



IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

UNITED STATES OF AMERICA
v.
SAIFULLAH ANJUM RANJHA,
MUHAMMAD RIAZ SAQI,
IMDAD ULLAH RANJHA,
MAZHAR IQBAL CHUGHTAI,
ANAR MUHAMMAD,
a/k/a Akthar Ali,
PARVEZ MEHMOOD SANDHU,
HAMZA, INC.,
d/b/a Pak American Money Transfer,
Defendants.

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* Criminal No. MJG-07-0239
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* Conspiracy to Launder Monetary
* Instruments, 18 U.S.C. §§ 1956(h) and
* 1956(a)(3)(B); Concealment of Terrorist
* Financing, 18 U.S.C. §§ 2339C(c)(1)(A)
* and 2339C(c)(2)(A); 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(b)(1) and
* 103.27(b)(2); Aiding and Abetting, 18
* U.S.C. § 2; Criminal Forfeiture, 18 U.S.C.
* § 982

SECOND SUPERSEDING INDICTMENT

The Grand Jury for the District of Maryland charges that:

COUNT ONE

At all times relevant to this Indictment:

1. SAIFULLAH ANJUM RANJHA (hereinafter SAIFULLAH RANJHA) conducted a business in Washington, D.C., known as HAMZA, INC., d/b/a Pak American Money Transfer (hereinafter HAMZA), which engaged 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. HAMZA was licensed, as required by the law 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. SAIFULLAH RANJHA, who was



born in Pakistan and is a lawful permanent resident of the United States, was designated as the “Person In Charge” of **HAMZA**, and was responsible for the overall management and operation of the business. **SAIFULLAH RANJHA** maintained a residence at the **HAMZA** office at 249 11th Street, N.E., 2nd Floor (also referred to as 800 C Street, N.E., 2nd Floor) in Washington, D.C. He also resided in Laurel, Maryland.

2. **MUHAMMAD RIAZ SAQI** (hereinafter **MUHAMMAD SAQI**) was born in Pakistan. He resided in Washington, D.C., and was an office manager at **HAMZA**.

3. **IMDAD ULLAH RANJHA** (hereinafter **IMDAD RANJHA**) was born in Pakistan and is a lawful permanent resident of the United States. He resided in Glen Burnie, Maryland, and Washington, D.C. **IMDAD RANJHA** was the Corporate Vice President of **HAMZA**.

4. **MAZHAR IQBAL CHUGHTAI** (hereinafter **MAZHAR CHUGHTAI**) was born in Pakistan and resided in Montreal, Canada. **MAZHAR CHUGHTAI** conducted money transactions in Montreal under the business name of Pak Exchange Services. He was also involved in a money transmission business in Montreal, Canada, called Pak Canadian Foreign Exchange that was owned by his brother.

5. **ANAR MUHAMMAD, a/k/a Akthar Ali** (hereinafter **ANAR MUHAMMAD**), was born in Pakistan and resided in Barcelona, Spain.

6. **PARVEZ MEHMOOD SANDHU** (hereinafter **PARVEZ SANDHU**) was born in Pakistan and resided in Madrid, Spain.

7. 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 **HAMZA**, nor its officers, managers, key shareholders, or authorized delegates, were licensed to conduct a money transmission business within the State of Maryland.

8. 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.

9. 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.

10. 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.

11. **HAMZA** required that certain procedures, set forth in a written document titled “Anti-Money Laundering Policies and Programs,” be followed by its employees. These procedures required, among other things, that employees be vigilant in scrutinizing the true nature and legitimacy of their customers’ transactions, and that all customers open informational accounts with government issued identification. In the case of transactions over \$10,000, **HAMZA** procedure required that customers provide a social security number, business/occupation information, date of birth, and on whose behalf their transactions were being conducted. **HAMZA** procedure also required that records of all transactions, including copies of CTRs, SARs, and other supporting documents, be maintained for a period of five years.

12. On October 8, 1999, al Qaeda, an international terrorist group dedicated to opposing



non-Islamic governments with force and violence, was designated by the Secretary of State as a foreign terrorist organization pursuant to Section 219 of the Immigration and Nationality Act. It has continued to be designated as such since that time. In 1998, al Qaeda's main founder, Usama bin Laden, declared a jihad, or holy war, against the United States and its citizens, which he has carried out through al Qaeda and its affiliated organizations.

13. Afridi Services, a/k/a Afridi Trading, Inc. (hereinafter "Afridi Services"), was a fake import/export company 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: international smuggling of counterfeit cigarettes and other goods and contraband, including weapons; large-scale international drug trafficking; and providing assistance and financing to members of al Qaeda and its affiliated organizations and their operatives.

