

FILED

JUN 29 2011

SUPERIOR COURT
CLERK'S OFFICE

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

State Grand Jury

Number SGJ608-11-1

Superior Court 11-06-00074-S
Docket Number

STATE OF NEW JERSEY)
)
 v.)
)
 FAZAL DIN)
)
 RAJENDRA PATEL)
)
 KULWINDER DHALI WAL SINGH)
)
 NEELAM TIBREWAL)
)
 RAHILA KHAN)
)
 NATIONAL FREIGHT D/B/A)
 PRP ENTERPRISES)
)
 NATIONAL FREIGHT SOLUTIONS,)
 LLC.,)
)
 DIAMOND FREIGHT SOLUTIONS,)
 LLC.,)
)
 GOLDEN STAR EXPRESS)
 CORPORATION D/B/A PRIME TIME)
 FREIGHT)
)
 and)
)
 PRP ENTERPRISES)
)

INDICTMENT

The Grand Jurors of and for the State of New Jersey, upon
their oaths, present that:

COUNT ONE

(Conspiracy - First Degree)

FAZAL DIN

RAJENDRA PATEL

KULWINDER DHALIWAL SINGH

NATIONAL FREIGHT D/B/A PRP ENTERPRISES

NATIONAL FREIGHT SOLUTIONS, LLC

DIAMOND FREIGHT SOLUTIONS, LLC

GOLDEN STAR EXPRESS CORPORATION D/B/A PRIME TIME FREIGHT

and

PRP ENTERPRISES

between on or about April 17, 2009 and on or about May 31, 2010, at the Township of Edison, in the County of Middlesex, and at the City of Jersey City, in the County of Hudson, elsewhere, and within the jurisdiction of this Court, with the purpose of promoting or facilitating the commission of the crimes of Theft by Deception, and Money Laundering, did agree with persons whose identities are known to the Grand Jurors, who are named coconspirators but not as defendants herein, that:

A. One or more of them would engage in conduct which would constitute the aforesaid crimes, or an attempt or solicitation to commit such crimes; or

~~B. One or more of them would aid in the planning, attempt,~~
solicitation, or commission of the aforesaid crimes, that is:

1. Theft by Deception, in that one or more of them would purposely obtain property of another by deception, by creating or reinforcing a false impression, in an amount of \$75,000 or more, contrary to the provisions of N.J.S.A. 2C:20-4(a);

2. Financial Facilitation of Criminal Activity, in that one or more of them would engage in a transaction involving property, in an amount of \$500,000 or more, known or which a reasonable person would believe to be derived from criminal activity, with the intent to facilitate or promote the criminal activity, contrary to the provisions of N.J.S.A. 2C:21-25(b)(1); and

3. Financial Facilitation of Criminal Activity, in that one or more of them would engage in a transaction involving property, in an amount of \$500,000 or more, known or which a reasonable person would believe to be derived from criminal activity, knowing that the transaction was designed in whole or in part to conceal or disguise the nature, location, source, ownership or control of the property derived from criminal activity, contrary to the provisions of N.J.S.A. 2C:21-25b(2)(a).

All contrary to the provisions of N.J.S.A. 2C:5-2, N.J.S.A. 2C:2-6, N.J.S.A. 2C:2-7, and against the peace of this State, the government and dignity of the same.

COUNT TWO

(Theft by Deception - Second Degree)

