





Department of Homeland Security, was responsible for providing immigration-related services and benefits such as visas, lawful permanent resident cards and naturalization certificates. Foreign nationals present in the United States could petition USCIS to adjust to lawful permanent resident status and obtain a lawful permanent resident card, otherwise known as an I-551 or “green card.” A lawful permanent resident could work and live in the United States indefinitely and apply for United States citizenship.

2. Under the statutory and regulatory provisions of the Immigration and Nationality Act, various processes and procedures would have to be satisfied before USCIS approved a foreign national for adjustment to lawful permanent resident status and issued a lawful permanent residence card. These procedures varied depending upon the immigration status of the foreign national in the United States, and would include the filing of formal petitions or applications by the foreign national, and his or her employer or family member. Upon review of the relevant applications, USCIS would then determine whether or not to grant permanent resident status to the foreign national and issue that individual a lawful permanent resident card.

3. **MOHAMMAD RIAZ GUJJAR** (hereinafter **MOHAMMAD GUJJAR**) was born in Pakistan and is a naturalized United States citizen. He resided in Snow Hill, Maryland. In April 1995, **MOHAMMAD GUJJAR** incorporated Snow Hill Star, Inc., a/k/a Snow Star, Inc., in the State of Maryland. The corporation traded as Your Stop Food Market, a convenience store and gas station owned and operated by **MOHAMMAD GUJJAR** at 426 West Market Street in Snow Hill.

4. **MOHAMMAD IJAZ**, who is the brother of **MOHAMMAD GUJJAR**, was born in Pakistan and is a naturalized United States citizen. He resided in Snow Hill, Maryland. In February 1993, **MOHAMMAD IJAZ**, **MOHAMMAD GUJJAR**, and two other individuals



incorporated Alpine, Inc., in the State of Maryland. The corporation traded as Chicken Man Food Store, which was a convenience store and gas station owned and operated by **MOHAMMAD IJAZ** at 429 West Market Street in Snow Hill.

5. **JAVED IQBAL (I)** was born in Pakistan. He resided in Snow Hill, Maryland. As of the date of this Superseding Indictment, **JAVED IQBAL (I)** was neither a citizen nor a lawful permanent resident of the United States. **JAVED IQBAL (I)** was employed at both Your Stop Food Market and Chicken Man Food Store.

6. **SAEED AHMED** was born in Pakistan and is a naturalized United States citizen. He resided in Salisbury, Maryland.

7. **MOHAMMAD AKHTAR** was born in Pakistan. He resided in Jersey City, New Jersey. As of the date of this Superseding Indictment, **MOHAMMAD AKHTAR** was neither a citizen nor a lawful permanent resident of the United States.

8. **MOHAMMAD ASIF** was born in Pakistan. He resided in Milwaukee, Wisconsin. As of the date of this Superseding Indictment, **MOHAMMAD ASIF** was neither a citizen nor a lawful permanent resident of the United States.

9. **MUHAMMAD ASHRAF** was born in Pakistan. He resided at 11404 Beckford Avenue in Princess Anne, Maryland, which was also the location of Your Store, a convenience store operated by **MUHAMMAD ASHRAF**. As of the date of this Superseding Indictment, **MUHAMMAD ASHRAF** was neither a citizen nor a lawful permanent resident of the United States.

10. **AQEEL KHALID** was born in Pakistan. He resided in Snow Hill, Maryland. As of the date of this Superseding Indictment, **AQEEL KHALID** was neither a citizen nor a lawful



permanent resident of the United States.

11. **ZAKIR MAHMOOD** was born in Pakistan. He resided in Snow Hill, Maryland. As of the date of this Superseding Indictment, **ZAKIR MAHMOOD**, was neither a citizen nor a lawful permanent resident of the United States.

12. **SHAMSHER AKHTAR**, who is the son of **MOHAMMAD AKHTAR**, was born in Pakistan. He resided in Jersey City, New Jersey. As of the date of this Superseding Indictment, **SHAMSHER AKHTAR** was neither a citizen nor a lawful permanent resident of the United States.

13. **GHAZANFAR ALI SHAH** (hereinafter **GHAZANFAR SHAH**) was born in Pakistan. He resided in Milwaukee, Wisconsin. As of the date of this Superseding Indictment, **GHAZANFAR SHAH** was neither a citizen nor a lawful permanent resident of the United States.

14. **MUHAMMAD JAMIL REHMAN** (hereinafter **MUHAMMAD REHMAN**) was born in Pakistan. He resided in West Allis, Wisconsin. As of the date of this Superseding Indictment, **MUHAMMAD REHMAN** was neither a citizen nor a lawful permanent resident of the United States.

15. **HYDER ALI** was born in Pakistan. He resided in Brooklyn, New York. As of the date of this Superseding Indictment, **HYDER ALI** was neither a citizen nor a lawful permanent resident of the United States.

16. **IRSHAD AHMED** was born in Pakistan. He resided in Jersey City, New Jersey. As of the date of this Superseding Indictment, **IRSHAD AHMED** was neither a citizen nor a lawful permanent resident of the United States.

17. **AFZAL SARWAR** was born in Pakistan. He resided in Illinois. As of the date of this Superseding Indictment, **AFZAL SARWAR** was neither a citizen nor a lawful permanent



resident of the United States.

