

RECEIVED  
IN CLERK'S OFFICE  
U.S. DISTRICT COURT E.D.N.Y.

★ JUN 05 2024 ★

MRM:AT  
F. #2022R00047

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK  
----- X

LONG ISLAND OFFICE

UNITED STATES OF AMERICA

INDICTMENT **CR24 231**

- against -

Cr. No. \_\_\_\_\_  
(T. 18, U.S.C., §§ 371, 982(a)(1),  
982(a)(7), 982(b)(1), 1347, 1349,  
1956(h), 2 and 3551 et seq.;  
T. 21, U.S.C., § 853(p);  
T. 42, U.S.C., § 1320a-7(b)(2)(B))

NOMAN AHMED,  
ADNAN ARSHAD,  
    also known as "Eddie,"  
REHMAN DIWAN,  
JESSICA HENDRICKSON,  
JOSE MARTE,  
MOHAMMED SALEEM,  
FAISAL SHAMSI,  
    also known as "Jimmy," and  
WAQAS SHAMSI,  
    also known as "Ricky,"

**AZRACK, J.**

**SHIELDS, M.J.**

Defendants.

----- X

THE GRAND JURY CHARGES:

INTRODUCTION

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

I. The Medicaid Program

1. The New York State Medicaid program ("Medicaid") was a federal and state health care program providing benefits to individuals and families who met specified financial and other eligibility requirements, and certain other individuals who lacked adequate resources to pay for medical care. The Centers for Medicare & Medicaid Services ("CMS"), a federal agency under the U.S. Department of Health and Human Services ("HHS"), was

4000

1980

CB 54 531

1980

1980

1980

responsible for overseeing the Medicaid program in participating states, including New York. Individuals who received benefits under Medicaid were referred to as “beneficiaries.”

2. Medicaid covered the costs of various medical services and products ranging from routine preventive medical care for children to institutional care for the elderly and disabled. Among the specific medical services provided by Medicaid were ambulette services, which provided beneficiaries with transportation to access medical care in non-emergency situations, including medical appointments.

3. To bill Medicaid, providers were required regularly to certify, among other things, that the claimed services were provided in accordance with applicable federal and state laws and regulations, and that the provider understood that payment of the claims were from federal, state and local public funds.

4. Medical providers and suppliers were authorized to submit claims to Medicaid only for services that were medically necessary, were provided by an authorized provider and were not induced by payment of a kickback, among other requirements.

5. As with other Medicaid providers, to submit claims for reimbursement to Medicaid, ambulette companies were required to apply for enrollment, to be enrolled and to periodically revalidate that enrollment.

6. The Medicaid program was a “health care benefit program,” as defined by Title 18, United States Code, Section 24(b), and a “Federal health care program,” as defined by Title 42, United States Code, Section 1320a-7b(f).

## II. The Defendants and Relevant Entities

7. Addiction Treatment Center-1, an entity the identity of which is known to the Grand Jury, was an addiction treatment center that assisted patients, included Medicaid beneficiaries, in New York, New York.

8. Addiction Treatment Center-2, an entity the identity of which is known to the Grand Jury, was an addiction treatment center that assisted patients, included Medicaid beneficiaries, in New York, New York.

9. Addiction Treatment Center-3, an entity the identity of which is known to the Grand Jury, was an addiction treatment center that assisted patients, included Medicaid beneficiaries, in New York, New York (together with Addiction Treatment Center-1 and Addiction Treatment Center-2, the "Addiction Treatment Centers").

10. 668 MTK Taxi LLC ("MTK") was a New York State Limited Liability Company located at 19 S Edison Ext., Montauk, New York 11954.

11. All-Star Taxi LLC ("All-Star") was a New York State Limited Liability Company located at 825 South 2nd Street, Ronkonkoma, New York 11779.

12. Apollo Transportation ("Apollo") was a New York State Company located at 1285 Montauk Highway Suite 206, Copiague, New York 11726.

13. Sunrise Taxi LLC ("Sunrise") was a New York State Limited Liability Company located at 97 Central Avenue, Patchogue, New York 11722.

