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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

JUDGE GETTLEMAN

MAGISTRATE JUDGE FINNEGAN

UNITED STATES OF AMERICA )  
 )  
 v. )  
 )  
 ADNAN VADRIA, )  
 also known as "Andy," and )  
 UMAIR YASIN, )  
 also known as "Mike" )

No. :

**15CR 706**

Violations: Title 18, United States  
Code, Sections 371, 1956(h), and 2314

COUNT ONE

**FILED**

DEC 03 2015

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The SPECIAL JANUARY 2015 GRAND JURY charges:

THOMAS G. BRUTON  
CLERK, U.S. DISTRICT COURT

1. At times material to this indictment:

a. AU Electronics, Inc. ("AU") purchased electronic devices, including cell phones and tablet computers such as Apple iPhones, Apple iPads, Samsung Galaxy phones, and similar devices, which AU resold to customers in the United States and abroad. AU maintained locations in Lincolnwood, Bedford Park, and Oak Park, Illinois.

b. Defendant ADNAN VADRIA was the president of AU and co-managed its operations, including directing and supervising employees and arranging for electronic devices to be purchased, repackaged, shipped, and sold.

c. Defendant UMAIR YASIN was the director of AU and co-managed its operations, including directing and supervising employees and arranging for electronic devices to be purchased, repackaged, shipped, and sold.

d. "Credit muling" or "equipment gaming" was a fraudulent practice in which individuals entered into service contracts with wireless and

cellular service providers, such as Verizon and AT&T, for the purpose of obtaining electronic devices at a discounted rate, without the intention of fulfilling the terms of the contract, including making the monthly service payments as required.

2. Beginning no later than in or about 2011, and continuing until at least in or about September 2013, at Lincolnwood, in the Northern District of Illinois, Eastern Division, and elsewhere,

ADNAN VADRIA, also known as "Andy," and  
UMAIR YASIN, also known as "Mike,"

defendants herein, knowingly conspired with each other, and with others known and unknown to the Grand Jury, to transport, transmit, and transfer in interstate and foreign commerce goods and merchandise, namely, electronic devices, of the value of \$5,000 or more, knowing the same to have been stolen, converted, or taken by fraud, in violation of Title 18, United States Code, Section 2314.

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

3. It was part of the conspiracy that defendants ADNAN VADRIA and UMAIR YASIN, through AU, purchased and caused others to purchase electronic devices, including Apple iPhones, Apple iPads, Samsung Galaxy phones and other brands and models of cell phones and tablet computers, from individuals at AU's locations in Lincolnwood, Bedford Park, and Oak Park. As defendants VADRIA and YASIN knew, such electronic devices had been obtained by theft, conversion, and fraud, including by credit muling or electronic gaming, credit card fraud, and other fraudulent means.

4. It was further part of the conspiracy that defendants ADNAN VADRIA and UMAIR YASIN informed sellers of the types of electronic devices AU sought to purchase.

5. It was further part of the conspiracy that defendant UMAIR YASIN notified AU employees when certain sellers would be arriving at AU locations and the number and types of electronic devices the sellers intended to sell to AU.

6. It was further part of the conspiracy that defendants ADNAN VADRIA and UMAIR YASIN purchased and caused others to purchase stolen and fraudulently obtained electronic devices in sealed boxes, including at times approximately 50 iPhones during a single transaction, from sellers on a regular basis.

7. It was further part of the conspiracy that defendants ADNAN VADRIA and UMAIR YASIN instructed AU employees not to ask sellers how they had obtained the electronic devices.

8. It was further part of the conspiracy that defendants ADNAN VADRIA and UMAIR YASIN caused payments to be made to the sellers of stolen and fraudulently obtained electronic devices by means of cash, wire transfer, electronic funds transfer, and check.

9. It was further part of the conspiracy that defendants ADNAN VADRIA and UMAIR YASIN removed or caused others to remove the Subscriber Identity

Module (or "SIM") cards from the stolen and fraudulently obtained cell phones purchased by AU.

10. It was further part of the conspiracy that defendants ADNAN VADRIA and UMAIR YASIN packaged and assembled, and caused others to package and assemble, stolen and fraudulently obtained electronic devices for shipment from Illinois, via commercial carrier, to AU's customers located outside of Illinois, including customers located in Nevada, Hong Kong, and Dubai, the United Arab Emirates.

