

United States District Court
District of New Jersey

UNITED STATES OF AMERICA : **Hon. Steven C. Mannion**

v. : **Magistrate No.: 16-6043 (SCM)**

SHAHJADI PARVIN, : **Criminal Complaint**
a/k/a "Sarah Patel"


I, David A. Ferrante, the undersigned complainant being duly sworn,
state the following is true and correct to the best of my knowledge and belief.

SEE ATTACHMENT A

I further state that I am a Special Agent with the United States
Department of Homeland Security, Homeland Security Investigations ("HSI"),
and that this complaint is based on the following facts:

SEE ATTACHMENT B

continued on the attached page and made a part hereof.


David A. Ferrante, Special Agent
U.S. Department of Homeland
Security, Homeland Security
Investigations

Sworn to before me and subscribed in my presence,

March 30, 2016 at
Date

Newark, New Jersey
City and State

Honorable Steven C. Mannion
United States Magistrate Judge
Name & Title of Judicial Officer


Signature of Judicial Officer

ATTACHMENT A

COUNT ONE
(Conspiracy to Commit Visa Fraud)

From in or about February 2014 through in or about March 2016, in Union County, in the District of New Jersey, and elsewhere, defendant

SHAHJADI PARVIN
a/k/a "Sarah Patel,"

did knowingly and intentionally conspire and agree with others to commit an offense against the United States, that is, to utter, use, attempt to use, possess, obtain, accept, and receive non-immigrant visas, namely student visas and other documents proscribed by statute and regulation for entry into and as evidence of authorized stay in the United States, knowing that the documents had been procured by means of false claims and statements and otherwise procured by fraud and unlawfully obtained, contrary to Title 18, United States Code, Section 1546(a).

In furtherance of the conspiracy and to effect its unlawful objects, the defendant committed and caused to be committed the following overt acts, among others, in the District of New Jersey and elsewhere, as set forth in Attachment B below.

In violation of Title 18, United States Code, Section 371.

COUNT TWO
(Conspiracy to Harbor Aliens for Profit)

From in or about February 2014 through in or about March 2016, in Union County, in the District of New Jersey, and elsewhere, defendant

SHAHJADI PARVIN
a/k/a "Sarah Patel,"

did knowingly and intentionally conspire and agree with others, for the purpose of commercial advantage and private financial gain, to encourage and induce an alien to reside in the United States, knowing and in reckless disregard of the fact that such residence was and would be a violation of law, contrary to Title 8, United States Code, Section 1324(a)(1)(A)(iv).

In violation of Title 8, United States Code, Section 1324(a)(1)(A)(v)(I).

ATTACHMENT B

I, David A. Ferrante, am a Special Agent with the United States Department of Homeland Security, Homeland Security Investigations ("HSI"). I have personally participated in this investigation and am aware of the facts and circumstances contained herein based on my own investigation, as well as my review of documents, records, information and evidence provided to me by other law enforcement officers and relevant personnel. Since this Affidavit is submitted for the sole purpose of establishing probable cause to support the issuance of a complaint and arrest warrant, I have not necessarily included each and every fact known by the government concerning this investigation. Where statements of others are related herein, they are related in substance and in part. Where I assert that an event took place on a particular date, I am asserting that it took place on or about the day alleged.

The Defendant and Other Parties

1. At all times relevant to this Criminal Complaint:

a. Defendant SHAHJADI M. PARVIN, a/k/a "Sarah Patel," ("PARVIN"), was a citizen of the United States, residing in Hackensack, New Jersey. PARVIN was the owner, chief executive officer, and president of American Institute of Pharmaceutical Technology ("AIPT"), located in Hackensack. PARVIN was also a registered agent for Access Careers Institute ("Access Careers"), located in Brooklyn, New York. At various times, AIPT and Access Careers purported to offer training in various medical professions and English as a Second Language. AIPT and Access Career have facilitated the entry of foreign students into the United States.

b. A federal agent was acting in an undercover capacity (hereinafter "UC-1").

