who may testify concerning the offense; report on a regular basis to a designated law enforcement agency, pretrial services agency or other agency; comply with a specified curfew (with electronic monitoring) and refrain from possessing a firearm, destructive device or other dangerous weapons.

t. Additional Sex Offense Conditions for Defendants Charged or Convicted of a Sexual Offense:

1. ( ) Defendant may not have contact with victim(s), or any child under the age of 18, unless approved by the Court or allowed by the U.S. Probation Officer.
2. ( ) The defendant shall not possess or use any data encryption technique or program and shall provide passwords and administrative rights to the U.S. Probation Officer.
3. ( ) Defendant shall participate in specialized sex offender evaluation and treatment, if necessary, and to contribute to the costs of services rendered based on ability to pay, as determined by the U.S. Probation Office.
4. ( ) Defendant shall not possess, procure, purchase or otherwise obtain any internet capable device and/or computer. Additionally, the defendant is prohibited from using another individual's computer or device that has internet capability.
5. ( ) Defendant is prohibited from establishing or maintaining any email account or social media account. Additionally, the defendant is prohibited from using another individual's email account or social media account. Must provide monthly or upon request, personal phone and credit card billings to Pretrial Services to confirm there are no services with any internet services provider.
6. ( ) Defendant is not permitted to enter places where children congregate including, but not limited to any play areas, playgrounds, libraries, children-themed restaurants, daycares, schools, amusement parks, carnivals/fairs, unless approved by the U.S. Probation Officer.
7. ( ) The defendant shall not be involved in any children's or youth organizations.
8. ( ) Defendant is prohibited from viewing, owning, or possessing any obscene, pornographic, or sexually stimulating visual or auditory material, including telephone, electronic media, computer programs, or computer services.
9. ( ) The defendant shall participate in a maintenance polygraph examination to periodically investigate the defendant's compliance. The polygraph examination shall specifically address only defendant's compliance or non-compliance with the special conditions of release and shall not inquire into the facts of the pending criminal case against defendant. The defendant will contribute to the costs of services rendered (co-payment) based on ability to pay or availability of third party payment.

✓ u. May travel to and from: MDFL & WD Michigan and must notify Pretrial Services of travel plans before leaving and upon return. (Reside) (Court)

✓ v. Comply with the following additional conditions of bond: Def. will reside at address in Naples  
9433 Lagomare Court,  
Naples, FL

DEFENDANT: Danielle Diarbakerly  
CASE NUMBER: 25-MJ-2536  
PAGE FIVE

**PENALTIES AND SANCTIONS APPLICABLE TO DEFENDANT**

Violation of any of the foregoing conditions of release may result in the immediate issuance of a warrant for the defendant's arrest, a revocation of release, and order of detention, as provided in 18 U.S.C. §3148, forfeiture of any bail posted, and a prosecution for contempt as provided in 18 U.S.C. §401, which could result in a possible term of imprisonment or a fine.

The commission of any offense while on pretrial release may result in an additional sentence upon conviction for such offense to a term of imprisonment of not more than ten years, if the offense is a felony; or a term of imprisonment of not more than one year, if the offense is a misdemeanor. This sentence shall be consecutive to any other sentence and must be imposed in addition to the sentence received for the offense itself.

Title 18 U.S.C. §1503 makes it a felony criminal offense punishable by imprisonment and a \$250,000 fine to intimidate or attempt to intimidate a witness, juror or officer of the court; 18 U.S.C. §1510 makes it a felony criminal offense punishable by imprisonment and a \$250,000 fine to obstruct a criminal investigation; 18 U.S.C. §1512 makes it a felony criminal offense punishable by imprisonment and a \$250,000 fine to tamper with a witness, victim or informant; and 18 U.S.C. §1513 makes it a felony criminal offense punishable by imprisonment and a \$250,000 fine to retaliate against a witness, victim or informant, or threaten to do so.