18. **NASAR AHMAD** was born in Pakistan. He resided in Brooklyn, New York. As of the date of this Superseding Indictment, **NASAR AHMAD** was neither a citizen nor a lawful permanent resident of the United States.

19. **ABID HUSSAIN** was born in Pakistan. He resided in Brooklyn, New York. As of the date of this Superseding Indictment, **ABID HUSSAIN** was neither a citizen nor a lawful permanent resident of the United States.

20. **UPENDRAKUMAR SOMABHAI PATEL** (hereinafter **UPENDRAKUMAR PATEL**) resided in Parsonsburg, Maryland. As of the date of this Superseding Indictment, **UPENDRAKUMAR PATEL** was neither a citizen nor a lawful permanent resident of the United States.

21. **IDRISHBHAI DAUBHAI PATEL** (hereinafter **IDRISHBHAI PATEL**) resided in Snow Hill, Maryland. As of the date of this Superseding Indictment, **IDRISHBHAI PATEL** was neither a citizen nor a lawful permanent resident of the United States.

22. **MUHAMMAD IMRAN CHAUDHRY** (hereinafter **MUHAMMAD CHAUDHRY**) was born in Pakistan. He resided in Parsonsburg, Maryland. As of the date of this Superseding Indictment, **MUHAMMAD CHAUDHRY** was neither a citizen nor a lawful permanent resident of the United States.

23. **RASHID AHMED, a/k/a Choudhry Ahmed** (hereinafter **RASHID AHMED**), was born in Pakistan. He resided in Brooklyn, New York. As of the date of this Superseding Indictment, **RASHID AHMED** was neither a citizen nor a lawful permanent resident of the United States.

24. **MUHAMMAD RAZZAQ BUTT** (hereinafter **MUHAMMAD BUTT**) resided in



Salisbury, Maryland. As of the date of this Superseding Indictment, **MUHAMMAD BUTT** was neither a citizen nor a lawful permanent resident of the United States.

25. **OMAIR YOUNAS** resided in Brooklyn, New York. As of the date of this Superseding Indictment, **OMAIR YOUNAS** was neither a citizen nor a lawful permanent resident of the United States.

26. **JAVED IQBAL (II)** was born in Pakistan. He resided in Salisbury, Maryland. As of the date of this Superseding Indictment, **JAVED IQBAL (II)** was neither a citizen nor a lawful permanent resident of the United States.

27. Afridi Services, a/k/a Afridi Trading, 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: large-scale international drug trafficking, and international smuggling of counterfeit cigarettes and other goods and contraband. The cooperating witness also represented that he had connections to high-placed federal and Maryland State government employees who would be willing to accept bribes in exchange for undertaking official acts in contravention of their lawful duties. Specifically, the cooperating witness represented that in exchange for specific quantities of United States currency, his Immigration contacts would be willing to issue lawful permanent resident cards, and his contacts in the Office of the Comptroller of Maryland would be willing to abate business-related tax assessments.



The Charge

28. Beginning in or about March 2005, and continuing through on or about the date of this Superseding Indictment, in the State and District of Maryland, the State of Wisconsin, the State of New York, the State of New Jersey, and elsewhere,

**MOHAMMAD RIAZ GUJJAR,  
MOHAMMAD IJAZ,  
JAVED IQBAL (I),  
SAEED AHMED,  
MOHAMMAD AKHTAR,  
MOHAMMAD ASIF,  
MUHAMMAD ASHRAF,  
AQEEL KHALID,  
ZAKIR MAHMOOD,  
SHAMSHER AKHTAR,  
HAZANFAR ALI SHAH,  
MUHAMMAD JAMIL REHMAN,  
HYDER ALI,  
IRSHAD AHMED,  
AFZAL SARWAR,  
NASAR AHMAD,  
ABID HUSSAIN,  
JOHN DOE, a/k/a Unis,  
UPENDRAKUMAR SOMABHAI PATEL,  
IDRISHBHAI DAUBHAI PATEL,  
MUHAMMAD IMRAN CHAUDHRY,  
RASHID AHMED, a/k/a Choudry Ahmed,  
MUHAMMAD RAZZAQ BUTT,  
OMAIR YOUNAS,  
and  
JAVED IQBAL (II),**

defendants herein, did knowingly and unlawfully combine, conspire, confederate and agree with each other, and with persons known and unknown to the Grand Jury, to commit an offense against the United States, to wit: to directly and indirectly corruptly give, offer and promise to a public official, that is, an individual believed to be an official with United States Citizenship and Immigration Services, something of value, that is, a quantity of United States currency, with the



intent to induce such public official to do and omit to do any act, that is, to issue lawful permanent resident cards, in violation of the lawful duty of such official, in violation of Section 201(b)(1)(C) of Title 18, United Code.

**Overt Acts**

29. In furtherance of the charged conspiracy, and to effect the object thereof, members of the conspiracy did perform, participate in, and commit the following acts, among others:

(1) On or about December 28, 2005, **MOHAMMAD AKHTAR** and **SHAMSHER AKHTAR** met in Jersey City, New Jersey, with a cooperating witness and provided him with \$5,000 in United States currency to give to an Immigration official as the first payment of a \$25,000 bribe to induce said official to illegally issue lawful permanent resident cards for **MOHAMMAD AKHTAR** and **SHAMSHER AKHTAR**.

