

SUPREME COURT OF THE STATE OF NEW YORK
KINGS COUNTY: CRIMINAL TERM

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THE PEOPLE OF THE STATE OF NEW YORK

-against-

IND. NO. 3592/2013

BASEL RAMADAN, A.K.A. ABU SALAH
SAMER RAMADAN, A.K.A. ABU MAHDY
ADELA BUZAHRIEH, A.K.A. ADEL ABU ZAHRIEH
YOUSSEFF ODEH, A.K.A. ABU MAHMOUD
ISSA SULIEMAN
MUFEED ATTAL, A.K.A. ABU SALEEM
IZZAT NIMER, A.K.A. NIMER IZZAT, A.K.A. ABU ALI
MUNTHER MAHMOUD
NABIEL SAAD BADR, A.K.A. ABU NABIL
AHMAD ABDELAZIZ, A.K.A. AL JABA'I
RIBHI AWAWDEH
MOHAMED ABED ALABED AWAWDEH, A.K.A. ABU SAMIR
BASSAM TWAM
MURAD BISHRAT
MOHANNAD SEIF
MUAFFAQ ASKAR

DEFENDANTS.

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COUNT ONE

ENTERPRISE CORRUPTION

THE GRAND JURY OF KINGS COUNTY, by this Indictment, accuses the defendants of the crime of ENTERPRISE CORRUPTION, in violation of Penal Law Section 460.20(1)(a), committed in Kings County and elsewhere as follows:

The defendants, from on or about December 2008, to on or about May 10, 2013, having knowledge of the existence of a Criminal Enterprise, to wit: the RAMADAN Untaxed Cigarette Distribution based Money Laundering Enterprise, and the nature of its

activities, and being members of or associated with that criminal enterprise by participating in a pattern of criminal activity, as follows:

THE CRIMINAL ENTERPRISE

At all times relevant to the First Count:

The defendants **Basel Ramadan, a.k.a. Abu Salah, Samir Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Issa Sulieman, Mufeed Attal, a.k.a. Abu Saleem, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali, Munther Mahmoud, Nabil Saad Badr, a.k.a. Abu Nabil, Ahmad Abdelaziz, a.k.a. Al Jaba'I, Ribhi Awawdeh, Mohamed Abed Alabed Awawdeh, a.k.a. Abu Samir, Bassam Twam, Murad Bishrat, Mohannad Seif, Muaffaq Askar**, along with other persons known and unknown, were members and/or associates of an enterprise called herein the RAMADAN Untaxed Cigarette Distribution based Money Laundering Enterprise which consisted of a group of persons sharing a common purpose of engaging in criminal conduct. The RAMADAN Untaxed Cigarette Distribution based Money Laundering Enterprise had an ascertainable structure that was distinct from a pattern of criminal activity, and had a continuity of existence, structure and criminal purpose beyond the scope of individual criminal incidents.

The defendants listed above were members and associates of the RAMADAN Untaxed Cigarette Distribution based Money Laundering Enterprise - an organized criminal group which operated an untaxed cigarette trafficking based money laundering operation in Kings, Bronx and Albany Counties, New York, New Jersey, Delaware, and Maryland, and elsewhere inside and outside of the United States of America. The

RAMADAN Untaxed Cigarette Distribution based Money Laundering Enterprise constituted a “criminal enterprise” as that term is defined in Penal Law § 460.10 (3).

The defendant **Basel Ramadan, a.k.a. Abu Salah** was “Boss” of the enterprise, and the defendants **Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Issa Sulieman, Mufeed Attal, a.k.a. Abu Saleem, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali, Munther Mahmoud, Nabil Saad Badr, a.k.a. Abu Nabil, Ahmad Abdelaziz, a.k.a. Al Jaba’I, Ribhi Awawdeh, Mohamed Abed Alabed Awawdeh, a.k.a. Abu Samir, Bassam Twam, Murad Bishrat, Mohannad Seif, Muaffaq Askar** were “employees” and “associates” of **Basel Ramadan, a.k.a. Abu Salah** and of the RAMADAN Untaxed Cigarette Distribution based Money Laundering Enterprise.

THE STRUCTURE AND PURPOSES OF THE CRIMINAL ENTERPRISE

The Criminal Enterprise consisted of a BOSS, **Basel Ramadan** (a.k.a. Abu Salah, hereinafter "**Ramadan**"), who headed the illicit untaxed cigarette distribution based money laundering operation by acquiring cigarettes for distribution throughout New York State, storing those cigarettes in Delaware, and by controlling the distribution of cigarettes to the New York City area without paying New York State tobacco taxes thereby generating millions of dollars in illicit proceeds for himself and other members of the enterprise; his TREASURER (and right hand) and younger brother **Samer Ramadan**, who assisted Ramadan in all aspects of the operation, but focused on control and disbursement of the cash generated by the enterprise; several NEW YORK BASED DISTRIBUTORS; **Youssef Odeh**, a.k.a. Abu Mahmoud (hereinafter "**Odeh**"), **Issa Sullieman** (hereinafter "**Issa**"); **Ribhi Awawdeh** (hereinafter "**Ribhi**"), **Mohamed**

Abed Alabed Awawdeh, a.k.a. Abu Samir (hereinafter “**Mohamed Abed**”)(collectively referred to as “the Dibwani” or “The Bronx Guys”); **Ahmad Abdelaziz**, a.k.a. Al Jaba'I (hereinafter “**Abdelaziz**”); **Mufeed Attal**, a.k.a. Abu Saleem (hereinafter “**Attal**”); **Nimer Izzat**, a.k.a. Izzat Nimer, a.k.a., Abu Ali (hereinafter “**Nimer**”); **Munther Mahmoud** (hereinafter “**Munther**”) and **Saad Badr Nabil**, a.k.a. Abu Nabil (hereinafter “**Nabil**”), all of whom purchased untaxed cigarettes from Ramadan using the proceeds that they generated from a prior sale of contraband cigarettes, and then distributed them within New York City (predominantly in Brooklyn) to NEW YORK BASED RESELLERS; **Bassam Twam** (hereinafter “**Bassam**”), **Mohannad Seif** (hereinafter “**Seif**”), **Murad Bishrat** (hereinafter “**Murad**”), **Muaffaq Askar** (hereinafter “**Askar**”), who sold the contraband cigarettes to local cigarette retailers; and a TRANSPORTER, **Adel Abuzarieh** (hereinafter “**Adel**”), regularly transported large amounts of the cash proceeds generated from the cigarette sales, sometimes over \$100,000 per trip, from New York based distributors back to Ramadan in order to replenish the cigarette supply, and transported the contraband cigarettes from Ramadan's Delaware storage facilities back down to the New York based distributors for sale.