14. 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; concealment of terrorist financing in violation of Title 18, United States Code, Section 2339C; and trafficking in contraband cigarettes in violation of Title 18, United States Code, Section 2342. 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



15. Beginning in or about October 2003, and continuing through on or about the date of this Superseding Indictment, within the State and District of Maryland, the District of Columbia, Canada, England, Spain, Pakistan, Australia, and elsewhere,

**SAIFULLAH ANJUM RANJHA,
MUHAMMAD RIAZ SAQI,
IMDAD ULLAH RANJHA,
MAZHAR IQBAL CHUGHTAI,
ANAR MUHAMMAD, a/k/a Akthar Ali,
PARVEZ MEHMOOD SANDHU,**

and

HAMZA, INC., d/b/a Pak American Money Transfer,

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; concealment of terrorist financing in violation of Title 18, United States Code, Section 2339C; and trafficking in contraband cigarettes in violation of Title 18, United States Code, Section 2342; 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

16. 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 to foreign accounts or locations via the “hawala” method of currency transfer. The cooperating witness represented the monies to be proceeds of, or related to, illegal activities including, among other things, drug trafficking, terrorist financing, and trafficking in contraband cigarettes. **SAIFULLAH RANJHA** was the primary point of contact for the cooperating witness. **SAIFULLAH RANJHA, MUHAMMAD SAQI** and **IMDAD RANJHA** would receive monies from the cooperating witness at locations in Laurel, Maryland, and in a few instances, at the **HAMZA** office in Washington, D.C.

b. Following the receipt of monies from the cooperating witness, **SAIFULLAH RANJHA** and his coconspirators would make arrangements for the equivalent amount of monies, minus commissions, to be deposited into foreign bank accounts designated by the cooperating witness, or be delivered outside of the United States to the cooperating witness or his designated representative. In return for conducting the money transfers, **SAIFULLAH RANJHA** 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 between three to five percent of the transaction.

c. In those instances where deposits of currency were to be made into foreign bank accounts designated by the cooperating witness, **SAIFULLAH RANJHA** would rely primarily on **MAZHAR CHUGHTAI** in Canada, in addition to other foreign associates, to arrange for the deposits into those accounts. In many instances, **MAZHAR CHUGHTAI** and other members of



the conspiracy structured the deposits into the designated foreign accounts in amounts under \$10,000. In so doing, members of the conspiracy would avoid triggering a filing by the foreign financial institutions of the foreign equivalent of a CTR, and thus, avoid detection by law enforcement.

d. Members of the conspiracy would utilize coded language when speaking to each other and to the cooperating witness regarding the transfer of monies. **SAIFULLAH RANJHA** would provide the cooperating witness with coded contact information for his associates abroad that included numbers and other identifying information on dollar bills. **SAIFULLAH RANJHA** directed the cooperating witness to provide the information or dollar bills to these foreign associates, such as **ANAR MUHAMMAD** and **PARVEZ SANDHU**, and others in Canada, England, Spain, Pakistan, and Australia, upon meeting with them abroad. **MUHAMMAD, SANDHU** 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 **SAIFULLAH RANJHA** by the cooperating witness, minus the fees charged by **SAIFULLAH RANJHA** and his coconspirators.

e. As a means by which to conceal the hawala transfers of monies received from the cooperating witness, **SAIFULLAH RANJHA** and other members of the conspiracy failed to file SARs or CTRs that would have reflected receipt from the cooperating witness of approximately \$2,208,000 in United States currency in amounts ranging from \$13,000 to \$300,000 represented by the cooperating witness to be the proceeds of, derived from, or involved in specified unlawful activities.

Overt Acts



17. 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 January 20, 2004, at a location in Laurel, Maryland, **SAIFULLAH RANJHA** accepted \$13,000 in United States currency from a cooperating witness for a hawala transaction involving deposit of monies into a bank account in Canada.

(2) On or about January 22, 2004, **SAIFULLAH RANJHA** and **MAZHAR CHUGHTAI** coordinated five separate deposits totaling 14,945 Canadian dollars into a bank account in Canada designated by a cooperating witness, which deposits were made at different Canadian branch offices of the National Bank of Canada in the amounts of 3,000, 4,000, 2,995, 2,350, and 2,600 Canadian dollars.

(3) On or about February 5, 2004, at a location in Laurel, Maryland, **SAIFULLAH RANJHA** accepted \$50,000 in United States currency from a cooperating witness for a hawala transaction involving deposit of monies into a bank account in Canada.

(4) On or about February 6, 2004, **SAIFULLAH RANJHA** and **MAZHAR CHUGHTAI** coordinated four separate deposits totaling 20,000 Canadian dollars into a bank account in Canada designated by a cooperating witness, which were made at different Canadian branch offices of the National Bank of Canada each in the amount of 5,000 Canadian dollars.

(5) On or about February 12, 2004, **SAIFULLAH RANJHA** and **MAZHAR CHUGHTAI** coordinated three separate deposits totaling 10,700 Canadian dollars into a bank account in Canada designated by a cooperating witness, which were made at different Canadian branch offices of the National Bank of Canada in the amounts of 5,100, 2,700, and 2,900 Canadian



dollars.