c. A federal agent was acting in an undercover capacity (hereinafter "UC-2").

d. Federal agents were acting in an undercover capacity and posing as the owner and/or operators of the University of Northern New Jersey (hereinafter the "School"). The School was physically located in Cranford, New Jersey. The School was part of a federal law enforcement undercover operation designed to identify individuals and entities engaged in immigration fraud. The School was not staffed with instructors /educators, had no curriculum, and no actual classes or educational activities were conducted at the School.

e. A co-conspirator not named as a defendant herein was a foreign citizen who fraudulently maintained student visa status through PARVIN (hereinafter "CC-1").

Summary of Investigation

2. Beginning in or about September 2013, federal agents from HSI, using the School, commenced an undercover operation to investigate criminal activities associated with the Student and Exchange Visitor Program ("SEVP"), including, but not limited to, student visa fraud and the harboring of aliens for profit. A brief summary of the SEVP is described in Paragraph 4, below.

3. During the course of the investigation, HSI agents identified numerous individuals and organizations that used the SEVP as an instrument to engage in criminal conduct. Specifically, as described more fully below, the investigation has revealed that PARVIN enabled numerous foreign individuals to fraudulently maintain non-immigrant status and obtain employment authorization to remain in the United States on the false pretense that these aliens were participating in full courses of study at an academic institution.¹ In truth and in fact, PARVIN, with full knowledge that the aliens would not attend any actual courses, earn actual credits, or make academic progress toward an actual degree in a particular field of study, fraudulently maintained student visa status in exchange for kickbacks, or "commissions" from individuals she believed were co-schemers. Additionally, PARVIN facilitated the creation of false student records, including transcripts, for some of the foreign students for the purpose of deceiving immigration authorities.

Summary of Relevant Immigration Policies and Procedures

4. From my training and experience as a Special Agent with HSI, and from speaking with individuals and officials with knowledge of the SEVP with the Department of Homeland Security, I have learned about the requirements that foreign citizens must comply with under United States immigration law, including the following:

a. The United States requires individuals from most foreign countries to obtain a visa prior to entry into the United States. As they apply to this investigation, nonimmigrant visas are required for foreign citizens who intend to enter the United States on a temporary basis, such as for tourism, medical treatment, business, temporary work, or study.²

1. Your Affiant is aware that this type of SEVP-related fraud is commonly referred to as a "pay to stay" scheme.

2. Under 8 U.S.C. § 1101 (a)(15)(F)(i), an F-1 student (*i.e.*, a non-immigrant alien) admitted to the United States on a temporary basis to pursue a course of study).

b. A foreign citizen who wishes to enter and remain in the United States on a temporary basis to pursue a course of study at a college, university, seminary, conservatory, academic high school, or other academic institution, or for English language training (commonly referred to as "ESL"³), must first obtain an F-1 non-immigrant visa, also known as a student visa ("F-1 visa").

c. An F-1 visa is only valid for a temporary period, called the "duration of status," which status lasts as long as the foreign citizen is enrolled as a full-time student in an approved educational program and making normal progress toward completion of the course of study.⁴ Pursuant to 8 C.F.R. § 214.2(f)(6), a full course of study for a foreign citizen studying a language or other non-vocational training program under an F-1 visa (an "F-1 student") requires eighteen (18) clock hours of attendance per week, assuming the dominant portion of the course consists of classroom instruction. Significantly, when a foreign citizen stops pursuing a full course of study, the duration of status on his or her F-1 visa ends and the temporary period for which the individual was admitted to the United States expires.

d. To obtain an F-1 visa, a foreign citizen must first apply to study at a school within the United States that has been certified by the SEVP to enroll and train foreign students. If accepted, the school will provide the foreign citizen with a "Certificate of Eligibility for Nonimmigrant (F-1) Student Status - For Academic and Language Students," also known as a Form I-20 A

is defined as follows: "an alien having a residence in a foreign country which he has no intention of abandoning, who is a bona fide student qualified to pursue a full course of study and who seeks to enter the United States temporarily and solely for the purpose of pursuing such a course of study consistent with section 1184(l) of this title at an established college, university, seminary, conservatory, academic high school, elementary school, or other academic institution or in an accredited language training program in the United States, particularly designated by him and approved by the Attorney General after consultation with the Secretary of Education. . . ."

