



CMX/2007R00453

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

UNITED STATES OF AMERICA

v.

**MOHAMMAD AHSAN,
a/k/a Mohammad Ashan,
a/k/a Chaudhry,
and
ABDUL REHMAN,
a/k/a Rahim,**

Defendants.

- * **Criminal No. MJG-07-0397**
- * **Conspiracy to Launder Monetary Instruments, 18 U.S.C. §§ 1956(h) and 1956(a)(3)(B); Operating an Unlicensed Money Transmission Business, 18 U.S.C. § 1960(a); Laundering of Monetary Instruments, 18 U.S.C. § 1956(a)(3)(B); Failure to File Currency Transaction Reports, 31 U.S.C. §§ 5313(a) and 5322(b), 31 C.F.R. §§ 103.22 and 103.27(a)(1); Aiding and Abetting, 18 U.S.C. § 2; Criminal Forfeiture, 18 U.S.C. § 982**

SUPERSEDING INDICTMENT

The Grand Jury for the District of Maryland charges that:

COUNT ONE

At all times relevant to this Indictment:

1. **MOHAMMAD AHSAN, a/k/a Mohammad Ashan, a/k/a Chaudhry** (hereinafter **MOHAMMAD AHSAN**), who was born in Pakistan and is a naturalized United States citizen, owned and operated Pak Exchange Services, a/k/a Pak Exchange (hereinafter Pak Exchange), located at 1937 14th Street, #201, in Washington, D.C.. Pak Exchange was in the business of receiving money from customers for the purpose of transferring, by any means, the money or its equivalent from the District of Columbia to points within and outside of the United States. Pak Exchange was authorized under the laws of the District of Columbia, specifically Title 26, D.C. Code, Section 26-1002, to conduct its money transmission business solely within the District of



Columbia as an authorized delegate of a California business called Maniflo Money Exchange, Inc.

MOHAMMAD AHSAN maintained a residence in Laurel, Maryland.

2. **ABDUL REHMAN, a/k/a Rahim** (hereinafter **ABDUL REHMAN**), was born in Pakistan. He resided in Belgium.

3. Pursuant to Title 18, United States Code, Section 1960(b)(1), it was illegal to conduct a money transmission business without an appropriate state license in a State where such unlicensed operation was punishable as a misdemeanor or felony under State law. Pursuant to Title 12, Maryland Code Annotated, Financial Institutions, Section 12-405, no person could engage within the State of Maryland in the business of receiving money for transmission to a location within or outside of the United States without first obtaining a state license. Every person who violated or failed to comply with this requirement was guilty of a crime punishable as a felony under State law, pursuant to Title 12, Maryland Code Annotated, Financial Institutions, Section 12-430. Neither **MOHAMMAD AHSAN** nor Pak Exchange were licensed to conduct a money transmission business within the State of Maryland.

4. A “hawala” was an informal money transfer system utilizing a network of persons and/or businesses to facilitate the transfer of monies across domestic and international borders without reliance upon conventional banking systems and regulations. Such transfers involved handing over monies to an individual in the United States, who, in turn, would arrange for the equivalent amount of monies, minus commissions, to be paid back outside of the United States to an individual, or financial account, as designated by the person seeking to have currency transferred.

5. Pursuant to Title 18, United States Code, Section 1956(c)(6), and Title 31, United States Code, Section 5312(a)(2), and regulations thereunder, specifically Title 31, Code of Federal



Regulations, Section 103.11(n), a domestic financial institution was defined as, among other things, a money services business, such as a licensed sender of money, or any other person engaging as a business in the transmission of funds, including any person engaging as a business in an informal money transfer system, or any network of people engaging as a business in facilitating the transfer of money domestically or internationally outside of the conventional financial institutions system. Pursuant to Title 31, United States Code, Section 5313(a), and regulations thereunder, specifically, Title 31, Code of Federal Regulations, Sections 103.22(a) and 103.27-103.28, such persons and businesses were required to prepare and file Currency Transaction Reports (hereinafter CTRs) to report cash transactions involving the payment, receipt, or transfer of over \$10,000 in United States currency. In order to complete the CTRs, the persons or businesses filing such reports would be required to verify and record the name and address of the person presenting the transaction, and the identity, account number and social security or taxpayer identification number, if any, of the person or entity on whose behalf the transaction was to be effected.

