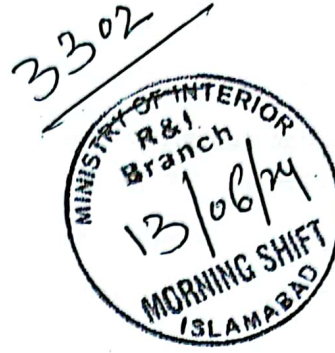


Date: 13 May 2024

The Secretary  
The Ministry of Interior (Government of Pakistan)  
Islamabad



**Subject: Enquiry No. 222/23 FIA AMLC Lahore  
Evidence regarding violation of Section 4, 5, 6, 8, 23 of the Foreign Exchange Regulation Act 1947 regarding USD \$10.0 million cross-border money laundering.**

Honorable Secretary,

Please refer to Enquiry No. 222/23 FIA AMLC Lahore. I request you to direct FIA AMLC Lahore to duly investigate & consider the attached evidence. Certain senior officers within AMLC Lahore are interfering with the investigation under influence of the accused.

The purpose of this letter is to provide additional evidence regarding an alleged illegal transfer of US Dollars \$997,565.50 via hawala/hundi from Pakistan to UAE and USA in violation of Section 4, 5, 6, 8, 23 of the Foreign Exchange Regulation Act 1947.

A formal complaint regarding money laundering of USD \$ 10.0 million was initiated by the undersigned via Pakistan Embassy in Washington DC and FBI (regional office Miami, USA). Pakistan Embassy routed the complaint via the Ministry of Foreign Affairs to the Ministry of Interior and subsequently to FIA (AMLC Lahore).

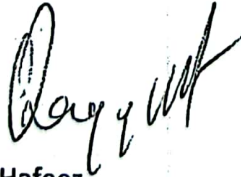
**Brief facts and evidence regarding the alleged illegal US Dollars \$997,565.50 transaction are following:**

- This illegal transaction was disguised as a past-due payments (more than 6 months past due) for ice cream imports. On Oct 22, 2020, AHG Flavours drafted 3 letters (Annex 1) to create a fake paper-trail
- **Per Pakistan's law - There is no legal way to conduct this cross-border payment because the State Bank of Pakistan prohibits payments of Imported goods 6 months after the date of import [ref: Clause 6 (ix) & 6 (xii) of Chapter 13 of Foreign Exchange Manual of the State Bank of Pakistan]. [www.sbp.org.pk/fe\\_manual/pdf/2016/Chapter-13.pdf](http://www.sbp.org.pk/fe_manual/pdf/2016/Chapter-13.pdf)**
- AHG Flavours handed over PKR 155,772,197 (equivalent to USD \$ 997,565.50) to Interlink Corporation in Lahore, Pakistan.

- i. PKR 98.0 million were given via 3 cheques from AHG Flavours account in Bank Al Habib (Acct No 0981 008167019 Cheque No. 10374734, 10374745, & 10378445).
  - ii. PKR 57.77 million were given in cash to Interlink Corporation  
AHG Flavours' accounts ledger showing cheques & cash amounts is **attached (Annex 2)**
- Interlink Corporation (Pakistan), acting as the front man for AHG Flavours send this amount (PKR 155,772,197) illegally from Pakistan to the United Arab Emirates (UAE) by:
    - i. Hawala/Hundi, and
    - ii. State Bank's EIF authorized to other importers
  - Interlink Trading FZC (a UAE based subsidiary of Interlink corporation) received the money in Dubai from Hundi/Hawala. The money was consolidated in Interlink Trading FZC's Dubai bank account (RAK Bank acct no. 8372664597902).
  - Interlink Trading FZC transferred USD \$ 997,565.50 to Baskin Robbins Dubai and New York bank accounts in a series of 5 transactions to avoid UAE & USA banking scrutiny (5 transactions attached as Annex 3).
  - Subsequently, it was declared as over-payment and/or payment made in errors and Baskin Robbins transferred the money back to Irfan Mustafa's bank accounts in Dubai & Switzerland.

