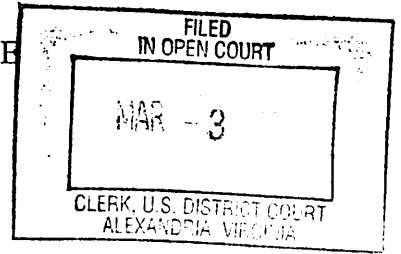


IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA
Alexandria Division



UNITED STATES OF AMERICA)
)
 v.)
)
 AZIZUR RAHMAN,)
 Defendant.)

No. 1:21-cr-00022

INDICTMENT

The Grand Jury charges that:

At all times relevant to this Indictment or as otherwise indicated herein:

1. **Azizur Rahman**, the defendant, resided in Herndon, Virginia, within the Eastern District of Virginia. **Azizur Rahman** became a naturalized United States citizen on September 28, 1982.

SUMMARY OF THE SCHEME

2. On or about March 20, 2015, **Azizur Rahman** disclosed to the Internal Revenue Service (“IRS”) that he had previously failed to properly report his financial interest in, or signature authority over, foreign bank accounts on his tax filings. **Azizur Rahman** claimed he was eligible for a reduced penalty for this past failure because he was unaware of his legal obligation to report his financial interest in, or signature authority over, his foreign bank accounts. In his disclosure, the defendant identified three bank accounts in Switzerland. He verified that the 2015 disclosure was a complete statement of all the foreign assets that he had failed to report in the six prior years.

3. The defendant’s 2015 disclosure to the IRS was false. **Azizur Rahman’s** disclosure did not report all the foreign bank accounts that he controlled in the six prior years. **Azizur Rahman** had a financial interest in, or signature authority over more than twenty

additional foreign bank accounts in at least three other foreign countries, all of which he had previously failed to report to the IRS, and which he continued to conceal on his 2015 disclosure.

INTRODUCTION

Disclosure Obligations

4. The IRS was an agency of the United States Department of the Treasury responsible for administering the tax laws of the United States and collecting taxes owed to the United States.

5. Each year, United States citizens who had an interest in, or signature authority over, one or more financial accounts in a foreign country with an aggregate value of more than \$10,000 at any time during the prior year were required to file with the Commissioner of Internal Revenue a Report of Foreign Bank and Financial Accounts (“FBAR”), using Form TD F 90-22.1 prior to January 1, 2013, or, after January 1, 2013, using FinCEN Form 114. An FBAR identified, among other things, the name of the financial institution at which the account was held, the account number, and the maximum value of the account during the calendar year. For calendar years 2010 through 2015, the FBAR for the applicable year was due by June 30 of the following year. For calendar year 2016, the FBAR was due by October 18, 2017.

6. On the Schedule B of the U.S. Individual Income Tax Return (“IRS Form 1040”) taxpayers report their interest in, or signature authority over, any financial account in a foreign country for that year, and (i) whether the taxpayer was required to file a FBAR for that calendar year, and (ii) in what foreign country the account was maintained.

7. The IRS Streamlined Domestic Offshore Procedures (the “Streamlined procedures”) allowed eligible taxpayers residing within the United States who: (i) failed to report gross income from foreign financial accounts on prior tax returns, (ii) failed to pay taxes on that

gross income, or (iii) failed to submit an FBAR disclosing foreign financial accounts, to voluntarily disclose their conduct to the IRS. Taxpayers who were eligible under the Streamlined procedures benefitted from substantially lower penalties than those provided by other IRS voluntary disclosure programs.

8. In order to be eligible under the Streamlined procedures, taxpayers were required to file amended tax returns for the most recent three years for which the U.S. tax return due date had passed and certify under the penalties of perjury that their failure to report all income, pay all tax, or submit all required returns was due to non-willful conduct. Under the terms of the Streamlined procedures, the IRS defined non-willful conduct as conduct that was due to negligence, inadvertence, or mistake, or conduct that was the result of a good-faith misunderstanding of the law.

Foreign Entities and Accounts

9. Hotel Purbani International Ltd. was a company located in Dhaka, Bangladesh, that owned and operated the Hotel Purbani in Dhaka. **Azizur Rahman** held an ownership interest in Hotel Purbani International Ltd.

