

IN THE DISTRICT COURT OF THE UNITED STATES  
FOR THE DISTRICT OF SOUTH CAROLINA  
FLORENCE DIVISION

UNITED STATES OF AMERICA

vs.

**RAJA IMRAN YOUNAS,  
JESSICA VOIGHT,  
GRANDEUR MANAGEMENT INC,  
CENET USA LLC,  
PREMIER LAUNDRY AND LINEN  
SUPPLY LLC,  
TIGRAN HOVHANNISYAN,  
HOSPITALITY SERVICE GROUP  
LLC,**

**SYED REHAN NAQVI,  
RIDA NAQVI LLC**

CR. NO. 4:21-207

) 18 U.S.C. § 1349

) 18 U.S.C. § 1343

) 18 U.S.C. § 1956(h)

) 18 U.S.C. § 1956(a)(1)(A)(i)

) 18 U.S.C. § 1956(a)(1)(B)(i)

) 18 U.S.C. § 1546(a)

) 18 U.S.C. § 2

) 18 U.S.C. § 981(a)(1)(C)

) 18 U.S.C. § 982(a)(1)

) 28 U.S.C. § 2461(c)

SEALED SUPERSEDING INDICTMENT

INTRODUCTION

At all times material to this indictment:

EMPLOYER SPONSORED H-2B SEASONAL WORKER VISA PROGRAM

1. An H-2B nonimmigrant visa is a temporary work visa for foreign non-agricultural, seasonal workers.

2. An “alien” is an individual who is not a United States citizen or United States national. Under United States laws and regulations, aliens are not permitted lawfully to work in the United States without permission by the United States government.

3. Aliens cannot apply for H-2B nonimmigrant visas without being sponsored by an employer. The application is filed by, or on behalf of, the employer, who is referred to as the “petitioner,” and the alien is referred to as the “beneficiary.”

4. The U.S. Department of Labor (“DOL”) is responsible for approving petitioners as sponsor organizations for H-2B visas.

5. To obtain appropriate sponsor status, a petitioner files an Application for Temporary Employment Certification with DOL setting forth, among other items, the name of the employer, location of job, number of workers needed, job title and duties, and the rate of pay at the prevailing wage for that specific job in a specific geographic area in the United States. The petitioner completes and signs the application certifying that the information contained within the form is true and accurate under penalty of perjury.

6. United States Citizenship and Immigration Services (“USCIS”), an agency of the U.S. Department of Homeland Security (“DHS”) is responsible for processing and reviewing employment-based visa petitions pursuant to the Immigration and Nationality Act.

7. Once DOL issues a Final Determination Letter, certifying the petitioner as an eligible sponsor employer, the petitioner then files a Petition for Nonimmigrant Worker with USCIS. In the Petition for Nonimmigrant Worker, the petitioner sets forth, among other items, employee job titles, descriptions of the work, location of the job, number of workers petitioner intends to bring into the United States that season, duration of work, and wages.

8. Once this application is approved, the prospective alien workers included in that application can then apply for an H-2B nonimmigrant visa at a United States Embassy or Consulate abroad by submitting a Nonimmigrant Visa Application to the U.S. Department of State (DOS).

9. A sponsoring employer may apply on behalf of alien workers for extensions of the H-2B nonimmigrant visas. An H-2B nonimmigrant visa extension is granted for no more than one year at a time. The maximum period of continuous stay in the United States under the H-2B status is three years.

#### INDIVIDUAL B-2 TOURIST VISAS

10. A B-2 nonimmigrant visa is a temporary visa for tourism, vacation, medical treatment, and enrollment in a short recreational course of study.

11. To obtain a B-2 nonimmigrant visa, aliens must submit a Nonimmigrant Visa Application directly to DOS.

12. Under United States laws and regulations, holders of a B-2 visa are not permitted lawfully to work in the United States.

#### EMPLOYER SPONSORED Q-1 CULTURAL EXCHANGE VISA PROGRAM

13. A Q-1 nonimmigrant visa is a temporary visa for practical training and employment and for sharing of the history, culture, and traditions of your home country through participation in an international cultural exchange program. The purpose of the Q-1 nonimmigrant visa classification is to facilitate the sharing of international cultures. Intercultural engagement and exposure must be an essential and integral part of the worker's duties.

