

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon.
 :
 v. :
 : Crim. No. 13-
 BABAR QURESHI :
 IJAZ BUTT : 18 U.S.C. §§ 1343, 1349 and 2
 AZHAR IKRAM :
 KHAWAJA IKRAM :
 VINOD DADLANI :
 VIJAY VERMA :
 TARSEM LAL :
 HABIB CHAUDHRY :
 MUHAMMAD NAVEED, and :
 AMAR SINGH :
 :
 :

I N D I C T M E N T

The Grand Jury, in and for the District of New Jersey,
sitting at Newark, charges:

COUNT ONE
(Bank Fraud Conspiracy)
(All Defendants)

INTRODUCTION

1. The defendants named in this Indictment, along with others (collectively, the "Co-Conspirators") operated a credit card "bust out" scheme (the "Fraud Enterprise") that spanned multiple states, involved the creation of false identities and fraudulent identification documents, and caused millions of dollars in losses.

2. At all times relevant to this Indictment:

a. Credit cards, issued by banks and other financial

institutions (the "Card Issuers"), allowed consumers to obtain goods and services with the understanding that the consumers would repay the Card Issuers pursuant to contractual agreements between the consumers and the Card Issuers.

b. Certain Card Issuers, who suffered losses as part of the scheme and artifice to defraud described below, were "financial institutions," as that term is defined in Title 18, United States Code, Section 20.

THE CONSPIRACY

3. From in or about 2003 through in or about February 2013, in the District of New Jersey, and elsewhere, defendants

BABAR QURESHI,
IJAZ BUTT,
AZHAR IKRAM,
KHAWAJA IKRAM,
VINOD DADLANI,
VIJAY VERMA,
TARSEM LAL,
HABIB CHAUDHRY,
MUHAMMAD NAVEED, and
AMAR SINGH

did knowingly and intentionally conspire and agree with each other and with others to execute a scheme and artifice to defraud financial institutions, and to obtain moneys, funds, credits, assets, securities, and other property owned by, and under the custody and control of, those financial institutions, by means of materially false and fraudulent pretenses, representations, and promises, contrary to Title 18, United States Code, Section 1344.

OBJECT OF THE CONSPIRACY

4. It was the object of the conspiracy for defendants BABAR QURESHI, IJAZ BUTT, AZHAR IKRAM, KHAWAJA IKRAM, VINOD DADLANI, VIJAY VERMA, TARSEM LAL, HABIB CHAUDHRY, MUHAMMAD NAVEED, AMAR SINGH and their Co-Conspirators to profit by unlawfully obtaining money and property through the use of credit cards.

MANNER AND MEANS OF THE CONSPIRACY

5. It was part of the conspiracy that the Co-Conspirators operated a credit card "bust out" scheme--that is a scheme to obtain credit cards, use the cards to make charges, and then fail to make payments. To effectuate this scheme, the Co-Conspirators created false identities, obtained fraudulent credit cards (the "Fraud Cards") and stole funds from financial institutions. The scheme generally involved three steps: (1) making up false identities; (2) pumping up the credit of the false identities; and (3) running up credit card debts using the false identities.

Step 1: Making up False Identities

6. It was further part of the conspiracy that the Co-Conspirators created false identities. In some instances, all information about the identity was fabricated. In other instances, while the social security number used by the false identity matched someone with the same name, the remaining information was fabricated.

7. It was further part of the conspiracy that the Co-

Conspirators created fraudulent identity documents for the false identities.

8. It was further part of the conspiracy that certain of the Co-Conspirators applied for Fraud Cards in the names of false identities. The majority of the Fraud Cards were applied for online, some from the homes of certain of the Co-Conspirators.

9. It was further part of the conspiracy that the Co-Conspirators used "drop addresses" to receive mail related to the Fraud Cards. The Co-Conspirators used individuals to collect the mail relating to the Fraud Cards from the drop addresses and deliver it to locations used by the Co-Conspirators.

Step 2: Pumping up the Credit

10. It was further part of the conspiracy that certain of the Co-Conspirators would "pump up," or increase, the credit available to the false identities they had created. This was accomplished in several ways:

a. The Co-Conspirators increased certain false identities' credit by making numerous small transactions at different businesses and then paying off the small credit card balances on a timely basis.

b. The Co-Conspirators also increased false identities' credit by making fraudulent payments on the balances of the fraudulent credit cards using bank accounts that, while real, had insufficient funds to cover the payments.

c. The Co-Conspirators also increased false identities' credit by manipulating credit reports to make it appear as if an identity had incurred, and timely paid, significant debts.

Step 3: Running up Large Loans and Credit Card Debts

11. It was further part of the conspiracy that, once the Co-Conspirators had "pumped up" the credit history of the fraudulent credit cards, the Co-Conspirators would run up large credit card charges using the false identities. These credit card charges were never repaid, and the Co-Conspirators reaped the profits.

