
United States District Court
District of New Jersey

UNITED STATES OF AMERICA

: **Hon. Steven C. Mannion**

v.

: **Magistrate Number: 16-6049 (SCM)**

SYED QASIM ABBAS,

: **Criminal Complaint**

a/k/a "Qasim Reza," and
a/k/a "Nayyer"

I, David A. Ferrante, the undersigned complainant being duly sworn, state the following is true and correct to the best of my knowledge and belief.

SEE ATTACHMENT A

I further state that I am a Special Agent with the United States Department of Homeland Security, Homeland Security Investigations ("HSI"), and that this complaint is based on the following facts:

SEE ATTACHMENT B

continued on the attached page and made a part hereof.



David A. Ferrante, Special Agent
U.S. Department of Homeland Security
Homeland Security Investigations

Sworn to before me and subscribed in my presence,

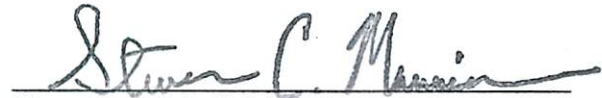
March 30, 2016

Date

at Newark, New Jersey

City and State

Honorable Steven C. Mannion
United States Magistrate Judge
Name & Title of Judicial Officer


Signature of Judicial Officer

ATTACHMENT A

Count One
(H1-B Visa Fraud)

From in or about early 2014 through in or about late 2015, in Union County, in the District of New Jersey, and elsewhere, defendant

SYED QASIM ABBAS,
a/k/a "Qasim Reza," and
a/k/a "Nayer"

knowingly falsely made non-immigrant visas, namely H1-B visas, and uttered, used, attempted to use, possessed, obtained, accepted, and received said non-immigrant visas and other documents prescribed by statute and regulation for entry into and as evidence of authorized stay and employment in the United States, knowing such visas and documents had been falsely made and procured by means of false claims and statements and otherwise procured by fraud and unlawfully obtained, as described in Attachment B.

In violation of Title 18, United States Code, Section 1546(a) and Section 2.

Count Two
(False Statements)

From in or about early 2014 through in or about late 2015, in Union County, in the District of New Jersey, and elsewhere, defendant

SYED QASIM ABBAS,
a/k/a "Qasim Reza," and
a/k/a "Nayyer"

in a matter within the jurisdiction of the executive branch of the United States, namely, the United States Department of Homeland Security, United States Citizenship and Immigration Services and the United States Department of Labor, knowingly and willfully (a) made materially false, fictitious, and fraudulent statements and representations, (b) made and used false writings and documents knowing them to contain materially false, fictitious, and fraudulent statements and entries, and (c) falsified, concealed, and covered up by trick, scheme, and device, certain material facts; namely, Petitions for Non-immigrant Workers, Forms I-129, and Labor Condition Applications submitted to United States Department of Homeland Security, United States Citizenship and Immigration Services and the United States Department of Labor that contained materially false and fraudulently representations and used materially false writings and documents knowing them to contain materially false, fictitious, and fraudulent statements and entries, as described in Attachment B.

In violation of Title 18, United States Code, Sections 1001 and 2.

Count Three
(Conspiracy to Harbor Aliens for Profit)

From in or about early 2014 through in or about late 2015, in Union County, in the District of New Jersey, and elsewhere, defendant

SYED QASIM ABBAS,
a/k/a "Qasim Reza," and
a/k/a "Nayyer"

knowingly and intentionally conspired and agreed with others, for the purpose of commercial advantage and private financial gain, to encourage and induce aliens to reside in the United States, knowing and in reckless disregard of the fact that such residence was and would be a violation of law, as described in Attachment B, contrary to Title 8, United States Code, Section 1324(a)(1)(A)(iv).

In violation of Title 8, United States Code, Section 1324(a)(1)(A)(v)(I).

ATTACHMENT B

I, David A. Ferrante, am a Special Agent with the United States Department of Homeland Security, Homeland Security Investigations ("HSI"). I have personally participated in this investigation and am aware of the facts and circumstances contained herein based on my own investigation, as well as my review of documents, records, information and evidence provided to me by other law enforcement officers and relevant personnel. Since this Affidavit is submitted for the sole purpose of establishing probable cause to support the issuance of a complaint and arrest warrant, I have not necessarily included each and every fact known by the government concerning this investigation. Where statements of others are related herein, they are related in substance and in part. Where I assert that an event took place on a particular date, I am asserting that it took place on or about the day alleged.