10. Bangladesh Hotels Ltd. was a company located in Dhaka, Bangladesh, that owned a majority interest in Hotel Purbani International Ltd. **Azizur Rahman** served as Director of Bangladesh Hotels Ltd.

11. Pharmadesh Laboratories Ltd. was a company located in Dhaka, Bangladesh. **Azizur Rahman** held an ownership interest in Pharmadesh Laboratories Ltd.

12. MAAS Travel and Tours Ltd. was a company located in Dhaka, Bangladesh. **Azizur Rahman** held an ownership interest in MAAS Travel and Tours Ltd.

13. Credit Agricole Indosuez (Suisse) SA (“Credit Agricole”) was a bank organized under the laws of, and domiciled in, Switzerland. From at least October 2004 through at least May 2015, **Azizur Rahman** held a financial interest in, and signatory authority over, one or more accounts at Credit Agricole held in his own name, including an account ending in 4440. In opening the account, **Azizur Rahman** falsely reported to Credit Agricole that his tax residence was “Bangladesh.”

14. Lloyds TSB Bank Plc (“Lloyds Private Bank”) was the private banking arm of Lloyds Banking Group Plc. Lloyds Private Bank was a bank organized under the laws of, and domiciled in, Switzerland. From at least June 2012 through at least October 2013, **Azizur Rahman** held a financial interest in, and signatory authority over, one or more accounts at Lloyds Private Bank held in his own name, including an account ending in 9295. In the paperwork to open the account, **Azizur Rahman** falsely reported he was a “Non-US Person.”

15. In May 2013, Union Bancaire Privée (“UBP”), a bank organized under the laws of, and domiciled in, Switzerland, purchased Lloyds Private Bank from Lloyds Banking Group Plc. **Azizur Rahman’s** account with Lloyds Private Bank was transferred to UBP in the second half of 2013. From at least October 2013 through at least July 2015, **Azizur Rahman** held a financial interest in, and signatory authority over, one or more accounts at UBP held in his own name, including an account ending in 5349.

16. EFG Private Bank (“EFG UK”) was a bank organized under the laws of, and domiciled in, the United Kingdom. From at least April 2006 through at least August 2013, **Azizur Rahman** held a financial interest in, and signatory authority over, one or more accounts at EFG UK held in his own name, including an account ending in 8740.

17. EFG Bank AG was a bank organized under the laws of, and domiciled in, Switzerland. From at least August 2009 through at least August 2013, **Azizur Rahman** held a financial interest in, and signatory authority over, one or more accounts at the Singaporean Branch of EFG Bank AG (“EFG Singapore”) held in his own name, including an account ending in 5117.

18. Bank Asia Limited (“Bank Asia”) was a bank organized under the laws of, and domiciled in, Bangladesh. From at least December 2012 through at least August 2016, **Azizur Rahman** held a financial interest in, and signatory authority over, one or more accounts at Bank Asia held in the name of Hotel Purbani International, including an account ending in 4668.

19. BRAC Bank Limited (“BRAC Bank”) was a bank organized under the laws of, and domiciled in, the People’s Republic of Bangladesh. From at least June 2011 through at least June 2016, **Azizur Rahman** held a financial interest in, and signatory authority over, one or more accounts at BRAC Bank held in the name of MAAS Travel and Tours Ltd., including accounts ending in 9001 and 3001.

20. Dutch-Bangla Bank Ltd. (“Dutch-Bangla Bank”) was a bank organized under the laws of, and domiciled in, the People’s Republic of Bangladesh. From at least April 2010 through at least July 2016, **Azizur Rahman** held a financial interest in, and signatory authority over, one or more accounts at Dutch-Bangla Bank held in the name of Hotel Purbani International, including accounts ending in 1130 and 2804.

21. The Hongkong and Shanghai Banking Corporation Limited, Bangladesh (“HSBC Bangladesh”) was a bank organized under the laws of, and domiciled in, the People’s Republic of Bangladesh. From at least September 2010 through at least March 2016, **Azizur Rahman** held a financial interest in, and signatory authority over, one or more accounts at HSBC

Bangladesh held in the name of MAAS Travel and Tours Ltd., including accounts ending in 6011, 6012, 6013, 6067, 6068, and 6069.

