

Presented to the Court by the foreman of the  
Grand Jury in open Court, in the presence of  
the Grand Jury and FILED in the U.S.  
DISTRICT COURT at Seattle, Washington.

April 24 2024  
Ravi Subramanian, Clerk  
By [Signature] Deputy

UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

UNITED STATES OF AMERICA,  
Plaintiff

v.

1. RAJAT RAJAT,  
2. SUSHIL KUMAR,  
3. BOBBY JOE GREEN, and  
4. FNU SNEHA,  
Defendants.

NO. **CR 24 - 071 TL**

**INDICTMENT**

The Grand Jury charges that:

**COUNT 1**

**(Conspiracy to Bring In and Transport Certain Aliens for Profit)**

Beginning at a time unknown, and continuing until at least December 31, 2023, in  
Whatcom County, within the Western District of Washington, and elsewhere, RAJAT  
RAJAT, SUSHIL KUMAR, BOBBY JOE GREEN, and FNU SNEHA, and others known  
and unknown, did knowingly and intentionally conspire to bring to the United States  
certain aliens, knowing that said persons were aliens, at a place other than a designated  
port of entry and at a place other than as designated by the Secretary of the Department of

Homeland Security, and to transport and move certain aliens, who had come to, entered, and remained in the United States in violation of law, within the United States by means of transportation and otherwise, in furtherance of such violation of law to help certain aliens remain in the United States illegally, and did so for private financial gain.

All in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(i), (ii) and (v)(I), and 1324(a)(1)(B)(i).

### **COUNT 2**

#### **(Bringing Alien into U.S. at Place Other Than a Designated Port of Entry)**

On or about November 27, 2023, in Whatcom County, within the Western District of Washington, RAJAT RAJAT, SUSHIL KUMAR, and BOBBY JOE GREEN did knowingly bring to the United States an alien, N.K., knowing that N.K. was an alien, at a place other than a designated port of entry and at a place other than as designated by the Secretary of the Department of Homeland Security, and did aid and abet the same.

All in violation of Title 8, United States Code, Section 1324(a)(1)(A)(i) and Title 18, United States Code, Section 2.

### **COUNT 3**

#### **(Bringing Alien into U.S. at Place Other Than a Designated Port of Entry)**

On or about November 27, 2023, in Whatcom County, within the Western District of Washington, RAJAT RAJAT, SUSHIL KUMAR, and BOBBY JOE GREEN did knowingly bring to the United States an alien, A.A., knowing that A.A. was an alien, at a place other than a designated port of entry and at a place other than as designated by the Secretary of the Department of Homeland Security, and did aid and abet the same.

All in violation of Title 8, United States Code, Section 1324(a)(1)(A)(i) and Title 18, United States Code, Section 2.

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**COUNT 4**

**(Bringing Alien into U.S. at Place Other Than a Designated Port of Entry)**

On or about November 27, 2023, in Whatcom County, within the Western District of Washington, RAJAT RAJAT, SUSHIL KUMAR, and BOBBY JOE GREEN did knowingly bring to the United States an alien, S.K., knowing that S.K. was an alien, at a place other than a designated port of entry and at a place other than as designated by the Secretary of the Department of Homeland Security, and did aid and abet the same.

All in violation of Title 8, United States Code, Section 1324(a)(1)(A)(i) and Title 18, United States Code, Section 2.

**COUNT 5**

**(Bringing Alien into U.S. at Place Other Than a Designated Port of Entry)**

On or about November 27, 2023, in Whatcom County, within the Western District of Washington, RAJAT RAJAT, SUSHIL KUMAR, and BOBBY JOE GREEN did knowingly bring to the United States an alien, A.L., knowing that A.L. was an alien, at a place other than a designated port of entry and at a place other than as designated by the Secretary of the Department of Homeland Security, and did aid and abet the same.

All in violation of Title 8, United States Code, Section 1324(a)(1)(A)(i) and Title 18, United States Code, Section 2.

**COUNT 6**

**(Bringing Alien into U.S. at Place Other Than a Designated Port of Entry)**

On or about November 27, 2023, in Whatcom County, within the Western District of Washington, RAJAT RAJAT, SUSHIL KUMAR, and BOBBY JOE GREEN did knowingly bring to the United States an alien, P.K., knowing that P.K. was an alien, at a place other than a designated port of entry and at a place other than as designated by the Secretary of the Department of Homeland Security, and did aid and abet the same.

All in violation of Title 8, United States Code, Section 1324(a)(1)(A)(i) and Title 18, United States Code, Section 2.

**COUNT 7****(Bringing Alien into U.S. at Place Other Than a Designated Port of Entry)**

On or about December 31, 2023, in Whatcom County, within the Western District of Washington, RAJAT RAJAT, BOBBY JOE GREEN, and FNU SNEHA, did knowingly bring to the United States an alien, A.(N),<sup>1</sup> knowing that A.(N) was an alien, at a place other than a designated port of entry and at a place other than as designated by the Secretary of the Department of Homeland Security, and aid and abet the same.

