

INDICTMENT
SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF QUEENS

THE PEOPLE OF THE STATE OF NEW YORK

-against-

1. IRFAN SYED,

2. [REDACTED]

3. BEAU BAER,

Defendants.

Filed:

INDICTMENT NO. 2737-2025

STATE OF NEW YORK OFFICE
OF THE ATTORNEY GENERAL

PUBLIC INTEGRITY BUREAU

COUNTS

P. L. § 105.10(1)

CONSPIRACY IN THE
FOURTH DEGREE

Irfan Syed (1)

[REDACTED]
Beau Baer (1)

P. L. § 105.00

CONSPIRACY IN THE
SIXTH DEGREE

Irfan Syed (2)

[REDACTED]
Beau Baer (2)

P. L. § 470.15(1)(b)(ii)(A)

MONEY LAUNDERING IN
IN THE SECOND DEGREE

Irfan Syed (3)

[REDACTED]
Beau Baer (3)

P. L. § 190.65(1)(b)

SCHEME TO DEFRAUD
IN THE FIRST DEGREE

Irfan Syed (4)

[REDACTED]
Beau Baer (4)

P. L. § 180.00

COMMERCIAL BRIBING
IN THE SECOND DEGREE

Irfan Syed (5)

[REDACTED]
Beau Baer (5)

P. L. § 175.10

FALSIFYING BUSINESS
RECORDS IN THE FIRST
DEGREE

Irfan Syed (6-14)

[REDACTED]

A TRUE BILL

GRAND JURY FOREPERSON

LETITIA JAMES
ATTORNEY GENERAL
STATE OF NEW YORK

INTRODUCTION TO ALL COUNTS

On or about and in between January 3, 2018 and August 7, 2023, in the County of Queens, State of New York, and elsewhere in the State of New York, the defendants IRFAN SYED, [REDACTED], BEAU BEAR, and others both known and unknown, engaged in conspiracies to commit money laundering in the second degree and commercial bribing in the second degree by making illegal cash payments to an individual known to the Grand Jury who worked at DELTA AIRLINES (hereinafter, the “DELTA EMPLOYEE”), and to launder the bribe money through companies that were under their control. It was the goal of the conspiracy to:

- a. Generate money for members of the conspiracy through falsified invoices between IRFAN SYED’s company, JET WAY SECURITY AND INVESTIGATIONS, and [REDACTED] [REDACTED], ALLIANCE GROUND INTERNATIONAL;
- b. Ensure that both IRFAN SYED and [REDACTED]’s companies were retained by DELTA AIRLINES through quarterly cash payments to the DELTA EMPLOYEE;
- c. Split the proceeds of the procured DELTA AIRLINES contracts amongst members of the conspiracy;
- d. Conceal the true identities of ultimate recipients of proceeds of the criminal activity by fraudulent billings, which were in turn taken out in cash and distributed to the members of the conspiracy and the DELTA EMPLOYEE.

At all times relevant to the conspiracy, the conspirators intended to obtain and maintain contracts with DELTA AIRLINES at John F. Kennedy International Airport (hereinafter “JFK Airport”) in Queens, New York through quarterly cash payments to an influential, high-level DELTA AIRLINES employee (the “DELTA EMPLOYEE”). To hide the true nature and purpose of these cash payments, as well as to remove the money from their respective companies, conspirators would falsify quarterly invoices for consulting. That money would then be split three

ways between IRFAN SYED, [REDACTED], and the DELTA EMPLOYEE. Generally, BEAU BAER would hand the DELTA EMPLOYEE their third of the quarterly payment in cash onsite at JFK Airport. On other occasions, the conspirators and the DELTA EMPLOYEE would travel to other locations, such as Las Vegas, Nevada; Atlantic City, New Jersey; and Miami, Florida, in which case the cash payments would be handed to the DELTA EMPLOYEE by IRFAN SYED. The DELTA EMPLOYEE would also have his meals and other expenditures paid for by the conspirators during these trips.

i. The Defendants

Each charged defendant participated in and aided the other defendants, and others in the commission of the crimes and overt acts charged in the conspiracy. The commission of the crimes was planned with each participating defendant assuming specific roles in furtherance of the commission of the charged crimes.