22. Mutual Trust Bank Limited (“MTB”) was a bank organized under the laws of, and domiciled in, the People’s Republic of Bangladesh. From at least February 2010 through at least December 2016, **Azizur Rahman** held a financial interest in, and signatory authority over, one or more accounts at MTB held in the names of Hotel Purbani International, Pharmadesh Laboratories Ltd, and MAAS Travel and Tours Ltd., including accounts ending in 0189, 0359, 4445, and 4694.

23. One Bank Ltd. (“One Bank”) was a bank organized under the laws of, and domiciled in, the People’s Republic of Bangladesh. From at least May 2010 through at least February 2016, **Azizur Rahman** held a financial interest in, and signatory authority over, one or more accounts at One Bank held in his own name and in the name of MAAS Travel and Tours Ltd., including accounts ending in 1008, 1018, 1026, and 9002.

24. Prime Bank Limited (“Prime Bank”) was a bank organized under the laws of, and domiciled in, the People’s Republic of Bangladesh. From at least June 2011 through at least June 2013, **Azizur Rahman** held a financial interest in, and signatory authority over, one or more accounts at Prime Bank held in the name of MAAS Travel and Tours Ltd., including an account ending in 0304.

25. Pubali Bank Limited (“Pubali Bank”) was a bank organized under the laws of, and domiciled in, the People’s Republic of Bangladesh. From at least September 2015 through at least December 2016, **Azizur Rahman** held a financial interest in, and signatory authority over, one or more accounts at Pubali Bank held in the name of Hotel Purbani International, including accounts ending in 7201 and 7214.

26. Southeast Bank Limited (“Southeast Bank”) was a bank organized under the laws of, and domiciled in, the People’s Republic of Bangladesh. From at least December 2010 through at least July 2016, **Azizur Rahman** held a financial interest in, and signatory authority over, one or more accounts at Southeast Bank held in the name of Hotel Purbani International, including an account ending in 6605.

27. United Commercial Bank Ltd. (“UCB”) was a bank organized under the laws of, and domiciled in, the People’s Republic of Bangladesh. From at least June 2011 through at least August 2016, **Azizur Rahman** held a financial interest in, and signatory authority over, one or more accounts at UCB held in his own name and in the names of Hotel Purbani International and MAAS Travel and Tours Ltd., including accounts ending in 0015, 0032, 2367, 0067 (later renumbered to end in 0110), and 6230 (later renumbered to end in 0371).

FBAR and Tax Filing History

28. On or about the dates listed in the chart below, Azizur Rahman made and subscribed IRS Forms 1040 for the tax years listed below, which were filed with the IRS. On each of the Schedules B of these tax returns, Azizur Rahman claimed, in effect, that he did not have an interest in, or signature authority over, one or more financial accounts in a foreign country with an aggregate value of more than \$10,000 at any time during those years, with his specific answers on each return set forth below:

Approximate Filing Date	Tax Year	Did you have an interest in or signature authority over a financial account in a foreign country?	If yes, are you required to file an FBAR reporting that financial interest or signature authority?
March 14, 2011	2010	No	(Blank)
March 8, 2012	2011	Yes	No
March 8, 2013	2012	Yes	No
April 15, 2014	2013	No	(Blank)

29. During tax years 2010 through 2013, **Azizur Rahman** did, in fact, have a financial interest or signature authority over foreign financial accounts, including accounts at Credit Agricole, Lloyds, UBP, EFG UK, EFG Singapore, Bank Asia, BRAC Bank, Dutch-Bangla Bank, HSBC Bangladesh, MTB, One Bank, Prime Bank, Southeast Bank, and UCB. The defendant's accounts at each of these banks had an aggregate value of more than \$10,000 during those tax years.

30. **Azizur Rahman** also failed to file timely FBARs for calendar years 2010 through 2012 with the Commissioner of Internal Revenue.

31. On or about June 30, 2014, **Azizur Rahman** filed with the Commissioner of Internal Revenue an FBAR for calendar year 2013, which disclosed his interest in, or signatory authority over, three bank accounts, all located in Switzerland: (i) Lloyds Private Bank account ending in 9295; (ii) UBP account ending in 5349; and, (iii) Credit Agricole account ending in 4440.