Ramadan and Samer Ramadan, purchased cigarettes from at least one wholesaler, Cooper Booth Wholesale, Inc., using their Virginia businesses as fronts to appear as though they were purchasing cigarettes for sale in Virginia, thereby paying only the low Virginia cigarette tax, and thereafter controlled the distribution of the cigarettes (approximately 20,000 cartons per week) to New York City area without anyone associated with the enterprise paying New York State tobacco taxes for those cigarettes. Specifically, Ramadan determined the New York based distributors to whom he would

sell cigarettes, the prices the distributors had to pay for cigarettes and the times and locations at which the distributors would exchange money for cigarettes. Ramadan dictated that one of the central locations was the operation's storage facility located in Dagsboro, Delaware. Additionally, Ramadan determined which distributors would use Adel to transport the money to and cigarettes from the Ramadans. Ramadan also mandated that the distributors that employ Adel's services pay Adel a fee of approximately \$0.75 per carton of cigarettes that he transported. On average, the distributors purchased two to four thousand cartons of cigarettes per week (400,000 to 800,000 cigarettes) at a value of between \$100,000 and \$200,000. Ramadan accepted the payment for the merchandise distributed in cash, which was generated from the sale of the previously delivered cigarettes, and kept a running tally of how much each distributor owed them. Ramadan determined how much "credit" each distributor was permitted before he required payment. The distributors were paying Ramadan and Samer Ramadan for merchandise that they had already received using the proceeds from sale of the untaxed cigarettes. With each transaction, the re-sellers collected money from the retailers, and then the re-sellers provided that cash to the distributors who either transported it themselves to the Ramadans in Delaware in exchange for their fresh supply of contraband cigarettes, or provided it to Adel for transport to the Ramadans, and then Adel would transport the fresh supply of cigarettes back to the New York based Distributers. In both scenarios, a percentage of the profits from the sale of the untaxed cigarettes is being infused back into the RAMADAN Untaxed Cigarette Distribution based Money Laundering Enterprise.

Once the distributors take possession of the merchandise, they distribute it to the resellers, who in turn sell the untaxed cigarettes to a myriad of bodegas and grocery stores throughout Brooklyn, Queens, Bronx and Staten Island. One of the resellers, Mohannad Seif, also resells the untaxed cigarettes to various grocery stores in Capital District - Albany and Schenectady Counties.

Ramadan and Samer Ramadan also furthered the untaxed cigarette distribution business by concealing and disguising the true nature of the illicit proceeds of that business by depositing a portion of the proceeds that the distributors used to pay for the cigarettes into small local financial institutions in the Ocean City, Maryland area, and used that money to purchase additional cigarettes for sale from Cooper Booth.

None of the members of the RAMADAN Untaxed Cigarette Distribution based Money Laundering Enterprise are licensed or registered New York State Cigarette Stamping Agents or Wholesale Dealers of Cigarettes.

PATTERN OF CRIMINAL ACTIVITY

During the period of this offense, the defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Issa Sulieman, Mufeed Attal, a.k.a. Abu Saleem, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali, Munther Mahmoud, Nabil Saad Badr, a.k.a. Abu Nabil, Ahmad Abdelaziz, a.k.a. Al Jaba'I, Ribhi Awawdeh, Mohamed Abed Alabed Awawdeh, a.k.a. Abu Samir, Bassam Twam, Murad Bishrat, Mohannad Seif, Muaffaq Askar, with intent to participate in and advance the affairs of the criminal

enterprise and pursuant to a common scheme and plan, engaged in conduct constituting or was criminally liable for the following criminal acts included within a pattern of criminal activity:

PATTERN ACT #1

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Issa Sulieman, Ahmad Abdelaziz, a.k.a. Al Jaba'I, Ribhi Awawdeh and Mohamed Abed Alabed Awawdeh, a.k.a. Abu Samir, each aiding the other and acting in concert, committed the crime of **Attempt to Evade or Defeat Cigarette and Tobacco Products Tax** in violation of N.Y. Tax L. §§ 481(2)(a) & 4 and N.Y. Tax L. § 1814(a)(i), in that on or about and between January 31, 2013 and February 2, 2013, in the County of Kings, County of Bronx and elsewhere in the State, and in the States of Delaware, Maryland and New Jersey, they did willfully attempt in any manner to evade or defeat the taxes imposed pursuant to New York State Tax Law or payment thereof on ten thousand (10,000) or more cigarettes.

PATTERN ACT #2

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Issa Sulieman, Ahmad Abdelaziz, a.k.a. Al Jaba'I, Ribhi Awawdeh and Mohamed Abed Alabed Awawdeh, a.k.a. Abu Samir, each aiding the other and acting in concert, committed the crime of **Possession or Transport for the Purpose of Sale, or Sale or Offering For Sale, of Thirty Thousand or More Cigarettes in Unstamped or Unlawfully Stamped Packages** in violation of N.Y. Tax L. §§ 481(2)(a) & 4 and N.Y.

Tax L. § 1814(c)(2), in that on or about and between January 31, 2013 and February 2, 2013, in the County of Kings, County of Bronx and elsewhere in the State, and in the States of Delaware, Maryland and New Jersey, not being agents licensed by the Commissioner of the New York State Department of Taxation and Finance, did willfully possess or transport for the purpose of sale thirty thousand or more cigarettes subject to the tax imposed pursuant to New York State Law in any unstamped or unlawfully stamped packages, and/or willfully sold or offered for sale thirty thousand or more cigarettes in any unstamped or unlawfully stamped packages.

PATTERN ACT #3

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Issa Sulieman, Ahmad Abdelaziz, a.k.a. Al Jaba'I, Ribhi Awawdeh and Mohamed Abed Alabed Awawdeh, a.k.a. Abu Samir, each aiding the other and acting in concert, committed the crime of **Money Laundering in the Third Degree** in violation of **Penal Law § 470.10(2)(b)(i)**, in that on or about and between January 31, 2013 and February 2, 2013, in the County of Kings, County of Bronx, and elsewhere in the State of New York and in the States of Delaware, Maryland and New Jersey, knowing that one or more monetary instruments, to wit, United States currency, represented the proceeds of criminal conduct, the defendants transported, transmitted, or transferred, or attempted to transport, transmit or transfer, on one or more occasions, monetary instruments which in fact represented the proceeds of specified criminal conduct, to wit, violation of N.Y. Tax L. §§ 481(2)(a) & 4, N.Y. Tax L. §§ 1814(a)(i) and (c)(2) and Enterprise Corruption, from a place in any county in this state to or through a place outside that county or to a

place in any county in this state from or through a place outside that county, with intent to promote the carrying on of criminal conduct, and the total value of such monetary instrument or instruments exceeded fifty thousand dollars.

