

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

RASHID MINHAS

CASE NUMBER:  
**UNDER SEAL**

**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief. Beginning no later than March 2014 and continuing through at least November 2014, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere, the defendant violated:

*Code Section*

Title 18, United States Code, Section  
1341

*Offense Description*

On or about August 4, 2014, defendant Rashid Minhas, for the purpose of executing a scheme to defraud, knowingly caused to be delivered by the United States Postal Service to 5801 North Northwest Highway, Chicago, Illinois, a priority mail express package addressed to "Rashid Light Star Hajj 5801 Northwest Highway, Chicago, IL 60631" containing payment for travel packages purchased by Travel Agent A's customers to attend the Hajj.

This criminal complaint is based upon these facts:

X Continued on the attached sheet.

\_\_\_\_\_  
HEATHER A. CZUBAK

Special Agent, Federal Bureau of Investigation  
(FBI)

Sworn to before me and signed in my presence.

Date: December 17, 2014

\_\_\_\_\_  
*Judge's signature*

City and state: Chicago, Illinois

\_\_\_\_\_  
SHEILA FINNEGAN, U.S. Magistrate Judge

*Printed name and Title*

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS

ss

**AFFIDAVIT**

I, HEATHER A. CZUBAK, being duly sworn, state as follows:

1. I am a Special Agent with the Federal Bureau of Investigation, and have been so employed for six years. My current responsibilities include the investigation of white collar crime, including mail and wire fraud.

2. This affidavit is submitted in support of a criminal complaint alleging that Rashid Minhas has violated Title 18, United States Code, Section 1341. Because this affidavit is being submitted for the limited purpose of establishing probable cause in support of a criminal complaint charging Minhas with mail fraud, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause to believe that the defendant committed the offense alleged in the complaint.

3. This affidavit is based on my personal knowledge, information provided to me by other law enforcement agents and personnel (collectively, “agents”) and my review of documents and other information obtained in this investigation.

**OVERVIEW**

4. I submit that evidence, as set for the below, provides probable cause to believe that beginning no later than March 2014 and continuing until at least November 2014, Minhas engaged in a scheme to defraud the customers of his

company, Light Star Hajj Group, Inc. (“Light Star Hajj”), by falsely representing that packages for travel to the Hajj in September and October 2014 included the visa required to enter Saudi Arabia. In fact, Minhas knew that Light Star Hajj was not authorized by Saudi Arabia to obtain visas, and that he did not intend to obtain the required Hajj visas. Minhas fraudulently sold Hajj travel packages to at least approximately 50 customers, and collected approximately \$525,000, which he caused to be deposited into Light Star Hajj’s bank accounts. Minhas commingled the money he obtained from the sale of Hajj travel packages with other deposits. Bank records show that, in total, Minhas used the funds in the bank accounts to make partial refunds to customers that he defrauded, to transfer funds to Pakistan, and to pay personal expenses, among other things.

5. Throughout the time covered by the events in this Affidavit, Minhas has been on pre-trial release following indictment for having defrauded the customers of another travel agency that he owned. This affidavit is submitted in support of a warrant for Minhas’ arrest.

#### **MINHAS’ PENDING CRIMINAL CASE**

6. On November 21, 2013, Minhas was charged by indictment with seven counts of mail and wire fraud, in violation of Title 18, United States Code, Sections 1341 and 1343, in *United States v. Rashid Minhas*, No. 13 CR 919, now pending before Judge Feinerman.

7. The indictment charges that between October 2008 and March 2009 Minhas, then operating a travel agency called City Travel & Tours, sold

international airline tickets to his customers and collected payment for the tickets, knowing that he did not intend to pay for the tickets and that he intended to keep the proceeds for his own use and benefit. The indictment alleges that Minhas sold or caused to be sold at least approximately \$339,885 in airline tickets that he caused to be voided, resulting in losses to Emirates Airlines and others of at least approximately \$292,705.