The Defendant and Other Parties

1. At all times relevant to this Criminal Complaint:

a. Defendant SYED QASIM ABBAS, a/k/a "Qasim Reza," and "Nayyer" ("ABBAS"), was resident of New York. ABBAS was the primary owner and operator of Fastnet Software International, Inc., an information technology staffing and consulting company located in East Northport, New York (hereinafter "Fastnet").

b. A federal agent was acting in an undercover capacity (hereinafter "UC-1") and posing as the owner and operator of the University of Northern New Jersey (hereinafter the "School"). The School was physically located in Cranford, New Jersey. The School was part of a federal law enforcement undercover operation designed to identify individuals and entities engaged in immigration fraud. The School was not staffed with instructors /educators, had no curriculum, and no actual classes or educational activities were conducted at the School.

Overview

2. Beginning in or about early 2013, federal agents from HSI, using the School, commenced an undercover operation to investigate fraud and the criminal exploitation of United States immigration laws. As a result of this undercover operation, federal agents obtained evidence demonstrating that beginning in or about October 2013, ABBAS engaged in immigrations schemes designed to fraudulently obtain status for non-immigrants, to harbor illegal aliens in the United States, and to maximize his profits. In particular, ABBAS engaged in the following fraudulent immigration schemes: (a) he fraudulently obtained and attempted to obtain H1-B Visas (hereinafter the "H1-B Visa

Program") for non-immigrants by falsely claiming that these aliens would be employed at the School (hereinafter the "Foreign Worker Visa Scheme"); and (b) he fraudulently obtained and attempted to obtain F-1 Non-Immigrant Student Visas (hereinafter the "Student Visa Program") for non-immigrants by falsely claiming that these aliens would be enrolled in and attending the School as students (hereinafter the "Student Visa Scheme").

3. In furtherance of the Foreign Worker Visa Scheme, ABBAS: (a) created false and fraudulent documents, such as contracts, falsely representing that the foreign workers would be employed at the School in various Information Technology (hereinafter "IT") positions; (b) paid UC-1 thousands of dollars for false documents from the School, falsely representing that foreign workers would be employed at the School; and (c) signed and submitted to the United States Government immigration petitions and other supporting documents on behalf of foreign workers, falsely representing that these foreign workers would be employed at the School. In fact none of those whom ABBAS represented to be working at the School in fact worked there. In total, ABBAS fraudulently petitioned the United States and attempted to obtain approximately twenty H1-B visas under the Foreign Worker Visa scheme.

4. In furtherance of the Student Visa Scheme, ABBAS (a) recruited non-immigrants possessing temporary visas (such as B1/B2 visitor visas) and converted their status (*i.e.*, effected a "Change of Status") to student visas in exchange for money; (b) purchased fraudulent documents, such as fake School acceptance letters and bank statements, from UC-1 and the School; and (c) submitted, and caused to be submitted, these false and fraudulent documents to the United States Government to obtain the Change of Status for these aliens, even though ABBAS knew, as described below, that none of these "students" actually attended the School as students.

Summary of Relevant Immigration Policies and Procedures

5. Based on my education, training, and experience, together with my discussions with other individuals, I am generally familiar with the H1-B Visa Program and the Student Visa Program. These programs are summarized as follows:

6. The H1-B Visa Program:

a. The United States requires individuals from most foreign countries to obtain a visa before entry into the United States. As they apply to this investigation, non-immigrant visas are required for foreign citizens who intend to enter the United States on a temporary basis, such as for tourism, medical treatment, business, temporary work, or study.

b. An H-1B visa permits an alien to work in the United States subject to certain requirements. The H1-B Visa Program allows businesses in the United States to employ foreign workers with specialized or technical expertise in a particular field such as accounting, engineering, or computer science.

c. Before hiring a foreign worker under the H1-B Visa Program, the employer must first obtain approval from the United States Department of Labor ("DOL") by filing a Labor Condition Application ("LCA"). In the LCA, the employer represents that it intends to employ a specified number of foreign workers for specific positions for a particular period of time. The employer is also required to make truthful representations regarding the foreign worker's rate of pay, work location, and whether the position is full-time. In addition, the employer agrees to pay the foreign worker for non-productive time—that is, an employer who sponsors a foreign worker is required to pay wages and other benefits to the foreign worker, even if he or she is not actively working for certain periods of time. The employer must further attest that the representations are true and accurate, and the LCA provides a warning that false representations may lead to criminal prosecution. Except in limited circumstances, the LCA must be filed electronically. Upon filing, the employer is required by regulation to print and sign a copy. The employer is further required to maintain the signed copies in its files.

