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UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Criminal No. 17- 308- PGS
 :
 v. : 18 U.S.C. § 1952(a)(3)
 : and § 2
 NARESH RANE, :
 a/k/a "Raj Rane" :

INDICTMENT

The Grand Jury in and for the District of New Jersey,
sitting in Newark, charges:

1. At all times relevant to Counts 1 to 7 of this
Indictment:

A. Defendant NARESH RANE, a/k/a "Raj Rane," (defendant
"RANE") operated Axiom Healthcare Academy, a purported school
based in North Bergen, New Jersey offering classes in massage
therapy training.

B. Defendant RANE held himself out as a businessman
who, as the owner of Axiom Healthcare Academy, for a fee of
between \$1,000 and \$2,600, could provide a massage therapy
training certificate and a fake transcript listing the classes
taken and grades earned to anyone who wished to obtain a massage
license within the State of New Jersey without receiving the
required training. In addition to providing these documents,
defendant RANE held himself out as being willing to submit these
fraudulent documents to the New Jersey Board of Nursing, Massage

Bodywork and Somatic Therapy based in Newark, New Jersey on behalf of his clients.

C. Defendant RANE created numerous fraudulent massage therapy training certificates and transcripts containing false information, including, but not limited to, dates of training, hours of training, classes taken and grades earned.

D. Defendant RANE provided fraudulent massage therapy training certificates and transcripts to workers at certain massage parlors in New Jersey knowing that these documents would be used to facilitate the prostitution business. Such false documents facilitated and promoted the prostitution business by enabling the workers to obtain massage licenses from the State of New Jersey, which could be displayed at massage parlors offering prostitution services and could create the appearance of legitimate commercial activity.

2. There was another individual ("Individual 1") who began cooperating with federal law enforcement in 2013. Individual 1 also produced fraudulent massage therapy training certificates and transcripts which he sold to workers at massage parlors to facilitate their prostitution activities.

3. On or about October 4, 2013, in Bergen County, defendant RANE met with Individual 1, at which time Individual 1 informed defendant RANE that, although Individual 1 believed that he would not be able to procure massage licenses from the

State of New Jersey in the future through the submission of his own fraudulent massage therapy training certificates, "I don't want to walk away from the business." Defendant RANE informed Individual 1 that "definitely I want some business." Defendant RANE also informed Individual 1 that RANE had been charging \$2,600 for the fraudulent massage therapy training certificates and transcripts that RANE had been producing. Defendant RANE suggested that they could charge \$2,000 for the fraudulent massage therapy training certificates that RANE would produce on behalf of customers referred to RANE by Individual 1 and that RANE would retain \$1,300 of this amount and give the remainder to Individual 1.

4. On or about November 26, 2013, in Middlesex County, defendant RANE met with Individual 1, at which time RANE accepted \$1,100 in cash from Individual 1 in exchange for providing a fraudulent massage therapy training certificate from Axiom Healthcare Academy and signed by defendant RANE in the name of an individual hereinafter referred to as Worker 1 along with an accompanying fraudulent transcript setting forth the classes purportedly taken by Worker 1. Defendant RANE was informed that Worker 1 performed prostitution services.

5. On or about December 17, 2013, in Bergen County, defendant RANE met with Individual 1 and accepted \$1,100 in cash from Individual 1 in exchange for fraudulent massage training therapy certificates and transcripts for four individuals

hereinafter referred to as Worker 2, Worker 3, Worker 4 and Worker 5 which falsely represented that each of the four workers had completed 720 hours of training with Axiom Healthcare Academy. Defendant RANE was informed that all four workers for whom he was producing fraudulent massage therapy training certificates engaged in prostitution services.