3. One area of study available to F-1 students includes English language training, or ESL, courses. In order to pursue ESL studies, an F-1 student must enroll in an SEVP-certified English language training program. ESL students are not eligible for online or distance education, as all training must take place in a classroom (or computer lab) setting for a minimum of eighteen (18) hour per week. A foreign citizen who is granted an F-1 visa to participate in an ESL program may not obtain work authorization.

4. Certain F-1 students (identified as "Border Crossing" students from Mexico or Canada who attend a school within 75 miles of a land border) may be admitted to the United States until a date certain, rather than for duration of status. See, 8 C.F.R. § 214.2(f)(18). None of the foreign individuals associated with this investigation were the recipient of a "Border Crossing" F-1 visa.

("Form I-20"). The Form I-20 is required for the foreign citizen to obtain an F-1 visa. By issuing a Form I-20 to a foreign citizen, an SEVP-approved school certifies that the individual: (1) meets all standards of admission for the school based on a review of the student's application, transcripts, proof of financial responsibility, and other records; and (2) has been accepted for, and would be required to pursue, a full course of study.

e. Once a foreign citizen receives a Form I-20, that individual may apply for an F-1 visa. The foreign citizen can then use the F-1 visa and Form I-20 to enter and remain in the United States for the period of time he or she is granted. After a foreign citizen completes his or her course of study, that individual is typically required to depart the United States within 60 days. Conversely, if the foreign student fails to maintain status (*e.g.*, stops attending school, drops below the full course of study without authorization, etc.), the foreign student must immediately depart the United States.

f. The Student and Exchange Visitor Information System ("SEVIS") is an internet based data system that provides users with access to current information on nonimmigrant foreign citizens, exchange aliens, and their dependents. Each Form I-20 that is issued by a school to a foreign citizen will contain a system-generated identification number. This number is referred to as the "SEVIS ID number." Generally, the SEVIS ID number remains the same as long as the foreign citizen maintains his or her valid, original nonimmigrant status. This number will typically remain the same regardless of any changes or updates made by the school to the foreign citizen's record.

g. Once in the United States, a foreign citizen is generally permitted to transfer from one SEVP-certified school to another, as long as that individual maintains valid F-1 student status and is pursuing a full course of study. To effect such a transfer while maintaining valid status, a foreign citizen must first obtain a school acceptance letter and a SEVIS transfer form from the SEVP-certified school to which the student intends to transfer. The foreign citizen may then transfer to that school, obtain a Form I-20, and remain in the United States as long as he or she pursues a full course of study at the new SEVP-certified school.⁵

5. Every SEVP-approved school must have one Primary Designated School Official ("PDSO") who, among other things, certifies under penalty of perjury on the Form I-20 that the foreign student's application, transcripts, or other records of courses taken, and proof of financial responsibility - including proof that the student has the funds necessary to live and study in the United States without working illegally or suffering from poverty - were received by the school and the student met the qualifications for admission. The PDSO also certifies that the foreign student will be required to pursue a full course of study as defined by the regulations in 8 C.F.R. § 214.2(f)(6). The forgoing certification responsibilities of the PDSO may also be handled by a Designated School Official ("DSO").

h. In addition to taking a full course of study at an accredited institution, a non-ESL, F-1 student may also seek practical training – which could include paid employment - that is directly related to the student's major and is considered part of the student's program of study. The two types of practical training available to non-ESL, F-1 students include curricular practical training ("CPT") and optional practical training ("OPT"). If approved by the PDSO (or DSO), an F-1 student may obtain a new Form I-20 indicating that he or she has been approved for either CPT or OPT. Generally, therefore, as long as an F-1 student has been properly enrolled at an SEVP certified school, has taken classes and earned credits, and has made academic progress toward graduation, that F-1 student may have the opportunity to work full or part-time CPT or OPT, in addition to taking classes.⁶

