

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Criminal No. 21-
 :
 v. :
 :
 ZEESHAN KHAN : 18 U.S.C. § 1349
 :

INFORMATION

The defendant having waived in open court prosecution by indictment, the Acting United States Attorney for the District of New Jersey charges:

The Defendant and Co-Conspirator

1. At all times relevant to this Information:
 - a. Defendant ZEESHAN KHAN (“defendant KHAN”), was an Indian citizen who resided in Pennsylvania and New Jersey.
 - b. Maaz Ahmed Shamsi (“Shamsi”), who is named as a co-conspirator but not as a defendant herein, also was an Indian citizen who resided in Pennsylvania and New Jersey.

The Conspiracy

2. From at least in or about January 2020 through in or about July 2020, in Hudson County, in the District of New Jersey, and elsewhere, defendant

ZEESHAN KHAN

did knowingly and intentionally conspire and agree with Maaz Ahmed Shamsi

and others to devise a scheme and artifice to defraud multiple victims, and to obtain money and property from multiple victims by means of materially false and fraudulent pretenses, representations, and promises, and, for the purpose of executing such scheme and artifice to defraud, did transmit and cause to be transmitted by means of wire communications in interstate and foreign commerce, certain signs, signals, and sounds, contrary to Title 18, United States Code, Section 1343.

The Object of the Conspiracy

3. It was the object of the conspiracy for defendant KHAN, Shamsi, and other conspiracy members to enrich themselves by using a variety of schemes and frauds to trick and coerce predominantly elderly victims into mailing or wiring cash to members of the conspiracy.

Manner and Means of the Conspiracy

4. As part of the conspiracy, unknown individuals operating call centers believed to be in India typically made contact with a victim in the United States by way of an automated, previously recorded call, commonly referred to as a “robocall.” The robocalls purported to be from a U.S. government or law enforcement agency—e.g., the Social Security Administration, the Internal Revenue Service, or the Federal Bureau of Investigation—and conveyed alarming messages, such as the consumer’s Social Security number or other personal information had been compromised, or the consumer was otherwise connected to an investigation involving

criminal activity. In reality, the consumer was neither under investigation nor in legal jeopardy, and the same threatening robocall was made simultaneously to thousands of other American consumers.

5. It was further part of the conspiracy that, when a victim answered one of these robocalls or returned a voicemail message, one or more members of the conspiracy would then speak with the victim and convince the victim they were speaking with a government official or law enforcement agent. The conspirator(s) offered to “resolve” these legal matters by immediate transfers of funds to settle the purported legal obligation, or to hold the consumer’s assets temporarily until the crisis could be resolved.

6. It was further part of the conspiracy that the conspirator(s) then tricked and coerced the victims to send cash to an address, supposedly belonging to a law enforcement or government agency. The victims were directed by the conspirator(s) to send cash via mail or a parcel delivery service to an address that the conspirators provided. Members of the conspiracy commonly referred to as “money mules” would then pick up the cash shipments, sometimes presenting counterfeit identifications. The money mules would then keep a small portion of the cash for themselves and transferred the bulk of the money to higher-level members of the conspiracy via wire transfers into various bank accounts or transmitted the funds using the informal money transfer system known as hawala.

7. It was further part of the conspiracy for conspirators commonly to

employ another technique involving refund fraud and remote computer access. In this scenario, one or more members of the conspiracy gained remote access to a victim's computer. It was part of the conspiracy that either a pop-up window appeared on the victim's computer displaying a phone number to call for "internet technical support services;" or the victim received a telemarketing call informing the victim that their previously purchased anti-virus software was not up to date.

8. It was further part of the conspiracy that, once the victim called the number displayed on their computer screen and/or followed the instructions of the tech support representative, the victim was told that the anti-virus and/or protection they previously purchased was not sufficient for the victim's computer and, as a result, they were entitled to a refund. The conspirator(s) convinced the victim that the refund could be issued via wire directly into the victim's bank account, but in order to do so, the victim was told, they must provide the conspirator(s) remote access to their computer.