d. After the DOL approves the LCA, which approvals are primarily based on the employer's representations in the LCA, the employer must then obtain permission from the United States Department of Homeland Security, United States Citizenship and Immigration Services ("USCIS"), to hire a specific individual. This approval is obtained by filing a Petition for a Non-immigrant Worker, Form I-129, and paying certain fees. In this petition, the employer is required to truthfully provide biographical information regarding the specific foreign worker to be employed. The employer also provides much of the same information contained on the LCA, including job title, the specific type of position for which the worker is hired, work location, pay rate, dates of intended employment, and whether the position is full-time. The petition is signed under penalty of perjury, and the employer must certify that the information submitted is true and correct.

e. The United States Government issues H1-B visas based on a random selection process, sometimes referred to as a lottery. Each year, the United States Government sets a quota for the number of H1-B visas it will issue. As part of the process, the employer/petitioner submits the H1-B petition (Form I-129) to the United States Government, together with supporting documents, such as LCAs, contracts, statements of work, and other employment verification documents, among other documents. If the foreign worker is not selected for the lottery, then the employer/petitioner receives a denial letter and the petition and supporting documents are returned. If, however, the foreign worker is selected by the lottery, then USCIS reviews the petition and supporting documents.

f. Once USCIS approves this petition, the foreign worker can apply for a visa at a United States embassy or consulate overseas. If the foreign worker is already lawfully in the United States, then the foreign worker's immigration status can be adjusted without the worker having to leave the country.

g. Once a visa is issued or an adjustment of status occurs, the foreign worker possesses lawful non-immigrant status and may reside in the United States and work for the employer until the visa expires or his or her employment with the company ends, whichever occurs first. The foreign worker may not immigrate, or permanently reside, in the United States under this type of visa. After approximately five years, the employer may petition USCIS for change in status for the foreign worker so he/she may obtain a Legal Permanent Resident status.

h. If the foreign worker is dismissed before the H-1B Visa expires, the employer must send notice to USCIS and pay for the foreign worker to return to his or her native country.

7. The Student Visa Program:

a. A foreign citizen who wishes to enter and remain in the United States on a temporary basis to pursue a course of study at a college, university, seminary, conservatory, academic high school, or other academic institution, or for English language training, must first obtain an F-1 non-immigrant visa, also known as a student visa ("F-1 visa").

b. An F-1 visa is only valid for a temporary period, called the "duration of status," which status lasts as long as the foreign citizen is enrolled as a full-time student in an approved educational program and making normal progress toward completion of the course of study. Under 8 C.F.R. § 214.2(f)(6), a full course of study for a foreign citizen studying a language or other non-vocational training program under an F-1 visa (an "F-1 student") requires eighteen (18) clock hours of attendance per week, assuming the dominant portion of the course consists of classroom instruction. Significantly, when a foreign citizen stops pursuing a full course of study, the duration of status on his or her F-1 visa ends and the temporary period for which the individual was admitted to the United States expires.

c. To obtain an F-1 visa, a foreign citizen must first apply to study at a school within the United States that has been certified by the Student and Exchange Visitor Program ("SEVP") to enroll and train foreign students. If accepted, the school will provide the foreign citizen with a "Certificate of Eligibility for Non-immigrant (F-1) Student Status - For Academic and Language Students," also known as a Form I-20 A ("Form I-20"). The Form I-20 is required for the foreign citizen to obtain an F-1 visa. By issuing a Form I-20 to a foreign citizen, an SEVP-approved school certifies that the individual: (1) meets all standards of admission for the school based on a review of the student's application, transcripts, proof of financial responsibility, and other records; and (2) has been accepted for, and would be required to pursue, a full course of study.

d. Once a foreign citizen receives a Form I-20, that individual may apply for an F-1 visa. The foreign citizen can then use the F-1 visa and Form I-20 to enter and remain in the United States for the period of time he or she is granted. After a foreign citizen completes his or her course of study, that individual is typically required to depart the United States within 60 days. Conversely, if the foreign student fails to maintain status (e.g., stops attending school, drops below the full course of study without authorization, or works without authorization, etc.), the foreign student must immediately depart the United States.