6. Pursuant to Title 31, United States Code, Section 5313(g), and regulations thereunder, specifically Title 31, Code of Federal Regulations, Section 103.20, a money transmitter was required to file a report (otherwise known as a Suspicious Activity Report or SAR) in instances where the money transmitter knew, suspected, or had reason to suspect that a transaction, or pattern of transactions, of at least \$2,000, involved funds derived from illegal activity, or was conducted to hide or disguise such funds.

7. Afridi Services, a/k/a Afridi Trading, Inc., and Aswan, Inc. (“Aswan”) (hereinafter Afridi Services and Aswan) were fake import/export companies utilized by an individual acting in an undercover capacity under the supervision of law enforcement agents with United States



Immigration and Customs Enforcement (ICE) and the Federal Bureau of Investigation (FBI). At the direction of the ICE and FBI agents, this individual (hereinafter “cooperating witness”) represented himself to be involved in numerous illegal activities, including: large-scale international drug trafficking, and international smuggling of counterfeit cigarettes and other goods, including weapons. 8. Pursuant to Title 18, United States Code, Section 1956(a), it was illegal to conduct a financial transaction with property represented to be proceeds of specified unlawful activity, or represented to be used to conduct or facilitate specified unlawful activity. Specified unlawful activity included, among other acts: drug trafficking in violation of Title 21, United States Code, Section 841. Both ICE and the FBI are authorized to investigate violations of the federal money laundering statute set forth in Title 18, United States Code, Section 1956.

The Charge

9. Beginning in or about November 2004, and continuing through on or about March 22, 2007, within the State and District of Maryland, the District of Columbia, Canada, England, Spain, Pakistan, the Netherlands, and elsewhere,

**MOHAMMAD AHSAN,
a/k/a Mohammad Ashan,
a/k/a Chaudhry,
and
ABDUL REHMAN,
a/k/a Rahim,**

defendants herein, did knowingly and intentionally combine, conspire, confederate, and agree with each other, and with persons known and unknown to the Grand Jury, to knowingly and willfully conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce involving property represented by an individual acting at the direction, and with the approval, of a



Federal official authorized to investigate violations of Title 18, United States Code, Section 1956, to be the proceeds of specified unlawful activity and property used to conduct and facilitate such activity, to wit, drug trafficking in violation of Title 21, United States Code, Section 841, with the intent to conceal and disguise the nature, location, source, ownership and control of property believed to be the proceeds of specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(3)(B).

Manner and Means of the Conspiracy

10. Among the means and methods by which the defendants and their associates conducted and participated in the conspiracy were the following:

a. The defendants would move large quantities of United States currency received from a cooperating witness in the United States to foreign accounts or locations via the “hawala” method of currency transfer. The cooperating witness represented the monies to be proceeds of, and related to his illegal drug trafficking. **MOHAMMAD AHSAN** was the primary point of contact for the cooperating witness. **MOHAMMAD AHSAN** would receive currency from the cooperating witness at his residence in Laurel, Maryland.

b. Following the receipt of monies from the cooperating witness, **MOHAMMAD AHSAN** would make arrangements for the equivalent amount of monies, minus commissions, to be deposited into a foreign bank account designated by the cooperating witness, or be delivered outside of the United States to the cooperating witness or his designated representative. In those instances where deposits of currency were to be made into a foreign bank account designated by the cooperating witness, **MOHAMMAD AHSAN** relied upon associates to arrange for the deposits into the foreign account in discreet intervals in a manner designed to avoid detection



by law enforcement.

c. Members of the conspiracy would utilize coded language when speaking to each other and to the cooperating witness regarding the transfer of monies. **MOHAMMAD AHSAN** would provide the cooperating witness with coded contact information for his associates abroad that included numbers and other identifying information on dollar bills. **MOHAMMAD AHSAN** directed the cooperating witness to provide the information to these foreign associates, such as **ABDUL REHMAN** and others in Canada, England, Spain, Pakistan, and the Netherlands, upon meeting with them abroad. **ABDUL REHMAN** and others would then provide the cooperating witness, or his designated representative, an amount of money equivalent to the amount of United States currency initially given to **MOHAMMAD AHSAN** by the cooperating witness, minus the fees charged by **MOHAMMAD AHSAN** and his coconspirators.