(2) On or about January 23, 2006, **MOHAMMAD GUJJAR** and **JAVED IQBAL (I)** met with a cooperating witness in Snow Hill, Maryland, and provided him with \$7,500 in United States currency to give to an Immigration official as the first payment of a \$15,000 bribe to induce said official to illegally issue a lawful permanent resident card for **JAVED IQBAL (I)**.

(3) On or about March 3, 2006, **MOHAMMAD GUJJAR** and **JAVED IQBAL (I)** met with a cooperating witness in Snow Hill, Maryland, and provided him with \$7,500 in United States currency to give to an Immigration official as the second and final payment of a \$15,000 bribe to induce said official to illegally issue a lawful permanent resident card for **JAVED IQBAL (I)**.

(4) On or about March 10, 2006, **MOHAMMAD GUJJAR** and **JAVED IQBAL (I)** met with a cooperating witness in Snow Hill, Maryland, and provided him with \$10,000 in United States currency to give to an Immigration official as the second payment of a \$25,000 bribe





to induce said official to illegally issue lawful permanent resident cards for **MOHAMMAD AKHTAR** and **SHAMSHER AKHTAR**.

(5) On or about March 10, 2006, in Snow Hill, Maryland, **MOHAMMAD GUJJAR, JAVED IQBAL (I), AQEEL KHALID** and **ZAKIR MAHMOOD** met with a cooperating witness in Snow Hill, Maryland, and provided him with \$15,000 in United States currency to give to an Immigration official as the first payment of a \$40,000 bribe to induce said official to illegally issue lawful permanent resident cards for **AQEEL KHALID** and **ZAKIR MAHMOOD**.

(6) On or about June 1, 2006, **MOHAMMAD GUJJAR, JAVED IQBAL (I), AQEEL KHALID** and **ZAKIR MAHMOOD** met with a cooperating witness in Snow Hill, Maryland, and provided him with \$15,000 in United States currency to give to an Immigration official as the second payment of a \$40,000 bribe to induce said official to illegally issue lawful permanent resident cards for **AQEEL KHALID** and **ZAKIR MAHMOOD**.

(7) On or about June 7, 2006, **MOHAMMAD GUJJAR, JAVED IQBAL (I), AQEEL KHALID** and **ZAKIR MAHMOOD** met with a cooperating witness in Snow Hill, Maryland, and provided him with \$10,000 in United States currency to give to an Immigration official as the third and final payment of a \$40,000 bribe to induce said official to illegally issue lawful permanent resident cards for **AQEEL KHALID** and **ZAKIR MAHMOOD**.

(8) On or about August 11, 2006, **MOHAMMAD GUJJAR** met with a cooperating witness in Snow Hill, Maryland, and provided him with \$8,000 in United States currency to give to an Immigration official as the first payment of a \$20,000 bribe to induce said official to illegally issue a lawful permanent resident card for a relative of **MOHAMMAD**



**AKHTAR**, who, as of the date of this Indictment, was neither a citizen nor a lawful permanent resident of the United States.

(9) On or about August 11, 2006, **MOHAMMAD GUJJAR** and **JAVED IQBAL (I)** met with a cooperating witness in Snow Hill, Maryland, and provided him with \$15,000 in United States currency to give to an Immigration official as the first payment of a \$20,000 bribe to induce said official to illegally issue a lawful permanent resident card for **MUHAMMAD ASHRAF**.

(10) On or about August 15, 2006, **MOHAMMAD GUJJAR** and **JAVED IQBAL (I)** met with a cooperating witness in Snow Hill, Maryland, and provided him with \$11,000 in United States currency to give to an Immigration official as the first payment of a \$21,000 bribe to induce said official to illegally issue a lawful permanent resident card for **MOHAMMAD ASIF**.

(11) On or about October 11, 2006, **MOHAMMAD GUJJAR** met with a cooperating witness in Ocean City, Maryland, and provided him with \$5,000 in United States currency to give to an Immigration official as the second and final payment of a \$20,000 bribe to induce said official to illegally issue a lawful permanent resident card for **MUHAMMAD ASHRAF**.

(12) On or about October 11, 2006, in Snow Hill, Maryland, **MOHAMMAD GUJJAR** and **MOHAMMAD AKHTAR** met with a cooperating witness in Ocean City, Maryland, and provided him with \$5,000 in United States currency to give to an Immigration official as the third payment of a \$25,000 bribe to induce said official to illegally issue lawful permanent resident cards for **MOHAMMAD AKHTAR** and **SHAMSHER AKHTAR**.

(13) On or about October 12, 2006, **MOHAMMAD AKHTAR** met with a



cooperating witness in Ocean City, Maryland, and provided him with \$5,000 in United States currency to give to an Immigration official as the fourth and final payment of a \$25,000 bribe to induce said official to illegally issue lawful permanent resident cards for **MOHAMMAD AKHTAR** and **SHAMSHER AKHTAR**.