14. Transportation Solution NY Corp. d/b/a A1 Transport ("A1," and together with MTK, All-Star, Apollo and Sunrise the "Defendant Transportation Companies")

15. The defendant NOMAN AHMED was a resident of Ronkonkoma, New York and was an employee of MTK and Apollo.

16. The defendant ADNAN ARSHAD, also known as "Eddie," was a resident of Mount Sinai, New York, was the owner of MTK and was part owner of All-Star Taxi.

17. The defendant REHMAN DIWAN was a resident of Hicksville, New York and was an employee of MTK, All-Star and Apollo.



18. The defendant JESSICA HENDRICKSON was a resident of Patchogue, New York, was an owner of Sunrise and was an employee of MTK.

19. The defendant JOSE MARTE was a resident of the Bronx, New York and was an employee of MTK.

20. The defendant MOHAMMED SALEEM was a resident of Hicksville, New York, was part owner of All-Star Taxi and was owner of Apollo.

21. The defendant FAISAL SHAMSI, also known as “Jimmy,” was a resident of Shirley, New York, was an owner of A1 and was an employee of MTK, All-Star and Apollo.

22. The defendant WAQAS SHAMSI, also known as “Ricky,” was a resident of Massapequa, New York and was an employee of MTK, Apollo and A1.

23. Coconspirator-1 (“CC-1”), Coconspirator-2 (“CC-2”), Coconspirator-3 (“CC-3”), Coconspirator-4 (“CC-4”), Coconspirator-5 (“CC-5”), Coconspirator-6 (“CC-6”), Coconspirator-7 (“CC-7”), Coconspirator-8 (“CC-8”), Coconspirator-9 (“CC-9”) and Coconspirator-10 (“CC-10”), individuals whose identities are known to the Grand Jury, were Medicaid beneficiaries.

### III. The Medicaid Fraud and Kickback Schemes

24. Between approximately December 2020 and March 2024, the defendants NOMAN AHMED, ADNAN ARSHAD, REHMAN DIWAN, JESSICA HENDRICKSON, JOSE MARTE, MOHAMMED SALEEM, FAISAL SHAMSI and WAQAS SHAMSI, together with others, agreed to execute and executed schemes to enrich themselves whereby they offered and paid illegal health care kickbacks and submitted and caused to be submitted claims to Medicaid for ambulette services to medical appointments, even though those ambulette services were not performed. In total, the defendants, through the Defendant Transportation Companies, fraudulently billed Medicaid millions of dollars.

25. The defendants NOMAN AHMED, ADNAN ARSHAD, REHMAN DIWAN, JESSICA HENDRICKSON, JOSE MARTE, MOHAMMED SALEEM, FAISAL SHAMSI and WAQAS SHAMSI, together with others:

(a) submitted fraudulent claims to Medicaid for transportation services that the Defendant Transportation Companies did not perform;

(b) submitted claims to Medicaid for transportation services that were induced by remuneration to beneficiaries;

(c) submitted fraudulent claims to Medicaid for transportation services whose costs were artificially inflated; and

(d) while receiving reimbursements for transportation services from Medicaid, some of which were never performed at all, paid kickbacks directly to beneficiaries for requesting those transportation services from the Defendant Transportation Companies.

26. As part of their scheme to submit claims to Medicaid for transportation services that the Defendant Transportation Companies did not perform, the defendants NOMAN AHMED, ADNAN ARSHAD, REHMAN DIWAN, JESSICA HENDRICKSON, JOSE MARTE, MOHAMMED SALEEM, FAISAL SHAMSI and WAQAS SHAMSI, together with others, submitted claims to Medicaid for transporting individuals to the Addiction Treatment Centers despite the fact that, at the time of the alleged transportation services,

(a) some of the individuals for whom claims were submitted were deceased, including Deceased Individual-1 and Deceased Individual-2, individuals whose identities are known to the Grand Jury;

(b) some of those individuals were hospitalized, including CC-1;

(c) some of those individuals were incarcerated, including CC-2.

