



CMX/2007R00767

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

UNITED STATES OF AMERICA

v.

ABDUL REHMAN, a/k/a Rahim.
MIAN MUHAMMAD KASHIF,
a/k/a Saleem,
JOHN DOE, a/k/a Zulfi,
AHMAD JAMAL, a/k/a Laala,
RAJA ANSAR MOHAMMAD,
MUHAMMAD ANWAR PASHA,
AFZAL SHAIKH, a/k/a Zell,
MOHAMMAD SALIM, a/k/a Sonny

Defendants

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\* Criminal No. MJG-07-0418
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\* Conspiracy to Operate an Unlicensed
\* Money Transmission Business,
\* 18 U.S.C. §§ 371 and 1960(a);
\* Conspiracy to Launder Monetary
\* Instruments, 18 U.S.C. §§ 1956(h)
\* and 1956(a)(3)(B); Criminal Forfeiture,
\* 18 U.S.C. § 982
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SUPERSEDING INDICTMENT

The Grand Jury for the District of Maryland charges that:

COUNT ONE

At all times relevant to this Superseding Indictment:

- 1. ABDUL REHMAN, a/k/a Rahim (hereinafter ABDUL REHMAN) was born in Pakistan and resided in Belgium.
2. MIAN MUHAMMAD KASHIF, a/k/a Saleem (hereinafter MIAN KASHIF), was born in Pakistan and resided in Jamaica, New York.
3. JOHN DOE, a/k/a Zulfi, whose true identity remains unknown, resided in Brooklyn, New York.
4. AHMAD JAMAL, a/k/a Laala, was born in Pakistan and resided in Hollis, New York.



5. **RAJA ANSAR MOHAMMAD** (hereinafter **RAJA MOHAMMAD**) was born in Pakistan and resided in Brooklyn, New York.

6. **MUHAMMAD ANWAR PASHA** (hereinafter **MUHAMMAD PASHA**) was born in Pakistan and resided in Brooklyn, New York.

7. **AFZAL SHAIKH, a/k/a Zell**, was born in Pakistan and resided in Brooklyn, New York.

8. **MOHAMMAD SALIM, a/k/a Sonny**, was born in Bangladesh and resided in Patterson, New Jersey.

9. 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.

10. 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, a 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 if licensed to do so by the State, or if acting as an authorized delegate or agent of a State licensee. The same requirement applied in the State of New York, pursuant to New York Banking Law Article XIII-B, Section 641. In Maryland, a person who violated or failed to comply



with the State’s licensing 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. Pursuant to New York Banking Law Article XIII-B, Section 650, a person who violated or failed to comply with New York State’s licensing requirement was guilty of a misdemeanor; if they were unlicensed and knowingly conducted a single money transaction involving \$10,000 or more, they would be guilty of a felony. None of the defendants named herein were licensed to conduct a money transmission business in the State of Maryland or the State of New York, nor were they authorized delegates or agents of money transmitter licensees in the State of Maryland or the State of New York.

11. Afridi Trading, a/k/a Afridi Export (hereinafter 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, including weapons.

**The Charge**

12. Beginning in or about May 2006, and continuing through on or about the date of this Superseding Indictment, within the State and District of Maryland, the State of New York, Spain, Australia, and elsewhere,

**ABDUL REHMAN, a/k/a Rahim,  
MIAN MUHAMMAD KASHIF, a/k/a Saleem,  
JOHN DOE, a/k/a Zulfi,**



**AHMAD JAMAL, a/k/a Laala,  
RAJA ANSAR MOHAMMAD,  
MUHAMMAD ANWAR PASHA,  
AFZAL SHAIKH, a/k/a Zell,  
and  
MOHAMMAD SALIM, a/k/a Sonny,**

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

**Manner and Means of the Conspiracy**

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

a. The defendants would move large quantities of United States currency received from a cooperating witness in the United States to points overseas via the “hawala” method of currency transfer. **ABDUL REHMAN** was the primary point of contact for the cooperating witness and controlled all aspects of the hawala transactions, from receipt of monies from the cooperating witness in Maryland and New York, to delivery of monies to the cooperating witness, or his designated representative, at points overseas.