SEVP certified schools also are required to maintain up to date and accurate records in SEVIS regarding the foreign students attending the school and are required to input accurately when students have completed their studies so that their immigration status can be terminated. The PDSO (or DSO) is also required to maintain up to date and accurate records in the SEVIS database for status events of foreign students attending their school including, but not limited to: entry/exit data, changes of current United States address (residence), program extensions, employment notifications, changes in program of study, and completion of studies so the student's immigration status can be timely terminated.

Additionally, if a foreign citizen admitted on an F-1 visa to attend an SEVP-certified school has not pursued a full course of study at the school, a PDSO (or DSO) is prohibited from transferring that foreign citizen to another school. Pursuant to 8 C.F.R. § 214.2(8)(i), an F-1 student who was not pursuing a full course of study at the school he or she was last authorized to attend is ineligible for school transfer and must apply for reinstatement, or, in the alternative, may depart the U.S. and return as an initial entry in a new F-1 nonimmigrant status. Once an SEVP-certified school terminates an F-1 student's active status in SEVIS for "Unauthorized Drop Below Full Course of Study," thereby flagging the F-1 student's termination for review by the Department of Homeland Security, SEVP guidance allows the school to then transfer the F-1 student's SEVIS records *in terminated status* to another school. The terminated F-1 student must then file an application for reinstatement of active status with the support of the school the student is transferring to, or depart the United States. Further, an F-1 student who has not been pursuing a full course of study at an SEVP-certified school cannot be transferred to another school unless and until his or her active status has been terminated in SEVIS.

6. Practical training may be authorized to an F-1 student who has been lawfully enrolled on a full time basis, in a SEVP-certified institution, for one full academic year. CPT is more specifically defined as an alternative work/study, internship, cooperative education, or any other type of required internship or practicum that is offered by sponsoring employers through cooperative agreements with a given SEVP-certified institution. An F-1 student may be authorized by the PDSO (or DSO) to participate in a CPT program that is an integral part of an established curriculum. A student may begin CPT only after receiving his or her Form I-20 with the PDSO (or DSO) endorsement. A student may be authorized 12 months

The Defendant's Criminal Activities

5. Beginning in or about January 2014, PARVIN solicited School officials, acting in an undercover capacity, to ascertain potential recruiting opportunities. Specifically, by e-mail dated on or about January 11, 2014, PARVIN contacted School personnel to offer her services as a recruiter. PARVIN stated, in part, "I am planning to visit tour [sic] place and meet personally to discuss business opportunity for student recruitment." Over the course of the next few weeks, and in response to PARVIN's inquiries, UC-1 engaged in several consensually recorded telephone conversations and in-person meetings with PARVIN to discuss the Defendant's proffered recruiting services.

6. For example, on or about January 24, 2014, UC-1 met with PARVIN and an associate at the School and engaged in a consensually recorded conversation concerning a potential business relationship between the parties. During this meeting, PARVIN explained that she and her associate operated a one-year college in New York (the "NY Enterprise"), and they recruited foreign students. PARVIN claimed that the NY Enterprise was accredited, and that it offered international students enrollment opportunities in connection with the "M" visa⁷ program. PARVIN stated that 200 to 300 students were currently enrolled at the NY Enterprise. PARVIN and UC-1 also discussed the School's illicit practice of maintaining immigration status for purported foreign students without requiring those individuals to actually attend any classes. With regard to students who simply required admission in an ESL program, UC-1 advised PARVIN that they could simply sign fake attendance sheets for classes the purported students would never attend.