(14) On or about October 24, 2006, **MOHAMMAD ASIF** met with a cooperating witness in Milwaukee, Wisconsin, and provided him with \$10,000 in United States currency to give to an Immigration official as the second and final payment of a \$21,000 bribe to induce said official to illegally issue a lawful permanent resident card for **MOHAMMAD ASIF**.

(15) On or about November 7, 2006, **MOHAMMAD ASIF**, **GHANZAFAR SHAH**, and **MUHAMMAD REHMAN** met with a cooperating witness in Milwaukee, Wisconsin, and provided him with \$20,000 in United States currency to give to an Immigration official as the first payment of a \$40,000 bribe to induce said official to illegally issue lawful permanent resident cards for **GHANZAFAR SHAH** and **MUHAMMAD REHMAN**.

(16) On or about December 20, 2006, **HYDER ALI** met with a cooperating witness in New York City, New York, as a result of arrangements made by **MOHAMMAD ASIF**, and provided him with \$6,500 in United States currency to give to an Immigration official as the first payment of a \$25,000 bribe to induce said official to illegally issue a lawful permanent resident card for **HYDER ALI**.

(17) On or about January 11, 2007, **MOHAMMAD GUJJAR** met with a cooperating witness in Salisbury, Maryland, and provided him with \$12,000 in United States currency to give to an Immigration official as the second and final payment of a \$20,000 bribe to induce said official to illegally issue a lawful permanent resident card for a relative of



**MOHAMMAD AKHTAR.**

(18) On or about January 25, 2007, **MOHAMMAD ASIF, GHANZAFAR SHAH**, and **MUHAMMAD REHMAN** met with a cooperating witness in Milwaukee, Wisconsin, and provided him with \$20,000 in United States currency to give to an Immigration official as the second and final payment of a \$40,000 bribe to induce said official to illegally issue lawful permanent resident cards for **GHANZAFAR SHAH** and **MUHAMMAD REHMAN**.

(19) On or about February 28, 2007, **HYDER ALI** met with a cooperating witness in New York City, New York, and provided him with \$13,500 in United States currency to give to an Immigration official as the second payment of a \$25,000 bribe to induce said official to illegally issue a lawful permanent resident card for **HYDER ALI**.

(20) On or about February 28, 2007, **MOHAMMAD AKHTAR** and **IRSHAD AHMED** met with a cooperating witness in Jersey City, New Jersey, and provided him with \$6,500 in United States currency to give to an Immigration official as the first payment of a \$25,000 bribe to induce said official to illegally issue a lawful permanent resident card for **IRSHAD AHMED**.

(21) On or about April 4, 2007, **MOHAMMAD GUJJAR** and **MOHAMMAD IJAZ** met with a cooperating witness in Salisbury, Maryland, and provided him with \$20,000 in United States currency to give to an Immigration official as the second and final payment of a bribe, negotiated to be \$25,000 but totaling \$26,500, to induce said official to illegally issue a lawful permanent resident card for **IRSHAD AHMED**.

(22) On or about June 26, 2007, **AFZAL SARWAR** met with a cooperating witness in Milwaukee, Wisconsin, and provided him with \$14,000 in United States currency to give to an Immigration official as the first payment of a \$25,000 bribe to induce said official to illegally



issue a lawful permanent resident card for **AFZAL SARWAR**.

(23) On or about August 15, 2007, **MOHAMMAD ASHRAF, NASAR AHMAD,** and **ABID HUSSEIN** met with a cooperating witness in Ocean City, Maryland, and provided him with \$20,000 in United States currency to give to an Immigration official as the first payment of a \$50,000 bribe to induce said official to illegally issue lawful permanent resident cards for **NASAR AHMAD** and **ABID HUSSEIN**.

(24) On or about August 15, 2007, **JOHN DOE, a/k/a Unis,** and **UPENDRAKUMAR PATEL** met with a cooperating witness in Ocean City, Maryland, as a result of arrangements made by **MOHAMMAD GUJJAR**, and provided him with \$15,000 in United States currency to give to an Immigration official as the first payment of a \$25,000 bribe to induce said official to illegally issue a lawful permanent resident card for **UPENDRAKUMAR PATEL**.

(25) On or about August 17, 2007, **MOHAMMAD GUJJAR** met with a cooperating witness in Ocean City, Maryland, and directed the cooperating witness to apply the overpayment of \$1,500 in U.S. currency made on the bribe for **IRSHAD AHMED**, referenced in Overt Acts (20) and (21), towards the \$5,000 balance remaining on the bribe for **HYDER ALI**, referenced in Overt Acts (16) and (19).

(26) On or about August 30, 2007, **MOHAMMAD GUJJAR, IDRISHBHAI PATEL,** and **MUHAMMAD CHAUDHRY** met with a cooperating witness in Baltimore, Maryland, and provided him with \$30,000 in United States currency to give to an Immigration official as the first payment of a \$50,000 bribe to induce said official to illegally issue lawful permanent resident cards for **IDRISHBHAI PATEL** and **MUHAMMAD CHAUDHRY**.

