



UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NORTH CAROLINA  
CHARLOTTE DIVISION

FILED  
IN COURT  
CHARLOTTE, N. C.  
MAR 28 2001  
U. S. DISTRICT COURT  
W. DIST. OF N. C.

UNITED STATES OF AMERICA )

DOCKET NO. 3:00CR147-MU

v. )

**SUPERSEDING**

**BILL OF INDICTMENT**

1. MOHAMAD YOUSSEF HAMMOUD )

a/k/a Ali A. A. Abousaleh )

a/k/a Ali A. A. Albousaleh )

2. BASSAM YOUSSEF HAMMOOD )

a/k/a Bassem Hammoud )

a/k/a Bassam Hammoud )

3. CHAWKI YOUSSEF HAMMOUD )

a/k/a Ali Darwiche Hussein )

4. MOHAMAD ATEF DARWICHE )

a/k/a Mohamad Darwich )

5. ALI HUSSEIN DARWICHE )

a/k/a Ali Hussein Darwich )

6. ALI FAYEZ DARWICHE )

a/k/a Ali Darwich )

a/k/a Ali Darwich )

7. SAID MOHAMAD HARB )

a/k/a Mustapha Harb )

a/k/a Ahmed Al Alqam )

a/k/a Ahmed Am )

a/k/a Mohamad Dbouk )

8. ANGELA GEORGIA TSIOUMAS )

a/k/a Angie Tsioumas )

9. MEHDI HACHEM MOUSSAOUI )

a/k/a Mehdi Moussoui )

a/k/a Mehdi Masawi )

15. JESSICA YOLANDA FORTUNE )

16. MARIE LUCIE CADET )

17. MARY DENISE COVINGTON )

19. HUSSEIN CHAHROUR )

a/k/a Hussein R. Chahrour )

a/k/a Hussein R. Chahriour )

a/k/a Samuel R. Chahour )

a/k/a Sam Chahrour )

Violation(s): 8 U.S.C. § 1324(a)(1)(A)(v)(I)

8 U.S.C. § 1325(c)

18 U.S.C. § 2

18 U.S.C. § 201(b)(1)

18 U.S.C. § 215

18 U.S.C. § 371

18 U.S.C. § 982

18 U.S.C. § 1029

18 U.S.C. § 1341

18 U.S.C. § 1344

18 U.S.C. § 1546(a)

18 U.S.C. § 1956(a) and (b)

18 U.S.C. § 1962(d)

18 U.S.C. § 2314

18 U.S.C. § 2339B

18 U.S.C. § 2342

20. MOHIT BEHL )  
a/k/a Mee Yin Foo )  
a/k/a Rohit Behl )  
a/k/a Navid Katel )  
21. NABIL E. ISMAIL )  
a/k/a Nabil Ishmail )  
a/k/a Nabil Ismael )  
a/k/a Nabil Labed Ismail )  
22. ALI ADHAM AMHAZ )  
a/k/a Ali Amhaz )  
23. MOHAMAD HASSAN DBOUK )  
a/k/a Haj Mohamad Hassan Dbouk )  
a/k/a Mohamad Dbouk )  
a/k/a Mohamad Dabouk )  
a/k/a Mohamad Dabook )  
a/k/a Hohamad Hassan Dbouk )  
24. HASSAN HILU LAQIS )  
a/k/a Haj Hassan Hllu Laquis )  
a/k/a Hassan Lakkis )  
a/k/a Hassan Laquis )  
a/k/a Hussein Hassan )  
a/k/a Hassan HusseinLaquis )  
a/k/a Hassan Al-Lakkis )
- 

**THE GRAND JURY CHARGES:**

**COUNT ONE**

On or about September 12, 1997, at Detroit, State of Michigan, within the United States of America,

**MOHAMAD YOUSSEF HAMMOUD**

a/k/a Ali A. A. Abousaleh  
a/k/a Ali A. A. Albousaleh

a native and citizen of Lebanon, having been denied an immigration visa by the Immigration and Naturalization Service and granted until September 6, 1996 to depart voluntarily from the United States, did knowingly enter into a marriage with Angela Georgia Tsiournas, a United States citizen, for the purpose of evading a provision of the immigration laws, that is, to adjust his immigration status to a Lawful Permanent Resident based on the immediate relative status conferred by Title 8, United States Code, Section 1151(b)(2)(A)(i), as an alien married to a citizen of the United States.

In violation of Title 8, United States Code, Section 1325(c).

**COUNT TWO**

On or about July 5, 2000, at Charlotte, in Mecklenburg County, North Carolina, within the Western District of North Carolina,

**MOHAMAD YOUSSEF HAMMOUD**

a/k/a Ali A. A. Abousaleh

a/k/a Ali A. A. Albousaleh

a native and citizen of Lebanon, did knowingly present to the Immigration and Naturalization Service a Petition to Remove the Conditions on Residence (INS Form I-751), which Petition contained a statement or statements MOHAMAD YOUSSEF HAMMOUD, a/k/a Ali A. A. Abousaleh, a/k/a Ali A. A. Albousaleh, then and there knew were false, to wit, that he had not used a name other than Mohamad Hammoud, that he had not committed any crime and that his marriage to Angela Georgia Tsioumas was in accordance with the laws of the place of the marriage, and that said Petition was submitted to secure for himself unconditional lawful permanent residence status in the United States of America.

In violation of Title 18, United States Code, Section 1546(a).

**COUNT THREE**

On or about September 12, 1997, at Detroit, State of Michigan, within the United States of America,

**ANGELA GEORGIA TSIOUMAS**

a/k/a Angle Tsioumas

a United States citizen, did knowingly enter into a marriage with Mohamad Youssef Hammond, a/k/a Ali A. A. Abousaleh, a/k/a Ali A. A. Albousaleh, for the purpose of evading a provision of the immigration laws, that is, to assist Mohamad Youssef Hammond, a/k/a Ali A. A. Abousaleh, a/k/a Ali A. A. Albousaleh, a native and citizen of Lebanon, in adjusting his immigration status to a Lawful Permanent Resident based on the immediate relative status conferred by Title 8, United States Code, Section 1151(b)(2)(A)(i), as an alien married to a citizen of the United States.

In violation of Title 8, United States Code, Section 1325(c).

**COUNT FOUR**

On or about July 5, 2000, at Charlotte, in Mecklenburg County, North Carolina, within the Western District of North Carolina,

**ANGELA GEORGIA TSIUMAS**  
a/k/a Angie Tsioumas

a United States citizen, did knowingly present to the Immigration and Naturalization Service a Petition to Remove the Condition on Residence (INS Form I-751) on behalf of Mohamad Youssef Hammoud, a/k/a Ali A. A. Abousaleh, a/k/a Ali A. A. Albousaleh, a native and citizen of Lebanon, which petition contained a statement ANGELA GEORGIA TSIUMAS, a/k/a Angie Tsioumas, then and there knew was false, to wit, that her marriage to Mohammad Youssef Hammoud, a/k/a Ali A. A. Abousaleh, a/k/a Ali A. A. Albousaleh, was in accordance with the laws of the place of the marriage and that said Petition was submitted to secure for Mohamad Youssef Hammoud, a/k/a Ali A. A. Abousaleh, a/k/a Ali A. A. Albousaleh, unconditional Lawful Permanent Resident status in the United States.

In violation of Title 18, United States Code, Section 1546(a).

**COUNT FIVE**

Beginning on or about July 12, 1994 and continuing until the present, at Charlotte, in Mecklenburg County, North Carolina, within the Western District of North Carolina, and elsewhere,

**CHAWKI YOUSSEF HAMMOUD**  
a/k/a Ali Darwiche Hussein  
**JESSICA YOLANDA FORTUNE**

did unlawfully, willfully, knowingly and intentionally combine, conspire, confederate and agree with one another to defraud the United States in the administration of its immigration and naturalization laws by knowingly entering into a marriage for the purpose of evading a provision of the immigration laws, that is, to adjust Chawki Youssef Hammoud's immigration status to a Lawful Permanent Resident based on the immediate relative status conferred by Title 8, United States Code, Section 1151(b)(2)(A)(i), as an alien married to a citizen of the United States, in violation of Title 8, United States Code, Section 1325(c) and 1329, and Title 18, United States Code, Section 1546(a), and in furtherance thereof, did commit within the Western District of North Carolina, and elsewhere, the following overt acts.

1. Chawki Youssef Hammoud, a native and citizen of Lebanon, entered the United States on August 16, 1990 at JFK International Airport, New York City, NY. Chawki

Hammoud then presented a Lebanese passport bearing an Exchange Visitor (J-1) U.S. NIV issued at Damascus, Syria. Chawki Hammoud was admitted until January 30, 1991.

2. On July 12, 1994, Chawki Youssef Hammoud married Jessica Yolanda Fortune in Lancaster, SC. On or about January 6, 1995, Jessica Yolanda Fortune filed a Petition for Alien Relative (INS Form I-130) at Charlotte, NC. On or about January, 6 1995, Chawki Youssef Hammoud filed an Application to Register Permanent Residence or Adjust Status (INS Form I-485) at Charlotte, NC.
3. On or about May 1, 1995, Chawki Youssef Hammoud and Jessica Yolanda Fortune were interviewed under oath by an INS Examiner at Charlotte, NC relative to their marriage. On May 1, 1995, Chawki Youssef Hammoud was granted Conditional Lawful Permanent Resident (LPR) status (CR-6) at Charlotte, NC. On June 6, 1997, Chawki Youssef Hammoud had his status adjusted to that of Lawful Permanent Resident (LPR) (IR-6) of the United States.
4. Chawki Youssef Hammoud and Jessica Yolanda Fortune do not reside together. Chawki Youssef Hammoud resides at 4412 Brittmore Court, Charlotte, NC with Dalida Darwiche. Jessica Yolanda Fortune resides at 124 S. Cecil Street, Lexington, NC. Nonetheless, Chawki Youssef Hammoud and Jessica Yolanda Fortune have continued to represent themselves to the INS as husband and wife.

All in violation of Title 18, United States Code, Section 371.

**COUNT SIX**

On or about March 14, 1996, at Charlotte, in Mecklenburg County, North Carolina, within the Western District of North Carolina,

**MOHAMAD ATEF DARWICHE**  
**a/k/a Mohamad Darwich**

a native and citizen of Lebanon, having entered the United States of America on or about June 6, 1992, did knowingly enter into a marriage with Mary Denise Covington, a United States citizen, for the purpose of evading a provision of the immigration laws, that is, to adjust his immigration status to a Lawful Permanent Resident based on the immediate relative status conferred by Title 8, United States Code, Section 1151(b)(2)(A)(i), as an alien married to a citizen of the United States.

In violation of Title 8, United States Code, Section 1325(c).

**COUNT SEVEN**

On or about September 26, 1997, at Charlotte, in Mecklenburg County, North Carolina, within the Western District of North Carolina,

**MOHAMAD ATEF DARWICHE**  
a/k/a Mohamad Darwich

a native and citizen of Lebanon, did knowingly present to the Immigration and Naturalization Service an Application to Register Permanent Residence or Adjust Status (INS Form I-485) which contained a statement MOHAMAD ATEF DARWICHE, a/k/a Mohamad Darwich, then and there knew was false, to wit, MOHAMAD ATEF DARWICHE, a/k/a Mohamad Darwich, represented to the Immigration and Naturalization Service that he was married to Mary Denise Covington, a United States citizen, knowing that his marriage to Mary Denise Covington was a sham, false and fraudulent marriage entered into for the purpose of enabling MOHAMAD ATEF DARWICHE, a/k/a Mohamad Darwich, to secure permanent resident alien status in the United States.

In violation of Title 18, United States Code, Section 1546(a).

**COUNT EIGHT**

On or about March 14, 1996, at Charlotte, in Mecklenburg County, North Carolina, within the Western District of North Carolina,

**MARY DENISE COVINGTON**

a United States citizen, did knowingly enter into a marriage with Mohamad Atef Darwiche, a/k/a Mohamad Darwich, for the purpose of evading a provision of the immigration laws, that is, to assist Mohamad Atef Darwiche, a/k/a Mohamad Darwich, a native and citizen of Lebanon, in adjusting his immigration status to a Lawful Permanent Resident based on the immediate relative status conferred by Title 8, United States Code, Section 1151(b)(2)(A)(i), as an alien married to a citizen of the United States.

In violation of Title 8, United States Code, Section 1325(c).

**COUNT NINE**

On or about September 26, 1997, at Charlotte, in Mecklenburg County, North Carolina, within the Western District of North Carolina,

**MARY DENISE COVINGTON**

a United States citizen, did knowingly present to the Immigration and Naturalization Service a Petition for Alien Relative (INS Form I-130) on behalf of Mohamad Atef Darwiche, a/k/a Mohamad Darwich, a native and citizen of Lebanon, which petition contained a statement MARY DENISE COVINGTON then and there knew was false, to wit, MARY DENISE COVINGTON, represented to the Immigration and Naturalization Service that she was married to Mohamad Atef Darwiche, a/k/a Mohamad Darwich, knowing that her marriage to Mohamad Atef Darwiche, a/k/a Mohamad Darwich, was a sham, false and fraudulent marriage entered into for the purpose of enabling Mohamad Atef Darwiche, a/k/a Mohamad Darwich, to secure a Lawful Permanent Resident visa in the United States.