8. On December 13, 2013, the FBI arrested Minhas pursuant to a warrant based on the indictment. That same day, Minhas was arraigned before Magistrate Judge Mason, and entered a plea of not guilty. On December 16, 2013, Minhas was released on a \$25,000 unsecured bond, and placed on home detention with location monitoring with his former wife as a third party custodian. Minhas was also required to surrender his passport. Minhas' case is set for trial on January 26, 2015.

### **The Hajj**

9. The Hajj is an annual Islamic pilgrimage to Mecca, Saudi Arabia. The Hajj is a mandatory religious duty for Muslims, and must be carried out at least once in a lifetime by all adult Muslims who are physically and financially capable of undertaking the journey. In 2014, the Hajj pilgrimage was from October 2, 2014 to October 7, 2014. Each year, approximately 2,000,000 pilgrims attend Hajj.

10. Pilgrims must hold a visa for Hajj for entry in Saudi Arabia to perform Hajj. The Saudi Arabian government has guidelines for issuing visas to enter Saudi Arabia for Hajj, which are publicly available on the website for the Royal Embassy

of Saudi Arabia in Washington, D.C. at [www.saudiembassy.net/services/hajj\\_requirements.aspx](http://www.saudiembassy.net/services/hajj_requirements.aspx). (“Saudi Embassy website”).

11. Pilgrims wishing to obtain a visa to travel to Saudi Arabia for Hajj must apply through certain U.S. travel agencies authorized by Saudi Arabia to handle Hajj visa applications. Each year, the Saudi Arabian government allots a certain number of visas to each authorized travel agency, referred to as the travel agency’s quota of Hajj visas for the year. Authorized travel agencies sell travel packages to Hajj pilgrims based on the number of visas they have been allotted. Hajj visas are free. Pilgrims generally purchase a Hajj travel package from an authorized travel agency in order to obtain the visa.

12. According to the Saudi Embassy website, pilgrims must possess certain documents to obtain a Hajj visa, including: (a) a completed visa application form signed and stamped by the authorized travel agency; and (b) a non-refundable roundtrip ticket with confirmed reservations.

### **SCHEME TO DEFRAUD**

#### **Light Star Hajj Group, Inc.**

13. According to the Illinois Secretary of State’s web site, Light Star Hajj Group, Inc.<sup>1</sup> was formed on February 20, 2013. Minhas is the president of Light Star Hajj, and its address is 5801 Northwest Highway, Chicago, Illinois.<sup>2</sup>

---

<sup>1</sup> Documents and information I have reviewed in this investigation show Light Star Hajj Group, Inc.’s name spelled various ways, including LightStar Hajj Group, Light-Star Hajj Group, and Light Star Hajj. Based on my review of documents, witness statements and other information, these various spellings refer to the same company operated by Minhas.

14. Light Star Hajj maintains a web site at [www.lighstarhajj.com](http://www.lighstarhajj.com). Light Star Hajj's website advertises travel packages for sale to attend the Hajj in Mecca, Saudi Arabia. According to [www.lightstarhajj.com](http://www.lightstarhajj.com), Light Star Hajj's street address is 5801 Northwest Highway, Chicago, Illinois 60631, the telephone number is (800) 260-4254 and the email address is [info@lightstarhajj.com](mailto:info@lightstarhajj.com).

15. Light Star Hajj's web site is hosted by GoDaddy.com, LLC. According to records obtained from GoDaddy.com, LLC for Light Star Hajj, [www.lightstarhajj.com](http://www.lightstarhajj.com) was created on January 13, 2014. The contact name for Light Star Hajj is Rashid. The telephone number for Light Star Hajj is (800) 260-4254, and the street address is 5801 Northwest Highway, Chicago, Illinois 60631. The email address for Light Star Hajj is [info@lightstarhajj.com](mailto:info@lightstarhajj.com).

16. Records obtained from U.S. Bank show that there two accounts at U.S. Bank in the name of Light Star Hajj, including an account with the last four digits ended 9465 ("9465 account"). According to records obtained from U.S. Bank, Minhas and his former wife are the authorized signers for the two accounts.