I request that FIA investigate the paper trail of this transaction and cross reference the evidence from i) AHG Flavours accounts ledgers, ii) Bank Al Habib (acct. No. 0981 008167019), iii) Interlink Corporation and its bank account in Allied Bank, iv) State bank EIF records, v) importers whose EIF forms were illegally used for these transactions and vi) hundi/hawala agents in Lahore.

Sincerely,



Abdul Qayyum Hafeez  
House 16, Street 61, Sector F-7/4  
Islamabad  
Mobile: 0333 5252430

Enclosures: Annex 1, Annex 2, Annex 3

Oct 27, 2020

**BASKIN-ROBBINS FRANCHISING LLC,**  
PO Box 9141, Canton, Massachusetts 02021, USA ("BR")Re: BR's request for remittance of amounts against outstanding invoices

This is to confirm that M/s Interlink Trading FZC, PO Box 56743 Ras Al Khaimah, is our UAE freight forwarder through whom we have been receiving our consignments and making payments to BR.

We have requested M/s Interlink Trading FZC to make remittances against the following outstanding invoices aggregating a total amount of USD \$704,313.64, a copy of our payment request is attached for ready reference:

DBI Outstanding Balance		
Order Number	Description	Amount US\$
Pak 009-2019	Product Value	41,607.37
Pak 010-2019	Product Value	91,962.84
Pak 011-2019	Product Value	96,978.92
Pak 001-2020	Product Value	93,154.02
Pak 002-2020	Product Value	93,770.39
Pak 003-2020	Product Value	95,272.87
Pak 004-2020	Product Value	88,119.33
Pak 004-2020	International Freight	7,208.00
Pak 007-2020	Invoice	96,239.90
<b>Total Outstanding Balance</b>		<b>704,313.64</b>

Yours faithfully,

**AHG FLAVOURS (PVT) LTD****C.U.I.N. 0105114***Manager Finance*

For and on behalf of AHG Flavours (Pvt.) Limited.

Copy to: M/s Interlink Trading FZC.



Oct 27, 2020

M/S Interlink Trading FZC  
PO Box 56743  
Ras Al Khaimah, UAE

**RE: Payment request for the products bought from Dunkin' Brands International ("BR")**

The outstanding payment in the amount of USD \$704,313.64 is listed in detail in the table below. The commercial invoices for all outstanding invoices indicated in the table are attached with this letter.

DBI Outstanding Balance		
Order Number	Description	Amount US\$
Pak 009-2019	Product Value	41,607.37
Pak 010-2019	Product Value	91,962.84
Pak 011-2019	Product Value	96,978.92
Pak 001-2020	Product Value	93,154.02
Pak 002-2020	Product Value	93,770.39
Pak 003-2020	Product Value	95,272.87
Pak 004-2020	Product Value	88,119.33
Pak 004-2020	International Freight	7,208.00
Pak 007-2020	Invoice	96,239.90
<b>Total Outstanding Balance</b>		<b>704,313.64</b>

You are requested to transfer the entire amount of USD \$704,313.64 to BR. The account details are as follows.

Beneficiary Name: Dunkin' Brands International DMCC  
Bank Name: Citibank NA  
Street Address: OUD Metha Road Al Wasl Branch  
City, State, Country: Dubai  
SWIFT No.: CITIAEAD  
Account Number: AE120211000000100875012  
ABA No.: 100875012

Yours faithfully,

For and on behalf of  
AHG Flavours (Pvt.) Limited  
Encl: as above.

*Manager Finance*

**AHG FLAVOURS (PVT) LTD**  
**C.U.I.N. 0105114**

Interlink Trading FZC  
Supply Chain Management Company  
PO Box 56743, Ras Al Khaima, UAE



انترلينك ترديينغ ش-م-ح  
شركة لإدارة سلسلة التوريد  
ص ب ٥٦٧٤٣، رأس الخيمة الامارات العربية المتحدة

Oct 27, 2020

**BASKIN-ROBBINS FRANCHISING LLC,**  
PO Box 9141, Canton, Massachusetts 02021, USA ("BR")

Re: BR's request for remittance of amounts against outstanding invoices

This is to confirm that we are the UAE freight forwarder of AHGFlavours (Pvt.) Limited of 79 Aurangzeb Block, New Garden Town Lahore Pakistan ("Franchisee") on whose behalf we have been receiving consignments and making payments to BR.