(6) On or about February 13, 2004, **SAIFULLAH RANJHA** and **MAZHAR CHUGHTAI** coordinated two separate deposits totaling 6,150 Canadian dollars into a bank account in Canada designated by a cooperating witness, which were made at different Canadian branch offices of the National Bank of Canada in the amounts of 3,230 and 2,920 Canadian dollars.

(7) On or about February 16, 2004, **SAIFULLAH RANJHA** and **MAZHAR CHUGHTAI** coordinated the deposit of 2,955 Canadian dollars into a bank account in Canada designated by a cooperating witness, which was made at a Canadian branch office of the National Bank of Canada.

(8) On or about February 17, 2004, **SAIFULLAH RANJHA** and **MAZHAR CHUGHTAI** coordinated the deposit of 4,960 Canadian dollars into a bank account in Canada designated by a cooperating witness, which was made at a Canadian branch office of the National Bank of Canada.

(9) On or about February 18, 2004, **SAIFULLAH RANJHA** and **MAZHAR CHUGHTAI** coordinated two separate deposits totaling 10,525 Canadian dollars into a bank account in Canada designated by a cooperating witness, which were made at different Canadian branch offices of the National Bank of Canada in the amounts of 5,805 and 4,720 Canadian dollars.

(10) On or about February 19, 2004, **SAIFULLAH RANJHA** and **MAZHAR CHUGHTAI** coordinated the deposit of 3,135 Canadian into a bank account in Canada designated by a cooperating witness, which was made at a Canadian branch office of the National Bank of Canada.

(11) On or about March 22, 2004, at a location in Laurel, Maryland, **SAIFULLAH**



RANJHA accepted \$100,000 in United States currency from a cooperating witness for a hawala transaction involving a hand-to-hand transfer of cash in Canada and subsequent deposit of monies into a Canadian bank account.

(12) On or about March 24, 2004, at a location in Montreal, Canada, **MAZHAR CHUGHTAI** gave the designated representative of a cooperating witness a quantity of hawala currency, specifically 83,980 in Canadian dollars.

(13) On or about April 1, 2004, **SAIFULLAH RANJHA** and **MAZHAR CHUGHTAI** coordinated three separate deposits totaling 15,050 Canadian dollars into a bank account in Canada designated by a cooperating witness, which were made at different Canadian branch offices of the National Bank of Canada in the amounts of 4,010, 5,960 and 5,080 Canadian dollars.

(14) On or about April 2, 2004, **SAIFULLAH RANJHA** and **MAZHAR CHUGHTAI** coordinated three separate deposits totaling 12,800 Canadian dollars into a bank account in Canada designated by a cooperating witness, which were made at different Canadian branch offices of the National Bank of Canada in the amounts of 3,520, 4,280 and 5,000 Canadian dollars.

(15) On or about April 5, 2004, **SAIFULLAH RANJHA** and **MAZHAR CHUGHTAI** coordinated the deposit of 5,000 Canadian dollars into a bank account in Canada designated by a cooperating witness, which was made at a Canadian branch office of the National Bank of Canada.

(16) On or about May 5, 2004, at a location in Laurel, Maryland, **SAIFULLAH RANJHA** accepted \$100,000 in United States currency from a cooperating witness for a hawala



transaction involving deposit of monies into a bank account in Japan.

(17) On or about May 10, 2004, **SAIFULLAH RANJHA** and **MAZHAR CHUGHTAI** coordinated the deposit of \$20,985 in U.S. currency into a bank account in Japan designated by a cooperating witness, which was made by a wire transfer through the Bank of Montreal initiated by Pak Canadian Foreign Exchange in Canada.

(18) On or about May 13, 2004, **SAIFULLAH RANJHA** and **MAZHAR CHUGHTAI** coordinated the deposit of \$38,985 in U.S. currency into a bank account in Japan designated by a cooperating witness, which was made by a wire transfer through the Bank of Montreal initiated by Pak Canadian Foreign Exchange in Canada.

(19) On or about May 14, 2004, **SAIFULLAH RANJHA** and **MAZHAR CHUGHTAI** coordinated the deposit of \$17,000 in U.S. currency into a bank account in Japan designated by a cooperating witness, which was made by a wire transfer through the Royal Bank of Canada initiated by Pak Exchange Services in Canada.

(20) On or about May 17, 2004, **SAIFULLAH RANJHA** and **MAZHAR CHUGHTAI** coordinated the deposit of \$14,985 in U.S. currency into a bank account in Japan designated by a cooperating witness, which was made by a wire transfer through the Bank of Montreal initiated by Pak Canadian Foreign Exchange in Canada.

(21) On or about June 22, 2004, at a location in Laurel, Maryland, **SAIFULLAH RANJHA** accepted \$280,000 in United States currency from a cooperating witness for a hawala transaction involving a hand-to-hand transfer of cash in London, England.