In violation of Title 18, United States Code, Section 1546(a).

**COUNT TEN**

On or about November 9, 1999, at Charlotte, in Mecklenburg County, North Carolina, within the Western District of North Carolina,

**ALI HUSSEIN DARWICHE**  
**a/k/a Ali Hussein Darwich**

a native and citizen of Lebanon, having entered the United States of America on or about November 18, 1991, and having been paroled into the United States on or about February 4, 1996, did knowingly enter into a marriage with Melanie Lynne Haynes, a United States citizen, for the purpose of evading a provision of the immigration laws, that is, to adjust his immigration status to a Lawful Permanent Resident based on the immediate relative status conferred by Title 8, United States Code, Section 1151(b)(2)(A)(i), as an alien married to a citizen of the United States.

In violation of Title 8, United States Code, Section 1325(c).

Superseding Bill of Indictment  
*USA v. Mohamad Youssef Hammoud, et al*  
3:00CR147-Mu  
Page 8 of 56

**COUNT ELEVEN**

On or about May 31, 1996, at Charlotte, in Mecklenburg County, North Carolina, within the Western District of North Carolina,

**ALI FAYEZ DARWICHE**  
a/k/a Ali Darwich  
a/k/a Ali Darwich

a native and citizen of Lebanon, having entered the United States on June 6, 1992, did knowingly enter into a marriage with Marie Lucie Cadet, a naturalized United States citizen, for the purpose of evading a provision of the immigration laws, that is, to adjust his immigration status to a Lawful Permanent Resident based on the immediate relative status conferred by Title 8, United States Code, Section 1151(b)(2)(A)(i), as an alien married to a citizen of the United States.

In violation of Title 8, United States Code, Section 1325(c).

**COUNT TWELVE**

On or about March 25, 1999, at Charlotte, in Mecklenburg County, North Carolina, within the Western District of North Carolina,

**ALI FAYEZ DARWICHE**  
a/k/a Ali Darwich  
a/k/a Ali Darwich

a native and citizen of Lebanon, did knowingly present to the Immigration and Naturalization Service an Application to Register Permanent Residence or Adjust Status (INS Form I-485) which contained a statement which ALI FAYEZ DARWICHE, a/k/a Ali Darwich, a/k/a Ali Darwich, then and there knew was false, to wit, ALI FAYEZ DARWICHE, a/k/a Ali Darwich, a/k/a Ali Darwich, represented to the Immigration and Naturalization Service that he was married to Marie Lucie Cadet, a United States citizen, knowing that his marriage to Marie Lucie Cadet was a sham, false and fraudulent marriage entered into for the purpose of enabling ALI FAYEZ DARWICHE, a/k/a Ali Darwich, a/k/a Ali Darwich, to secure a Lawful Permanent Resident visa in the United States.

In violation of Title 18, United States Code, Section 1546(a).

**COUNT THIRTEEN**

On or about May 31, 1996, at Charlotte, in Mecklenburg County, North Carolina, within the Western District of North Carolina,

**MARIE LUCIE CADET**

a naturalized United States citizen, did knowingly enter into a marriage with Ali Fayeze Darwiche, a/k/a Ali Darwich, a/k/a Ali Darwieh, for the purpose of evading a provision of the immigration laws, that is, to assist Ali Fayeze Darwiche, a/k/a Ali Darwich, a/k/a Ali Darwieh, a native and citizen of Lebanon, in adjusting his immigration status to a Lawful Permanent Resident based on the immediate relative status conferred by Title 8, United States Code, Section 1151(b)(2)(A)(i), as an alien married to a citizen of the United States

In violation of Title 8, United States Code, Section 1325(c).

**COUNT FOURTEEN**

On or about June 12, 1996, at Charlotte, in Mecklenburg County, North Carolina, within the Western District of North Carolina,

**MARIE LUCIE CADET**

a naturalized United States citizen, did knowingly present to the Immigration and Naturalization Service a Petition for Alien Relative (INS Form I-130) on behalf of Ali Fayeze Darwiche, a/k/a Ali Darwich, a/k/a Ali Darwieh, a native and citizen of Lebanon, which petition contained a statement MARIE LUCIE CADET then and there knew was false, to wit, MARIE LUCIE CADET, represented to the Immigration and Naturalization Service that she was married to Ali Fayeze Darwiche, a/k/a Ali Darwich, a/k/a Ali Darwieh, knowing that her marriage to Ali Fayeze Darwiche, a/k/a Ali Darwich, a/k/a Ali Darwieh, was a sham, false and fraudulent marriage entered into for the purpose of enabling Ali Fayeze Darwiche, a/k/a Ali Darwich, a/k/a Ali Darwieh, to secure a Lawful Permanent Resident visa in the United States.

In violation of Title 18, United States Code, Section 1546(a).

**COUNT THIRTY-THREE**

Beginning on or about January 4, 1999 and continuing until on or about January 27, 2000, within the Western District of North Carolina and elsewhere,

**SAID MOHAMAD HARB**  
a/k/a Mustapha Harb  
a/k/a Ahmed Al Alqam  
a/k/a Ahmed Am  
a/k/a Mohamad Dbouk

did unlawfully, willfully, knowingly and intentionally combine, conspire, confederate and agree with others known and unknown to the Grand Jury (1) to defraud the United States in the administration of its immigration and naturalization laws by assisting aliens to secure non-immigrant visas to the United States by means of false statements, and by arranging fraudulent marriages between Lebanese aliens and United States citizens with intent to procure immigrant visas and permanent United States residency status for said aliens by means of false statements to the Immigration and Naturalization Service and to consular officials of the United States Embassy in Nicosia, Cyprus; (2) and to encourage and induce an alien to come to, enter and reside in the United States knowing that such coming to, entry and residence was in violation of law, in violation of Title 8, United States Code, Sections 1325(c) and 1324(a)(1)(A)(iv) and Title 18, United States Code, Section 1546(a).

In furtherance of the conspiracy and to effect the object thereof the following overt acts were committed within the Western District of North Carolina and elsewhere:

1. On or about January 5, 1999, SAID MOHAMAD HARB, a/k/a Mustapha Harb, a/k/a Ahmed Al Alqam, a/k/a Ahmed Am, a/k/a Mohamad Dbouk, assisted Haissam Mohamad Harb, his brother and a native and citizen of Lebanon, in securing a U.S. Non-Immigrant Visa issued at Nicosia, Cyprus, for an alleged one-week business trip to Quilt Crafters located in Rochester, New York.
2. On or about January 11, 1999, Haissam Mohamad Harb entered the United States at Chicago, Illinois, and presented a Lebanese passport bearing a Visitor (B-2) U.S. Non-Immigrant Visa issued at Nicosia, Cyprus, on January 5, 1999.
3. On or about March 8, 1999, SAID MOHAMAD HARB, a/k/a Mustapha Harb, a/k/a Ahmed Al Alqam, a/k/a Ahmed Am, a/k/a Mohamad Dbouk, paid a sum of money to Tonia Yvonne Moore to marry his brother, Haissam Mohamad Harb, a native and citizen of Lebanon, for the purpose of obtaining a Lawful Permanent Resident status in the United States. Haissam Mohamad Harb married Tonia Yvonne Moore on or about March 8, 1999, in Charlotte, North Carolina.

4. On or about January 4, 1999, SAID MOHAMAD HARB, a/k/a Mustapha Harb, a/k/a Ahmed Al Alqam, a/k/a Ahmed Am, a/k/a Mohamad Dbouk, assisted Samir Mohamad Ali Debk, his brother-in-law and a native and citizen of Lebanon, in securing a U.S. Non-Immigrant Visa issued at Nicosia, Cyprus, for an alleged ten-day business trip to Cotton/Feather Company located in Stamford, Connecticut.
5. On or about January 11, 1999, Samir Mohamad Ali Debk entered the United States at Chicago, Illinois, and presented a Lebanese passport bearing a Visitor (B-2) U.S. Non-Immigrant Visa issued at Nicosia, Cyprus, on January 4, 1999.
6. On or about April 6, 1999, SAID MOHAMAD HARB, a/k/a Mustapha Harb, a/k/a Ahmed Al Alqam, a/k/a Ahmed Am, a/k/a Mohamad Dbouk, paid a sum of money to Terri Jeanne Pish to marry his brother-in-law, Samir Mohamad Ali Debk, a native and citizen of Lebanon, for the purpose of obtaining a Lawful Permanent Resident status in the United States. Samir Mohamad Ali Debk married Terry Jeanne Pish on April 6, 1999, in Charlotte, North Carolina.
7. On an uncertain date prior to October 5, 1999, SAID MOHAMAD HARB, a/k/a Mustapha Harb, a/k/a Ahmed Al Alqam, a/k/a Ahmed Am, a/k/a Mohamad Dbouk, traveled to Lebanon and Cyprus with Wayne Jeffrey Swaringen, a United States citizen, to arrange a fraudulent marriage between SAID MOHAMAD HARB'S sister, Fatme Mohamad Harb, a native and citizen of Lebanon, and Wayne Jeffrey Swaringen in order for Fatme Mohamad Harb to obtain an immigrant visa to the United States.
8. On or about October 5, 1999, SAID MOHAMAD HARB, a/k/a Mustapha Harb, a/k/a Ahmed Al Alqam, a/k/a Ahmed Am, a/k/a Mohamad Dbouk, paid Wayne Jeffrey Swaringen to marry Fatme Mohamad Harb. Wayne Jeffrey Swaringen married Fatme Mohamad Harb on or about October 5, 1999 in Larnaca, Cyprus.
9. On or about January 27, 2000, Fatme Mohamad Harb entered the United States at Atlanta, Georgia and presented a Lebanese passport and a U.S. Immigrant Visa (CR-10) issued at Nicosia, Cyprus, on January 21, 2000.

All in violation of Title 18, United States Code, Section 371 and Title 8, United States Code, Section 1324(a)(1)(A)(v)(I).

**COUNT THIRTY-FOUR**

From on or about June 20, 2000, up to and including July 8, 2000, in Charlotte, North Carolina within the Western District of North Carolina,

**SAID MOHAMAD HARB**  
a/k/a Mustapha Harb  
a/k/a Ahmed Al Alqam  
a/k/a Ahmed Am  
a/k/a Mohamad Dbouk

directly and indirectly, did corruptly give, offer and promise something of value, that is, \$10,000, to a public official, that is, a Special Agent of the Immigration and Naturalization Service, with the intent to influence an official act, that is, the entry of his brother, Haissam Mohamad Harb a/k/a Mohamad Dbouk, into the United States via "advance parole."

In violation of Title 18, United States Code, Section 201(b)(1).

**COUNT THIRTY-FIVE**

**INTRODUCTORY PARAGRAPHS**

1. Cigarettes which are sold by wholesalers are typically sold by the half case (30 cartons). The wholesaler or distributor of the cigarettes cuts the cases in half prior to selling to the general public. Pursuant to Federal law, any person who sells more than 60,000 individual cigarettes (300 cartons) in a single transaction must adhere to reporting and record keeping requirements.
2. Pursuant to Federal law, a quantity of cigarettes in excess of 60,000 which bears no evidence of payment of applicable cigarette taxes in the State where such cigarettes are found are contraband.
3. As of January 1, 1994, the State of North Carolina amended the Tobacco Procedure Tax Law to replace the tax paid indicia method with a reporting method. Therefore, cigarettes are not stamped per pack or by the case to indicate payment of State tax. In North Carolina, cigarette distributors are required to place a statement on invoices showing that tax has been paid and businesses buying from the distributor are required to have that statement.
4. At all times relevant to this indictment, cigarettes transported to and into Michigan were required to bear evidence of tax payment.

5. As of May 1, 1994, the State of Michigan raised its cigarette tax from \$2.50 per carton to \$7.50 per carton (from 25 cents per pack to 75 cents per pack). During all times relevant to this indictment, the State of Michigan did not have a stamping requirement for each individual pack of cigarettes to indicate payment of the state tax. However, Michigan's wholesalers were required to stamp the half cases (30 cartons) of cigarettes at the time of purchase.
6. At all times relevant to this indictment, cigarettes in North Carolina were taxed at 50 cents per carton (5 cents per pack). Therefore, individuals who transport cigarettes from North Carolina to Michigan for resale profit \$7.00 per carton (70 cents per pack) causing Michigan to lose this amount of excise tax per carton.
7. The result of North Carolina not having a stamping requirement and Michigan only requiring a stamp on the half case of cigarettes made it extremely profitable to smuggle cigarettes into Michigan from North Carolina and avoid payment of the state tax in Michigan.
8. At no time relevant to this indictment was any defendant a licensed unclassified acquirer, distributor, or wholesaler of tobacco products in the State of Michigan.
9. At no time relevant to this indictment has any defendant been a licensed cigarette distributor in the State of North Carolina.

