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UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

AUG 28 2017

AT 8:30 \_\_\_\_\_ M  
WILLIAM T. WALSH, CLERK

Hon. *Michael A. Shipp*

UNITED STATES OF AMERICA

Crim. No. 17- 343

v.

18 U.S.C § 371 & 2

KHAMRAJ LALL

18 U.S.C. § 1956(h)

21 U.S.C. §§ 846 & 963

**INDICTMENT**

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

**COUNT ONE**

(Conspiracy to Launder Money)

From in or about April 2011 through in or about November 2014, in  
Passaic County, in the District of New Jersey and elsewhere, defendant

KHAMRAJ LALL

did knowingly and intentionally conspire and agree with others to commit an  
offense against the United States, namely:

- (1) to knowingly conduct and attempt to conduct financial transactions affecting interstate and foreign commerce, which in fact involved the proceeds of a specified unlawful activity, that is, the manufacture, importation, and distribution of a controlled substance, with the intent to promote the carrying on of such specified unlawful activity, knowing that the property involved in the financial transaction represented the proceeds of some form of unlawful activity, contrary to Title 18, United States Code, Section 1956(a)(1)(A)(i);

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P.M.*

(2) to knowingly conduct and attempt to conduct financial transactions affecting interstate and foreign commerce, which in fact involved the proceeds of specified unlawful activity, that is, the manufacture, importation, and distribution of a controlled substance, knowing that the transactions were designed in whole or in part to avoid a transaction reporting requirement under Federal law, that is, the currency transaction reporting ("CTR") requirement, as set forth in Title 31, United States Code, Section 5313(a) and the regulations promulgated thereunder, knowing that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, contrary to Title 18, United States Code, Section 1956(a)(1)(B)(ii); and

(3) to transport, transmit and transfer and attempt to transport, transmit and transfer a monetary instrument and funds from a place in the United States to and through a place outside the United States with the intent to promote the carrying on of specified unlawful activity, that is, the manufacture, importation, and distribution of a controlled substance, contrary to Title 18, United States Code, Section 1956(a)(2)(A).

All in violation of Title 18, United States Code, Section 1956(h), and Title 18, United States Code, Section 2.

**COUNT TWO**

(Conspiracy to Structure Funds)

From in or about April 2011 through in or about November 2014, in Passaic County, in the District of New Jersey and elsewhere, defendant

**KHAMRAJ LALL**

did knowingly and intentionally conspire and agree with others to commit an offense against the United States, namely:

(1) for the purpose of evading the reporting requirements of Title 31, United States Code, Section 5313(a), and the regulations issued thereunder, to cause a domestic financial institution to fail to file a report required under Title 31, United States Code, Sections 5313(a) and the regulations issued thereunder, contrary to Title 31, United States Code, Section 5324(a)(1); and

(2) for the purpose of evading the reporting requirements of Title 31, United States Code, Section 5313(a), and the regulations issued thereunder, to structure and assist in structuring transactions with domestic financial institutions by causing United States currency to be deposited in amounts not exceeding \$10,000, contrary to Title 31, United States Code, Section 5324(a)(3).

All in violation of Title 18, United States Code, Section 371.

**COUNT THREE**  
(Conspiracy to Import Cocaine)

From in or about April 2011 through in or about November 2014, in Bergen County, in the District of New Jersey and elsewhere, defendant

KHAMRAJ LALL

did knowingly and intentionally conspire and agree with others to import into the United States from a place outside thereof, namely, the Republic of Guyana and elsewhere, 5 kilograms or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, contrary to Title 21, United States Code, Sections 952(a) and 960(b)(1)(B).

In violation of Title 21, United States Code, Section 963.

**COUNT FOUR**

(Conspiracy to Distribute Cocaine)

From in or about April 2011 through in or about November 2014, in Passaic County, in the District of New Jersey and elsewhere, defendant

KHAMRAJ LALL

did knowingly and intentionally conspire with others to distribute and possess with intent to distribute 5 kilograms or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, contrary to Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

In violation of Title 21, United States Code, Section 846.