b. **ABDUL REHMAN** relied, in part, on an individual known only as “Haji”



to identify and direct the cooperating witness to those coconspirators who were responsible for receiving currency from the cooperating witness in the United States. These coconspirators included, among others known and unknown, **MIANKASHIF, JOHN DOE, a/k/a Zulfi, AHMAD JAMAL, RAJA MOHAMMAD, MUHAMMAD PASHA, AFZAL SHAIKH, and MOHAMMAD SALIM.**

b. Members of the conspiracy utilized coded language when speaking to each other and to the cooperating witness in Maryland, New York and elsewhere regarding the transfer of monies. Members of the conspiracy also utilized text messaging as a means by which to communicate instructions in Maryland and elsewhere to the cooperating witness and each other in a manner that would avoid detection by law enforcement. These text messages would include coded contact information, such as identifying information on dollar bills, which the cooperating witness was directed to provide to individuals who were either designated to pick up currency from the cooperating witness in the United States, or designated to provide hawala currency to the cooperating witness or his designated representative in Spain, Australia, and elsewhere.

c. In return for conducting money transfers for the cooperating witness totaling approximately \$1,475,000 in U.S. currency, **ABDUL REHMAN** and his associates retained a commission of approximately five to seven percent of the total amount of currency sought to be transferred on each occasion by the cooperating witness.

#### **Overt Acts**

14. In furtherance of the conspiracy, and to effect its object of generating monies and profits for its members, the defendants and other members of the conspiracy did perform, participate



in, and commit the following acts, among others:

(1) On or about July 12, 2006, at a location in Queens, New York, **MIAN KASHIF** accepted \$75,000 in United States currency from a cooperating witness for a hawala transaction involving a hand-to-hand transfer of cash in Spain.

(2) On or about July 18, 2006, at a location in Madrid, Spain, an individual known to members of the conspiracy gave a cooperating witness a quantity of hawala currency, specifically €55,000 in Euros.

(3) On or about December 18, 2006, **ABDUL REHMAN** spoke to a cooperating witness, who was in Maryland, and offered to coordinate a hawala transaction for the cooperating witness in January or February 2007 involving a hand-to-hand transfer of cash in Australia.

(4) On or about February 26, 2007, at a location in Brooklyn, New York, **JOHN DOE, a/k/a Zulfi**, accepted \$100,000 in U.S. currency from a cooperating witness for a hawala transaction involving a hand-to-hand transfer of cash in Australia.

(5) On or about February 26, 2007, at a location in Queens, New York, **AHMAD JAMAL** accepted \$100,000 in U.S. currency from a cooperating witness for a hawala transaction involving a hand-to-hand transfer of cash in Australia.

(6) On or about February 27, 2007, at a location in Brooklyn, New York, **JOHN DOE, a/k/a Zulfi**, accepted \$100,000 in U.S. currency from a cooperating witness for a hawala transaction involving a hand-to-hand transfer of cash in Australia.

(7) On or about February 27, 2007, at a location in Brooklyn, New York, an individual known to members of the conspiracy accepted \$100,000 in U.S. currency from a cooperating witness for a hawala transaction involving a hand-to-hand transfer of cash in Australia.



(8) On or about March 11, 2007, at a location in Sydney, Australia, an individual known to members of the conspiracy gave the designated representative of a cooperating witness a quantity of hawala currency, specifically 175,000 in Australian dollars.

(9) On or about March 26, 2007, at a location in Brooklyn, New York, an individual known to members of the conspiracy returned \$230,000 in U.S. currency to a cooperating witness, which represented a portion of the monies remaining from a partially completed hawala transaction originating on or about February 26, 2007.

(10) On or about June 5, 2007, at a location in Brooklyn, New York, **RAJA MOHAMMAD** accepted \$100,000 in U.S. currency from a cooperating witness for a hawala transaction involving a hand-to-hand transfer of cash in Spain.

(11) On or about June 5, 2007, at a location in Brooklyn, New York, **MUHAMMAD PASHA** accepted \$100,000 in U.S. currency from a cooperating witness for a hawala transaction involving a hand-to-hand transfer of cash in Spain.

(12) On or about June 6, 2007, at a location in Manhattan, New York, **AFZAL SHAIKH** met on two occasions with a cooperating witness and accepted two separate payments of \$100,000 in U.S. currency, totaling \$200,000, for a hawala transaction involving a hand-to-hand transfer of cash in Spain.

(13) On or about June 7, 2007, at a location in Manhattan, New York, an individual known to members of the conspiracy accepted \$100,000 in U.S. currency from a cooperating witness for a hawala transaction involving a hand-to-hand transfer of cash in Spain.

(14) On or about June 11, 2007, at a location in Barcelona, Spain, an individual known to members of the conspiracy gave a cooperating witness a quantity of hawala currency,





specifically €337,000 in Euros, of which 2,000 Euros represented the amount remaining from a partially completed hawala transaction originating on February 26, 2007.