11. It was further part of the conspiracy that defendants ADNAN VADRIA and UMAIR YASIN instructed AU customers to pay for the electronic devices the customers had purchased by sending a wire transfer to an AU bank account controlled by defendant VADRIA.

12. It was further part of the conspiracy that defendants ADNAN VADRIA and UMAIR YASIN concealed, misrepresented, and hid and caused to be concealed, misrepresented, and hidden, the existence and purpose of the conspiracy and the acts done in furtherance of the conspiracy.

13. As a result of the conspiracy, between in or about 2011 and in or about September 2013, defendants ADNAN VADRIA and UMAIR YASIN, through AU, purchased stolen and fraudulently obtained electronic devices worth, in total, more than \$600,000, which devices were transferred, transmitted, and transported, via

commercial carrier, from Illinois to customers located outside of Illinois, including to customers located in Nevada, Hong Kong, and Dubai.

#### Overt Acts

14. In furtherance of this conspiracy, and to accomplish its objectives, defendants ADNAN VADRIA and UMAIR YASIN performed and caused to be performed the following overt acts, among others:

a. On or about September 11, 2012, AU purchased from Individual A approximately 33 iPads that had been stolen from a public school in Chicago, Illinois.

b. On or about September 17, 2012, defendant ADNAN VADRIA negotiated a price with an AU customer for the sale of the iPads that were stolen from the public school.

c. On or about September 17, 2012, defendant ADNAN VADRIA caused the iPads, which were stolen from the public school and had a value of more than \$5,000, to be shipped from Illinois to an AU customer located in Nevada.

d. On or about February 23, 2013, AU purchased from Individual B approximately 31 fraudulently obtained iPhones for approximately \$19,880.

e. On or about February 23, 2013, defendant ADNAN VADRIA caused the approximately 31 fraudulently obtained iPhones, which had been purchased from Individual B and had a value of more than \$5,000, to be shipped from Illinois to an AU customer located in Dubai.

f. On or about March 13, 2013, AU purchased from Individuals C and D approximately 10 iPhones for approximately \$1,605. Individuals C and D had stolen such phones from their employer, Commercial Carrier A.

g. On or about March 14, 2013, AU purchased from Individuals C and D approximately 12 iPhones for approximately for \$4,515. Individuals C and D had stolen such phones from their employer, Commercial Carrier A.

h. On or about March 25, 2013, AU purchased from Individual E approximately 60 fraudulently obtained iPhones for approximately \$37,300.

i. On or about March 26, 2013, defendant ADNAN VADRIA caused approximately 44 of the iPhones purchased from Individual E, which phones had a value of more than \$5,000, to be shipped from Illinois to an AU customer in Dubai.

j. On or about March 26, 2013, defendant ADNAN VADRIA caused approximately 11 of the iPhones purchased from Individual E to be shipped from Illinois to an AU customer in Hong Kong.

k. On or about March 30, 2013, AU purchased from Individual F approximately 31 fraudulently obtained iPhones for approximately \$22,000.

l. On or about April 1, 2013, defendant ADNAN VADRIA caused approximately 30 of the iPhones purchased from Individual F, which phones had a value of more than \$5,000, to be shipped from Illinois to an AU customer in Dubai.

m. On or about June 20, 2013, AU purchased approximately 19 purportedly stolen iPhones from an undercover law enforcement officer, who had posed as a Commercial Carrier A employee, and who had indicated to defendant UMAIR YASIN during the transaction that the phones were stolen.

n. On or about July 3, 2013, defendant UMAIR YASIN spoke with the undercover law enforcement officer by telephone to arrange for the purchase of additional electronic devices.

o. On or about August 7, 2013, defendant UMAIR YASIN spoke with the undercover law enforcement officer by telephone to arrange for the purchase of additional electronic devices.

p. On or about August 7, 2013, AU purchased approximately 11 purportedly stolen iPads from the undercover law enforcement officer.

q. On or about August 7, 2013, approximately 9 of the iPads AU purchased from the undercover law enforcement officer were shipped from Illinois to an AU customer located in Hong Kong.

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

**COUNT TWO**

The SPECIAL JANUARY 2015 GRAND JURY further charges:

On or about September 17, 2012, at Lincolnwood, in the Northern District of Illinois, Eastern Division, and elsewhere,

ADNAN VADRIA, also known as "Andy,"

defendant herein, transported, transmitted, and transferred in interstate and foreign commerce goods and merchandise, namely, electronic devices, which were shipped by commercial carrier from Illinois to Nevada, and which had a value of \$5,000 or more, knowing the same to have been stolen, converted, and taken by fraud;

In violation of Title 18, United States Code, Sections 2314 and 2.



