

ML:TAW/DJL  
F. #2017R00702

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

----- X

UNITED STATES OF AMERICA

- against -

BAHADER THIARA,  
PERMINDER THIARA, and  
SHAILA KHONDKAR,

Defendants.

**To Be Filed Under Seal**

AFFIDAVIT AND  
COMPLAINT IN SUPPORT  
OF APPLICATION FOR  
ARREST WARRANT

(18 U.S.C. §§ 1029, 1956(h), 1957(a),  
1957(b), 2 and 3551 et seq.)

19-M-566

----- X

EASTERN DISTRICT OF NEW YORK, SS:

WILLIAM DUFFIN, being duly sworn, deposes and states that he is a Special Agent with the United States Department of Homeland Security, Homeland Security Investigations, duly appointed according to law and acting as such.

**COUNT ONE**  
(Access Device Fraud)

In or about and between January 2013 and December 2017, within the Eastern District of New York and elsewhere, the defendant BAHADER THIARA knowingly and with intent to defraud did traffic in and use one or more unauthorized access devices, in a manner affecting interstate commerce, and by such conduct did obtain something of value during any one year period, the aggregated value of which is equal to or greater than \$1,000.

(Title 18, United States Code, Section 1029(b)(2))

COUNT TWO  
(Money Laundering Conspiracy)

In or about and between January 2013 and December 2017, within the Eastern District of New York and elsewhere, the defendants BAHADER THIARA, PERMINDER THIARA, and SHAILA KHONDKAR, together with others, did knowingly and intentionally conspire to conduct and attempt to conduct financial transactions affecting interstate commerce which in fact involved the proceeds of specified unlawful activity, to wit, access device fraud, in Title 18, United States Code, Section 1029, knowing that the property involved in such financial transactions represented proceeds of some form of unlawful activity, and knowing that the transactions were designed in whole and in part to conceal and disguise the nature, location, source, ownership and control of such proceeds, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

(Title 18, United States Code, Sections 1956(h) and 3551 et seq.)

The source of your deponent's information and the grounds for his belief are as follows:<sup>1</sup>

1. I am a Special Agent with the United States Department of Homeland Security, Homeland Security Investigations ("HSI"). I am currently assigned to the El Dorado Task Force ("Task Force"), a multi-agency federal and state task force investigating financial crimes. My duties include conducting and assisting in investigations into various financial frauds including money laundering and identity theft. I have participated in numerous investigations involving financial frauds, during the course of which I have

---

<sup>1</sup> Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

interviewed suspects and witnesses, executed court-authorized search and arrest warrants and used other investigative techniques to secure relevant information, including the examination of computers and other electronic devices. As a result of my training and experience, I am familiar with the techniques and methods of operation used by individuals involved in criminal activity to carry out their activities. I am familiar with the facts and circumstances set forth below from my participation in the investigation, discussions with other law enforcement officials, my review of documents and my training and experience. Statements attributable to individuals herein are set forth in sum and substance. Where the contents of documents and the actions, statements and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated.

2. During the course of my work as an agent, I have been involved investigations of what are commonly referred to as credit card bust-out schemes and synthetic identity fraud schemes.

3. In a credit card bust-out scheme, individuals possessing counterfeit or unauthorized credit cards typically take their credit cards to collusive merchants who make fraudulent charges on these cards. These fraudulent charges include, but are not limited to, charges that purport to be for merchandise or services, but for which no actual merchandise or services are exchanged, and charges for which the collusive merchants and credit card holders know the card issuer will never be paid. Frequently, the collusive merchant is paid a fee by the credit card holder, often a percentage of the value of the fraudulent charges, for the fraudulent use of the credit cards. The credit card holder who allows these fraudulent charges has no intention of paying the credit card issuer for these charges. Frequently, the credit card holder makes fraudulent payments to the credit card issuer using fraudulent

checks or checks drawn on accounts with insufficient funds. Upon receipt of these fraudulent payments, but before determining whether the payments will clear, credit card issuers frequently apply these payments to the available balance of the credit card, essentially inflating the available credit limit on the charge card by the amount of the fraudulent payment. The credit card holder and collusive merchant will then make additional fraudulent charges on the charge card until either the additional credit generated from the fraudulent payments is consumed or the credit card issuer learns that there are insufficient funds to cover the fraudulent payment. When the credit card debt goes unpaid, credit card companies first categorize it as 30, 60 or 120 days delinquent. After the debt has been overdue for 120 days, the issuer moves it into the “collections” category. If the collection effort is unsuccessful, the issuer moves the debt into the “write-off” category and typically incurs a loss.

