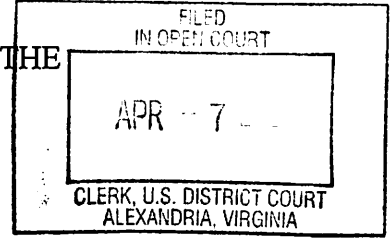


IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF VIRGINIA

Alexandria Division



UNITED STATES OF AMERICA

v.

ABID ALI KHAN,

Defendant.

) Case No. 1:21-cr-00068

) Count 1: Conspiracy to Encourage and Induce  
) an Alien to Unlawfully Enter the United States  
) (8 U.S.C. §§ 1324(a)(1)(A)(iv),  
) 1324(a)(1)(A)(v)(I), and 1324(a)(1)(B)(i))

) Counts 2-6: Encouraging and Inducing an  
) Alien to Unlawfully Enter the United States  
) (8 U.S.C. §§ 1324(a)(1)(A)(iv),  
) 1324(a)(1)(A)(v)(II), and 1324(a)(1)(B)(i))

) Counts 7-8: Bringing an Alien to the United  
) States (8 U.S.C. §§ 1324(a)(2) and  
) 1324(a)(2)(B)(ii) and 18 U.S.C. § 2)

INDICTMENT

April 2021 Term – Alexandria

General Allegations

THE GRAND JURY CHARGES THAT:

At all times relevant to this Indictment, unless otherwise indicated:

1. Defendant Abid Ali Khan was a citizen of Pakistan.
2. The defendant organized and led an international smuggling organization that smuggled Pakistan and Afghanistan nationals into the United States.
3. The defendant accepted payment in exchange for planning and coordinating the international travel for aliens to travel from Pakistan through multiple countries to include Brazil and the United States, offered or provided false documents for aliens to use for travel through

multiple countries, and instructed aliens that his co-conspirators would facilitate various parts of the travel between Pakistan and the United States.

**COUNT 1**

**(Conspiracy to Encourage and Induce an Alien to Unlawfully Enter the United States)**

THE GRAND JURY FURTHER CHARGES THAT:

The General Allegations of this Indictment are re-alleged and incorporated by reference as if fully set forth herein.

As early as in or about January 2015 and continuing until in or about December 2020, the exact dates being unknown to the Grand Jury, the defendant,

**ABID ALI KHAN,**

who is expected to be first brought to and found in the Eastern District of Virginia, for the purpose of commercial advantage and private financial gain, did knowingly and willfully conspire, confederate, and agree with others known and unknown to the Grand Jury, to commit offenses against the United States, that is, to encourage and induce an alien to come to, enter, and reside in the United States, knowing and in reckless disregard of the fact that such coming to, entry, and residence is and will be in violation of law.

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

**COUNTS 2-6**

**(Encouraging and Inducing an Alien to Unlawfully Enter the United States)**

THE GRAND JURY FURTHER CHARGES THAT:

The General Allegations of this Indictment are re-alleged and incorporated by reference as if fully set forth herein.

On or about the dates set forth below with respect to each count, the defendant,

**ABID ALI KHAN,**

who is expected to be first brought to and found in the Eastern District of Virginia, and others known and unknown to the Grand Jury, all aided and abetted by each other, for the purpose of commercial advantage and private financial gain, did knowingly encourage and induce an alien, as set forth in Counts 2 through 6 below, to come to, enter, and reside in the United States, knowing and in reckless disregard of the fact that such coming to, entry, and residence is and will be in violation of law:

<b>Count</b>	<b>Approximate Date (on or about)</b>	<b>Alien</b>
2	March 25, 2015	T.W.
3	June 9, 2016	S.A.
4	September 16, 2016	S.M.
5	October 30, 2016	W.K.
6	October 30, 2016	M.M.

(In violation of Title 8, United States Code, Sections 1324(a)(1)(A)(iv), 1324(a)(1)(A)(v)(II), and 1324(a)(1)(B)(i).)

**COUNTS 7-8**

**(Bringing an Alien to the United States)**

THE GRAND JURY FURTHER CHARGES THAT:

The General Allegations of this Indictment are re-alleged and incorporated by reference as if fully set forth herein.

On or about the dates set forth below with respect to each count, the defendant,

**ABID ALI KHAN,**

who is expected to be first brought to and found in the Eastern District of Virginia, and others known and unknown to the Grand Jury, all aided and abetted by each other, did knowingly bring and attempt to bring an alien, as set forth in Counts 7-8 below, to the United States for the purpose of commercial advantage and private financial gain, knowing and in reckless disregard of the fact that such alien had not received prior official authorization to come to, enter, and reside in the United States, regardless of any official action which might later be taken with respect to such alien:

<b>Count</b>	<b>Approximate Date (on or about)</b>	<b>Alien</b>
7	June 9, 2016	S.A.
8	October 30, 2016	M.M.

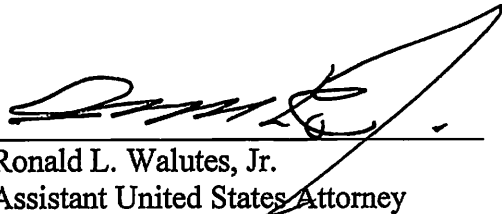
(In violation of Title 8, United States Code, Sections 1324(a)(2) and 1324(a)(2)(B)(ii), and Title 18, United States Code, Section 2.)

A TRUE BILL  
Pursuant to the E-Government Act,  
the original of this page has been filed  
under seal in the Clerk's Office.

\_\_\_\_\_  
Foreperson of the Grand Jury

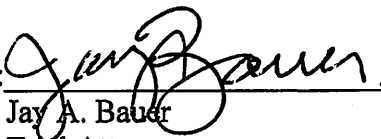
Raj Parekh  
Acting United States Attorney  
Eastern District of Virginia

By: \_\_\_\_\_

  
Ronald L. Walutes, Jr.  
Assistant United States Attorney

Nicholas L. McQuaid  
Acting Assistant Attorney General  
Criminal Division

By: \_\_\_\_\_

  
Jay A. Bauer  
Trial Attorney  
Human Rights and Special Prosecutions