We have been requested by the Franchisee to make remittances against the following outstanding invoices aggregating a total amount of USD \$704,313.64, a copy of our payment request is attached for ready reference:

DBI Outstanding Balance		
Order Number	Description	Amount US\$
Pak 009-2019	Product Value	41,607.37
Pak 010-2019	Product Value	91,962.84
Pak 011-2019	Product Value	96,978.92
Pak 001-2020	Product Value	93,154.02
Pak 002-2020	Product Value	93,770.39
Pak 003-2020	Product Value	95,272.87
Pak 004-2020	Product Value	88,119.33
Pak 004-2020	International Freight	7,208.00
Pak 007-2020	Invoice	96,239.90
<b>Total Outstanding Balance</b>		<b>704,313.64</b>

We will be remitting the funds accordingly.

Yours faithfully,

For and on behalf of M/s Interlink Trading FZC.

Copy to: AHGFlavours (Pvt.) Limited

Tel: +971 (0) 7 203 1445 Fax: +971 (0) 7 203 1446

www.ilt.ae

Facebook/InterlinkTradingFZC info@ilt.ae

A limited liability free zone company / establishment incorporated pursuant to the Rules & Regulations of Ras Al Khaimah Free Trade Zone Authority.  
شركة / مؤسسة منطقة حرة ذات مسؤولية محدودة، تأسست وفقاً للقواعد والأنظمة من المنطقة الحرة برأس الخيمة.

**AHG Flavours Pvt Ltd**  
**Account QuickReport**  
 All Transactions

Date	Num	Name	Memo	Amount	Mode of Payments
<b>Advances for Import</b>					
<b>DBI Interlink Corporation \$</b>					
10/20/2020	CPV-Oct-83	Head Office	Cash paid agst Import DBI Payment USD 25000 @ 165 (Khalifa - Interlink )	4,125,000.00	Cash
10/27/2020	CPV-Oct-109	Head Office	Cash paid to DBI Interlink Corporation (\$270,152.73*Rs.168) agst Import	395,659.00	Cash
10/27/2020	BPV-Oct-89	Head Office	Chq#10374724 Issue to DBI Interlink Corporation (\$270,152.73*Rs.168) agst Import	45,000,000.00	Bank
11/04/2020	CPV-K-Nov-3	Head Office	Cash paid to DBI Interlink Corporation (\$204161*Rs.178.03) agst DBI Import	9,195,229.00	Cash
11/04/2020	BPV-Nov-07	Head Office	Chq#10374745 issue to DBI Interlink Corporation (\$204161*Rs.178.03) agst DBI Import	28,000,000.00	Bank
11/05/2020	CPV-Nov-12	Head Office	DBI Interlink payment paid agst Import (100,000.00@168.63)	16,863,000.00	Cash
11/12/2020	CPV-Nov-38	Head Office	Cash Paid to Interlink Corporation \$275000@174 for IFF and PAK-12-2020	22,850,000.00	Cash
11/14/2020	BPV-Nov-49	Head Office	Chq#10378445 issue to DBI Interlink \$ 275000@ Rs.174 Agst Import Payment	25,000,000.00	Bank
11/27/2020	CPV-Nov-55	Head Office	\$143678.16@174 already paid at 174 and paid on revised rate@177.1519721.77@177 for IFF	963,309.00	Cash
11/30/2020	CPV-Nov-52	Karachi Office	Cash paid To Interlink Corporation Limited	3,000,000.00	Cash
03/03/2021	CPV-Mar-05	Head Office	Remaining Bal Cash paid to Interlink Corporation Limited agst product value bal paid	390,000.00	Cash
<b>Total DBI Interlink Corporation \$</b>				<b>155,772,197.00</b>	

**Cheques Issued:**

Bank Al Habib — Bank Account No. 0981 008167019      Cheque No. 10374734      PKR 45,000,000  
 Bank Al Habib — Bank Account No. 0981 008167019      Cheque No. 10374745      PKR 28,000,000  
 Bank Al Habib — Bank Account No. 0981 008167019      Cheque No. 10378445      PKR 25,000,000  
 Amount Paid in Cash      PKR 57,772,197