IRFAN SYED is the Chief Executive Officer of Jet Way Security and Investigations LLC and Jet Way Aviation Services LLC (collectively hereinafter “JET WAY”). Through this company, IRFAN SYED provides security for various airlines, including their cargo departments, at JFK Airport.

[REDACTED] is the [REDACTED] of Alliance Ground International. Through this company, [REDACTED] manages and provides workforce for DELTA AIRLINES cargo department at JFK Airport.

BEAU BAER is a director-level employee at JET WAY and reports to IRFAN SYED.

At all times relevant to this conspiracy, the defendants used their control of their respective companies to conceal the true purpose of the payments to the DELTA EMPLOYEE, that purpose being to make illegal cash payments to the DELTA EMPLOYEE to maintain their lucrative

contracts with DELTA AIRLINES and JFK Airport at large. The named entities were used to conceal the defendants' receipt of funds generated from their crimes.

COUNT ONE

THE GRAND JURY OF THE COUNTY OF QUEENS, by this Indictment, accuses the defendants, IRFAN SYED, [REDACTED], and BEAU BAER of the crime of CONSPIRACY IN THE FOURTH DEGREE in violation of §105.10(1) of the Penal Law of the State of New York, committed as follows:

On or about and in between January 3, 2018 and August 7, 2023, both dates being approximate and inclusive, within Queens County, in the State of New York, and elsewhere, with intent that conduct constituting the crime of Money Laundering in the Second Degree, [Penal Law § 470.15(1)(b)(ii)(A)] a Class C Felony, be committed, the defendants knowingly and intentionally agreed with each other and with others, known and unknown, to engage in and cause the performance of such conduct as would constitute this Class C felony.

COUNT TWO

AND THE AFORESAID GRAND JURY, by this Indictment, accuses the defendants, IRFAN SYED, [REDACTED], and BEAU BAER of the crime of CONSPIRACY IN THE SIXTH DEGREE in violation of §105.00 of the Penal Law of the State of New York, committed as follows:

On or about and in between January 3, 2018 and August 7, 2023, both dates being approximate and inclusive, within Queens County, in the State of New York, and elsewhere, with intent that conduct constituting the crime of Commercial Bribing in the Second Degree, [Penal

Law § 180.00] a Class A Misdemeanor, be committed, the defendants knowingly and intentionally agreed with each other and with others, known and unknown, to engage in and cause the performance of such conduct as would constitute this Class A Misdemeanor.

OVERT ACTS

In the furtherance of the conspiracies set forth in Count One and Count Two, and to affect the objects thereof, on or about and in between approximately January 3, 2018, and August 7, 2023, the following overt acts, among others, were committed. Some of the following overt acts occurred within the County of Queens, in the State of New York:

1. On or about January 3, 2018, IRFAN SYED, through JET WAY, sent an invoice to [REDACTED] at ALLIANCE GROUND INTERNATIONAL for a subtotal of \$25,006.20. The subtotal represented money that would be split between IRFAN SYED, [REDACTED], and the DELTA EMPLOYEE.
2. On or about April 4, 2018, IRFAN SYED, through JET WAY, sent an invoice to [REDACTED] at ALLIANCE GROUND INTERNATIONAL for a subtotal of \$25,006.20. The subtotal represented money that would be split between IRFAN SYED, [REDACTED], and the DELTA EMPLOYEE.
3. On or about April 20, 2018, [REDACTED] requested a purchasing order from ALLIANCE GROUND INTERNATIONAL for the April 4, 2018 invoice from JET WAY, with a description that read “show expense as Consulting Fee.”
4. On or about July 4, 2018, IRFAN SYED, through JET WAY, sent an invoice to [REDACTED] at ALLIANCE GROUND INTERNATIONAL for a subtotal of \$25,006.20. The subtotal represented money that would be split between IRFAN SYED, [REDACTED], and the DELTA EMPLOYEE
5. On or about July 10, 2018, [REDACTED] requested a purchasing order from ALLIANCE GROUND INTERNATIONAL for the October 3, 2018 invoice from JET WAY, with a description that read “show expense as Consulting Fee.”