6. On or about December 19, 2013, defendant RANE sent four separate e-mails to Individual 1. Each e-mail contained a fraudulent massage therapy training certificate and transcript for Workers 2, 3, 4 and 5 falsely representing that each had completed 720 hours of required training at Axiom Healthcare Academy. Each e-mail attachment also included a cover letter from Axiom Healthcare Academy addressed to the "New Jersey Board of Nursing, Massage, Bodywork and Somatic Therapy" in Newark, New Jersey and signed by defendant RANE. Each cover letter stated that it was "submitted by Axiom Healthcare Academy in support of the below mentioned applicant," after which the designated individual was named.

7. On or about January 21, 2014, in Bergen County, defendant RANE met with Individual 1. Defendant RANE accepted \$1,100 in cash in exchange for preparing a fraudulent massage therapy training certificate and transcript in the name of an individual hereinafter referred to as Worker 6. Defendant RANE was informed that the applicants for whom he was preparing the fraudulent massage therapy training certificates and transcripts

were engaged in prostitution services.

8. On or about February 24, 2014, in Middlesex County, defendant NARESH RANE met with Individual 1, at which time defendant RANE accepted approximately \$1,100 in cash in exchange for producing fraudulent massage therapy training certificates in the names of two individuals hereinafter referred to as Worker 7 and Worker 8.

9. On or about March 12, 2014, in Middlesex County, defendant RANE met with Individual 1. During the meeting, defendant RANE accepted \$1,700 in cash in exchange for producing two fraudulent massage therapy training certificates with accompanying transcripts in the names of two individuals hereinafter referred to as Worker 9 and Worker 10. Defendant RANE was informed that both Worker 9 and Worker 10 performed prostitution services.

10. On or about the following dates, in the District of New Jersey and elsewhere, defendant

NARESH RANE,
a/k/a "Raj Rane,"

did knowingly and intentionally use and cause the use of facilities in interstate commerce with the intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of an unlawful activity - namely, the business of prostitution, contrary to N.J. Stat. 2C:34-1(b), and thereafter performed and attempted to perform an act to promote, manage, establish, carry on, and

facilitate the promotion, management, establishment and carrying on of the unlawful activity, as set forth below:

COUNT	USE OF INTERSTATE FACILITY	SUBSEQUENT ACTS
1	<p>On or about November 14, 2013, in Fulton County, in the Northern District of Georgia, at approximately 3:32 p.m., defendant NARESH RANE received an e-mail, that had been transmitted via an out-of-state server, from Individual 1, in the District of New Jersey, wherein Individual 1 wrote "[p]lease see attached information regarding the massage training certificate," and to which was attached another e-mail with personal information pertaining to Worker 1. Individual 1 asked RANE to "[p]lease forward a PDF so I can show her and make sure it is correct." At approximately 3:36 p.m. on November 14, 2013, defendant RANE replied via e-mail that "I am in Atlanta till Saturday late evening I will take care of this assignment Sunday morning."</p>	<p>(A) On or about November 18, 2013, in Bergen County, New Jersey, defendant NARESH RANE created a Certificate falsely claiming that Worker 1 "[h]as successfully completed 720 hours course [sic] in Massage Therapy With Anatomy and Physiology" offered by Axiom Healthcare Academy, and signed by defendant NARESH RANE, knowing that Worker 1 had not completed such training and was engaged in prostitution activities.</p> <p>(B) On or about November 18, 2013, in Bergen County, New Jersey, defendant NARESH RANE created a fraudulent transcript for Worker 1 reflecting the number of hours of training purportedly received by Worker 1 in specified categories of massage training, and setting forth the grades purportedly awarded to Worker 1 for her participation in this training.</p> <p>(C) On or about November 18, 2013, in Bergen County, New Jersey, defendant NARESH RANE created a cover letter from "Axiom Healthcare Academy," captioned "Re; Letter in Support of</p>

