

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - - X

UNITED STATES OF AMERICA :

- v. - :

ZAMAN MAHABUB, :

a/k/a "Faisel," :

a/k/a "Mahabubuz Zaman," : SEALED INDICTMENT

SYED AL HOSSAIN, :

a/k/a "Shumon," : 13 Cr. ()

MOHAMMED KHALIL, :

a/k/a "Robin," :

a/k/a "Amwal Hassam," :

MOHAMMED NAZRUL ISLAM, :

HAMID KHAN, :

a/k/a "Abdul Hamid," :

MOHAMMED GOLAM AZAM, :

a/k/a "Shohaq," :

a/k/a "Faiz Ahmed Khan," :

a/k/a "Kamal Pasha," :

AKM GOLAM HOSSAIN, :

FNU LNU, :

a/k/a "Mohammed Uddin," :

a/k/a "Saariei Aamebie," :

a/k/a "Panka," :

a/k/a "James Palmer," :

FNU LNU, :

a/k/a "Mohammed Sheikh Islam," :

AKTHER RAHMAN, :

ABDUR RAZZAK, :

KHAIRUL ISLAM, :

DIPOK RANA, :

a/k/a "Noor Hosson," :

MD REZA, :

a/k/a "Mohammad Reza," :

a/k/a "Jashim Md Reza," :

Defendants. :

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13: CRIM 908

COUNT ONE
(Bank Fraud Conspiracy)

The Grand Jury charges:

OVERVIEW OF THE SCHEME

1. From at least in or about June 2009, up to and including in or about November 2012, in the Southern District of New York and elsewhere, ZAMAN MAHABUB, a/k/a "Faisel," a/k/a "Mahabubuz Zaman," SYED AL HOSSAIN, a/k/a "Shumon," MOHAMMED KHALIL, a/k/a "Robin," a/k/a "Amwal Hassam," MOHAMMED NAZRUL ISLAM, HAMID KHAN, a/k/a "Abdul Hamid," MOHAMMED GOLAM AZAM, a/k/a "Shohaq," a/k/a "Faiz Ahmed Khan," a/k/a "Kamal Pasha," AKM GOLAM HOSSAIN, FNU LNU, a/k/a "Mohammed Uddin," a/k/a "Saariei Aamebie," a/k/a "Panka," a/k/a "James Palmer," FNU LNU, a/k/a "Mohammed Sheikh Islam," AKTHER RAHMAN, ABDUR RAZZAK, KHAIRUL ISLAM, DIPOK RANA, a/k/a "Noor Hosson," MD REZA, a/k/a "Mohammad Reza," a/k/a "Jashim Md Reza," the defendants, and their co-conspirators orchestrated and carried out an elaborate check-kiting scheme.

2. As part of the scheme, the defendants and their co-conspirators created counterfeit checks, deposited those counterfeit checks into bank accounts they had opened in the names of sham companies in order to fraudulently inflate the balances in those accounts, and then withdrew funds from those bank accounts before the financial institutions were able to determine the

fraudulent nature of the checks. The scheme entailed the deposit of thousands of counterfeit checks into bank accounts at approximately 15 different banks, resulting in aggregate losses to those banks of at least \$8 million.

3. The scheme generally worked as follows:

a. Leaders and managers of the conspiracy would recruit individuals (the "acountholders") who were willing to open bank accounts in the names of sham companies. The acountholders often were provided with false identities, including names and social security numbers, and were given false identification documents, including false United States visas.

b. The defendants would incorporate a sham company, often using a false identity associated with the acountholder as the name of the president of the sham company.

c. In order to create the false appearance that the sham company was a real company with actual operations, the defendants would establish utilities, such as telephone, gas or electric service, in the name of the sham company.

d. At the direction of one of the leaders or managers of the conspiracy, an acountholder would then open one or more bank accounts in the name of the sham business. The acountholder was generally instructed to make small legitimate deposits at first so that the banks would make funds immediately available upon future

fraudulent deposits.

e. The defendants obtained copies of legitimate checks and used them to create counterfeit checks. The counterfeit checks typically contained the payor account information from the legitimate checks and were made payable to the sham company.

f. The accountholder was then given the counterfeit checks to deposit into the sham company's bank accounts at various banks. The accountholder often made deposits at numerous branches of the same bank on the same day. These deposits often were made on a Thursday or Friday so that the defendants could withdraw the illegal proceeds over the weekend when the banks were closed and were less likely to determine that the checks were counterfeit.

g. Once the defendants confirmed that funds from the counterfeit checks were available for withdrawal, the accountholders were directed to withdraw the funds from the counterfeit checks, typically over the weekend and often in amounts just under \$10,000. The defendants often withdrew the funds from global cash access machines at casinos in Atlantic City, New Jersey, which did not have daily withdrawal limits. The withdrawals were also made from automatic teller machines and tellers at bank branches at various locations in New York and New Jersey, including in Manhattan. The accountholders often used false identification documents, including false United States visas, when making the withdrawals.

h. Once the bank determined that the checks were counterfeit, often on the following Monday, the bank accounts were abandoned and new accounts were opened and used in the same way.