12. It was further part of the conspiracy that, to increase their ability to "cash out" the Fraud Cards, the Co-Conspirators created sham companies that did little or no legitimate business (the "Sham Companies"). The Co-Conspirators then obtained credit card terminals for certain Sham Companies, and ran up charges on the fraudulently obtained credit cards at these terminals. Several of these Sham Companies were located in New Jersey.

13. It was further part of the conspiracy that the Co-Conspirators funneled the illicit profits from the scheme to themselves through payments from the Sham Companies, by checks made out to the Co-Conspirators and others from accounts created using the false identities, and by other means.

14. In this fashion, the Co-Conspirators caused millions of

dollars in losses.

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

COUNTS TWO THROUGH TWENTY-FIVE

(Wire Fraud)

(Defendants BABAR QURESHI, IJAZ BUTT,
AZHAR IKRAM, KHAWAJA IKRAM, VINOD DADLANI,
VIJAY VERMA, and TARSEM LAL)

15. The allegations set forth in Paragraphs 1, 2, and 5 through 14 of Count One above are hereby repeated, realleged and incorporated as if fully set forth herein.

16. On or about the dates set forth below, in the District of New Jersey, and elsewhere, having devised and intending to devise a scheme and artifice to defraud and to obtain money and property from financial institutions by means of materially false and fraudulent pretenses, representations, and promises, for the purpose of executing the scheme and artifice, the defendants listed below knowingly and intentionally transmitted and cause to be transmitted by means of wire communications in interstate and foreign commerce the following writings, signs, signals, pictures and sounds, each constituting a separate count of this Indictment:

Count	Defendant	Approximate Date	Description
2	VINOD DADLANI	March 19, 2007	Fraudulent credit card charge in the name A.R. on VINOD DADLANI's credit card terminal
3	VINOD DADLANI	April 13, 2008	Fraudulent credit card charge in the name A.S. on VINOD DADLANI's credit card terminal
4	VIJAY VERMA	June 22, 2008	Fraudulent credit card charge in the name R.D. on VIJAY VERMA's credit card terminal

Count	Defendant	Approximate Date	Description
5	TARSEM LAL	June 22, 2008	Fraudulent credit card charge in the name R.D. on TARSEM LAL's credit card terminal
6	VIJAY VERMA	June 25, 2008	Fraudulent credit card charge in the name M.R. on VIJAY VERMA's credit card terminal
7	TARSEM LAL	June 25, 2008	Fraudulent credit card charge in the name M.R. on TARSEM LAL's credit card terminal
8	TARSEM LAL	June 25, 2008	Fraudulent credit card charge in the name M.R. on TARSEM LAL's credit card terminal
9	VINOD DADLANI	September 10, 2008	Fraudulent credit card charge in the name A.S. on VINOD DADLANI's credit card terminal
10	VINOD DADLANI	September 23, 2008	Fraudulent credit card charge in the name A.S. on VINOD DADLANI's credit card terminal
11	VIJAY VERMA	November 11, 2008	Fraudulent credit card charge in the name A.S. on VIJAY VERMA's credit card terminal
12	TARSEM LAL	November 11, 2008	Fraudulent credit card charge in the name A.S. on TARSEM LAL's credit card terminal
13	TARSEM LAL	January 15, 2009	Fraudulent credit card charge in the name A.S. on TARSEM LAL's credit card terminal
14	AZHAR IKRAM	January 20, 2009	Fax from AZHAR IKRAM to merchant processor requesting payment for a fraudulent credit card swipe
15	BABAR QURESHI	March 16, 2009	Bank transfer from bank account of false identity S.A. to bank account of BABAR QURESHI
16	BABAR QURESHI	May 1, 2009	Bank transfer from bank account of false identity F.S. to bank account of BABAR QURESHI

Count	Defendant	Approximate Date	Description
17	IJAZ BUTT	January 5, 2011	Email to IJAZ BUTT from co-conspirator regarding fraudulent information for identity A.S.
18	IJAZ BUTT	April 22, 2011	Email from IJAZ BUTT to co-conspirator regarding fraudulent driver's license for identity R.S.
19	IJAZ BUTT	April 22, 2011	Email to IJAZ BUTT from co-conspirator regarding fraudulent driver's license for identity I.K.
20	KHAWAJA IKRAM	May 19, 2011	Email to KHAWAJA IKRAM regarding fraudulent identity documents for a identity M.A.
21	KHAWAJA IKRAM	June 20, 2011	Fraudulent credit card charge in the name M.A. on KHAWAJA IKRAM's credit card terminal
22	BABAR QURESHI	August 9, 2011	Text message to co-conspirator from BABAR QURESHI with credit card information for fraudulent identity R.A.
23	KHAWAJA IKRAM	August 15, 2011	Fraudulent credit card charge in the name M.A. on KHAWAJA IKRAM's credit card terminal
24	AZHAR IKRAM	December 7, 2012	Fraudulent credit card charge in the name S.S. on AZHAR IKRAM's credit card terminal
25	AZHAR IKRAM	December 9, 2012	Fraudulent credit card charge in the name S.S. on AZHAR IKRAM's credit card terminal

In violation of Title 18, United States Code, Section 1343 and Section 2.