(27) On or about August 30, 2007, **SAEED AHMED, RASHID AHMED,**



**MUHAMMAD BUTT, OMAIR YOUNAS, and JAVED IQBAL (II)** met with a cooperating witness in Baltimore, Maryland, and provided him with \$60,000 in United States currency to give to an Immigration official as the first payment of a \$100,000 bribe to induce said official to illegally issue lawful permanent resident cards for **RASHID AHMED, MUHAMMAD BUTT, OMAIR YOUNAS, and JAVED IQBAL (II)**.

(28) On or about August 30, 2007, **MOHAMMAD GUJJAR** met with a cooperating witness in Baltimore, Maryland, provided him with \$7,500 in U.S. currency, and directed him to credit the sum of \$3,500 to pay off the balance remaining on the bribe on behalf of **HYDER ALI**, referenced in Overt Acts (16), (19) and (25), and credit the sum of \$4,000 towards a \$14,000 bribe to induce an Immigration official to illegally provide information and assistance towards obtaining United States immigration documents for relatives of **MOHAMMAD GUJJAR**.

18 U.S.C. § 371  
18 U.S.C. § 201(b)(1)(C)  
18 U.S.C. § 201(a)(1)



## COUNT TWO

1. The allegations set forth in paragraphs 1 through 27 of Count One of this Superseding Indictment are realleged and incorporated by reference as though fully set forth herein.

At all times relevant to this Superseding Indictment:

2. The Comptroller of the State of Maryland, and his employees and agents, administered the laws relating to the collection of state taxes, including business-related taxes such as the sales and use tax. Under Section 11-102 of the Annotated Code of Maryland, Tax - General, a state tax was imposed on the sale of goods and services consumed, possessed, stored, or used in the State. The vendor of goods and services in the State was responsible for payment to the Comptroller of Maryland of the sales and use tax due and owing, and collected by the vendor in connection with the sale of his or her goods and services.

3. Section 9-201 of the Annotated Code of Maryland, Criminal Law, made it an offense in the State of Maryland to bribe, or attempt to bribe, a public employee in order to influence that employee in the performance of their official duties. As set forth in that section, a “public employee” included an officer or employee of the State, such as the Comptroller of Maryland and his employees and agents. The state offense of bribery of a public employee was punishable by imprisonment for more than one year.

4. On August 19, 2004, the Comptroller of Maryland issued a Notice of Final Determination of outstanding sales and use tax due and owing from Snow Star, Inc. (a/k/a Snow Hill Star, Inc.), t/a Your Stop Food Market, and its officer, **MOHAMMAD GUJJAR**, in the amount of \$313,611.97.

5. On August 26, 2004, the Comptroller of Maryland issued a Notice of Assessment of



outstanding sales and use tax due and owing from Alpine, Inc., t/a Chicken Man Food Store, and its officer, **MOHAMMAD IJAZ**, in the amount of \$474,331.51.

6. Ashraf, Inc., t/a Thirsty's, was a convenience store and gas station located at 9530 Ocean Highway in Delmar, Maryland. Ashraf, Inc., was incorporated in the State of Maryland in May 2005, and **SAEED AHMED** was named as the corporation's resident agent. On September 14 and 15, 2006, the Comptroller of Maryland issued Notices of Assessment of outstanding sales and use tax due and owing from Ashraf, Inc., and its officers, including **SAEED AHMED**, in the amount of \$57,004.50.

7. Fatimano, Inc., t/a Thirsty's, was a convenience store and gas station located at 1053 South Salisbury Boulevard in Salisbury, Maryland. The company was incorporated in the State of Maryland in July 2001. On September 14 and 15, 2006, the Comptroller of Maryland issued Notices of Assessment of outstanding sales and use tax due and owing from Fatimano, Inc., and its officers in the amount of \$493,072.35.

8. Hut, Inc., t/a Thirsty's, was a convenience store and gas station located at 9435 North Ocean Highway in Delmar, Maryland. The company was incorporated in the State of Maryland in September 2001. On September 14 and 15, 2006, the Comptroller of Maryland issued Notices of Assessment of outstanding sales and use tax due and owing from Hut, Inc., and its officers in the amount of \$320,544.71.

9. Danbadi, Inc., t/a Cross Road Food Mart, was a convenience store and gas station located at 2601 Old Ocean City Road in Salisbury, Maryland. The company was incorporated in the State of Maryland in October 2004. On September 14 and 15, 2006, the Comptroller of Maryland issued Notices of Assessment of outstanding sales and use tax due and owing from





Danbadi, Inc., and its officers in the amount of \$66,699.60.

10. Mandi, Inc., t/a Cross Road Food Mart, was a convenience store and gas station located at 2601 Old Ocean City Road in Salisbury, Maryland. The company was incorporated in the State of Maryland in April 2001. On September 14 and 15, 2006, the Comptroller of Maryland issued Notices of Assessment of outstanding sales and use tax due and owing from Mandi, Inc., and its officers in the amount of \$126,475.77.