17. Based on my review of the Saudi Embassy web site and agents' interview of Travel Agent B, Light Star Hajj was not authorized by the Saudi Arabian government to submit visa applications to obtain Hajj visas.

### **Travel Agent A Purchased Hajj Travel Packages**

---

<sup>2</sup> According to the U.S. Postal Service, the address for Light Star Hajj is 5801 North Northwest Highway, Chicago, Illinois 60631. Based on my review of witness statements, documents, and my visit to Light Star Hajj's office on December 16, 2014, 5801 North Northwest Highway, Chicago, Illinois and 5801 Northwest Highway are the same place and are used interchangeably.

18. One of the victims interviewed by agents as part of this investigation is Travel Agent A. Travel Agent A owns Travel Agency A in Marietta, Georgia. Travel Agency A is not authorized by Saudi Arabia to obtain Hajj visas for its customers. According to Travel Agent A, he/she purchases Hajj travel packages, with visas, from other travel agencies for resale to his/her customers.

19. According to Travel Agent A, in early 2014, he/she had purchased packages for two of his/her customers to attend Umrah in Saudi Arabia. According to Travel Agent A, Umrah is a pilgrimage to Mecca, Saudi Arabia, performed by Muslims that can be undertaken at any time of the year.

20. According to Travel Agent A, between February and April 2014, after his/her customers had purchased the Umrah travel packages from Minhas, he/she traveled to Chicago, Illinois, to meet Minhas to learn more about Light Star Hajj's travel packages for Hajj. According to Travel Agent A, when he/she arrived in Chicago, he/she telephoned Minhas, and drove to Light Star Hajj's office at 5801 North Northwest Highway in Chicago. According to Travel Agent A, Minhas met him/her in front of the building. Travel Agent A recognized Minhas as having the same voice as the person he/she spoke to when he telephoned Minhas upon arriving in Chicago. According to Travel Agent A, Minhas led Travel Agent A in 5801 North Northwest Highway, and through the first floor to his office at the back left hand side of the first floor.

21. According to Travel Agent A, Minhas' office was a single room with a door and an attached bathroom. According to Travel Agent A, the walls of Light

Star Hajj were decorated with Light Star Hajj signs. The office contained a desk, chair, and filing cabinet. Travel Agent A observed a laptop computer on the desk. According to Travel Agent A, prior to meeting with Minhas in Chicago, he/she had sent Minhas information regarding his/her customers and their interest in Umrah travel packages. Travel Agent A observed Minhas remove files from the filing cabinet regarding his customers' travel. Travel Agent A also observed Minhas use the laptop computer to review information regarding Travel Agent A's customers' travel.

22. According to Travel Agent A, he/she discussed Light Star Travel's access to Hajj visas during his/her visit to Chicago between February and April 2014. According to Travel Agent A, it was important to his/her decision whether to purchase Hajj travel packages for his/her customers that the travel packages include the visa required to enter Saudi Arabia for Hajj. According to Travel Agent A, he/she wanted to ensure that Hajj travel packages he/she purchased for his/her customers included visas to enter Saudi Arabia. According to Travel Agent A, he/she asked Minhas whether Minhas expected any problems obtaining Hajj visas because Minhas had been slow to obtain visas for his/her customers to go to Umrah.

23. According to Travel Agent A, Minhas stated that the Hajj visas were a "done deal." According to Travel Agent A, Minhas stated that there would be no problem obtaining Hajj visas because the visas had been set aside in a quota. Minhas stated that he intended to take his own group to Hajj, and that he had obtained his own quota of 147 visas to use for his group. Minhas further stated that

he had sold or had customers interested in travel packages for approximately 90 of the visas. According to Travel Agent A, he/she would not have purchased Hajj travel packages from Light Star Travel if he/she known that Light Star Hajj did not have its own quota of visas that would be reserved for the packages that Travel Agent A purchased from Light Star Hajj for his/her customers.

