

AFFIDAVIT

STATE OF FLORIDA

IN THE COUNTY COURT

VS

LEE COUNTY

CHRISTOPHER EDWARD KANE
[REDACTED]

STATE OF FLORIDA

[IDENTIFIERS REDACTED]



Before me, a Notary Public in and for said Lee County, personally came Detective David Dietz, who, being duly sworn, deposes, and says that on the 7th, day of January, A.D. 2023, in the County aforesaid, one: Christopher Edward Kane did violate the laws of the State of Florida, to-wit:

**Scheme to Defraud (x3) 817.034(4)(a)(1)
Money Laundering (x3) 896.101(5)(c)**

An investigation by the Fort Myers Police Department case number 23-0057765 has revealed the following facts.

On June 5, 2023, the Fort Myers Police Department received a report from Sivakunar Raman [DOB REDACTED] Raman reported to Officer Warner and Officer Wells that Christopher Kane contracted with Raman to complete work at his home for eighty-five thousand dollars. Kane allegedly never completed any work. Officer Wells also contacted Sunil Lalla a neighbor of Raman who is also a victim. Lalla provided documentation of the alleged crime and was interviewed by Detective Dietz.

The investigation conducted by Detective Dietz revealed that Christopher Edward Kane received payment through Manuel Alejandro Cajigas for construction of cabinets and other woodwork for three separate victims. Cajigas's company, Cornerstone Home Solutions, would then install the cabinets and other woodwork in the homes. Cajigas met with the victims and then collected the payments. Kane was then paid by Cajigas for the completion of the cabinets and woodwork. Kane ultimately never completed any work and never delivered any materials.

A review of Kanes accounts it was found that Kane moved the payments through various business and personal accounts and ultimately into Crypto currency accounts in an attempt to launder the money. Kane stole over Three Hundred Eight Thousand Dollars (\$308,000.00) during the scheme to defraud. An exhausting search for Kane has been unsuccessful and Kane's whereabouts are unknown. Cajigas and Kane's former partner were interviewed and have not seen or heard from Kane in over a year as of the date of this report.

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Scheme to Defraud

- The following report will prove that Christopher Edward Kane engaged in a scheme to defraud.
- Christopher Edward Kane thereby obtained Three Hundred Eight Thousand Eight Hundred Twenty-Seven Dollars

Money Laundering

- The following report will prove that Christopher Edward Kane conducted multiple financial transactions.
- The money involved in the financial transactions represented the proceeds of theft through a scheme to defraud.
- Christopher Edward Kane knew the money involved in the financial transactions represented the proceeds of some form of unlawful activity.
- Christopher Edward Kane did so with the intent to promote the carrying on of the theft through scheme to defraud.
- Christopher Edward Kane Knew that the transaction was designed in whole or in part to disguise the source of the proceeds of the theft through scheme to defraud

Victim Dr. Sivakunar Raman

Detective Dietz met with Dr. Raman at the Fort Myers Police Department. Raman provided a recorded sworn statement.

Detective Dietz created two photo arrays, one with Manuel Cajigas in position number four and the other had Christopher Kane in position number two.

Detective Wood presented the photo arrays to Dr. Raman after reading the department's pre-printed instruction form. Dr. Raman identified Cajigas and Kane in each of the photo arrays. The photo arrays were submitted to the Evidence Division of the Fort Myers Police Department.

Dr. Raman said that he was introduced to Cajigas by Dr. Lalla who also was contracted with Cajigas and Kane to have work completed. Sivakunar said he does wish to press charges. For the full statement please refer to the audio recording.

Detective Dietz obtained bank records for Kane's accounts and the following was discovered.