**TOTAL PAYMENT**

**PKR 155,772,197**

Date: 16-11-2020

INTERLINK TRADING FZC  
PARTNER  
INTERLINK TRADING FZC  
RAS AL KHAIMAH, UNITED ARAB EMIRATES

**OUTWARD REMITTANCE ADVICE**  
**OUR REFERENCE: 000041822688**

As per your instructions we advise having initiated the outward remittance to the debit of your account XXXXXXXX597902 as below:

**Remittance Details**

Charges on Remittance	USD 17.67	Exchange Rate	1.000000
Cost of Remittance	USD 200,000.00	Value Date	16-11-2020
Amount Remitted	USD 200,000.00		
Other Bank's Charges	OUR		

**Beneficiary Bank Details**

Bank SWIFT Code	CITIAEADXXX
Bank Name and Address	CITIBANK, ABU DHABI

**Beneficiary Details**

Beneficiary Account Number	AE120211000000100875012
Beneficiary Name and Address	DUNKIN BRANDS INTERNATIONAL DMCC

**Purpose of Payment**

GOODS BOUGHT

**Correspondent Bank Details**

Our Paying Bank SWIFT Code	CITIUS33XXX
Intermediary Bank SWIFT Code / Name	

If you have any query or require any clarification, please contact our Call Centre on +971-4-213 00 00

This advice should not be construed as confirmation of the outward remittance having been completed. Please note that Bank reserves rights to decline the transaction as per applicable Terms and Conditions. All remittances are processed subject to the Bank's Terms and Conditions

Please be advised that, as per Central Bank guidelines, credit to accounts held in banks operating in UAE will be effected solely based on the beneficiary IBAN. All other information provided such as the beneficiary name and other details will not be used.

**System generated advice - no signature required.**

The National Bank of Ras Al-Khaimah (P.S.C.)  
P.O. Box 5300, Ras Al-Khaimah, UAE

بنك رأس الخيمة الوطني (ش.م.ع)

Date: 17-11-2020

INTERLINK TRADING FZC  
PARTNER  
INTERLINK TRADING FZC  
RAS AL KHAIMAH, UNITED ARAB EMIRATES

**OUTWARD REMITTANCE ADVICE**  
**OUR REFERENCE: 000041860363**

As per your instructions we advise having initiated the outward remittance to the debit of your account XXXXXXX597902 as below:

**Remittance Details**

Charges on Remittance	USD 17.67	Exchange Rate	1.000000
Cost of Remittance	USD 200,000.00	Value Date	17-11-2020
Amount Remitted	USD 200,000.00		
Other Bank's Charges	OUR		

**Beneficiary Bank Details**

Bank SWIFT Code	CITIAEADXXX
Bank Name and Address	CITIBANK, ABU DHABI

**Beneficiary Details**

Beneficiary Account Number	AE120211000000100875012
Beneficiary Name and Address	DUNKIN BRANDS INTERNATIONAL DMCC, *

**Purpose of Payment**

GOODS BOUGHT

**Correspondent Bank Details**

Our Paying Bank SWIFT Code	CITIUS33XXX
Intermediary Bank SWIFT Code / Name	

If you have any query or require any clarification, please contact our Call Centre on +971-4-213 00 00

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**System generated advice - no signature required.**

The National Bank of Ras Al-Khaimah (P.S.C.)  
P.O. Box 5300, Ras Al-Khaimah, UAE

بنك رأس الخيمة الوطني (ش.م.ع)



Date: 18-11-2020

INTERLINK TRADING FZC  
PARTNER  
INTERLINK TRADING FZC  
RAS AL KHAIMAH, UNITED ARAB EMIRATES

**OUTWARD REMITTANCE ADVICE**  
**OUR REFERENCE: 000041913254**

As per your instructions we advise having initiated the outward remittance to the debit of your account XXXXXXXX597902 as below:

**Remittance Details**

Charges on Remittance	USD 17.65	Exchange Rate	1.000000
Cost of Remittance	USD 200,000.00	Value Date	18-11-2020
Amount Remitted	USD 200,000.00		
Other Bank's Charges	OUR		