4. In a synthetic identity fraud scheme, the perpetrators of the scheme will typically open bank and credit card accounts in the names of one or more other individuals. The putative account holders are not real people. Rather, the perpetrators combine various pieces of personal identifier information (e.g., names, dates of birth, addresses and Social Security numbers) from different individuals, either real or fictitious, to create a fictitious synthetic identity that appears, for all intents and purposes, to represent a real person but, in reality, does not. The perpetrators typically open various types of accounts at different financial institutions for a given synthetic identity using the same synthetically-combined personal identifier information. Possession and use of a stable of synthetic identities frequently permits fraud perpetrators to commit a substantial number of line of credit or credit card bust-out frauds.

5. In addition to direct fraudulent transactions with financial institutions, perpetrators of line of credit fraud, credit card bust-out schemes and synthetic identity fraud frequently create and/or control shell companies (which have little or no legitimate business purpose) from which seemingly legitimate purchases of goods or services are made or to which charges from fraudulent credit or debit cards are sent. Shell companies are also frequently used to write checks to artificially inflate the credit limit for a credit card account, make fraudulent deposits into checking accounts, or make fraudulent repayments on line of credit accounts. Investigating agents frequently discover that a company is a shell company with no legitimate business purpose through a number of methods. For example, investigating agents may determine that the address purportedly used to conduct business is either fictitious or that there is no apparent business activity being transacted there that matches the ostensible business purpose of the firm. A review of bank accounts and other financial statements for the company may reveal that there are no apparent legitimate business income or business expenses, such as payroll, expenses or cost of goods. Additionally, investigating agents may identify fraudulent bank and credit card accounts used for line of credit fraud or credit card bust-outs and discover from financial records that a company with no apparent legitimate business purpose is receiving a high volume of transactions-including debit card and credit card transactions-from these fraudulent accounts, indicating that one of the primary purposes of the company is to facilitate the use of such fraudulent accounts.

## SUMMARY

6. As set forth below, the defendants' conspiracy involved laundering the proceeds of line of credit fraud, credit card bust-out schemes, and synthetic identity fraud. In particular, the defendant BAHADER THIARA ("BAHADER") is believed to have controlled more than 20 synthetic identities that held credit cards at various financial institutions. Investigating agents determined that an identity was synthetic by reviewing law enforcement databases and publicly available databases. This review allows investigating agents to confirm whether the personal identifier information associated with the synthetic identity corresponds to a real person. For example, synthetic identities often use Social Security numbers that belong to another individual with a different name. Similarly, a check of law enforcement databases may indicate that there are no immigration, passport, or travel records related to the identity, which indicates that the identity may be synthetic.

7. The defendant BAHADER THIARA's control of these synthetic identities is demonstrated by, inter alia, surveillance cameras capturing him executing bank transactions on accounts in the names of the various synthetic identities. BAHADER used these synthetic identities to, among other things, make fraudulent purchases using credit cards in the names of the various synthetic identities.

8. The defendant BAHADER THIARA is also believed to have controlled numerous shell companies with little or no business purpose, but which are believed to have used or possessed equipment that enabled these companies to accept purchases from fraudulent credit cards controlled by BAHADER. BAHADER's control of these shell companies is demonstrated by, inter alia, surveillance cameras that captured him executing bank transactions on accounts in the names of the shell companies. BAHADER's shell

companies included Construction and More USA Inc., Kumar Construction Corp., 123 Construction Inc., Roofing Contracting NYC Inc., BB1 Electronics Inc., and Singh Sarai (collectively, the “Shell Companies”).

9. As described in further detail below, using evidence of surveillance cameras, addresses, business records, bank accounts and fraudulent purchases made through shell companies, the defendant BAHADER THIARA was identified as a participant in synthetic identity fraud, credit card fraud and line of credit fraud.

