FILED
CLERK, U.S. DISTRICT COURT
10/15/25
CENTRAL DISTRICT OF CALIFORNIA
BY: MRV DEPUTY

UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

June 2025 Grand Jury

UNITED STATES OF AMERICA, Plaintiff, v. SAMAN DELAFRAZ and BENJAMIN DANESHGAR, Defendants.	CR No. 2:25-cr-00836-GW I N D I C T M E N T [18 U.S.C. § 1956(h): Conspiracy to Commit Money Laundering; 18 U.S.C. § 982(a)(1): Criminal Forfeiture]

The Grand Jury charges:

[18 U.S.C. § 1956(h)]

INTRODUCTORY ALLEGATIONS

At all times relevant to this Indictment:

1. Defendant SAMAN DELAFRAZ was a resident of the Central District of California.

2. Defendant BENJAMIN DANSHEGAR was a resident of the Central District of California.

3. Defendants DELAFRAZ and DANESHGAR have operated using the business name Wireless World since 2015. During that time, they have operated using a variety of other business names, including MaxOutDeals, MaxoutDeald, Mobile Deals, Inc., Global Wireless, West

Coast Distributors, Virtual Wireless, Wireless Deals, Wireless Warehouse Direct, Gadget Stop, and 2D Distribution.

4. “Cathay Account #1” was a bank account established and controlled by defendants DELAFRAZ and DANESHGAR, with an account number ending in 5080 at Cathay Bank in Los Angeles, California.

5. “Cathay Account #2” was a bank account established and controlled by defendants DELAFRAZ and DANESHGAR, with an account number ending in 2155 at Cathay Bank in Los Angeles, California.

6. “Cathay Account #3” was a bank account established and controlled by defendants DELAFRAZ and DANESHGAR, with an account number ending in 1761 at Cathay Bank in Los Angeles, California (together with Cathay Account #1 and Cathay Account #2, the “Cathay Accounts”).

A. OBJECT OF THE CONSPIRACY

7. Beginning on a date unknown but no later than 2019 and continuing through September 16, 2025, in Los Angeles County, within the Central District of California, and elsewhere, defendant DELAFRAZ, defendant DANESHGAR, unindicted coconspirator Blade Bai (“UICC Bai”), unindicted coconspirator Juan Carlos Thola (“UICC Thola”), unindicted coconspirator 1 (“UICC 1”), unindicted coconspirator 2 (“UICC 2”), unindicted coconspirator 3 (“UICC 3”), unindicted coconspirator 4 (“UICC 4”), unindicted coconspirator 5 (“UICC 5”), conspired with others known and unknown to the Grand Jury to knowingly conduct and attempt to conduct financial transactions affecting interstate and foreign commerce, which transactions involved the proceeds of specified unlawful activity, namely, wire fraud, in violation of Title 18, United States Code, Section 1343, bank fraud, in violation of Title 18, United States Code, Section

1344, interstate transportation of stolen property, in violation of Title 18, United States Code, Section 2314, sale of stolen property, in violation of Title 18, United States Code, Section 2315, and identity theft, in violation of Title 18, United States Code, Section 1028, with the intent to promote the carrying on of specified unlawful activity, knowing that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(A)(i).

B. THE MANNER AND MEANS OF THE CONSPIRACY

8. The object of the conspiracy was to be accomplished in substance as follows:

a. Defendants DELAFRAZ and DANESHGAR procured merchandise, largely consisting of high value consumer electronics, from a variety of illicit sources, including but not limited to the following:

i. Consumer electronics purchased by UICC Bai and his confederates using gift cards that were funded with the proceeds of fraud;

ii. Consumer electronics provided by UICC Thola and his confederates that were the proceeds of thefts and/or fraud;

iii. Gift cards provided by UICC 1 that were funded with the proceeds of fraud;

iv. Consumer electronics purchased by UICC 2 using gift cards that were funded with the proceeds of fraud;

v. Consumer electronics purchased by UICC 3 and UICC 4 using gift cards that were funded with the proceeds of fraud;

vi. Consumer electronics purchased by defendants DELAFRAZ and DANESHGAR using, without authorization, bank cards belonging to third parties; and

vii. Consumer electronics purchased by defendants DELAFRAZ and DANESHGAR using gift cards that were funded with the proceeds of fraud.

b. Defendants DELAFRAZ and DANESHGAR, and UICC 5, operated warehouses where the merchandise was delivered by suppliers.

c. Defendants DELAFRAZ and DANESHGAR paid for merchandise using cash, checks, domestic wire transfers, gift cards, and foreign bank transfers.

d. Defendants DELAFRAZ and DANESHGAR, and UICC 5, sold the merchandise to domestic and international customers.

e. Defendants DELAFRAZ and DANESHGAR received payment for the merchandise, including to the Cathay Accounts.