From in or about March 1996, continuing to in or about July 2000, within the Western District of North Carolina, and elsewhere,

**MOHAMAD YOUSSEF HAMMOUD**

a/k/a Ali A. A. Abousaleh

a/k/a Ali A. A. Albousaleh

**BASSAM YOUSSEF HAMMOUD**

a/k/a Bassam Hammoud

a/k/a Bassam Hammoud

**CHAWKI YOUSSEF HAMMOUD**

a/k/a Ali Darwiche Hussein

**MOHAMAD ATEF DARWICHE**

a/k/a Mohamad Darwich

**ALI HUSSEIN DARWICHE**

a/k/a Ali Hussein Darwich

**ALI FAYEZ DARWICHE**

a/k/a Ali Darwich

a/k/a Ali Darwich

**SAID MOHAMAD HARB**

a/k/a Mustapha Harb  
a/k/a Ahmed Al Alqam  
a/k/a Ahmed Am  
a/k/a Mohamad Dbouk  
ANGELA GEORGIA TSIUMAS  
a/k/a Angie Tsioumas  
MERDI HACHEM MOUSSAOUI  
a/k/a Mehdi Moussoui  
a/k/a Mehdi Masawi  
HUSSEIN CHAHROUR  
a/k/a Hussein R. Chahrour  
a/k/a Hussein R. Chahriour  
a/k/a Samual R. Chahour  
a/k/a Sam Chahrour  
NABIL E. ISMAIL  
a/k/a Nabil Ishmail  
a/k/a Nabil Ismael  
a/k/a Nabil Labed Ismail

combined, conspired, confederated and agreed with each other and others, both known and unknown to the grand jury, to knowingly ship, transport, receive, possess, sell, distribute and purchase contraband cigarettes, in violation of Title 18, U.S.C. § 2342.

**OBJECT OF THE CONSPIRACY**

It was the object of the conspiracy to smuggle contraband cigarettes, as defined by Title 18, U.S.C. § 2341 *et seq.*, from North Carolina to Michigan.

**OVERT ACTS IN FURTHERANCE OF THE CONSPIRACY**

The following overt acts, among others, were committed within the Western District of North Carolina and elsewhere:

1. On or about September 20, 1995, BASSAM YOUSSEF HAMOOD, representing himself as Pierot Sammour, opened an account at JR Tobacco Wholesale using the trade name Sammour. Throughout the conspiracy to traffick in contraband cigarettes, numerous co-conspirators purchased cigarettes from JR Tobacco Wholesale utilizing this account with the intent to transport those cigarettes to Michigan for resale.

2. On or about March 3, 1996, CHAWKI YOUSSEF HAMMOUD was stopped by West Virginia State Police transporting approximately 405 cartons of cigarettes from North Carolina to Michigan for resale.
3. On or about January 24, 1997, three mini-vans were loaded with cigarettes at JR Tobacco Wholesale in Statesville, North Carolina. Those vans, driven by BASSAM HAMMOOD, MEHDI HACHEM MOUSSAOUI and another individual were later stopped by Kentucky Department of Motor Vehicles. A total of approximately 4,464 cartons of cigarettes were seized.
4. On or about January 25, 1997, NABIL E. ISMAIL was traveling through Kentucky at which time he was pulled over by the police. A search of Ismail's vehicle resulted in the discovery of 1,443 cartons of untaxed cigarettes valued at approximately \$30,000. The vehicle was rented from Alamo, Charlotte, North Carolina, on January 3, 1997 by NABIL E. ISMAIL.
5. On or about February 27, 1997, MOHAMAD YOUSSEF HAMMOUD and CHAWKI YOUSSEF HAMMOUD loaded a large quantity of cigarettes into a van at JR Tobacco Wholesale in Statesville, North Carolina. They transported the cigarettes to a mini-warehouse, where they were later loaded into two vehicles. These vehicles, one of which was driven by MOHAMAD YOUSSEF HAMMOUD, were thereafter driven to Michigan and unloaded.
6. On or about April 14, 1997, MOHAMAD YOUSSEF HAMMOUD was stopped by West Virginia State Police and was found to be in possession of \$45,922.
7. On or about May 6, 1997, ALI HUSSEIN DARWICHE was stopped by Campbell County, Tennessee Sheriff's Department transporting approximately 700 cartons of cigarettes from North Carolina to Michigan for resale.
8. On or about May 15, 1997, SAID MOHAMAD HARB and another individual rented a van for the purpose of transporting contraband cigarettes from North Carolina to Michigan for resale. The van was subsequently used to deliver the cigarettes to HUSSEIN CHAHROUR.
9. On or about June 3, 1997, HUSSEIN CHAHROUR wire transferred \$17,000 to MOHAMAD YOUSSEF HAMMOUD as payment for the purchase of contraband cigarettes which were purchased in North Carolina and transported to Michigan.
10. On or about July 7, 1997, a van rented by MOHAMAD ATEF DARWICHE was loaded with a large quantity of cigarettes at JR Tobacco Wholesale in Statesville,

North Carolina. The cigarettes were later reloaded into two mini-vans, which were driven to the homes of ANGELA TSIUMAS and SAID MOHAMAD HARB. The following day SAID MOHAMAD HARB drove one of the mini-vans to Michigan and unloaded the cigarettes at a gas station.

11. On or about August 25, 1997, ANGELA GEORGIA TSIUMAS drove a mini-van from Charlotte, North Carolina to West Virginia. She was stopped by West Virginia State Police and found to be in possession of 1,455 cartons of cigarettes.
12. On or about October 10, 1997, MOHAMAD YOUSSEF HAMMOUD and ANGELA GEORGIA TSIUMAS caused a Penske truck to transport contraband cigarettes from North Carolina to Michigan for resale. The truck was stopped in West Virginia and 4,708 cartons of cigarettes were seized.
13. From in or about December 1997 and continuing to in or about December 1998, ALI FAYEZ DARWICHE provided loans to co-conspirators to finance the purchase of contraband cigarettes.
14. On or about March 24, 1998, at Eastway Tobacco, CHAWKI YOUSSEF HAMMOUD sold 1,080 cartons of cigarettes to an individual he believed was going to transport them to Michigan for resale.
15. On or about August 4, 1998, a van rented by ALI HUSSEIN DARWICHE was loaded with large quantities of cigarettes at Golden Leaf Tobacco in Blacksburg, South Carolina and at JR Tobacco Wholesale in Statesville, North Carolina. The cigarettes were unloaded at a mini-warehouse rented by ALI FAYEZ DARWICHE. The cigarettes were later loaded into another vehicle that was stopped by West Virginia State Police. Inside the vehicle were 809 cartons of cigarettes.
16. On or about September 3, 1998, SAID MOHAMAD HARB caused a load of contraband cigarettes to be transported from North Carolina to Michigan for resale. On that date, \$17,300 representing the proceeds of the sale was seized in West Virginia.
17. On or about March 23, 1999, ANGELA GEORGIA TSIUMAS sold more than \$11,000.00 of cigarettes to an individual she believed would transport them to Michigan for resale.
18. During the course of the conspiracy MOHAMAD YOUSSEF HAMMOUD and SAID MOHAMAD HARB recruited and paid various individuals to drive contraband cigarettes from Charlotte, North Carolina to Michigan for delivery.

19. During the course of the conspiracy MOHAMAD YOUSSEF HAMMOUD, BASSAM YOUSSEF HAMMOOD, CHAWKI YOUSSEF HAMMOUD, ALI HUSSEIN DARWICHE and ALI FAYEZ DARWICHE rented mini-warehouses which were used for the storage of contraband cigarettes.
20. During the course of the conspiracy MOHAMAD YOUSSEF HAMMOUD, BASSAM YOUSSEF HAMMOOD, CHAWKI YOUSSEF HAMMOUD, MOHAMAD ATEF DARWICHE, ALI HUSSEIN DARWICHE, SAID MOHAMAD HARB, ANGELA GEORGIA TSIUMAS, NABIL E. ISMAIL and others made purchases of bulk quantities of cigarettes intended for shipment from North Carolina to Michigan, including but not limited to:

NAME	AMOUNT
MOHAMAD YOUSSEF HAMMOUD	465,751.43
BASSAM YOUSSEF HAMMOOD	351,477.96
CHAWKI YOUSSEF HAMMOUD	754,399.56
MOHAMAD ATEF DARWICHE	32,271.00
ALI HUSSEIN DARWICHE	63,586.70
SAID MOHAMAD HARB	102,644.92
ANGELA GEORGIA TSIUMAS	360,185.81
NABIL E. ISMAIL	49,921.88
CASH - OTHER	6,779,037.26
OTHER	1,930,134.70
<b>TOTALS</b>	<b>10,889,411.22</b>

21. During the course of the conspiracy contraband cigarettes were transported from North Carolina to Michigan by MOHAMAD YOUSSEF HAMMOUD, BASSAM YOUSSEF HAMMOOD, CHAWKI YOUSSEF HAMMOUD, ALI HUSSEIN DARWICHE, MOHAMAD ATEF DARWICHE, MEHDI HACHEM MOUSSAOUI, NABIL E. ISMAIL and others.

22. During the course of the conspiracy, HUSSEIN CHAHROUR paid co-conspirators at least \$198,000 for contraband cigarettes received during the course of numerous deliveries.
23. During the course of the conspiracy the co-conspirators engaged in numerous acts of money laundering and conspiracy to launder money, as alleged in Count 36.

All in violation of Title 18, U.S.C. § 371.

**COUNT THIRTY-SIX**

Beginning in or about March 1996, and continuing through the present time, within the Western District of North Carolina, and elsewhere,

**MOHAMAD YOUSSEF HAMMOUD**

a/k/a Ali A. A. Abousaleh

a/k/a Ali A. A. Albousaleh

**BASSAM YOUSSEF HAMOOD**

a/k/a Bassem Hammoud

a/k/a Bassam Hammoud

**CHAWKI YOUSSEF HAMMOUD**

a/k/a Ali Darwiche Hussein

**MOHAMAD ATEF DARWICHE**

a/k/a Mohamad Darwich

**ALI HUSSEIN DARWICHE**

a/k/a Ali Hussein Darwich

**ALI FAYEZ DARWICHE**

a/k/a Ali Darwich

a/k/a Ali Darwich

**SAID MOHAMAD HARB**

a/k/a Mustapha Harb

a/k/a Ahmed Al Alqam

a/k/a Ahmed Am

a/k/a Mohamad Dbouk

**ANGELA GEORGIA TSIOUMAS**

a/k/a Angie Tsioumas

**MEHDI HACHEM MOUSSAOUI**

a/k/a Mehdi Moussoui

a/k/a Mehdi Masawi

**HUSSEIN CHAHROUR**  
a/k/a Hussein R. Chahrour  
a/k/a Hussein R. Chahriour  
a/k/a Samuel R. Chahour  
a/k/a Sam Chahrour  
**NABIL E. ISMAIL**  
a/k/a Nabil Ishmail  
a/k/a Nabil Ismael  
a/k/a Nabil Labed Ismail

did combine, conspire, confederate and agree with others known and unknown to commit certain offenses against the United States as follows:

- (a) knowing that the property involved in a financial transaction represented the proceeds of some form of unlawful activity, to conduct and attempt to conduct such a financial transaction with the intent to promote the carrying on of specified unlawful activity in violation of 18 U.S.C. § 1956(a)(1)(A)(i); and
- (b) knowing that the property involved in a financial transaction represented the proceeds of some form of unlawful activity, to conduct and attempt to conduct such a financial transaction with intent to engage in conduct constituting a violation of § 7201 or § 7206 of the Internal Revenue Code of 1986 in violation of 18 U.S.C. § 1956(a)(1)(A)(ii); and
- (c) knowing that the property involved in a financial transaction represented the proceeds of some form of unlawful activity, to conduct and attempt to conduct such a financial transaction knowing that the transaction was designed in whole or in part to conceal and disguise the nature, the location, the source, the ownership and the control of the proceeds of specified unlawful activity in violation of 18 U.S.C. § 1956(a)(1)(B)(i); and
- (d) knowing that the property involved in a financial transaction represented the proceeds of some form of unlawful activity, to conduct and attempt to conduct such a financial transaction to avoid a transaction reporting requirement under federal law, in violation of 18 U.S.C. § 1956(a)(1)(B)(ii); and
- (e) knowingly to engage in a monetary transaction in criminally derived property that was of a value greater than \$10,000, in violation of 18 U.S.C. § 1957.

All in violation of Title 18, United States Code, Section 1956(h).