10. From approximately 2014 to 2016, the Shell Companies collectively accepted more than \$2.6 million in fraudulent credit card purchases from credit cards in the names of synthetic identities. More than \$890,000 of those fraudulent charges have been attributed to credit cards in the names of synthetic identities controlled by the defendant BAHADER THIARA. Due to the lack of an identifiable business purpose for the Shell Companies, I believe that essentially all of the charges made to the Shell Companies are fraudulent purchases.

11. From approximately 2014 to 2016, more than \$1.9 million in cash was withdrawn from bank accounts in the name of the Shell Companies.

12. From approximately 2013 to 2017, bank accounts belonging to the defendants BAHADER THIARA, PERMINDER THIARA (“PERMINDER”), and SHAILA KHONDKAR collectively had more than \$1.5 million in cash deposits. The defendants did not have another legitimate source of income sufficient to explain the substantial cash deposits.

## ACCESS DEVICE FRAUD

13. The defendant BAHADER THIARA used numerous synthetic identities as an integral part of the broader money laundering conspiracy. The following example illustrates the operation of the fraudulent scheme using three of the synthetic identities, “Akhtar Abbas,” “Ajit Khanna,” and “Sukhpal Singh.”<sup>2</sup> BAHADER, however, used more than 20 synthetic identities to participate in the fraudulent schemes.

### A. Synthetic Identities

#### a. Akhtar Abbas

14. “Akhtar Abbas” is a fictitious synthetic identity used to carry out the fraudulent scheme. Although “Akhtar Abbas” possesses a date of birth, Social Security number and other personal identifiers typically required to open a credit card and/or bank account, he or she is not a real person. For example, “Akhtar Abbas” applied for a credit card account at HSBC Bank and submitted a New York driver’s license number. A check of the database of the New York State Department of Motor Vehicles (“NY DMV”) confirmed that this number is not associated with a driver’s license. Further, a check of law enforcement databases indicate that there are no immigration, passport or travel records related to “Akhtar Abbas.” The defendant BAHADER THIARA then used this and other fictitious synthetic identities to submit applications for, among other things, credit cards and/or bank accounts.

15. On June 16, 2014, “Akhtar Abbas” opened a checking account and saving account at Bank of America. The listed address for “Akhtar Abbas” on these

---

<sup>2</sup> These examples of synthetic identities are merely illustrative and do not fully describe all information uncovered by the investigation thus far.



accounts was an address on Cuttermill Road in Great Neck, New York (“Cuttermill Address”). The proceeds from fraudulent charges made by synthetic identities to Singh Sarai, a shell company controlled by the defendant BAHADER THIARA, were deposited into this Bank of America checking account.

16. On October 13, 2014, “Akhtar Abbas” opened a line of credit (“LOC”) account at Chase Bank and made approximately \$10,472 in charges to several shell companies, including Construction and More USA, Inc., a shell company controlled by the defendant BAHADER THIARA. Approximately \$9,435 in payments made to the LOC to repay the charges were subsequently reversed due to insufficient funds in the originating account. The \$10,472 in charges were paid to merchants. Chase Bank suffered losses on the fraudulent transactions that were subsequently reversed.

17. On August 17, 2015, “Akhtar Abbas” also opened a checking account at HSBC Bank. The listed address for “Akhtar Abbas” was the Cuttermill Address. In September 2015, surveillance cameras from HSBC Automated Teller Machines (“ATMs”) captured the defendant BAHADER THIARA conducting two cash withdrawals from the HSBC checking account in the name of “Akhtar Abbas” and depositing a check from Construction and More USA Inc., a shell company controlled by BAHADER, into the same “Akhtar Abbas” HSBC checking account.

b. Ajit Khanna

18. “Ajit Khanna” is another synthetic identity used to carry out the fraudulent scheme. Like “Akhtar Abbas,” “Ajit Khanna” possesses personal identifying information, but this information does not correspond to a real person. For example, “Ajit Khanna” applied for a credit card account at HSBC Bank and submitted a New York driver’s

license number. A check of the database of the NY DMV confirmed that this number is not associated with a driver's license. Further, a check of law enforcement databases indicate that there are no immigration, passport or travel records related to "Ajit Khanna."