9. It was further part of the conspiracy that, once a victim granted the conspirator(s) access to the victim's computer, the conspirator(s) moved United States currency from one of the victim's financial accounts to the victim's checking account, thus reflecting a significantly higher balance. As result of the transfer, the conspirator(s) advised the victim they were mistakenly overpaid—which the victim believed given the higher balance in their checking account—and convinced the victim that they must send the

money back via wire transfer and/or cash in the mail, as described above. The victim did not realize that the higher balance in their checking account was actually from their own funds transferred from another one of their accounts.

10. For these wire transfer frauds, money mules in the conspiracy would open bank accounts and the victims were advised to wire the funds into the money mules' accounts. The money mules would then keep a small portion of the funds for themselves and forward the remaining funds to higher-level members of the conspiracy as described in paragraph 6, above.

11. In furtherance of the conspiracy, Defendant KHAN and Shamsi operated as money mules in New Jersey and Pennsylvania.

12. It was part of the conspiracy that, between in or about January 2020 through in or about June 2020, defendant KHAN and Shamsi opened bank accounts at bank branches in New Jersey and Pennsylvania.

13. It was further part of the conspiracy that, after defendant Khan and Shamsi opened these bank accounts, they received or attempted to receive more than \$618,000 in wire transfers into the accounts in furtherance of the conspiracy as described below:

<u>VICTIM</u>	<u>DATE</u>	<u>WIRE AMOUNT</u>	<u>MONEY MULE</u>	<u>RECEIVING BANK</u>
VICTIM 1	01-22-2020	\$18,500	Shamsi	TRUIST FINANCIAL
VICTIM 2	01-28-2020	\$19,500	Shamsi	TRUIST FINANCIAL

VICTIM 3	01-28-2020	\$58,540	Shamsi	CITIZENS BANK
VICTIM 4	01-30-2020	\$29,655	Shamsi	M&T BANK
VICTIM 5	02-28-2020	\$39,000	Defendant KHAN	TD BANK
VICTIM 6	03-02-2020	\$49,447.23	Defendant KHAN	TD BANK
VICTIM 7	03-06-2020	\$28,500	Shamsi	CITIBANK
VICTIM 8	02-28-2020	\$49,500	Shamsi	CAPITAL ONE BANK
VICTIM 8	03-03-2020	\$49,500	Shamsi	CAPITAL ONE BANK
VICTIM 9	04-14-2020	\$9,500	Shamsi	WELLS FARGO BANK
VICTIM 10	01-23-2020	\$30,000	Defendant KHAN	BB&T BANK
VICTIM 11	04-14-2020	\$14,100	Defendant KHAN	CAPITAL ONE BANK
VICTIM 12	01-27-2020	\$49,499	Defendant KHAN	PNC BANK
VICTIM 13	04-16-2020	\$19,300	Defendant KHAN	CAPITAL ONE BANK
VICTIM 14	01-22-2020	\$29,459	Shamsi	PNC BANK
VICTIM 15	2-28-2020	\$30,000	Defendant KHAN	WELLS FARGO BANK
VICTIM 16	4-21-2020	\$5,000	Defendant KHAN	CAPITAL ONE BANK
VICTIM 17	06-11-2020	\$10,000	Defendant KHAN	SANTANDER BANK
VICTIM 18	06-08-2020	\$49,400	Defendant KHAN	SANTANDER BANK
VICTIM 19	05-01-2020	\$29,600	Shamsi	SANTANDER BANK
	TOTAL	\$618,000.23		

All in violation of Title 18, United States Code, Section 1349.

Rachael A. Honig
RACHAEL A. HONIG
Acting United States Attorney

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UNITED STATES OF AMERICA

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ZEESHAN KHAN

INFORMATION FOR

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