

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA	:	Hon.
	:	
v.	:	Crim. No. 24-
	:	
MONISHKUMAR KIRANKUMAR	:	18 U.S.C. § 1349
DOSHI SHAH,	:	18 U.S.C. §§ 1960(a), (b)(1)(A),
a/k/a “Monish Doshi Shah”	:	and (b)(1)(B)
	:	18 U.S.C. § 2

I N F O R M A T I O N

The defendant having waived in open court prosecution by Indictment, the United States Attorney for the District of New Jersey charges:

COUNT ONE

(Conspiracy to Commit Wire Fraud)

Background

1. At certain times relevant to this Information:
 - a. Defendant MONISHKUMAR KIRANKUMAR DOSHI SHAH, a/k/a “Monish Doshi Shah” (“SHAH”) lived in Jersey City, New Jersey and/or Mumbai, India.
 - b. SHAH owned and/or operated entities purportedly engaged in the jewelry and precious metals industry, including MKore LLC (“MKore”), MKore USA Inc (“MKore USA”), Vruman Corp (“Vruman”), Pani Trading Co. ltd, d/b/a “Pani Trading Company” (“Pani Trading”), and KT International Co. Ltd. (“KT International”).
 - i. MKore was incorporated in New Jersey and had a principal place of business in New York.

- ii. MKore USA was incorporated in New York and had a principal place of business in New York.
 - iii. Vruman was incorporated in New York and had a principal place of business in New York.
 - iv. Pani Trading had a principal place of business in South Korea.
 - v. KT International had a principal place of business in South Korea.
- c. Co-Conspirator-1 resided in Edison, New Jersey and controlled numerous purported jewelry, diamond, and precious metals businesses registered and operated in New York and New Jersey.
- d. Co-Conspirator-2 lived in Great Neck, New York and operated a purported jewelry company registered and operated in New York (Co-Conspirator-2, together with Co-Conspirator-1, the “Co-Conspirators”).

The Conspiracy

2. From in or around December 2019 through in or around April 2022, in Middlesex and Hudson Counties, in the District of New Jersey, and elsewhere, the defendant,

**MONISHKUMAR KIRANKUMAR DOSHI SHAH,
a/k/a “Monish Doshi Shah,”**

knowingly and intentionally conspired and agreed with the Co-Conspirators and others to devise a scheme and artifice to defraud, and to obtain money and property by means of false and fraudulent pretenses, representations, and promises, and for

the purpose of executing such scheme and artifice to defraud, to knowingly transmit and cause to be transmitted by means of wire communication in interstate and foreign commerce, certain writings, signs, signals, pictures, and sounds, contrary to Title 18, United States Code, Section 1343.

Goal of the Conspiracy

3. The goal of the scheme was for SHAH, the Co-Conspirators, and others to unlawfully enrich themselves by fraudulently evading duties for shipments of jewelry from Turkey and India to the United States.

Manner and Means of the Conspiracy

4. It was part of the scheme that:

a. Certain jewelry suppliers with whom SHAH, the Co-Conspirators, and others transacted were located in Turkey and India. During the relevant period, if jewelry was shipped directly from Turkey or India to the United States, it would have been subject to an approximately 5.5% duty.

b. To avoid the duty, SHAH shipped and/or instructed co-conspirators, including Co-Conspirator-2, to ship goods from Turkey and India to one of SHAH's companies in South Korea.

c. At SHAH's instruction, SHAH's co-conspirators in South Korea changed the labels on the jewelry to state falsely that they were from South Korea instead of Turkey or India, and then shipped them to SHAH or his customers in the United States, thereby unlawfully evading the duty.

d. SHAH made and instructed his customers, including Co-Conspirator-2, to make fake invoices and packing lists to make it appear that SHAH's South Korean companies were ordering jewelry from Turkey or India, when in fact SHAH used his South Korean companies solely to avoid paying duties during the relevant period.

e. SHAH and his Co-Conspirators unlawfully evaded duties for approximately \$13.5 million of jewelry shipped from South Korea to the United States.

f. To communicate with the Co-Conspirators and others, SHAH used an internet-based messaging application, through which SHAH sent and received interstate and foreign wire communications in furtherance of the scheme.

g. SHAH knowingly caused a third-party shipping company to falsely respond to an inquiry from U.S. Customs and Border Protection concerning a shipment from Pani Trading to MKore. For example, the shipping company falsely stated that jewelry shipped to the United States had originated in South Korea.

h. SHAH received interstate and international wire transfers to receive payment for jewelry in furtherance of the conspiracy, including from the Co-Conspirators.

i. SHAH had meetings in New Jersey in furtherance of the conspiracy, including with Co-Conspirator-1.

In violation of Title 18, United States Code, Section 1349.

COUNT TWO

(Operation and Aiding and Abetting the Operation of an Unlicensed Money Transmitting Business)

1. The allegations in paragraphs 1, 3, and 4 of Count One of this Information are realleged here.

2. From in or around July 2020 through in or around November 2021, in Middlesex and Hudson Counties, in the District of New Jersey, and elsewhere, the defendant,

**MONISHKUMAR KIRANKUMAR DOSHI SHAH,
a/k/a “Monish Doshi Shah,”**

knowingly conducted, controlled, managed, supervised, directed, and owned all or part of an unlicensed money transmitting business, and aided and abetted the conduct, control, management, supervision, direction, and ownership of such a money transmitting business, which business affected interstate and foreign commerce, and: (a) was a business operated without an appropriate money transmitting license in a state where such operation is punishable as a misdemeanor or a felony under state law, that is, New York and New Jersey; and (b) was a business required to register with the Financial Crimes Enforcement Network (“FinCEN”), an agency of the United States government, pursuant to Section 5330 of Title 31, United States Code.

In violation of Title 18, United State Code, Sections 1960(a), (b)(1)(A), and (b)(1)(B), and Section 2.

FORFEITURE ALLEGATION AS TO COUNT ONE

Upon conviction of the wire fraud conspiracy offense charged in Count One of this Information, defendant **MONISHKUMAR KIRANKUMAR DOSHI SHAH, a/k/a “Monish Doshi Shah,”** shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), any property constituting, or derived from, proceeds SHAH obtained directly or indirectly, as the result of such offense.

FORFEITURE ALLEGATION AS TO COUNT TWO


Upon conviction of the unlicensed money transmitting offense charged in Count Two of this Information, defendant **MONISHKUMAR KIRANKUMAR DOSHI SHAH, a/k/a “Monish Doshi Shah,”** shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(1), all property, real and personal, involved in such offense, and all property traceable to such property.

SUBSTITUTE ASSETS PROVISION
(Applicable to All Forfeiture Provisions)

If any of the property described above, 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,

the United States shall be entitled, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c) and Title 18, United States Code, Section 982(b), to forfeiture of any other property of the defendant up to the value of the above-described forfeitable property.



PHILIP R. SELLINGER
United States Attorney

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**United States District Court
District of New Jersey**

UNITED STATES OF AMERICA

v.

**MONISHKUMAR KIRANKUMAR DOSHI SHAH,
a/k/a “Monish Doshi Shah”**

INFORMATION FOR

**18 U.S.C. § 1349
18 U.S.C. §§ 1960(a), (b)(1)(A), and (b)(1)(B)
18 U.S.C. § 2**

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