**Forfeiture Allegation as to Count One**

1. The allegations contained in all paragraphs of Counts One through Four of this Indictment are incorporated by reference as if set forth in full herein for the purpose of noticing forfeitures.

2. The United States hereby gives notice to the defendant that, upon conviction of the offenses charged in Count One of this Indictment, the government will seek forfeiture, in accordance with Title 18, United States Code, Section 982(a)(1), of any property, real or personal, involved in the offense in violation of Title 18, United States Code, Section 1956(h), or any property traceable to such property, including, but not limited to, all of the defendant's right, title, or interest in the following:

**A. Real Property**

- 1) All that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at 104 Coventry Way, Ringwood, New Jersey, more particularly described as: Block 752, Lot No. 46, Assessor's Parcel No. 11-00752-0000-00046, being the same property that was described in a Grant Deed recorded on April 12, 2011 as Document No. 17550 in Book 2041, Page 182 in the Passaic County Clerk's Office, Passaic County, New Jersey;
- 2) All that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at 1551 NE 161st Place, Citra, Florida, more particularly described as: Block No. 12, Lot No. 25, Assessor's Parcel No. 0756-012-007, as recorded in Plat Book C, Page 24, being the same property that was described in a warranty deed recorded on October 16, 2013 as Document No. 2013106570 in Book 5942, Pages 1597-1598 of the public records of Marion County, Florida;
- 3) All that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at 170 Neelytown Road, Hamptonburgh, New

York, more particularly described as: Block 1, Lot No. 8, Assessor's Parcel No. 333489-001-000-0001—008.320-0000 being the same property that was described in a Bargain and Sale Deed recorded on May 12, 2014, Document No. 40387 in Book 13749, Page 777, of the public records of Orange County, New York;

- 4) All that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at 417 Bedlington Ct, Kissimmee, FL 34758, more particularly described as Lot 5, Block 1295, Village 2, Neighborhood 3, Poinciana Subdivision, according to the plat thereof recorded in Plat Book 3 at Page(s) 118 of the Public Records of Osceola County, Florida, more particularly parcel number 25-26-28-6112-1295-0050; and
- 5) Any and all assets and rights of Exec Jet Club, LLC, and all assets and rights purchased pursuant to an Asset Purchase Agreement entered between Exec Jet Club, LLC and RD Air Services, LLC, dated November 1, 2011, including but not limited to all valuable assets, corporate real and personal property, which includes all interests to any leasehold and rents received by Exec Jet Club, LLC, including interests in and to certain lease agreements between Exec Jet Club, LLC, and the Alachua County Regional Airport Authority, particularly having an address of 4050 NE 45th Ave. Gainesville, Florida and 4440 Northeast 41st Terrace, Gainesville, Florida, and interests Exec Jet Club, LLC has to all aircraft, hangars, and buildings attached thereto, and any valuable Exec Jet Club, LLC equipment contained at that location.

## **B. Conveyances**

- 1) One 1988 Fixed Wing Multi-Engine Aircraft, Israel Aircraft Industries, Model Number 1124, Serial Number 441, FAA Registration N822QL;
- 2) One 1985 Fixed Wing Multi-Engine Aircraft, Canadair Ltd., Model Number CL-600-2A12, Serial Number 3042, FAA Registration N923SL (currently displaying former FAA registration N951RM); and
- 3) One 2013 Lexus GX Wagon, Vehicle Identification Number JTJBM7FX7D5053147.

**C. Cash**

A total of approximately \$442,743.59 in United States currency  
comprised of:

- 1) Approximately \$17,152.90 formerly contained in the Wells Fargo Bank personal checking account ending in 9880, held in the name of defendant KHAMRAJ LALL;
- 2) Approximately \$38,335.48 formerly contained in the Wells Fargo Bank personal checking account ending in 2389, held in the name of defendant KHAMRAJ LALL and a relative of KHAMRAJ LALL ("Individual 1");
- 3) Approximately \$42,584.37 formerly contained in the Wells Fargo Bank personal checking account ending in 6503, held in the name of Individual 1;
- 4) Approximately \$43,394.71 formerly contained in the Wells Fargo Bank UTMA account ending in 9396, held in the name of defendant KHAMRAJ LALL, custodian;
- 5) Approximately \$44,419.35 formerly contained in the Wells Fargo Bank UTMA account ending in 9464, held in the name of defendant KHAMRAJ LALL, custodian;
- 6) Approximately \$43,455.72 formerly contained in the Wells Fargo Bank UTMA account ending in 9477, held in the name of defendant KHAMRAJ LALL, custodian;
- 7) Approximately \$28,929.07 formerly contained in the Wells Fargo business checking account ending in 2364, held in the name of Exec Jet Club, LLC;
- 8) Approximately \$44,090.82 formerly contained in the Wells Fargo business checking account ending in 2398, held in the name of Exec Jet Club, LLC;
- 9) Approximately \$55,846.65 formerly contained in the Wells Fargo business checking account ending in 7493, held in the name of Exec Jet Sales, LLC;
- 10) Approximately \$68,703.49 formerly contained in the Wells Fargo Bank business checking account ending in 5891, held in the name of Kaylees Investments, LLC;



- 11) Approximately \$1,822.31 contained in the Citibank personal checking account ending in 6245, held in the name of a relative of KHAMRAJ LALL ("Individual 2");
- 12) Approximately \$5,318.92 contained in the Citibank personal savings account ending in 8444, held in the name of Individual 2;
- 13) Approximately \$4,689.80 contained in the JPMorgan Chase Bank personal checking account ending in 5174, held jointly in the name of Individual 2 and a relative of Individual 2; and
- 14) Approximately \$4,000.00 contained in the JPMorgan Chase Bank personal savings account ending in 1215, held in the name of Individual 2.

(herein after referred to collectively as the "Specific Properties").

**Forfeiture Allegation as to Count Two**

1. The allegations contained in all paragraphs of Counts One through Four of this Indictment are incorporated by reference as if set forth in full herein for the purpose of noticing forfeitures.

2. Pursuant to Title 31, United States Code, Section 5317(c)(1), upon conviction of violating Title 18, United States Code, Section 371, and Title 31, United States Code, Section 5324, as charged in Count Two of this Indictment, defendant

KHAMRAJ LALL

shall forfeit to the United States of America all property, real or personal, involved in the offense charged in Count Two, and any property traceable thereto, including, but not limited to, all of the defendant's right, title, or interest in the Specified Properties.

**Forfeiture Allegation as to Counts Three and Four**

1. The allegations contained in all paragraphs of Counts One through Four of this Indictment are incorporated by reference as if set forth in full herein for the purpose of noticing forfeitures.

2. Pursuant to Title 21, United States Code, Section 853, upon conviction of violating Title 21, United States Code, Sections 846 and 960, as charged in Counts Three and Four of this Indictment, defendant

KHAMRAJ LALL

shall forfeit to the United States of America any and all property constituting or derived from any proceeds the person obtained, directly or indirectly, as the result of the violation charged in Counts Three and Four of the Indictment, and any of the defendant's property used or intended to be used, in any manner or part, to commit, and to facilitate the commission of, the violations charged in Counts Three and Four of the Indictment, including, but not limited to, all of the defendant's right, title, or interest in the Specific Properties.

**Substitute Assets Provision**  
**(Applicable to All Forfeiture Allegations)**

1. If any of the property described above as being subject to forfeiture, as result of any act or omission of the defendant KHAMRAJ LALL, cannot be located upon the exercise of due diligence;

(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

it is the intention of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property.

A TRUE BILL

  
FOREPERSON

  
WILLIAM E. FITZPATRICK  
Acting United States Attorney

CASE NUMBER: 17-343 (MAS)

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

**UNITED STATES OF AMERICA**

v.

**KHAMRAJ LALL**

**INDICTMENT FOR**

**18 U.S.C § 371 & 2  
18 U.S.C. § 1956(h)  
21 U.S.C. §§ 846 & 963**

**A True Bill**

**Foreperson**

**WILLIAM E. FITZPATRICK**

**ACTING UNITED STATES ATTORNEY  
NEWARK, NEW JERSEY**

**JONATHAN M. PECK &  
MELISSA M. WANGENHEIM  
ASSISTANT U.S. ATTORNEYS  
973-645-2700**