It is a criminal offense under 18 U.S.C. §3146, if after having been released, the defendant knowingly fails to appear as required by the conditions of release, or to surrender for the service of sentence pursuant to a court order. If the defendant was released in connection with a charge of, or while awaiting sentence, surrender for the service of a sentence, or appeal or certiorari after conviction for:

- (1) an offense punishable by death, life imprisonment, or imprisonment for a term of fifteen years or more the defendant shall be fined not more than \$250,000 or imprisoned for not more than ten years, or both;
- (2) an offense punishable by imprisonment for a term of five years or more, but less than fifteen years, the defendant shall be fined not more than \$250,000 or imprisoned for not more than five years, or both;
- (3) any other felony, the defendant shall be fined not more than \$250,000 or imprisoned not more than two years, or both;
- (4) a misdemeanor, the defendant shall be fined not more than \$100,000 or imprisoned not more than one year, or both.

A term of imprisonment imposed for failure to appear or surrender shall be consecutive to the sentence of imprisonment for any other offense. In addition, a failure to appear may result in the forfeiture of any bail posted, which means that the defendant will be obligated to pay the full amount of the bond, which may be enforced by all applicable laws of the United States.

DEFENDANT: Danielle Diarbakerly  
CASE NUMBER: 25-mj-2536  
PAGE SIX

**PENALTIES AND SANCTIONS APPLICABLE TO SURETIES**

Violation by the defendant of any of the foregoing conditions of release will result in an immediate obligation by the surety or sureties to pay the full amount of the bond. Forfeiture of the bond for any breach of one or more conditions may be declared by a judicial officer of any United States District Court having cognizance of the above entitled matter at the time of such breach, and if the bond is forfeited and the forfeiture is not set aside or remitted, judgment may be entered upon motion in such United States District Court against each surety jointly and severally for the amount of the bond, together with interest and costs, and execution may be issued and payment secured as provided by the Federal Rules of Criminal Procedure and other laws of the United States.

**SIGNATURES**

I have carefully read and I understand this entire appearance bond consisting of seven pages, or it has been read to me, and, if necessary, translated into my native language, and I know that I am obligated by law to comply with all of the terms of this bond. I promise to obey all conditions of this bond, to appear in court as required, and to surrender for service of any sentence imposed. I am aware of the penalties and sanctions outlined in this bond for violations of the terms of the bond.

If I am an agent acting for or on behalf of a corporate surety, I further represent that I am a duly authorized agent for the corporate surety and have full power to execute this bond in the amount stated.

**DEFENDANT**

Signed this 1st day of April, 2025 at miami, Florida

Signed and acknowledged before me:

DEFENDANT: (Signature) DRD

Naples

City

State

WITNESS: Ismael

miami

City

FL

State

**CORPORATE SURETY**

Signed this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_ at \_\_\_\_\_, Florida

SURETY: \_\_\_\_\_

AGENT: (Signature) \_\_\_\_\_

PRINT NAME: \_\_\_\_\_

City

State

**INDIVIDUAL SURETIES**

Signed this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_ at \_\_\_\_\_, Florida

SURETY: (Signature) \_\_\_\_\_

PRINT NAME: \_\_\_\_\_

RELATIONSHIP TO DEFENDANT: \_\_\_\_\_

City

State

Signed this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_ at \_\_\_\_\_, Florida

SURETY: (Signature) \_\_\_\_\_

PRINT NAME: \_\_\_\_\_

RELATIONSHIP TO DEFENDANT: \_\_\_\_\_

City

State

Signed this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_ at \_\_\_\_\_, Florida

SURETY: (Signature) \_\_\_\_\_

PRINT NAME: \_\_\_\_\_

RELATIONSHIP TO DEFENDANT: \_\_\_\_\_

City

State

Signed this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_ at \_\_\_\_\_, Florida

SURETY: (Signature) \_\_\_\_\_

PRINT NAME: \_\_\_\_\_

RELATIONSHIP TO DEFENDANT: \_\_\_\_\_

City

State

**APPROVAL BY THE COURT**

Date: APRIL 2, 2025

Eduardo I. Sanchez

EDUARDO I. SANCHEZ  
UNITED STATES MAGISTRATE JUDGE



UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

Case No: 25-MJ-2536

United States of America  
Plaintiff,

v.

Charging District's Case No. 25-CR-00005-PLM

Danielle Regina Diabakerly  
Defendant.

WAIVER OF RULE 5 & 5.1 REMOVAL/IDENTITY HEARINGS

I understand that I have been charged in another district, the Western District of Michigan.