e. The Student and Exchange Visitor Information System ("SEVIS") is an internet based data system that provides users with access to current information on non-immigrant foreign citizens, exchange aliens, and their dependents. Each Form I-20 that is issued by a school to a foreign citizen will contain a system-generated identification number. This number is referred to as the "SEVIS ID number." Generally, the SEVIS ID number remains the same as long as the foreign citizen maintains his or her valid, original non-immigrant status. This number will typically remain the same regardless of any changes or updates made by the school to the foreign citizen's record.

f. Once in the United States, a foreign citizen is generally permitted to transfer from one SEVP-certified school to another, as long as that individual maintains valid F-1 student status and is pursuing a full course of study. To effect such a transfer while maintaining valid status, a foreign citizen must first obtain a school acceptance letter and a SEVIS transfer form from the SEVP-certified school to which the student intends to transfer. The foreign citizen may then transfer to that school, obtain a Form I-20, and remain in the United States as long as he or she pursues a full course of study at the new SEVP-certified school.

g. In addition to taking a full course of study at an accredited institution, an F-1 student may also seek practical training—which training could include paid employment—that is directly related to the student's major and is considered part of the student's program of study. The two types of practical training available to F-1 students include curricular practical training ("CPT") and optional practical training ("OPT"). If approved by the principal designated school official, an F-1 student may obtain a new Form I-20 indicating that he or she has been approved for either CPT or OPT. Generally, therefore, as long as an F-1 student has been properly enrolled at an SEVP certified school, has taken classes and earned credits, and has made academic progress toward graduation, that F-1 student may have the opportunity to work full or part-time CPT or OPT, in addition to taking classes.

Overview of the Schemes

8. The investigation, including information from open sources, reveals that ABBAS is the primary owner and operator of Fastnet, and this business operates in the IT field. Furthermore, ABBAS, on behalf of Fastnet, petitions USCIS to obtain H-1B visas on behalf of foreign workers.

9. At various times beginning in or about 2010, advertisements appeared on the Internet indicating that Fastnet was seeking to hire workers, especially foreign workers, in the IT field.

10. In or about October 2013, ABBAS was introduced to UC-1 through a third party. Thereafter, ABBAS met with UC-1 in person, spoke with UC-1 over the telephone, and engaged in e-mail communications with UC-1. These conversations were consensually recorded and the e-mail communications were retained as evidence.

11. On or about October 2, 2013, ABBAS, UC-1, and a third party (hereinafter the "Individual") spoke over the telephone. During this consensually recorded call, ABBAS was introduced to UC-1, and they discussed the School and obtaining student visas for non-immigrants. The following conversation ensued, in substance and in part:

Individual: Nayyer [ABBAS] was talking about, and he's really interested in working with us . . . to bring in more students to the school [School].

UC-1: Okay.

* * * *

ABBAS: [H]ow can we work together, so we can get some business, and we can both get benefits?

* * * *

UC-1: [W]e [the School] give them [non-immigrant students], essentially like an internship credit, we'll give them full, a full year's worth of credits for the work, and we you know, basically write it off as they've done a paper or something like that, which . . . they don't do . . . that's how we mark it in our system [W]e give them a grade, whether they want an A or a B, whatever

* * * *

UC-1: [W]e put them in some classes for basically, for a semester, showing that they've taken fifteen credits, even though they're not coming to class, they don't have to come in, we have them sign the attendance ahead of time, then we graduate them, and then what they can do is, under our program, they could then apply for OPT [to USCIS].

ABBAS: Okay.

* * * *

UC-1: [W]e stay away from . . . online classes, we stay away from all that stuff. I'd rather just have a student come in once a month, every couple of months, whatever, sign for the attendance, we give them a grade, they're happy. You know, and like I said, if they wanna actually . . . learn something, they can go to a different place, and I'm . . . not insulted. . . . [W]e'll just part ways, it's a business agreement, you know? It's a business dealing.

* * * *

ABBAS: [W]hat we can do, we can see one case, and let's see how it goes . . . if we come, if we bring in someone from Pakistan, we can take one case and let's see how it goes, and then we can . . . if it works smoothly, and then we can start slowly to build the process.

