

CMM:CLK:DEZ/TTF
F. #2019R01143

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
----- X

UNITED STATES OF AMERICA

- against -

NATASHA KHAN,

Defendant.

----- X

THE UNITED STATES ATTORNEY CHARGES:

INTRODUCTION

At all times relevant to this Information:

1. The defendant NATASHA KHAN was a resident of Elmont, New York.
2. In or about and between August 2014 and August 2019, within the Eastern District of New York and elsewhere, the defendant NATASHA KHAN, together with others, engaged in a direct-mail scheme that sent fraudulent prize notification mailings to thousands of consumers across the United States. The mailings induced consumers (the "Victims") to pay a fee in exchange for a falsely promised large cash prize. The object and purpose of the scheme was to obtain money from the Victims by means of false and fraudulent statements and material concealments of fact in the mailings. None of the Victims who sent a fee in response to a fraudulent prize notification mailing from the direct-mail scheme ever received a large cash prize.

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

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LONG ISLAND OFFICE

INFORMATION

CR 21 609

Cr. No.

(T. 18, U.S.C., §§ 981(a)(1)(C), 1349
and 3551 et seq.; T. 21, U.S.C.,
§ 853(p); T. 28, U.S.C., § 2461(c))

HURLEY, J.

TISCIONE, M.J.

CONSPIRACY TO COMMIT MAIL FRAUD

3. The allegations contained in paragraphs one and two are realleged and incorporated as if fully set forth in this paragraph.

4. In or about and between August 2014 and August 2019, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant NATASHA KHAN, together with others, did knowingly and intentionally conspire to devise a scheme and artifice to defraud the Victims, and to obtain money and property from the Victims by means of one or more materially false and fraudulent pretenses, representations and promises, and for the purpose of executing such scheme and artifice, did place matters and things in a post office and authorized depository for mail matter, to be sent and delivered by the United States Postal Service, and did take and receive therefrom, any such matter and thing, contrary to Title 18, United States Code, Section 1341.

(Title 18, United States Code, Sections 1349 and 3551 et seq.)

CRIMINAL FORFEITURE ALLEGATION

5. The United States hereby gives notice to the defendant that, upon her conviction of the offense charged herein, the government will seek forfeiture in accordance with Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), which require any person convicted of such offense to forfeit any property, real or personal, constituting, or derived from, proceeds obtained directly or indirectly as a result of such offense.

6. If any of the above-described forfeitable 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 forfeitable property described in the forfeiture allegation.

(Title 18, United States Code, Section 981(a)(1)(C); Title 21, United States Code, Section 853(p); Title 28, United States Code, Section 2461(c)).



GUSTAV W. EYLER
DIRECTOR
CONSUMER PROTECTION BRANCH



BREON S. PEACE
UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK

F. # 2019R00648
FORM DBD-34
JUN. 85

No. _____

UNITED STATES DISTRICT COURT

EASTERN District of NEW YORK

CRIMINAL DIVISION

THE UNITED STATES OF AMERICA

vs.

NATASHA KHAN,

Defendant.

INFORMATION

(T. 18, U.S.C., §§ 981(a)(1)(C), 1349 and 3551 et seq.; T. 21, U.S.C., § 853(p); and T. 28, U.S.C., § 2461(c).)

A true bill.

Foreperson

Filed in open court this _____ *day,*

of _____ *A.D. 20* _____

Clerk

Bail, \$ _____

Charles P. Kelly, Assistant U.S. Attorney (631) 715-7866