7. Thereafter, on or about February 6, 2014, PARVIN contacted UC-1 and engaged in several consensually recorded telephone conversations. During these calls, PARVIN acknowledged that her recruits intended to use their potential "enrollment" at the School to maintain immigration status and would not be taking classes at the School. UC-1, in an attempt to clarify the terms of the illicit arrangement, stated, in part, "I don't want [the client] to expect to be sitting in a classroom or anything." PARVIN replied, "I already told [the client] that you, you know . . . all those things: that he's, he's not coming over here. He [the purported student] will be in New York and he just needs to get the

of practical training, and becomes eligible for another 12 months of practical training when he or she changes to a higher educational level. Exceptions to the one academic year requirement prior to obtaining CPT approval are provided for students enrolled in graduate studies that require immediate participation in curricular practical training. See 8 C.F.R. § 214.2 (10).

7. An M Visa is a type of student visa reserved for vocational and technical schools.

CPT.” PARVIN also advised UC-1 that she had already recruited at least one client for the School. PARVIN explained that the client had been expelled from his previous legitimate school for failing to attend classes. PARVIN stated “so, [the client] was not going [to his previous school], so when I told him that, you know, we have this, this option, he said okay.” Additionally, PARVIN and UC-1 negotiated “tuition” prices for the purported foreign students’ enrollment at the School. As part of these negotiations, PARVIN explained to UC-1 that she planned to keep fifty percent of the tuition she collected from her School recruits for herself as a commission payment, stating, “So I will, I will ask for myself the 50%.”

8. Based, in part, on the foregoing discussions, PARVIN began to facilitate the enrollment of dozens of purported foreign students at the School, knowing that the individuals she referred were not bona fide students and had no intention of attending classes or earning credits at the School. In exchange for receiving a Form I-20 from the School and being reported in SEVIS as a legitimate foreign student, PARVIN’s recruits made “tuition” payments to the School that corresponded to the length of time that the purported foreign students were enrolled. For each foreign student referred by PARVIN and subsequently “enrolled” at the School, PARVIN took a percentage of each foreign student’s tuition payments as commission for her recruiting services. Once an alien was referred to the School, PARVIN routinely followed up with School personnel via telephone and e-mail to track the status of the issuance of relevant immigration documents, including Forms I-20 and CPT documentation, for their recruits. The Forms I-20 that PARVIN caused the School to issue to PARVIN’s recruits were falsely made and procured by fraud. PARVIN knew the Forms I-20 were fraudulent because her recruits would not be attending any classes at the School and would not be making any academic progress toward a legitimate degree in an established curriculum; indeed, the Forms I-20 were procured by PARVIN to fraudulently maintain the foreign recruits’ immigration and work status in the United States. Significantly, the majority of individuals referred by PARVIN enrolled at the School in an effort to falsely obtain and extend CPT eligibility, so that those individuals could continue to reside and work in the United States in contravention of U.S. immigration laws.⁸

9. During the course of the conspiracy, PARVIN repeatedly acknowledged the illegal nature of her ongoing activities. For example, on or about August 8, 2014, PARVIN and UC-1 engaged in a consensually recorded meeting. During their conversation, PARVIN sought to obtain immigration documents for one of her recruits, who resided in California, but who wanted to be listed as a student at the School. PARVIN told UC-1, “I just want to be

8. From in or about February 2014 through in or about March 2016, PARVIN recruited and referred approximately 35 foreign individuals to the School, and collected thousands of dollars in fees as a result of her illicit activities.

honest with you. So [the recruit] wanted to transfer but he want to get a CPT so he can do his, keep working." PARVIN and UC-1 also renegotiated the prices for her clients' tuition, false immigration documents, and false diplomas and transcripts from the School. Ultimately, UC-1 and PARVIN agreed that the School should receive at least \$4,000 to provide illicit services for each one of PARVIN's purported foreign students. PARVIN agreed, and further stated, "maybe we charge \$8,000 . . . also you get your \$4,000, I get my \$4,000 . . . I'm gonna pay . . . I'll collect from them and I'll give to you."

