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F. #2017R01195

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U.S. DISTRICT COURT E.D.N.Y.

★ DEC 13 2017 ★

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

LONG ISLAND OFFICE

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UNITED STATES OF AMERICA

INDICTMENT

- against -

Cr. No. **CR-17 0690**
(T. 18, U.S.C., §§ 982(a)(1), 982(a)(2),
1344, 1956(a)(2)(A), 1956(a)(2)(B)(i),
1956(a)(2)(B)(ii), 1956(h), 2 and 3551 et
seq.; T. 21, U.S.C., § 853(p))

ZOOBIA SHAHNAZ,

Defendant.

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THE GRAND JURY CHARGES:

SEYBERT, J.

COUNT ONE
(Bank Fraud)

TOMLINSON, M.J.

1. In or about and between March 2017 and August 2017, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant ZOOBIA SHAHNAZ, together with others, did knowingly and intentionally execute and attempt to execute a scheme and artifice to defraud one or more financial institutions, to wit: American Express Bank, Chase Bank, Discover Bank and TD Bank (collectively, "the financial institutions"), the deposits of which were insured by the Federal Deposit Insurance Corporation, and to obtain money and funds under the custody and control of such financial institutions by means of materially false and fraudulent pretenses, representations, and promises.

(Title 18, United States Code, Sections 1344, 2 and 3551 et seq.)

COUNT TWO
(Conspiracy to Commit Money Laundering)

2. In or about and between March 2017 and August 2017, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant ZOOBIA SHAHNAZ, together with others, did knowingly and intentionally conspire to transport, transmit and transfer funds from a place in the United States to and through one or more places outside the United States, to wit: Pakistan, China and Turkey, with the intent to promote the carrying on of a specified unlawful activity, to wit: providing material support to a foreign terrorist organization, in violation of Title 18, United States Code, Section 2339B, and knowing that the funds involved in the transportation, transmission, and transfer would represent the proceeds of some form of unlawful activity and knowing that such transportation, transmission, and transfer would be designed in whole and in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, and to avoid a transaction reporting requirement under State and Federal law, contrary to Title 18, United States Code, Sections 1956(a)(2)(A), 1956(a)(2)(B)(i) and 1956(a)(2)(B)(ii).

(Title 18, United States Code, Sections 1956(h) and 3551 et seq.)

COUNT THREE
(Money Laundering to Support a Foreign Terrorist Organization)

3. In or about and between March 2017 and August 2017, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant ZOOBIA SHAHNAZ, together with others, did knowingly and intentionally

transport, transmit and transfer and attempt to transport, transmit and transfer funds, to wit: United States currency, from a place in the United States to and through one or more places outside the United States, to wit: Pakistan, China and Turkey, with the intent to promote the carrying on of a specified unlawful activity, to wit: providing material support to a foreign terrorist organization, in violation of Title 18, United States Code, Section 2339B.

(Title 18, United States Code, Sections 1956(a)(2)(A), 2 and 3551 et seq.)

COUNT FOUR

(Money Laundering to Conceal Proceeds of Unlawful Activity)

4. In or about and between March 2017 and August 2017, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant ZOOBIA SHAHNAZ, together with others, did knowingly and intentionally transport, transmit and transfer and attempt to transport, transmit and transfer funds, to wit: United States currency, from a place in the United States to and through one or more places outside the United States, to wit: Pakistan, China and Turkey, knowing that the funds involved in the transportation represented the proceeds of some form of unlawful activity and knowing that such transportation was designed in whole and in part to conceal and disguise the nature, location, source, ownership and control of the proceeds of specified unlawful activity, to wit: bank fraud, in violation of Title 18, United States Code, Section 1344.

(Title 18, United States Code, Sections 1956(a)(2)(B)(i), 2 and 3551 et seq.)

COUNT FIVE

(Money Laundering to Avoid Transaction Reporting Requirements)

5. In or about and between March 2017 and August 2017, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant ZOOBIA SHAHNAZ, together with others, did knowingly and intentionally transport, transmit and transfer and attempt to transport, transmit and transfer funds, to wit: United States currency, from a place in the United States to and through one or more places outside the United States, to wit: Pakistan, China and Turkey, knowing that the funds involved in the transportation represented the proceeds of some form of unlawful activity and knowing that such transportation was designed in whole and in part to avoid a transaction reporting requirements under State and Federal law.

(Title 18, United States Code, Sections 1956(a)(2)(B)(ii), 2 and 3551 et seq.)

CRIMINAL FORFEITURE ALLEGATIONS FOR
COUNT ONE

6. The United States hereby gives notice to the defendant that, upon her conviction of the offense charged in Count One, the government will seek forfeiture in accordance with Title 18, United States Code, Section 982(a)(2), which requires the forfeiture of any property, real or personal, involved in such offense, or any property traceable to such property.

7. If any of the above-described property, as a result of any act or omission of the defendant:

(a) cannot be located upon the exercise of due diligence;

- (b) has been transferred, or sold to or deposited with a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be

divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described in this forfeiture allegation.

(Title 18, United States Code, Section 982(a)(2); Title 21, United States Code, Section 853(p))

CRIMINAL FORFEITURE ALLEGATIONS FOR
COUNTS TWO THROUGH FIVE

8. The United States hereby gives notice to the defendant that, upon her conviction of any of the offenses charged in Counts Two through Five, the government will seek forfeiture in accordance with Title 18, United States Code, Section 982(a)(1), which requires the forfeiture of any property, real or personal, involved in such offenses, or any property traceable to such property.

9. If any of the above-described property, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred, or sold to or deposited with a third party;
- (c) has been placed beyond the jurisdiction of the court;

- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be

divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described in this forfeiture allegation.

(Title 18, United States Code, Section 982(a)(1); Title 21, United States Code, Section 853(p))

A TRUE BILL

FOREPERSON

BRIDGET M. ROHDE
ACTING UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK

No. _____

UNITED STATES DISTRICT COURT

EASTERN *District of* NEW YORK

CRIMINAL DIVISION

THE UNITED STATES OF AMERICA

vs.

ZOOBIA SHAHNAZ,

Defendant.

INDICTMENT

(T. 18, U.S.C., §§ 1344, 1956(a)(2)(A), 1956(a)(2)(B)(i),
1956(a)(2)(B)(ii), 1956(h), 2 and 3551 et seq.; T. 21, U.S.C., § 853(p))

A true bill

Foreperson

Filed in open court this _____ day,

of _____ A.D. 20 _____

Clerk

Bail, \$ _____

Artie McConnell, Assistant U.S. Attorney (631) 715-7825