11. The following individuals and entities were joined together as a group, associated in fact, which engaged in, and the activities of which affected, interstate and foreign commerce: **MOHAMMAD GUJJAR; MOHAMMAD IJAZ; JAVED IQBAL (I); SAEED AHMED; MOHAMMAD AKHTAR; MOHAMMAD ASIF;** SNOW HILL STAR, INC., a/k/a Snow Star, Inc., t/a Your Stop Food Market; and ALPINE, INC., t/a Chicken Man Food Store. As such, this group of individuals, entities, and others known and unknown, constituted an “enterprise,” as that term is defined in Section 1961(4) of Title 18, United States Code. The members of this enterprise functioned as a continuing unit for the common purpose of achieving the objectives of the enterprise. Among those objectives were the following:

a. to provide monetary, economic and administrative support, through both lawful and unlawful means, to certain individuals of Pakistani descent native to the Gujrat District and neighboring districts in the Punjab Province of Pakistan;

b. to illegally obtain lawful permanent resident cards for members of the enterprise, and their associates, employees and family members, in order to allow those individuals to reside and work in the United States without restriction;

c. to relieve members of the enterprise, and their associates and family members,



of business-related tax debts, through illegal means, in order to preserve and protect their businesses, profits and assets; and

d. to transmit monies represented to be the proceeds of, and used to facilitate, unlawful activity by concealing and disguising the nature, source and ownership of said proceeds in order to obtain financial and other benefits for the enterprise.

12. **MOHAMMAD GUJJAR** exercised leadership control over the enterprise and directed and coordinated the unlawful conduct of its members. **MOHAMMAD IJAZ** and **JAVED IQBAL (I)** actively assisted **MOHAMMAD GUJJAR** in the day to day operation of the enterprise. **MOHAMMAD IJAZ, SAEED AHMED, MOHAMMAD AKHTAR,** and **MOHAMMAD ASIF** each took action, in coordination with **MOHAMMAD GUJJAR,** to expand the scope and objectives of the enterprise for the benefit of themselves and others.

**The Charge**

13. Beginning in or about January 2005, and continuing through on or about the date of this Superseding Indictment, in the State and District of Maryland, the State of Wisconsin, the State of New York, the State of New Jersey, and elsewhere,

**MOHAMMAD RIAZ GUJJAR,  
MOHAMMAD IJAZ,  
JAVED IQBAL (I),  
SAEED AHMED,  
MOHAMMAD AKHTAR,  
and  
MOHAMMAD ASIF,**

defendants herein, being persons employed by and associated with the above-described enterprise which was engaged in, and the activities of which affected, interstate and foreign commerce, did knowingly and intentionally combine, conspire, confederate, and agree with each other, and with



persons known and unknown to the Grand Jury, to violate Section 1962(c) of Title 18, United States Code, that is, to conduct and participate, directly and indirectly, in the conduct of affairs of the enterprise through a pattern of racketeering activity, as that term is defined in Sections 1961(1) and (5) of Title 18, United States Code, consisting of multiple acts indictable under the following provisions of federal law:

- a. Section 201(b)(1)(C) of Title 18, United States Code (bribery);
- b. Section 1956(a)(3)(B) of Title 18, United States Code (money laundering);

and multiple acts chargeable under the following provision of state law:

- a. Section 9-201 of the Annotated Code of Maryland, Criminal Law (bribery).

14. It was a part of the conspiracy that each defendant agreed that a conspirator would commit two or more acts of racketeering activity in the conduct of the affairs of the enterprise.

#### **Manner and Means**

15. Among the means and methods by which the defendants and their associates conducted and participated in the conduct of the affairs of the enterprise and effected the objectives of the charged conspiracy were the following:

- a. Members of the enterprise and their associates provided, and promised to provide, monies totaling approximately \$495,000 to a cooperating witness to pass on to an individual believed to be an Immigration official in order to induce that official to illegally issue lawful permanent resident cards for themselves, and their family members, employees and associates.

- b. Members of the enterprise and their associates provided monies totaling approximately \$450,000 to a cooperating witness to pass on to an individual believed to be a state



tax official in order to induce that official to release over \$1.8 million in Maryland State tax assessments levied against businesses associated with the enterprise, its members and their associates.

c. Members of the enterprise and their associates concealed and disguised the nature, source and ownership of monies represented by a cooperating witness to be the proceeds of, and used to facilitate, unlawful activity.

#### Overt Acts

16. In furtherance of the charged conspiracy, and to effect the objects thereof, members of the conspiracy did perform, participate in, and commit the acts set forth in paragraph 29 of Count One of this Superseding Indictment, which are realleged and incorporated by reference as though fully set forth herein, and the following acts, among others:

(1) On or about January 27, 2005, **MOHAMMAD GUJJAR** met with a cooperating witness and showed him documents pertaining to the final sales and use tax assessments levied by the Comptroller of Maryland against Your Stop Food Market, and asked the cooperating witness if he could assist in finding someone who would abate the tax assessment for both Your Stop Food Market and Chicken Man Food Store in exchange for money.

(2) On or about April 7, 2005, **MOHAMMAD GUJJAR** and **MOHAMMAD IJAZ** met with a cooperating witness in Snow Hill, Maryland, and provided him with \$50,000 in United States currency to give to an official with the office of the Comptroller of Maryland as the first payment of a \$200,000 bribe to induce said official to illegally abate the sales and use tax assessments levied against Your Stop Food Market and Chicken Man Food Store.

(3) On or about April 21, 2005, **MOHAMMAD GUJJAR** and **JAVED IQBAL**



(1) met with a cooperating witness in Snow Hill, Maryland, and provided him with \$50,000 in United States currency to give to an official with the office of the Comptroller of Maryland as the second payment of a \$200,000 bribe to induce said official to illegally abate the sales and use tax assessments levied against Your Stop Food Market and Chicken Man Food Store.