32. On or about February 24, 2015, **Azizur Rahman** filed with the Commissioner of Internal Revenue delinquent FBARs for calendar years 2008 through 2012 and an amended FBAR for calendar year 2013. Those FBARs disclosed the defendant's interest in, or signatory authority over the accounts listed below, all located in Switzerland, and concealed the defendant's interest in, or signatory authority over, other foreign accounts including the accounts set forth below, among others:

Calendar Year	Foreign Accounts Disclosed	Foreign Accounts Concealed
2008	1. Credit Agricole account ending in 4440	1. EFG UK account ending in 8740
2009	1. Credit Agricole account ending in 4440	1. EFG UK account ending in 8740 2. EFG Singapore account ending in 5117

Calendar Year	Foreign Accounts Disclosed	Foreign Accounts Concealed
2010	1. Credit Agricole account ending in 4440	1. EFG UK account ending in 8740 2. EFG Singapore account ending in 5117 3. Dutch-Bangla Bank account ending in 1130 4. HSBC Bangladesh accounts ending in 6011, 6012, 6013, 6067, 6068, and 6069 5. One Bank account ending in 9002 6. Southeast Bank account ending in 6605
2011	1. Credit Agricole account ending in 4440	1. EFG UK account ending in 8740 2. EFG Singapore account ending in 5117 3. BRAC Bank account ending in 9001 4. Dutch-Bangla Bank account ending in 1130 5. HSBC Bangladesh accounts ending in 6011, 6012, 6013, 6067, 6068, and 6069 6. MTB accounts ending in 0359 and 4445 7. One Bank accounts ending in 1018, 1026, and 9002 8. Prime Bank account ending in 0304 9. Southeast Bank account ending in 6605 10. UCB accounts ending in 0015 and 0032
2012	1. Credit Agricole account ending in 4440 2. Lloyds Private Bank account ending in 9295	1. EFG UK account ending in 8740 2. EFG Singapore account ending in 5117 3. Bank Asia account ending in 4668 4. BRAC Bank account ending in 9001 5. Dutch-Bangla Bank account ending in 1130 6. HSBC Bangladesh accounts ending in 6011, 6012, 6013, 6067, 6068, and 6069 7. MTB accounts ending in 0359 and 4445 8. One Bank account ending in 1018 and 1026 9. Prime Bank account ending in 0304 10. Southeast Bank account ending in 6605 11. UCB accounts ending in 0015, 0032, 2367, and 6230/0371
2013 (Amended)	1. Credit Agricole account ending in 4440 2. Lloyds Private Bank account ending in 9295 3. UBP account ending in 5349	1. EFG UK account ending in 8740 2. EFG Singapore account ending in 5117 3. Bank Asia account ending in 4668 4. BRAC Bank accounts ending in 9001 and 3001 5. Dutch-Bangla Bank account ending in 1130 6. HSBC Bangladesh accounts ending in 6011, 6012, 6013, 6067, 6068, and 6069 7. MTB account ending in 0359 8. One Bank account ending in 1018 and 1026 9. Prime Bank account ending in 0304 10. Southeast Bank account ending in 6605 11. UCB accounts ending in 0015, 2367, and 6230/0371

33. On or about March 20, 2015, **Azizur Rahman** submitted to the IRS a Certification by U.S. Person Residing in the United States for Streamlined Domestic Offshore Procedures (IRS Form 14654, "Streamlined submission"). In his Streamlined submission, the defendant disclosed his interest in three foreign bank accounts for the tax years 2008 through 2013 as set forth below and concealed other foreign bank accounts, including accounts set forth below, among others:

Tax Year	Foreign Accounts Reported	Foreign Accounts Concealed
2008	1. Credit Agricole account ending in 4440	1. EFG UK account ending in 8740
2009	1. Credit Agricole account ending in 4440	1. EFG UK account ending in 8740 2. EFG Singapore account ending in 5117
2010	1. Credit Agricole account ending in 4440	1. EFG UK account ending in 8740 2. EFG Singapore account ending in 5117 3. Dutch-Bangla Bank account ending in 1130 4. HSBC Bangladesh accounts ending in 6011, 6012, 6013, 6067, 6068, and 6069 5. One Bank account ending in 9002 6. Southeast Bank account ending in 6605
2011	1. Credit Agricole account ending in 4440	1. EFG UK account ending in 8740 2. EFG Singapore account ending in 5117 3. BRAC Bank account ending in 9001 4. Dutch-Bangla Bank account ending in 1130 5. HSBC Bangladesh accounts ending in 6011, 6012, 6013, 6067, 6068, and 6069 6. MTB accounts ending in 0359 and 4445 7. One Bank accounts ending in 1018, 1026, and 9002 8. Prime Bank account ending in 0304 9. Southeast Bank account ending in 6605 10. UCB accounts ending in 0015 and 0032

Tax Year	Foreign Accounts Reported	Foreign Accounts Concealed
2012	<ol style="list-style-type: none"> 1. Credit Agricole account ending in 4440 2. Lloyds Private Bank account ending in 5349 	<ol style="list-style-type: none"> 1. EFG UK account ending in 8740 2. EFG Singapore account ending in 5117 3. Bank Asia account ending in 4668 4. BRAC Bank account ending in 9001 5. Dutch-Bangla Bank account ending in 1130 6. HSBC Bangladesh accounts ending in 6011, 6012, 6013, 6067, 6068, and 6069 7. MTB accounts ending in 0359 and 4445 8. One Bank account ending in 1018 and 1026 9. Prime Bank account ending in 0304 10. Southeast Bank account ending in 6605 11. UCB accounts ending in 0015, 0032, 2367, and 6230
2013	<ol style="list-style-type: none"> 1. Credit Agricole account ending in 4440 2. UBP account ending in 5349 	<ol style="list-style-type: none"> 1. EFG UK account ending in 8740 2. EFG Singapore account ending in 5117 3. Bank Asia account ending in 4668 4. BRAC Bank accounts ending in 9001 and 3001 5. Dutch-Bangla Bank account ending in 1130 6. HSBC Bangladesh accounts ending in 6011, 6012, 6013, 6067, 6068, and 6069 7. MTB account ending in 0359 8. One Bank account ending in 1018 and 1026 9. Prime Bank account ending in 0304 10. Southeast Bank account ending in 6605 11. UCB accounts ending in 0015, 2367, and 6230

34. In his Streamlined submission, **Azizur Rahman** also falsely certified under the penalties of perjury that he was eligible for treatment under the Streamlined procedures and that his failure to report all income, pay all tax, and submit all required information returns, including FBARs, was due to non-willful conduct.

35. On or about March 20, 2015, in conjunction with his Streamlined submission, **Azizur Rahman** filed with the IRS Amended U.S. Individual Income Tax Returns (“IRS Form 1040X”) for the tax years 2010 through 2013.

36. On each of the Schedules B attached to the IRS Forms 1040X for each tax year, **Azizur Rahman** reported that he had an interest in, or signature authority over, a financial account in Switzerland. **Azizur Rahman** did not report that he had an interest in, or signatory

authority over, any foreign financial accounts located in any other foreign countries, despite having an interest in foreign financial accounts in the United Kingdom, the Republic of Singapore, and the People’s Republic of Bangladesh during those years.

37. On or about the dates listed in the chart below, **Azizur Rahman** made and subscribed IRS Forms 1040 for the tax years listed below, which were filed with the IRS. On each of the Schedules B of these tax returns, **Azizur Rahman** effectively reported that he did not have an interest in, or signature authority over, one or more financial accounts in a foreign country with an aggregate value of more than \$10,000 at any time during these years, with his specific answers on each return below:

Approximate Filing Date	Tax Year	Did you have an interest in or signature authority over a financial account in a foreign country?	If yes, are you required to file an FBAR reporting that financial interest or signature authority?
April 6, 2015	2014	Yes	No
April 6, 2016	2015	No	(Blank)
April 2, 2017	2016	No	(Blank)

38. For tax years 2014 through 2016, **Azizur Rahman** did, in fact, have a financial interest or signature authority over foreign financial accounts, including accounts at (i) Credit Agricole, (ii) UBP, (iii) Bank Asia, (iv) BRAC Bank, (v) Dutch-Bangla Bank, (vi) HSBC Bangladesh, (vii) MTB, (viii) One Bank, (ix) Pubali Bank, (x) Southeast Bank, and (xi) UCB. The defendant’s accounts at each of these banks had an aggregate value of more than \$10,000 during those tax years, and, thus, **Azizur Rahman** was required to file an FBAR reporting those accounts.