10. On other occasions, PARVIN confirmed the fraudulent nature of her recruiting services for the School's ESL program. Specifically, on or about September 9, 2014, PARVIN met with UC-1 and engaged in a consensually recorded conversation. During this meeting, PARVIN explicitly stated that she enrolled purported foreign students in the School's ESL program for the sole purpose of falsely maintaining their immigration status. Thereafter, during a consensually recorded conversation on February 24, 2015, PARVIN explained to UC-1 that the School was a good option for clients enrolled at the NY Enterprise who did not want to attend class, but rather wanted only to maintain their immigration status. PARVIN stated, in part, "my school [*i.e.*, the NY Enterprise] mostly you know I want it to run like a regular school, so if, if I have students, they don't want to come and they are far, so I . . . that's why I register for your school."

11. In many instances, PARVIN engaged in conduct designed to thwart potential scrutiny of the School and her illegal activities by law enforcement and immigration officials. For example, during a consensually recorded meeting with UC-1 on or about August 19, 2014, PARVIN proposed that the purported foreign students she enrolled at the School complete fake attendance sheets, even though they would not be attending classes. PARVIN told UC-1, "I think we can do some kind of, like, email. Like a, some kind of, you know attendance or they can save somewhere." Similarly, during a consensually recorded conversation with UC-1 on September 3, 2014, PARVIN suggested that the students complete attendance sheets despite their failure to attend any actual classes. Thereafter, in or about April 2015, UC-1 contacted PARVIN and requested her assistance in obtaining the bogus attendance sheets from her recruits, and PARVIN complied. For example, by e-mail dated on or about April 27, 2015, PARVIN sent one of her recruits a fake student attendance record and requested that the client sign the form although the client never attended a single class at the School. PARVIN ultimately obtained the completed attendance sheet from her recruit and provided it to UC-1 by e-mail dated May 14, 2015.

12. In addition to Forms I-20, PARVIN used the School to obtain a number of false and fraudulent documents for her clients, including fake academic transcripts, diplomas, and other education records, which were intended to deceive U.S. immigration officials. For example, by e-mail dated

October 12, 2015, PARVIN contacted UC-1 to discuss documents she wanted to obtain for one of PARVIN's School recruits ("CC-1"). Specifically, UC-1 was informed that an H1-B⁹ visa application had been filed on CC-1's behalf, and that U.S. immigration officials had requested additional information for CC-1's file (this request is commonly referred to as a "request for evidence," or "RFE").¹⁰ In particular, PARVIN asked UC-1 to send her a fake transcript for CC-1, along with various other false documents responsive to the RFE. Later, by e-mail dated October 19, 2015, CC-1 emailed PARVIN several draft RFE reply documents that CC-1 wanted to be finalized on School letterhead. These false documents included a fake School diploma, a fake transcript, and false attendance sheets. PARVIN then forwarded CC-1's October 19, 2015 e-mail to UC-1 to request his assistance with same. Thereafter, by e-mail dated October 26, 2015, PARVIN sent UC-1 several more draft RFE reply documents, with instructions to "fill up all require form for [CC-1's] RFE. Sing [sic] those and send me back." The documents attached to PARVIN's October 26, 2015 e-mail included a false letter to USCIS from the School, an official payment receipt, a false student attendance record, and a false transcript. Subsequently, by e-mail dated November 11, 2015, UC-1 sent PARVIN and CC-1 a number of blank, or "template," documents that PARVIN and CC-1 could use for their RFE response to USCIS. The documents provided by UC-1 included the following: (i) a blank School transcript; (ii) a receipt evidencing purported fees paid by CC-1 for School tuition; and (iii) a letter from the School to USCIS purporting to