**COUNT THIRTY-SEVEN**

On or about February 27, 1997, within the Western District of North Carolina and elsewhere,

**MOHAMAD YOUSSEF HAMMOUD**  
a/k/a Ali A. A. Abousaleh  
a/k/a Ali A. A. Albousaleh  
**CHAWKI YOUSSEF HAMMOUD**  
a/k/a Ali Darwiche Hussein  
**HUSSEIN CHAHROUR**  
a/k/a Hussein R. Chahrour  
a/k/a Hussein R. Chahriour  
a/k/a Samuel R. Chahour  
a/k/a Sam Chahrour

did knowingly and unlawfully ship, transport, receive, possess, sell and distribute contraband cigarettes, as that term is defined in Title 18, United States Code, Section 2341, to wit, a quantity of more than 60,000 cigarettes which bore no evidence of the payment of applicable state cigarette taxes in the State of Michigan, and did aid and abet one another and others, known and unknown.

All in violation of Title 18, United States Code, Sections 2342 and 2.

**COUNT THIRTY-EIGHT**

On or about May 15, 1997, within the Western District of North Carolina and elsewhere,

**SAID MOHAMAD HARB**  
a/k/a Mustapha Harb  
a/k/a Ahmed Al Alqam  
a/k/a Ahmed Am  
a/k/a Mohamad Dbouk  
**HUSSEIN CHAHROUR**  
a/k/a Hussein R. Chahrour  
a/k/a Hussein R. Chahriour  
a/k/a Samuel R. Chahour  
a/k/a Sam Chahrour

did knowingly and unlawfully ship, transport, receive, possess, sell and distribute contraband cigarettes, as that term is defined in Title 18, United States Code, Section 2341, to wit, a quantity of more than 60,000 cigarettes which bore no evidence of the payment of applicable state cigarette taxes in the State of Michigan, and did aid and abet one another and others known and unknown.

In violation of Title 18, United States Code, Sections 2342 and 2.

**COUNT THIRTY-NINE**

On or about July 7, 1997, within the Western District of North Carolina and elsewhere,

**MOHAMAD ATEF DARWICHE**  
a/k/a Mohamad Darwich  
**SAID MOHAMAD HARB**  
a/k/a Mustapha Harb  
a/k/a Ahmed Al Alqam  
a/k/a Ahmed Am  
a/k/a Mohamad Dbouk  
**ANGELA GEORGIA TSIOUMAS**  
a/k/a Angie Tsoumas  
**HUSSEIN CHAHROUR**  
a/k/a Hussein R. Chahrour  
a/k/a Hussein R. Chahriour  
a/k/a Samuel R. Chahour  
a/k/a Sam Chahrour

did knowingly and unlawfully ship, transport, receive, possess, sell and distribute contraband cigarettes, as that term is defined in Title 18, United States Code, Section 2341, to wit, a quantity of more than 60,000 cigarettes which bore no evidence of the payment of applicable state cigarette taxes in the State of Michigan, and did aid and abet one another and others known and unknown.

In violation of Title 18, United States Code, Sections 2342 and 2.

**COUNT FORTY**

On or about August 25, 1997, within the Western District of North Carolina and elsewhere,

**ANGELA GEORGIA TSIOUMAS**  
a/k/a Angie Tsoumas

did knowingly and unlawfully ship, transport, receive, possess, sell and distribute contraband cigarettes, as that term is defined in Title 18, United States Code, Section 2341, to wit, a quantity of more than 60,000 cigarettes which bore no evidence of the payment of applicable state cigarette taxes in the State of West Virginia and did aid and abet others known and unknown.

In violation of Title 18, United States Code, Sections 2342 and 2.

**COUNT FORTY-ONE**

On or about October 10, 1997, within the Western District of North Carolina and elsewhere,

**MOHAMAD YOUSSEF HAMMOUD**  
a/k/a Ali A. A. Abousaleh  
a/k/a Ali A. A. Albousaleh  
**ANGELA GEORGIA TSIOUMAS**  
a/k/a Angie Tsioumas

did knowingly and unlawfully ship, transport, receive, possess, sell and distribute contraband cigarettes, as that term is defined in Title 18, United States Code, Section 2341, to wit, a quantity of more than 60,000 cigarettes which bore no evidence of the payment of applicable state cigarette taxes in the State of West Virginia, and did aid and abet one another and others, known and unknown.

In violation of Title 18, United States Code, Sections 2342 and 2.

**COUNT FORTY-TWO**

On or about August 4, 1998, within the Western District of North Carolina and elsewhere,

**ALI HUSSEIN DARWICHE**  
a/k/a Ali Hussein Darwich

did knowingly and unlawfully ship, transport, receive, possess, sell and distribute contraband cigarettes, as that term is defined in Title 18, United States Code, Section 2341, to wit, a quantity of more than 60,000 cigarettes which bore no evidence of the payment of applicable state cigarette taxes in the State of West Virginia, and did aid and abet others, known and unknown.

In violation of Title 18, United States Code, Sections 2342 and 2.

**COUNTS FORTY-THREE THROUGH FORTY-NINE**

On or about the following dates, within the Western District of North Carolina and elsewhere, the defendants and others known and unknown to the grand jury, did knowingly and willfully conduct and attempt to conduct the following financial transactions affecting interstate and foreign commerce.

Superseding Bill of Indictment  
*USA v. Mohamad Youssef Hammoud, et al*  
 3:00CR147-Mu  
 Page 23 of 56

1. The defendants knew that property involved in the financial transactions represented the proceeds of some form of unlawful activity.
2. The financial transactions in fact involved the proceeds of specified unlawful activity (that is, proceeds of a conspiracy to smuggle contraband cigarettes in violation of Title 18, United States Code, Section 2342).
3. The defendants intended to promote the carrying on of specified unlawful activity.
4. The defendants and others known and unknown to the grand jury, did aid, abet, command, and induce each other, and willfully cause the commission of said transactions.

Count	Defendant	Date	Transaction
43	Mohamad Youssef Hammoud a/k/a Ali A. A. Abousaleh a/k/a Ali A. A. Albousaleh	08/28/1997	The payment of approximately \$8,000 to JR Tobacco Wholesale
44	Bassam Youssef Hammoud a/k/a Bassem Hammoud a/k/a Bassam Hammoud	04/06/1998	The payment of \$5,387 to Master Card.
45	Chawki Youssef Hammoud a/k/a Ali Darwiche Hussein	08/02/1997	The payment of approximately \$5,093 to Sam's Club.
46	Mohamad Atef Darwiche a/k/a Mohamad Darwich	08/30/1996	The payment of approximately \$1,439 to JR Tobacco Wholesale.
47	Ali Hussein Darwiche a/k/a Ali Hussein Darwich	01/15/1997	The payment of approximately \$808 to JR Tobacco Wholesale.
48	Angela Georgia Tsioumas a/k/a Angie Tsioumas	01/22/1998	The payment of approximately \$3,963 to Sam's Club.
49	Mohamad Youssef Hammoud a/k/a Ali A. A. Abousaleh a/k/a Ali A. A. Albousaleh Hussein Chahrour a/k/a Hussein R. Chahrour a/k/a Hussein R. Chahriour a/k/a Samuel R. Chahour a/k/a Sam Chahrour	06/03/1997	The wire transfer of \$17,000 by Hussein Chahrour to Mohamad Youssef Hammoud as payment for the purchase of contraband cigarettes.

All in violation of Title 18, United States Code, Sections 1956(a)(1) and 2.

**COUNT FIFTY THROUGH FIFTY-TWO**

On or about the following dates, within the Western District of North Carolina, and elsewhere,

**MOHAMAD YOUSSEF HAMMOUD**

a/k/a Ali A. A. Abousaleh

a/k/a Ali A. A. Albousaleh

**CHAWKI YOUSSEF HAMMOUD**

a/k/a Ali Darwiche Hussein

**MOHAMAD ATEF DARWICHE**

a/k/a Mohamad Darwich

**ALI FAYEZ DARWICH**

a/k/a Ali Darwich

a/k/a Ali Darwich

**ANGELA GEORGIA TSIOUMAS**

a/k/a Angie Tsioumas

and others known and unknown to the grand jury, did knowingly and willfully conduct and attempt to conduct the following financial transactions affecting interstate and foreign commerce.

1. The defendants knew that property involved in the financial transactions represented the proceeds of some form of unlawful activity.
2. The financial transactions in fact involved the proceeds of specified unlawful activity (that is, proceeds of a conspiracy to smuggle contraband cigarettes in violation of Title 18 United States Code, Section 2342).
3. The defendants intended to promote the carrying on of specified unlawful activity and knew that the transactions were designed in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of said specified unlawful activity.
4. The defendants and others known and unknown to the grand jury, did aid, abet, command, and induce each other, and willfully cause the commission of said transactions.

Count	Date	Transaction
50	12/17/1998	The payment of \$6,000 to MasterCard.
51	01/09/1999	The payment of \$7,000 to Visa
52	01/14/1999	The payment of \$3,500 to MasterCard

All in violation of Title 18, United States Code, Sections 1956(a)(1) and 2.

**COUNT FIFTY-THREE**

From on or about January 17, 1998, through on or about May 8, 1998, in Iredell County, within the Western District of North Carolina, and elsewhere, the defendants,

**MOHAMAD YOUSSEF HAMMOUD**  
a/k/a Ali A. A. Abousaleh  
a/k/a Ali A. A. Albousaleh  
**BASSAM YOUSSEF HAMOOD**  
a/k/a Bassem Hammoud  
a/k/a Bassam Hammoud  
**ANGELA GEORGIA TSIOUMAS**  
a/k/a Angie Tsiousmas

and others known and unknown to the grand jury, did knowingly, willfully and unlawfully combine, conspire, confederate and agree with each other, and others both known and unknown to the grand jury, to use one or more counterfeit access devices and to use one or more unauthorized access devices during a one-year period to obtain something of value aggregating \$1,000.00 or more, and by such conduct did affect interstate commerce, in violation of Title 18, United States Code, Sections 1029(a)(1) and 1029(a)(2).

In furtherance of the conspiracy, the defendants committed one or more of the following overt acts:

1. In or about May 20, 1997, MOHAMAD YOUSSEF HAMMOUD obtained a fictitious North Carolina driver's license in the name of Ali Albousaleh.
2. In or about January 17, 1998, MOHAMAD YOUSSEF HAMMOUD submitted a false credit card application to Centura Bank in which he claimed that his name was Ali Albousaleh.
3. From on or about January 17, 1998 through on or about May 8, 1998, ANGELA GEORGIA TSIOUMAS, and BASSAM YOUSSEF HAMOOD used a counterfeit and unauthorized credit card in the name of Ali Albousaleh to purchase cigarettes which were smuggled out of the State of North Carolina and into the State of Michigan without the payment of the Michigan taxes on those cigarettes.
4. On or about March 7, 1998, BASSAM YOUSSEF HAMOOD signed a credit card slip for the use of the credit card in the name of Ali Albousaleh.

5. On or about May 8, 1998, ANGELA GEORGIA TSIUMAS used her North Carolina driver's license in connection with the purchase of cigarettes through the use of a counterfeit and unauthorized credit card in the name of Ali Albousaleh.

All in violation of Title 18, United States Code, Section 1029(b)(2).

**COUNT FIFTY-FOUR**

From on or about January 17, 1998, through on or about May 8, 1998, in Iredell County, within the Western District of North Carolina, and elsewhere, the defendants,

**MOHAMAD YOUSSEF HAMMOUD**  
a/k/a Ali A. A. Abousaleh  
a/k/a Ali A. A. Albousaleh  
**BASSAM YOUSSEF HAMMOUD**  
a/k/a Bassem Hammoud  
a/k/a Bassam Hammoud  
**ANGELA GEORGIA TSIUMAS**  
a/k/a Angie Tsioumas

and others known and unknown to the grand jury, aiding and abetting each other, did knowingly and with intent to defraud, use one or more counterfeit access devices, namely credit cards in the name of Ali Albousaleh, and by such conduct did affect interstate commerce.

All in violation of Title 18, United States Code, Sections 1029(a)(1) and 2.

**COUNT FIFTY-FIVE**

From on or about January 17, 1998, through on or about May 8, 1998, in Iredell County, within the Western District of North Carolina, and elsewhere, the defendants,

**MOHAMAD YOUSSEF HAMMOUD**  
a/k/a Ali A. A. Abousaleh  
a/k/a Ali A. A. Albousaleh  
**BASSAM YOUSSEF HAMMOUD**  
a/k/a Bassem Hammoud  
a/k/a Bassam Hammoud  
**ANGELA GEORGIA TSIUMAS**  
a/k/a Angie Tsioumas

and others known and unknown to the grand jury, aiding and abetting each other, did knowingly and with intent to defraud, use one or more unauthorized access devices, namely credit cards in the name

of Ali Albousaleh, within a one-year period to obtain something of value aggregating \$1,000.00 or more during that period, and by such conduct did affect interstate commerce.

All in violation of Title 18, United States Code, Sections 1029(a)(2) and 2.

**COUNT FIFTY-SIX**

On or about November 22, 1997, through on or about May 22, 2000, in Mecklenburg and Iredell Counties, within the Western District of North Carolina, and elsewhere,

**CHAWKI YOUSSEF HAMMOUD**  
a/k/a Ali Darwiche Hussein

and others known and unknown to the grand jury, aiding and abetting each other, did knowingly and with intent to defraud, use one or more counterfeit access devices, namely credit cards in the name of Ali Darwiche Hussein, a/k/a Ali Dhussein, and Harb Mustapha, and by such conduct did affect interstate commerce.