24. According to Travel Agent A, he/she contacted Minhas by telephone at either (718) 710-0771 or (773) 807-8692. According to Travel Agent A, he/she spoke to Minhas at (718) 710-0771 or (773) 807-8692 for each of the conversations set out below. According to Travel Agent A, he/she recognized Minhas' voice when he/she called (718) 710-0771 or (773) 807-8692 as belonging to the same person he/she met at Light Star Hajj's offices between February and April 2014.

25. According to Travel Agent A, in late April or early May 2014, following his/her trip to Chicago, he/she telephoned Minhas to purchase Hajj travel packages for his/her customers. According to Travel Agent A, Minhas stated that he had several Hajj travel packages for sale. Package A was \$8,495 per person; Package B was approximately \$7,000; Package C cost \$5,995 per person; and Package D cost \$4,995 per person. The more expensive travel packages, such as Packages A and B, included better hotel and transportation accommodations than the lesser expensive travel packages, such as Packages C and D. All four packages included: round trip airfare to Jeddah, Saudi Arabia, or another city in Saudi Arabia; hotel and tent accommodations; and the visa process.

26. Minhas represented to Travel Agent A that Package A included airfare, accommodations, a Medina city tour, private transportation, one phone sim card, meals, certain ceremonial fees and the visa process. The accommodations included a five star hotel in Mecca for five nights, a four star hotel in Medina for nine nights, and North American tents in Mina for four days. According to Travel Agent A, Minhas' oral representations regarding the travel packages were consistent with the information on Light Star Hajj's web site.

27. According to Travel Agent A, in late April and May 2014, he/she purchased nine Hajj packages from Minhas for his/her customers. According to Travel Agent A, seven of his/her customers held U.S. passports and two of his/her customer held Pakistani passports. According to Travel Agent A, Minhas charged \$8,500 for six customers for a total of approximately \$51,000. Minhas charged a lesser price, \$7,720, for three customers for a total of approximately \$23,160, because the customers planned to travel for a shorter time period.

28. According to Travel Agent A, on or about April 30, 2014, he/she mailed a \$10,905 check to Light Star Hajj's offices at 5801 North Northwest Highway, Chicago, Illinois, as a down payment on the Hajj travel packages for three people. Bank records show that on or about May 2, 2014, the \$10,905 check was deposited into Light Star Hajj's 9465 account. According to Travel Agent A, in mid-May 2014, he/she received from Light Star Hajj a \$22,650 invoice dated May 7, 2014, for Hajj packages for three people, which reflected the \$10,905 payment.

29. According to Travel Agent A, on or about May 29, 2014, he/she mailed a \$12,000 check to Light Star Hajj's offices at 5801 North Northwest Highway, Chicago, Illinois, as a down payment on Hajj packages for six people. Account statements from U.S. Bank show that Travel Agent A's \$12,000 check was deposited into the 9465 account on or about May 30, 2014. According to Travel Agent A, in early June 2014, he/she received from Light Star Hajj a \$51,420 invoice for Hajj travel packages for six people, which reflected the \$12,000 payment.

30. In August 2014, Travel Agent A sent the balance due for the Hajj packages to Light Star Hajj. On or about August 4, 2014, Travel Agent A mailed checks for \$11,265 and \$26,000 payable to Light Star Hajj for seven customers by placing them at the post office in Marietta, Georgia, for delivery by priority mail express to "Rashid Light Star Hajj 5801 Northwest Hwy, Chicago, IL 60631." Travel Agent A has provided agents with a copy of the U.S. Postal Service priority mail express label for the August 4, 2014, mailing, which is the charged mailing in this complaint. On August 15, 2014, Travel Agent A mailed a \$13,000 check payable to Light Star Hajj's offices at 5801 North Northwest Highway to pay for two customers.

31. Account statements from U.S. Bank show that Travel Agent A's checks were deposited into Light Star Hajj's 9465 account. Travel Agent's A's \$11,265 and \$26,000 checks were deposited on or about August 6, 2014. Travel Agent A's \$13,000 check was deposited into Light Star Hajj's 9465 account at U.S. Bank on August 15, 2014.

