

UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff,

v.

VIKY BOHRA,

Defendant.

No. CR20- 165 JLR

INFORMATION

**(Felony)**

18 U.S.C. § 1348

THE UNITED STATES ATTORNEY CHARGES THAT:

**COUNT 1**  
**Securities Fraud**  
**(Insider Trading)**

Beginning in or about January 2016 and continuing through and including July 2018, in Bothell, within the Western District of Washington, and elsewhere, defendant, VIKY BOHRA, knowingly and with intent to defraud, executed a scheme and artifice to defraud in connection with the publicly-traded securities of Amazon.com, Inc. as further described below.

**I. Background.**

1. Amazon.com, Inc. is a publicly-traded company headquartered in Seattle, Washington. Amazon is an issuer with a class of securities registered with the U.S. Securities and Exchange Commission under Section 12 of the Securities Exchange Act of

1 1934, 15 U.S.C. § 781. Amazon's securities were registered with the SEC throughout the  
2 relevant period. Amazon's common stock is listed on the NASDAQ Stock Market, a  
3 national exchange, under the symbol "AMZN."

4 2. Between on or about January 1, 2016 and October 2018, VIKY BOHRA  
5 was a resident of Bothell, Washington. Between December 2012 and October 2018,  
6 VIKY BOHRA's immediate relative (R) was employed in Amazon's finance department  
7 at Amazon's headquarters in Seattle, Washington. In R's job, R ultimately reported to  
8 Amazon's Chief Financial Officer. As part of R's responsibilities, R had access to the  
9 total revenue and expenses for each Amazon legal entity worldwide. By virtue of R's  
10 employment, R also had access to Amazon's other financial accounting information,  
11 including quarterly income statements. All of this internal financial accounting  
12 information constituted material, non-public information of Amazon.

## 13 **II. Summary of the Scheme.**

14 3. Beginning in January 2016, and continuing through July 2018, VIKY  
15 BOHRA fraudulently traded Amazon's stock and options in the time period preceding  
16 each of Amazon's public announcements of its earnings, namely Amazon's earnings for  
17 the fourth quarter (Q4) of 2015 through the second quarter (Q2) of 2018. When making  
18 these trades, VIKY BOHRA consulted with R, who provided R's opinion on Amazon's  
19 financial outlook and whether the transactions in Amazon securities were or were not  
20 advisable at the time. VIKY BOHRA, who was aware that R had access to Amazon's  
21 material, non-public financial accounting information, relied in part on the information R  
22 provided in making the above-referenced trades for each Amazon earnings announcement  
23 from Q4 2015 through Q2 of 2018. As a result of his fraudulent scheme, VIKY BOHRA  
24 obtained net profits of \$1,428,264.

## 25 **III. Manner and Means of the Scheme.**

26 4. It was a part of the scheme to defraud that, in the course of R's work in  
27 Amazon's finance department, R had access to Amazon's material, non-public financial  
28 accounting information, including the total revenue and total expenses for all of

1 Amazon's legal entities worldwide and Amazon's quarterly income statements. It was  
2 also a part of the scheme to defraud that, by virtue of R's position, R had a duty to keep  
3 confidential this material, non-public information.

4 5. By virtue of R's employment in Amazon's finance department, R was  
5 informed of, and acknowledged, Amazon's internal insider trading guidelines. Among  
6 other things, Amazon's guidelines prohibited R from: (1) trading in Amazon securities  
7 while in possession of material, non-public information; (2) passing Amazon's material,  
8 non-public information to others or recommending that others trade Amazon's securities  
9 based on material, non-public information; (3) trading in Amazon stock except during  
10 specified certain windows of time after the public announcement of Amazon's quarterly  
11 and annual earnings (the restricted period is referred to herein as "Amazon's blackout  
12 period"); and (4) trading in Amazon options without obtaining pre-clearance from  
13 Amazon's legal department.

14 6. VIKY BOHRA, by virtue of being R's immediate relative, was also subject  
15 to Amazon's trading restrictions set forth above. Specifically, VIKY BOHRA was  
16 prohibited from trading Amazon securities during Amazon's blackout period and from  
17 trading Amazon options without pre-clearance from Amazon's legal department.