FAZAL DIN

~~RAJENDRA PATEL~~

KULWINDER DHALIWAL SINGH

NATIONAL FREIGHT D/B/A PRP ENTERPRISES

NATIONAL FREIGHT SOLUTIONS, LLC

DIAMOND FREIGHT SOLUTIONS, LLC

GOLDEN STAR EXPRESS CORPORATION D/B/A PRIME TIME FREIGHT

and

PRP ENTERPRISES

between on or about April 17, 2009 and on or about May 31, 2010, at the Township of Edison, in the County of Middlesex, and at the City of Jersey City, in the County of Hudson, elsewhere, and within the jurisdiction of this Court, purposely did obtain the property of another by deception, in an amount of \$75,000 or more, by creating or reinforcing the false impression that invoices and other supporting documentation they submitted to Freight Brokers whose names are known to the Grand Jurors represented money that was due and owing for legitimate costs and expenses incurred by the said FAZAL DIN, RAJENDRA PATEL, KULWINDER DHALIWAL SINGH, NATIONAL FREIGHT D/B/A PRP ENTERPRISES, NATIONAL FREIGHT SOLUTIONS, LLC, DIAMOND FREIGHT SOLUTIONS, LLC, GOLDEN STAR EXPRESS CORPORATION D/B/A PRIME TIME FREIGHT, and PRP

ENTERPRISES, in an amount of \$75,000 or more,

WHEREAS IN TRUTH AND IN FACT, as the said FAZAL DIN, RAJENDRA PATEL, KULWINDER DHALIWAL SINGH, NATIONAL FREIGHT D/B/A PRP ENTERPRISES, NATIONAL FREIGHT SOLUTIONS, LLC, DIAMOND FREIGHT SOLUTIONS, LLC, GOLDEN STAR EXPRESS CORPORATION D/B/A PRIME TIME FREIGHT, and PRP ENTERPRISES well knew, the invoices and other supporting documentation they submitted to Freight Brokers whose names are known to the Grand Jurors, did not represent money that was due and owing for legitimate costs and expenses, all contrary to the provisions of N.J.S.A. 2C:20-4 and N.J.S.A. 2C:2-6, N.J.S.A. 2C:2-7, and against the peace of this State, the government and dignity of the same.

COUNT THREE

(Financial Facilitation of Criminal Activity - First Degree)

FAZAL DIN

RAJENDRA PATEL

KULWINDER DHALI WAL SINGH

NATIONAL FREIGHT D/B/A PRP ENTERPRISES

NATIONAL FREIGHT SOLUTIONS, LLC

DIAMOND FREIGHT SOLUTIONS, LLC

GOLDEN STAR EXPRESS CORPORATION D/B/A PRIME TIME FREIGHT

and

PRP ENTERPRISES

between on or about April 17, 2009 and on or about May 31, 2010, at the Township of Edison, in the County of Middlesex, and at the City of Jersey City, in the County of Hudson, elsewhere, and within the jurisdiction of this Court, knowingly did engage in transactions involving property known to be derived from criminal activity, in an amount of \$500,000 or more, with the intent to facilitate or promote the criminal activity; that is, the said FAZAL DIN, RAJENDRA PATEL, KULWINDER DHALI WAL SINGH, NATIONAL FREIGHT D/B/A PRP ENTERPRISES, NATIONAL FREIGHT SOLUTIONS, LLC, DIAMOND FREIGHT SOLUTIONS, LLC, GOLDEN STAR EXPRESS CORPORATION D/B/A PRIME TIME FREIGHT, and PRP ENTERPRISES, did engage in transactions involving the proceeds derived from the submission of falsified freight invoices and other supporting documentation

in an aggregate amount of \$500,000 or more, which the said FAZAL
DIN, RAJENDRA PATEL, KULWINDER DHALIWAL SINGH, NATIONAL FREIGHT
D/B/A PRP ENTERPRISES, NATIONAL FREIGHT SOLUTIONS, LLC, DIAMOND
FREIGHT SOLUTIONS, LLC, GOLDEN STAR EXPRESS CORPORATION D/B/A
PRIME TIME FREIGHT, and PRP ENTERPRISES knew to be derived
through theft by deception, with the intent to facilitate or
promote the criminal activity, contrary to the provisions of
N.J.S.A. 2C:21-25b(1), N.J.S.A. 2C:2-6, N.J.S.A. 2C:2-7, and
against the peace of this State, the government and dignity of
the same.