C. OVERT ACTS

9. In furtherance of the conspiracy, and to accomplish its objects, on or about the dates set forth below, defendants DELAFRAZ and DANESHGAR, together with others known and unknown to the Grand Jury, including UICC Bai, UICC Juan Carlos, UICC 1, UICC 2, UICC 3, UICC 4, and UICC 5, committed and willfully caused to be committed various overt acts in the Central District of California and elsewhere, including, but not limited to, the following:

Overt Act No. 1: On July 30, 2019, defendants DELAFRAZ and DANESHGAR caused the export of a shipment of Apple products with a declared value of $114,961 to the United Arab Emirates. That shipment included merchandise procured through wire fraud.

Overt Act No. 2: On August 20, 2019, defendants DELAFRAZ and DANESHGAR caused the export of a shipment of Apple products with a declared value of $187,631 to the United Arab Emirates. That shipment included merchandise procured through wire fraud.

Overt Act No. 3: On September 8, 2019, defendant DELAFRAZ and UICC 1 discussed UICC 1 supplying fraudulently funded gift card numbers to Wireless World.

Overt Act No. 4: On September 10, 2019, defendants DELAFRAZ and DANESHGAR caused the export of a shipment of Apple products with a declared value of $119,831 to the United Arab Emirates. That shipment included merchandise procured through wire fraud.

Overt Act No. 5: On September 23, 2019, defendant DANESHGAR and UICC 1 discussed law enforcement activity in connection with UICC Bai and fraudulently funded gift cards.

Overt Act No. 6: On October 17, 2019, UICC 1 provided defendant DELAFRAZ with fraudulently funded gift card numbers.

Overt Act No. 7: On October 22, 2019, defendant DELAFRAZ and UICC Bai discussed UICC Bai's supply of consumer electronics and fraudulently funded gift cards to Wireless World.

Overt Act No. 8: On December 12, 2019, defendant DELAFRAZ and UICC Bai discussed UICC Bai supplying fraudulently funded gift cards to Wireless World at a percentage of the face value of those cards.

Overt Act No. 9: During calendar year 2019, defendants DANESHGAR and DELAFRAZ caused the export of approximately $15,374,267 in consumer electronics from the United States. Those exports included merchandise procured through wire fraud.

Overt Act No. 10: On February 12, 2020, UICC 1 provided defendant DELAFRAZ with fraudulently funded gift card numbers.

Overt Act No. 11: On June 30, 2020, defendant DELAFRAZ caused a payment of $101,541 to be sent from Cathay Account #1 to a bank account in China in payment for consumer electronics received from UICC Bai.

Overt Act No. 12: On July 16, 2020, defendant DELAFRAZ and UICC 3 discussed UICC 3 supplying Wireless World with fraudulently funded gift cards at a percentage of the face value.

Overt Act No. 13: On September 8, 2020, defendant DELAFRAZ caused a payment of $134,156 to be sent from Cathay Account #1 to a bank account controlled by UICC 3 in payment for merchandise.

Overt Act No. 14: On September 17, 2020, defendant DELAFRAZ caused a payment of $218,382 to be sent from Cathay Account #1 to a bank account in China in part as payment for consumer electronics received from UICC Bai and in part to convert U.S. dollars to Chinese Renminbi.

Overt Act No. 15: On September 23, 2020, defendant DELAFRAZ caused a payment of $150,025 to be sent from Cathay Account #1 to a third-party account for the benefit of UICC Bai.

Overt Act No. 16: On November 3, 2020, defendant DELAFRAZ caused a payment of $59,026 to be sent from Cathay Account #1 to a third-party account for the benefit of UICC Bai.

Overt Act No. 17: On November 9, 2020, UICC Bai provided consumer electronic products to Wireless World.

Overt Act No. 18: On November 12, 2020, UICC Bai provided consumer electronic products to Wireless World.

Overt Act No. 19: On May 26, 2021, defendant DELAFRAZ used fraudulently funded Home Depot gift cards to purchase consumer electronics for shipment to Wireless World.

Overt Act No. 20: During calendar year 2020, defendants DANESHGAR and DELAFRAZ caused the export of approximately $17,816,387 in consumer electronics from the United States. Those exports included merchandise procured through wire fraud.