18 7. It was also a part of the scheme to defraud that, contrary to these  
19 restrictions, VIKY BOHRA conducted or directed trades of Amazon stock and options in  
20 accounts held in his name and/or the accounts of other immediate family members during  
21 the Amazon blackout period preceding each of Amazon's public announcements of its  
22 earnings results for Q4 2015 through Q2 2018. For example, on July 27, 2017, VIKY  
23 BOHRA purchased, or directed the purchase of, approximately 100 Amazon put option  
24 contracts in his online brokerage account and the online brokerage account of an  
25 immediate family member. During the time period from January 2015 through July  
26 2018, VIKY BOHRA's prohibited trades in Amazon's securities resulted in a total profit  
27 of \$1,428,264 spread across the accounts described above.  
28



8. It was also a part of the scheme to defraud that, in conducting the Amazon trades set forth in paragraph 7, in addition to conducting financial analysis based on publicly available information, VIKY BOHRA also consulted with R, who, in violation of Amazon's insider trading guidelines, provided R's opinion on Amazon's financial outlook and whether the transactions in Amazon's stock and options were or were not advisable at that time. VIKY BOHRA relied in part on the information R provided in making the above trades for each Amazon earnings announcement from Q4 2015 through Q2 of 2018.

9. It was also a part of the scheme to defraud that, by relying in part on the material, non-public information provided by R in the quarters set forth above, VIKY BOHRA defrauded Amazon of its material, non-public financial information for the purpose of converting it to VIKY BOHRA's own use, and for the purpose of executing securities transactions in the stock and options of Amazon. These acts also constituted a scheme to defraud the counterparties in these illicit trades.

#### **IV. Execution of the Scheme.**

10. On July 27, 2017, in Bothell, Washington, within the Western District of Washington, and elsewhere, having devised and participated in the above described scheme and artifice, VIKY BOHRA, for the purpose of executing the above-described scheme and artifice, purchased, or directed the purchase of, approximately 100 put options contracts for Amazon.com, Inc. stock through his online brokerage account and the online brokerage account of an immediate family member.

All in violation of Title 18, United States Code, Section 1348.

#### **ASSET FORFEITURE ALLEGATION**

The allegations in Count 1 are hereby realleged and incorporated by reference for the purpose of alleging forfeiture. Upon conviction of the offense alleged in Count 1, the defendant VIKY BOHRA shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C), by way of Title 28, United States Code, Section 2461(c), any property that constitutes or is traceable to proceeds of the offense. This

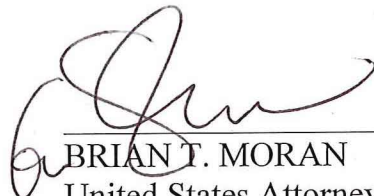
1 property includes but is not limited to a sum of money reflecting the proceeds the  
2 defendant obtained from the offense.

3 **Substitute Assets.** If any of the property described above, as a result of any act or  
4 omission of the defendant:

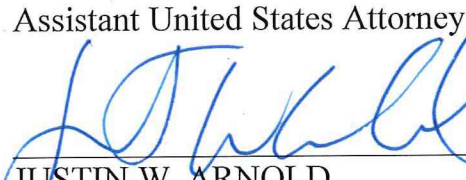
- 5 a. cannot be located upon the exercise of due diligence;  
6 b. has been transferred or sold to, or deposited with, a third party;  
7 c. has been placed beyond the jurisdiction of the court;  
8 d. has been substantially diminished in value; or,  
9 e. has been commingled with other property which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

11 it is the intent of the United States to seek the forfeiture of any other property of the  
12 defendant, up to the value of the above-described forfeitable property, pursuant to Title  
13 21, United States Code, Section 853(p).

14  
15 DATED: September 28, 2020

16  
17   
18 BRIAN T. MORAN  
United States Attorney

19  
20   
21 ANDREW C. FRIEDMAN  
Assistant United States Attorney

22  
23   
24 JUSTIN W. ARNOLD  
25 Assistant United States Attorney  
26  
27  
28