PATTERN ACT #4

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Issa Sulieman, Ahmad Abdelaziz, a.k.a. Al Jaba'I, Ribhi Awawdeh and Mohamed Abed Alabed Awawdeh, a.k.a. Abu Samir, each aiding the other and acting in concert, committed the crime of **Money Laundering in the Third Degree** in violation of **Penal Law § 470.10(1)(b)(i)(A)**, in that on or about and between January 31, 2013 and February 2, 2013, in the County of Kings, County of Bronx, and elsewhere in the State of New York and in the States of Delaware, Maryland and New Jersey, knowing that the property involved in one or more financial transactions, to wit, United States currency, represented the proceeds of criminal conduct, the defendants conducted one or more such financial transactions which in fact involved the proceeds of specified criminal conduct, to wit, violation of N.Y. Tax L. §§ 481(2)(a) & 4, N.Y. Tax L. §§ 1814(a)(i) and (c)(2) and Enterprise Corruption, with intent to promote the carrying on of criminal conduct, and the total value involved in such financial transaction or transactions exceeded fifty thousand dollars.

PATTERN ACT #5

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Issa Sulieman, Bassam Twam, Ahmad Abdelaziz, a.k.a. Al Jaba'I, Ribhi

Awawdeh, Mohamed Abed Alabed Awawdeh, a.k.a. Abu Samir and Muaffaq Askar, each aiding the other and acting in concert, committed the crime of **Attempt to Evade or Defeat Cigarette and Tobacco Products Tax** in violation of **N.Y. Tax L. §§ 481(2)(a) & 4 and N.Y. Tax L. § 1814(a)(i)**, in that on or about and between March 12, 2013 and March 14, 2013, in the County of Kings, County of Bronx, and elsewhere in the State of New York and in the States of Delaware, Maryland and New Jersey, did willfully attempt in any manner to evade or defeat the taxes imposed pursuant to New York State Tax Law or payment thereof on ten thousand or more cigarettes.

PATTERN ACT #6

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Issa Sulieman, Bassam Twam, Ahmad Abdelaziz, a.k.a. Al Jaba'I, Ribhi Awawdeh, Mohamed Abed Alabed Awawdeh, a.k.a. Abu Samir and Muaffaq Askar, each aiding the other and acting in concert, committed the crime of **Possession or Transport for the Purpose of Sale, or Sale or Offering For Sale, of Thirty Thousand or More Cigarettes in Unstamped or Unlawfully Stamped Packages** in violation of **N.Y. Tax L. §§ 481(2)(a) & 4 and N.Y. Tax L. § 1814(c)(2)**, in that on or about and between March 12, 2013 and March 14, 2013, in the County of Kings, County of Bronx, and elsewhere in the State of New York and in the States of Delaware, Maryland and New Jersey, not being agents licensed by the Commissioner of the New York State Department of Taxation and Finance, did willfully possess or transport for the purpose of sale, thirty thousand or more cigarettes subject to the tax imposed pursuant to New York State Law in any unstamped or unlawfully stamped packages, and/or willfully sold or

offered for sale thirty thousand or more cigarettes in any unstamped or unlawfully stamped packages.

PATTERN ACT #7

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Issa Sulieman, Bassam Twam, Ahmad Abdelaziz, a.k.a. Al Jaba'I, Ribhi Awawdeh, Mohamed Abed Alabed Awawdeh, a.k.a. Abu Samir and Muaffaq Askar, each aiding the other and acting in concert, committed the crime of **Money Laundering in the Third Degree** in violation of **Penal Law § 470.10(2)(b)(i)**, in that on or about and between March 12, 2013 and March 14, 2013, in the County of Kings, County of Bronx, and elsewhere in the State of New York and in the States of Delaware, Maryland and New Jersey, knowing that one or more monetary instruments, to wit, United States currency, represented the proceeds of criminal conduct, the defendants transported, transmitted, or transferred, or attempted to transport, transmit or transfer, on one or more occasions, monetary instruments which in fact represented the proceeds of specified criminal conduct, to wit, violation of N.Y. Tax L. §§ 481(2)(a) & 4, N.Y. Tax L. §§ 1814(a)(i) and (c)(2) and Enterprise Corruption, from a place in any county in this state to or through a place outside that county or to a place in any county in this state from or through a place outside that county, with intent to promote the carrying on of criminal conduct, and the total value of such monetary instrument or instruments exceeded fifty thousand dollars.

PATTERN ACT #8

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Issa Sulieman, Bassam Twam, Ahmad Abdelaziz, a.k.a. Al Jaba'I, Ribhi Awawdeh, Mohamed Abed Alabed Awawdeh, a.k.a. Abu Samir and Muaffaq Askar, each aiding the other and acting in concert, committed the crime of **Money Laundering in the Third Degree** in violation of **Penal Law § 470.10(1)(b)(i)(A)**, in that on or about and between March 12, 2013 and March 14, 2013, in the County of Kings, County of Bronx, and elsewhere in the State of New York and in the States of Delaware, Maryland and New Jersey, knowing that the property involved in one or more financial transactions, to wit, United States currency, represented the proceeds of criminal conduct, the defendants conducted one or more such financial transactions which in fact involved the proceeds of specified criminal conduct, to wit, violation of N.Y. Tax L. §§ 481(2)(a) & 4, N.Y. Tax L. §§ 1814(a)(i) and (c)(2) and Enterprise Corruption, with intent to promote the carrying on of criminal conduct, and the total value involved in such financial transaction or transactions exceeded fifty thousand dollars.

PATTERN ACT #9

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu Saleem, each aiding the other and acting in concert, committed the crime of **Attempt to Evade or Defeat Cigarette and Tobacco Products Tax** in violation of **N.Y. Tax L. §§ 481(2)(a) & 4 and N.Y. Tax L. § 1814(a)(i)**, in that on or about March 11, 2013, in the County of Kings, and elsewhere in the State of New York and in the States of Delaware

and Maryland, did willfully attempt in any manner to evade or defeat the taxes imposed pursuant to New York State Tax Law or payment thereof on ten thousand or more cigarettes.