All in violation of Title 18, United States Code, Sections 1029(a)(1) and 2.

**COUNT FIFTY-SEVEN**

On or about November 22, 1997, through on or about May 22, 2000, in Mecklenburg and Iredell Counties, within the Western District of North Carolina, and elsewhere,

**CHAWKI YOUSSEF HAMMOUD**  
a/k/a Ali Darwiche Hussein

and others known and unknown to the grand jury, aiding and abetting each other, did knowingly and with intent to defraud, use one or more unauthorized access devices, namely a credit card in the name of Ali Darwiche Hussein, a/k/a Ali Dhussein, and Harb Mustapha, within a one-year period to obtain something of value aggregating \$1,000.00 or more during that period, and by such conduct did affect interstate commerce.

All in violation of Title 18, United States Code, Sections 1029(a)(2) and 2.

**COUNT FIFTY-EIGHT**

From on or about July 28, 1997, through on or about May 26, 2000; in Iredell County, within the Western District of North Carolina, and elsewhere,

**SAID MOHAMAD HARB**  
a/k/a Mustapha Harb  
a/k/a Harb Mustapha  
a/k/a Ahmed Al Alqam  
a/k/a Ahmed Am  
a/k/a Mohamad Dbouk

and others known and unknown to the grand jury, aiding and abetting each other, did knowingly and with intent to defraud, use one or more counterfeit access devices, namely credit cards in the names of Harb Mustapha and Ahmed Am, and by such conduct did affect interstate commerce.

All in violation of Title 18, United States Code, Sections 1029(a)(1) and 2.

**COUNT FIFTY-NINE**

From on or about July 28, 1997, through on or about May 26, 2000, in Iredell County, within the Western District of North Carolina, and elsewhere,

**SAID MOHAMAD HARB**  
a/k/a Mustapha Harb  
a/k/a Harb Mustapha  
a/k/a Ahmed Al Alqam  
a/k/a Ahmed Am  
a/k/a Mohamad Dbouk

and others known and unknown to the grand jury, aiding and abetting each other, did knowingly and with intent to defraud, use one or more unauthorized access devices, namely credit cards in the names of Harb Mustapha and Ahmed Alqam, within a one-year period to obtain something of value aggregating \$1,000.00 or more during that period, and by such conduct did affect interstate commerce.

All in violation of Title 18, United States Code, Sections 1029(a)(2) and 2.

**COUNT SIXTY**

From on or about March 27, 2000, through on or about July 21, 2000, in Mecklenburg County, within the Western District of North Carolina,

**SAID MOHAMAD HARB**  
a/k/a Mustapha Harb  
a/k/a Ahmed Al Alqam  
a/k/a Ahmed Am  
a/k/a Mohamad Dbouk

and others known and unknown to the grand jury, aiding and abetting each other, corruptly gave, offered, and promised something of value in excess of \$100.00 to an employee of First Union National Bank, a financial institution with deposits then insured by the Federal Deposit Insurance Corporation, with the intent to influence and/or reward such person in connection with business and transactions of that institution, in that, SAID MOHAMAD HARB, in return for the employee of the financial institution reactivating a closed account in the name of an individual who had left the country to permit SAID MOHAMAD HARB to execute a check fraud scheme, offered or did offer to pay the employee of the financial institution a percentage of the deposits made to the account and did, in fact, pay the employee of the financial institution cash bribes totaling approximately \$1,500.

All in violation of Title 18, United States Code, Sections 215(a)(1) and 2.

**COUNTS SIXTY-ONE THROUGH SIXTY-SEVEN**

From on or about August 2, 1996, and continuing through February 3, 1999, in Mecklenburg County, within the Western District of North Carolina, and elsewhere,

**MOHAMAD YOUSSEF HAMMOUD**  
a/k/a Ali A. A. Abousaleh  
a/k/a Ali A. A. Albousaleh  
**BASSAM YOUSSEF HAMMOUD**  
a/k/a Bassem Hammoud  
a/k/a Bassam Hammoud  
**CHAWKI YOUSSEF HAMMOUD**  
a/k/a Ali Darwiche Hussein  
**ALI HUSSEIN DARWICHE**  
a/k/a Ali Hussein Darwich  
**MOHAMAD ATEF DARWICHE**  
a/k/a Mohamad Darwich  
**SAID MOHAMAD HARB**  
a/k/a Mustapha Harb

a/k/a Ahmed Al Alqam  
a/k/a Ahmed Am  
a/k/a Mohamad Dhouk  
**ANGELA GEORGIA TSIOUMAS**  
a/k/a Angie Tsoumas

and others known and unknown to the grand jury, aiding and abetting each other, devised and intended to devise a scheme and artifice to defraud and to obtain money and property by means of false and fraudulent pretenses, representations, and promises, that is they purchased and transported cigarettes which were smuggled into the State of Michigan without the payment of the taxes levied on those cigarettes by the State of Michigan. For the purpose of executing the scheme and artifice described above, the defendants did cause to be placed in an authorized depository for mail, the mail matter as described below, for delivery by the United States Postal Service and private or commercial interstate mail carriers, payments for charges made on those credit cards on or about the dates and to the recipients identified below:

COUNT	DATE	ITEM MAILED	RECIPIENT
61	08/02/1996	Credit card payment of \$2,954 by Mohamad Youssef Hammoud	Prudential Bank
62	07/25/1997	Credit card payment of \$2,150 by Bassam Hamood	Citibank
63	08/20/1997	Credit card payment of \$7,203 by Said Mohamed Harb	Advanta National Bank
64	12/10/1997	Credit card payment of \$6,500 by Angela Georgia Tsoumas	MBNA
65	06/01/1998	Credit card payment of \$1,175 by Ali Hussein Darwiche	Citibank
66	06/08/1998	Credit card payment of \$3,000 by Mohamad Atef Darwiche	Household Credit
67	02/03/1999	Credit card payment of \$2,081 caused by Chawki Youssef Hammoud	Discover Card

All in violation of Title 18, United States Code, Sections 1341 and 2.

**COUNT SIXTY-EIGHT**

Beginning on or about March 27, 2000, and continuing to on or about July 21, 2000, in Mecklenburg County, within the Western District of North Carolina, and elsewhere,

**SAID MOHAMAD HARB**  
a/k/a Mustapha Harb  
a/k/a Ahmed Al Alqam  
a/k/a Ahmed Am  
a/k/a Mohamad Dbouk  
**MOHIT BEHL**  
a/k/a Mee Yln Foo  
a/k/a Rohit Behl  
a/k/a Navid Katel

and others known and unknown to the grand jury, aiding and abetting each other, knowingly and unlawfully executed and attempted to execute a scheme or artifice to defraud First Union National Bank located in Charlotte, North Carolina, and to obtain monies or funds owned by or under the custody and control of First Union National Bank by means of false and fraudulent pretenses and representations, a financial institution with deposits then insured by the Federal Deposit Insurance Corporation. During the course and in the furtherance of the scheme or artifice:

1. On or about March 27, 2000, SAID MOHAMAD HARB and MOHIT BEHL with the assistance of a bank officer, reopened an inactive bank account at First Union National Bank in the name of an individual who had left the country.
2. SAID MOHAMAD HARB and MOHIT BEHL used customer information obtained through their Internet website to print unauthorized bank drafts.
3. SAID MOHAMAD HARB deposited these unauthorized bank drafts into the aforementioned bank account at First Union National Bank.
4. On at least three occasions, deposited funds were withdrawn from the account.

All in violation of Title 18, United States Code, Sections 1344 and 2.

**COUNT SIXTY-NINE**

Beginning on or about June 15, 1999, and continuing to on or about July 21, 2000, in Mecklenburg County, within the Western District of North Carolina, and elsewhere,

**SAID MOHAMAD HARB**  
**a/k/a Mustapha Harb**  
**a/k/a Ahmed Al Alqam**  
**a/k/a Ahmed Am**  
**a/k/a Mohamad Dbouk**

and others known and unknown to the grand jury, aiding and abetting each other, knowingly and unlawfully executed and attempted to execute a scheme or artifice to defraud Wachovia Bank and Centura Bank located in Charlotte, North Carolina, and to obtain monies or funds owned by or under the custody and control of Wachovia Bank and Centura Bank by means of false and fraudulent pretenses and representations, financial institutions with deposits then insured by the Federal Deposit Insurance Corporation. During the course and in the furtherance of the scheme or artifice:

1. On or about June 15, 1999, SAID MOHAMAD HARB purchased a Certificate of Deposit and opened a checking account with a line of credit under the name of Mohamad Dbouk at Wachovia Bank using funds from another of his alias accounts.
2. On or about March 27, 2000, SAID MOHAMAD HARB applied for a credit card account with Centura Bank under the name of Mee Yin Foo. The following day, HARB signed the signature of Mee Yin Foo to the application which was used to obtain the credit card from Centura Bank.
3. On or about April 19, 2000, SAID MOHAMAD HARB opened a checking account and a line of credit in the name of Khadija Debk at Wachovia Bank. HARB signed the signature of Khadija Debk on the application which was used to obtain the account and line of credit.

All in violation of Title 18, United States Code, Sections 1344.

**COUNT SEVENTY**

On or about August 15, 1999, in Charlotte, within the Western District of North Carolina and elsewhere,

**SAID MOHAMAD HARB**  
a/k/a Mustapha Harb  
a/k/a Ahmed Al Alqam  
a/k/a Ahmed Am  
a/k/a Mohamad Dbouk  
**MOHIT BEHL**  
a/k/a Mee Yin Foo  
a/k/a Rohit Behl  
a/k/a Navid Katel

and others known and unknown to the grand jury, aiding and abetting each other, did unlawfully transport and transfer, and cause the transportation and transfer, in interstate commerce from Vancouver, Canada, to and through the State of North Carolina and others, stolen goods, wares and merchandise, that is a digital camera, camcorder and laptop computers, of the value of \$ 5,000 or more, knowing the same to have been stolen or taken by fraud.

All in violation of Title 18, United States Code, Section 2314 and 2.

**COUNT SEVENTY-ONE**

**THE ENTERPRISE**

1. At various times relevant to this indictment,

**MOHAMAD YOUSSEF HAMMOUD**  
a/k/a Ali A. A. Abousaleh  
a/k/a Ali A. A. Albousaleh  
**BASSAM YOUSSEF HAMMOUD**  
a/k/a Bassem Hammoud  
a/k/a Bassam Hammoud  
**CHAWKI YOUSSEF HAMMOUD**  
a/k/a Ali Darwiche Hussein  
**MOHAMAD ATEF DARWICHE**  
a/k/a Mohamad Darwich  
**ALI HUSSEIN DARWICHE**  
a/k/a Ali Hussein Darwich  
**ALI FAYEZ DARWICHE**

a/k/a Ali Darwich  
a/k/a Ali Darwieh  
**SAID MOHAMAD HARB**  
a/k/a Mustapha Harb  
a/k/a Ahmed Al Alqam  
a/k/a Ahmed Am  
a/k/a Mohamad Dbouk  
**ANGELA GEORGIA TSIOUMAS**  
a/k/a Angie Tsoumas  
**MEHDI HACHEM MOUSSAOUI**  
a/k/a Mehdi Moussoui  
a/k/a Mehdi Masawi

Eastway Tobacco, Queen Tobacco, Cedars Restaurant and Deli, Alico Painting Company, Digital Karma and M&A Oil Company and others known and unknown, were members and associates of the "Charlotte Hizballah Cell," an organization whose members were located primarily in the greater Charlotte, North Carolina area.

2. The Charlotte Hizballah Cell, including its leadership, membership and associates, constituted an "enterprise," as defined by Title 18, United States Code, Section 1961(4) (hereinafter "the enterprise"), that is, a group of individuals and entities associated in fact. This enterprise was engaged in, and its activities affected, interstate and foreign commerce.

**PURPOSES OF THE ENTERPRISE**

3. The purposes of the enterprise included the following:
  - a. To fraudulently and through bribery gain and obtain Immigration benefits, that is, entry into the United States, permanent resident alien status, and citizenship.
  - b. To enrich the members and associates of the enterprise through, among other means, the smuggling of contraband cigarettes, the use of alias names to commit credit card, mail, wire and bank fraud, money laundering, and bribery.
  - c. To provide some of the illegal proceeds of the enterprise to Hizballah, a designated foreign terrorist organization. Hizballah is also known as Party of God, Islamic Jihad, Islamic Jihad Organization, Revolutionary Justice Organization, Organization of the Oppressed on Earth, Islamic Jihad for the

Liberation of Palestine, Organization of Right Against Wrong, Ansar Allah and Followers of the Prophet Muhammad.

- d. To promote and enhance the enterprise and its members' and associates' activities.