19. On January 26, 2012, "Ajit Khanna" opened a checking account at HSBC Bank. Surveillance cameras from HSBC Bank's ATMs captured the defendant BAHADER THIARA making cash withdrawals from the account on or about, among other dates, March 24, 2016 and March 25, 2016.

20. On April 13, 2016, "Ajit Khanna" opened a credit card account at U.S. Bank and made approximately \$8,972 in charges to several shell companies, including Construction and More USA, Inc. Approximately \$19,372 in payments made to the credit card account to repay the charges were subsequently reversed due to insufficient funds in the originating account. The \$8,972 in charges were paid to merchants. U.S. Bank suffered losses on the fraudulent transactions that were subsequently reversed.

c. Sukhpal Singh

21. "Sukhpal Singh" is another synthetic identity. Like "Akhtar Abbas" and "Ajit Khanna," "Sukhpal Singh" possesses personal identifying information, but this information does not correspond to a real person. For example, a check of law enforcement databases indicate that there are no immigration, passport or travel records related to "Sukhpal Singh."

22. Prior to April 30, 2016, "Sukhpal Singh" opened a credit card account at HSBC Bank and made approximately \$18,516 in charges to several shell companies, including Construction and More USA, Inc. Approximately \$15,076 in payments made to the credit card account to repay the charges were subsequently reversed due to insufficient

funds in the originating account. The \$18,516 in charges were paid to merchants. HSBC Bank suffered losses on the fraudulent transactions that were subsequently reversed.

23. On April 20, 2016, “Sukhpal Singh” opened a checking account at HSBC Bank. Surveillance photos from HSBC Bank ATMs captured the defendant BAHADER THIARA conducting transactions on the account on or about, among other dates, May 25, 2016 and June 2, 2016.

24. Further investigation revealed additional fraudulent accounts opened using various synthetic identities and identified the defendant BAHADER THIARA as the individual controlling the synthetic identities. For example, more than 20 accounts were opened at Barclays Bank. Members of the Task Force contacted Barclays Bank in 2017 to obtain transaction records. The transaction records revealed that BAHADER controlled the fraudulent accounts. The investigation has revealed more than 15 synthetic identities controlled by BAHADER and more than \$150,000 in fraudulent charges connected to those accounts at Barclays Bank.

#### B. Shell Companies

25. Construction and More USA Inc. is a shell company controlled by the defendant BAHADER THIARA. On May 15, 2015, a bank account was opened at Capital One Bank with an account number ending with 5731 in the name of Construction and More USA Inc. (“CO 5731”).<sup>3</sup> The listed president of Construction and More USA Inc. and sole signatory on the account is “Harry Deol.” “Harry Deol” is another synthetic identity. “Harry Deol” possesses personal identifying information, but this information does not

---

<sup>3</sup> I have not included the full account numbers of bank accounts referenced in this Complaint.

correspond to a real person. The address listed on the Construction and More USA Inc. account is 117-79 141 Street, Jamaica, New York (“117-79 Address”). Surveillance cameras from Capital One Bank ATMs captured BAHADER conducting transactions on the CO 5731 account on or about, among other dates, August 19, 2016, September 16, 2016 and September 19, 2016.

26. BB1 Electronics Inc. is a shell company controlled by the defendant BAHADER THIARA. On May 11, 2015, a bank account was opened at Capital One Bank with an account number ending with 3420 in the name of BB1 Electronics Inc. (“CO 3420”). Surveillance cameras from Capital One Bank ATMs captured BAHADER conducting transactions on the CO 3420 account on or about February 13, 2016, February 29, 2016 and March 30, 2016, among other dates.

27. Roofing Contracting NYC Inc. is a shell company controlled by the defendant BAHADER THIARA. On October 13, 2015, a bank account was opened at Capital One Bank with an account number ending with 3327 in the name of Roofing Contracting NYC Inc. (“CO 3327”). The listed president of Roofing Contracting NYC Inc. and sole signatory on the account is “Harry Deol.” This “Harry Deol” provided the same identifying information, including social security number and date of birth, as the “Harry Deol” that opened Capital One Bank account CO 5731 in the name of Construction and More USA Inc. Surveillance cameras from Capital One Bank ATMs captured BAHADER conducting a transaction on the CO 3327 account on or about February 27, 2016 and May 20, 2016.

