

JRS:AMR/SP/KM  
F. #2022R00722

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK  
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UNITED STATES OF AMERICA

- against -

FATJON SHYTANI,  
also known as "Fati,"





Defendants.

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THE GRAND JURY CHARGES:

ALIEN SMUGGLING AND TRANSPORTATION CONSPIRACY

1. In or about and between March 2024 and April 2024, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants FATJON SHYTANI, also known as "Fati,"   
 together with others, did knowingly and intentionally conspire: (a) knowing that one or more persons were aliens, to bring to the United States such person or persons at a place other than a designated port of entry, contrary to Title 8, United States Code, Section 1324(a)(1)(A)(i); and (b) knowing and in reckless disregard of the fact that one or more aliens had come to and entered the United States in violation of law, to transport and move such alien or aliens within the United States by means of transportation and otherwise, in

I N D I C T M E N T

Cr. No. 25-CR-133  
(T. 8, U.S.C., §§ 1324(a)(1)(A)(v)(I),  
1324(a)(1)(B)(i) and 1324(b); T. 18,  
U.S.C., §§ 982(a)(6) and 3551 et seq.;  
T. 21, U.S.C., § 853(p); T. 28, U.S.C.,  
§ 2461(c))

Judge Sanket J. Bulsara  
Magistrate Judge James M. Wicks

furtherance of such violation of law, contrary to Title 8, United States Code, Section 1324(a)(1)(A)(ii), for the purpose of private financial gain.

(Title 8, United States Code, Sections 1324(a)(1)(A)(v)(I) and 1324(a)(1)(B)(i); Title 18, United States Code, Sections 3551 et seq.)

### CRIMINAL FORFEITURE ALLEGATION

2. The United States hereby gives notice to each defendant that, upon his conviction of the offense charged herein, the government will seek forfeiture in accordance with Title 18, United States Code, Section 982(a)(6), Title 8, United States Code, Section 1324(b) and Title 28, United States Code, Section 2461(c), which require the forfeiture of: (a) any conveyance, including any vessel, vehicle or aircraft used in the commission of such offense; (b) any property, real or personal, that is used to facilitate, or is intended to be used to facilitate, the commission of such offense; and (c) the gross proceeds of such offense.

3. If any of the above-described property, 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 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;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1), to seek forfeiture of any other

property of the defendants up to the value of the forfeitable property described in this forfeiture allegation.

(Title 8, United States Code, Section 1324(b); Title 18, United States Code, Section 982(a)(6); Title 21, United States Code, Section 853(p); Title 28, United States Code, Section 2461(c))

*John J. Durham*

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JOHN J. DURHAM  
UNITED STATES ATTORNEY  
EASTERN DISTRICT OF NEW YORK

A TRUE BILL

  
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FOREPERSON