**MEANS AND METHODS**

- 4. Among the means and methods by which the defendants and their associates conducted and participated in the conduct of the affairs of the enterprise were the following:
  - a. Attempting to bribe government officials, and bribing bank officials, to obtain Immigration benefits or access to credit.
  - b. Entering into fraudulent marriages with United States citizens, and filing false documents with the Immigration and Naturalization Service and the Department of State, for the purpose of fraudulently obtaining Immigration benefits, that is, entry into the United States, acquisition of permanent resident alien status or citizenship.
  - c. Purchasing of bulk quantities of contraband cigarettes in North Carolina and thereafter smuggling them to Michigan for resale for the purpose of avoiding the due and owing cigarette tax imposed by the State of Michigan.
  - d. Using alias names to acquire false identifications, bank accounts and credit cards for the purpose of committing fraud against banks, businesses and credit card companies.
  - e. Laundering the proceeds of criminal activity either to promote the carrying on of the illegal activity, or to disguise or conceal the nature, the location, the source, the ownership or the control of the illegal proceeds.
  - f. Providing some of the proceeds of the illegal activities of the enterprise, and material support and resources, to Hizballah, a designated foreign terrorist organization, by wire transfers and couriers.

**THE RACKETEERING CONSPIRACY**

5. From on or about June 6, 1992, and continuing until July 21, 2000, both dates being approximate and inclusive, in the Western District of North Carolina and elsewhere, the defendants,

**MOHAMAD YOUSSEF HAMMOUD**

a/k/a Ali A. A. Abousaleh

a/k/a Ali A. A. Albousaleh

**BASSAM YOUSSEF HAMMOUD**

a/k/a Bassem Hammoud

a/k/a Bassam Hammoud

**CHAWKI YOUSSEF HAMMOUD**

a/k/a Ali Darwiche Hussein

**MOHAMAD ATEF DARWICHE**

a/k/a Mohamad Darwich

**ALI HUSSEIN DARWICHE**

a/k/a Ali Hussein Darwich

**ALI FAYEZ DARWICHE**

a/k/a Ali Darwich

a/k/a Ali Darwich

**SAID MOHAMAD HARB**

a/k/a Mustapha Harb

a/k/a Ahmed Al Alqam

a/k/a Ahmed Am

a/k/a Mohamad Dbouk

**ANGELA GEORGIA TSIOUMAS**

a/k/a Angie Tsioumas

**MEHDI HACHEM MOUSSAOUI**

a/k/a Mehdi Moussoui

a/k/a Mehdi Masawi

**HUSSEIN CHAHROUR**

a/k/a Hussein R. Chahrour

a/k/a Hussein R. Chahrour

a/k/a Samuel R. Chahour

a/k/a Sam Chahrour

together with other persons known and unknown, being persons employed by and associated with the Charlotte Hizballah Cell, an enterprise as defined in Title 18, United States Code, Section 1961(4), which engaged in, and the activities of which, affected interstate and foreign commerce, knowingly, willfully and intentionally conspired to violate Title 18, United States Code, Section 1962(c), that is, to conduct

and participate, directly and indirectly, in the conduct of the affairs of that enterprise through a pattern of racketeering activity, as that term is defined by Title 18, United States Code, Section 1961(1) and (5). The pattern of racketeering activity through which the defendants agreed to conduct the affairs of the enterprise consisted of the acts set forth in Counts Two, Four, Seven, Twelve, Thirty-four, and Thirty-six through Forty-two of this Indictment, which are incorporated as if fully set forth herein, and as set forth below.

6. It was a part of the conspiracy that the defendants agreed that a conspirator would commit at least two acts of racketeering in the conduct of the affairs of the enterprise.

All in violation of Title 18, United States Code, Section 1962(d).

**THE PATTERN OF RACKETEERING ACTIVITY**

**RACKETEERING ACT NO. ONE**

On or about June 6, 1992, in New York City, New York, within the United States of America,

**MOHAMAD YOUSSEF HAMMOUD**

a/k/a Ali A. A. Abousaleh

a/k/a Ali A. A. Albousaleh

did knowingly use, attempt to use and possess, a non-immigrant visa for entry into or as evidence of authorized stay or employment in the United States, that is a U. S. Non-Immigrant Visa (B-2), which the defendant knew to be counterfeited in that the defendant, upon arrival at JFK International Airport, New York City, New York, from Venezuela, presented a Lebanese passport bearing a counterfeit U. S. Non-Immigrant Visa (B-2) purportedly issued at Caracas, Venezuela, in violation of Title 18, United States Code, Section 1546(a).

**RACKETEERING ACT NO. TWO**

On or about August 3, 1995, in New York City, New York, within the United States of America,

**MOHAMAD YOUSSEF HAMMOUD**

a/k/a Ali A. A. Abousaleh

a/k/a Ali A. A. Albousaleh

a native and citizen of Lebanon, did knowingly present to the Immigration and Naturalization Service in New York City, New York, an Application to Register Permanent Residence or Adjust Status (INS Form I-485), which contained a statement MOHAMAD YOUSSEF HAMMOUD, a/k/a Ali A. A.

Abousaleh, a/k/a Ali A. A. Albousaleh, then and there knew was false, to wit, MOHAMAD YOUSSEF HAMMOUD, a/k/a Ali A. A. Abousaleh, a/k/a Ali A. A. Albousaleh, represented to the Immigration and Naturalization Service that on July 7, 1994, he was married to Sabina Lucas Edwards, a United States citizen, knowing that his marriage to Sabina Lucas Edwards was a sham, false and fraudulent marriage entered into for the purpose of enabling MOHAMAD YOUSSEF HAMMOUD, a/k/a Ali A. A. Abousaleh, a/k/a Ali A. A. Albousaleh, to secure permanent resident alien status in the United States, in violation of Title 18, United States Code, Section 1546(a).

**RACKETEERING ACT NO. THREE**

On or about June 6, 1992, in New York City, New York, within the United States of America,

**MOHAMAD ATEF DARWICHE**  
a/k/a Mohamad Darwich

did knowingly use, attempt to use and possess, a non-immigrant visa for entry into or as evidence of authorized stay or employment in the United States, that is a U. S. Non-Immigrant Visa (B-2), which the defendant knew to be counterfeited in that the defendant, upon arrival at JFK International Airport, New York City, New York, from Venezuela, presented a Lebanese passport bearing a counterfeit U. S. Non-Immigrant Visa (B-2) purportedly issued at Caracas, Venezuela, in violation of Title 18, United States Code, Section 1546(a).

**RACKETEERING ACT NO. FOUR**

On or about April 18, 1994, in New York City, New York, within the United States of America,

**ALI HUSSEIN DARWICHE**  
a/k/a Ali Hussein Darwich

a native and citizen of Lebanon, did knowingly present to the Immigration and Naturalization Service in New York City, New York, an Application to Register Permanent Residence or Adjust Status (INS Form I-485), which contained a statement ALI HUSSEIN DARWICHE, a/k/a Ali Hussein Darwich, then and there knew was false, to wit, ALI HUSSEIN DARWICHE, a/k/a Ali Hussein Darwich, represented to the Immigration and Naturalization Service that on February 17, 1994, he was married to Diana Martinez, a United States citizen, knowing that his marriage to Diana Martinez was a sham, false and fraudulent marriage entered into for the purpose of enabling ALI HUSSEIN DARWICHE, a/k/a Ali Hussein Darwich, to secure permanent resident alien status in the United States, in violation of Title 18, United States Code, Section 1546(a).

**RACKETEERING ACT NO. FIVE**

On or about June 6, 1992, in New York City, New York, within the United States of America,

**ALI FAYEZ DARWICHE**  
a/k/a Ali Darwich  
a/k/a Ali Darwich

did knowingly use, attempt to use and possess, a non-immigrant visa for entry into or as evidence of authorized stay or employment in the United States, that is a U. S. Non-Immigrant Visa (B-2), which the defendant knew to be counterfeited in that the defendant, upon arrival at JFK International Airport, New York City, New York, from Venezuela, presented a Lebanese passport bearing a counterfeit U. S. Non-Immigrant Visa (B-2) purportedly issued at Caracas, Venezuela, in violation of Title 18, United States Code, Section 1546(a).

**RACKETEERING ACT NO. SIX**

On or about August 3, 1995, in New York City, New York, within the United States of America,

**ALI FAYEZ DARWICHE**  
a/k/a Ali Darwich  
a/k/a Ali Darwich

a native and citizen of Lebanon, did knowingly present to the Immigration and Naturalization Service in New York City, New York, an Application to Register Permanent Residence or Adjust Status (INS Form I-485), which contained a statement ALI FAYEZ DARWICHE, a/k/a Ali Favez Darwich, a/k/a Ali Darwich, then and there knew was false, to wit, ALI FAYEZ DARWICHE, a/k/a Ali Favez Darwich, a/k/a Ali Darwich, represented to the Immigration and Naturalization Service that on May 23, 1995, he was married to Tenecia Jemison, a United States citizen, knowing that his marriage to Tenecia Jemison was a sham, false and fraudulent marriage entered into for the purpose of enabling ALI FAYEZ DARWICHE, a/k/a Ali Favez Darwich, a/k/a Ali Favez Darwich, to secure permanent resident alien status in the United States, in violation of Title 18, United States Code, Section 1546(a).

**COUNT SEVENTY-TWO**

**CONSPIRACY TO PROVIDE MATERIAL SUPPORT OR  
RESOURCES TO A DESIGNATED FOREIGN TERRORIST ORGANIZATION**

1. On October 8, 1997, by publication in the Federal Register, Secretary of State Madeleine K. Albright designated Hizballah as a foreign terrorist organization pursuant to Section 219 of the Immigration and Nationality Act, as added by the

Antiterrorism and Effective Death Penalty Act of 1996, Pub. L. No. 104-132, § 302, 110 Stat. 1214, 1248 (1996), and amended by the Illegal Immigration Reform and Immigrant Responsibility Act of 1996, Pub. L. No. 104-208, 110 Stat. 3009 (1996). 62 Fed. Reg. 52,650 (1997). On October 8, 1999, by publication in the Federal Register, Secretary Albright re-designated Hizballah as a foreign terrorist organization. 64 Fed. Reg. 55,112 (1999). Hizballah is also known as Party of God, Islamic Jihad, Islamic Jihad Organization, Revolutionary Justice Organization, Organization of the Oppressed on Earth, Islamic Jihad for the Liberation of Palestine, Organization of Right Against Wrong, Ansar Allah and Followers of the Prophet Muhammad.

2. Beginning from an unknown time prior to February 24, 1999, and continuing until on or about July 21, 2000, in the Western District of North Carolina and elsewhere,

**SAID MOHAMAD HARB**

a/k/a Mustapha Harb  
a/k/a Ahmed Al Alqam  
a/k/a Ahmed Am  
a/k/a Mohamad Dbouk

**ALI ADHAM AMHAZ**

a/k/a Ali Amhaz

**MOHAMAD HASSAN DBOUK**

a/k/a Haj Mohamad Hassan Dbouk  
a/k/a Mohamad Dbouk  
a/k/a Mohamad Dabouk  
a/k/a Mohamad Dabook  
a/k/a Hohamad Hassan Dbouk

**HASSAN HILU LAQIS**

a/k/a Haj Hassan Hilu Laquis  
a/k/a Hassan Lakkis  
a/k/a Hassan Laquis  
a/k/a Hussein Hassan  
a/k/a Hassan Husseln Laquis  
a/k/a Hassan Al-Lakkis

with each other and with others known and unknown to the Grand Jury, did knowingly conspire to provide material support or resources to Hizballah, a designated foreign terrorist organization, in violation of Title 18, United States Code, Section 2339B.

**OBJECT OF THE CONSPIRACY**

3. The object of the conspiracy was to provide currency, financial services, training, false documentation and identification, communications equipment, explosives, and other physical assets to Hizballah, in order to facilitate its violent attacks.

