

JMH:SP/VC
F. #2023R00389

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
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FILED
IN CLERK'S OFFICE
US DISTRICT COURT E.D.N.Y.
* JANUARY 9, 2024 *
BROOKLYN OFFICE

UNITED STATES OF AMERICA

- against -

ABU CHOWDHURY,
SYED RUBEL AHMED,
SHAHED ALOM,
[REDACTED],
ANZU KHAN,
IFFAT LUBNA and
SULTANA RAZIA,

Defendants.

----- X

SUPERSEDING
INDICTMENT

Cr. No. 23-278 (S-1) (NRM)
(T. 18, U.S.C., §§ 981(a)(1)(C),
1201(a)(1), 1201(c), 2 and 3551 et seq.;
T. 21, U.S.C., § 853(p); T. 28, U.S.C.,
§ 2461(c))

THE GRAND JURY CHARGES:

COUNT ONE
(Kidnapping Conspiracy)

1. In or about March 2023, within the Eastern District of New York and elsewhere, the defendants ABU CHOWDHURY, SYED RUBEL AHMED, SHAHED ALOM, [REDACTED], ANZU KHAN and SULTANA RAZIA, together with others, did knowingly and intentionally conspire to seize, confine, inveigle, kidnap, abduct and carry away and hold, for ransom and reward and otherwise, a person, to wit: John Doe-1, an individual whose identity is known to the Grand Jury, and use one or more means, facilities, and instrumentalities of interstate and foreign commerce, to wit: cellular telephones and the internet, in committing and in furtherance of the commission of the offense.

2. In furtherance of the conspiracy and to effect its objects, within the Eastern District of New York and elsewhere, the defendants ABU CHOWDHURY, SYED RUBEL AHMED, SHAHED ALOM, [REDACTED], ANZU KHAN and SULTANA RAZIA, together with others, did commit and cause the commission of, among others, the following:

OVERT ACTS

(a) On or about March 27, 2023, the defendants ABU CHOWDHURY, SYED RUBEL AHMED, SHAHED ALOM, [REDACTED], ANZU KHAN and SULTANA RAZIA, together with others, communicated with one another using cellular telephones regarding the kidnapping and assault of John Doe-1.

(b) On or about March 27, 2023, the defendant ABU CHOWDHURY, together with others, drove to the vicinity of 181st Street and Hillside Avenue in Queens, New York.

(c) On or about March 27, 2023, the defendants ABU CHOWDHURY and [REDACTED], together with others, abducted John Doe-1 in the vicinity of 181st Street and Hillside Avenue in Queens, New York by forcing John Doe-1 into a [REDACTED] [REDACTED] and driving John Doe-1 around Queens, New York.

(d) On or about March 27, 2023, the defendants ABU CHOWDHURY, SYED RUBEL AHMED and SULTANA RAZIA, together with others, assaulted John Doe-1 in Queens, New York.

(e) On or about March 27, 2023, the defendants SHAHED ALOM and ANZU KHAN, together with others, threatened to harm John Doe-1 while John Doe-1 was inside the [REDACTED].

(Title 18, United States Code, Sections 1201(c) and 3551 et seq.)

COUNT TWO
(Kidnapping)

3. On or about March 27, 2023, within the Eastern District of New York and elsewhere, the defendants ABU CHOWDHURY, SYED RUBEL AHMED, SHAHED ALOM, [REDACTED], ANZU KHAN and SULTANA RAZIA, together with others, did knowingly and intentionally seize, confine, inveigle, kidnap, abduct and carry away and hold, for ransom and reward and otherwise, a person, to wit: John Doe-1, and use one or more means, facilities, and instrumentalities of interstate and foreign commerce, to wit: cellular telephones and the internet, in committing and in furtherance of the commission of the offense.

(Title 18, United States Code, Sections 1201(a)(1), 2 and 3551 et seq.)

COUNT THREE
(Kidnapping Conspiracy)

4. In or about May 2023, within the Eastern District of New York and elsewhere, the defendants ABU CHOWDHURY, [REDACTED] and IFFAT LUBNA, together with others, did knowingly and intentionally conspire to seize, confine, inveigle, kidnap, abduct and carry away and hold, for ransom and reward and otherwise, a person, to wit: John Doe-2, an individual whose identity is known to the Grand Jury, and use one or more means, facilities, and instrumentalities of interstate and foreign commerce, to wit: cellular telephones and the internet, in committing and in furtherance of the commission of the offense.