STATUTORY ALLEGATIONS

4. From at least in or about June 2009, up to and including at least in or about November 2012, in the Southern District of New York and elsewhere, ZAMAN MAHABUB, a/k/a "Faisel," a/k/a "Mahabubuz Zaman," SYED AL HOSSAIN, a/k/a "Shumon," MOHAMMED KHALIL, a/k/a "Robin," a/k/a "Amwal Hassam," MOHAMMED NAZRUL ISLAM, HAMID KHAN, a/k/a "Abdul Hamid," MOHAMMED GOLAM AZAM, a/k/a "Shohaq," a/k/a "Faiz Ahmed Khan," a/k/a "Kamal Pasha," AKM GOLAM HOSSAIN, FNU LNU, a/k/a "Mohammed Uddin," a/k/a "Saariei Aamebie," a/k/a "Panka," a/k/a "James Palmer," FNU LNU, a/k/a "Mohammed Sheikh Islam," AKTHER RAHMAN, ABDUR RAZZAK, KHAIRUL ISLAM, DIPOK RANA, a/k/a "Noor Hosson," MD REZA, a/k/a "Mohammad Reza," a/k/a "Jashim Md Reza," the defendants, and others known and unknown, willfully and knowingly combined, conspired, confederated, and agreed together and with each other to commit an offense against the United States, to wit, bank fraud, in violation of Title 18, United States Code, Section 1344.

5. It was a part and an object of the conspiracy that ZAMAN MAHABUB, a/k/a "Faisel," a/k/a "Mahabubuz Zaman," SYED AL HOSSAIN, a/k/a "Shumon," MOHAMMED KHALIL, a/k/a "Robin," a/k/a "Amwal Hassam," MOHAMMED NAZRUL ISLAM, HAMID KHAN, a/k/a "Abdul Hamid,"

MOHAMMED GOLAM AZAM, a/k/a "Shohaq," a/k/a "Faiz Ahmed Khan," a/k/a "Kamal Pasha," AKM GOLAM HOSSAIN, FNU LNU, a/k/a "Mohammed Uddin," a/k/a "Saariei Aamebie," a/k/a "Panka," a/k/a "James Palmer," FNU LNU, a/k/a "Mohammed Sheikh Islam," AKTHER RAHMAN, ABDUR RAZZAK, KHAIRUL ISLAM, DIPOK RANA, a/k/a "Noor Hosson," MD REZA, a/k/a "Mohammad Reza," a/k/a "Jashim Md Reza," the defendants, and others known and unknown, willfully and knowingly would and did execute and attempt to execute a scheme and artifice to defraud financial institutions, the deposits of which were then insured by the Federal Deposit Insurance Corporation, and to obtain moneys, funds, credits, assets, securities and other property owned by, and under the custody and control of, said financial institutions, by means of false and fraudulent pretenses, representations, and promises, to wit, the defendants engaged in a scheme to deposit counterfeit checks into bank accounts, in order to fraudulently inflate the balances in those accounts, and then withdraw the credited funds before the banks were able to determine the counterfeit nature of the checks.

OVERT ACTS

6. In furtherance of the conspiracy and to effect the illegal object thereof, ZAMAN MAHABUB, a/k/a "Faisel," a/k/a "Mahabubuz Zaman," SYED AL HOSSAIN, a/k/a "Shumon," MOHAMMED KHALIL, a/k/a "Robin," a/k/a "Amwal Hassam," MOHAMMED NAZRUL ISLAM, HAMID KHAN, a/k/a "Abdul Hamid," MOHAMMED GOLAM AZAM, a/k/a "Shohaq," a/k/a