(22) On or about July 2, 2004, at a location in London, England, an individual acting at the direction of **SAIFULLAH RANJHA** gave the designated representative of a



cooperating witness a quantity of hawala currency, specifically £138,670 in British pounds sterling.

(23) On or about August 19, 2004, at a location in Laurel, Maryland, **SAIFULLAH RANJHA** accepted \$100,000 in United States currency from a cooperating witness for a hawala transaction involving deposit of monies into a bank account in Japan.

(24) On or about August 23, 2004, **SAIFULLAH RANJHA** and **MAZHAR CHUGHTAI** coordinated the deposit of \$25,485 in U.S. currency into a bank account in Japan designated by a cooperating witness, which was completed by a wire transfer through the Bank of Montreal initiated by Pak Canadian Foreign Exchange in Canada.

(25) On or about August 25, 2004, **SAIFULLAH RANJHA** and **MAZHAR CHUGHTAI** coordinated the deposit of \$24,985 in U.S. currency into a bank account in Japan designated by a cooperating witness, which was made by a wire transfer through the Bank of Montreal initiated by Pak Canadian Foreign Exchange in Canada.

(26) On or about August 31, 2004, **SAIFULLAH RANJHA** and **MAZHAR CHUGHTAI** coordinated the deposit of \$14,980 in U.S. currency into a bank account in Japan designated by a cooperating witness, which was made by a wire transfer through a Canadian financial institution, La Caisse Centrale Desjardins, initiated by Pak Exchange Services in Canada.

(27) On or about August 31, 2004, **SAIFULLAH RANJHA** and **MAZHAR CHUGHTAI** coordinated the deposit of \$26,485 in U.S. currency into a bank account in Japan designated by a cooperating witness, which was made by a wire transfer through the Bank of Montreal initiated by Pak Canadian Foreign Exchange in Canada.

(28) On or about September 3, 2004, at a location in Laurel, Maryland, **SAIFULLAH RANJHA** returned \$1,000 in United States currency to a cooperating witness, which



represented monies missing from a hand-to-hand transfer of hawala currency that took place on or about July 2, 2004, in London.

(29) On or about September 3, 2004, at a location in Laurel, Maryland, **SAIFULLAH RANJHA** and **IMDAD RANJHA** accepted \$200,000 in United States currency from a cooperating witness for a hawala transaction involving a hand-to-hand transfer of cash in Canada.

(30) On or about September 9, 2004, at a location in Montreal, Canada, **MAZHAR CHUGHTAI** gave a cooperating witness a quantity of hawala currency, specifically 233,700 in Canadian dollars.

(31) On or about October 6, 2004, at the **HAMZA** office in Washington, D.C., **IMDAD RANJHA** and **MUHAMMAD SAQI** accepted \$20,000 in United States currency from a cooperating witness for a hawala transaction involving deposit of monies into a bank account in Canada.

(32) On or about October 8, 2004, **SAIFULLAH RANJHA** and **MAZHAR CHUGHTAI** coordinated the deposit of 6,250 Canadian dollars into a bank account in Canada designated by a cooperating witness, which was made at a Canadian branch office of the National Bank of Canada.

(33) On or about October 12, 2004, **SAIFULLAH RANJHA** and **MAZHAR CHUGHTAI** coordinated two separate deposits totaling 7,615 Canadian dollars into a bank account in Canada designated by a cooperating witness, which were made at different Canadian branch offices of the National Bank of Canada in the amounts of 5,050 and 2,565 Canadian dollars.

(34) On or about October 13, 2004, **SAIFULLAH RANJHA** and **MAZHAR CHUGHTAI** coordinated two separate deposits totaling 7,995 Canadian dollars into a bank account



in Canada designated by a cooperating witness, which were made at different Canadian branch offices of the National Bank of Canada in the amounts of 3,750 and 4,245 Canadian dollars.

(35) On or about January 19, 2005, at a location in Laurel, Maryland, **SAIFULLAH RANJHA** accepted \$150,000 in United States currency from a cooperating witness for a hawala transaction involving deposit of monies into a bank account in Canada.

(36) On or about January 25, 2005, **SAIFULLAH RANJHA** and **MAZHAR CHUGHTAI** coordinated two separate deposits totaling 10,015 Canadian dollars into a bank account in Canada designated by a cooperating witness, which were made at different Canadian branch offices of the National Bank of Canada in the amounts of 5,000 and 5,015 Canadian dollars.

(37) On or about January 26, 2005, **SAIFULLAH RANJHA** and **MAZHAR CHUGHTAI** coordinated two separate deposits totaling 14,525 Canadian dollars into a bank account in Canada designated by a cooperating witness, which were made at different Canadian branch offices of the National Bank of Canada in the amounts of 6,380 and 8,145 Canadian dollars.

(38) On or about January 27, 2005, **SAIFULLAH RANJHA** and **MAZHAR CHUGHTAI** coordinated the deposit of 7,700 Canadian dollars into a bank account in Canada designated by a cooperating witness, which was made at a Canadian branch office of the National Bank of Canada.