(4) On or about April 28, 2005, **MOHAMMAD GUJJAR** and **MOHAMMAD IJAZ** met with a cooperating witness in Snow Hill, Maryland, and provided him with \$50,000 in United States currency to give to an official with the office of the Comptroller of Maryland as the third payment of a \$200,000 bribe to induce said official to illegally abate the sales and use tax assessments levied against Your Stop Food Market and Chicken Man Food Store.

(5) On or about May 31, 2005, **MOHAMMAD GUJJAR** and **JAVED IQBAL** (1) met with a cooperating witness in Snow Hill, Maryland, and provided him with \$50,000 in United States currency to give to an official with the office of the Comptroller of Maryland as the fourth and final payment of a \$200,000 bribe to induce said official to illegally abate the sales and use tax assessments levied against Your Stop Food Market and Chicken Man Food Store.

(6) On or about October 12, 2006, **MOHAMMAD GUJJAR** met with a cooperating witness in Ocean City, Maryland, and gave him documents reflecting Maryland sales and use tax assessments for three entities - Hut, Inc., Danbadi, Inc., and Mandi, Inc. - so that the cooperating witness could arrange for the payment of bribes to state tax officials in order to induce them to illegally abate the tax assessments. **MOHAMMAD GUJJAR** also gave the cooperating witness Immigration documents relating to his wife's application for United States citizenship and asked that the cooperating witness arrange to obtain naturalization papers for her through another bribe, the cost of which would be added to the cost of the state tax bribes.



(7) On or about October 17, 2006, **MOHAMMAD IJAZ** sent to a fax number provided to him by a cooperating witness, a facsimile with information regarding the Maryland sale and use tax assessments for two additional companies - Ashraf, Inc., and Fatimano, Inc. - for the purpose of having the cooperating witness add them to the list of businesses for which he would arrange the illegal abatement of their state tax assessments by way of bribes paid to state tax officials.

(8) On or about November 2, 2006, **SAEED AHMED** and **MOHAMMAD IJAZ** met with a cooperating witness in Snow Hill, Maryland, to discuss the details of bribing a Maryland state tax official in order to illegally obtain the abatement of sales and use taxes for five businesses.

(9) On or about November 29, 2006, **SAEED AHMED** met with a cooperating witness in Salisbury, Maryland, and provided him with \$50,000 in United States currency to give to an official with the office of the Comptroller of Maryland as the first payment of a \$300,000 bribe to induce said official to illegally abate the sales and use tax assessments levied against five entities: three trading as Thirsty's - Ashraf, Inc., Fatimano, Inc., and Hut, Inc.; two trading as Cross Road Food Mart - Danbadi, Inc., and Mandi, Inc. **SAEED AHMED** also discussed with the cooperating witness illegally obtaining lawful permanent resident cards for ten people through the payment of bribes to an Immigration official.

(10) On or about December 8, 2006, **SAEED AHMED** met with a cooperating witness in Salisbury, Maryland, and provided him with \$250,000 in United States currency to give to an official with the office of the Comptroller of Maryland as the second and final payment of a \$300,000 bribe to induce said official to illegally abate the sales and use tax assessments levied against five entities: three trading as Thirsty's - Ashraf, Inc., Fatimano, Inc., and Hut, Inc.; and two



trading as Cross Road Food Mart - Danbadi, Inc., and Mandi, Inc.

(11) On or about April 4, 2007, **MOHAMMAD IJAZ** met with a cooperating witness in Salisbury, Maryland, and advised the cooperating witness that he had three additional people who wished to illegally obtain lawful permanent resident cards through the payment of bribes to an Immigration official.

18 U.S.C. § 1962(d)

18 U.S.C. § 1961



**COUNTS THREE THROUGH FIFTEEN**

1. The allegations set forth in paragraphs 1 through 27 of Count One of this Superseding 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, directly and indirectly did corruptly give, offer and promise to a public official something of value, that is, a quantity of United States currency, with the intent to induce such public official to do and omit to do any act in violation of the lawful duty of such official, that is, to illegally issue permanent resident cards to the defendants as set forth below:

<b>Count</b>	<b>Dates</b>	<b>Defendants</b>	<b>Card Recipient(s)</b>	<b>Total Bribe Amount</b>
3	December 28, 2005 through October 12, 2006	<b>MOHAMMAD RIAZ GUJJAR, JAVED IQBAL (I), MOHAMMAD AKHTAR, SHAMSHER AKHTAR</b>	Mohammad Akhtar Shamsher Akhtar	\$25,000
4	January 23 through March 3, 2006	<b>MOHAMMAD RIAZ GUJJAR, JAVED IQBAL (I)</b>	Javed Iqbal (I)	\$15,000
5	March 10 through June 7, 2006	<b>MOHAMMAD RIAZ GUJJAR, JAVED IQBAL (I), AQEEL KHALID, ZAKIR MAHMOOD</b>	Aqueel Khalid Zakir Mahmood	\$40,000
6	August 1 through October 11, 2006	<b>MOHAMMAD RIAZ GUJJAR, JAVED IQBAL (I), MUHAMMAD ASHRAF</b>	Muhammad Ashraf	\$20,000