27. The defendants also submitted claims to Medicaid for transporting the defendant JESSICA HENDRICKSON to Addiction Treatment Center-1 despite the fact that, at the time of the alleged transportation services, HENDRICKSON did not require any treatment, was not transported and was working for the Defendant Transportation Companies.

28. The defendants also submitted claims to Medicaid for transporting undercover law enforcement officers, who were acting as Medicaid beneficiaries, to the Addiction Treatment Centers. The undercover officers were in fact never transported to the Addiction Treatment Centers and never received treatment.

29. As part of their scheme to submit claims to Medicaid for transportation services whose costs were artificially inflated, the defendants NOMAN AHMED, ADNAN ARSHAD, REHMAN DIWAN, JESSICA HENDRICKSON, JOSE MARTE, MOHAMMED SALEEM, FAISAL SHAMSI and WAQAS SHAMSI, together with others, instructed Medicaid beneficiaries to list false home addresses (the pickup addresses) as the addresses for which they were purportedly to be picked up. The defendants instructed the beneficiaries to list false addresses which were further away from the Addiction Treatment Centers than their true home addresses so that the rides would be longer distances, and therefore the reimbursement rates would be higher. The defendants also instructed Medicaid beneficiaries to request treatment at the Addiction Treatment Centers, despite the Addiction Treatment Centers locations in New York City, and there were many other addiction treatment centers much closer to the Medicaid beneficiaries that lived on Long Island.

30. As part of their scheme to pay kickbacks directly to the beneficiaries for requesting those transportation services from the Defendant Transportation Companies, the defendants NOMAN AHMED, ADNAN ARSHAD, REHMAN DIWAN, JESSICA

HENDRICKSON, JOSE MARTE, MOHAMMED SALEEM, FAISAL SHAMSI and WAQAS SHAMSI, together with others, regularly and consistently made cash and electronic kickback payments to Medicaid beneficiaries so that those beneficiaries would request transportation services from the Defendant Transportation Companies.

COUNT ONE  
(Conspiracy to Commit Health Care Fraud)

31. The allegations contained in paragraphs one through 30 are realleged and incorporated as if fully set forth in this paragraph.

32. In or about and between December 2020 and March 2024, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants NOMAN AHMED, ADNAN ARSHAD, also known as “Eddie,” REHMAN DIWAN, JESSICA HENDRICKSON, JOSE MARTE, MOHAMMED SALEEM, FAISAL SHAMSI, also known as “Jimmy,” and WAQAS SHAMSI, also known as “Ricky,” together with others, did knowingly and willfully conspire to execute a scheme and artifice to defraud one or more health care benefit programs, as defined in Title 18, United States Code, Section 24(b), to wit: Medicaid, and to obtain, by means of one or more materially false and fraudulent pretenses, representations and promises, money and property owned by, and under the custody and control of Medicaid, in connection with the delivery of a payment for health care benefits, items and services, contrary to Title 18, United States Code, Section 1347.

(Title 18, United States Code, Sections 1349 and 3551 et seq.)

COUNTS TWO THROUGH SIX  
(Health Care Fraud)

33. The allegations contained in paragraphs one through 30 are realleged and incorporated as if fully set forth in this paragraph.

34. In or about and between December 2020 and March 2024, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants NOMAN AHMED, ADNAN ARSHAD, also known as “Eddie,” REHMAN DIWAN, JESSICA HENDRICKSON, JOSE MARTE, MOHAMMED SALEEM, FAISAL SHAMSI, also known as “Jimmy,” and WAQAS SHAMSI, also known as “Ricky,” together with others, did knowingly and willfully execute and attempt to execute a scheme and artifice to defraud one or more health care benefit programs, as defined in Title 18, United States Code, Section 24(b), to wit: Medicaid, and to obtain, by means of one or more materially false and fraudulent pretenses, representations and promises, money and property owned by, and under the custody and control of, Medicaid, in connection with submitting fraudulent claims for payment for Medicaid related to transportation services.