28. Kumar Construction Corp. is a shell company controlled by the defendant BAHADER THIARA. On June 19, 2015, a bank account was opened as Capital

One Bank with an account number ending with 7490 in the name of Kumar Construction Corp. The listed president of Kumar Construction Corp. and sole signatory on the account is “Harry Deol.” This “Harry Deol” provided the same identifying information, including social security number and date of birth, as the “Harry Deol” who opened Capital One Bank with account number CO 5731 in the name of Construction and More USA Inc. and the “Harry Deol” who opened Capital One Bank with account number CO 1278 in the name of Roofing Contracting NYC Inc. The address listed on the Kumar Construction Corp. account is the 117-79 Address.<sup>4</sup>

29. Singh Sarai is a shell company controlled by the defendant BAHADER THIARA. On June 16, 2014, a bank account was opened at Bank of America with an account number ending with 9863 in the name of Akhtar Abbas (“BOA 9863”). As previously discussed, Akhtar Abbas is a synthetic identity controlled by BAHADER.

30. From May 2015 through September 2016, the Shell Companies accepted more than \$2.6 million in deposits as a result of fraudulent purchases. The fraudulent purchases did not involve an exchange of goods or services. As part of the scheme, the Shell Companies received payment for the transactions from banks and credit card processors, and, in turn, those banks and credit card processors suffered financial losses in the full amount of the fraudulent charges.

---

<sup>4</sup> The investigation has revealed additional shell companies not identified in this Complaint but that I believe are controlled by the defendant BAHADER THIARA.

The approximate charges are as follows:

<b>Shell Company</b>	<b>Approximate Amount Charged from Synthetic Identities</b>	<b>Date Range</b>	<b>Bank Account</b>
Construction and More USA Inc.	\$731,962	05/2015-09/2016	CO 5731
BB1 Electronics Inc.	\$1,013,679	05/2015-09/2016	CO 3420 <sup>5</sup>
Roofing Contracting NYC Inc.	\$508,800	11/2015-09/2016	CO 3327
Kumar Construction Corp. <sup>6</sup>	\$185,000		
Singh Sarai	\$227,913	07/2014-05/2015	BOA 9863 <sup>7</sup>

**MONEY LAUNDERING CONSPIRACY**

31. As discussed in further detail below, the investigation has revealed that the defendants are involved in a scheme to launder the proceeds of the above-mentioned access device scheme by withdrawing the proceeds in cash from accounts in the name of Shell Companies and depositing them into bank accounts belonging to the defendants. The investigation has also revealed evidence that the defendants used the funds gained from this fraudulent scheme to, among other things, purchase investment properties.

---

<sup>5</sup> From September 2015 to June 2016, Construction and More USA Inc. accepted credit card charges in the amount of \$11,500 that were deposited in CO 3420.

<sup>6</sup> Members of the Task Force has not yet identified bank accounts belonging to Kumar Construction Corp.

<sup>7</sup> In March 2015 to May 2015, BB1 Electronics Inc. accepted credit card charges in the amount of \$17,286 that were deposited in BOA 9863.

32. In or about and between May 2014 through September 2016, approximately \$1.9 million was withdrawn in cash from accounts held in the name of the Shell Companies. The approximate withdrawals are as follows:

Shell Company	Cash Withdrawn	Date	Bank Account
Construction and More USA Inc.	\$501,712	05/2015 – 09/2016	CO 5731
BB1 Electronics Inc.	\$906,800	06/2015 – 09/2016	CO 3420
Roofing Contracting NYC Inc.	\$383,000	10/2015 – 09/2016	CO 3327
Singh Sarai	\$150,820	06/2014 – 04/2015	BOA 9863

33. From January 2013 through October 2017, more than \$1.5 million was deposited in cash into a variety of accounts controlled by the defendants BAHADER THIARA, PERMINDER THIARA, and SHAILA KHONDKAR. The defendants do not appear to have legitimate sources of income sufficient to explain the substantial cash deposits.

A. BAHADER THIARA and PERMINDER THIARA

34. The defendants BAHADER THIARA and PERMINDER THIARA are a married couple and appear to reside at a home on 87th Avenue in Queens Village, New York (the “Thiara Home”).