d. In return for conducting the money transfers, **MOHAMMAD AHSAN** would automatically subtract and keep a commission of approximately five percent of the amount of currency sought to be transferred on each occasion by the cooperating witness. Other members of the conspiracy would subtract and keep an additional commission of a minimum of approximately three to five percent of the transaction.

e. As a further means by which to conceal the hawala transfers of monies received from the cooperating witness, **MOHAMMAD AHSAN** failed to file SARs or CTRs that would have reflected his receipt from the cooperating witness of approximately \$520,000 in United States currency, in amounts ranging from \$20,000 to \$200,000, represented by the cooperating witness to be the proceeds of, derived from, or involved in specified unlawful activity.

Overt Acts



11. In furtherance of the conspiracy, and to effect its object of generating monies and profits for its members, the defendants and other members of the conspiracy did perform, participate in, and commit the following acts, among others:

(1) On or about July 28, 2005, at his residence in Laurel, Maryland, **MOHAMMAD AHSAN** accepted \$20,000 in United States currency from a cooperating witness for a hawala transaction involving a hand-to-hand transfer of cash in Pakistan.

(2) On or about August 3, 2005, at a location in Pakistan, an individual working at the direction of **MOHAMMAD AHSAN** gave the designated representative of a cooperating witness a quantity of hawala currency, specifically 1,148,500 in Pakistani rupees.

(3) On or about October 19, 2005, at his residence in Laurel, Maryland, **MOHAMMAD AHSAN** accepted \$50,000 in U.S. currency from a cooperating witness for a hawala transaction involving a hand-to-hand transfer of cash in London, England.

(4) On or about November 2, 2005, at a location in London, England, an individual acting at the direction of **MOHAMMAD AHSAN** gave the designated representative of a cooperating witness a quantity of hawala currency, specifically £25,940 in British pounds sterling.

(5) On or about January 19, 2006, at his residence in Laurel, Maryland, **MOHAMMAD AHSAN** accepted \$150,000 in U.S. currency from a cooperating witness for a hawala transaction involving a hand-to-hand transfer of cash in Spain.

(6) On or about February 28, 2006, at his residence in Laurel, Maryland, **MOHAMMAD AHSAN** returned \$89,000 in U.S. currency to a cooperating witness, which represented a portion of the monies remaining from an attempted hawala transaction originating on or about January 19, 2006.



(7) On or about March 8, 2006, at the Pak Exchange office in Washington, D.C., **MOHAMMAD AHSAN** returned \$60,000 in U.S. currency to a cooperating witness, which represented a portion of the monies remaining from an attempted hawala transaction originating on or about January 19, 2006.

(8) On or about April 13, 2006, at his residence in Laurel, Maryland, **MOHAMMAD AHSAN** returned \$1,000 in U.S. currency to a cooperating witness, which represented the monies remaining from an attempted hawala transaction originating on or about January 19, 2006.

(9) On or about April 13, 2006, at his residence in Laurel, Maryland, **MOHAMMAD AHSAN** accepted \$200,000 in U.S. currency from a cooperating witness for a hawala transaction involving a hand-to-hand transfer of cash in the Netherlands.

(10) On or about May 3, 2006, at a location in Amsterdam, Netherlands, **ABDUL REHMAN** gave a cooperating witness a quantity of hawala currency, specifically €135,770 in Euros.

(11) On or about September 14, 2006, at his residence in Laurel, Maryland, **MOHAMMAD AHSAN** accepted \$100,000 in U.S. currency from a cooperating witness for a hawala transaction involving deposit of monies into a bank account in Canada.

(12) On or about September 29, 2006, an individual in Canada acting at the direction of **MOHAMMAD AHSAN** coordinated the deposit, at a branch office of the Royal Bank of Canada, of \$23,000 in U.S. currency into a bank account designated by a cooperating witness.