14. To sponsor Q-1 visas, a qualified employer must submit to USCIS the same Petition for Nonimmigrant Worker as they would to become an H-2B sponsoring employer. Along with the

position description, the petitioning employer must submit evidence that it maintains an established international cultural exchange program. The employer may demonstrate this by submitting copies of brochures, curriculum, or other types of material that illustrate that the program's cultural component is designed, on the whole, to exhibit or explain the attitude, customs, history, heritage, philosophy, traditions, and/or other cultural attributes (arts, literature, language) of the participant's country of nationality. The employer must also submit evidence that the program activities take place in a school, museum, business or other establishment where the American public, or a segment of the public sharing a common cultural interest, is exposed to aspects of a foreign culture as part of a structured program. In addition, to become a Q-1 sponsor the employer must establish that it: (1) has designated a qualified employee to administer the program and serve as liaison with USCIS; (2) is actively doing business in the United States; (3) will offer the alien wages and working conditions comparable to those accorded local workers similarly employed; and (4) has the financial ability to compensate the participant(s), as shown by a copy of the employer's most recent annual report, business income tax return or other form of certified accountant's report.

#### J-1 EXCHANGE VISA

15. A J-1 exchange visa is a temporary visa for individuals approved for an exchange program in the United States. The J-1 classification (exchange visitors) is authorized for those who intend to participate in an approved program for the purpose of teaching, instructing or lecturing, studying, observing, conducting research, consulting, demonstrating special skills, receiving training, or to receive graduate medical education or training.

16. The Department of State designates public and private entities to act as exchange sponsors.



J-1 nonimmigrants are therefore sponsored by an exchange program that is designated as such by the U.S. Department of State. These programs are designed to promote the interchange of persons, knowledge, and skills, in the fields of education, arts, and science.

17. The U.S. Department of State plays the primary role in administering the J-1 exchange visitor program. The first step in obtaining a J-1 visa is to submit a Form DS-2019, Certificate of Eligibility for Exchange Visitor Status, (formerly known as an IAP-66).

18. After one has obtained the Form DS-2019, an individual may apply for a J-1 visa through the U.S. Department of States. Employment is authorized for J-1 nonimmigrants only under the terms of the exchange program.

#### RELEVANT CORPORATE STRUCTURES

19. On December 8, 2006, **GRANDEUR MANAGEMENT INC** was incorporated by **RAJA YOUNAS** and Chomphunut Jatviatayachan with its principal place of business as Myrtle Beach, SC.

20. **RAJA YOUNAS** is the registered agent, president, and chief executive of **GRANDEUR MANAGEMENT INC**, and **JESSICA VOIGHT** was an employee of Grandeur Management during the relevant period of time of this Indictment.

21. **GRANDEUR MANAGEMENT INC** serves as a “petitioner” for visa applications.

22. On September 28, 2011, **PREMIER LAUNDRY AND LINEN SUPPLY LLC** was incorporated by **RAJA YOUNAS** with its principal place of business as Myrtle Beach, SC.

23. **RAJA YOUNAS** is the registered agent and Chief Financial Officer of **PREMIER LAUNDRY AND LINEN SUPPLY LLC**.

24. **PREMIER LAUNDRY AND LINEN SUPPLY LLC** serves as a “petitioner” for visa

applications.

25. On April 20, 2015, **CENET USA LLC** was incorporated by **RAJA YOUNAS** with its principal place of business as Myrtle Beach, SC.

26. **RAJA YOUNAS** is the registered agent of **CENET USA LLC**.

27. **CENET USA LLC** serves as a “petitioner” for visa applications.

28. On October 31, 2014, **HOSPITALITY SERVICE GROUP LLC (“HSG”)** was formed by **TIGRAN HOVHANNISYAN** with its principal place of business as Myrtle Beach, SC.

29. On October 27, 2016, HSG filed a corporate resolution stating that **TIGRAN HOVHANNISYAN** and **RAJA YOUNAS** each held a 50% membership interest in **HSG**.