39. **Azizur Rahman** failed to file timely FBARs for calendar years 2014 through 2016 with the Commissioner of Internal Revenue.

Leaving the United States

40. On or about December 17, 2019, after receiving information about the criminal investigation against him, **Azizur Rahman** relocated from the United States to a country that has no extradition treaty with the United States. He has remained outside the United States through the date of this Indictment.

COUNT ONE
(False Documents Submitted to the IRS)

41. The factual allegations contained in Paragraphs 1 through 40 of the Introduction to this Indictment are re-alleged and incorporated herein.

42. On or about March 20, 2015, in the Eastern District of Virginia and elsewhere, the defendant, **Azizur Rahman**, a resident of Herndon, Virginia, did willfully make and subscribe an IRS Form 14654, Streamlined submission, which was verified by a written declaration that it was made under the penalties of perjury and which **Azizur Rahman** did not believe to be true and correct as to every material matter. That Streamlined submission stated the following false material items, among others: (i) **Azizur Rahman** met all the eligibility requirements for treatment under the Streamlined procedures; (ii) **Azizur Rahman's** failure to report all income, pay all tax, and submit all required information returns, including FBARs, was due to non-willful conduct; (iii) **Azizur Rahman's** foreign financial assets subject to the 5% miscellaneous offshore penalty were the Credit Agricole account ending in 4440, the Lloyds Private Bank account ending in 9295, and the UBP account ending in 5349; and (iv) **Azizur Rahman's** statements were true, correct, and complete.

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

COUNTS TWO THROUGH NINE
(False Tax Returns Submitted to the IRS)

43. The factual allegations contained in Paragraphs 1 through 40 of the Introduction to this Indictment are re-alleged and incorporated herein.

44. On or about the dates listed below, in the Eastern District of Virginia and elsewhere, the defendant, **Azizur Rahman**, a resident of Herndon, Virginia, did willfully make and subscribe the following U.S. Individual Income Tax Returns, IRS Forms 1040 and Amended U.S. Individual Income Tax Returns, IRS Forms 1040X, for the tax years listed, each of which was filed with the IRS and verified by a written declaration that it was made under the penalties of perjury, and which **Azizur Rahman** did not believe to be true and correct as to every material matter, which contained the following false material items, among others, as set forth below:

Count	Tax Year	IRS Form	Approximate Date Filed	False Item(s)
2	2013	1040	4/15/2014	Line 7 (Wages, Salaries, Tips): \$0 Line 22 (Total Income): \$46,325 Schedule B, Line 7A (Foreign Accounts): No Schedule C, Line 1 (Gross Receipts): \$57,500 Schedule C, Line 31 (Net Profit/Loss): \$43,450
3	2010	1040X	3/20/2015	Line 5C (Correct Taxable Income): -\$17,347 Line 7 (Wages, Salaries, Tips): \$0 Line 22 (Total Income): \$30,528 Schedule B, Line 7B (Foreign Country): Switzerland
4	2011	1040X	3/20/2015	Line 5C (Correct Taxable Income): -\$1,732 Line 7 (Wages, Salaries, Tips): \$0 Line 22 (Total Income): \$40,006 Schedule B, Line 7B (Foreign Country): Switzerland
5	2012	1040X	3/20/2015	Line 5C (Correct Taxable Income): \$774,459 Line 7 (Wages, Salaries, Tips): \$0 Line 22 (Total Income): \$815,500 Schedule B, Line 7B (Foreign Country): Switzerland
6	2013	1040X	3/20/2015	Line 5C (Correct Taxable Income): \$86,699 Line 7 (Wages, Salaries, Tips): \$0 Line 22 (Total Income): \$134,239 Schedule B, Line 7B (Foreign Country): Switzerland Form 8938, Line 1 (Number of Accounts): 3