<p>1 con'd</p>		<p>application of massage therapy graduates of Axiom Healthcare Academy," and signed by defendant NARESH RANE. The letter, which was addressed to the New Jersey Board of Nursing, Massage, Bodywork and Somatic Therapy," in Newark, New Jersey, stated that "[t]his letter is submitted by Axiom Healthcare Academy in support of the below mentioned applicant," after which the name of Worker 1 was listed.</p>
<p>2</p>	<p>On or about November 18, 2013, in Bergen County, in the District of New Jersey, at approximately 11:46 a.m., defendant NARESH RANE sent an e-mail to Individual 1, that had been transmitted via an out-of-state server, captioned "New student." Attached to this e-mail was (1) a Certificate falsely claiming that Worker 1 "[h]as successfully completed 720 hours course [sic] in Massage Therapy With Anatomy and Physiology" offered by Axiom Healthcare Academy, and signed by defendant NARESH RANE; (2) a fraudulent transcript for Worker 1 reflecting the number of hours of training purportedly received by Worker 1 in specified categories of massage training, and setting</p>	<p>On or about November 26, 2013, in Middlesex County, New Jersey, defendant NARESH RANE accepted approximately \$1,100 in cash from Individual 1 in exchange for the fraudulent massage therapy training certificate and corresponding transcript in the name of Worker 1 knowing that the purpose of these documents was to facilitate the prostitution activities of Worker 1.</p>

<p>2 con'd</p>	<p>forth the grades awarded to Worker 1 for her participation in this training; and (3) a cover letter from "Axiom Healthcare Academy," captioned "Re; Letter in Support of application of massage therapy graduates of Axiom Healthcare Academy," and signed by defendant NARESH RANE. The letter, which was addressed to the New Jersey Board of Nursing, Massage, Bodywork and Somatic Therapy," in Newark, New Jersey, stated that "[t]his letter is submitted by Axiom Healthcare Academy in support of the below mentioned applicant," after which the name of Worker 1 was listed.</p>	
<p>3</p>	<p>On or about November 15, 2013, in Bergen County, in the District of New Jersey, at approximately 11:46 a.m., defendant NARESH RANE received an e-mail from Individual 1, that had been transmitted via an out-of-state server, captioned "Four students' information." Individual 1 wrote that "[t]hese are from another source. How much do I owe you for this. . . . Please email me the PDF copies so I can show him." Attached to this email was another e-mail</p>	<p>(A) On or about December 17, 2013, in Bergen County, in the District of New Jersey, defendant NARESH RANE met with Individual 1 at which time defendant RANE accepted \$1,100 in cash to produce fraudulent massage therapy training certificates and corresponding transcripts for Worker 2, Worker 3, Worker 4 and Worker 5 knowing that these four women were engaged in prostitution activities.</p> <p>(B) On or about December 19, 2013, at approximately 11:55 a.m., defendant NARESH RANE sent an e-mail captioned</p>