PATTERN ACT #10

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu Saleem, each aiding the other and acting in concert, committed the crime of **Possession or Transport for the Purpose of Sale, or Sale or Offering For Sale, of Thirty Thousand or More Cigarettes in Unstamped or Unlawfully Stamped Packages** in violation of **N.Y. Tax L. §§ 481(2)(a) & 4 and N.Y. Tax L. § 1814(c)(2)**, in that on or about March 11, 2013, in the County of Kings and elsewhere in the State of New York and in the States of Delaware and Maryland, not being agents licensed by the Commissioner of the New York State Department of Taxation and Finance, did willfully possess or transport for the purpose of sale, thirty thousand or more cigarettes subject to the tax imposed pursuant to New York State Law in any unstamped or unlawfully stamped packages, and/or willfully sold or offered for sale thirty thousand or more cigarettes in any unstamped or unlawfully stamped packages.

PATTERN ACT #11

Defendants, Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu Saleem, each aiding the other and acting in concert, committed the crime of **Money Laundering in the Fourth Degree** in violation of **Penal Law § 470.05(2)(a)(i)**, in that on or about March 11, 2013, in the County of Kings and elsewhere in the State of New

York and in the States of Delaware and Maryland, knowing that one or more monetary instruments, to wit, United States currency, represented the proceeds of criminal conduct, the defendants transported, transmitted, or transferred, on one or more occasions, monetary instruments which in fact represented the proceeds of specified criminal conduct, to wit, violation of N.Y. Tax L. §§ 481(2)(a) & 4, N.Y. Tax L. §§ 1814(a)(i) and (c)(2) and Enterprise Corruption, with intent to promote the carrying on of criminal conduct, and the total value of such monetary instrument or instruments exceeded ten thousand dollars.

PATTERN ACT #12

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu Saleem, each aiding the other and acting in concert, committed the crime of **Money Laundering in the Fourth Degree** in violation of **Penal Law § 470.05(1)(a)(i)(A)**, in that on or about March 11, 2013, in the County of Kings and elsewhere in the State of New York and in the States of Delaware and Maryland, knowing that the property, to wit, United States Currency, involved in one or more financial transactions represented the proceeds of criminal conduct, the defendants conducted one or more such financial transactions which in fact involved the proceeds of specified criminal conduct, to wit, violation of N.Y. Tax L. §§ 481(2)(a) & 4, N.Y. Tax L. §§ 1814(a)(i) and (c)(2) and Enterprise Corruption, with intent to promote the carrying on of criminal conduct, and the total value involved in such financial transaction or transactions exceeded five thousand dollars.

PATTERN ACT #13

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu Saleem, each aiding the other and acting in concert, committed the crime of **Attempt to Evade or Defeat Cigarette and Tobacco Products Tax** in violation of **N.Y. Tax L. §§ 481(2)(a) & 4 and N.Y. Tax L. § 1814(a)(i)**, in that on or about March 3, 2013, in the County of Kings and elsewhere within the State of New York, and in the States of Delaware and Maryland, did willfully attempt in any manner to evade or defeat the taxes imposed pursuant to New York State Tax Law or payment thereof on ten thousand or more cigarettes.

PATTERN ACT #14

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu Saleem, each aiding the other and acting in concert, committed the crime of **Possession or Transport for the Purpose of Sale, or Sale or Offering For Sale, of Thirty Thousand or More Cigarettes in Unstamped or Unlawfully Stamped Packages** in violation of **N.Y. Tax L. §§ 481(2)(a) & 4 and N.Y. Tax L. § 1814(c)(2)**, in that on or about March 3, 2013, in the County of Kings and elsewhere in the State of New York, and in the States of Delaware and Maryland, not being agents licensed by the Commissioner of the New York State Department of Taxation and Finance, did willfully possess or transport for the purpose of sale, thirty thousand or more cigarettes subject to the tax imposed pursuant to New York State Law in any unstamped or unlawfully

stamped packages, and/or willfully sold or offered for sale thirty thousand or more cigarettes in any unstamped or unlawfully stamped packages.

PATTERN ACT #15

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu Saleem, each aiding the other and acting in concert, committed the crime of **Money Laundering in the Third Degree** in violation of **Penal Law § 470.10(2)(b)(i)**, in that on or about March 3, 2013, in the County of Kings and elsewhere within the State of New York, and in the States of Delaware and Maryland, knowing that one or more monetary instruments, to wit, United States currency, represented the proceeds of criminal conduct, the defendants transported, transmitted, or transferred, or attempted to transport, transmit or transfer, on one or more occasions, monetary instruments which in fact represented the proceeds of specified criminal conduct, to wit, violation of N.Y. Tax L. §§ 481(2)(a) & 4, N.Y. Tax L. §§ 1814(a)(i) and (c)(2) and Enterprise Corruption, from a place in any county in this state to or through a place outside that county or to a place in any county in this state from or through a place outside that county, with intent to promote the carrying on of criminal conduct, and the total value of such monetary instrument or instruments exceeded fifty thousand dollars.

PATTERN ACT #16

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu Saleem, each aiding the other and acting in concert, committed the crime of **Money Laundering in the Third Degree** in violation of **Penal Law § 470.10(1)(b)(i)(A)**, in

that on or about March 3, 2013, in the County of Kings and elsewhere in the State of New York, and in the States of Delaware and Maryland, knowing that the property, to wit, United States currency, involved in one or more financial transactions represented the proceeds of criminal conduct, the defendants conducted one or more such financial transactions which in fact involved the proceeds of specified criminal conduct, to wit, violation of N.Y. Tax L. §§ 481(2)(a) & 4, N.Y. Tax L. §§ 1814(a)(i) and (c)(2) and Enterprise Corruption, as that term is defined under Article 470 of the Penal Law, with intent to promote the carrying on of criminal conduct, and the total value involved in such financial transaction or transactions exceeded fifty thousand dollars.

PATTERN ACT #17

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu Saleem, each aiding the other and acting in concert, committed the crime of **Attempt to Evade or Defeat Cigarette and Tobacco Products Tax** in violation of **N.Y. Tax L. §§ 481(2)(a) & 4 and N.Y. Tax L. § 1814(a)(i)**, in that on or about March 12, 2013, in the County of Kings and elsewhere in the State of New York, and in the States of Delaware and Maryland, did willfully attempt in any manner to evade or defeat the taxes imposed pursuant to New York State Tax Law or payment thereof on ten thousand or more cigarettes.