35. On September 12, 2014, the defendant BAHADER THIARA opened a checking account at Chase bank with an account number ending with 8098 (“Chase 8098”). BAHADER is the sole signatory on the account. From October 2014 through May 2017, more than \$117,343 in cash deposits were made to this account. As detailed below, in October 2015, there was a \$135,000 payment from BAHADER’s Chase 8098 towards the

loan of an investment property owned by BM Solutions Inc., an entity controlled by the defendant SHAILA KHONDKAR.

36. On November 1, 2011, the defendant PERMINDER THIARA opened a checking account at HSBC bank with an account number ending with 4891 (“HSBC 4891”). PERMINDER is the sole signatory on the account. From April 2013 through March 2016, more than \$175,000 in cash deposits were made to this account. As detailed below, this account was used to fund real estate transactions.

37. Prior to January 2013, the defendants BAHADER THIARA and PERMINDER THIARA opened a joint account at Citibank with an account number ending with 8501 (“Citi 8501”). BAHADER and PERMINDER are the sole signatories on the account. From January 2013 through February 2017, more than \$84,000 in cash deposits were made into this account. As detailed below, this account was used to pay the mortgage of an investment property owned by PERMINDER. BAHADER and PERMINDER’s Citi 8501 account was also used to make \$33,477 payment towards the outstanding loan for PERMINDER’s 2010 Mercedes Benz.

38. Prior to January 2013, the defendants BAHADER THIARA and PERMINDER THIARA opened a joint account at Citibank with an account number ending with 1710 (“Citi 1710”). BAHADER and PERMINDER are the sole signatories on the account. From January 2013 through April 2017, more than \$133,000 in cash deposits were made into this account. As detailed below, this account was also funded by a check deposited October 6, 2016 from MB Solutions Inc. for \$50,000, which was sourced from the sale of a property located at 88-32 75th Street, Woodhaven, New York. MB Solutions Inc. is an entity controlled by the defendant SHAILA KHONDKAR. In total, the investigation



revealed at least four different bank accounts for which PERMINDER is either the sole signatory or the co-signatory with BAHADER. During the period of January 2013 and December 2017, approximately \$1 million in cash was deposited into these accounts.

39. On February 8, 2018, Judge Margo K. Brodie of the United States District Court for the Eastern District of New York signed an ex parte application for tax return information covering the years 2013 to 2017 pertaining to the defendants BAHADER THIARA, PERMINDER THIARA, SHAILA KHONDKAR, one other individual (“Individual-1”), and others entities connected with this fraudulent scheme (18-MISC-393).

40. From tax years 2013 through 2017, the defendants BAHADER THIARA and PERMINDER THIARA jointly filed their personal income taxes on Forms 1040. Throughout that time, BAHADER and PERMINDER reported an average annual income of approximately \$135,000. BAHADER reported income from Surjit Liquors Inc. and PERMINDER reported income from Time Warner Cable Inc. The investigation has not revealed any other legitimate sources of significant income.

#### B. SHAILA KHONDKAR

41. The defendant SHAILA KHONDKAR is a real estate investor, according to financial records. KHONDKAR and her mother reside at an address on 84th Road in Jamaica, New York (“Khondkar Address”). KHONDKAR owns several corporations engaged in the business of purchasing real estate. These properties include EM Solutions USA Inc., BM Solutions USA Inc., ZS Management USA Inc., and MB Solutions USA Inc. (collectively, “Khondkar Entities”). Investigating agents reviewed records related to each of the Khondkar Entities and determined that these companies are all registered to the

Khondkar Address. The investigation has revealed at least seven bank accounts belonging to the Khondkar Entities. KHONDKAR is an authorized user on all of the bank accounts, and her mother is an authorized user on some of the bank accounts. There are no other authorized users on any of the identified corporate accounts.

42. From tax years 2013 through 2017, the defendant SHAILA KHONDKAR individually filed her personal income taxes on Form 1040. Throughout that time, KHONDKAR reported an average annual adjusted gross income of approximately \$11,518. The investigation has not revealed any other legitimate sources of significant income.

