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F. #2019R01109

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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

LONG ISLAND OFFICE

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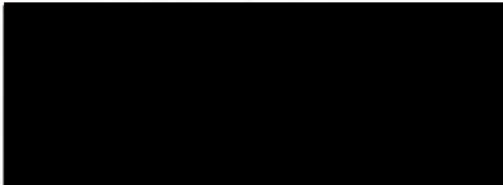
UNITED STATES OF AMERICA

INDICTMENT

- against -

Cr. No. **CR 22 494**

(T. 18, U.S.C. §§ 981(a)(1)(C), 1594(c),
1594(d), 1952(a)(1)(A), 1952(b)(1), 2
and 3551 et seq.; T. 21, U.S.C. §§
856(a)(2), 853(a) and 853(p); T. 28,
U.S.C. § 2461(c))



SEYBERT, J.

JIGAR DADARWALA,
also known as "Cobra,"
NARENDARAKUMA DADARWALA,
also known as "Naren," "Pa" and "Dad,"
SHARDABEN DADARWALA,
also known as "Sharda," "Ma" and
"Mom,"
ASHOKBHAI PATEL,
also known as "BG" and
HIMANSHU, INC.,

LINDSAY, M.J.

Defendants.

-----X

THE GRAND JURY CHARGES:

COUNT ONE
(Sex Trafficking Conspiracy)

1. In or about and between 2014 and the date of this Indictment, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants

JIGAR DADARWALA, also known as "Cobra,"
NARENDARAKUMA DADARWALA, also known as "Naren," "Pa" and "Dad,"
SHARDABEN DADARWALA, also known as "Sharda," "Ma" and "Mom," ASHOKBHAI

PATEL, also known as “BG” and HIMANSHU, INC., together with others, did knowingly and intentionally conspire to recruit, entice, harbor, transport, provide, obtain and maintain by any means one or more persons, in and affecting interstate and foreign commerce, and to benefit, financially and by receiving anything of value, from participation in a venture that engaged in such acts, knowing, and in reckless disregard of the fact, that (1) means of force, threats of force, fraud, coercion and a combination of such means would be used to cause such persons to engage in one or more commercial sex acts, and (2) one or more such persons had not attained the age of 18 years and would be caused to engage in one or more commercial sex acts, which offense was to be effected by force, fraud, coercion and a combination such means, contrary to Title 18, United States Code, Sections 1591(a)(1) and 1591(a)(2).

(Title 18, United States Code, Sections 1594(c) and 3551 et seq.)

COUNT TWO
(Managing a Drug Premises)

2. In or about and between 2014 and the date of this Indictment, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants JIGAR DADARWALA, also known as “Cobra,” NARENDARAKUMA DADARWALA, also known as “Naren,” “Pa” and “Dad,” SHARDABEN DADARWALA, also known as “Sharda,” “Ma” and “Mom,” ASHOKBHAI PATEL, also known as “BG” and HIMANSHU, INC., together with others, did knowingly and intentionally own, manage and control a place, to wit: a motel located in Sayville, New York, as an owner, agent, employee and occupant, and did knowingly and intentionally rent, lease, profit from and make available for use said place for the purpose of unlawfully manufacturing, storing, distributing and using one or more controlled substances, to wit: a substance containing cocaine base, a Schedule II controlled

substance, a substance containing cocaine, a Schedule II controlled substance and a substance containing heroin, a Schedule I controlled substance.

(Title 21, United States Code, Section 856(a)(2); Title 18, United States Code, Sections 2 and 3551 et seq.)

COUNT THREE

(Distribution of Proceeds of Prostitution and Narcotics Businesses)

3. In or about and between 2014 and the date of this Indictment, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant NARENDARAKUMA DADARWALA, also known as “Naren,” “Pa” and “Dad,” together with others, did knowingly and intentionally use, and cause to be used, one or more facilities in interstate commerce, to wit: one or more wire transfer services, with intent to distribute the proceeds of unlawful activities, to wit: a business enterprise involving prostitution offenses in violation of the laws of the State of New York and of the United States and a business enterprise involving narcotics, and thereafter did knowingly and intentionally perform, attempt to perform and cause to be performed an act to distribute the proceeds of such unlawful activity.

(Title 18, United States Code, Sections 1952(a)(1)(A), 1952(b)(1), 2 and 3551 et seq.)

CRIMINAL FORFEITURE ALLEGATION
AS TO COUNT ONE

4. The United States hereby gives notice to the defendants charged in Count One that, upon their conviction of such offense, the government will seek forfeiture in accordance with Title 18, United States Code, Section 1594(d), of (a) any property, real or personal, that was involved in, used, or intended to be used to commit or to facilitate the

commission of such offense, and any property traceable to such property; and (b) any property, real or personal, constituting, or derived from, proceeds obtained directly or indirectly as a result of such offense, or any property traceable to such property, including but not limited to the real property and premises located at 5494 Sunrise Highway, Sayville, New York 11782, and all proceeds traceable thereto.

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 party;
- (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 divided

without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendants up to the value of the forfeitable property described in this forfeiture allegation.

(Title 18, United States Code, Section 1594(d); Title 21, United States Code, Section 853(p))

CRIMINAL FORFEITURE ALLEGATION
AS TO COUNT TWO

6. The United States hereby gives notice to the defendants charged in Count Two that, upon their conviction of such offense, the government will seek forfeiture in accordance with Title 21, United States Code, Section 853(a), which requires any person convicted of such offense to forfeit: (a) any property constituting, or derived from, any proceeds

obtained directly or indirectly as the result of such offense; and (b) any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such offense, including but not limited to the real property and premises located at 5494 Sunrise Highway, Sayville, New York 11782, and all proceeds traceable thereto.

7. 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 party;
- (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 divided

without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendants up to the value of the forfeitable property described in this forfeiture allegation.

(Title 21, United States Code, Sections 853(a) and 853(p))

CRIMINAL FORFEITURE ALLEGATION
AS TO COUNT THREE

8. The United States hereby gives notice to the defendant charged in Count Three that, upon his conviction of such offense, the government will seek forfeiture in accordance with Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), which require any person convicted of such offense to forfeit any property, real or personal, constituting, or derived from, proceeds obtained directly or indirectly as a result of such offense.

9. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (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 divided

without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described in this forfeiture allegation.

(Title 18, United States Code, Section 981(a)(1)(C); Title 21, United States Code, Section 853(p); Title 28, United States Code, Section 2461(c))

A TRUE BILL

[REDACTED]
FOREPERSON

[REDACTED]


BREON PEACE
UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK

No.

UNITED STATES DISTRICT COURT
EASTERN *District of* NEW YORK
CRIMINAL DIVISION

THE UNITED STATES OF AMERICA


vs.

 JIGAR DADARWALA, also known as "Cobra,"
NARENDARAKUMA DADARWALA, also known as "Naren," "Pa" and "Dad,"
SHARDABEN DADARWALA, also known as "Sharda," "Ma" and "Mom,"
ASHOKBHAI PATEL, also known as "BG" and HIMANSHU, INC.,
Defendant(s).

INDICTMENT

(T. 18, U.S.C. §§ 981(a)(1)(C), 1594(c), 1594(d), 1952(a)(1)(A), 1952(b)(1), 2
and 3551 et seq.; T. 21, U.S.C. § 856(a)(2), 853(a), 853(p); T. 28, U.S.C.
§ 2461(c))

A true



Foreperson

Filed in open court this _____ *day,*
of _____ *A.D. 20* _____

Clerk

Bail, \$ _____

Samantha Alessi & Catherine M. Mirabile, Assistant U.S. Attorneys