6. On or about October 3, 2018, IRFAN SYED, through JET WAY, sent an invoice to [REDACTED] at ALLIANCE GROUND INTERNATIONAL for a subtotal of \$25,006.20. The subtotal represented money that would be split between IRFAN SYED, [REDACTED], and the DELTA EMPLOYEE
7. On or about October 19, 2018, [REDACTED] requested a purchasing order from ALLIANCE GROUND INTERNATIONAL for the October 3, 2018 invoice from JET WAY, with a description that read “show expense as Consulting Fee.”
8. On or about January 30, 2019, IRFAN SYED, through JET WAY, sent an invoice to [REDACTED] at ALLIANCE GROUND INTERNATIONAL for a subtotal of \$25,006.20. The subtotal represented money that would be split between IRFAN SYED, [REDACTED], and the DELTA EMPLOYEE
9. On or about February 5, 2019, [REDACTED] requested a purchasing order from ALLIANCE GROUND INTERNATIONAL for the January 30, 2019 invoice from JET WAY, with a description that read “show expense as Consulting Fee.”
10. On or about February 5, 2019, [REDACTED] emailed an administrator at JET WAY and requested that the February 5, 2019, purchase order only be sent to [REDACTED] and no one else.
11. On or about April 17, 2019, IRFAN SYED, through JET WAY, sent an invoice to [REDACTED] at ALLIANCE GROUND INTERNATIONAL for a subtotal of \$25,006.20. The subtotal represented money that would be split between IRFAN SYED, [REDACTED], and the DELTA EMPLOYEE.
12. On or about April 18, 2019, [REDACTED] requested a purchasing order from ALLIANCE GROUND INTERNATIONAL for the April 17, 2019 invoice from JET WAY, with a description that read “show expense as Consulting Fee.”
13. On or about July 10, 2019, IRFAN SYED, through JET WAY, sent an invoice to [REDACTED] at ALLIANCE GROUND INTERNATIONAL for a subtotal of \$25,006.20. The subtotal represented money that would be split between IRFAN SYED, [REDACTED] and the DELTA EMPLOYEE
14. On or about July 17, 2019, [REDACTED] requested a purchasing order from ALLIANCE GROUND INTERNATIONAL for the July 10, 2019 invoice from JET WAY, with a description that read “show expense as Consulting Fee.”

15. On or about October 2, 2019, IRFAN SYED, through JET WAY, sent an invoice to [REDACTED] at ALLIANCE GROUND INTERNATIONAL for a subtotal of \$25,006.20. The subtotal represented money that would be split between IRFAN SYED, [REDACTED], and the DELTA EMPLOYEE.
16. On or about October 10, 2019, [REDACTED] requested a purchasing order from ALLIANCE GROUND INTERNATIONAL for the amount listed in the October 2, 2019 invoice from JET WAY.
17. On or about October 11, 2019, [REDACTED] emailed an individual at ALLIANCE GROUND INTERNATIONAL and requested that the October 10, 2019 purchase order number only be sent to [REDACTED] and no one else.
18. On or about January 1, 2020, IRFAN SYED, through JET WAY, sent an invoice to [REDACTED] at ALLIANCE GROUND INTERNATIONAL for a subtotal of \$25,006.20. The subtotal represented money that would be split between IRFAN SYED, [REDACTED], and the DELTA EMPLOYEE.
19. On or about April 1, 2020, IRFAN SYED, through JET WAY, sent an invoice to [REDACTED] at ALLIANCE GROUND INTERNATIONAL for a subtotal of \$25,006.20. The subtotal represented money that would be split between IRFAN SYED, [REDACTED] and the DELTA EMPLOYEE.
20. On or about July 8, 2020, IRFAN SYED, through JET WAY, sent an invoice to [REDACTED] at ALLIANCE GROUND INTERNATIONAL for a subtotal of \$25,006.20. The subtotal represented money that would be split between IRFAN SYED, [REDACTED], and the DELTA EMPLOYEE.
21. On or about October 7, 2020, IRFAN SYED, through JET WAY, sent an invoice to [REDACTED] at ALLIANCE GROUND INTERNATIONAL for a subtotal of \$25,006.20. The subtotal represented money that would be split between IRFAN SYED, [REDACTED], and the DELTA EMPLOYEE.
22. On or about January 6, 2021, IRFAN SYED, through JET WAY, sent an invoice to [REDACTED] at ALLIANCE GROUND INTERNATIONAL for a subtotal of \$25,006.20. The subtotal represented money that would be split between IRFAN SYED, [REDACTED], and the DELTA EMPLOYEE.
23. On or about April 7, 2021, IRFAN SYED, through JET WAY, sent an invoice to [REDACTED] at ALLIANCE GROUND INTERNATIONAL for a subtotal of \$25,006.20. The