(13) On or about October 2, 2006, an individual in Canada acting at the direction of **MOHAMMAD AHSAN** coordinated the deposit, at a branch office of the Royal Bank of



Canada, of \$7,000 in U.S. currency into a bank account designated by a cooperating witness.

(14) On or about October 6, 2006, an individual acting in Canada at the direction of **MOHAMMAD AHSAN** coordinated the deposit, at a branch office of the Royal Bank of Canada, of \$8,000 in U.S. currency into a bank account designated by a cooperating witness.

(15) On or about October 12, 2006, an individual in Canada acting at the direction of **MOHAMMAD AHSAN** coordinated the deposit, at a branch office of the Royal Bank of Canada, of \$7,900 in U.S. currency into a bank account designated by a cooperating witness.

(16) On or about October 18, 2006, an individual in Canada acting at the direction of **MOHAMMAD AHSAN** coordinated the deposit, at a branch office of the Royal Bank of Canada, of \$8,100 in U.S. currency into a bank account designated by a cooperating witness.

(17) On or about October 25, 2006, an individual in Canada acting at the direction of **MOHAMMAD AHSAN** coordinated the deposit, at a branch office of the Royal Bank of Canada, of \$6,300 in U.S. currency into a bank account designated by a cooperating witness.

(18) On or about October 31, 2006, an individual in Canada acting at the direction of **MOHAMMAD AHSAN** coordinated the deposit, at a branch office of the Royal Bank of Canada, of \$8,200 in U.S. currency into a bank account designated by a cooperating witness.

(19) On or about November 3, 2006, an individual in Canada acting at the direction of **MOHAMMAD AHSAN** coordinated the deposit, at a branch office of the Royal Bank of Canada, of \$13,500 in U.S. currency into a bank account designated by a cooperating witness.

(20) On or about November 14, 2006, at his residence in Laurel, Maryland, **MOHAMMAD AHSAN** returned \$2,000 in U.S. currency to a cooperating witness, which represented a refund of the commission and fees kept by **MOHAMMAD AHSAN** and his associate



in Canada for the hawala transaction originating on or about September 14, 2006.

18 U.S.C. § 1956(h)

18 U.S.C. § 1956(a)(3)(B)

18 U.S.C. § 1956(c)(7)



COUNT TWO

1. The allegations set forth in paragraphs 1 through 8, 10 and 11 of Count One of this Indictment are realleged and incorporated by reference as though fully set forth herein.

2. Beginning in or about July 2005, and continuing through in or about March 22, 2007, in the State and District of Maryland,

**MOHAMMAD AHSAN,
a/k/a Mohammad Ashan,
a/k/a Chaudhry,**

a defendant herein, did knowingly conduct, control, manage, supervise, direct and own all or part of an unlicensed money transmitting business, which affected interstate and foreign commerce in any manner and degree, and which was operated without an appropriate money transmitting license in the State of Maryland, where such operation was punishable as a felony under State law, whether or not the defendant knew that the operation was required to be licensed and that the operation was so punishable.

18 U.S.C. § 1960(a)
18 U.S.C. § 1960(b)(1)(A)
18 U.S.C. § 2



COUNTS THREE THROUGH SEVEN

1. The allegations set forth in paragraphs 1 through 8, 10 and 11 of Count One of this Indictment are realleged and incorporated by reference as though fully set forth herein.

2. On or about the dates set forth below, in the State and District of Maryland, the defendants as named below, did knowingly and willfully conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce involving property represented by an individual acting at the direction, and with the approval, of a Federal official authorized to investigate violations of Title 18, United States Code, Section 1956, to be the proceeds of specified unlawful activity and property used to conduct and facilitate such activity, to wit, drug trafficking in violation of Title 21, United States Code, Section 841, with the intent to conceal and disguise the nature, location, source, ownership and control of property believed to be the proceeds of specified unlawful activity.