35. On or about the dates specified below, within the Eastern District of New York and elsewhere, the defendants NOMAN AHMED, ADNAN ARSHAD, also known as “Eddie,” REHMAN DIWAN, JESSICA HENDRICKSON, JOSE MARTE, MOHAMMED SALEEM, FAISAL SHAMSI, also known as “Jimmy,” and WAQAS SHAMSI, also known as “Ricky,” together with others, submitted and caused to be submitted the following false and fraudulent claims to Medicaid, in an attempt to execute, and in execution of the scheme described above:

Count	Medicaid Beneficiary	Transportation Location	Approximate Date of Claim	Approximate Amount Paid by Medicaid
TWO	Deceased Individual-1	Addiction Treatment Center-1	4/17/2022	\$464.05
THREE	JESSICA HENDRICKSON	Addiction Treatment Center-1	7/5/2022	\$519.21
FOUR	Deceased Individual-2	Addiction Treatment Center-1	7/23/2022	\$461.75

Count	Medicaid Beneficiary	Transportation Location	Approximate Date of Claim	Approximate Amount Paid by Medicaid
FIVE	CC-1	Addiction Treatment Center-1	3/27/2023	\$554.18
SIX	CC-2	Addiction Treatment Center-2	5/3/2023	\$518.28

(Title 18, United States Code, Sections 1347, 2 and 3551 et seq.)

COUNT SEVEN

(Conspiracy to Defraud the United States and Pay Health Care Kickbacks)

36. The allegations contained in paragraphs one through 30 are realleged and incorporated as if fully set forth in this paragraph.

37. In or about and between December 2020 and March 2024, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants NOMAN AHMED, ADNAN ARSHAD, also known as “Eddie,” REHMAN DIWAN, JESSICA HENDRICKSON, JOSE MARTE, MOHAMMED SALEEM, FAISAL SHAMSI, also known as “Jimmy,” and WAQAS SHAMSI, also known as “Ricky,” together with others, did knowingly and willfully conspire to:

(a) defraud the United States, by impairing, impeding, obstructing and defeating through deceitful and dishonest means, the lawful government functions of Medicaid; and

(b) commit certain offenses against the United States, that is, to offer and pay remuneration, including kickbacks and bribes, directly and indirectly, overtly and covertly, in cash and in kind, to one or more beneficiaries to induce those beneficiaries to request transportation services for which payment may have been made in whole and in part under Medicaid, which was a federal health care program, contrary to Title 42, United States Code, Section 1320a-7b(2)(B).

38. In furtherance of the conspiracy and to effect its objects, within the Eastern District of New York and elsewhere, the defendants NOMAN AHMED, ADNAN ARSHAD, also known as “Eddie,” REHMAN DIWAN, JESSICA HENDRICKSON, JOSE MARTE, MOHAMMED SALEEM, FAISAL SHAMSI, also known as “Jimmy,” and WAQAS SHAMSI, also known as “Ricky,” together with others, did commit and cause the commission of, among others, at least one of the following:

OVERT ACTS

(a) On or about November 18, 2021, ARSHAD instructed CC-3 to recruit additional Medicaid beneficiaries, and encouraged CC-3 to instruct those additional beneficiaries to list false home addresses as the pickup addresses for transportation to the Addiction Treatment Centers.

(b) On or about April 8, 2022, SALEEM provided funds to DIWAN so that DIWAN could render kickbacks to Medicaid-recipient co-conspirators.

(c) On or about May 25, 2023, DIWAN rendered an electronic kickback payment of \$70 to CC-4 so that CC-4 would request transportation services from the Defendant Transportation Companies.

(d) On or about August 16, 2023, HENDRICKSON submitted a bill to Medicaid for \$504.13 for transportation services that Sunrise falsely declared were provided by Sunrise to HENDRICKSON.

(e) On or about October 27, 2023, AHMED rendered an electronic kickback payment of \$90 to CC-5 so that CC-5 would request transportation services from the Defendant Transportation Companies.

(f) On or about December 14, 2023, MARTE rendered a cash kickback to undercover officers posing as Medicaid beneficiaries of \$800 so that the undercover officers would request transportation services from the Defendant Transportation Companies.