Count	Tax Year	IRS Form	Approximate Date Filed	False Items(s)
7	2014	1040	4/6/2015	Line 7 (Wages, Salaries, Tips): \$0 Line 22 (Total Income): \$593,858 Schedule B, Line 7A (FBAR Required): No Schedule C, Line 1 (Gross Receipts): \$0 Schedule C, Line 31 (Net Profit/Loss): -\$950
8	2015	1040	4/6/2016	Line 7 (Wages, Salaries, Tips): \$0 Line 22 (Total Income): \$18,811 Schedule B, Line 7A (Foreign Accounts): No
9	2016	1040	4/2/2017	Line 7 (Wages, Salaries, Tips): \$0 Line 22 (Total Income): \$46,190 Schedule B, Line 7A (Foreign Accounts): No

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

COUNTS TEN THROUGH FOURTEEN
(False Statements in a Document)

45. The factual allegations contained in Paragraphs 1 through 40 of the Introduction to this Indictment are re-alleged and incorporated herein.

46. On or about the following dates, in the Eastern District of Virginia and elsewhere, in a matter within the jurisdiction of the Commissioner of Internal Revenue, an agency of the executive branch of the United States government, the defendant, **Azizur Rahman**, a resident of Herndon, Virginia, did knowingly and willfully make and submit to the Commissioner of Internal Revenue a false writing and document knowing the same to contain a materially false, fictitious, and fraudulent statement and entry on the documents listed below, which materially misrepresented the facts listed below:

Count	Date Submitted	Document	Material Misstatement
10	6/30/2014	FBAR (2013)	Reported only three foreign financial accounts.
11	2/24/2015	FBAR (2010)	Reported only one foreign financial account.
12	2/24/2015	FBAR (2011)	Reported only one foreign financial account.
13	2/24/2015	FBAR (2012)	Reported only two foreign financial accounts.
14	2/24/2015	Amended FBAR (2013)	Reported only three foreign financial accounts.

All in violation of Title 18, United States Code, Section 1001(a)(3).

COUNTS FIFTEEN THROUGH SEVENTEEN
(Failing to File Reports of Foreign Bank and Financial Accounts)

47. The factual allegations contained in Paragraphs 1 through 40 of the Introduction to this Indictment are re-alleged and incorporated herein.

48. During calendar years 2014 through 2016, the approximate high balances of foreign financial accounts in which **Azizur Rahman** held a financial interest or signatory authority were as follows:

Calendar Year	Foreign Financial Account	High Balance
2014	Credit Agricole (x4440)	\$31,252,922.74 (U.S. Dollar)
2014	UBP (x9925)	\$14,363,400.00 (U.S. Dollar)
2014	BRAC Bank (x9001)	₳1,962,468.48 (Bangladeshi Taka)
2014	BRAC Bank (x3001)	₳201,678.72 (Bangladeshi Taka)
2014	Dutch-Bangla Bank (x1130)	₳1,180,015.95 (Bangladeshi Taka)
2014	HSBC Bangladesh (x6011)	₳1,003,898.60 (Bangladeshi Taka)
2014	HSBC Bangladesh (x6013)	₳8,358,177.92 (Bangladeshi Taka)
2014	HSBC Bangladesh (x6068)	₳1,972,356.53 (Bangladeshi Taka)
2014	HSBC Bangladesh (x6069)	₳119,226.07 (Bangladeshi Taka)
2014	One Bank (x1008)	₳21,428,764.61 (Bangladeshi Taka)
2014	One Bank (x1026)	₳32,141,700.55 (Bangladeshi Taka)
2014	UCB (x2367)	₳1,291,822.00 (Bangladeshi Taka)
2014	UCB (x6230/x0371)	₳249,461.00 (Bangladeshi Taka)
2015	Credit Agricole (x4440)	\$10,065,365.16 (U.S. Dollar)
2015	UBP (x9925)	\$3,533,519.74 (U.S. Dollar)
2015	BRAC Bank (x9001)	₳1,659,370.16 (Bangladeshi Taka)
2015	Dutch-Bangla Bank (x1130)	₳2,058,056.70 (Bangladeshi Taka)