subtotal represented money that would be split between IRFAN SYED, [REDACTED], and the DELTA EMPLOYEE.

24. On or about July 7, 2021, IRFAN SYED, through JET WAY, sent an invoice to [REDACTED] at ALLIANCE GROUND INTERNATIONAL for a subtotal of \$25,006.20. The subtotal represented money that would be split between IRFAN SYED, [REDACTED], and the DELTA EMPLOYEE.
25. On or about October 6, 2021, IRFAN SYED, through JET WAY, sent an invoice to [REDACTED] at ALLIANCE GROUND INTERNATIONAL for a subtotal of \$25,000.26. The subtotal represented money that would be split between IRFAN SYED, [REDACTED], and the DELTA EMPLOYEE.
26. On or about January 5, 2022, IRFAN SYED, through JET WAY, sent an invoice to [REDACTED] at ALLIANCE GROUND INTERNATIONAL for a subtotal of \$25,000.26. The subtotal represented money that would be split between IRFAN SYED, [REDACTED], and the DELTA EMPLOYEE.
27. On or about April 6, 2022, IRFAN SYED, through JET WAY, sent an invoice to [REDACTED] at ALLIANCE GROUND INTERNATIONAL for a subtotal of \$25,000.26. The subtotal represented money that would be split between IRFAN SYED, [REDACTED], and the DELTA EMPLOYEE.
28. On or about July 6, 2022, IRFAN SYED, through JET WAY, sent an invoice to [REDACTED] at ALLIANCE GROUND INTERNATIONAL for a subtotal of \$25,000.26. The subtotal represented money that would be split between IRFAN SYED, [REDACTED], and the DELTA EMPLOYEE.
29. On or about October 12, 2022, IRFAN SYED, through JET WAY, sent an invoice to [REDACTED] at ALLIANCE GROUND INTERNATIONAL for a subtotal of \$25,000.07. The subtotal represented money that would be split between IRFAN SYED, [REDACTED], and the DELTA EMPLOYEE.
30. On or about January 4, 2023, IRFAN SYED, through JET WAY, sent an invoice to [REDACTED] at ALLIANCE GROUND INTERNATIONAL for a subtotal of \$25,000.07. The subtotal represented money that would be split between IRFAN SYED, [REDACTED], and the DELTA EMPLOYEE.
31. On or about and in between January 3, 2018 and October 12, 2022, BEAU BAER would hand deliver one-third of the subtotal of the above-referenced invoices to the DELTA

EMPLOYEE at the DELTA EMPLOYEE's office located at JFK Airport, Queens, New York.

32. On or about and in between January 3, 2018 and October 12, 2022, [REDACTED], IFRAN SYED, and BEAU BAER took the DELTA EMPLOYEE on quarterly trips to Las Vegas, Nevada where the DELTA EMPLOYEE received complementary services and other benefits of monetary value.
33. On or about and in between January 3, 2018 and October 12, 2022, [REDACTED], IFRAN SYED, and BEAU BAER would take the DELTA EMPLOYEE on yearly trips to Atlantic City, New Jersey where the DELTA EMPLOYEE would receive comped meals and other benefits of monetary value.
34. On or about August 7, 2023, IRFAN SYED handed the DELTA EMPLOYEE six envelopes each containing \$10,000 in United States currency, for a total of \$60,000, at the JET WAY offices in Nassau County, New York. The \$60,000 represented bribe money to the DELTA EMPLOYEE for the continued maintenance of JET WAY and ALLIANCE GROUND INTERNATIONAL's contracts with DELTA AIRLINES.