COUNT FOUR

(Financial Facilitation of Criminal Activity - First Degree)

FAZAL DIN

RAJENDRA PATEL

KULWINDER DHALIWAL SINGH

NATIONAL FREIGHT D/B/A PRP ENTERPRISES

NATIONAL FREIGHT SOLUTIONS, LLC

DIAMOND FREIGHT SOLUTIONS, LLC

GOLDEN STAR EXPRESS CORPORATION D/B/A PRIME TIME FREIGHT

and

PRP ENTERPRISES

between on or about April 17, 2009 and on or about May 31, 2010, at the Township of Edison, in the County of Middlesex, and at the City of Jersey City, in the County of Hudson, elsewhere, and within the jurisdiction of this Court, did engage in transactions involving property, in an amount of \$500,000 or more, known or which a reasonable person would believe to be derived from criminal activity, knowing that the transaction was designed in whole or in part to conceal or disguise the nature, location, source, ownership or control of the property derived from criminal activity, that is the said FAZAL DIN, RAJENDRA PATEL, KULWINDER DHALIWAL SINGH, NATIONAL FREIGHT D/B/A PRP ENTERPRISES, NATIONAL FREIGHT SOLUTIONS, LLC, DIAMOND FREIGHT SOLUTIONS, LLC, GOLDEN STAR EXPRESS CORPORATION D/B/A PRIME TIME FREIGHT, and PRP

ENTERPRISES did engage in the transactions of cash and check deposits, issuing checks, personal loan payments, cash withdrawals, automatic teller machine withdrawals, and wire transfers, in an amount of \$500,000 or more, known to be derived from criminal activity, knowing that the transactions were designed in whole or in part to conceal or disguise the nature, location, source, ownership or control of the property which the said FAZAL DIN, RAJENDRA PATEL, KULWINDER DHALIWAL SINGH, NATIONAL FREIGHT D/B/A PRP ENTERPRISES, NATIONAL FREIGHT SOLUTIONS, LLC, DIAMOND FREIGHT SOLUTIONS, LLC, GOLDEN STAR EXPRESS CORPORATION D/B/A PRIME TIME FREIGHT, and PRP ENTERPRISES knew to be derived from criminal activity, contrary to the provisions of N.J.S.A. 2C:21-25(b)(2)(a) and N.J.S.A. 2C:2-6, N.J.S.A. 2C:2-7, and against the peace of this State, the government and dignity of the same.

COUNT FIVE

(Failure to File Gross Income Tax Return - Third Degree)

KULWINDER DHALIWAL SINGH

and

NEELAM TIBREWAL

between on or about April 15, 2010, and on or about October 15, 2010, at the Township of Monroe, in the County of Middlesex, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, did fail to file tax returns or reports as required by the provisions of any State tax law with the intent to defraud the State or to evade, avoid or otherwise not make timely payment of any tax, fee, penalty, interest or any part thereof due pursuant to the provisions of the State Uniform Tax Procedure Law, N.J.S.A. 54:48-1 et seq., as amended and supplemented, or any State tax law, that is, the said KULWINDER DHALIWAL SINGH and NEELAM TIBREWAL, did fail to file a gross income tax return, FORM NJ-1040, required to be filed pursuant to the provisions of N.J.S.A. 54A:8-1, with the intent to defraud or evade payment or any part thereof of New Jersey gross income tax, for the tax year ending 2009 to the Director of the Division of Taxation in the Department of the Treasury of the State of New Jersey, contrary to the provisions of N.J.S.A. 54:52-8, and against the peace of the State, the government and dignity of the same.