32. According to Travel Agent A, in or about early August 2014, he/she mailed Minhas his/her customers' passports in order to have the passports processed for the Hajj visas. According to Travel Agent A, in early September 2014, he/she telephoned Minhas to find out the status of the visas and to obtain the airline tickets for his/her customers. According to Travel Agent A, Minhas told him/her that he would email Travel Agent A the airline reservations for his/her customers.

33. On or about September 11, 2014, Travel Agent A received an email from info@lightstarhajj.com. In the email body was a link that upon clicking provided airline reservation information for six of Travel Agent A's customers had reservations to fly on Lufthansa Airlines to Saudi Arabia. The reservations showed that the passengers were scheduled to depart on or about September 20, 2014, or September 23, 2014, depending on the length of their trip. According to Travel Agent A, the Saudi Arabian Embassy required that pilgrims hold issued tickets in order to process their visa applications.

34. According to Travel Agent A, on or about September 11, 2014, or shortly thereafter, he/she called Minhas to find out why Minhas had not issued tickets to his/her customers flying on Lufthansa. According to Travel Agent A, he/she told Minhas that he could not wait until the last minute to purchase airline tickets because his/her customers needed to plan when to leave and when they would return. Travel Agent A also reminded Minhas that the Saudi Arabian Embassy required that individuals applying for Hajj visas to have non-refundable

round trip tickets with confirmed reservations to process their Hajj visas. According to Travel Agent A, Minhas stated it took little time to issue the tickets, and that he did not intend to issue the tickets until the Saudi Arabian Embassy was ready to process the passports for Hajj visas.

35. According to Travel Agent A, on or about September 14, 2014, at approximately 8:42 pm, he/she received an email from info@lightstarhajj.com. The email was titled "Hajj Tour Update," and stated, in relevant part:

We submit your Passport for Hajj Visa. We hope we are getting back by 16/17/18-September depend, if not any error, and we will mail you Immediately.

\*\*\*

For any inquiry – please email any time, we are busy in Washington for Hajj visa Process.

Thanks & Best Regards.

Rashid

36. According to Travel Agent A, he/she telephoned Minhas daily after September 14, 2014, for an update regarding when the visas would be issued. According to Travel Agent A, on or about September 15, 2014, or September 16, 2014, during one of their telephone calls, Minhas stated that he was working with Travel Agency B. Minhas stated that Travel Agency B was obtaining the visas for Travel Agent A's customers from the Saudi Arabian Embassy. Minhas stated that Travel Agency B was located in Virginia.

37. According to Travel Agent A, he/she found Travel Agency B in Falls Church, Virginia. On or about September 17, 2014, Travel Agent A telephoned

Travel Agency B. According to Travel Agent A, he/she spoke to Travel Agent B. According to Travel Agent A, Travel Agent B stated that he/she had received a package from Minhas containing approximately 90 passports.

38. On or about September 18, 2014, at or about 7:34 pm, Travel Agent A received an email from Travel Agent B. Travel Agent A has provided agents with a copy of the email. The email states that “[H]e [referring to Minhas] has taken all passports from our office.” According to Travel Agent A, he/she telephoned Travel Agent B. According to Travel Agent A, Travel Agent B stated that Minhas’ former wife had come to Travel Agent B’s offices and taken back the passports that Minhas had sent to Travel Agency B.

#### **Agents Interview with Travel Agent B**

39. Agents have interviewed Travel Agent B. Travel Agent B owns Travel Agency B in Falls Church, Virginia. Travel Agency B is authorized by the Saudi Arabian government to process Hajj visas. According to Travel Agent B, the Saudi Arabian government allotted Travel Agency B 130 visas for 2014.

40. According to Travel Agent B, he/she has known Minhas since approximately 2009, when Minhas came to his/her office in Falls Church, Virginia. According to Travel Agent B, following the conclusion of Ramadan on July 28, 2014, Minhas contacted him/her by telephone regarding 2014 Hajj travel packages with visas. According to Travel Agent B, he/she recognized Minhas’ voice based on their prior in person meeting. According to Travel Agent B, Minhas offered to purchase

Hajj travel packages with visas from Travel Agency B, but Minhas' offer was less than the price Travel Agent B paid for the packages.