Calendar Year	Foreign Financial Account	High Balance
2015	Dutch-Bangla Bank (x2804)	₳1,016,730.94 (Bangladeshi Taka)
2015	HSBC Bangladesh (x6013)	₳6,028,269.24 (Bangladeshi Taka)
2015	HSBC Bangladesh (x6069)	₳121,034.31 (Bangladeshi Taka)
2015	MTB (x4694)	₳1,002,545.00 (Bangladeshi Taka)
2015	One Bank (x1008)	₳3,413,159.61 (Bangladeshi Taka)
2015	One Bank (x1026)	₳42,122,316.73 (Bangladeshi Taka)
2015	Pubali Bank (x7201)	₳1,106,475.06 (Bangladeshi Taka)
2015	Pubali Bank (x7214)	₳671,745.05 (Bangladeshi Taka)
2015	Southeast Bank (x6605)	₳211,412.00 (Bangladeshi Taka)
2015	UCB (x0067/x0110)	₳1,824,192.37 (Bangladeshi Taka)
2015	UCB (x6230/x0371)	₳250,446.00 (Bangladeshi Taka)
2015	Bank Asia (x4668)	₳2,666,931.75 (Bangladeshi Taka)
2016	UCB (x0211)	₳392,849.43 (Bangladeshi Taka)
2016	Bank Asia (x4668)	₳3,998,129.17 (Bangladeshi Taka)
2016	BRAC Bank (x9001)	₳1,039,539.81 (Bangladeshi Taka)
2016	Dutch-Bangla Bank (x1130)	₳686,824.96 (Bangladeshi Taka)
2016	Dutch-Bangla Bank (x2804)	₳3,349,904.36 (Bangladeshi Taka)
2016	HSBC Bangladesh (x6013)	₳6,556,910.80 (Bangladeshi Taka)
2016	HSBC Bangladesh (x6069)	₳121,839.02 (Bangladeshi Taka)
2016	MTB (x4694)	₳869,135.00 (Bangladeshi Taka)
2016	One Bank (x1008)	₳4,049,084.91 (Bangladeshi Taka)
2016	One Bank (x1026)	₳3,509,338.85 (Bangladeshi Taka)
2016	Pubali Bank (x7201)	₳704,649.12 (Bangladeshi Taka)
2016	Pubali Bank (x7214)	₳1,250,006.52 (Bangladeshi Taka)

Calendar Year	Foreign Financial Account	High Balance
2016	Southeast Bank (x6605)	₳127,678.00 (Bangladeshi Taka)
2016	UCB (x0067/x0110)	₳2,779,611.71 (Bangladeshi Taka)
2016	UCB (x6230/x0371)	₳249,096.00 (Bangladeshi Taka)

49. On or about the due dates set forth below, in the Eastern District of Virginia and elsewhere, the defendant, **Azizur Rahman**, a resident of Herndon, Virginia, did willfully fail to file with the Commissioner of Internal Revenue an FBAR disclosing that he had an interest in, and signature and other authority over, a bank, securities, and other financial account in a foreign country, as follows:

Count	Calendar Year	Due Date of FBAR
15	2014	June 30, 2015
16	2015	June 30, 2016
17	2016	October 18, 2017

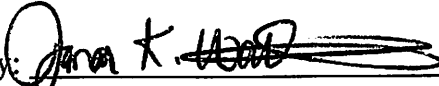
All in violation of Title 31, United States Code, Sections 5314 & 5322(a); and Title 31 Code of Federal Regulations, Sections 1010.350, 1010.306(c)-(d), and 1010.840(b) (formerly Title 31 Code of Federal Regulations, Sections 103.24, 103.27(c)-(d), and 103.59(b)).

A TRUE BILL
Pursuant to the E-Government Act,
the original of this page has been filed
under seal in the Clerk's Office.

Foreperson

Raj Parekh
Acting United States Attorney

David Hubbert
Deputy Assistant Attorney General
Tax Division, Criminal Enforcement Section

By: 
Sean Beaty
Brian E. Flanagan
Trial Attorneys, Tax Division
Criminal Enforcement Section
Jamar K. Walker
Assistant United States Attorney