<p>3 con'd</p>	<p>listing the names of Worker 2, Worker 3, Worker 4 and Worker 5 along with their home and work addresses and dates of birth.</p>	<p>"Std" to Individual 1. Attached to this e-mail was (1) a massage therapy training certificate from Axiom Healthcare Academy and signed by defendant NARESH RANE in the name of Worker 2 falsely stating that she had "successfully completed 720 hours course [sic] in Massage Therapy With Anatomy and Physiology;" (2) a fraudulent transcript from Axiom Healthcare Associates in the name of Worker 2 purportedly showing the courses taken and the grades received by Worker 2; and (3) a cover letter with the Axiom Healthcare Academy's letterhead signed by defendant NARESH RANE captioned "Re; Letter in Support of application of massage therapy graduates of Axiom Healthcare Academy" in support of Worker 2.</p> <p>(C) On or about December 19, 2013, at approximately 11:58 a.m., defendant NARESH RANE sent an e-mail captioned "Std" to Individual 1. Attached to this e-mail was (1) a massage therapy training certificate from Axiom Healthcare Academy and signed by defendant NARESH RANE in the name of Worker 3 falsely stating that she had "successfully completed 720 hours course in Massage Therapy With Anatomy and Physiology;" (2) a fraudulent transcript from Axiom Healthcare Associates</p>
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<p>3 con'd</p>	<p>in the name of Worker 3 showing the purported courses taken and the grades received by Worker 3; and (3) a cover letter with the Axiom Healthcare Academy's letterhead signed by defendant NARESH RANE captioned "Re; Letter in Support of application of massage therapy graduates of Axiom Healthcare Academy" in support of Worker 3.</p> <p>(D) On or about December 19, 2013, at approximately 12:01 p.m., defendant NARESH RANE sent an e-mail captioned "Std" to Individual 1. Attached to this e-mail was (1) a massage therapy training certificate from Axiom Healthcare Academy and signed by defendant NARESH RANE in the name of Worker 4 falsely stating that she had "successfully completed 720 hours course in Massage Therapy With Anatomy and Physiology;" (2) a fraudulent transcript from Axiom Healthcare Associates in the name of Worker 4 showing the purported courses taken and the grades received by Worker 4; and (3) a cover letter with the Axiom Healthcare Academy's letterhead signed by defendant NARESH RANE captioned "Re; Letter in Support of application of massage therapy graduates of Axiom Healthcare Academy" in support of Worker 4.</p>
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<p>3 con'd</p>		<p>(E) On or about December 19, 2013, at approximately 12:08 p.m., defendant NARESH RANE sent an e-mail captioned "Std" to Individual 1. Attached to this e-mail was (1) a massage therapy training certificate from Axiom Healthcare Academy and signed by defendant NARESH RANE in the name of Worker 5 falsely stating that she had "successfully completed 720 hours course in Massage Therapy With Anatomy and Physiology;" (2) a fraudulent transcript from Axiom Healthcare Associates in the name of Worker 5 showing the purported courses taken and the grades received by Worker 5; and (3) a cover letter with the Axiom Healthcare Academy's letterhead signed by defendant NARESH RANE captioned "Re; Letter in Support of application of massage therapy graduates of Axiom Healthcare Academy" in support of Worker 5.</p>
<p>4</p>	<p>On or about January 17, 2014, in Bergen County, in the District of New Jersey, at approximately 5:19 p.m., defendant NARESH RANE received an e-mail from Individual 1, that had been transmitted via an out-of-state server, stating "[w]here are you Tuesday afternoon . . . She wants very good grades." This e-mail included an</p>	<p>On or about January 20, 2014, at approximately 2:12 p.m., defendant NARESH RANE sent an e-mail with the first name of Worker 6 in the caption to Individual 1. Attached to this e-mail was (1) a massage therapy training certificate from Axiom Healthcare Academy signed by defendant NARESH RANE in the name of Worker 6 falsely stating that she had "successfully completed 720</p>

	<p>e-mail listing the name of Worker 6 along with an address and a place of business in Jersey City, New Jersey. At approximately 5:34 p.m. on January 17, 2014, defendant NARESH RANE replied in an e-mail to Individual 1 "[g]ot it I am home till 930 Will go to office and be there till 1 pm."</p>	<p>hours course in Massage Therapy With Anatomy and Physiology;" (2) a fraudulent transcript from Axiom Healthcare Associates in the name of Worker 6 showing the purported courses taken and the grades received by Worker 6; and (3) a cover letter with the Axiom Healthcare Academy's letterhead signed by defendant NARESH RANE captioned "Re; Letter in Support of application of massage therapy graduates of Axiom Healthcare Academy" in support of Worker 6 knowing that she was engaged in prostitution activities.</p>
<p>5</p>	<p>On or about January 20, 2014, at approximately 2:12 p.m., in Bergen County, in the District of New Jersey, defendant NARESH RANE sent an e-mail, that had been transmitted via an out-of-state server, to Individual 1 in Bergen County. Attached to this e-mail was (1) a massage therapy training certificate from Axiom Healthcare Academy signed by defendant NARESH RANE in the name of Worker 6 falsely stating that she had "successfully completed 720 hours course in Massage Therapy With Anatomy and Physiology;" (2) a fraudulent transcript from Axiom Healthcare Associates in</p>	<p>On or about January 21, 2014, in Bergen County, in the District of New Jersey, defendant RANE met with Individual 1 at which time RANE accepted approximately \$1,100 in cash for producing the fraudulent massage therapy training certificate and corresponding transcript for Worker 6 knowing that she was engaged in prostitution activities.</p>