41. According to Travel Agent B, he/she had sold Hajj travel packages for all 130 visas by the end of August 2014. According to Travel Agent B, Minhas did not purchase any travel packages for Hajj for 2014, and did not obtain any Hajj visas from Travel Agency B.

42. According to Travel Agent B, in prior years, Saudi Arabia had issued guest visas, referred to as mujamala, to pilgrims who had not obtained a Hajj visa. According to Travel Agent B, beginning on or about August 31, 2014, he/she exchanged text messages with Minhas at telephone number (773) 807-8692 regarding the availability of mujamala visas. According to Travel Agent B, Minhas told Travel Agent B to contact him at (773) 807-8692.

43. Travel Agent B has provided agents with copies of text messages that he/she exchanged with Minhas regarding mujamala visas. Based on my review of the text messages, Minhas did not purchase any travel packages for Hajj from Travel Agency B, or cause any passports to be submitted to the Saudi Consulate for Travel Agent A's customers or any other customer of Light Star Hajj to obtain a mujamala visa.

44. On or about August 31, 2014, at 10:35 pm, Minhas and Travel Agent B exchanged the following text messages:

Minhas: Hazoor. What is the position in the hajj market.

Travel Agent B: Good, so far, regular visas are finished, mujamala start tue [meaning, Tuesday].

45. On or about September 4, 2014, at 7:17 pm, Minhas and Travel Agent B exchanged the following text messages regarding mujamala visas:

Travel Agent B: might get confirmation tomorrow, give me your best offer with and without services.

Minhas: \$1000 normal. \$1350 with service. 100 totals.

Travel Agent B: That is less than my buying price.

46. On or about September 6, 2014, at approximately 12:21 pm, Minhas sent a text message to Travel Agent B stating, "100k check mailed with 89 pspt [passports]. . . Balance will wire to u once all done visas."

47. On or about September 8, 2014, at 1:20 pm, Minhas sent a text message to Travel Agent B, stating "\$112200 has been wired. Please check email and confirm account information." Statements from U.S. Bank for Light Star Hajj's 9465 account show that \$112,200 was wired to Travel Agency B's bank account on September 8, 2014. According to Travel Agent B, on or about September 7 or September 8, 2014, Minhas' former wife brought a package containing approximately 90 passports to Travel Agency B's offices.

48. According to Travel Agent B, he/she did not obtain any mujamala visas in September 2014 or thereafter for 2014 Hajj. According to Travel Agent B, on or about September 18, 2014, Minhas instructed him/her by text message to wire the \$112,200 back to Light Star Hajj's 9465 account at U.S. Bank. As part of the text message, Minhas identified his address as "5801. N. northwest Highway Chicago il - 60631".

49. On or about September 18, 2014, at approximately 6:10 pm, Minhas and Travel Agent B exchanged the following text messages:

Travel Agent B: Did you find visa?

Minhas: No.

50. On or about September 18, 2014, at approximately 7:02 pm, Minhas sent a text message to Travel Agent B, stating, "Returning money To customers". Account statement for Light Star Hajj's 9465 account at U.S. Bank shows that \$112,200 was wired from Travel Agency B's bank account to Light Star Hajj's 9465 account on September 19, 2014. According to Travel Agent B, on or about September 19, 2014, Minhas' former wife came to Travel Agent B's office, and took back the passports she had previously brought to Travel Agency B's offices.

**Travel Agent A's Communications  
with Minhas On and After September 18, 2014**

51. According to Travel Agent A, on or about September 18, 2014, he/she telephoned Minhas. Travel Agent A asked Minhas why Minhas' former wife had picked up passports from Travel Agent B. According to Travel Agent A, Minhas stated that Travel Agent B was "kidding" with Travel Agent A, and that Travel Agent A's customers' passport were still with Travel Agent B. Travel Agent A told Minhas that he/she did not believe that the passports were still at Travel Agency B. Minhas told Travel Agent A that the passports had been submitted to the Saudi Arabian Embassy to be processed for the Hajj visas.