"Faiz Ahmed Khan," a/k/a "Kamal Pasha," AKM GOLAM HOSSAIN, FNU LNU, a/k/a "Mohammed Uddin," a/k/a "Saariei Aamebie," a/k/a "Panka," a/k/a "James Palmer," FNU LNU, a/k/a "Mohammed Sheikh Islam," AKTHER RAHMAN, ABDUR RAZZAK, KHAIRUL ISLAM, DIPOK RANA, a/k/a "Noor Hosson," MD REZA, a/k/a "Mohammad Reza," a/k/a "Jashim Md Reza," the defendants, and others known and unknown, committed the following overt acts, among others, in the Southern District of New York and elsewhere:

a. In or about December 2010, ZAMAN MAHABUB, a/k/a "Faisel," a/k/a "Mahabubuz Zaman," the defendant, provided a co-conspirator not named herein with the false identity "Noor Hosson" for use in establishing sham companies and bank accounts.

b. On or about January 5, 2010, SYED AL HOSSAIN, a/k/a "Shumon," MOHAMMED KHALIL, a/k/a "Robin," a/k/a "Amwal Hassam," the defendants, and others known and unknown, traveled to Atlantic City, New Jersey to withdraw the proceeds of counterfeit checks.

c. On or about December 31, 2009, MOHAMMED KHALIL, a/k/a "Robin," a/k/a "Amwal Hassam," the defendant, opened a bank account in the name of a sham company ("Company-1") using the false identity "Amwal Hassam" ("Account-1").

d. On or about March 26, 2010, KHALIL deposited four counterfeit checks totaling approximately \$35,300 into Account-1.

e. In or about mid-2010, MOHAMMED NAZRUL ISLAM, the defendant, sold copies of legitimate checks to a co-conspirator not named herein so that they could be used to create counterfeit checks.

f. On or about January 31, 2011, HAMID KHAN, a/k/a "Abdul Hamid," the defendant, opened a bank account in the name of a sham company ("Company-2") using a false identity ("Account-2").

g. On or about May 12, 2011, HAMID KHAN deposited two counterfeit checks totaling approximately \$20,000 into Account-2 at bank branches in Manhattan, New York.

h. In or about January 2011, MOHAMMED GOLAM AZAM, a/k/a "Shohaq," a/k/a "Faiz Ahmed Khan," a/k/a "Kamal Pasha," the defendant, provided a co-conspirator not named herein with documents for use in opening a bank account in the name of a sham company ("Company-3") using the false identity "MD Khan."

i. On or about January 25, 2011, a co-conspirator not named herein opened a bank account in the name of Company-3 using the false identity "MD Khan" ("Account-3").

j. On or about April 28 and 29, 2011, a co-conspirator not named herein deposited three counterfeit checks totaling approximately \$23,400 into Account-3 at bank branches in Manhattan and Queens, New York.

k. On or about June 10, 2010, AKM GOLAM HOSSAIN, the defendant, filed incorporation documents for a sham company ("Company-4").

l. On or about July 21, 2010, FNU LNU, a/k/a "Mohammed Uddin," a/k/a "Saariei Aamebie," a/k/a "Panka," a/k/a "James Palmer," the defendant, opened a bank account in the name of Company-4 using the identity "Mohammed Uddin" ("Account-4").

m. On or about December 9 and 10, 2010, FNU LNU, a/k/a "Mohammed Uddin," a/k/a "Saariei Aamebie," a/k/a "Panka," a/k/a "James Palmer," deposited two counterfeit checks totaling approximately \$15,000 into Account-4 at bank branches in Manhattan and Queens, New York.

n. On or about July 12, 2010, FNU LNU, a/k/a "Mohammed Sheikh Islam," the defendant, opened a bank account in the name of a sham company ("Company-5") using the identity "Mohammed Sheikh Islam" ("Account-5").

o. On or about October 7, 2010, FNU LNU, a/k/a "Mohammed Sheikh Islam," deposited a counterfeit check in the amount of \$10,400 into Account-5 at a bank branch in Manhattan, New York.

p. On or about June 21, 2010, AKTHER RAHMAN, the defendant, opened a bank account ("Account-6") in the name of a sham company ("Company-6").

q. On or about October 29, 2010, at a bank branch in Manhattan, RAHMAN deposited two counterfeit checks totaling approximately \$15,000 into an account held in the name of Company-6.

r. On or about August 16, 2010, ABDUR RAZZAK, the defendant, opened a bank account ("Account-7") in the name of a sham company ("Company-7").

s. On or about October 21, 2010, RAZZAK deposited a counterfeit check in the amount of \$13,400 into Account-7 at a bank branch in New Jersey.

t. On or about November 15, 2010, KHAIRUL ISLAM, the defendant, opened a bank account ("Account-8") in the name of a sham company ("Company-8").

u. On or about March 7, 2011, KHAIRUL ISLAM deposited a counterfeit check in the amount of \$19,800 into Account-8 at a bank branch in Manhattan, New York.