COUNT THREE

The SPECIAL JANUARY 2015 GRAND JURY further charges:

1. Paragraphs 1 and 3 through 14 of Count One are incorporated here.
2. Beginning no later than in or about 2011, and continuing until at least in or about September 2013, at Lincolnwood, in the Northern District of Illinois, Eastern Division, and elsewhere,

ADNAN VADRIA, also known as "Andy" and  
UMAIR YASIN, also known as "Mike,"

defendants herein, did knowingly conspire with each other, and with others known and unknown to the Grand Jury:

a. to knowingly 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, and to a place in the United States from and through a place outside the United States, with the intent to promote the carrying on of a specified unlawful activity, namely, the interstate transportation of property that was stolen, converted, or taken by fraud, in violation of Title 18, United States Code, Section 1956(a)(2)(A); and

b. to knowingly engage and attempt to engage in a monetary transaction, in and affecting interstate commerce, in criminally derived property that was of a value greater than \$10,000, and was derived from specified unlawful activities, namely, the interstate transportation of property that was stolen,

converted or taken by fraud, in violation of Title 18, United States Code, Section 1957.

3. It was part of the conspiracy that, defendants ADNAN VADRIA and UMAIR YASIN caused payments, in amounts greater than \$10,000, to be made to the sellers of stolen and fraudulently obtained electronic devices in cash, and by wire transfer, electronic funds transfer, and check.

4. It was further part of the conspiracy that defendants ADNAN VADRIA and UMAIR YASIN instructed AU customers, including those in Hong Kong and Dubai, to provide payment from or through a place outside the United States to an AU bank account in the United States, which was controlled by defendant VADRIA.

5. It was further part of the conspiracy that, between on or about June 6, 2013, and on or about August 30, 2013, defendants ADNAN VADRIA and UMAIR YASIN caused AU to receive approximately \$8,000,000 into its bank account in the form of international wire transfers from AU customers located in Hong Kong and Dubai, which customers had purchased stolen and fraudulently obtained electronic devices from AU.

6. It was further part of the conspiracy that, after customers provided funds to AU to pay for stolen and fraudulently obtained electronic devices, defendants ADNAN VADRIA and UMAIR YASIN caused the disbursement of those funds to continue AU's operations, including purchasing additional stolen and

fraudulently obtained electronic devices from AU's sellers and paying AU's principals and employees.

7. It was further part of the conspiracy that defendants ADNAN VADRIA and UMAIR YASIN, and others known and unknown to the Grand Jury, concealed and hid, and caused to be concealed and hidden, the purposes and the acts done in furtherance of the conspiracy.

In violation of Title 18, United States Code, Section 1956(h).

**FORFEITURE ALLEGATION**

The SPECIAL JANUARY 2015 GRAND JURY alleges:

1. Upon conviction of an offense in violation of Title 18, United States Code, Sections 371 and 2314, as set forth in this indictment, defendants shall forfeit to the United States of America any property which constitutes and is derived from proceeds obtained directly or indirectly traceable as a result of such violation, as provided in Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

2. Upon conviction of an offense in violation of Title 18, United States Code, Section 1956(h), as set forth in this indictment, defendants shall forfeit to the United States of America, any property involved in such offense, and any property traceable to such property, as provided in Title 18, United States, Code Section 982(a)(1).

3. The property to be forfeited includes, but is not limited to:

a. a personal money judgment in an amount equal to the proceeds derived from the offenses in violation of Title 18, United States Code, Sections 371 and 2314, estimated to be approximately \$600,000;

b. a personal money judgment in an amount equal to the funds involved in the offenses in violation of Title 18, United States Code, Section 1956(h), estimated to be approximately \$8,000,000; and

c. the following specific property:

- i. approximately \$246,197.44 seized by law enforcement on September 11, 2013, from JP Morgan Chase Bank Account XXXXX9895.

4. If any of the property described above, as a result of any act or omission by a defendant: cannot be located upon the exercise of due diligence; has been transferred or sold to, or deposited with, a third party; has been placed beyond the jurisdiction of the Court; has been substantially diminished in value; or has been commingled with other property which cannot be divided without difficulty, the United States of America shall be entitled to forfeiture of substitute property, as provided in Title 21, United States Code, Section 853(p).

A TRUE BILL:

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FOREPERSON

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UNITED STATES ATTORNEY