43. Investigating agents have identified payments made by synthetic identities controlled by the defendant BAHADER THIARA for the property taxes of investment properties owned by the Khondkar Entities. The payments are as follows:

<b>Date</b>	<b>Amount</b>	<b>Khondkar Entities</b>	<b>Property Owned</b>	<b>Synthetic Identity</b>
11/27/2015	\$2,443.96	ZS Management Inc.	9018 210th Street, Queens Village, NY	Ali Hafeez
11/27/2015	\$2,728.16	MB Solutions USA Inc.	88-32 75th Street, Woodhaven, NY	Ali Hafeez
02/01/2016	\$6,024.84	BM Solutions USA Inc.	31 Cedar Road, Westbury, NY	Tanveer Siddiq
02/05/2016	\$1,755.89	BM Solutions USA Inc.	31 Cedar Road, Westbury, NY	Ali Hafeez
01/05/2017	\$9,046.87	BM Solutions USA Inc.	31 Cedar Road, Westbury, NY	Bahadur Singh

44. Two of the above payments for property taxes were made on November 27, 2015 and totaled \$5,172.12. A check dated December 3, 2015 in the amount of \$4,000 was written from MB Solutions Inc.'s account at TD Bank to the defendant BAHADER

THIARA and the memo line stated “8832 Taxes/Con ed bill.” As discussed below, MB Solutions Inc. owned a property at 88-32 75th Street, Woodhaven, NY.

45. From January 2013 through December 2017, personal and corporate accounts controlled by the defendant SHAILA KHONDKAR have accepted substantial amounts of cash deposits. The bank account owner and approximate cash deposits are as follows:

<b>Khondkar Entities/Owner</b>	<b>Amount of Cash Deposits</b>	<b>Account</b>
Khondkar	\$41,000	TD Bank 7412
Khondkar	\$119,000	Bank of America 4281
BM Solutions USA Inc.	\$172,000	TD Bank 0368
MB Solutions USA Inc.	\$20,000	TD Bank 7090
ZS Management Inc.	\$163,000	TD Bank 9163
BZB Associates	\$20,000	Bank of America 9272
BM Management	\$118,000	Bank of America 8587

C. The Defendants’ Deposits

46. From 2013 through 2017, more than \$1,500,000 was deposited into banks accounts held in the names of the defendants BAHADER THIARA, PERMINDER THIARA, SHAILA KHONDKAR and the Khondkar Entities. The approximate deposits are as follows:

<b>Account Holder</b>	<b>Approximate Cash Deposits</b>	<b>Date Range</b>
BAHADER and/or PERMINDER	\$992,000	01/2013–10/2017
KHONDKAR and Khondkar Entities	\$653,000	01/2013–10/2017

D. Financing of 233-12 87th Avenue

47. The investigation has further uncovered evidence that the defendant PERMINDER THIARA has used proceeds from the access device fraud scheme to among, other things, finance the purchase of a single family home located at 233-12 87th Avenue, Queens Village, New York. This home is on the same street as the Thiara Home.

48. On August 7, 2013, the defendant PERMINDER THIARA purchased a home located at 233-12 87th Avenue for \$475,000. PERMINDER financed the home with a \$380,000 mortgage from Flagstar Bank.

49. On March 10, 2014, there was a \$15,000 payment to the mortgage of 233-12 87th Avenue from the defendants BAHADER THIARA and PERMINDER THIARA's joint Citi 8501 account. On March 17, 2015, there was another \$15,000 payment to the mortgage of 233-12 87th Avenue from the same joint Citi 8501 account.

50. During November 2013 through May 2016, rental tenants resided at 233-12 87th Avenue. The defendant PERMINDER THIARA was paid rent by these tenants and deposited some of this income into Citi 8501. These payments were made by check made payable to PERMINDER.

51. From June 2014 through June 2015, there were five payments of \$15,000 each made from the defendant PERMINDER THIARA's HSBC 4891 to the mortgage of 233-12 87th Avenue. From May 2014 through June 2015, \$66,520 in cash deposits were made to PERMINDER's HSBC 4891.