**Beneficiary Bank Details**

Bank SWIFT Code CITIAEADXXX  
Bank Name and Address CITIBANK, ABU DHABI

**Beneficiary Details**

Beneficiary Account Number AE120211000000100875012  
Beneficiary Name and Address DUNKIN BRANDS INTERNATIONAL, DMCC

**Purpose of Payment**

GOODS BOUGHT

**Correspondent Bank Details**

Our Paying Bank SWIFT Code CITIUS33XXX  
Intermediary Bank SWIFT Code / Name

If you have any query or require any clarification, please contact our Call Centre on +971-4-213 00 00

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**System generated advice - no signature required.**

The National Bank of Ras Al-Khaimah (P.S.C.)  
P.O. Box 5300, Ras Al-Khaimah, UAE

بنك رأس الخيمة الوطني (ش.م.ع.)

Date: 19-11-2020

INTERLINK TRADING FZC  
PARTNER  
INTERLINK TRADING FZC  
RAS AL KHAIMAH, UNITED ARAB EMIRATES

**OUTWARD REMITTANCE ADVICE**  
**OUR REFERENCE: 000041954340**

As per your instructions we advise having initiated the outward remittance to the debit of your account XXXXXXXX597902 as below:

**Remittance Details**

Charges on Remittance	USD 17.65	Exchange Rate	1.000000
Cost of Remittance	USD 199,314.73	Value Date	19-11-2020
Amount Remitted	USD 199,314.73		
Other Bank's Charges	OUR		

**Beneficiary Bank Details**

Bank SWIFT Code	CITIAEADXXX
Bank Name and Address	CITIBANK, ABU DHABI

**Beneficiary Details**

Beneficiary Account Number	AE120211000000100875012
Beneficiary Name and Address	DUNKIN BRANDS INTERNATIONAL DMCC, *

**Purpose of Payment**

GOODS BOUGHT

**Correspondent Bank Details**

Our Paying Bank SWIFT Code	CITIUS33XXX
Intermediary Bank SWIFT Code / Name	

If you have any query or require any clarification, please contact our Call Centre on +971-4-213 00 00

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**System generated advice - no signature required.**

The National Bank of Ras Al-Khaimah (P.S.C.)  
P.O. Box 5300, Ras Al-Khaimah, UAE

بنك رأس الخيمة الوطني (ش.م.ع)

Date: 24-11-2020

INTERLINK TRADING FZC  
PARTNER  
INTERLINK TRADING FZC  
RAS AL KHAIMAH, UNITED ARAB EMIRATES

**OUTWARD REMITTANCE ADVICE**  
**OUR REFERENCE: 000042123488**

As per your instructions we advise having initiated the outward remittance to the debit of your account XXXXXXX597902 as below:

**Remittance Details**

Charges on Remittance	USD 17.65	Exchange Rate	1.000000
Cost of Remittance	USD 198,250.77	Value Date	24-11-2020
Amount Remitted	USD 198,250.77		
Other Bank's Charges	OUR		

**Beneficiary Bank Details**

Bank SWIFT Code CITIUS33XXX  
Bank Name and Address CITIBANK, NEW YORK, UNITED STATES

**Beneficiary Details**

Beneficiary Account Number 40762667  
Beneficiary Name and Address DB MASTER FINANCE LLC, \*

**Purpose of Payment**

GOODS BOUGHT

**Correspondent Bank Details**

Our Paying Bank SWIFT Code CITIUS33XXX  
Intermediary Bank SWIFT Code / Name

If you have any query or require any clarification, please contact our Call Centre on +971-4-213 00 00

This advice should not be construed as confirmation of the outward remittance having been completed. Please note that Bank reserves rights to decline the transaction as per applicable Terms and Conditions. All remittances are processed subject to the Bank's Terms and Conditions

Please be advised that, as per Central Bank guidelines, credit to accounts held in banks operating in UAE will be effected solely based on the beneficiary IBAN. All other information provided such as the beneficiary name and other details will not be used.

**System generated advice - no signature required.**

The National Bank of Ras Al-Khaimah (P.S.C.)  
P.O. Box 5300, Ras Al-Khaimah, UAE

بنك رأس الخيمة الوطني (ش.م.ع)