- Dr. Raman met with Cajigas and Kane and wrote a check payable to Cornerstone Home Solutions which was owned by Manuel Cajigas, for eighty-five thousand dollars (\$85,000.00) check number 365 on March 02, 2023
- The check cleared on March 03, 2023
- March 14, 2023, Cajigas withdrew eighty-five thousand dollars (\$85,000.00) from his business account

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- March 14, 2023, Kane made an eighty-five thousand dollars (\$85,000.00) deposit into his personal account [REDACTED]
- The day Kane deposited the eighty-five thousand dollars (\$85,000) into his account the daily balance was twenty-one thousand two hundred seventy-four dollars (\$21,274)
- The same day March 14, 2023, Kane attempts to wire eighty thousand dollars (\$80,000.00) to his Crypto.com account. The wire did not go through
- March 16, 2023, Kane transferred eighty thousand dollars (\$80,000.00) into his Coinbase wallet
- March 17, 2023, the deposit cleared the Coinbase account and was available for transactions
- On March 17, 2023, at 8:55 pm Kane buys \$77,923.84 worth of Tether (USDT). Kane then immediately sells the Tether at 8:55 pm. The fees for all the transactions lowered the amount to \$76,100.73. Kane then initiates a withdrawal of the money and wires the money back into his personal bank account [REDACTED] After the transfer fee, the dollar amount received to the personal account was \$75,950.73
- March 20, 2023, Kane then wires \$78,000.00 from the personal account to Crypto.com
- March 20, 2023, Kane purchased Tether with the \$78,000.00 and moved the currency on the crypto chain which made multiple hops (based on the tracing of the hops some of the wallets that the cryptocurrency landed in were flagged as scams related to pig butchering, it appears that Kane was stealing money and sending to another person)
- The crypto took a couple of hops and is now sitting in two unknown cold wallets [WALLET ADDRESSES REDACTED]

Throughout the remaining days of March and April of 2023, Kane transferred small amounts of money from the personal account ranging between \$500.00 and one transfer of \$30,000.00 to the business account and then back into the personal account again to disguise the origin of the money. This was done to disguise (launder) the assets that Kane received to complete the work for Raman which was never done.

Sivakumar Raman paid Cornerstone Home Solutions, Inc. eighty-five thousand dollars (\$85,000.00) to have Christopher Kane produce new cabinets, flooring, and framing in Raman's home. Kane produced none of the material for Cornerstone Home Solutions, Inc. The money given to Kane was moved through multiple accounts in an attempt to hide the stolen funds by money laundering.

Victim Dr. Sunil N Lalla

Detective Dietz created two photo arrays. One with Manuel Cajigas in position number four and the other with Christopher Kane in position number two. Sunil N Lalla met with Detective Dietz at the Fort Myers Police Department and the photo arrays were presented to Lalla by Detective Amanda Averill. The entire encounter was captured by audio recording and uploaded to Evidence.com. This concluded Detective Averill's role in the investigation. Detective Averill did not know the identity of the defendant or the details of the case and had no investigative role in the case. The photo arrays were submitted to the property and evidence division of the Fort Myers Police Department.

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Lalla identified Manuel Cajigas located in position number four as the person who took his deposit and payment for cabinets. Lalla identified Christopher Kane located in position number two as the person who held his payment for the manufacturing of the cabinets.

Lalla provided an audio-recorded sworn statement, For the full context please refer to the full recording or the audio transcript. Cajigas was brokering the completion and installation of the cabinets for his home. Lalla said he does wish to press charges.

The following is what was Discovered from reviewing the bank records.

- On January 9, 2023, Lalla paid Cajigas hundred-thousand-dollar (\$100,000.00) with check #609, the check was deposited into the Cornerstone account
- On January 19, 2023, Cajigas paid Kane with a check to Kane's business account Benjamin Franklin LLC ninety thousand dollars (\$90,000.00) check #122 from Cornerstone Home Solutions account with BrightStar Credit Union
- The daily balance in Kane's business account before the check was deposited was twenty-one thousand eight hundred seventy-two dollars fifteen cents (\$21,872.15)
- January 20, 2023, Kane transfers seventy-eight thousand dollars from the business account to his personal account [REDACTED]
- January 20, 2023, Kane wires the seventy-eight thousand dollars (\$78,000.00) to his Crypto.com account
- January 23, 2023, the seventy-eight thousand dollars (\$78,000.00) clears the Crypto.com account and is released for use
- January 23, 2023, Kanes purchases seventy-eight thousand dollars (\$78,000.00) of Crypto and then sends seventy-four thousand one forty-one dollars on the crypto chain
- On March 26, 2023, Lalla wrote another check to Cornerstone Home Solutions for changes and upgrades requested for the job. The check totaled \$30,676.00 and was deposited by Cajigas into the Cornerstone Home Solutions business account and posted to the account on March 27, 2023.
- On March 27, 2023, Cajigas wired \$35,000.00 to the personal account of Kane ending in [REDACTED] which is located on the 25 page of the account statement. Cajigas said that this was the additional payment for the Lalla job.
- On March 28, 2023, Kane transferred \$30,000.00 from the account ending in [REDACTED] to Crypto.com.