All in violation of Title 8, United States Code, Section 1324(a)(1)(A)(i) and Title 18, United States Code, Section 2.

**COUNT 8****(Bringing Alien into U.S. at Place Other Than a Designated Port of Entry)**

On or about December 31, 2023, in Whatcom County, within the Western District of Washington, RAJAT RAJAT, BOBBY JOE GREEN, and FNU SNEHA, did knowingly bring to the United States an alien, S.(N),<sup>2</sup> knowing that S.(N) was an alien, at a place other than a designated port of entry and at a place other than as designated by the Secretary of the Department of Homeland Security, and did aid and abet the same.

All in violation of Title 8, United States Code, Section 1324(a)(1)(A)(i) and Title 18, United States Code, Section 2.

**COUNT 9****(Bringing Alien into U.S. at Place Other Than a Designated Port of Entry)**

On or about December 31, 2023, in Whatcom County, within the Western District of Washington, RAJAT RAJAT, BOBBY JOE GREEN, and FNU SNEHA, did knowingly bring to the United States an alien, Su.K., knowing that Su.K. was an alien, at

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<sup>1</sup> A.(N) does not have a last name listed in their passport or other government-issued documents. In this indictment, the "(N)" stands for "none."

<sup>2</sup> S.(N) does not have a last name listed in their passport or other government-issued documents. In this indictment, the "(N)" stands for "none."

1 a place other than a designated port of entry and at a place other than as designated by the  
2 Secretary of the Department of Homeland Security, and did aid and abet the same.

3 All in violation of Title 8, United States Code, Section 1324(a)(1)(A)(i) and  
4 Title 18, United States Code, Section 2.

5 **COUNT 10**

6 **(Attempted Illegal Transportation of an Alien, Private Financial Gain)**

7 On or about November 27, 2023, in Whatcom County, within the Western  
8 District of Washington, and elsewhere, RAJAT RAJAT, SUSHIL KUMAR, and BOBBY  
9 JOE GREEN, knowing and in reckless disregard of the fact that a certain alien, N.K., had  
10 come to, entered, and remained in the United States in violation of law, did attempt to  
11 transport and move said alien within the United States by means of transportation and  
12 otherwise in furtherance of such violation of law to help N.K. remain in the United States  
13 illegally, and did so for private financial gain, and did aid and abet the same.

14 All in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(ii) and  
15 1324(a)(1)(B)(i), and Title 18, United States Code, Section 2.

16 **COUNT 11**

17 **(Attempted Illegal Transportation of an Alien, Private Financial Gain)**

18 On or about November 27, 2023, in Whatcom County, within the Western  
19 District of Washington, RAJAT RAJAT, SUSHIL KUMAR, and BOBBY JOE GREEN,  
20 knowing and in reckless disregard of the fact that a certain alien, A.A., had come to,  
21 entered, and remained in the United States in violation of law, did attempt to transport  
22 and move said alien within the United States by means of transportation and otherwise in  
23 furtherance of such violation of law to help A.A. remain in the United States illegally,  
24 and did so for private financial gain, and did aid and abet the same.

25 All in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(ii) and  
26 1324(a)(1)(B)(i), and Title 18, United States Code, Section 2.

**COUNT 12**

**(Attempted Illegal Transportation of an Alien, Private Financial Gain)**

On or about November 27, 2023, in Whatcom County, within the Western District of Washington, RAJAT RAJAT, SUSHIL KUMAR, and BOBBY JOE GREEN, knowing and in reckless disregard of the fact that a certain alien, S.K., had come to, entered, and remained in the United States in violation of law, did attempt to transport and move said alien within the United States by means of transportation and otherwise in furtherance of such violation of law to help S.K. remain in the United States illegally, and did so for private financial gain, and did aid and abet the same.

All in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(ii) and 1324(a)(1)(B)(i), and Title 18, United States Code, Section 2.

**COUNT 13**

**(Attempted Illegal Transportation of an Alien, Private Financial Gain)**

On or about November 27, 2023, in Whatcom County, within the Western District of Washington, RAJAT RAJAT, SUSHIL KUMAR, and BOBBY JOE GREEN, knowing and in reckless disregard of the fact that a certain alien, A.L., had come to, entered, and remained in the United States in violation of law, did attempt to transport and move said alien within the United States by means of transportation and otherwise in furtherance of such violation of law to help A.L. remain in the United States illegally, and did so for private financial gain, and did aid and abet the same.

All in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(ii) and 1324(a)(1)(B)(i), and Title 18, United States Code, Section 2.

**COUNT 14**

**(Attempted Illegal Transportation of an Alien, Private Financial Gain)**

On or about November 27, 2023, in Whatcom County, within the Western District of Washington, RAJAT RAJAT, SUSHIL KUMAR, and BOBBY JOE GREEN, knowing and in reckless disregard of the fact that a certain alien, P.K., had come to,



1 entered, and remained in the United States in violation of law, did attempt to transport  
 2 and move said alien within the United States by means of transportation and otherwise in  
 3 furtherance of such violation of law to help P.K. remain in the United States illegally, and  
 4 did so for private financial gain, and did aid and abet the same.