FORFEITURE ALLEGATION AS TO COUNT ONE
(18 U.S.C. §§ 1344, 1349 - bank fraud conspiracy)

1. The allegations contained in this Indictment are hereby realleged and incorporated by reference for the purpose of noticing forfeiture pursuant to Title 18, United States Code, Section 982(a)(2)(A).

2. Upon conviction of the offense charged in Count One of this Indictment, defendants BABAR QURESHI, IJAZ BUTT, AZHAR IKRAM, KHAWAJA IKRAM, VINOD DADLANI, VIJAY VERMA, TARSEM LAL, HABIB CHAUDHRY, MUHAMMAD NAVEED, and AMAR SINGH shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(2)(A), any and all property constituting or derived from proceeds obtained directly or indirectly as a result of such offense, including but not limited to:

a. At least \$100,000,000, a sum of money representing the amount of proceeds obtained as a result of the said offense, and all property traceable to such property, for which the defendants are jointly and severally liable.

b. Such sum includes, but is not limited to, all right, title and interest of the defendants in the following specific property:

i. All right, title and interest of defendant BABAR QURESHI in approximately \$225,871.35 formerly on deposit in Investment Account No. 756-022187 at TD Ameritrade, held in the names of BABAR H. QURESHI and Shabana Babar, JTWROS;

ii. All right, title and interest of defendant BABAR QURESHI in all funds and other property on deposit in Account No. 424512596 at the Royal Bank of Canada, held in the names of BABAR QURESHI and Shabana Babar;

iii. All right, title and interest of defendant BABAR QURESHI in all funds and other property on deposit in Forex Investment Account No. 10266008 at Gain Capital Group, LLC, held in the names of BABAR QURESHI and Shabana Babar;

iv. All right, title and interest of defendant BABAR QURESHI in the assets of 3259 SUNRISE REALTY, LLC, including but not limited to the gasoline service station business located at 3259 Sunrise Highway, Islip Terrace, New York 11752 and its attendant interests in real property, fixtures, equipment and personal property;

v. All right, title and interest in that lot or parcel of land, together with its building buildings, appurtenances, improvements, fixtures, attachments and easements, located at 106 Middlesex Avenue, Iselin, Woodbridge Township, NJ 08830;

vi. Contents of any and all safe deposit boxes held by BABAR QURESHI at Bank of America, N.A. in Iselin, New Jersey;

vii. All right, title and interest of defendant KHAWAJA IKRAM in approximately 18 Sony Vaio laptop computers

seized from 190 Ada Dr., 1st Floor, Staten Island, New York 10314 on or about February 5, 2013;

viii. All right, title and interest in the inventory and other valuable and readily salable assets of Tanishq Jewels, Inc., D/B/A Nikita's Inc., 804 Newark Avenue, Jersey City, New Jersey 07306, including but not limited to jewelry, precious metals and stones, money and other valuables;

ix. All right, title and interest of defendant VINOD DADLANI in that lot or parcel of land, together with its building buildings, appurtenances, improvements, fixtures, attachments and easements, located at 638 Milton Avenue, Lyndhurst, New Jersey 07071;

x. Contents of any and all safe deposit boxes held by VINOD DADLANI at Capital One Bank;

xi. All right, title and interest in the inventory and other valuable and readily salable assets of Raja Jewelers, located at 820 Newark Avenue, Jersey City, New Jersey 07306, including but not limited to jewelry, precious metals and stones, money and other valuables;

xii. All right, title and interest in the real property and appurtenances located at 95 Pershing Avenue, Iselin, Woodbridge Township, New Jersey 08830, with all improvements and attachments thereon;

xvii. All right, title and interest of defendant HABIB CHAUDHRY in that lot or parcel of land, together with its building buildings, appurtenances, improvements, fixtures, attachments and easements, located at 9 South Georgia Street, Valley Stream, Nassau County, New York 11580,

And all property traceable to such property.

FORFEITURE ALLEGATION AS TO COUNTS TWO THROUGH TWENTY-FIVE
(18 U.S.C. § 1343 - wire fraud)

3. The allegations contained in this Indictment are hereby realleged and incorporated by reference for the purpose of noticing forfeiture pursuant to Title 18, United States Code, Section 982(a)(2)(A).

4. Upon conviction of one or more the offenses charged in Counts Two through Twenty-Five of this Indictment, defendants BABAR QURESHI, IJAZ BUTT, AZHAR IKRAM, KHAWAJA IKRAM, VINOD DADLANI, VIJAY VERMA, and TARSEM LAL shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(2)(A), any and all property constituting or derived from proceeds obtained directly or indirectly as a result of such offense(s).

Substitute Asset Provision

5. If any of the above-described forfeitable 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 person;
- 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 which cannot be subdivided without difficulty; it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. § 982(b), to seek forfeiture of any other property of the defendants up to the value of the above forfeitable property.

A TRUE BILL

FOREPERSON



PAUL J. FISHMAN
UNITED STATES ATTORNEY