(39) On or about January 31, 2005, **SAIFULLAH RANJHA** and **MAZHAR CHUGHTAI** coordinated the deposit of 6,000 Canadian dollars into a bank account in Canada designated by a cooperating witness, which was made at a Canadian branch office of the National Bank of Canada.

(40) On or about February 1, 2005, **SAIFULLAH RANJHA** and **MAZHAR**



CHUGHTAI coordinated the deposit of 7,155 Canadian dollars into a bank account in Canada designated by a cooperating witness, which was made at a Canadian branch office of the National Bank of Canada.

(41) On or about February 2, 2005, **SAIFULLAH RANJHA** and **MAZHAR CHUGHTAI** coordinated the deposit of 6,800 Canadian dollars into a bank account in Canada designated by a cooperating witness, which was made at a Canadian branch office of the National Bank of Canada.

(42) On or about February 3, 2005, **SAIFULLAH RANJHA** and **MAZHAR CHUGHTAI** coordinated two separate deposits totaling 12,870 Canadian dollars into a bank account in Canada designated by a cooperating witness, which were made at different Canadian branch offices of the National Bank of Canada in the amounts of 6,440 and 6,430 Canadian dollars.

(43) On or about February 4, 2005, **SAIFULLAH RANJHA** and **MAZHAR CHUGHTAI** coordinated the deposit of 7,560 Canadian dollars into a bank account in Canada designated by a cooperating witness, which was made at a Canadian branch office of the National Bank of Canada.

(44) On or about February 7, 2005, **SAIFULLAH RANJHA** and **MAZHAR CHUGHTAI** coordinated two separate deposits of 12,825 Canadian dollars into a bank account in Canada designated by a cooperating witness, which were made at different Canadian branch offices of the National Bank of Canada in the amounts of 6,025 and 6,800 Canadian dollars.

(45) On or about February 8, 2005, **SAIFULLAH RANJHA** and **MAZHAR CHUGHTAI** coordinated the deposit of 6,299 Canadian dollars into a bank account in Canada designated by a cooperating witness, which was made at a Canadian branch office of the National



Bank of Canada.

(46) On or about February 14, 2005, **SAIFULLAH RANJHA** and **MAZHAR CHUGHTAI** coordinated the deposit of 7,955 Canadian dollars into a bank account in Canada designated by a cooperating witness, which was made at a Canadian branch office of the National Bank of Canada.

(47) On or about February 17, 2005, **SAIFULLAH RANJHA** and **MAZHAR CHUGHTAI** coordinated the deposit of 4,410 Canadian dollars into a bank account in Canada designated by a cooperating witness, which was made at a Canadian branch office of the National Bank of Canada.

(48) On or about February 18, 2005, **SAIFULLAH RANJHA** and **MAZHAR CHUGHTAI** coordinated the deposit of 7,770 Canadian dollars into a bank account in Canada designated by a cooperating witness, which was made at a Canadian branch office of the National Bank of Canada.

(49) On or about February 21, 2005, **SAIFULLAH RANJHA** and **MAZHAR CHUGHTAI** coordinated the deposit of 8,635 Canadian dollars into a bank account in Canada designated by a cooperating witness, which was made at a Canadian branch office of the National Bank of Canada.

(50) On or about February 23, 2005, **SAIFULLAH RANJHA** and **MAZHAR CHUGHTAI** coordinated the deposit of 10,665 Canadian dollars into a bank account in Canada designated by a cooperating witness, which was made at a Canadian branch office of the National Bank of Canada.

(51) On or about February 24, 2005, **SAIFULLAH RANJHA** and **MAZHAR**



CHUGHTAI coordinated the deposit of 5,440 Canadian dollars into a bank account in Canada designated by a cooperating witness, which was made at a Canadian branch office of the National Bank of Canada.

(52) On or about February 25, 2005, **SAIFULLAH RANJHA** and **MAZHAR CHUGHTAI** coordinated the deposit of 7,560 Canadian dollars into a bank account in Canada designated by a cooperating witness, which was made at a Canadian branch office of the National Bank of Canada.

(53) On or about February 28, 2005, **SAIFULLAH RANJHA** and **MAZHAR CHUGHTAI** coordinated the deposit of 3,500 Canadian dollars into a bank account in Canada designated by a cooperating witness, which was made at a Canadian branch office of the National Bank of Canada.

(54) On or about March 1, 2005, **SAIFULLAH RANJHA** and **MAZHAR CHUGHTAI** coordinated the deposit of 9,065 Canadian dollars into a bank account in Canada designated by a cooperating witness, which was made at a Canadian branch office of the National Bank of Canada.

(55) On or about March 10, 2005, at the **HAMZA** office in Washington, D.C., **SAIFULLAH RANJHA** accepted \$65,000 in United States currency from a cooperating witness for a hawala transaction involving a hand-to-hand transfer of cash in Canada.