PATTERN ACT #18

Defendants, Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu Saleem, each aiding the other and acting in concert, committed the crime of **Possession**

or Transport for the Purpose of Sale, or Sale or Offering For Sale, of Thirty Thousand or More Cigarettes in Unstamped or Unlawfully Stamped Packages in violation of **N.Y. Tax L. §§ 481(2)(a) & 4 and N.Y. Tax L. § 1814(c)(2)**, in that on or about March 12, 2013, in the County of Kings and elsewhere in the State of New York, and in the States of Delaware and Maryland, not being agents licensed by the Commissioner of the New York State Department of Taxation and Finance, did willfully possess or transport for the purpose of sale, thirty thousand or more cigarettes subject to the tax imposed pursuant to New York State Law in any unstamped or unlawfully stamped packages, and/or willfully sold or offered for sale thirty thousand or more cigarettes in any unstamped or unlawfully stamped packages.

PATTERN ACT #19

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu Saleem, each aiding the other and acting in concert, committed the crime of **Money Laundering in the Third Degree** in violation of **Penal Law § 470.10(2)(b)(i)**, in that on or about Mach 12, 2013, in the County of Kings and elsewhere in the State of New York, and in the States of Delaware and Maryland, knowing that one or more monetary instruments, to wit, United States currency, represented the proceeds of criminal conduct, the defendants transported, transmitted, or transferred, or attempted to transport, transmit or transfer, on one or more occasions, monetary instruments which in fact represented the proceeds of specified criminal conduct, to wit, violation of N.Y. Tax L. §§ 481(2)(a) & 4, N.Y. Tax L. §§ 1814(a)(i) and (c)(2) and Enterprise Corruption, from a place in any county in this state to or through a place outside that county or to a place in any county in

this state from or through a place outside that county, with intent to promote the carrying on of criminal conduct, and the total value of such monetary instrument or instruments exceeded fifty thousand dollars.

PATTERN ACT #20

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu Saleem, each aiding the other and acting in concert, committed the crime of **Money Laundering in the Third Degree** in violation of **Penal Law § 470.10(1)(b)(i)(A)**, in that on or about March 12, 2013, in the County of Kings and elsewhere within the State of New York, and within the States of Delaware and Maryland, knowing that the property, to wit, United States currency, involved in one or more financial transactions represented the proceeds of criminal conduct, the defendants conducted one or more such financial transactions which in fact involved the proceeds of specified criminal conduct, to wit, violation of N.Y. Tax L. §§ 481(2)(a) & 4, N.Y. Tax L. §§ 1814(a)(i) and (c)(2) and Enterprise Corruption, with intent to promote the carrying on of criminal conduct, and the total value involved in such financial transaction or transactions exceeded fifty thousand dollars.

PATTERN ACT #21

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Issa Sulieman, Bassam Twam, Ribhi Awawdeh and Mohamed Abed Alabed Awawdeh, a.k.a. Abu Samir, each aiding the other and acting in concert, committed the crime of **Attempt to Evade or Defeat Cigarette and Tobacco Products**

Tax in violation of **N.Y. Tax L. §§ 481(2)(a) & 4** and **N.Y. Tax L. § 1814(a)(i)**, in that on or about March 27, 2013, in the County of Kings and County of Bronx and elsewhere within the State of New York, and within the States of Delaware, Maryland and New Jersey, did willfully attempt in any manner to evade or defeat the taxes imposed pursuant to New York State Tax Law or payment thereof on ten thousand or more cigarettes.

PATTERN ACT #22

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Issa Sulieman, Bassam Twam, Ribhi Awawdeh and Mohamed Abed Alabed Awawdeh, a.k.a. Abu Samir, each aiding the other and acting in concert, committed the crime of **Possession or Transport for the Purpose of Sale, or Sale or Offering For Sale, of Thirty Thousand or More Cigarettes in Unstamped or Unlawfully Stamped Packages** in violation of **N.Y. Tax L. §§ 481(2)(a) & 4** and **N.Y. Tax L. § 1814(c)(2)**, in that on or about March 27, 2013, in the County of Kings, County of Bronx and elsewhere within the State of New York, and within the States of Delaware, Maryland and New Jersey, not being agents licensed by the Commissioner of the New York State Department of Taxation and Finance, did willfully possess or transport for the purpose of sale, thirty thousand or more cigarettes subject to the tax imposed pursuant to New York State Law in any unstamped or unlawfully stamped packages, and/or willfully sold or offered for sale thirty thousand or more cigarettes in any unstamped or unlawfully stamped packages.

PATTERN ACT #23

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Issa Sulieman, Bassam Twam, Ribhi Awawdeh and Mohamed Abed Alabed Awawdeh, a.k.a. Abu Samir, each aiding the other and acting in concert, committed the crime of **Money Laundering in the Third Degree** in violation of **Penal Law § 470.10(2)(b)(i)**, in that on or about March 27, 2013, in the County of Kings, County of Bronx, and elsewhere within the State of New York, and within the States of Delaware, Maryland and New Jersey, knowing that one or more monetary instruments, to wit, United States currency, represented the proceeds of criminal conduct, the defendants transported, transmitted, or transferred, or attempted to transport, transmit or transfer, on one or more occasions, monetary instruments which in fact represented the proceeds of specified criminal conduct, to wit, violation of N.Y. Tax L. §§ 481(2)(a) & 4, N.Y. Tax L. §§ 1814(a)(i) and (c)(2) and Enterprise Corruption, from a place in any county in this state to or through a place outside that county or to a place in any county in this state from or through a place outside that county, with intent to promote the carrying on of criminal conduct, and the total value of such monetary instrument or instruments exceeded fifty thousand dollars.

PATTERN ACT #24

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Issa Sulieman, Bassam Twam, Ribhi Awawdeh and Mohamed Abed Alabed Awawdeh, a.k.a. Abu Samir, each aiding the other and acting in concert,

committed the crime of **Money Laundering in the Third Degree** in violation of **Penal Law § 470.10(1)(b)(i)(A)**, in that on or about March 27, 2013, in the County of Kings, County of Bronx and elsewhere within the State of New York, and in the States of Delaware, Maryland and New Jersey, knowing that the property, to wit, United States currency, involved in one or more financial transactions represented the proceeds of criminal conduct, the defendants conducted one or more such financial transactions which in fact involved the proceeds of specified criminal conduct, to wit, violation of N.Y. Tax L. §§ 481(2)(a) & 4, N.Y. Tax L. §§ 1814(a)(i) and (c)(2) and Enterprise Corruption, with intent to promote the carrying on of criminal conduct, and the total value involved in such financial transaction or transactions exceeded fifty thousand dollars.