Count	Dates	Defendants	Card Recipient(s)	Total Bribe Amount
7	August 11, 2006 through January 11, 2007	<b>MOHAMMAD RIAZ GUJJAR, MOHAMMAD AKHTAR</b>	Relative of Mohammad Akhtar	\$20,000
8	August 15 through October 24, 2006	<b>MOHAMMAD RIAZ GUJJAR, JAVED IQBAL (I), MOHAMMAD ASIF</b>	Mohammad Asif	\$21,000
9	December 20, 2006 through August 30, 2007	<b>MOHAMMAD RIAZ GUJJAR, MOHAMMAD ASIF, HYDER ALI</b>	Hyder Ali	\$25,000
10	February 28 through April 4, 2007	<b>MOHAMMAD RIAZ GUJJAR, MOHAMMAD IJAZ, MOHAMMAD AKTHAR, IRSHAD AHMED</b>	Irshad Ahmed	\$25,000
11	August 15, 2007 through the date of this Superseding Indictment	<b>MOHAMMAD ASHRAF, NASAR AHMAD, ABID HUSSAIN</b>	Nasar Ahmad Abid Hussain	\$50,000
12	August 15, 2007 through the date of this Superseding Indictment	<b>MOHAMMAD RIAZ GUJJAR, JOHN DOE, a/k/a Unis, UPENDRAKUMAR SOMABHAI PATEL</b>	Upendrakumar Patel	\$25,000
13	August 30, 2007 through the date of this Superseding Indictment	<b>MOHAMMAD RIAZ GUJJAR, IDRISHBHAI DAUBHAI PATEL, MUHAMMAD IMRAN CHAUDHRY</b>	Idrishbhai Patel Mohammad Chaudhry	\$50,000



<b>Count</b>	<b>Dates</b>	<b>Defendants</b>	<b>Card Recipient(s)</b>	<b>Total Bribe Amount</b>
14	August 30, 2007 through the date of this Superseding Indictment	<b>SAEED AHMED, RASHID AHMED, a/k/a Choudhry Ahmed, MUHAMMAD RAZZAQ BUTT, OMAIR YOUNAS, JAVED IQBAL (II)</b>	Rashid Ahmed Muhammad Butt Omair Younas Javed Iqbal (II)	\$100,000
15	August 30, 2007 through the date of this Superseding Indictment	<b>MOHAMMAD RIAZ GUJJAR</b>	Relatives of Mohammad Gujjar	\$14,000

18 U.S.C. § 201(b)(1)(C)

18 U.S.C. § 201(a)(1)

18 U.S.C. § 2



**FORFEITURE ALLEGATION**

1. The allegations of this Indictment as contained in Count Two 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 1963.

2. As a result of the offense set forth in Count Two alleging a violation of Title 18, United States Code, Section 1962,

**MOHAMMAD RIAZ GUJJAR,  
MOHAMMAD IJAZ,  
JAVED IQBAL (I),  
SAEED AHMED,  
MOHAMMAD AKHTAR,  
and  
MOHAMMAD ASIF,**

shall forfeit to the United States:

a. any interest acquired and maintained in violation of said offense, which interests are subject to forfeiture to the United States pursuant to Title 18, United States Code, Section 1963(a)(1);

b. any interest in, security of, claim against, and property and contractual right of any kind affording a source of influence over, the enterprise named and described herein, which said defendants have established, operated, controlled, conducted, and participated in the conduct of, in violation of said offense, which interests, securities, claims, and rights are subject to forfeiture to the United States pursuant to Title 18, United States Code, Section 1963(a)(2); and

c. all property, real and personal, constituting, or derived from, any proceeds said defendants obtained, directly and indirectly, from racketeering activity in violation of said offense, which property is subject to forfeiture to the United States pursuant to Title 18, United States Code,



Section 1963(a)(3).

3. The interests of the defendants subject to forfeiture to the United States, pursuant to Title 18, United States Code, Sections 1963(a)(1), (a)(2) and (a)(3), include, but are not limited to:

- a. at least \$945,000 in United States currency;
- b. The defendant's ownership interests in the following businesses:
  - i. Snow Hill Star, Inc., a/k/a Snow Star, Inc., t/a Your Stop Food Market, located at 426 West Market Street, Snow Hill, Maryland; and
  - ii. Alpine, Inc., t/a/ Chicken Man Food Store, located at 429 West Market Street, Snow Hill, Maryland;

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

- i) cannot be located upon the exercise of due diligence;
- ii) has been transferred, sold to, or deposited with, a third party;
- iii) has been placed beyond the jurisdiction of the Court;
- iv) has been substantially diminished in value; or,
- v) 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 1963(m), to seek forfeiture of any other property of said defendants up to the value of the forfeitable property described above.

5. The above-named defendants, and each of them, are jointly and severally liable for



the forfeiture obligations as alleged above.

18 U.S.C. § 1963

\_\_\_\_\_  
Rod J. Rosenstein  
United States Attorney

A TRUE BILL:

\_\_\_\_\_  
Foreperson

\_\_\_\_\_  
Date