**MANNER AND MEANS OF THE CONSPIRACY**

4. Among the means used by the defendants and co-conspirators to further the objects of the conspiracy were the following:
  - a. The defendants agreed covertly to provide a variety of services and tangible items to Hizballah and its operatives in the Middle East, in order to assist Hizballah's engagement in and promotion of violent attacks. The defendants thereafter performed such services and acquired such items, which they arranged to have secretly transported to Hizballah operatives in the Middle East.
  - b. Defendant SAID MOHAMAD HARB, a resident of Charlotte, North Carolina, was a longtime acquaintance of the defendant MOHAMAD HASSAN DBOUK who, at times relevant to this Indictment, resided in Vancouver, Canada and Lebanon. HARB agreed to assist DBOUK in obtaining money and electronic equipment that would be secretly delivered to Hizballah operatives in Lebanon.
  - c. Defendants HARB and DBOUK's efforts were guided by the defendant HASSAN HILU LAQIS, a resident of Lebanon, who was in charge of Hizballah's procurement of technical equipment from North America, provided instructions on what items of equipment Hizballah needed to obtain from retail stores and military warehouses in the United States and Canada. Such efforts were assisted by the defendant ALI ADHAM AMHAZ, a resident of Vancouver, Canada and DBOUK's brother-in-law, who made purchases and helped arrange for their delivery to Lebanon. The defendant LAQIS, on behalf of Hizballah, would order the procurement of certain items of equipment through telephone calls and facsimiles sent to DBOUK. DBOUK, in turn, would communicate those instructions to HARB, AMHAZ and other persons known and unknown to the Grand Jury. When DBOUK returned to Lebanon in the summer of 1999, the Hizballah procurement efforts continued with DBOUK communicating LAQIS' instructions to AMHAZ from afar.
  - d. Defendant HARB's role in providing material support or resources to Hizballah in Lebanon was based in part on his experience with fraudulent

credit card schemes. HARB referred to one such scheme as "busting out credit cards," whereby credit cards were acquired using false names, used extensively over a short period of time until their credit limits were exhausted, and then abandoned without any intent to repay the resulting credit card debt. In a variation of this scheme, defendants HARB, AMHAZ, and DBOUK acquired and used fraudulent credit cards which were manufactured to appear and operate as legitimate credit cards issued by legitimate companies. Under the plan, the defendants and other persons known and unknown to the Grand Jury would use the credit cards described above in spending spree until either the exhaustion of the cards' credit limit or termination of the account, at which point they would possess purchased items for Hizballah, as well as or for their own personal use. The items purchased for Hizballah would be sent to Hizballah operatives in Lebanon, and in exchange, Hizballah would pay the defendants and others cash in amounts that were a fraction of the cost of the items.

- e. In some cases, the defendants would acquire items requested by LAQIS through regular purchases that did not involve the use of fraudulent credit cards. In such situations, DBOUK, after receiving instructions from LAQIS, would instruct AMHAZ and others known and unknown to the Grand Jury to acquire specific items from retail stores and military warehouses in Canada and the United States. These purchases would be financed by money LAQIS and Hizballah provided to the purchasers, sometimes after the purchase. DBOUK and AMHAZ would then cause the delivery of the purchased items to Lebanon in ways designed to conceal the identity and source of such items from Customs authorities in the United States, Canada and Lebanon.
- f. The defendants planned to acquire a variety of items that Hizballah would use to engage in violent attacks and to film such attacks for use in Hizballah propaganda efforts. These items included:
  - 1. night vision devices (goggles, cameras, and scopes);
  - 2. surveying equipment;
  - 3. global positioning systems (watches and aviation antennas);
  - 4. mine and metal detection equipment;
  - 5. video equipment;
  - 6. advanced aircraft analysis and design software;

7. computer equipment (laptops, high-speed modems, processors, joysticks, plotters, scanners, and printers);
  8. stun guns;
  9. handheld radios and receivers;
  10. cellular telephones;
  11. nitrogen cutters;
  12. mining, drilling, and blasting equipment;
  13. military style lensatic compasses;
  14. binoculars;
  15. naval equipment;
  16. radars;
  17. ultrasonic dog repellers;
  18. laser range finders; and,
  19. camera equipment (digital cameras, zoom lenses, tubes, and film scanners).
- g. Members of the conspiracy obtained and arranged for the secret delivery of certain of these items to Hizballah in Lebanon.
- h. The defendants provided a number of services to Hizballah in support of its procurement efforts and its violent goals. These services included wiring money between accounts controlled by Hizballah operatives, obtaining fraudulent identification for use in Hizballah procurement activity, and evaluating the arrangement of life insurance for Hizballah operatives who could be killed in the course of Hizballah-directed terrorist attacks.
- i. The defendants spoke to each other and to other persons known and unknown to the Grand Jury about their respective roles in the Hizballah North American procurement program, about the need to be cautious in discussing Hizballah

matters and identifying its leaders by name, and on the best means of delivering items to Hizballah without attracting the attention of law enforcement officials.

OVERT ACTS

In furtherance of the conspiracy and to accomplish the object of the conspiracy, defendants and others committed the following overt acts, among others, in the Western District of North Carolina and elsewhere:

1. On or about February 24, 1999, defendant HARB wired \$4,000 U.S. dollars ("USD") to defendant DBOUK's bank account at the Bank of Nova Scotia for DBOUK's use in purchasing computer products.
2. On or about February 24, 1999, defendant DBOUK contacted the Bank of Nova Scotia and discussed whether the \$4,000 USD wired by defendant HARB to DBOUK's bank account could be withdrawn.
3. On or about February 24, 1999, defendant HARB contacted defendant DBOUK and provided DBOUK with his cell phone number for the purpose of allowing the Bank of Nova Scotia to verify the source of the \$4,000 USD wired to DBOUK's account.
4. On or about February 25, 1999, defendant DBOUK contacted the Bank of Nova Scotia to provide defendant HARB's cellular telephone number for the purpose of facilitating the release of the \$4,000 USD HARB had wired to DBOUK.
5. On or about March 3, 1999, defendant DBOUK transmitted a facsimile to defendant LAQIS containing information on hand held radios and air band transreceivers.
6. On or about March 3, 1999, defendant DBOUK withdrew the \$4,000 USD defendant HARB had wired to him at the Bank of Nova Scotia.
7. On or about March 3, 1999, defendant HARB telephoned defendant DBOUK and discussed the \$4,000 USD wired to DBOUK's account and how they needed to find another way to send money to DBOUK in the future.
8. On or about March 4, 1999, defendants DBOUK and AMHAZ visited a military supply warehouse in Vancouver, Canada to view military supplies and instruments available for purchase, and to obtain catalogues containing the prices and specifications of such items.

**Superseding Bill of Indictment**  
*USA v. Mohamad Youssef Hammoud, et al*  
3:00CR147-Mu  
Page 45 of 56

9. On or about March 5, 1999, defendant DBOUK telephoned defendant LAQIS and discussed the purchase of a \$4,000 computer.
10. On or about March 5, 1999, defendant DBOUK transmitted a facsimile to defendant LAQIS which described night vision cameras and computers available for purchase.
11. On or about March 5, 1999, defendant DBOUK telephoned defendant LAQIS and the latter instructed DBOUK to purchase computers.
12. On or about March 5, 1999, defendant DBOUK telephoned defendant LAQIS to confirm that he was able to purchase computers at discounted prices.
13. On or about March 5, 1999, defendant DBOUK telephoned defendant LAQIS and the latter instructed DBOUK to purchase computers, hard drives, card readers, a digital camera recorder with an optical lens, a computer plotter available for sale at \$10,000, and eight (8) digital cameras for \$8,000.
14. On or about March 5, 1999, defendant DBOUK transmitted a facsimile to defendant LAQIS which contained a list of night vision equipment (scopes, cameras, and goggles) and computers available for sale, along with their prices and specifications.
15. On or about March 11, 1999, defendant AMHAZ purchased night vision equipment for \$ 4,491.60 Canadian dollars with a credit card.
16. On or about March 12, 1999, defendant DBOUK telephoned defendant HARB and discussed DBOUK's role on behalf of Hizballah in Canada, the importance of his mission, the strength of his conviction, and HARB's belief that they should exercise caution in speaking about Hizballah matters by telephone.
17. On or about March 13, 1999, defendant DBOUK caused computers, digital cameras, hard drives, and night vision equipment to be delivered to defendant LAQIS in Lebanon by a personal courier.
18. On or about March 18, 1999, defendant DBOUK telephoned defendant HARB and instructed HARB to obtain a social security number and credit card in DBOUK's name so that DBOUK could work in the United States.
19. On or about June 10, 1999, defendant HARB obtained a fraudulent North Carolina drivers license in the name of "Hohamad Hassan Dbouk," a variation of the name of defendant DBOUK.

20. On or about June 16, 1999, in Charlotte defendant HARB caused money to be transferred from a bank account he controlled in the alias name of Ahmed Al Alq-Am to a new line of credit HARB opened at Wachovia Bank in the name of "Hohamad Hassan Dbouk," a variation of the name of defendant DBOUK.
21. In or about March 2000, defendant HARB while in Charlotte obtained a MasterCard credit card from Centura Bank in the name of defendant DBOUK.
22. In or about May 2000, defendant HARB while in Charlotte obtained a Visa credit card from Provident Bank in the name of defendant DBOUK.
23. On or about March 23, 1999, defendant LAQIS telephoned Defendant DBOUK and instructed DBOUK to purchase global positioning system ("GPS") units with aviation antennas.
24. On or about March 24, 1999, defendant HARB traveled from Charlotte, North Carolina, to Vancouver, British Columbia, to meet with defendants AMHAZ and DBOUK.
25. On or about March 27, 1999, defendant DBOUK caused cameras and night vision equipment to be delivered to defendant LAQIS in Lebanon by a personal courier.
26. Between on or about March 15 and March 29, 1999, defendant DBOUK telephoned defendant HARB and discussed whether HARB could provide forged checks to an associate of DBOUK's for his use in purchasing merchandise.
27. On or about April 20, 1999, defendant DBOUK transmitted a facsimile to LAQIS which confirmed the purchase of equipment and stressed DBOUK's willingness "to do anything you or the Father want me to do and I mean anything."
28. On or about April 21, 1999, defendant DBOUK telephoned defendant LAQIS and the latter instructed him to purchase a high-end camera for \$6,400 USD and seven adaptors for the camera.
29. On or about April 21, 1999, defendant DBOUK telephoned defendant LAQIS and discussed the deposit of \$40,000 in a Lebanese bank account in a manner that would avoid suspicion.
30. On or about April 26, 1999, defendant AMHAZ placed an order for a high-end camera lens whose purchase was requested by defendant LAQIS.

Superseding Bill of Indictment  
*USA v. Mohamad Youssef Hammoud, et al*  
3:00CR147-Mu  
Page 47 of 56

31. On or about April 26, 1999, defendant DBOUK telephoned defendant AMHAZ and discussed the purchase of a nitrogen cutter that defendant LAQIS had requested.
32. Between on or about April 27 and April 28, 1999, defendant DBOUK telephoned defendant HARB and others and discussed the manufacture of counterfeit translator stamps and seals.
33. On or about April 30, 1999, defendant DBOUK telephoned defendant LAQIS and the latter instructed DBOUK to purchase large quantities of cellular telephones.
34. On or about May 4, 1999, defendant LAQIS telephoned defendant DBOUK and instructed DBOUK to purchase a facsimile machine, assuring DBOUK that his expenses would be reimbursed by Hizballah.
35. On or about May 5, 1999, defendant LAQIS telephoned defendant DBOUK and instructed DBOUK to purchase a plotter and scanner, and assured DBOUK that he would send him \$18,000 USD with another individual to cover the cost of the machine.
36. On or about May 7, 1999, defendant DBOUK transmitted a facsimile to defendant LAQIS which contained price quotations on equipment.
37. On or about May 14, 1999, defendant DBOUK transmitted two (2) facsimiles to Lebanon, each of which contained a list of computer equipment and their prices.
38. On or about May 26, 1999, defendant DBOUK telephoned defendant HARB and discussed the possibility of obtaining life insurance for Hizballah operatives who might in a short period of time go for a "walk" and "never come back."
39. On or about May 26, 1999, defendant DBOUK contacted defendant AMHAZ and discussed the possibility of obtaining life insurance for thirty men in Lebanon which would cover the risk of death caused by bullets.
40. On or about May 30, 1999, defendant DBOUK telephoned defendant AMHAZ and discussed AMHAZ's taking over of Hizballah North American procurement activities upon DBOUK's scheduled return to Lebanon, and defendant LAQIS' support of this planned succession.
41. On or about May 31, 1999, defendant DBOUK telephoned defendant LAQIS and discussed the procurement of additional binoculars.

**Superseding Bill of Indictment**  
*USA v. Mohamad Youssef Hammoud, et al*  
3:00CR147-Mu  
Page 48 of 56

42. On or about June 1, 1999, defendant AMHAZ telephoned defendant DBOUK and discussed the need to avoid identifying certain Hizballah officials by name, with DBOUK explaining that the failure to take precautions could be dangerous.
43. On or about June 2, 1999, defendant DBOUK telephoned a vendor to discuss the availability and price of blasting equipment.
44. On or about June 7, 1999, another individual telephoned defendant DBOUK and discussed methods of providing material support to Hizballah without raising the attention of law enforcement authorities.
45. On or about June 7, 1999, defendant HARB provided defendant DBOUK with a mailing address used by HARB for alias identities.
46. On or about June 9, 1999, defendant DBOUK telephoned defendant LAQIS and discussed the acquisition of high-end photographic equipment and how such purchases would be funded.
47. On or about June 9, 1999, defendant DBOUK telephoned defendant LAQIS and the latter discussed the importance of the work DBOUK was doing in Canada and the need to remain there.
48. On or about June 9, 1999, defendant DBOUK telephoned defendant AMHAZ and discussed AMHAZ's promotion to DBOUK's position as the main purchasing agent for Hizballah in North America, and DBOUK elaborated that defendant LAQIS and others had "officially" discussed the subject.
49. On or about June 11, 1999, defendant DBOUK telephoned a vendor located in Leesburg, Virginia, to discuss the possible purchase of a "laser range finder" with a range of more than one thousand meters.
50. On or about June 20, 1999, defendant HARB telephoned defendant DBOUK and discussed the acquisition of counterfeit credit cards and false identification documents from a "committed" individual.
51. On or about June 25, 1999, defendant HARB telephoned defendant DBOUK and agreed to send DBOUK photographs to be used in the manufacture of false identification documents.
52. On or about June 29, 1999, defendant DBOUK telephoned defendant AMHAZ to discuss defendant LAQIS' request for additional computer laptops, dog repellents, and high voltage stun guns manufactured in the United States.