During this same consensually recorded call, ABBAS, UC-1, and the Individual discussed obtaining foreign worker visas (H1-B visas) for non-immigrants. ABBAS suggested that they use the School to create a fictitious project to deceive USCIS into issuing H1-B visas for ABBAS' foreign workers. The following conversation ensued, in substance and in part:

ABBAS: Yeah, so let me . . . explain [to] you . . . how it works. For H1-B, you need a client letter, client letters which show that he [non-immigrant] need a project. Okay? H1-B, they need some kind of letter. They [USCIS] wanna make sure he, he or he, she has a job before we are getting them on board. So let's suppose you have a school, so we can get the letter, okay. We got the

project from you, like its . . . 'we got this software development project for you,' and on the basis of that software development, we need. . . . So basically, the letter will show, you [the School] are giving us a project, and we [ABBAS's company] are working for you. So that kind of thing. I mean, but not . . . everything will be written by the lawyer, I mean. So, that kind of thing. You know?

* * * *

ABBAS: [W]e have to show the USCIS, if we are taking some guys for H-1B, we have to show a project. So how we can show a project? We can show them . . . because we got the software development project from your school, and we are developing a software from your school that's for, like student software in .NET and Java, and for them it's a lengthy project. We have to give them [the non-immigrants sought to be sponsored under the H1-B Program] a credibility

* * * *

UC-1: I don't need . . . any developing of software right now but if you need a, how many of these letters [fictitious employment letters and contracts] are we talking about? You need just one for . . . one or two students? Or are we talking about like . . . ten letters, fifty letters?

ABBAS: [W]e don't want to be started like ten or fifteen, like maybe like three and four, and let's see how it goes.

12. On or about December 10, 2013, ABBAS and UC-1 spoke over the telephone. During this consensually recorded call, ABBAS and UC-1 discussed obtaining visas for non-immigrants. The following conversation ensued, in substance and in part:

ABBAS: You know, [the] sky is the limit. . . . I will do as many [student visas and foreign worker visas] as we can so it can benefit both of us. . . . I've been planning to open an office in Pakistan, so we can get all that B1, B2 guys [meaning obtain student and/or foreign worker visas

for individuals from Pakistan with tourist visas]. We can give it to you [the business to the School], and plus we can . . . it's like a continuously case [sic] I'm planning to do continuously with you. Like every month, some business. You know what I mean? After ones that got approved.

Later during the same conversation, ABBAS discussed how he was recruiting aliens to enter the United States by boasting about his connections with UC-1 and the School and discussing two pending fraudulent student visa cases with the School:

ABBAS: Of course they have to give the money, but we are trying to help them out. So I told them [the aliens seeking status in the United States], I have a lot of connections, I will told them, 'hey, we are helping them out, and these are the two guys we helped them out and they are fine, they are doing fine, and we can help them out too.' [W]e are trying . . . we are trying to help them out too. So I can build a lot of good relationship, I mean, good business, which I can bring right away, once these two [student visas cases] go smoothly.

* * * *

ABBAS: [P]ut all the pricing in the email, so everybody have a[] clear pictures [sic], so, everybody have . . . we'll be on the same page. [P]ut on the price, whatever we discussed please, and I will confirm you. Okay?

In response to this conversation, on or about December 10, 2013, UC-1 sent an e-mail to ABBAS that stated the following, in substance and in part:

[ABBAS]

Per out telephone conversation I agree to charge the following:

\$1000 – Up front to do the filing.

After the filing is approved . . .

\$2000 – to provide your client one year status and full time CPT – no classes required – so they can work

Please confirm with me that this arrangement works for you [which confirmation ABBAS provided in a subsequent e-mail].

13. As part of the Student Visa Program, the prospective student must establish that he or she can afford to attend school in the United States for the duration of the academic program. Typically, USCIS requires the applicant to submit financial records, such as bank statements, to establish the financial bona fides of the applicant. In furtherance of the scheme to fraudulently obtain status in the United States through the Student Visa Program, ABBAS and UC-1 discussed creating a fictitious bank statement for an alien from Pakistan with the initials H.J. On or about December 20, 2013, UC-1 e-mailed ABBAS various documents needed for H.J.'s change of status from non-immigrant visitor to non-immigrant student, including a fictitious bank statement and a false acceptance letter from the School, which documents were provided by UC-1. The bank statement falsely represented that H.J. had approximately \$24,000 in his/her checking account. Thereafter, in or about early 2014, ABBAS submitted, or caused to be submitted to USCIS, H.J.'s change of status application, which application included the false bank statement, fictitious acceptance letter, and other false statements and documents.