PATTERN ACT #25

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Issa Sulieman, Bassam Twam, Ahmad Abdelaziz, a.k.a. Al Jaba'I, Ribhi Awawdeh and Mohamed Abed Alabed Awawdeh, a.k.a. Abu Samir, each aiding the other and acting in concert, committed the crime of **Attempt to Evade or Defeat Cigarette and Tobacco Products Tax** in violation of **N.Y. Tax L. §§ 481(2)(a) & 4 and N.Y. Tax L. § 1814(a)(i)**, in that on or about and between March 28, 2013 and March 30, 2013, in the County of Kings, County of Bronx and elsewhere within the State of New York, and in the States of Delaware, Maryland and New Jersey, did willfully attempt in any manner to evade or defeat the taxes imposed pursuant to New York State Tax Law or payment thereof on ten thousand or more cigarettes.

PATTERN ACT #26

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Issa Sulieman, Bassam Twam, Ahmad Abdelaziz, a.k.a. Al Jaba'I, Ribhi Awawdeh and Mohamed Abed Alabed Awawdeh, a.k.a. Abu Samir, each aiding the other and acting in concert, committed the crime of **Possession or Transport for the Purpose of Sale, or Sale or Offering For Sale, of Thirty Thousand or More Cigarettes in Unstamped or Unlawfully Stamped Packages** in violation of N.Y. Tax L. §§ 481(2)(a) & 4 and N.Y. Tax L. § 1814(c)(2), in that on or about and between March 28 and March 30, 2013, in the County of Kings, County of Bronx and elsewhere within the State of New York, and in the States of Delaware, Maryland and New Jersey, not being agents licensed by the Commissioner of the New York State Department of Taxation and Finance, did willfully possess or transport for the purpose of sale, thirty thousand or more cigarettes subject to the tax imposed pursuant to New York State Law in any unstamped or unlawfully stamped packages, and/or willfully sold or offered for sale thirty thousand or more cigarettes in any unstamped or unlawfully stamped packages.

PATTERN ACT #27

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Issa Sulieman, Bassam Twam, Ahmad Abdelaziz, a.k.a. Al Jaba'I, Ribhi Awawdeh and Mohamed Abed Alabed Awawdeh, a.k.a. Abu Samir, each aiding the other and acting in concert, committed the crime of **Money Laundering in the Third**

Degree in violation of **Penal Law § 470.10(2)(b)(i)**, in that on or about and between March 28 and March 30, 2013, in the County of Kings, County of Bronx and elsewhere within the State of New York, and in the States of Delaware, Maryland and New Jersey, knowing that one or more monetary instruments, to wit, United States currency, represented the proceeds of criminal conduct, the defendants transported, transmitted, or transferred, or attempted to transport, transmit or transfer, on one or more occasions, monetary instruments which in fact represented the proceeds of specified criminal conduct, to wit, violation of N.Y. Tax L. §§ 481(2)(a) & 4, N.Y. Tax L. §§ 1814(a)(i) and (c)(2) and Enterprise Corruption, from a place in any county in this state to or through a place outside that county or to a place in any county in this state from or through a place outside that county, with intent to promote the carrying on of criminal conduct, and the total value of such monetary instrument or instruments exceeded fifty thousand dollars.

PATTERN ACT #28

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Issa Sulieman, Bassam Twam, Ahmad Abdelaziz, a.k.a. Al Jaba'I, Ribhi Awawdeh and Mohamed Abed Alabed Awawdeh, a.k.a. Abu Samir, each aiding the other and acting in concert, committed the crime of **Money Laundering in the Third Degree** in violation of **Penal Law § 470.10(1)(b)(i)(A)**, in that on or about and between March 28 and March 30, 2013, in the County of Kings, County of Bronx and elsewhere within the State of New York, and in the States of Delaware, Maryland and New Jersey, knowing that the property, to wit, United States currency, involved in one or more financial transactions represented the proceeds of criminal conduct, the defendants

conducted one or more such financial transactions which in fact involved the proceeds of specified criminal conduct, to wit, violation of N.Y. Tax L. §§ 481(2)(a) & 4, N.Y. Tax L. §§ 1814(a)(i) and (c)(2) and Enterprise Corruption, with intent to promote the carrying on of criminal conduct, and the total value involved in such financial transaction or transactions exceeded fifty thousand dollars.

PATTERN ACT #29

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Munther Mahmoud, Bassam Twam, Murad Bishrat and Mohannad Seif, each aiding the other and acting in concert, committed the crime of **Attempt to Evade or Defeat Cigarette and Tobacco Products Tax** in violation of **N.Y. Tax L. §§ 481(2)(a) & 4 and N.Y. Tax L. § 1814(a)(i)**, in that on or about and between October 21, 2012 and October 28, 2012, in the County of Kings and elsewhere within the State of New York, and in the States of Delaware and Maryland, did willfully attempt in any manner to evade or defeat the taxes imposed pursuant to New York State Tax Law or payment thereof on ten thousand or more cigarettes.

PATTERN ACT #30

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Munther Mahmoud, Bassam Twam, Murad Bishrat and Mohannad Seif, each aiding the other and acting in concert, committed the crime of **Possession or Transport for the Purpose of Sale, or Sale or Offering For Sale, of Thirty Thousand or More Cigarettes in Unstamped or Unlawfully Stamped Packages** in violation of **N.Y. Tax L. §§ 481(2)(a) & 4 and N.Y. Tax L. § 1814(c)(2)**, in that on or about and between October 21, 2012 and October 28, 2012, in the County of Kings and elsewhere

within the State of New York, and in the States of Delaware and Maryland, not being agents licensed by the Commissioner of the New York State Department of Taxation and Finance, did willfully possess or transport for the purpose of sale, thirty thousand or more cigarettes subject to the tax imposed pursuant to New York State Law in any unstamped or unlawfully stamped packages, and/or willfully sold or offered for sale thirty thousand (30,000) or more cigarettes in any unstamped or unlawfully stamped packages.

PATTERN ACT #31

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Munther Mahmoud, Bassam Twam, Murad Bishrat and Mohannad Seif, each aiding the other and acting in concert, committed the crime of **Money Laundering in the Third Degree** in violation of **Penal Law § 470.10(2)(b)(i)**, in that on or about and between October 21, 2012 and October 28, 2012, in the County of Kings and elsewhere within the State of New York, and in the States of Delaware and Maryland, knowing that one or more monetary instruments, to wit, United States currency, represented the proceeds of criminal conduct, the defendants transported, transmitted, or transferred, or attempted to transport, transmit or transfer, on one or more occasions, monetary instruments which in fact represented the proceeds of specified criminal conduct, to wit, violation of N.Y. Tax L. §§ 481(2)(a) & 4, N.Y. Tax L. §§ 1814(a)(i) and (c)(2) and Enterprise Corruption, from a place in any county in this state to or through a place outside that county or to a place in any county in this state from or through a place outside that county, with intent to promote the carrying on of criminal conduct, and the total value of such monetary instrument or instruments exceeded fifty thousand dollars.