v. On or about January 11, 2011, DIPOK RANA, a/k/a "Noor Hosson," the defendant, opened bank accounts in the names of sham companies ("Company-9 and Company-10").

w. On or about April 28 and 29, 2011, RANA deposited five counterfeit checks totaling approximately \$38,250 into accounts in the names of Company-9 and Company-10 at bank branches in Manhattan, New York.

x. On or about April 6, 2012, MD REZA, a/k/a "Mohammad Reza," a/k/a "Jashim Md Reza," opened a bank account ("Account-9") in the name of a sham company ("Company-11").

y. On or about November 16, 2012, REZA deposited five counterfeit checks totaling approximately \$23,000 into Account-9 at various bank branches, including at least two branches in Manhattan, New York.

(Title 18, United States Code, Section 1349.)

COUNT TWO

(Identification Document Fraud Conspiracy)

The Grand Jury further charges:

7. The allegations contained in paragraphs 1 through 3 and 6 are hereby repeated, realleged and incorporated by reference as if fully set forth herein.

8. From in or about 2009, up to and including at least in or about November 2012, in the Southern District of New York and elsewhere, MOHAMMED KHALIL, a/k/a "Robin," a/k/a "Amwal Hassam," HAMID KHAN, a/k/a "Abdul Hamid," MOHAMMED GOLAM AZAM, a/k/a "Shohaq," a/k/a "Faiz Ahmed Khan," a/k/a "Kamal Pasha," FNU LNU, a/k/a "Mohammed Uddin," a/k/a "Saariei Aamebie," a/k/a "Panka," a/k/a "James Palmer," FNU LNU, a/k/a "Mohammed Sheikh Islam," AKTHER RAHMAN, DIPOK RANA, a/k/a "Noor Hosson," MD REZA, a/k/a "Mohammad Reza," a/k/a "Jashim Md Reza," the defendants, together with others

known and unknown, willfully and knowingly combined, conspired, confederated, and agreed together and with each other to commit an offense against the United States, to wit, identification document fraud, in violation of Title 18, United States Code, Section 1028(a)(1).

9. It was a part and an object of the conspiracy that MOHAMMED KHALIL, a/k/a "Robin," a/k/a "Amwal Hassam," HAMID KHAN, a/k/a "Abdul Hamid," MOHAMMED GOLAM AZAM, a/k/a "Shohaq," a/k/a "Faiz Ahmed Khan, a/k/a "Kamal Pasha," FNU LNU, a/k/a "Mohammed Uddin," a/k/a "Saariei Aamebie," a/k/a "Panka," a/k/a "James Palmer," FNU LNU, a/k/a "Mohammed Sheikh Islam," AKTHER RAHMAN, DIPOK RANA, a/k/a "Noor Hosson," MD REZA, a/k/a "Mohammad Reza," a/k/a "Jashim Md Reza," the defendants, and others known and unknown, willfully and knowingly, and without lawful authority, would and did produce an identification document, authentication feature, and false identification document, in and affecting interstate and foreign commerce, in violation of Title 18, United States Code, Section 1028(a)(1).

OVERT ACTS

10. In furtherance of the conspiracy and to effect the illegal object thereof, MOHAMMED KHALIL, a/k/a "Robin," a/k/a "Amwal Hassam," HAMID KHAN, a/k/a "Abdul Hamid," MOHAMMED GOLAM AZAM, a/k/a

"Shohaq," a/k/a "Faiz Ahmed Khan," a/k/a "Kamal Pasha," FNU LNU, a/k/a "Mohammed Uddin," a/k/a "Saariei Aamebie," a/k/a "Panka," a/k/a "James Palmer," FNU LNU, a/k/a "Mohammed Sheikh Islam," AKTHER RAHMAN, DIPOK RANA, a/k/a "Noor Hosson," MD REZA, a/k/a "Mohammad Reza," a/k/a "Jashim Md Reza," the defendants, and others known and unknown, committed the following overt acts, among others, in the Southern District of New York and elsewhere:

a. In or about September 2010, a co-conspirator not named herein created a fraudulent United States visa bearing the name "Saariei Aamebie" and a photograph of FNU LNU, a/k/a "Mohammad Uddin," a/k/a "Saariei Aamebie, a/k/a "Panka," the defendant.

b. On or about October 10, 2010, MOHAMMAD SHEIKH ISLAM, the defendant, used a fraudulent United States visa as identification to withdraw money at a casino in Atlantic City, New Jersey.