14. On or about March 5, 2014, ABBAS sent UC-1 an e-mail containing a word document attachment. The file name for the word document attachment was "Client Letter.docx." In the body of the e-mail, ABBAS wrote, in substance and in part: "I am attaching the sample client letter for your review, it's not final, but it will be something like this, just need to put your letterhead and sign once I let you know. Thanks Nayyer." This client letter, drafted by ABBAS or someone at his direction, pertained to an individual with the initials A.A.M., an apparent non-immigrant from India seeking an H1-B visa, and stated the following, in substance and in part:

This letter serves to confirm that [A.A.M.] will work for us [the School] as a Consultant in the Position of Network Engineer for [the School in New Jersey].

General Purpose: Provide expertise to acquire, manage, manipulate, and analyze data and report results.

* * * *

Project Duration:

We currently consider this assignment to be open ended. This is an ongoing project and expected to continue for the next three years.

Employment Relationship:

While the consultant [A.A.M.] will work for us [the School] through Fastnet Software International, Inc., this fact shall not render [the School] liable as an employer. Rather, the actual employer company Fastnet Software International, Inc., shall function as [A.A.M.'s] employer and is responsible for all Immigration issues, payroll

UC-1, in furtherance of the undercover operation, placed the template on the School's letterhead, signed the client letter, and e-mailed them back to ABBAS. The fictitious client letter for A.A.M. was then transmitted to USCIS by ABBAS in support of A.A.M.'s H1-B visa petition, as described below. The letter, however, was completely fictitious because A.A.M. would not be employed by the School in any capacity. Furthermore, the School never established or had any projects for or with A.A.M. or Fastnet.

15. On or before April 1, 2014, ABBAS submitted a Form I-129 to USCIS on behalf of Fastnet for A.A.M., the non-immigrant from India described above. ABBAS signed the Form I-129 under penalty of perjury, representing that A.A.M. would be employed by Fastnet as a "Network Engineer" for approximately three years as a full-time employee at the School. The petition stated that A.A.M. was located in Saudi Arabia at the time it was submitted to USCIS. In addition and in support of the petition for A.A.M., ABBAS also signed an LCA, dated on or about March 25, 2014. On this form, ABBAS was advised that making a false representing on the form could result in criminal and civil penalties. On the LCA for A.A.M., ABBAS falsely represented that A.A.M. would be working at the School and earning approximately \$70,000 per year. Furthermore, in support of this petition, ABBAS included a copy of the fraudulent client letter, referred to above, bearing the School's letterhead and UC-1's signature, together with other false documents from the School, including a bogus "Statement of Work"—i.e., a contract between Fastnet, signed by ABBAS, and the School, and a "Consulting Service Agreement." This H1-B visa was never issued to A.A.M. by the United States Government.

16. On or before April 2, 2014, ABBAS submitted a Form I-129 to USCIS on behalf of Fastnet for an individual with the initials D.M., the non-immigrant from India seeking an H1-B visa. ABBAS signed the Form I-129 under penalty of perjury, representing that D.M. would be employed by Fastnet as a "Network Engineer" for approximately three years as a full-time employee at the School. In addition and in support of the petition for D.M., ABBAS also signed an LCA, dated on or about March 27, 2014. On this form, ABBAS was advised that making a false representing on the form could result in criminal and civil penalties. On the LCA for D.M., ABBAS falsely represented that D.M. would be

School's letterhead and signed by UC-1) and a false receipt back to ABBAS. In the e-mail, UC-1 stated the following, in substance and in part: "[A]ttached are the fake docs for [P.P.] so she can go for the visa interview." Later that day and in response to UC-1's e-mail, ABBAS wrote, "Thanks, Please also send me the acceptance letters for the university transfer student's [sic]. It's already late but we can still try to get them transfer."

18. In total, ABBAS fraudulently petitioned the United States and attempted to obtain approximately twenty H1-B visas, and ABBAS paid UC-1 approximately \$6,000 to fraudulently place foreign workers at the School and for the fraudulent documents needed for the visas. The United States Government did not issue any of these H1-B visas submitted by ABBAS.

19. In addition to engaging in H1-B visa fraud, as described above, ABBAS also committed, and attempted to commit student visa fraud. During the investigation, ABBAS paid UC-1 approximately \$17,750 in exchange for approximately 6 Forms I-20, falsely claiming that these aliens would be attending classes at the School.