30. **TIGRAN HOVHANNISYAN** is the registered agent and president of **HSG** during the relevant period of time of this Indictment.

31. **HSG** serves as a “petitioner” for visa applications.

32. On January 1, 2009, **RIDA NAQVI LLC** was formed by **SYED REHAN NAQVI** with its principal place of business as Myrtle Beach, SC.

33. **SYED REHAN NAQVI** was the registered agent and organizer of **RIDA NAQVI LLC** during the relevant period of time of this Indictment.

34. **RIDA NAQVI LLC** served as petitioner during the relevant period of time of this Indictment.



COUNT ONE

THE GRAND JURY CHARGES:

37. Paragraphs 1 through 36 of the Superseding Indictment are re-alleged as if fully incorporated in this Count.

38. That beginning at a date unknown to the Grand Jury, but from at least 2014, up to and including the date of this Indictment, in the District of South Carolina and elsewhere, the Defendants, **RAJA IMRAN YOUNAS, JESSICA VOIGHT, GRANDEUR MANAGEMENT INC, CENET USA LLC, PREMIER LAUNDRY AND LINEN SUPPLY LLC, TIGRAN HOVHANNISYAN, HOSPITALITY SERVICE GROUP LLC, SYED REHAN NAQVI, RIDA NAQVI LLC,** [REDACTED]

[REDACTED] knowingly and willfully did combine, conspire, confederate, and agree together with each other and with others, both known and unknown to the Grand Jury, to devise a scheme and artifice to defraud by luring workers from outside the United States to work for the defendants using material misrepresentations and false promises to the workers resulting in the submission of fraudulent visa petitions, and for the purpose of executing such scheme and artifice, did use wire communications in and affecting interstate commerce; in violation of Title 18, United States Code Section 1343.

Manner and Means

39. It was part of the conspiracy that the conspirators unjustly enriched themselves by collecting unauthorized and improper fees from aliens seeking H-2B nonimmigrant visas in violation of federal law thereby causing the workers to wire funds both within the United States and outside of the United States to financial accounts associated with the conspirators.

40. It was part of the conspiracy that the conspirators submitted to USCIS false and fraudulent Petitions for Nonimmigrant Workers, misrepresenting the positions, duties, rates of pay, working conditions, and living conditions when recruiting the workers and failing to disclose that they were paid unauthorized and improper fees on behalf of aliens seeking H-2B nonimmigrant visas to enter and work in the United States.

41. It was part of the conspiracy that the conspirators unjustly enriched themselves by collecting unauthorized and improper fees from aliens seeking B-2 nonimmigrant visas in violation of federal law thereby causing the workers to wire funds both within the United States and outside of the United States to financial accounts associated with the conspirators.

42. It was further part of the conspiracy that the conspirators misrepresented that they maintain an established international cultural exchange program, designed, on the whole, to exhibit or explain the attitude, customs, history, heritage, philosophy, traditions, and/or other cultural attributes (arts, literature, language) of the participant's country of nationality in order to obtain authorization to sponsor Q-1 visas, when in fact, once they arrived in the United States they placed those nonimmigrant employees whom they sponsored for those visas into inward facing housekeeping jobs, with no real opportunities for cultural exchange.

43. It was further part of the conspiracy that the conspirators would and did use separate accounts in order to pay employees differently based on their current nonimmigration or alien status in the U.S.

44. It was further part of the conspiracy that the conspirators would and did coach the workers on how to complete visa petitions and provide false information, as well as how to conduct themselves during immigration related interviews.

45. It was further part of the conspiracy that the conspirators promised the workers full time work, but once the workers arrived in the United States, the conspirators provided them less than full time work and consistently paid the workers less than the amount stated in the workers contracts and in the applications the coconspirators submitted to DOL and USCIS.

Overt Acts

46. During the conspiracy, **RAJA IMRAN YOUNAS** signed petitions for alien workers that contained material misrepresentations.

47. During the conspiracy, **JESSICA VOIGHT** conducted interviews with the alien workers over the internet and instructed the alien workers on how to wire unlawful visa fees charged by the conspirators.