52. According to Travel Agent A, following September 18, he/she telephoned Minhas each day to find out the status of the visas because his/her

customers were scheduled to depart beginning on September 20, 2014. According to Travel Agent A, Minhas repeatedly told him/her that the passports were at the Embassy to be processed for visas.

53. According to Travel Agent A, on or about September 24, 2014, he/she received an email from info@lightstar hajj.com, stating that visas would not be granted:

We are sorry to inform you that The Saudi Consulate could not grant your Hajj Visa. We tried our best. They said there was some problems in the computer for scanning passports in the system. They issued some Hajj visas for our customers, and other but not for everyone.

We understand how your Heart is feeling, **But If Allah doesn't want to invite you**, than no one can take you to Mecca/Medina.

\*\*\*

Thanks & Best Regard.

Rashid

(Emphasis in original).

54. According to Travel Agent A, on or about September 24, 2014, after having received the email, he/she telephoned Minhas. According to Travel Agent A, Minhas stated that he had sent the email stating that the Saudi Consulate could not grant the visas because people had been bothering him regarding the visas. Minhas stated that there was still time to obtain visas, and that he had not pulled the passports from the Embassy. Minhas stated that the next day was a holiday in Saudi Arabia, and that he would know more information on September 26.

55. According to Travel Agent A, on or about September 26, 2014, he/she telephoned Minhas. According to Travel Agent A, Minhas stated that “it was done,” and that the Saudi Arabian Embassy in Washington, D.C. had declined the visas. Minhas stated that he was in Chicago, and getting ready to go travel to Saudi Arabia the following week to attend Hajj. Minhas stated would return the passports to Travel Agent A. Travel Agent A asked Minhas how he could have the passports in Chicago when the passports were supposed to be at the Saudi Embassy in Washington, D.C. According to Travel Agent A, on or about September 27, 2014, he/she received his/her customers’ passports, which had been sent on September 26, 2014 from Light Star Hajj’s offices at 5801 North Northwest Highway in Chicago.

56. According to Travel Agent A, on or about September 29, 2014, Minhas called him/her from a telephone number with Saudi Arabia’s country code of 966. According to Travel Agent A, Minhas stated that he was in Saudi Arabia for Hajj, and that he would contact Travel Agent A when he returned. According to Travel Agent A, he/she asked Minhas to refund his customers’ money. Minhas stated that he could refund approximately \$2,500 to \$3,000 per person, but that he had spent the rest of the money on hotels and other travel arrangements for customers and that the customers would have to wait until he received the money back. According to Travel Agent A, his/her customers have not yet received any of their money back from Minhas.

57. Based on information obtained from law enforcement databases, Minhas has not left the United States in 2014.

### **Bank Account Analysis**

58. Based on agents' review of Light Star Hajj's U.S. Bank records, from March 1, 2014, to November 30, 2014, approximately \$525,000 was deposited into the accounts from the sale of Hajj travel packages. In addition, bank records show that approximately \$586,000 was deposited into the accounts from other sources, including the sale of Umrah travel packages, cash deposits, and transfers from other sources.

59. Based on agents' review of Light Star Hajj's U.S. Bank records, approximately \$745,000 was spent on expenditures that do not appear to be related to Hajj travel packages. These include approximately \$159,000 in checks to cash, approximately \$339,000 in transfers to an individual in Pakistan, approximately \$49,000 in checks to Minhas' former wife, approximately \$77,000 in checks to various individuals some of which appear to be partial refunds for Hajj travel packages, \$25,000 to a door construction company, and various other expenses less than \$10,000, including approximately \$2,000 for Disney World's Magic Kingdom. Based on agents' review of bank records, Light Star Travel did not purchase any travel packages from any travel agencies in order to provide its customers with the Hajj visas that Minhas represented to Light Star Hajj's customers were included with travel packages.