COUNT THREE

AND THE AFORESAID GRAND JURY, by this Indictment, further accuses the defendants, IRFAN SYED, [REDACTED], and BEAU BAER of the crime of MONEY LAUNDERING IN THE SECOND DEGREE in violation of §470.15(1)(b)(ii)(A)(iii) of the Penal Law of the State of New York, committed as follows:

Said defendants, on or about and in between January 3, 2018 and August 7, 2023, in the County of Queens, State of New York and elsewhere in the State of New York, while each acting in concert and aiding the other, knowing that the property involved in one or more financial transactions represented the proceeds of specified criminal conduct, conducted one or more financial transactions involving property represented to be the proceeds of that specified criminal conduct, specifically, cash payments made to an individual known to this Grand Jury employed at DELTA AIRLINES (the "DELTA EMPLOYEE"), and knowing that the transaction or

transactions were in whole or in part designed to conceal or disguise the nature, the location, the source, the ownership or the control of property believed to be the proceeds of the aforementioned criminal conduct and that the total represented value of such property involved in such financial transactions exceeded one hundred thousand dollars.

COUNT FOUR

AND THE AFORESAID GRAND JURY, by this Indictment, accuses the defendants, IRFAN SYED, [REDACTED], and BEAU BAER, of the crime of SCHEME TO DEFRAUD IN THE FIRST DEGREE in violation of §190.65(1)(b) of the Penal Law of the State of New York, committed as follows:

Said defendants, on or about and in between January 3, 2018 and August 7, 2023, in the County of Queens, State of New York, while acting in concert and aiding one another, engaged in a scheme constituting a systemic ongoing course of conduct with the intent to defraud more than one person or to obtain property from more than one person by false or fraudulent pretenses, representations or promises, and so obtained property from one or more of such persons with a value in excess of one thousand dollars.

COUNT FIVE

AND THE AFORESAID GRAND JURY, by this Indictment, further accuses the defendants, IRFAN SYED, [REDACTED], and BEAU BAER, of the crime of COMMERCIAL BRIBING THE SECOND DEGREE in violation of §180.00 of the Penal Law of the State of New York, committed as follows:

Said defendants, on or about and in between January 3, 2018 and August 7, 2023, in the County of Queens, State of New York, while acting in concert and aiding one another, conferred, or offered or agreed to confer, any benefit, specifically a sum of United States currency, upon any employee, agent or fiduciary, namely an individual known to this Grand Jury employed by DELTA AIRLINES (the “DELTA EMPLOYEE”), without the consent of the latter’s employer or principal, with the intent to influence said employee, agent, or fiduciary’s conduct in relation to their employer or principal’s affairs.

COUNT SIX

AND THE AFORESAID GRAND JURY, by this Indictment, further accuses the defendants, IRFAN SYED and [REDACTED], of the crime of FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE in violation of §175.10 of the Penal Law of the State of New York, committed as follows:

Said defendants, on or about January 6, 2021, in the County of Queens, State of New York, while acting in concert and aiding one another, with the intent to defraud, made or caused a false entry in the business records of an enterprise, namely JET WAY, and the defendants intent to defraud included an intent to commit another crime or to aid or conceal the commission thereof.

COUNT SEVEN

AND THE AFORESAID GRAND JURY, by this Indictment, further accuses the defendants, IRFAN SYED and [REDACTED], of the crime of FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE in violation of §175.10 of the Penal Law of the State of New York, committed as follows:

Said defendants, on or about April 7, 2021, in the County of Queens, State of New York, while acting in concert and aiding one another, with the intent to defraud, made or caused a false entry in the business records of an enterprise, namely JET WAY, and the defendants intent to defraud included an intent to commit another crime or to aid or conceal the commission thereof.