48. During the conspiracy, **GRANDEUR MANAGEMENT INC** to include its affiliated companies **CENET, USA LLC** and **PREMIER LAUNDRY AND LINEN SUPPLY LLC** did not provide the hours and wages they promised to the workers in their contracts or represented to DOL and USCIS in their applications.

49. During the conspiracy, **TIGRAN HOVHANNISYAN** signed petitions for alien workers that contained material misrepresentations.

50. During the conspiracy, **HSG** did not provide the hours and wages promised to the workers in their contracts or represented to DOL and USCIS in their applications and further petitioned for individuals who never worked for **HSG**.

51. During the conspiracy [REDACTED] conducted interviews with the alien workers over the internet and telephone and instructed the alien workers on how to wire unlawful visa fees charged by the conspirators and also collected such fees.



52. During the conspiracy, [REDACTED] collected unlawful visa fees charged by the conspirators.

53. During the conspiracy, **SYED REHAN NAQVI**, signed petitions for the alien workers containing material misrepresentations.

54. During the conspiracy, **RIDA NAQVI LLC**, did not provide the hours and wages promised to the workers in their contracts or represented to DOL and USCIS in their applications and further petitioned for individuals who never worked for **RIDA NAQVI LLC**.

All in violation of Title 18, United States Code, Section 1349.

COUNT TWO

THE GRAND JURY FURTHER CHARGES:

55. Paragraphs 1 through 36 of the Superseding Indictment are re-alleged as if fully incorporated in this

Count.

56. That beginning in or around 2014, and continuing up to the date of this Indictment, in the District of South Carolina and elsewhere, the Defendants, **RAJA IMRAN YOUNAS, JESSICA VOIGHT, GRANDEUR MANAGEMENT INC, CENET USA LLC, AND PREMIER LAUNDRY AND LINEN SUPPLY LLC, TIGRAN HOVHANNISYAN, HOSPITALITY SERVICE GROUP LLC, SYED REHAN NAQVI, RIDA NAQVI LLC,**

[REDACTED]  
[REDACTED] knowingly and willfully did combine, conspire, agree together and have tacit understanding with each other and others, both known and unknown to the Grand Jury,

- a. to conduct and attempt to conduct financial transactions affecting interstate and foreign commerce, which involved property represented to be the proceeds of specified unlawful activity, that is wire fraud in violation of Title 18, United States Code Section 1349, and further knowing that the transactions were designed, in whole and in part, to promote the carrying on of a specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(A)(i); and
- b. to conduct and attempt to conduct financial transactions affecting interstate and

foreign commerce, which in fact involved the proceeds of specified unlawful activity, that is wire fraud, in violation of Title 18, United States Code, Section 1349, knowing that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, and further knowing that the transactions were designed, in whole and in part, to conceal and disguise the nature, the location, the source, the ownership, and the control of the property, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

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

COUNT THREE

THE GRAND JURY FURTHER CHARGES:

57. Paragraphs 1 through 36 of the Superseding Indictment are re-alleged as if fully incorporated in this Count.

58. On or about February 5, 2019, in the District of South Carolina and elsewhere, the defendants, **SYED REHAN NAQVI and RIDA NAQVI LLC**, did knowingly make under oath a false statement with respect to a material fact in a document required by the immigration laws and regulations prescribed thereunder, to wit, the Form I-129, Petition, that is, individuals known to the Grand Jury would be “cultural performers” for **RIDA NAQVI LLC**, which statement defendants then and there knew was false, in that such individuals would not serve as cultural performers for **RIDA NAQVI LLC**, but instead worked as housekeepers and in other customer support positions for other businesses; and did aid and abet each other in doing so;

In violation of Title 18, United States Code, Section 1546(a) and 2.

COUNT FOUR

THE GRAND JURY FURTHER CHARGES:

59. Paragraphs 1 through 36 of the Superseding Indictment are re-alleged as if fully incorporated in this Count.

60. On or about April 17, 2018, in the District of South Carolina and elsewhere, the defendants, **RAJA YOUNAS and GRANDEUR MANAGEMENT INC.**, did knowingly make under oath a false statement with respect to a material fact in a document required by the immigration laws and regulations prescribed thereunder, to wit, the Form I-129, Petition, that is, individuals known to the Grand Jury would be “cultural performers” for **GRANDEUR MANAGEMENT INC.**, which statement defendants then and there knew was false, in that such individuals would not serve as cultural performers for **GRANDEUR MANAGEMENT INC.**, but instead worked as housekeepers and in other customer support positions; and did aid and abet each other in doing so;

In violation of Title 18, United States Code, Section 1546(a) and 2.