Count	Dates	Defendant(s)	Amount of Funds	Locations of Fund Transfers
3	July 28 through August 3, 2005	MOHAMMAD AHSAN a/k/a Mohammad Ashan, a/k/a Chaudhry	\$20,000	Pakistan
4	October 19 through November 2, 2005	MOHAMMAD AHSAN, a/k/a Mohammad Ashan, a/k/a Chaudhry	\$50,000	London, England
5	January 19 through April 13, 2006	MOHAMMAD AHSAN, a/k/a Mohammad Ashan, a/k/a Chaudhry	\$150,000	Spain



Count	Dates	Defendant(s)	Amount of Funds	Locations of Fund Transfers
6	April 13 through May 3, 2006	MOHAMMAD AHSAN, a/k/a Mohammad Ashan, a/k/a Chaudhry, ABDUL REHMAN a/k/a Rahim	\$200,000	Amsterdam, Netherlands
7	September 14 through November 14, 2006	MOHAMMAD AHSAN a/k/a Mohammad Ashan, a/k/a Chaudhry	\$100,000	Canada

18 U.S.C. § 1956(a)(3)(B)

18 U.S.C. § 1956(c)(7)

18 U.S.C. § 2



COUNTS EIGHT THROUGH TWELVE

1. The allegations set forth in paragraphs 1 through 8, 10 and 11 of Count One of this Indictment are realleged and incorporated by reference as though fully set forth herein.

2. On or about the dates set forth below, in the State and District of Maryland,

**MOHAMMAD AHSAN,
a/k/a Mohamad Ashan
a/k/a Chaudhry,**

a defendant herein, acting as a financial institution as defined in Title 31, United States Code, Section 5312(a)(2)(R), and Title 31, Code of Federal Regulations, Sections 103.11(n)(3) and (uu)(5), did knowingly and willfully fail to file a Currency Transaction Report, as required by Section 5313(a) of Title 31, United States Code, and the regulations promulgated thereunder, specifically, Title 31, Code of Federal Regulations, Sections 103.22(a)(1), 103.22(b)(1) and 103.27(a)(1), and did so as part of a pattern of illegal activity involving more than \$100,000 in a 12-month period.

Count	Dates	Amount of Funds
8	July 28, 2005	\$20,000
9	October 19, 2005	\$50,000
10	January 19, 2006	\$150,000
11	April 13, 2006	\$200,000
12	September 14, 2006	\$100,000

31 U.S.C. § 5313(a)
31 U.S.C. § 5322(b)
31 C.F.R. § 103.22
31 C.F.R. § 103.27 (a)(1)
18 U.S.C. § 2



FORFEITURE ALLEGATION

1. The allegations of this Indictment as contained in Counts One through Seven are realleged and incorporated herein for the purpose of alleging forfeitures to the United States of America pursuant to the provisions of Title 18, United States Code, Section 982(a)(1).

2. As a result of the offenses set forth in Counts One through Seven,

**MOHAMMAD AHSAN,
a/k/a Mohammad Ashan,
a/k/a Chaudhry,
and
ABDUL REHMAN,
a/k/a Rahim,**

shall forfeit to the United States all property, real and personal, constituting, or derived from, any proceeds said defendants obtained, directly or indirectly, as a result of the aforesaid offenses; all property, real and personal, used or intended to be used in any manner or part, to commit and to facilitate the commission of the violations alleged in this Indictment; and all property, real and personal, involved in the commission of the violations alleged in this Indictment, and traceable to such property, including, but not limited to:

a. \$520,000.00 in United States currency, and all interest and proceeds traceable thereto, in that such sum, in aggregate, is property which was involved in the aforesaid offenses, or is traceable to such property, in violation of Title 18, United States Code, Sections 982(a)(1), 1956(a)(3)(B), 1956(h) and 1960(a).

3. If any such property described above as being subject to forfeiture, as a result of any act or omission of the defendants -

a. cannot be located upon the exercise of due diligence;



- b. has been transferred or sold to, or deposited with, a third person;
- 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;

it is the intent of the United States, pursuant to Title 18, United States Code, Section 982(a)(1), to seek forfeiture of any other property of said defendants up to the value of the forfeitable property, that is, \$520,000.00.

18 U.S.C. § 982(a)(1)

Rod J. Rosenstein
United States Attorney

A TRUE BILL:

Foreperson

Date