5. In furtherance of the conspiracy and to effect its objects, within the Eastern District of New York and elsewhere, the defendants ABU CHOWDHURY, [REDACTED] and IFFAT LUBNA, together with others, did commit and cause the commission of, among others, the following:

OVERT ACTS

(a) On or about May 11, 2023, the defendants ABU CHOWDHURY, [REDACTED] and IFFAT LUBNA, together with others, communicated with one another using cellular telephones regarding the kidnapping and assault of John Doe-2.

(b) On or about May 11, 2023, the defendant IFFAT LUBNA, together with others, sent a text message via cellular telephone to the defendant ABU CHOWDHURY that contained a photograph of John Doe-2.

(c) On or about May 11, 2023, the defendants ABU CHOWDHURY and [REDACTED], together with others, drove to the vicinity of 72nd Street and Broadway in Queens, New York, forced John Doe-2 into a [REDACTED], and drove John Doe-2 around Queens, New York in the Honda Odyssey.

(d) On or about May 11, 2023, the defendant ABU CHOWDHURY and IFFAT LUBNA, together with others, assaulted John Doe-2 in Queens, New York.

(e) On or about May 11, 2023, the defendant ABU CHOWDHURY communicated with John Doe-2's father, an individual whose identity is known to the Grand Jury, via a cellular telephone and demanded a \$20,000 ransom for John Doe-2.

(Title 18, United States Code, Sections 1201(c) and 3551 et seq.)

COUNT FOUR
(Kidnapping)

6. On or about May 11, 2023, within the Eastern District of New York and elsewhere, the defendants ABU CHOWDHURY, [REDACTED] and IFFAT LUBNA, together with others, did knowingly and intentionally seize, confine, inveigle, kidnap, abduct and carry away and hold, for ransom and reward and otherwise, a person, to wit: John Doe-2, and use one or more means, facilities, and instrumentalities of interstate and foreign commerce, to wit: cellular telephones and the internet, in committing and in furtherance of the commission of the offense.

(Title 18, United States Code, Sections 1201(a)(1), 2 and 3551 et seq.)

CRIMINAL FORFEITURE ALLEGATION

7. The United States hereby gives notice to the defendants that, upon their conviction of any of the offenses charged herein, the government will seek forfeiture in accordance with Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), which require any person convicted of such offense to forfeit any property, real or personal, constituting or derived from proceeds obtained directly or indirectly as a result of such offense.

8. If any of the above-described forfeitable property, as a result of any act or omission of the defendants:

- (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), to seek forfeiture of any other property of the defendants up to the value of the forfeitable property described in this forfeiture allegation.

(Title 18, United States Code, Section 981(a)(1)(C); Title 21, United States Code, Section 853(p); Title 28, United States Code, Section 2461(c))

A TRUE BILL


FOREPERSON

By Carolyn Pokorny, Assistant U.S. Attorney

BREON PEACE
UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK

F.#: 2023R00389
FORM DBD-34
JUN. 85

No. 23-278 (S-1) (NRM)

UNITED STATES DISTRICT COURT

EASTERN District of NEW YORK

CRIMINAL DIVISION

THE UNITED STATES OF AMERICA

vs.

ABU CHOWDHURY, SYED RUBEL AHMED, SHAHED ALOM, [REDACTED]
[REDACTED] ANZU KHAN, IFFAT LUBNA and SULTANA RAZIA,

Defendants.

SUPERSEDING INDICTMENT

(T. 18, U.S.C., §§ 981(a)(1)(C), 1201(a)(1), 1201(c), 2 and 3551 et seq.;
T. 21, U.S.C., § 853(p); T. 28, U.S.C., § 2461(c))

A true bill.
Mary Beth Gleichman Foreperson

Filed in open court this _____ day.

of _____ A.D. 20 _____

Bail, \$ _____ Clerk

Stephanie Pak & Vincent Chiappini, Assistant U.S. Attorneys
(718) 254-6064 / 6299