COUNT FIVE

THE GRAND JURY FURTHER CHARGES:

61. Paragraphs 1 through 36 of the Superseding Indictment are re-alleged as if fully incorporated in this Count.

62. On or about February 5, 2018, in the District of South Carolina and elsewhere, the defendants, **TIGRAN HOVHANNISYAN and HOSPITALITY SERVICE GROUP LLC**, did knowingly make under oath a false statement with respect to a material fact in a document required by the immigration laws and regulations prescribed thereunder, to wit, the Form I-129, Petition, that is, individuals known to the Grand Jury did not pay a job placement fee or other compensation as a condition of employment or agreement to pay such a service fee when, in fact, alien workers were forced to pay such job placement fees and compensation as a condition of employment; and did aid and abet each other in doing so;

In violation of Title 18, United States Code, Section 1546(a) and 2.

FORFEITURE

WIRE FRAUD CONSPIRACY:

Upon conviction to violate Title 18, United States Code, Section 1349 (conspiracy to violate 18 U.S.C. § 1343), as charged in this Superseding Indictment, the defendants, **RAJA IMRAN YOUNAS, JESSICA VOIGHT, GRANDEUR MANAGEMENT INC, CENET USA LLC, AND PREMIER LAUNDRY AND LINEN SUPPLY LLC, TIGRAN HOVHANNISYAN, HOSPITALITY SERVICE GROUP LLC, SYED REHAN NAQVI, RIDA NAQVI LLC,** [REDACTED]

[REDACTED] shall forfeit to the United States, any property, real and personal, which constitutes, is derived from or is traceable to proceeds the defendants obtained, directly or indirectly, as the result of such violations.

MONEY LAUNDERING:

Upon conviction to violate Title 18, United States Code, Section 1956, as charged in this Superseding Indictment, the defendants, **RAJA IMRAN YOUNAS, JESSICA VOIGHT, GRANDEUR MANAGEMENT INC, CENET USA LLC, AND PREMIER LAUNDRY AND LINEN SUPPLY LLC, TIGRAN HOVHANNISYAN, HOSPITALITY SERVICE GROUP LLC, SYED REHAN NAQVI, RIDA NAQVI LLC,** [REDACTED]

[REDACTED] shall forfeit to the United States any property, real or personal, involved in a transaction or attempted transaction in violation of 18 U.S.C. § 1956, or any property traceable to violations.

PROPERTY:

Pursuant to Title 18, United States Code, Sections 981(a)(1)(C) and 982(a)(1), and Title 28, United States Code, Section 2461(c), the property subject to forfeiture includes, but is not limited to, the following:

(1) Proceeds/Forfeiture Judgment:

A sum of money equal to all proceeds the Defendants obtained, directly or indirectly, from the offenses charged in this Indictment, and all interest and proceeds traceable thereto, and/or that such sum equals all property derived from or traceable to their violations of 18 U.S.C. §§ 1343 and 1349.

(2) Money Laundering Forfeiture Judgment:

A sum of money equal to all property involved in the money laundering offenses charged in the Indictment, and all interest and proceeds traceable thereto, for which the Defendants are liable as the result of their violations of 18 U.S.C. § 1956.

SUBSTITUTE ASSETS:

If any of the property described above as being subject to forfeiture, 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 person;
- 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 subdivided without difficulty;

it is the intention of the United States, pursuant to Title 18, United States Code, Section 982(b)(1), incorporating 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;

Pursuant to Title 18, United States Code, Sections 981(a)(1)(C) and 982(a)(1), and Title 28, United States Code, Section 2461(c).

A True Bill



FOREPERSON

M. Rhett Dehart  
M. RHETT DEHART (CFS/DD)  
ACTING UNITED STATES ATTORNEY