(56) On or about March 16, 2005, at a location in Montreal, Canada, **MAZHAR CHUGHTAI** directed an associate to give a cooperating witness and his associate a quantity of hawala currency, specifically 74,750 in Canadian dollars.

(57) On or about June 1, 2005, at a location in Laurel, Maryland, **SAIFULLAH**



RANJHA accepted \$300,000 in United States currency from a cooperating witness for a hawala transaction involving a hand-to-hand transfer of cash in London, England.

(58) On or about June 22, 2005, at a location in London, England, an individual acting at the direction of **SAIFULLAH RANJHA** gave the designated representative of a cooperating witness a quantity of hawala currency, specifically £73,950 in British pounds sterling.

(59) On or about June 24, 2005, at a location in London, England, an individual acting at the direction of **SAIFULLAH RANJHA** gave the designated representative of a cooperating witness a quantity of hawala currency, specifically £71,400 in British pound sterling.

(60) On or about July 28, 2005, at the **HAMZA** office in Washington, D.C., **SAIFULLAH RANJHA** and **MUHAMMAD SAQI** accepted \$30,000 in United States currency from a cooperating witness for a hawala transaction involving a hand-to-hand transfer of cash in Pakistan.

(61) On or about August 12, 2005, at a location in Pakistan, an individual acting at the direction of **SAIFULLAH RANJHA** gave the designated representative of a cooperating witness a quantity of hawala currency, specifically 1,638,750 in Pakistani rupees.

(62) On or about October 19, 2005, at a location in Laurel, Maryland, **SAIFULLAH RANJHA** accepted \$150,000 in United States currency from a cooperating witness for hawala transactions involving hand-to-hand transfers of cash in Spain and London, England, and for a hawala transaction involving deposit of monies into a bank account in Canada.

(63) On or about October 25, 2005, **SAIFULLAH RANJHA** and **MAZHAR CHUGHTAI** coordinated two separate deposits totaling 9,225 Canadian dollars into a bank account in Canada designated by a cooperating witness, which was made at different Canadian branch



offices of the Royal Bank Financial Group in the amounts of 4,000 and 5,225 Canadian dollars.

(64) On or about October 26, 2005, at a location in Barcelona, Spain, **ANAR MUHAMMAD** gave a cooperating witness a quantity of hawala currency, specifically €71,200 in Euros.

(65) On or about October 28, 2005, **SAIFULLAH RANJHA** and **MAZHAR CHUGHTAI** coordinated two separate deposits totaling 9,655 Canadian dollars into a bank account in Canada designated by a cooperating witness, which were made at different Canadian branch offices of the Royal Bank Financial Group in the amounts of 3,940 and 5,715 Canadian dollars.

(66) On or about November 1, 2005, **SAIFULLAH RANJHA** and **MAZHAR CHUGHTAI** coordinated two separate deposits totaling 11,920 Canadian dollars into a bank account in Canada designated by a cooperating witness, which were made at different Canadian branch offices of the Royal Bank Financial Group in the amounts of 5,390 and 6,530 Canadian dollars.

(67) On or about November 8, 2005, at a location in London, England, an individual acting at the direction of **SAIFULLAH RANJHA** gave the designated representative of cooperating witness a quantity of hawala currency, specifically £10,030 in British pounds sterling.

(68) On or about January 19, 2006, at a location in Laurel, Maryland, **SAIFULLAH RANJHA** accepted \$150,000 in United States currency from a cooperating witness for hawala transactions involving hand-to-hand transfers of cash in Spain.

(69) On or about February 1, 2006, at a location in Madrid, Spain, **PARVEZ SANDHU** gave a cooperating witness a quantity of hawala currency, specifically €35,625 in Euros.

(70) On or about February 10, 2006, at a location in Barcelona, Spain, **ANAR**



MUHAMMAD gave a cooperating witness a quantity of hawala currency, specifically €20,000 in Euros.

(71) On or about February 24, 2006, at a location in Laurel, Maryland, **SAIFULLAH RANJHA** returned \$72,000 in United States currency to a cooperating witness, which represented monies remaining from a partially completed hawala transaction originating on or about January 19, 2006.

(72) On or about April 5, 2006, at a location in Laurel, Maryland, **SAIFULLAH RANJHA** accepted \$250,000 in United States currency from a cooperating witness for a hawala transaction involving a hand-to-hand transfer of cash in London, England.

(73) On or about April 21, 2006, at a location in Laurel, Maryland, **SAIFULLAH RANJHA** accepted \$100,000 in United States currency from a cooperating witness for a hawala transaction involving a hand-to-hand transfer of cash in Spain.

(74) On or about May 4, 2006, at a location in London, England, an individual acting at the direction of **SAIFULLAH RANJHA** gave the designated representative of a cooperating witness a quantity of hawala currency, specifically £74,980 in British pounds sterling.

(75) On or about May 5, 2006, at a location in London, England, an individual acting at the direction of **SAIFULLAH RANJHA** gave the designated representative of a cooperating witness a quantity of hawala currency, specifically £36,405 in British pounds sterling.