(g) On or about January 26, 2024, WAQAS SHAMI rendered a cash kickback to undercover officers posing as Medicaid beneficiaries of \$650 so that the undercover officers would request transportation services from the Defendant Transportation Companies.

(h) On or about March 7, 2024, FAISAL SHAMSI rendered a cash kickback to undercover officers posing as Medicaid beneficiaries of \$800 so that the undercover officers would request transportation services from the Defendant Transportation Companies.

(Title 18, United States Code, Sections 371 and 3551 et seq.)

COUNTS EIGHT THROUGH TWELVE  
(Paying Health Care Kickbacks)

39. The allegations contained in paragraphs one through 30 are realleged and incorporated as if fully set forth in this paragraph.

40. On or about the dates set forth below, within the Eastern District of New York and elsewhere, the defendants NOMAN AHMED, ADNAN ARSHAD, also known as “Eddie,” REHMAN DIWAN, JESSICA HENDRICKSON, JOSE MARTE, MOHAMMED SALEEM, FAISAL SHAMSI, also known as “Jimmy,” and WAQAS SHAMSI, also known as “Ricky,” together with others, did knowingly and willfully pay kickbacks and bribes, directly and indirectly, overtly and covertly, in cash and in kind, to one or more Medicaid recipients to induce those Medicaid recipients to request transportation services for which payment may have been made in whole and in part under Medicaid, which was a federal health care program, as set forth below:



Count	Approximate Date	Kickback	Individual that Received Kickback
EIGHT	1/28/2023	\$700	CC-6
NINE	9/30/2023	\$250	CC-7
TEN	10/8/2023	\$260	CC-8
ELEVEN	10/16/2023	\$370	CC-9
TWELVE	10/25/2023	\$300	CC-10

(Title 42, United States Code, Section 1320a-7b(2)(B); Title 18, United States Code, Sections 2 and 3551 et seq.)

COUNT THIRTEEN  
(Conspiracy to Commit Money Laundering)

41. The allegations contained in paragraphs one through 30 are realleged and incorporated as if fully set forth in this paragraph.

42. In or about and between December 2020 and March 2024, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants NOMAN AHMED, ADNAN ARSHAD, also known as “Eddie,” REHMAN DIWAN, JOSE MARTE, MOHAMMED SALEEM, FAISAL SHAMSI, also known as “Jimmy,” and WAQAS SHAMSI, also known as “Ricky,” together with others, did knowingly and intentionally conspire to conduct one or more financial transactions in and affecting interstate commerce, which in fact involved the proceeds of specified unlawful activity, to wit: healthcare fraud, conspiracy to commit healthcare fraud, and conspiracy to defraud the United States and pay health care kickbacks in violation of Title 18, United States Code, Sections 1347, 1349 and 351, respectively, knowing that the property involved in the transactions represented the proceeds of some form of unlawful activity, and knowing that the transactions were designed

in whole and in part to promote the carrying on of specified unlawful activity, contrary to Title 18, United States Code, Section 1956(a)(1)(A)(i).

(Title 18, United States Code, Sections 1956(h) and 3551 et seq.)

CRIMINAL FORFEITURE ALLEGATION  
AS TO COUNTS ONE THROUGH TWELVE

43. The United States hereby gives notice to the defendants that, upon their conviction of any of the offenses charged in Counts One through Twelve, the government will seek forfeiture in accordance with Title 18, United States Code, Section 982(a)(7), which requires any person convicted of a federal health care offense to forfeit property, real or personal, that constitutes, or is derived directly or indirectly from, gross proceeds traceable to the commission of such offenses, including but not limited to:

- (i) all right, title and interest in the real property and premises located at 111 Chestnut Street, Mount Sinai, New York 11766, and all proceeds traceable thereto;
- (ii) all right, title and interest in the real property and premises located at 919 Middle Country Road, Selden, New York 11784, and all proceeds traceable thereto;
- (iii) all right, title and interest in the real property and premises located at 166 River Road, Shirley, New York 11967, and all proceeds traceable thereto;
- (iv) all right, title and interest in the real property and premises located at 5 Sienna Court Dix Hills, NY 11746, and all proceeds traceable thereto;
- (v) JPMorgan Chase Bank, N.A. Account Number 771-080238 held in the name of Apollo Transportation NY Corp., and all proceeds traceable thereto;
- (vi) TD Bank, N.A. Account Number 4436270550 held in the name of Apollo Transportation NY Corp., and all proceeds traceable thereto;

- (vii) Citibank, N.A. Account Number 6881788543 held in the name of 668 MTK Taxi, LLC, and all proceeds traceable thereto;
- (viii) JPMorgan Chase Bank, N.A. Account Number 557-117085 held in the name of Double AA Management LLC, and all proceeds traceable thereto;
- (ix) Citibank, N.A. Account Number 12023707330 held in the name of Adnan Arshad, and all proceeds traceable thereto;
- (x) Citibank, N.A. Account Number 12023707349 held in the name of Adnan Arshad, and all proceeds traceable thereto;
- (xi) TD Bank, N.A. Account Number 6807773270 held in the name of Mohammed Saleem, and all proceeds traceable thereto;
- (xii) TD Bank, N.A. Account Number 4436263357 held in the name of Mohammed Saleem, and all proceeds traceable thereto;
- (xiii) one 2014 Ferrari bearing Vehicle Identification Number (“VIN”) ZFF67NFA1E0200445, and all proceeds traceable thereto;
- (xiv) one 2016 Mercedes GTS bearing VIN WDDYJAJA1GA000791, and all proceeds traceable thereto;
- (xv) one 2022 Mercedes G63 bearing VIN W1NYC7HJ6NX453286, and all proceeds traceable thereto;
- (xvi) one 2020 BMW M5 bearing VIN WBSJF0C02LCD25035, and all proceeds traceable thereto;
- (xvii) one 2023 Toyota Sienna bearing VIN 5TDKRKEC5PS141991, and all proceeds traceable thereto;
- (xviii) one 2023 Toyota Camry bearing VIN 4T1C11AK2PU112944, and all proceeds traceable thereto;

- (xix) one 2023 Toyota Sienna bearing VIN 5TDKRKEC6PS146021, and all proceeds traceable thereto;
- (xx) one 2023 Toyota Camry bearing VIN 4T1C11BK0PU095995, and all proceeds traceable thereto;
- (xxi) one 2023 Toyota Sienna bearing VIN 5TDKRKECXPS172640, and all proceeds traceable thereto;
- (xxii) one 2023 Toyota Camry bearing VIN 4T1C11AK3PU139232, and all proceeds traceable thereto;
- (xxiii) one 2023 Toyota Camry bearing VIN 4T1C11AK2PU171587, and all proceeds traceable thereto;
- (xxiv) one 2019 Ford Transit bearing VIN 1FBAX2CM7KKA61920, and all proceeds traceable thereto;
- (xxv) one 2020 Ford Transit bearing VIN 1FBAX2XGXLKB20111, and all proceeds traceable thereto;
- (xxvi) one 2021 Ford Transit bearing VIN 1FBAX2C80MKA31387, and all proceeds traceable thereto; and
- (xxvii) one 2023 Toyota Sienna bearing VIN 5TDXSKFC8PS098594, and all proceeds traceable thereto.

44. 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), as incorporated by Title 18, United States Code, Sections 982(b)(1), 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, Sections 982(a)(7) and 982(b)(1); Title 21, United States Code, Section 853(p))

CRIMINAL FORFEITURE ALLEGATION  
AS TO COUNT THIRTEEN

42. The United States hereby gives notice to the defendants charged in Count Thirteen that, upon their conviction of such offense, the government will seek forfeiture in accordance with Title 18, United States Code, Section 982(a)(1), which requires any person convicted of such offense to forfeit any property, real or personal, involved in such offense, or any property traceable to such property, including but not limited to:

- (i) all right, title and interest in the real property and premises located at 111 Chestnut Street, Mount Sinai, New York 11766, and all proceeds traceable thereto;
- (ii) all right, title and interest in the real property and premises located at 919 Middle Country Road, Selden, New York 11784, and all proceeds traceable thereto;
- (iii) all right, title and interest in the real property and premises located at 166 River Road, Shirley, New York 11967, and all proceeds traceable thereto;
- (iv) all right, title and interest in the real property and premises located at 5 Sienna Court Dix Hills, NY 11746, and all proceeds traceable thereto;

- (v) JPMorgan Chase Bank, N.A. Account Number 771-080238 held in the name of Apollo Transportation NY Corp., and all proceeds traceable thereto;
- (vi) TD Bank, N.A. Account Number 4436270550 held in the name of Apollo Transportation NY Corp., and all proceeds traceable thereto;
- (vii) Citibank, N.A. Account Number 6881788543 held in the name of 668 MTK Taxi, LLC, and all proceeds traceable thereto;
- (viii) JPMorgan Chase Bank, N.A. Account Number 557-117085 held in the name of Double AA Management LLC, and all proceeds traceable thereto;
- (ix) Citibank, N.A. Account Number 12023707330 held in the name of Adnan Arshad, and all proceeds traceable thereto;
- (x) Citibank, N.A. Account Number 12023707349 held in the name of Adnan Arshad, and all proceeds traceable thereto;
- (xi) TD Bank, N.A. Account Number 6807773270 held in the name of Mohammed Saleem, and all proceeds traceable thereto;
- (xii) TD Bank, N.A. Account Number 4436263357 held in the name of Mohammed Saleem, and all proceeds traceable thereto;
- (xiii) one 2014 Ferrari bearing Vehicle Identification Number (“VIN”) ZFF67NFA1E0200445, and all proceeds traceable thereto;
- (xiv) one 2016 Mercedes GTS bearing VIN WDDYJAJA1GA000791, and all proceeds traceable thereto;
- (xv) one 2022 Mercedes G63 bearing VIN W1NYC7HJ6NX453286, and all proceeds traceable thereto;
- (xvi) one 2020 BMW M5 bearing VIN WBSJF0C02LCD25035, and all proceeds traceable thereto;

- (xvii) one 2023 Toyota Sienna bearing VIN 5TDKRKEC5PS141991, and all proceeds traceable thereto;
- (xviii) one 2023 Toyota Camry bearing VIN 4T1C11AK2PU112944, and all proceeds traceable thereto;
- (xix) one 2023 Toyota Sienna bearing VIN 5TDKRKEC6PS146021, and all proceeds traceable thereto;
- (xx) one 2023 Toyota Camry bearing VIN 4T1C11BK0PU095995, and all proceeds traceable thereto;
- (xxi) one 2023 Toyota Sienna bearing VIN 5TDKRKECXPS172640, and all proceeds traceable thereto;
- (xxii) one 2023 Toyota Camry bearing VIN 4T1C11AK3PU139232, and all proceeds traceable thereto;
- (xxiii) one 2023 Toyota Camry bearing VIN 4T1C11AK2PU171587, and all proceeds traceable thereto;
- (xxiv) one 2019 Ford Transit bearing VIN 1FBAX2CM7KKA61920, and all proceeds traceable thereto;
- (xxv) one 2020 Ford Transit bearing VIN 1FBAX2XGXLKB20111, and all proceeds traceable thereto;
- (xxvi) one 2021 Ford Transit bearing VIN 1FBAX2C80MKA31387, and all proceeds traceable thereto; and
- (xxvii) one 2023 Toyota Sienna bearing VIN 5TDXSKFC8PS098594, and all proceeds traceable thereto.

43. 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), as incorporated by Title 18, United States Code, Section 982(b)(1), 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, Sections 982(a)(1) and 982(b)(1); Title 21, United States Code, Section 853(p))

A TRUE BILL



---

FOREPERSON

*By Carolyn Pokorny, Assistant US Attorney*

---

BREON PEACE  
UNITED STATES ATTORNEY  
EASTERN DISTRICT OF NEW YORK