c. On or about December 27, 2004, HAMID KHAN, a/k/a "Abdul Hamid," the defendant, obtained a New York driver's license in the name of "Abdul Hamid."

d. On or about December 14, 2009, MOHAMMED KHALIL a/k/a "Robin," a/k/a "Amwal Hassam," the defendant, obtained a New York driver's license in the name of "Amwal Hassam."

e. On or about May 3, 2010, AKTHER RAHMAN, the defendant, obtained a New York driver's license using a fraudulent United States visa.

f. On or about April 14, 2010, MOHAMMED GOLAM AZAM, a/k/a "Shohaq," a/k/a "Faiz Ahmed Khan," a/k/a "Kamal Pasha," the defendant, obtained a New York driver's license using a fraudulent United States visa bearing his photograph and the name "Faiz Ahmed Khan."

g. On or about March 2, 2012, in Manhattan, New York, MD REZA, a/k/a "Mohammad Reza," a/k/a "Jashim Md Reza," the defendant, obtained a New York driver's license in the name of "Mohammad Reza."

h. On or about December 4, 2009, DIPOK RANA, a/k/a "Noor Hosson," the defendant, obtained a New York driver's license in the name of "Noor Hosson."

(Title 18, United States Code, Section 1028(f).)

FORFEITURE ALLEGATIONS

11. As the result of committing the offense alleged in Count One of this Indictment, ZAMAN MAHABUB, a/k/a "Faisel," SYED AL HOSSAIN, a/k/a "Shumon," MOHAMMED KHALIL, a/k/a "Robin," a/k/a "Amwal Hassam," MOHAMMED NAZRUL ISLAM, HAMID KHAN, a/k/a "Abdul Hamid," MOHAMMED GOLAM AZAM, a/k/a "Shohaq," a/k/a "Faiz Ahmed Khan," a/k/a "Kamal Pasha," AKM GOLAM HOSSAIN, FNU LNU, a/k/a "Mohammed Uddin," a/k/a "Saariei Aamebie," a/k/a "Panka," a/k/a "James Palmer," FNU LNU, a/k/a "Mohammed Sheikh Islam," AKTHER RAHMAN, ABDUR RAZZAK, KHAIRUL ISLAM, DIPOK RANA, a/k/a "Noor Hosson," MD REZA,

a/k/a "Mohammad Reza," the defendants, shall forfeit to the United States, pursuant to 18 U.S.C. § 982(a)(2)(A), any property constituting or derived from proceeds obtained directly or indirectly as a result of the bank fraud offense, including but not limited to approximately \$8,000,000, in that such sum in aggregate is property representing the amount of proceeds obtained as a result of the offense charged in Count One.

12. As the result of committing the offense alleged in Count Two of this Indictment, MOHAMMED KHALIL, a/k/a "Robin," a/k/a "Amwal Hassam," MOHAMMED NAZRUL ISLAM, HAMID KHAN, a/k/a "Abdul Hamid," MOHAMMED GOLAM AZAM, a/k/a "Shohaq," a/k/a "Faiz Ahmed Khan," a/k/a "Kamal Pasha," FNU LNU, a/k/a "Mohammed Uddin," a/k/a "Saariei Aamebie," a/k/a "Panka," a/k/a "James Palmer," FNU LNU, a/k/a "Mohammed Sheikh Islam," AKTHER RAHMAN, DIPOK RANA, a/k/a "Noor Hosson," MD REZA, a/k/a "Mohammad Reza," the defendants, shall forfeit to the United States, pursuant to 18 U.S.C. § 982(a)(2)(B), any and all property constituting or derived from proceeds obtained directly or indirectly as a result of the offense, and, pursuant to 18 U.S.C. § 1028(b), any personal property used or intended to be used to commit the offense charged in Count Two.

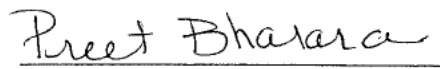
13. If any of the property described above in paragraphs 11 and 12, as being subject to forfeiture, as a result of any act or omission of the defendants,

- 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 subdivided without difficulty;

it is the intention 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.

(Title 18, United States Code, Sections 981, 982, 1028, 1344, 1349; Title 21, United States Code, Section 853(p); Title 31, United States Code, Sections 5317, 5324; and Title 28, United States Code, Section 2461.)


FOREPERSON


PREET BHARARA
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA

- v. -

ZAMAN MAHABUB, ET AL.,

Defendants.

INDICTMENT

(Title 18, United States Code, Sections 1349, 1028(f).)

PREET BHARARA

United States Attorney.

A TRUE BILL

Foreperson.