Lalla stated that no work was performed, and Lalla had to hire a new contractor to do the job. Lalla called Cajigas and insisted on a refund, but Cajigas told Lalla that he had no money to refund because all the money was sent to Kane to purchase the cabinets and complete the job. This is supported by the bank records.

In conclusion, Lalla wrote two checks for work that would be completed at his home. One check for One hundred Thousand Dollars (\$100,000.00) and another for Thirty Thousand Six Hundred Seventy-Six Dollars (\$30,676.00) the money was paid to Cornerstone Home Solutions and then the money was paid to Kane. Kane then transferred the money to his personal account

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from his business account, Kane then wired the money to his Crypto.com account and then Kane would purchase cryptocurrency with the victim's money.

Victim Dr. Nagesh Babu Ravipati

Detective Dietz meet with Nagesh Ravipa [DOB REDACTED] another victim of Christopher Kane. Ravipati provided an audio-recorded sworn statement at the Fort Myers Police Department. Ravipati was introduced to Manuel Cajigas and began negotiations with Cajigas to have work completed at his home located at [RESIDENTIAL ADDRESS REDACTED] Ravipati met with Cajigas and Kane and a scope of work was created by Cajigas for a replacement of cabinets and countertops in Ravipati's home.

Ninety-three thousand one hundred fifty-one dollars (\$93,150.00) was due at signing.

- Ravipati obtained a cashier's check from FineMark National Bank on February 15, 2023, for the amount and gave the payment to Cajigas
- Cajigas deposited the payment into the Cornerstone Home Solutions account on February 16, 2023
- On February 21, 2023, Kane deposited check number 124 from Cornerstone Home Solutions for seventy-nine thousand dollars seven hundred two dollars (\$79,702.00) with "Ravipati Project" written in the memo line of the check into Benjamin Franklin LLC business account ending in [REDACTED]
- On February 22, 2023, Kane then transferred seventy thousand dollars (\$70,000) from the business account to his personal account ending in [REDACTED]
- On the same day February 22, 2023, Kane wires seventy thousand dollars (\$70,000) to Crypto.com

Kane never delivered any of the ordered products. Kane moves the money he was paid for the job through his business account to his personal account and then to a Crypto.com account.

No work was completed by Kane, no money was refunded to Ravipati and Ravipati had to hire a new contractor to do the work needed. Ravipati provided a copy of the Scope of Work and the cashier's check. Ravipati wishes to press charges against Kane. Ravipati was shown photo arrays with Cajigas and Kane and identified both in the photo arrays. Ravipati provided an audio recorded sworn statement and wishes to pursue criminal charges.

The following is what was discovered during the review of the bank records.

- Ravipati pays Cornerstone Home Solutions on February 15, 2023, with a FineMark cashier's check #027663 ninety-three thousand one hundred fifty dollars seventy-six cents (\$93,150.76)
- Cajigas deposits the cashier's check into his Brightstar Credit Union account [REDACTED]
- February 16, 2023, Cajigas pays Benjamin Franklin LLC seventy-nine thousand seven hundred two dollars (\$79,702.00) with check #124 for the "Ravipati Project"
- On February 21, 2023, check #124 is deposited into Kane's business account # [REDACTED]
- February 22, 2023, Kane transfers seventy thousand dollars (\$70,000.00) from the business account # [REDACTED] to his personal account # [REDACTED]
- The daily balance in the business account # [REDACTED] prior to the check for Ravipati clearing was eighteen thousand four hundred ten dollars eighty-one cents (\$18,410.81)