9. An H-1B visa permits an alien to work in the United States subject to certain requirements. Generally, the program allows businesses in the United States to employ foreign workers with specialized or technical expertise in a particular field such as accounting, engineering, or computer science. Before hiring a foreign worker under the Program, the employer must first obtain approval from the United States Department of Labor ("DOL") and the U.S. Citizenship and Immigration Services ("USCIS") to hire a specific individual. This approval is obtained, in part, by filing a "Petition for a Nonimmigrant Worker, Form I-129," (commonly referred to as an H1-B visa), and paying certain fees. In this petition, the employer is required to truthfully provide biographical information regarding the specific foreign worker to be employed, including job title, the specific type of position for which the worker is hired, work location, pay rate, dates of intended employment, and whether the position is full-time. The petition is signed under penalty of perjury, and the employer must certify that the information submitted is true and correct. Ultimately, if USCIS approves this petition (and assuming the foreign worker is already lawfully in the U.S.), then the foreign worker's immigration status can be adjusted without the worker having to leave the country.

10. The USCIS periodically issues a request for evidence ("RFE") in connection with its review of various immigration petitions. As it applies to the instant investigation, documents typically provided by a petitioner in response to a RFE include, among others, proof of enrollment and payment of tuition, student identification cards, student transcripts and attendance records, proof of CPT work authorization and cooperative employer-student agreements, diplomas, and other education-related materials.

document CC-1's School enrollment, major course of study, and CPT work authorization. UC-1 further advised PARVIN and CC-1 that the cost for providing the false documents was \$620. These false documents were requested to trick USCIS into believing that CC-1 was lawfully enrolled in the School and had lawful status in an effort to induce USCIS to convert CC-1's F-1 status into an H1-B status (which H1-B status can later be changed into lawful permanent resident status). Finally, by e-mail dated November 19, 2015, UC-1 emailed CC-1 and PARVIN final copies of signed, fake documents, including a School transcript, diploma, and identification card. Significantly, law enforcement agents' review of official records maintained by USCIS has confirmed that the false School documents obtained by PARVIN and CC-1 were, in fact, submitted to U.S. immigration authorities in support of CC-1's H1-B application.

13. PARVIN's illicit activities were not limited to recruitment of purported foreign students for the School, as summarized above. In fact, PARVIN used the NY Enterprise to assist UC-1 in fraudulently obtaining non-immigrant status for purported foreign students from outside the United States. Specifically, during a consensually recorded conversation on or about March 5, 2015, UC-1 told PARVIN that UC-1 wished to enroll students from abroad at PARVIN's school. Unbeknownst to PARVIN, these "students" were not actually real individuals; rather, their false identities existed only on paper in connection with the ongoing undercover operation. UC-1 told PARVIN that the students would not reside in New Jersey and would therefore be unable to attend classes at PARVIN's school. PARVIN indicated that if the students were not going to attend class, they would have to agree to a "different" tuition payment schedule, stating, "now if they don't [attend class], then we have to think that, you know, like, you know, if they come . . . like our, condition, our condition is that payment has to be clear. . . ." Later that day, PARVIN contacted UC-1 by e-mail and stated that - using the NY Enterprise - she could issue Forms I-20 for "M" visas to UC-1's purported foreign students, and that she would need to be paid \$12,000 per client to do so. Thereafter, by e-mails dated on or about July 13, 2015, and on or about July 29, 2015, UC-1 provided PARVIN the necessary information for his purported foreign students, and asked PARVIN for an acceptance letter from the NY Enterprise, along with Forms I-20 for each individual. UC-1 further specified that, "these clients will be for entry and status only." Subsequently, on or about August 6, 2015, PARVIN facilitated the issuance of an M-1 Visa to one of UC-1's purported (undercover) foreign clients, which visa would permit the individual to enter the United States from abroad. PARVIN signed the false M-1 Visa for UC-1's purported foreign student knowing that UC-1's recruit would not be a bona fide student at the NY Enterprise. Several weeks later, on or about September 30, 2015, PARVIN met with UC-1 at the School and engaged in a consensually recorded conversation. During this meeting, PARVIN accepted a check in the amount of \$24,000, which funds were derived from the undercover operation.

The check represented PARVIN's payment for facilitating the illegal entry of purported foreign students into the United States.