5 All in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(ii) and  
 6 1324(a)(1)(B)(i), and Title 18, United States Code, Section 2.

7 **COUNT 15**

8 **(Illegal Transportation and Attempted Illegal Transportation of an Alien,**  
 9 **Private Financial Gain)**

10 On or about December 31, 2023, in Whatcom County, within the Western District  
 11 of Washington, RAJAT RAJAT, BOBBY JOE GREEN, and FNU SNEHA, knowing and  
 12 in reckless disregard of the fact that a certain alien, A.(N), had come to, entered, and  
 13 remained in the United States in violation of law, did transport and move and attempt to  
 14 transport and move said alien within the United States by means of transportation and  
 15 otherwise in furtherance of such violation of law to help A.(N) remain in the United  
 16 States illegally, and did so for private financial gain, and did aid and abet the same.

17 All in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(ii) and  
 18 1324(a)(1)(B)(i), and Title 18, United States Code, Section 2.

19 **COUNT 16**

20 **(Illegal Transportation and Attempted Illegal Transportation of an Alien,**  
 21 **Private Financial Gain)**

22 On or about December 31, 2023, in Whatcom County, within the Western District  
 23 of Washington, RAJAT RAJAT, BOBBY JOE GREEN, and FNU SNEHA, knowing and  
 24 in reckless disregard of the fact that a certain alien, S.(N), had come to, entered, and  
 25 remained in the United States in violation of law, did transport and move and attempt to  
 26 transport and move said alien within the United States by means of transportation and  
 27

1 otherwise in furtherance of such violation of law to help S.(N) remain in the United  
 2 States illegally, and did so for private financial gain, and did aid and abet the same.

3 All in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(ii) and  
 4 1324(a)(1)(B)(i), and Title 18, United States Code, Section 2.

### 5 COUNT 17

#### 6 **(Illegal Transportation and Attempted Illegal Transportation of an Alien, 7 Private Financial Gain)**

8 On or about December 31, 2023, in Whatcom County, within the Western District  
 9 of Washington, RAJAT RAJAT, BOBBY JOE GREEN, and FNU SNEHA, knowing and  
 10 in reckless disregard of the fact that a certain alien, Su.K., had come to, entered, and  
 11 remained in the United States in violation of law, did transport and move and attempt to  
 12 transport and move said alien within the United States by means of transportation and  
 13 otherwise in furtherance of such violation of law to help Su.K. remain in the United  
 14 States illegally, and did so for private financial gain, and did aid and abet the same.

15 All in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(ii) and  
 16 1324(a)(1)(B)(i), and Title 18, United States Code, Section 2.

### 17 FORFEITURE ALLEGATION

18 The allegations contained in Counts 1 through 17 of this Indictment are hereby  
 19 realleged and incorporated by reference for the purpose of alleging forfeiture. Upon  
 20 conviction of any offense alleged in Counts 1 through 17, RAJAT RAJAT, SUSHIL  
 21 KUMAR, BOBBY JOE GREEN, and FNU SNEHA shall forfeit to the United States,  
 22 pursuant to Title 18, United States Code, Section 982(a)(6)(A), any property constituting,  
 23 or derived from, the proceeds Defendants obtained directly or indirectly, from the  
 24 offense, any property used to facilitate the offense, and any conveyance that was used in  
 25 the commission of the offense, and, pursuant to Title 8, United States Code, Section  
 26 1324(b)(1), by way of Title 28, United States Code, Section 2461(c), any conveyance  
 27



1 used in the offense, the proceeds of the offense, and any property traceable to such  
2 conveyance or proceeds.

3 **Substitute Assets.** If any of the above-described forfeitable property, as a result of  
4 any act or omission of the defendant,

- 5 a. cannot be located upon the exercise of due diligence;  
6 b. has been transferred or sold to, or deposited with, a third party;  
7 c. has been placed beyond the jurisdiction of the Court;  
8 d. has been substantially diminished in value; or,  
9 e. has been commingled with other property which cannot be divided  
10 without difficulty,

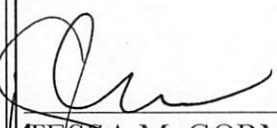
11 it is the intent of the United States to seek the forfeiture of any other property of the  
12 defendant, up to the value of the above-described forfeitable property, pursuant to  
13 Title 21, United States Code, Section 853(p).

14  
15 A TRUE BILL:

16 DATED: 4/24/24

17 *Signature of Foreperson redacted pursuant*  
18 *to the policy of the Judicial Conference of*  
*the United States.*

19 \_\_\_\_\_  
20 FOREPERSON

21   
22 TESSA M. GORMAN  
23 United States Attorney

24   
25 AMY JAQUETTE  
26 Assistant United States Attorney

27   
JIN U. KIM  
Assistant United States Attorney