I have been informed of the charges and of my rights to:

- (1) retain counsel or request the assignment of counsel if I am unable to retain counsel;
- (2) an identity hearing to determine whether I am the person named in the charges;
- (3) production of the warrant, a certified copy of the warrant, or a reliable electronic copy of either;
- (4) a preliminary hearing within 14 days of my first appearance if I am in custody and 21 days otherwise — unless I am indicted — to determine whether there is probable cause to believe that an offense has been committed;
- (5) a hearing on any motion by the government for detention;
- (6) request transfer of the proceedings to this district under Fed. R. Crim. P. 20, to plead guilty.

I agree to waive my rights to: (check those that apply)

- ☒ An identity hearing and production of the warrant.
- ☐ A preliminary hearing.
- ☐ A detention hearing in the Southern District of Florida.
- ☐ An identity hearing, production of the warrant, and any preliminary or detention hearing to which I may be entitled to in this district. I request that those hearings be held in the prosecuting district, at a time set by that court.

I consent to the issuance of an order requiring my appearance in the prosecuting district where the charges are pending against me.

Date:

  
Defendant's Signature

  
EDUARDO I. SANCHEZ  
UNITED STATES MAGISTRATE JUDGE



## MINUTE ORDER

Page 9

## Magistrate Judge Eduardo I. Sanchez

Atkins Building Courthouse - 6th Floor

Date: 4/1/25

Time: 2:00 p.m.

Defendant: Danielle Regina Diarbakerly J#: 70295-511 Case #: 25-MJ-2636-SANCHEZ(SEALED) unsealedAUSA: Dan Rosenfeld Attorney: Sogol Ghomeshi - AFPOViolation: WD MI/WARR/IND/ Money Laundering ConspiracySurr/Arrest Date: 04/01/25 YOB: 1987Proceeding: Initial Appearance

CJA Appt: \_\_\_\_\_

Bond/PTD Held: Yes No Recommended Bond: \_\_\_\_\_Bond Set at: STIP- \$250K PSB

Co-signed by: \_\_\_\_\_

☒ Surrender and/or do not obtain passports/travel docsLanguage: English☒ Report to PTS as directed/or \_\_\_\_\_ x's a week/month by phone: \_\_\_\_\_ x's a week/month in person

Disposition: \_\_\_\_\_

Random urine testing by Pretrial

☐ Services

Treatment as deemed necessary

☐ Refrain from excessive use of alcohol☐ Participate in mental health assessment & treatment☐ Maintain or seek full-time employment/education☐ No contact with victims/witnesses, except through counsel☐ No firearms☐ Not to encumber property☐ May not visit transportation establishments☐ Home Confinement/Electronic Monitoring and/or

Curfew \_\_\_\_\_ pm to \_\_\_\_\_ am, paid by \_\_\_\_\_

☐ Allowances: Medical needs, court appearances, attorney visits, religious, employment☒ Travel extended to: and from: MD-FL & WD-Michigan (Reside) (Court)☒ Other: Def't will reside at address in Naples stated on the record☒ Grants one term request to Unseal the Indictment Granted.

- Def't. advised of rights and charges; Def't. sworn

☒ Def't. one term request for Court Appointed Counsel - Granted.

- AFPO is appointed.

- Patches stipulated to \$250K PSB w/conditions; Def't. Released

- Def't. executed waiver of Identity &amp; Removal Hearings

- Def't. advised of M14 hearing in Michigan

Def't. Ordered Removed to the WD of Michigan

NEXT COURT APPEARANCE

Date:

Time:

Judge:

- Brady Order Given

Report RE Counsel: \_\_\_\_\_

PTD/Bond Hearing: \_\_\_\_\_

Prelim/Arraign or Removal: \_\_\_\_\_

Status Conference RE: \_\_\_\_\_

D.A.R. 14:29:33; 15:33:28

Time in Court: \_\_\_\_\_

18 minutes

s/Eduardo I. Sanchez

Magistrate Judge

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 25-MJ-2636-SANCHEZ

UNITED STATES OF AMERICA,

Plaintiff,

v.

DANIELLE REGINA DIARBAKERLY,

Defendant.