52. In February 2016, the mortgage for 233-12 87th Avenue was paid off with two official Citibank checks totaling \$253,862.79. The first check, dated January 19, 2016, was in the amount of \$200,000 and from a home equity line of credit account

connected to the Thiara Home and held by Individual-1. The second check, dated February 2, 2016, was in the amount of \$53,862.79 and was from Individual-1's checking account at Citibank with an account number ending with 483.<sup>8</sup>

53. After the five \$15,000 payments from HSBC 4891 to reduce the mortgage principle, from June 25, 2015 through March 29, 2016, there were an additional 14 cash deposits totaling \$99,772 into HSBC 4891.

E. Financing of Khondkar Properties

a. 88-32 75th Street, Woodhaven, New York

54. On December 11, 2014, MB Solutions USA Inc., an entity controlled by the defendant SHAILA KHONDKAR, bought a property at 88-32 75th Street, Woodhaven, New York for \$285,000. As noted above, on November 27, 2015, real estate taxes for this property were paid on one occasion by a fraudulent credit card controlled by the defendant BAHADER THIARA.

55. On September 19, 2016, this property was sold for \$641,000. On September 22, 2016, approximately \$592,041 of the proceeds were transferred to MB Solutions' TD Bank 7090. The defendant BAHADER THIARA and Individual-1 received approximately \$412,000 pursuant to the sale. On September 29, 2016, a check, dated September 27, 2016, for \$200,000 from MB Solutions' TD 7090 was deposited into a bank account jointly held by Individual-1 and another individual ("Individual-2"). This check was made payable to Individual-1's legal name. Both Individual-1 and Individual-2 are related to BAHADER. The memo line on the check reads "88-32 75<sup>th</sup> St" and the check

---

<sup>8</sup> From February 2013 through October 2016, more than \$90,500 in cash deposits were made to this account.

was signed by the defendant SHAILA KHONDKAR's mother. Also on September 29, 2016, a check, dated September 27, 2016, for \$162,000 from MB Solutions' TD 7090 was deposited into BAHADER's Chase 6916. The check was payable to "Bahader Thiara." The memo line on the check reads "88-32 75<sup>th</sup> St" and the check was signed by KHONDKAR's mother.

56. On October 6, 2016, a check, dated October 3, 2016, for \$50,000 from MB Solutions' TD 7090 and was deposited in BAHADER and PERMINDER's joint Citi 1710. The check was payable to "Bahader Thiara," the memo line on the check reads "88-32 75<sup>th</sup> St" and the check was signed by the defendant SHAILA KHONDKAR's mother.

b. 90-18 210th Street, Queens Village, New York

57. On March 11, 2015, ZS Management purchased a property at 90-18 210th Street, Queens Village, New York. As noted above, on November 27, 2015, real estate taxes for this property were paid on one occasion by a fraudulent credit card controlled by the defendant BAHADER THIARA.

58. Prior to the purchase of this property, on December 22, 2014, a cashier's check from the defendant BAHADER THIARA to ZS Management, dated December 22, 2014, for \$11,600 was deposited in ZS Management's account at TD Bank ending in 9163. On December 22, 2014, a wire transfer for \$17,578.50 was sent from TD 9163 to real estate attorneys as part of the purchase price. The purchase was finalized on March 11, 2015. On March 11, 2015, the defendant BAHADER THIARA sent an official bank check from a Citibank account in his name ending in 7009 to the same real estate attorneys for \$158,435.63.

CONCLUSION

WHEREFORE, your deponent respectfully requests that the defendants BAHADER THIARA, PERMINDER THIARA, and SHAILA KHONDKAR be dealt with according to law.

REQUEST FOR SEALING

It is respectfully requested that this Court issue an order sealing, until further order of the Court, all papers submitted in support of this application, including the application. I believe that sealing this document is necessary to preserve the integrity of this ongoing criminal investigation. Based upon my training and experience, I have learned that online criminals actively search for criminal affidavits and arrest warrants via the Internet, and disseminate them to other criminals as they deem appropriate. Premature disclosure of this affidavit and related documents may have a significant and negative impact on the continuing investigation and may severely jeopardize its effectiveness.

\_\_\_\_\_  
WILLIAM DUFFIN  
Special Agent, United States Department of  
Homeland Security, Homeland Security  
Investigations

Sworn to before me this  
\_\_ day of June, 2019

\_\_\_\_\_  
THE HONORABLE ROANNE L. MANN  
UNITED STATES MAGISTRATE JUDGE  
EASTERN DISTRICT OF NEW YORK