PATTERN ACT #32

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Munther Mahmoud, Bassam Twam, Murad Bishrat and Mohannad Seif, each aiding the other and acting in concert, committed the crime of **Money Laundering in the Third Degree** in violation of **Penal Law § 470.10(1)(b)(i)(A)**, in that on or about and between October 21, 2012 and October 28, 2012, in the County of Kings and elsewhere within the State of New York, and in the States of Delaware and Maryland, knowing that the property, to wit, United States currency, involved in one or more financial transactions represented the proceeds of criminal conduct, the defendants conducted one or more such financial transactions which in fact involved the proceeds of specified criminal conduct, to wit, violation of N.Y. Tax L. §§ 481(2)(a) & 4, N.Y. Tax L. §§ 1814(a)(i) and (c)(2) and Enterprise Corruption, with intent to promote the carrying on of criminal conduct, and the total value involved in such financial transaction or transactions exceeded fifty thousand dollars.

PATTERN ACT #33

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Munther Mahmoud and Nabil Saad Badr, a.k.a. Abu Nabil, each aiding the other and acting in concert, committed the crime of **Possession or Transport for the Purpose of Sale, or Sale or Offering For Sale, of Thirty Thousand or More Cigarettes in Unstamped or Unlawfully Stamped Packages** in violation of **N.Y. Tax L. §§ 481(2)(a) & 4 and N.Y. Tax L. § 1814(c)(2)**, in that on or about October 31, 2012, in the County of Kings, not being agents licensed by the Commissioner of the New York State Department of Taxation and Finance, did willfully possess or transport for the

purpose of sale, thirty thousand or more cigarettes subject to the tax imposed pursuant to New York State Law in any unstamped or unlawfully stamped packages, and/or willfully sold or offered for sale thirty thousand or more cigarettes in any unstamped or unlawfully stamped packages.

PATTERN ACT #34

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Munther Mahmoud and Nabil Saad Badr, a.k.a. Abu Nabil, each aiding the other and acting in concert, committed the crime of **Attempt to Evade or Defeat Cigarette and Tobacco Products Tax** in violation of **N.Y. Tax L. §§ 481(2)(a) & 4 and N.Y. Tax L. § 1814(a)(i)**, in that on or about October 31, 2012, in the County of Kings and elsewhere within the State of New York, and in the States of Delaware and Maryland, did willfully attempt in any manner to evade or defeat the taxes imposed pursuant to New York State Tax Law or payment thereof on ten thousand or more cigarettes.

PATTERN ACT #35

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Munther Mahmoud and Nabil Saad Badr, a.k.a. Abu Nabil, each aiding the other and acting in concert, committed the crime of **Possession or Transport for the Purpose of Sale, or Sale or Offering For Sale, of Thirty Thousand or More Cigarettes in Unstamped or Unlawfully Stamped Packages** in violation of **N.Y. Tax L. §§ 481(2)(a) & 4 and N.Y. Tax L. § 1814(c)(2)**, in that on or about November 1, 2012, in the County of Kings and elsewhere within the State of New York, and in the States of Delaware and Maryland, not being agents licensed by the Commissioner of the

New York State Department of Taxation and Finance, did willfully possess or transport for the purpose of sale, thirty thousand or more cigarettes subject to the tax imposed pursuant to New York State Law in any unstamped or unlawfully stamped packages, and/or willfully sold or offered for sale thirty thousand or more cigarettes in any unstamped or unlawfully stamped packages.

PATTERN ACT #36

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Munther Mahmoud and Nabil Saad Badr, a.k.a. Abu Nabil, each aiding the other and acting in concert, committed the crime of **Attempt to Evade or Defeat Cigarette and Tobacco Products Tax** in violation of **N.Y. Tax L. §§ 481(2)(a) & 3 and N.Y. Tax L. § 1814(a)(i)**, in that on or about November 1, 2012, in the County of Kings and elsewhere within the State of New York, and in the States of Delaware and Maryland, did willfully attempt in any manner to evade or defeat the taxes imposed pursuant to New York State Tax Law or payment thereof on ten thousand or more cigarettes.

PATTERN ACT #37

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Munther Mahmoud and Nabil Saad Badr, a.k.a. Abu Nabil, each aiding the other and acting in concert, committed the crime of **Possession or Transport for the Purpose of Sale, or Sale or Offering For Sale, of Thirty Thousand or More Cigarettes in Unstamped or Unlawfully Stamped Packages** in violation of **N.Y. Tax L. §§ 481(2)(a) & 4 and N.Y. Tax L. § 1814(c)(2)**, in that on or about November 2, 2012, in the County of Kings and elsewhere within the State of New York, and in the

States of Delaware and Maryland, not being agents licensed by the Commissioner of the New York State Department of Taxation and Finance, did willfully possess or transport for the purpose of sale, thirty thousand or more cigarettes subject to the tax imposed pursuant to New York State Law in any unstamped or unlawfully stamped packages, and/or willfully sold or offered for sale thirty thousand or more cigarettes in any unstamped or unlawfully stamped packages.

PATTERN ACT #38

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Munther Mahmoud and Nabil Saad Badr, a.k.a. Abu Nabil, each aiding the other and acting in concert, committed the crime of **Attempt to Evade or Defeat Cigarette and Tobacco Products Tax** in violation of **N.Y. Tax L. §§ 481(2)(a) & 4 and N.Y. Tax L. § 1814(a)(i)**, in that on or about November 2, 2012, in the County of Kings and elsewhere within the State of New York, and in the States of Delaware and Maryland, did willfully attempt in any manner to evade or defeat the taxes imposed pursuant to New York State Tax Law or payment thereof on ten thousand or more cigarettes.