COUNT EIGHT

AND THE AFORESAID GRAND JURY, by this Indictment, further accuses the defendants, IRFAN SYED and [REDACTED], of the crime of FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE in violation of §175.10 of the Penal Law of the State of New York, committed as follows:

Said defendants, on or about July 7, 2021, in the County of Queens, State of New York, while acting in concert and aiding one another, with the intent to defraud, made or caused a false entry in the business records of an enterprise, namely JET WAY, and the defendants intent to defraud included an intent to commit another crime or to aid or conceal the commission thereof.

COUNT NINE

AND THE AFORESAID GRAND JURY, by this Indictment, further accuses the defendants, IRFAN SYED and [REDACTED], of the crime of FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE in violation of §175.10 of the Penal Law of the State of New York, committed as follows:

Said defendants, on or about October 6, 2021, in the County of Queens, State of New York, while acting in concert and aiding one another, with the intent to defraud, made or caused a false

entry in the business records of an enterprise, namely JET WAY, and the defendants intent to defraud included an intent to commit another crime or to aid or conceal the commission thereof.

COUNT TEN

AND THE AFORESAID GRAND JURY, by this Indictment, further accuses the defendants, IRFAN SYED and [REDACTED], of the crime of FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE in violation of §175.10 of the Penal Law of the State of New York, committed as follows:

Said defendants, on or about January 5, 2022, in the County of Queens, State of New York, while acting in concert and aiding one another, with the intent to defraud, made or caused a false entry in the business records of an enterprise, namely JET WAY, and the defendants intent to defraud included an intent to commit another crime or to aid or conceal the commission thereof.

COUNT ELEVEN

AND THE AFORESAID GRAND JURY, by this Indictment, further accuses the defendants, IRFAN SYED and [REDACTED], of the crime of FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE in violation of §175.10 of the Penal Law of the State of New York, committed as follows:

Said defendants, on or about April 6, 2022, in the County of Queens, State of New York, while acting in concert and aiding one another, with the intent to defraud, made or caused a false entry in the business records of an enterprise, namely JET WAY, and the defendants intent to defraud included an intent to commit another crime or to aid or conceal the commission thereof.

COUNT TWELVE

AND THE AFORESAID GRAND JURY, by this Indictment, further accuses the defendants, IRFAN SYED and [REDACTED], of the crime of FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE in violation of §175.10 of the Penal Law of the State of New York, committed as follows:

Said defendants, on or about July 6, 2022, in the County of Queens, State of New York, while acting in concert and aiding one another, with the intent to defraud, made or caused a false entry in the business records of an enterprise, namely JET WAY, and the defendants intent to defraud included an intent to commit another crime or to aid or conceal the commission thereof.

COUNT THIRTEEN

AND THE AFORESAID GRAND JURY, by this Indictment, further accuses the defendants, IRFAN SYED and [REDACTED], of the crime of FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE in violation of §175.10 of the Penal Law of the State of New York, committed as follows:

Said defendants, on or about October 12, 2022, in the County of Queens, State of New York, while acting in concert and aiding one another, with the intent to defraud, made or caused a false entry in the business records of an enterprise, namely JET WAY, and the defendants intent to defraud included an intent to commit another crime or to aid or conceal the commission thereof..

COUNT FOURTEEN

AND THE AFORESAID GRAND JURY, by this Indictment, further accuses the defendants, IRFAN SYED and [REDACTED], of the crime of FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE in violation of §175.10 of the Penal Law of the State of New York, committed as follows:

Said defendants, on or about January 4, 2023, in the County of Queens, State of New York, while acting in concert and aiding one another, with the intent to defraud, made or caused a false entry in the business records of an enterprise, namely JET WAY, and the defendants intent to defraud included an intent to commit another crime or to aid or conceal the commission thereof.

LETITIA JAMES
ATTORNEY GENERAL
STATE OF NEW YORK

BY: _____
NICHOLAS KYRIACOU
ASSISTANT ATTORNEY GENERAL