COUNT SIX

(Failure to File Gross Income Tax Return - Third Degree)

FAZAL DIN

and

RAHILA KHAN

between on or about April 15, 2010, and on or about October 15, 2010, at the Township of South Brunswick, in the County of Middlesex, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, did fail to file tax returns or reports as required by the provisions of any State tax law with the intent to defraud the State or to evade, avoid or otherwise not make timely payment of any tax, fee, penalty, interest or any part thereof due pursuant to the provisions of the State Uniform Tax Procedure Law, N.J.S.A. 54:48-1 et seq., as amended and supplemented, or any State tax law, that is, the said FAZAL DIN and RAHILA KHAN, did fail to file a gross income tax return, FORM NJ-1040, required to be filed pursuant to the provisions of N.J.S.A. 54A:8-1, with the intent to defraud or evade payment or any part thereof of New Jersey gross income tax, for the tax year ending 2009 to the Director of the Division of Taxation in the Department of the Treasury of the State of New Jersey, contrary to the provisions of N.J.S.A. 54:52-8, and against the peace of the State, the government and dignity of the same.

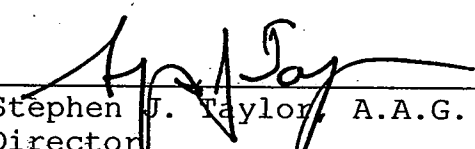
COUNT SEVEN

(Failure to File Gross Income Tax Return - Third Degree)

RAJENDRA PATEL

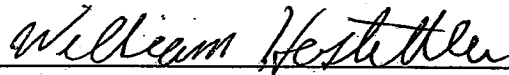
between on or about April 15, 2010, and on or about October 15, 2010, at the City of Jersey City, in the County of Hudson, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, did fail to file tax returns or reports as required by the provisions of any State tax law with the intent to defraud the State or to evade, avoid or otherwise not make timely payment of any tax, fee, penalty, interest or any part thereof due pursuant to the provisions of the State Uniform Tax Procedure Law, N.J.S.A. 54:48-1 et seq., as amended and supplemented, or any State tax law, that is, the said RAJENDRA PATEL did fail to file a gross income tax return, FORM NJ-1040, required to be filed pursuant to the provisions of N.J.S.A. 54A:8-1, with the intent to defraud or evade payment or any part thereof of New Jersey gross income tax, for the tax year ending 2009 to the Director of the Division of Taxation in the

Department of the Treasury of the State of New Jersey, contrary to the provisions of N.J.S.A. 54:52-8, and against the peace of the State, the government and dignity of the same.



Stephen J. Taylor, A.A.G.
Director
Division of Criminal Justice

A TRUE BILL:



6-29-11

Foreperson

FILED

JUN 29 2011

SUPERIOR COURT OF NEW JERSEY
SUPERIOR COURT LAW DIVISION - CRIMINAL
CLERK'S OFFICE

State Grand Jury

Number SGJ608-11-1

Superior Court

Docket Number 11-06-00074-S

STATE OF NEW JERSEY)

v.)

ORDER OF VENUE

FAZAL DIN)

RAJENDRA PATEL)

KULWINDER DHALIWAL SINGH)

NEELAM TIBREWAL)

RAHILA KHAN)

NATIONAL FREIGHT D/B/A)
PRP ENTERPRISES)

NATIONAL FREIGHT SOLUTIONS,)
LLC.,)

DIAMOND FREIGHT SOLUTIONS,)
LLC.,)

GOLDEN STAR EXPRESS)
CORPORATION D/B/A PRIME TIME)
FREIGHT)

and

PRP ENTERPRISES)

An Indictment having been returned to this Court by the
State Grand Jury in the above captioned matter,

IT IS ORDERED on this 29th day of June, 2011,
pursuant to paragraph 8 of the State Grand Jury Act, that the

County of Hudson be and hereby is designated as the County of venue for the purpose of trial.

IT IS FURTHER ORDERED that the Clerk of the Superior Court shall transmit forthwith the Indictment in this matter and a certified copy of this Order to the Criminal Division Manager of the County of Hudson for filing.


Pedro J. Jimenez, Jr., J.S.C.