(76) On or about May 9, 2006, at a location in London, England, an individual acting at the direction of **SAIFULLAH RANJHA** gave the designated representative of a cooperating witness a quantity of hawala currency, specifically £15,000 in British pounds sterling.

(77) On or about May 10, 2006, at a location in Barcelona, Spain, **ANAR**



MUHAMMAD gave a cooperating witness a quantity of hawala currency, specifically €55,000 in Euros.

(78) On or about May 22, 2006, at a location in Laurel, Maryland, **SAIFULLAH RANJHA** returned \$20,700 in United States currency to a cooperating witness, which represented monies remaining from a partially completed hawala transaction originating on or about April 21, 2006.

(79) On or about February 20, 2007, at a location in Laurel, Maryland, **SAIFULLAH RANJHA** accepted \$100,000 in United States currency from a cooperating witness for a hawala transaction designated to be a hand-to-hand transfer of cash in Sydney, Australia, but subsequently involving deposit of monies into an Australian bank account.

(80) On or about March 30, 2007, **SAIFULLAH RANJHA** coordinated the deposit of 31,240 in Australian dollars into a bank account in Australia designated by a cooperating witness, which was made by a wire transfer from a business entity in the United Arab Emirates.

(81) On or about April 2, 2007, **SAIFULLAH RANJHA** coordinated the deposit of 40,000 in Australian dollars into a bank account in Australia designated by a cooperating witness, which was made by a wire transfer from a business entity in the United Arab Emirates.

(82) On or about April 10, 2007, **SAIFULLAH RANJHA** coordinated the deposit of 35,160 in Australian dollars into a bank account in Australia designated by a cooperating witness, which was made by a wire transfer from a business entity in the United Arab Emirates.

(83) On or about July 26, 2007, at the **HAMZA** office in Washington, D.C., **SAIFULLAH RANJHA** accepted \$50,000 in United States currency from a cooperating witness for a hawala transaction involving deposit of monies into a bank account in Australia.



(84) On or about August 7, 2007, **SAIFULLAHRANJHA** coordinated the deposit of 50,815 in Australian dollars into a bank account in Australia designated by a cooperating witness, which was made by a wire transfer from a business entity in the United Arab Emirates.

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 14, 16 and 17 of Count One of this Superseding Indictment are realleged and incorporated by reference as though fully set forth herein.

2. Beginning in or about February 2004, and continuing through on or about the date of this Superseding Indictment, in the State and District of Maryland, the District of Columbia, Canada, England, Spain, Pakistan, Australia, and elsewhere,

SAIFULLAH ANJUM RANJHA,

a defendant herein who was in the United States, did knowingly conceal and disguise the nature, location, source, ownership, and control of material support and resources, and funds and proceeds of such funds, to wit: monies provided by, and transmitted on behalf of, an individual associated with Afridi Services, a/k/a Afridi Trading, knowing and intending that said support and resources were to be provided to a foreign terrorist organization, namely, al Qaeda, which action would affect interstate and foreign commerce and constitute a violation of Title 18, United States Code, Section 2339B(a)(1).

18 U.S.C. § 2339C(c)(1)(A) and (c)(2)(A)
18 U.S.C. § 2339A(b)
8 U.S.C. § 1182(a)(3)(B)
18 U.S.C. § 2



COUNT THREE

1. The allegations set forth in paragraphs 1 through 14, 16 and 17 of Count One of this Indictment are realleged and incorporated by reference as though fully set forth herein.

2. Beginning in or about October 2003, and continuing through on or about the date of this Superseding Indictment, in the State and District of Maryland,

**SAIFULLAH ANJUM RANJHA,
and
IMDAD ULLAH RANJHA,**

defendants 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 defendants 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 FOUR THROUGH SEVENTEEN

1. The allegations set forth in paragraphs 1 through 14, 16 and 17 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, 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, 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; concealment of terrorist financing in violation of Title 18, United States Code, Section 2339C; and trafficking in contraband cigarettes in violation of Title 18, United States Code, Section 2342.

Count	Dates	Defendant(s)	Amount of Funds	Locations of Fund Transfers
4	January 20 through January 22, 2004	SAIFULLAH ANJUM RANJHA, MAZHAR IQBAL CHUGHTAI	\$13,000	Canada
5	February 5 through February 19, 2004	SAIFULLAH ANJUM RANJHA, MAZHAR IQBAL CHUGHTAI	\$50,000	Canada



