

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

UNITED STATES OF AMERICA : Hon.  
 :  
 v. : Crim. No. 23-  
 :  
 HARSHA SAHNI : 8 U.S.C. § 1324  
 : 26 U.S.C. § 7206(1)  
 :

**INFORMATION**

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 Conceal and Harbor Aliens)**

1. At all times relevant to this Information:
  - a. Harsha Sahni was a resident of Tinton Falls, New Jersey.
  - b. Victim-1 and Victim-2 were foreign nationals from India. Victim-1 and Victim-2 were recruited by SAHNI to work for SAHNI and her family in their homes in New Jersey.
2. Starting in or around 2013, and continuing through in or around August 2021, in Monmouth County, in the District of New Jersey, and elsewhere, the defendant,

**HARSHA SAHNI,**

knowing that Victim-1 and Victim-2 had come to, entered, and remained in the United States in violation of law, conspired with others to conceal, harbor, and shield from detection Victim-1 and Victim-2, for the purpose of SAHNI's and her

coconspirators' private financial gain, contrary to Title 8, United States Code, Sections 1324(a)(1)(A)(iii) and (a)(1)(B)(i).

### **Goal of the Conspiracy**

3. It was the goal of the conspiracy for SAHNI and her family members (the "Coconspirators") to conceal and harbor Victim-1 and Victim-2 in the homes of the Coconspirators while SAHNI and her Coconspirators reaped the private financial benefit of Victim-1's and Victim-2's labor.

### **Manner and Means of the Conspiracy**

4. It was part of the conspiracy that SAHNI instructed Victim-1 and Victim-2 to lie during their visa interviews and state falsely that Victim-1 and Victim-2 were related to SAHNI.

5. It was also part of the conspiracy that SAHNI made living arrangements for Victim-1 and Victim-2 in exchange for their labor, which SAHNI and her Coconspirators procured for their private financial gain.

6. It was also part of the conspiracy that SAHNI caused Victim-1 and Victim-2 to believe that they would be arrested and deported if they interacted with law enforcement.

7. It was also part of the conspiracy that SAHNI, in return for Victim-1's and Victim-2's labor, sent money to the victims' families in India, in furtherance of SAHNI's and the Coconspirators' private financial gain.

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

**COUNT TWO**  
**(Filing a Fraudulent Tax Return)**

1. Paragraph One of Count One is realleged here.

2. SAHNI signed and caused to be filed with the Internal Revenue Service a U.S. Individual Income Tax Return, Form 1040, for the tax year 2019 (the “Income Tax Return”) that contained a written declaration that the Income Tax Return was filed under penalty of perjury. The Income Tax Return was not true and correct as to every material matter, as SAHNI well knew, in that the Income Tax Return did not include a Form 1040, Schedule H, Household Employment Taxes.

3. On or about December 7, 2020, in the District of New Jersey, the defendant,

**HARSHA SAHNI,**

did willfully make and subscribe the Income Tax Return, which was verified by a written declaration that it was made under the penalties of perjury and which she did not believe to be true and correct as to every material matter.

In violation of Title 26, United States Code, Section 7206(1).

**FORFEITURE ALLEGATION AS TO COUNT ONE**

As a result of committing the illegal harboring offense charged in Count One of this Information, the defendant,

**HARSHA SAHNI,**

shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(6)(A)(ii) any and all property constituting or derived from any proceeds the defendant obtained directly or indirectly as a result of the said violation, and any and all property used or intended to be used in any manner or part to commit and to facilitate the commission of the violation alleged in Count One of this Information.

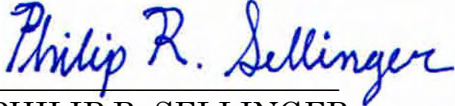
**SUBSTITUTE ASSETS PROVISION**

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,

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) and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of

such defendant up to the value of the forfeitable property described above.

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PHILIP R. SELLINGER  
United States Attorney

CASE NUMBER: 23-\_\_\_\_\_

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

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**UNITED STATES OF AMERICA**

v.

**HARSHA SAHNI**

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**INFORMATION FOR**

**8 U.S.C. § 1324  
26 U.S.C. § 7206(1)**

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**PHILIP R. SELLINGER  
UNITED STATES ATTORNEY  
FOR THE DISTRICT OF NEW JERSEY**

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**JAMIE H. SOLANO  
ASSISTANT U.S. ATTORNEY  
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