

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK  
- - - - - x

UNITED STATES OF AMERICA :  
 :  
 -v- :  
 :  
 SABJA KHIMANI, :  
 RIYAZ MAZCURI, :  
 a/k/a "The Doctor," :  
 RASHMIKANT PATEL, and :  
 MEHMOOD HASSANALI DHANANI, :  
 a/k/a "Sam," :  
 a/k/a "Mehmoob," :  
 :  
 Defendants. :  
 - - - - - x

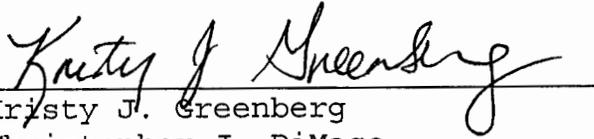
NOLLE PROSEQUI  
14 Cr. 455 (PGG)

1. The filing of this *nolle prosequi* will dispose of this case with respect to the defendants SABJA KHIMANI, RIYAZ MAZCURI, a/k/a "The Doctor," RASHMIKANT PATEL, and MEHMOOD HASSANALI DHANANI, a/k/a "Sam," a/k/a "Mehmoob."

2. On July 9, 2014, SABJA KHIMANI, RIYAZ MAZCURI, a/k/a "The Doctor," RASHMIKANT PATEL, and MEHMOOD HASSANALI DHANANI, a/k/a "Sam," a/k/a "Mehmoob," the defendants, were charged in Indictment 14 Cr. 455 with conspiracy to commit forced labor, in violation of Title 18, United States Code, Section 1594; conspiracy to commit visa fraud, in violation of Title 18, United States Code, Section 371; and conspiracy to commit fraud in foreign labor contracting, in violation of Title 18, United States Code, Section 371. PATEL also was charged with visa fraud, in violation of Title 18, United States Code, Section 1546.

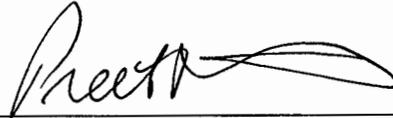
3. We have recently learned additional facts that call into question certain information that had been relied upon at the time of the Indictment and that undermine the credibility of witnesses the Government had expected to call at trial. Based on a review of the evidence in the case and information acquired subsequent to the filing of the Indictment, the Government has concluded that further prosecution of SABJA KHIMANI, RIYAZ MAZCURI, a/k/a "The Doctor," RASHMIKANT PATEL, and MEHMOOD HASSANALI DHANANI, a/k/a "Sam," a/k/a "Mehmoob," the defendants, would not be in the interests of justice.

4. Accordingly, in light of the foregoing, I recommend that an order of *nolle prosequi* be filed as to SABJA KHIMANI, RIYAZ MAZCURI, a/k/a "The Doctor," RASHMIKANT PATEL, and MEHMOOD HASSANALI DHANANI, a/k/a "Sam," a/k/a "Mehmoob," the defendants, with respect to Indictment 14 Cr. 455.

  
Kristy J. Greenberg  
Christopher J. DiMase  
Assistant United States Attorneys  
(212) 637-2469/2433

Dated: New York, New York  
March 26, 2015

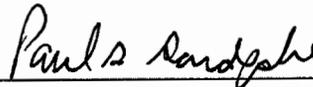
Upon the foregoing recommendation, I hereby direct, with leave of the Court, that an order of *nolle prosequi* be filed as to SABJA KHIMANI, RIYAZ MAZCURI, a/k/a "The Doctor," RASHMIKANT PATEL, and MEHMOOD HASSANALI DHANANI, a/k/a "Sam," a/k/a "Mehmoob," the defendants, with respect to Indictment 14 Cr. 455.



PREET BHARARA <sup>(18)</sup>  
United States Attorney  
Southern District of New York

Dated: New York, New York  
March 26, 2015

SO ORDERED:



HON. PAUL G. GARDEPHE  
United States District Judge  
Southern District of New York

Dated: New York, New York  
March 30, 2015