Overt Act No. 21: On June 29, 2021, defendant DELAFRAZ caused $36,750 of funds originating in Cathay Account #1 to be sent through another account into an escrow account for the purchase of real property.

Overt Act No. 22: On August 12, 2021, defendant DELAFRAZ caused $ 242,067.89 of funds originating in Cathay Account #1 to be sent through another account into an escrow account for the purchase of real property.

Overt Act No. 23: On August 31, 2021, UICC 2 delivered consumer electronics purchase with fraudulently funded gift cards to Wireless World.

Overt Act No. 24: On December 10, 2021, defendants DELAFRAZ and DANESHGAR caused a payment of $120,000 for merchandise to be sent from Cathay Account #1 to a third-party account for the benefit of UICC Thola.

Overt Act No. 25: On March 21, 2022, defendant DELAFRAZ used fraudulently funded Best Buy gift cards to purchase consumer electronics for shipment to Wireless World.

Overt Act No. 26: On May 10, 2022, defendant DELAFRAZ used fraudulently funded Best Buy gift cards to purchase consumer electronics for shipment to Wireless World.

Overt Act No. 27: On October 18, 2022, defendants DELAFRAZ and DANESHGAR caused a payment of $30,000 to be sent from Cathay Account #1 to a third-party account for the benefit of UICC Thola.

Overt Act No. 28: On January 19, 2023, defendants DELAFRAZ and DANESHGAR caused a payment of $20,000 to be sent from Cathay Account #1 to a third-party account for the benefit of UICC Thola.

Overt Act No. 29: On January 20, 2023, defendants DELAFRAZ and DANESHGAR caused a payment of $11,000 to be sent from Cathay Account #1 to a third-party account for the benefit of UICC Thola.

Overt Act No. 30: On January 23, 2023, defendants DELAFRAZ and DANESHGAR caused a payment of $20,000 to be sent from Cathay Account #1 to a third-party account for the benefit of UICC Thola.

Overt Act No. 31: On January 25, 2023, defendants DELAFRAZ and DANESHGAR caused a payment of $20,000 to be sent from Cathay Account #1 to a third-party account for the benefit of UICC Thola.

Overt Act No. 32: On August 4, 2023, defendants DELAFRAZ and DANESHGAR caused a payment of $50,000 to be sent from Cathay Account #1 to a third-party account for the benefit of UICC Thola.

Overt Act No. 33: On August 7, 2023, defendants DELAFRAZ and DANESHGAR caused a payment of $50,000 to be sent from Cathay Account #1 to a third-party account for the benefit of UICC Thola.

Overt Act No. 34: On October 10, 2023, defendants DELAFRAZ and DANESHGAR caused a payment of $40,000 to be sent from Cathay Account #1 to a third-party account for the benefit of UICC Thola.

Overt Act No. 35: On January 26, 2024, defendants DELAFRAZ and DANESHGAR caused a payment of $25,000 to be sent from Cathay Account #1 to a third-party account for the benefit of UICC Thola.

Overt Act No. 36: On February 20, 2024, defendants DELAFRAZ and DANESHGAR caused a payment of $30,000 to be sent from Cathay Account #1 to a third-party account for the benefit of UICC Thola.

Overt Act No. 37: On March 29, 2024, defendants DELAFRAZ and DANESHGAR caused a payment of $9,000 to be sent from Cathay Account #1 to a third-party account for the benefit of UICC Thola.

FORFEITURE ALLEGATION

[18 U.S.C. § 982]

1. Pursuant to Rule 32.2(a) of the Federal Rules of Criminal Procedure, notice is hereby given that the United States of America will seek forfeiture as part of any sentence, pursuant to Title 18, United States Code, Section 982(a)(2), in the event of any defendant's conviction of the offense set forth in this Indictment.

2. Any defendant so convicted shall forfeit to the United States of America the following:

a. All right, title and interest in any and all property, real or personal, constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of the offense, including but not limited to:

- Real property commonly known as 21627 Mulholland Dr, Woodland Hills, CA 91364.

b. To the extent such property is not available for forfeiture, a sum of money equal to the total value of the property described in subparagraph (a).

3. Pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b), any defendant so convicted shall forfeit substitute property, up to the total value of the property described in the preceding paragraph if, as the result of any act or omission of said defendant, the property described in the preceding paragraph, or any portion thereof: (a) cannot be located upon the exercise of due diligence; (b) has been transferred, 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 that cannot be divided without difficulty.

A TRUE BILL

/s/
Foreperson

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