\_\_\_\_\_ /

**DEFENDANT'S INVOCATION OF  
RIGHTS TO SILENCE AND COUNSEL**

The defendant named above does hereby invoke his rights to remain silent and to counsel with respect to any and all questioning or interrogation, regardless of the subject matter, including, but not limited to: matters that may bear on or relate to arrest, searches and seizures, bail, pretrial release or detention, evidence at trial, guilt or innocence, forfeitures; or that may be relevant to sentencing, enhanced punishments, factors applicable under the U.S. Sentencing Guidelines, restitution, immigration status or consequences resulting from arrest or conviction; appeals or other post-trial proceedings.

The Defendant requests that the United States Attorney ensure that this invocation of rights is honored, by forwarding a copy of it to all law enforcement agents, government officials, or employees associated with the investigation of any matters relating to the defendant. Any contact with the Defendant must be made through the defendant's lawyer, undersigned counsel.

Respectfully Submitted,

HECTOR A. DOCPICO  
FEDERAL PUBLIC DEFENDER

By: s/ Sogol Ghomeshi  
Sogol Ghomeshi  
Assistant Federal Public Defender  
Florida Bar No.: 1002979  
150 W. Flagler Street, Suite 1700  
Miami, Florida 33130-1556  
Tel: (305) 533-4255  
Email: [sogol\\_ghomeshi@fd.org](mailto:sogol_ghomeshi@fd.org)

**CERTIFICATE OF SERVICE**

I HEREBY certify that on **April 2, 2025**, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those counsel or parties who are not authorized to receive electronically Notices of Electronic Filing.

By: s/ Sogol Ghomeshi  
Sogol Ghomeshi, AFD

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

Case No. 1:25-cr-00005

vs.

Hon. Paul L. Maloney

DANIELLE REGINA DIARBAKERLY,

Defendant.

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**ORDER**

Pursuant to the Due Process Protections Act, the Court reminds the government of its obligations under *Brady v. Maryland*, 373 U.S. 83 (1963), to disclose evidence favorable to the defendant and material to the defendant's guilt or punishment. The government is ordered to comply with *Brady* and its progeny. The failure to do so in a timely manner may result in consequences, including dismissal of the indictment or information, exclusion of government evidence or witnesses, adverse jury instructions, dismissal of charges, contempt proceedings, sanctions by the Court, or any other remedy that is just under the circumstances.

IT IS SO ORDERED.

Dated: April 18, 2025

/s/ Ray Kent  
UNITED STATES MAGISTRATE JUDGE

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

DANIELLE REGINA DIARBAKERLY,

Defendant.

**INDICTMENT**

\_\_\_\_\_/

The Grand Jury charges:

(Money Laundering Conspiracy)

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

DANIELLE REGINA DIARBAKERLY

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

### **Object of the Conspiracy**

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

### **Means and Methods**

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

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

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

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

18 U.S.C. § 1956(h)

18 U.S.C. § 1956(a)(1)(B)(i)

18 U.S.C. § 1341

18 U.S.C. § 1343

FORFEITURE ALLEGATION  
(Money Laundering)

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

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

DANIELLE REGINA DIARBAKERLY,

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

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

2. SUBSTITUTE ASSETS: If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to 21 U.S.C. § 853(p) as incorporated by 18 U.S.C. § 982(b).



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

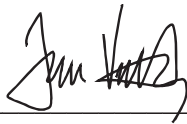
A TRUE BILL

[ /s/ Redacted ]

MARK A. TOTTEN  
United States Attorney

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GRAND JURY FOREPERSON



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TIMOTHY VERHEY  
Assistant United States Attorney

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

DANIELLE REGINA DIARBAKERLY,

Defendant.

No.

INDICTMENT  
**PENALTY SHEET**

**DANIELLE REGINA DIARBAKERLY**

**CHARGE: Money Laundering Conspiracy 18 U.S.C. § 1956(h)**

**Maximum penalty:** Not more than 20 years [18 U.S.C. § 1956(a)(1)]  
and/or a fine of either 1) not more than the greater of twice the gross gain or twice  
the gross loss or 2) \$250,000 whichever is greater [18 U.S.C. § 3571]

**Supervised Release:** Not more than three years  
[18 U.S.C. § 3583] (Class C Felony, 18 U.S.C. § 3559)

**Special Assessment:** [18 U.S.C. § 3013] \$100

**Restitution:** [Mandatory 18 U.S.C. § 3663A]

**FORFEITURE**

Date: January 13, 2025

/s/ Timothy VerHey  
Counsel for the United States

Submitted in accordance with Admin Order 17-MS-046