(15) On or about July 3, 2007, at a location in Harford County, Maryland, **AFZAL SHAIKH** accepted \$300,000 in U.S. currency from a cooperating witness for a hawala transaction involving a hand-to-hand transfer of cash in Spain.

(16) On or about July 4, 2007, at a location in Baltimore, Maryland, **MOHAMMAD SALIM** accepted \$100,000 in U.S. currency from a cooperating witness for a hawala transaction involving a hand-to-hand transfer of cash in Spain.

(17) On or about July 4, 2007, at a location in Baltimore, Maryland, **AFZAL SHAIKH** accepted \$100,000 in U.S. currency from a cooperating witness for a hawala transaction involving a hand-to-hand transfer of cash in Spain.

(18) On or about July 10, 2007, at a location in Barcelona, Spain, **ABDUL REHMAN** gave a cooperating witness a quantity of hawala currency, specifically €333,830 in Euros.

18 U.S.C. § 371  
18 U.S.C. § 1960(a)  
18 U.S.C. § 1960(b)(1)(A)





**COUNT TWO**

1. The allegations set forth in paragraphs 1 through 11, 13 and 14 of Count One of this Superseding Indictment are realleged and incorporated by reference as though fully set forth herein.

2. At all times relevant to this Superseding Indictment, it was illegal, pursuant to Title 18, United States Code, Section 1956(a), to conduct a financial transaction with property represented to be proceeds of specified unlawful activity, or represented to be used to conduct or facilitate specified unlawful activity. Specified unlawful activity included, among other acts, drug trafficking in violation of Title 21, United States Code, Section 841. Both ICE and the FBI are authorized to investigate violations of the federal money laundering statute set forth in Title 18, United States Code, Section 1956.

3. Beginning in or about May 2006, and continuing through on or about the date of this Superseding Indictment, within the State and District of Maryland, the State of New York, Spain, Australia, and elsewhere,

**ABDUL REHMAN, a/k/a Rahim,  
JOHN DOE, a/k/a Zulfi,  
AHMAD JAMAL, a/k/a Laala,  
MUHAMMAD ANWAR PASHA,  
and  
MOHAMMAD SALIM, a/k/a Sonny,**

defendants herein, did knowingly and intentionally combine, conspire, confederate, and agree with each other, and with persons known and unknown to the Grand Jury, to knowingly and willfully conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce involving property represented by an individual acting at the direction, and with the approval, of a Federal official authorized to investigate violations of Title 18, United States Code, Section 1956,



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

#### **Manner and Means of the Conspiracy**

4. 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 receive large quantities of United States currency from a cooperating witness in the United States, which he represented to be proceeds of, and related to, his illegal drug trafficking. The defendants would then arrange to transfer those monies to points overseas via the “hawala” method of currency transfer.

b. Other methods and means utilized by the defendants are the same as those set forth in paragraph 13 of Count One of this Superseding Indictment, and are realleged and incorporated by reference as though fully set forth herein.

#### **Overt Acts**

5. 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 14 of Count One of this Superseding Indictment, which are realleged and incorporated by reference as though fully set forth herein.

18 U.S.C. § 1956(h)  
18 U.S.C. § 1956(a)(3)(B)  
18 U.S.C. § 1956(c)(7)



**FORFEITURE ALLEGATION**

1. The allegations of this Superseding Indictment as contained in Count One 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 offense set forth in Count One,

**ABDUL REHMAN, a/k/a Rahim,  
MIAN MUHAMMAD KASHIF, a/k/a Saleem,  
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AHMAD JAMAL, a/k/a Laala,  
RAJA ANSAR MOHAMMAD,  
MUHAMMAD ANWAR PASHA,  
AFZAL SHAIKH, a/k/a Zell,  
and  
MOHAMMAD SALIM, a/k/a Sonny,**

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 aforestated 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. \$1,475,000.00 in United States currency, and all interest and proceeds traceable thereto, in that such sum, in aggregate, is property which was involved in the aforesaid offenses, or is traceable to such property, in violation of Title 18, United States Code, Sections 982(a)(1), 1956(a)(3)(B), 1956(h) and 1960(a).

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



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

it is the intent of the United States, pursuant to Title 18, United States Code, Section 982(a)(1), to seek forfeiture of any other property of said defendants up to the value of the forfeitable property, that is, \$1,475,000.00.

18 U.S.C. § 982(a)(1)

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

A TRUE BILL:

\_\_\_\_\_  
Foreperson

\_\_\_\_\_  
Date