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U.S. DISTRICT COURT
DISTRICT OF NEBRASKA
2026 OCT 20 PM 4:01
OFFICE OF THE CLERK

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

FRANCIS MOGAMBI,

Defendant.

4:26CR3089

INDICTMENT
18 U.S.C. § 641
18 U.S.C. §§ 1028A(a)(1), and 2
18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461

The Grand Jury charges that

COUNT ONE

On or about February 3, 2026, in the District of Nebraska, the defendant, FRANCIS MOGAMBI, willfully and knowingly did embezzle, steal, purloin, and convert to his own use, an unlawfully obtained Federal Student Aid issued in the name of identity victim F.G., in the amount of $1,954.00, property of the United States.

In violation of 18 U.S.C. § 641.

COUNT TWO

On or about March 5, 2026, in the District of Nebraska, the defendant, FRANCIS MOGAMBI, willfully and knowingly did embezzle, steal, purloin, and convert to his own use, an unlawfully obtained Federal Student Aid issued in the name of identity victim B.M., in the amount of $2,452.90, property of the United States.

In violation of 18 U.S.C. § 641.

COUNT THREE

On or about March 16, 2026, in the District of Nebraska, the defendant, FRANCIS MOGAMBI, willfully and knowingly did embezzle, steal, purloin, and convert to his own use, an

unlawfully obtained Federal Student Aid issued in the name of identity victim Z.B., in the amount of $2,032.90, property of the United States.

In violation of 18 U.S.C. § 641.

COUNT FOUR

On or about April 6, 2026, in the District of Nebraska, the defendant, FRANCIS MOGAMBI, willfully and knowingly did embezzle, steal, purloin, and convert to his own use, an unlawfully obtained Federal Student Aid issued in the name of identity victim W.S., in the amount of $3,004.00, property of the United States.

In violation of 18 U.S.C. § 641.

COUNT FIVE

On or about May 5, 2026, in the District of Nebraska, the defendant, FRANCIS MOGAMBI, willfully and knowingly did embezzle, steal, purloin, and convert to his own use, an unlawfully obtained Federal Student Aid issued in the name of identity victim C.F., in the amount of $2,808.20, property of the United States.

In violation of 18 U.S.C. § 641.

COUNT SIX

Between on or about November 25, 2025, and February 3, 2026 in the District of Nebraska, and elsewhere, the defendant, FRANCIS MOGAMBI, aiding and abetting others both known and unknown to the grand jury and being aided and abetted by others both known and unknown to the grand jury, did knowingly transfer, possess, and use, without lawful authority, the means of identification of F.G., another person, knowing that the means of identification belonged to an actual person, during and in relation to an enumerated felony offense, to wit: Theft of Government Funds, in violation of 18 U.S.C. § 641, as charged in Count One of this Indictment.

In violation of Title 18, United States Code, Sections 1028A(a)(1), and 2.

COUNT SEVEN

Between on or about January 13, 2026 and March 5, 2026 in the District of Nebraska, and elsewhere, the defendant, FRANCIS MOGAMBI, aiding and abetting others both known and unknown to the grand jury and being aided and abetted by others both known and unknown to the grand jury, did knowingly transfer, possess, and use, without lawful authority, the means of identification of B.M., another person, knowing that the means of identification belonged to an actual person, during and in relation to an enumerated felony offense, to wit: Theft of Government Funds, in violation of 18 U.S.C. § 641, as charged in Count Two of this Indictment.

In violation of Title 18, United States Code, Sections 1028A(a)(1), and 2.

COUNT EIGHT

Between on or about February 6, 2026 and March 16, 2026 in the District of Nebraska, and elsewhere, the defendant, FRANCIS MOGAMBI, aiding and abetting others both known and unknown to the grand jury and being aided and abetted by others both known and unknown to the grand jury, did knowingly transfer, possess, and use, without lawful authority, the means of identification of Z.B., another person, knowing that the means of identification belonged to an actual person, during and in relation to an enumerated felony offense, to wit: Theft of Government Funds, in violation of 18 U.S.C. § 641, as charged in Count Three of this Indictment.

In violation of Title 18, United States Code, Sections 1028A(a)(1), and 2.

COUNT NINE

Between on or about March 3, 2026 and April 6, 2026 in the District of Nebraska, and elsewhere, the defendant, FRANCIS MOGAMBI, aiding and abetting others both known and unknown to the grand jury and being aided and abetted by others both known and unknown to the grand jury, did knowingly transfer, possess, and use, without lawful authority, the means of identification of W.S, another person, knowing that the means of identification belonged to an

actual person, during and in relation to an enumerated felony offense, to wit: Theft of Government Funds, in violation of 18 U.S.C. § 641, as charged in Count Four of this Indictment.

In violation of Title 18, United States Code, Sections 1028A(a)(1), and 2.

COUNT TEN

Between on or about March 18, 2026 and May 5, 2026 in the District of Nebraska, and elsewhere, the defendant, FRANCIS MOGAMBI, aiding and abetting others both known and unknown to the grand jury and being aided and abetted by others both known and unknown to the grand jury, did knowingly transfer, possess, and use, without lawful authority, the means of identification of C.F., another person, knowing that the means of identification belonged to an actual person, during and in relation to an enumerated felony offense, to wit: Theft of Government Funds, in violation of 18 U.S.C. § 641, as charged in Count Five of this Indictment.

In violation of Title 18, United States Code, Sections 1028A(a)(1), and 2.

FORFEITURE ALLEGATION

1. The allegations contained in Counts 1 through 5 of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461.

2. Upon conviction of the offenses in violation of Title 18, United States Code, Section 641 set forth in Counts 1 through 5 of this Indictment, the defendant, FRANCIS MOGAMBI, shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the offenses. The property to be forfeited includes, but is not limited to, the following: all cash proceeds; and a sum of money equal to the amount of proceeds obtained by defendant as a result of the offenses alleged in this Indictment, for which the defendant is personally liable.

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3. If any of the property described above, as a result of any act or omission of the defendant[s]:

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 Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461.

All pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461.

A TRUE BILL.

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FOREPERSON

The United States of America requests that trial of this case be held in Lincoln, Nebraska, pursuant to the rules of this Court.

UNITED STATES OF AMERICA, Plaintiff

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