5 con'd	the name of Worker 6 showing the purported courses taken and the grades received by Worker 6; and (3) a cover letter with the Axiom Healthcare Academy's letterhead signed by defendant NARESH RANE captioned "Re; Letter in Support of application of massage therapy graduates of Axiom Healthcare Academy" in support of Worker 6.	
6	On or about February 5, 2014, in Bergen County, in the District of New Jersey, at approximately 5:19 p.m., defendant NARESH RANE received an e-mail from Individual 1, that had been transmitted via an out-of-state server, stating that "[t]hese are two who went to" Individual 1's fictitious massage training school "and need retraining certificates effective this month." Individual 1 then listed the names of Worker 7 and Worker 8 as well as an address for both.	On or about February 24, 2014, in Middlesex County, in the District of New Jersey, defendant NARESH RANE met with Individual 1 at which time RANE accepted \$1,100 in cash in exchange for producing the fraudulent massage therapy training certificates and corresponding transcripts for Worker 7 and Worker 8 knowing that these women were engaged in prostitution activities.
7	On or about March 12, 2014, at approximately 8:26 a.m., in Bergen County, in the District of New Jersey, defendant NARESH RANE received an e-mail from Individual 1, that had been transmitted via an out-	(A) On or about March 12, 2014, at approximately 1:33 p.m., defendant NARESH RANE sent an e-mail to Individual 1 which attached massage therapy training certificates from Axiom Healthcare Academy and signed by defendant NARESH

7 con'd	of-state server, stating "[a]t 1. Will bring 1700 payment for last week and two renewals." The e-mail then listed the names of Worker 9 and Worker 10 to be placed on the massage therapy training renewal certificates to be produced by defendant RANE. Individual 1 added that "I have the money so please send me the PDF so I can show them . . ." At approximately 8:29 a.m. on or about March 12, 2014, defendant RANE sent a return e-mail to Individual 1 stating "I will send PDF at about 11. . . Naresh."	RANE in the names of Worker 9 and Worker 10 knowing that these women were engaged in prostitution activities. (B) On or about March 12, 2014, in Middlesex County, in the District of New Jersey, defendant NARESH RANE accepted approximately \$1,700 in cash from Individual 1 in exchange for producing the fraudulent massage therapy training certificates in the names of Worker 9 and Worker 10.
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All in violation of Title 18, United States Code,
Sections 1952(a)(3) and 2.

FORFEITURE ALLEGATION

As a result of committing the aforementioned offenses in violation of Title 18, United States Code, Sections 1952(a)(3) charged in Counts 1 to 7 of this Indictment, defendant NARESH RANE 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, all property, real and personal, that constitutes and is derived from proceeds traceable to the commission of the above offenses, including, but not limited to a money judgment in the amount of \$6,100 in United States currency, in that such sum constitutes and is derived, directly and indirectly, from proceeds traceable to the commission of the offenses.

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

- (1) cannot be located upon exercise of due diligence;
- (2) has been transferred or sold to, or deposited with, a third party;
- (3) has been placed beyond the jurisdiction of the Court;
- (4) has been substantially diminished in value; or
- (5) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), to seek forfeiture of any other property of defendant

RANE up to the value of the above forfeitable property.

Pursuant to Title 18, United States Code, Section
981(a)(1)(C) and Title 28, United States Code, Section 2461.

A TRUE BILL

FOREPERSON



WILLIAM E. FITZPATRICK
Acting United States Attorney

CASE NUMBER: 17-CR-308-PGS

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

UNITED STATES OF AMERICA

v.

**NARESH RANE,
a/k/a "Raj Rane"**

INDICTMENT FOR

Title 18, United States Code,
Section 1952(a)(3) and Section 2

WILLIAM E. FITZPATRICK
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