### **5801 North Northwest Highway, Chicago, Illinois**

60. On December 16, 2014, I went to the Light Star Hajj's office at 5801 North Northwest Highway, Chicago, Illinois. 5801 North Northwest Highway is a

two story brick building at the northeast corner of North Northwest Highway and North Napoleon Avenue in Chicago. The entrance to the 5801 North Northwest Highway is on North Northwest Highway, and is marked with 5801 above the door. There is a sign for Light Star Hajj on the front door of 5801 North Northwest Highway, and there are Light Star Hajj signs on the windows of the building. Hanging over the door is a sign for a real estate company.

61. According to Travel Agent A, between February and April 2014, Travel Agent A visited Light Star Hajj's offices at 5801 North Northwest Highway. According to Travel Agent A, the first floor of 5801 North Northwest Highway is a real estate office and Minhas has an office at the back of the real estate office. According to Travel Agent A, Minhas took him/her into an office at the back left hand side of the building.

62. According to Individual A, in or about August 2014, Minhas took him/her to Minhas' office at 5801 North Northwest Highway, Chicago, Illinois. Individual A has told agents, as part of this investigation, that Minhas' office was in the back of the real estate office on the first floor of the building. Individual A has told agents that the office contained a desk and a shelf, and that Minhas had a computer on the desk. According to Individual A, Minhas showed him/her checks for Light Star Hajj travel packages when he/she was at Minhas' office.

63. Postal Carrier A is a mail carrier for the U.S. Postal Service. According to Postal Carrier A, he/she has delivered the U.S. mail to 5801 North Northwest Highway, Chicago, Illinois since early 2014. Postal Carrier A described 5801 North

Northwest Highway as an open office with desks, and stated that Light Star Hajj occupies a separate small office at the back of the office space. Postal Carrier A stated that the door to the office for Light Star Hajj Group has a sign clearly marking the business. During my visit to 5801 North Northwest Highway on December 16, 2014, I observed by looking through the front window that there were two doors at the rear of the office space. I observed that the door on the left side had a Light Star Hajj sign attached to it.

64. According to Postal Carrier A, Light Star Hajj Group and Minhas receive mail at 5801 North Northwest Highway. Postal Carrier A has observed Minhas working on a computer in the Light Star Hajj's office. According to Postal Carrier A, Minhas met him/her at the door to Light Star Hajj's office when he/she delivered mail.

65. According to Postal Carrier A, he/she delivered at least six Express and Priority mail packages to Light Star Hajj's office in the summer of 2014. More recently, on or about November 29, 2014, Postal Carrier A delivered a priority mail express package sent from Norman, Oklahoma to "Light Star Hajj Group, Attn: Mr. Rashid Minhas" at 5801 North Northwest Highway. On or about December 9, 2014, Postal Carrier A delivered a priority mail express package sent from Doraville, Georgia to "Rashid Light Star Hajj Group" at 5801 North Northwest Highway.

### **CONCLUSION**

66. Based on the foregoing, I believe there is probable cause to believe that beginning no later than March 2014 and continuing through at least November

2014, Rashid Minhas knowingly devised and intended to devise a scheme to defraud, and to obtain money from the customers of Light Star Hajj Group, Inc., by means of false and fraudulent pretenses, representations and promises, and material omissions, and that for the purpose of executing the scheme to defraud, on or about August 4, 2014, defendant Rashid Minhas, for the purpose of executing a scheme to defraud, knowingly caused to be delivered by the United States Postal Service to 5801 North Northwest Highway, Chicago, Illinois, a priority mail express package addressed to “Rashid Light Star Hajj 5801 Northwest Highway, Chicago, IL 60631” containing payment for travel packages purchased by Travel Agent A’s customers to attend the Hajj.

FURTHER AFFIANT SAYETH NOT.

---

HEATHER A. CZUBAK  
Special Agent, Federal Bureau of  
Investigation

SUBSCRIBED AND SWORN to before me on December 17, 2014.

---

SHEILA FINNEGAN  
United States Magistrate Judge