Count	Dates	Defendant(s)	Amount of Funds	Locations of Fund Transfers
6	March 22 through April 5, 2004	SAIFULLAH ANJUM RANJHA, MAZHAR IQBAL CHUGHTAI	\$100,000	Canada
7	May 5 through May 17, 2004	SAIFULLAH ANJUM RANJHA, MAZHAR IQBAL CHUGHTAI	\$100,000	Canada Japan
8	June 22 through July 2, 2004	SAIFULLAH ANJUM RANJHA	\$280,000	London, England
9	August 19 through August 31, 2004	SAIFULLAH ANJUM RANJHA, MAZHAR IQBAL CHUGHTAI	\$100,000	Canada Japan
10	September 3 through September 9, 2004	SAIFULLAH ANJUM RANJHA, IMDAD ULLAH RANJHA, MAZHAR IQBAL CHUGHTAI	\$200,000	Canada
11	January 19 through March 1, 2005	SAIFULLAH ANJUM RANJHA, MAZHAR IQBAL CHUGHTAI	\$150,000	Canada
12	June 1 through June 24, 2005	SAIFULLAH ANJUM RANJHA	\$300,000	London, England
13	October 19 through November 8, 2005	SAIFULLAH ANJUM RANJHA, MUHAMMAD RIAZ SAQI, MAZHAR IQBAL CHUGHTAI, ANAR MUHAMMAD, a/k/a Akthar Ali	\$150,000	London, England Barcelona, Spain Canada
14	January 19 through February 10, 2006	SAIFULLAH ANJUM RANJHA, ANAR MUHAMMAD, a/k/a Akthar Ali, PARVEZ MEHMOOD SANDHU	\$150,000	Madrid, Spain Barcelona, Spain



Count	Dates	Defendant(s)	Amount of Funds	Locations of Fund Transfers
15	April 5 through May 9, 2006	SAIFULLAH ANJUM RANJHA	\$250,000	London, England
16	April 21 through May 10, 2006	SAIFULLAH ANJUM RANJHA, ANAR MUHAMMAD, a/k/a Akthar Ali	\$100,000	Barcelona, Spain
17	February 20 through April 10, 2007	SAIFULLAH ANJUM RANJHA	\$100,000	Sydney, Australia

18 U.S.C. § 1956(a)(3)(B)

18 U.S.C. § 1956(c)(7)

18 U.S.C. § 2



COUNTS EIGHTEEN THROUGH THIRTY-ONE

1. The allegations set forth in paragraphs 1 through 14, 16 and 17 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,

SAIFULLAH ANJUM RANJHA,

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
18	January 20, 2004	\$13,000
19	February 5, 2004	\$50,000
20	March 22, 2004	\$100,000
21	May 5, 2004	\$100,000
22	June 22, 2004	\$280,000
23	August 19, 2004	\$100,000
24	September 3, 2004	\$200,000
25	January 19, 2005	\$150,000
26	June 1, 2005	\$300,000
27	October 19, 2005	\$150,000
28	January 19, 2006	\$150,000



Count	Dates	Amount of Funds
29	April 5, 2006	\$250,000
30	April 21, 2006	\$100,000
31	February 20, 2007	\$100,000

31 U.S.C. § 5313(a)
31 C.F.R. §§ 103.22(a)(1) and (b)(1)
31 C.F.R. § 103.27(a)(1)
31 U.S.C. § 5322(b)
31 U.S.C. § 5312(a)(2)(R)
31 C.F.R. §§ 103.11(n)(3) and (uu)(5)
18 U.S.C. § 2



FORFEITURE ALLEGATION

1. The allegations of this Superseding Indictment as contained in Counts One and Three through Seventeen 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 and Three through Seventeen,

**SAIFULLAH ANJUM RANJHA,
MUHAMMAD RIAZ SAQI,
IMDAD ULLAH RANJHA,
MAZHAR IQBAL CHUGHTAI,
ANAR MUHAMMAD, a/k/a Akthar Ali,
PARVEZ MEHMOOD SANDHU,**

and

HAMZA, INC., d/b/a Pak American Money Transfer,

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. \$2,208,000.00 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).

b. a 2004 blue Toyota Camry, VIN 4T1BE32K94U874559, Maryland



Registration CD9-120.

- c. The following financial accounts and monetary instruments:
 - i. Bank of America Checking Account 4124536016 in the name of Hamza, Inc.;
 - ii. Bank of America Checking Account 4124535978 in the name of Hamza, Inc.;
 - iii. Bank of America Checking Account 4466194077 in the name of Saifullah A. Ranjha;
 - iv. Provident Bank Certificate of Deposit 99525479 in the name of Hamza, Inc.;
 - v. Citizens Bank (now known as PNC Bank) Checking Account 1462055 in the name of Saifullah A. Ranjha;
 - vi. Wachovia/First Union Bank Checking Account 1010113254101 in the name of Saifullah A. Ranjha.

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: 1) the 2004 blue Toyota Camry, VIN 4T1BE32K94U874559, Maryland Registration CD9-120; 2) the financial accounts and monetary instruments listed and described in



paragraph 2(c); and 3) any other property of said defendants up to the value of the forfeitable property, that is, \$2,208,000.00.

18 U.S.C. § 982(a)(1)

Rod J. Rosenstein
United States Attorney

A TRUE BILL:

Foreperson

Date