53. On or about July 1, 1999, defendant DBOUK telephoned defendant AMHAZ and discussed defendant AMHAZ's visit to Lebanon during which time he was expected to meet with Hizballah officials and obtain a list of items for future procurement in Canada, and how AMHAZ's expenses would be borne by Hizballah.
54. On or about July 2, 1999, defendant DBOUK telephoned defendant AMHAZ and discussed the need to purchase dog repellers and stuns guns, and how such devices should be sent to Lebanon from the United States since they were illegal in Canada.
55. On or about July 30, 1999, defendant HARB telephoned defendant AMHAZ and discussed how to use the fraudulent credit cards, and HARB offered to allow AMHAZ to use his cards to purchase whatever he wanted.
56. On or about August 7, 1999, defendant AMHAZ made a reservation for defendant HARB for an overnight stay on August 10, 1999, at the Best Western Chateau Granville in Vancouver, British Columbia.
57. On or about August 8, 1999, defendant HARB telephoned defendant AMHAZ and discussed the use of counterfeit credit cards.
58. On or about August 10, 1999, defendant HARB traveled to Vancouver, British Columbia, to meet defendant AMHAZ.
59. On or about August 11, 1999, defendant AMHAZ and defendant HARB obtained counterfeit credit cards and false identification documents.
60. On or about August 11, 1999, defendant DBOUK telephoned defendant HARB and discussed defendant HARB's use of the counterfeit credit cards and HARB's offer to purchase anything DBOUK wanted.
61. On or about August 11, 1999, defendant HARB gave defendant AMHAZ two (2) fraudulent credit cards for his use.
62. On or about August 30, 1999, defendant AMHAZ telephoned defendant DBOUK and discussed the purchase of 40-50 mine detectors and military binoculars.
63. On or about September 16, 1999, defendant HARB telephoned another individual and discussed the fact that he was expected to meet with defendant DBOUK in Lebanon and defendant AMHAZ in Vancouver over the next month.

64. On or about September 23, 1999, defendant DBOUK telephoned defendant AMHAZ and discussed defendant HARB's expected visit to Lebanon on September 25, 1999.
65. On or about October 9, 1999, defendant DBOUK telephoned defendant AMHAZ and instructed AMHAZ to purchase two (2) GPS watches valued at \$600 Canadian dollars.
66. On or about October 13, 1999, defendant AMHAZ telephoned another individual and discussed his intention to order 2 GPS watches from Canada and his intention to courier them to defendant DBOUK via another individual.
67. On or about October 16, 1999, defendant DBOUK telephoned defendant AMHAZ and discussed AMHAZ's purchase of various GPS devices.
68. On or about October 18, 1999, defendant AMHAZ telephoned a vendor to discuss the possible purchase of global positioning system devices that were capable of tracking vehicles in a 10,000 square kilometer area.
69. On or about October 25, 1999, defendant AMHAZ telephoned defendant DBOUK and discussed defendant LAQIS' request for global positioning devices, binoculars, and 50 metal detectors, and how those items could be delivered to Lebanon so as to avoid detection by Lebanese customs officials.
70. On or about October 27, 1999, defendant DBOUK telephoned defendant AMHAZ and discussed the purchase of an advanced aircraft analysis computer software program and several GPS units.
71. On or about October 27, 1999, defendant AMHAZ telephoned another individual and discussed defendant DBOUK's desire that they purchase binoculars, surveying equipment, and sensors.

**COUNTS SEVENTY-THREE THROUGH SEVENTY-SEVEN**

**PROVIDING MATERIAL SUPPORT OR RESOURCES  
TO A DESIGNATED FOREIGN TERRORIST ORGANIZATION**

1. The Grand Jury re-alleges and incorporates the allegations in Paragraph 1 of Count 72 as though fully set forth herein.

**Superseding Bill of Indictment**  
*USA v. Mohamad Youssef Hammoud, et al*  
3:00CR147-Mu  
Page 51 of 56

2. On or about the dates set forth below, in the Western District of North Carolina and elsewhere, the defendant,

**SAID MOHAMAD HARB**  
a/k/a Mustapha Harb  
a/k/a Ahmed Al Alqam  
a/k/a Ahmed Am  
a/k/a Mohamad Dbouk

a resident of Charlotte, North Carolina, did knowingly provide and attempt to provide material support or resources to Hizballah, a designated foreign terrorist organization, by engaging in the activities set forth below for Mohamad Hassan Dbouk, who the defendant knew to be an agent of Hizballah, for Dbouk and others' use on behalf of Hizballah, as follows:

COUNT	DATE	ACTIVITIES
73	On or about 03/01/1999	Wire transferred \$4,000 to Bank of Nova Scotia account
74	06/10/1999	Obtained False Identification in the name of Hohamad Hassan Dbouk
75	06/15/1999	Established a checking account with a line of credit account at Wachovia Bank (Charlotte, NC) by purchasing a \$1,000 certificate of deposit in the name of Hohamad Hassan Dbouk
76	March 2000	Obtained Centura Bank MasterCard in the name of Hohamad H. Dbouk
77	May 2000	Obtained Provident Bank Visa card in the name of Hohamad H. Dbouk

All in violation of Title 18, United States Code, Section 2339B.

**NOTICE OF FORFEITURE**

Notice is hereby given that:

- (a) all property involved in money laundering conspiracy alleged in this Bill of Indictment, including but not limited to all real and personal property listed below;

- (b) all property which constitutes proceeds of such violations, including but not limited to all real and personal property listed below; and
- (c) in the event that any property described in (a) or (b) above cannot be located or recovered, all other property of the defendants, to the extent of the value of the property described in (a) or (b),

is subject to forfeiture to the United States pursuant to the provisions of 18 U.S.C. § 982.

**REAL PROPERTY AND BUSINESSES**

1. BP Gas Station d/b/a M and A Oil, Inc., located at Exit 60 I 85, the assets, inventory, and accounts used by this business entity, including the real estate where it is located, Lot Number two (2) of Copperfield, Northeast, a map of which is recorded in Map Book 35; Page 55, Cabarrus County Registry, consisting of 1.2 acres, more or less, and conveyed to M.A. Oil, Inc. at 5425 Donnefield Dr. Charlotte, NC 28227 by deed recorded on February 3, 2000 at Book 2782, Page 328 Cabarrus County Registry.
2. 5425 Donnefield Drive, Charlotte, NC 28227, the residence of Mohammad Youssef Hammoud, Ali Hussein Darwiche, Mohamad Atef Darwiche, and Angela Tsioumas, more particularly described in a deed to Angela Georgia Tsioumas, dated 2/27/98, and recorded at Book 9522, Page 339, Mecklenburg County Registry.
3. 8521 Mineral Ridge Way, Charlotte, NC 28269, as described in a deed to Ali F. Darwiche recorded May 29, 1998 at Book 9704, Page 387, Mecklenburg County Registry. The residence of Ali Fayed Darwich.
4. 7341 and 7343 Kentucky Avenue, Dearborn, MI, described as Lot 88, J.C. McDonald's Home Subdivision, as recorded in Liber 42, Page 91 of Plats, and as further described in a Deed to Mohamad R. Chahrour dated September 21, 1990, and recorded at Liber 24839, Page 739, in the Wayne County Records.
5. 15500 West Chicago, Dearborn, MI, described as the East 15 feet of Lot 45, all of Lot 46 and 47, except the part taken, used or deeded for road purposes of Frischkom's Dynamic Subdivision, being part of the Northeast 1/4 of Section 36, Town 1 South, Range 10 East Redford Township, Wayne County, Michigan City of Detroit, as recorded in Liber 48, Page 66, described as: Beginning at the intersection of the North line of West Chicago Boulevard 66 feet wide and the West Line of Greenfield Road 106.00 feet wide and proceeding thence along the North line of West Chicago Boulevard North 89 degrees 48 minutes 40 seconds West 118.00 feet; thence due North 110.00 feet; thence South 89 degrees 48 minutes 40 seconds East 118.00 feet; thence along the West line of Greenfield

Road due South 110.00 feet to the point of beginning. Commonly known as: 15500 West Chicago (Ward 22 Item #:4508-10).

6. 13600 Eight Mile, Oak Park, MI described as Section 31, Assessor's Eight Mile Superhighway Sub. No. 1 South, one-half of Lot 104 and all of Lots 105 to 108 inclusive, Parcel Identifier 52 25-31-483-018.

#### CURRENCY

All currency and monetary instruments involved in, the proceeds of, or which facilitated the money laundering conspiracy or acts in furtherance thereof.

#### VEHICLES

1. 1998 Black Lincoln, Navigator, NC License Plate MXW-4081, VIN 5LMFU28L7WLJ04266, owned and driven by SAID MOHAMAD HARB, but registered to Mohit Behl who is a nominee.
2. 1999 Lexus, NC License Plate ALIC01, VIN JT6HT00W9X0025091, titled in the name of Ali Darwich, owned and operated by ALI FAYEZ DARWICHE.

#### FINANCIAL ACCOUNTS

1. All funds in accounts in the name or control of MOHAMAD YOUSSEF HAMMOUD, SSN 237-75-3540, a/k/a Ali A. A. Albousaleh, SSN 246-81-0641, or one of his aliases, including the following:
  - a. First Union checking account number 1000000789647.
  - b. First Union savings account number 3000000948745.
  - c. Huntington Bank of Michigan checking account number 4242015032.
  - d. First Union checking account number 10000004574654.
  - e. Centura Bank checking account number 300-303-031-3.
  - f. Huntington Bank of Michigan checking account number 2010727460.
2. All funds in accounts in the name or control of ANGELA GEORGIA TSIOMAS or one of her aliases, including the following:

- a. Centura Bank checking account number 300-303-814-7.
- b. Centura Bank money market account number 300-305-432-3.
3. All funds in accounts in the name or control of SAID MOHAMAD HARB or one of his aliases, including the following:
  - a. NationsBank checking account number 651571879.
4. All funds in accounts in the name or control of CHAWKI YOUSSEF HAMMOUD and Dalida Darwiche or one of their aliases, including the following:
  - a. BB&T checking account number 5212566383.
  - b. Centura checking account number 300-303-868-1.
  - c. Centura savings account number 300-901-696-9.
5. All funds in accounts in the name or control of BASSAM YOUSSEF HAMOOD or one of his aliases, including the following:
  - a. Wachovia checking account number 31869-225180 and saving account number 1869776488.
6. All funds in accounts in the name or control of MOHAMAD ATEF DARWICHE or one of his aliases, including the following:
  - a. First Union checking number 3140160.
7. All funds in accounts in the name or control of ALI FAYEZ DARWICHE or one of his aliases, including the following:
  - a. First Union checking account, number 2000000642262 (in the name of Alico Painting).
  - b. First Union checking account number 1000000788130 and savings account, number 3000000223923.
  - c. Centura Bank checking account number 300-305-306-4.

**Superseding Bill of Indictment**  
*USA v. Mohamad Youssef Hammoud, et al*  
3:00CR147-Mu  
Page 55 of 56

- d. Centura Bank checking account number 3000004005 (in the name of Alico Painting).
  - e. First Union checking account number 1000000788156 and savings account number 3000000948554.
8. All funds in the following accounts:
- a. Account number 300-303-031-3 at Centura Bank in the name of Ali A. A. Abousaleh.
  - b. Centra Bank account number 3000010827 in the name of Cedarland Palace.
  - c. Account number 0005402328 at First Charter National Bank in the name of M&A Oil Inc.
  - d. Bank of America account number 000682137870 in the name of Ahmed A. Darwiche.
  - e. Account number 001115189 at First Charter National Bank in the name of Sorben Inc. d/b/a Cedarland.
  - f. First Union National Bank account number 1010016570791 in the name of Pierrot N. Sammour.
  - g. Centura Bank account 300-309-105-6, jointly in the name of Mohamad Hammoud and Naame Ahmad Darwiche.
  - h. Account number 300-305-935-1 at Centura Bank in the name of Mohamad Atef Darwiche and Mary Denise Covington.
  - i. ETrade Security Account number 10100069546102196464756441 in the name of Ali Fayez Darwiche.
  - j. Account numbers 540105258, 1000004677768, 2000001086830, and 21000000955409 at First Union National Bank, all in the name of some combination of Ali Fayez Darwiche and/or his business, Alico Painting Co.