PATTERN ACT #39

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Munther Mahmoud and Nabil Saad Badr, a.k.a. Abu Nabil, each aiding the other and acting in concert, committed the crime of **Possession or Transport for the Purpose of Sale, or Sale or Offering For Sale, of Thirty Thousand or More Cigarettes in Unstamped or Unlawfully Stamped Packages** in violation of **N.Y. Tax L. §§ 481(2)(a) & 4 and N.Y. Tax L. § 1814(c)(2)**, in that on or about November 3,

2012, in the County of Kings and elsewhere within the State of New York, and in the States of Delaware and Maryland, not being agents licensed by the Commissioner of the New York State Department of Taxation and Finance, did willfully possess or transport for the purpose of sale, thirty thousand or more cigarettes subject to the tax imposed pursuant to New York State Law in any unstamped or unlawfully stamped packages, and/or willfully sold or offered for sale thirty thousand or more cigarettes in any unstamped or unlawfully stamped packages.

PATTERN ACT #40

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Munther Mahmoud and Nabil Saad Badr, a.k.a. Abu Nabil, each aiding the other and acting in concert, committed the crime of **Attempt to Evade or Defeat Cigarette and Tobacco Products Tax** in violation of **N.Y. Tax L. §§ 481(2)(a) & 4 and N.Y. Tax L. § 1814(a)(i)**, in that on or about November 3, 2012, in the County of Kings and elsewhere within the State of New York, and in the States of Delaware and Maryland, did willfully attempt in any manner to evade or defeat the taxes imposed pursuant to New York State Tax Law or payment thereof on ten thousand or more cigarettes.

PATTERN ACT #41

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Munther Mahmoud and Nabil Saad Badr, a.k.a. Abu Nabil, each aiding the other and acting in concert, committed the crime of **Money Laundering in the Third Degree** in violation of **Penal Law § 470.10(1)(b)(i)(A)**, in that on or about and between October 31, 2012 and November 3, 2012, in the County of Kings and elsewhere within

the State of New York, and in the States of Delaware and Maryland, knowing that the property, to wit, United States currency, involved in one or more financial transactions represented the proceeds of criminal conduct, the defendants conducted one or more such financial transactions which in fact involved the proceeds of specified criminal conduct, to wit, violation of N.Y. Tax L. §§ 481(2)(a) & 4, N.Y. Tax L. §§ 1814(a)(i) and (c)(2) and Enterprise Corruption, with intent to promote the carrying on of criminal conduct, and the total value involved in such financial transaction or transactions exceeded fifty thousand dollars.

PATTERN ACT #42

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Munther Mahmoud and Nabil Saad Badr, a.k.a. Abu Nabil, each aiding the other and acting in concert, committed the crime of **Money Laundering in the Third Degree** in violation of **Penal Law § 470.10(2)(b)(i)**, in that on or about and between October 31, 2012 and November 3, 2012, in the County of Kings and elsewhere within the State of New York, and in the States of Delaware and Maryland, knowing that one or more monetary instruments, to wit, United States currency, represented the proceeds of criminal conduct, the defendants transported, transmitted, or transferred, or attempted to transport, transmit or transfer, on one or more occasions, monetary instruments which in fact represented the proceeds of specified criminal conduct, to wit, violation of N.Y. Tax L. §§ 481(2)(a) & 4, N.Y. Tax L. §§ 1814(a)(i) and (c)(2) and Enterprise Corruption, from a place in any county in this state to or through a place outside that county or to a place in any county in this state from or through a place outside that county, with intent

to promote the carrying on of criminal conduct, and the total value of such monetary instrument or instruments exceeded fifty thousand dollars.

PATTERN ACT #43

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Munther Mahmoud and Nabil Saad Badr, a.k.a. Abu Nabil, each aiding the other and acting in concert, committed the crime of **Attempt to Evade or Defeat Cigarette and Tobacco Products Tax** in violation of **N.Y. Tax L. §§ 481(2)(a) & 4 and N.Y. Tax L. § 1814(a)(i)**, in that on or about and between November 7, 2012 and November 8, 2012, in the County of Kings and elsewhere within the State of New York, and in the States of Delaware and Maryland, did willfully attempt in any manner to evade or defeat the taxes imposed pursuant to New York State Tax Law or payment thereof on ten thousand or more cigarettes.

PATTERN ACT #44

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Munther Mahmoud and Nabil Saad Badr, a.k.a. Abu Nabil, each aiding the other and acting in concert, committed the crime of **Possession or Transport for the Purpose of Sale, or Sale or Offering For Sale, of Thirty Thousand or More Cigarettes in Unstamped or Unlawfully Stamped Packages** in violation of **N.Y. Tax L. §§ 481(2)(a) & 4 and N.Y. Tax L. § 1814(c)(2)**, in that on or about and between November 7, 2012 and November 8, 2012, in the County of Kings and elsewhere within the State of New York, and in the States of Delaware and Maryland, not being agents licensed by the Commissioner of the New York State Department of Taxation and Finance, did willfully possess or transport for the purpose of sale, thirty thousand or more

cigarettes subject to the tax imposed pursuant to New York State Law in any unstamped or unlawfully stamped packages, and/or willfully sold or offered for sale thirty thousand or more cigarettes in any unstamped or unlawfully stamped packages.

PATTERN ACT #45

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Munther Mahmoud and Nabil Saad Badr, a.k.a. Abu Nabil, each aiding the other and acting in concert, committed the crime of **Money Laundering in the Third Degree** in violation of **Penal Law § 470.10(2)(b)(i)**, in that on or about and between November 7, 2012 and November 8, 2012, in the County of Kings and elsewhere within the State of New York, and in the States of Delaware and Maryland, knowing that one or more monetary instruments, to wit, United States currency, represented the proceeds of criminal conduct, the defendants transported, transmitted, or transferred, or attempted to transport, transmit or transfer, on one or more occasions, monetary instruments which in fact represented the proceeds of specified criminal conduct, to wit, violation of N.Y. Tax L. §§ 481(2)(a) & 4, N.Y. Tax L. §§ 1814(a)(i) and (c)(2) and Enterprise Corruption, from a place in any county in this state to or through a place outside that county or to a place in any county in this state from or through a place outside that county, with intent to promote the carrying on of criminal conduct, and the total value of such monetary instrument or instruments exceeded fifty thousand dollars.

PATTERN ACT #46

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Munther Mahmoud and Nabil Saad Badr, a.k.a. Abu Nabil, each aiding the other and acting in concert, committed the crime of **Money Laundering in the Third**

Degree in violation of **Penal Law § 470.10(1)(b)(i)(A)**, in that on or about and between November 7, 2012 and November 8, 2012, in the County of Kings and elsewhere within the State of New York, and in the States of Delaware and Maryland, knowing that the property, to wit, United States currency, involved in one or more financial transactions represented the proceeds of criminal conduct, the defendants conducted one or more such financial transactions which in fact involved the proceeds of specified criminal conduct, to wit, violation of N.Y. Tax L. §§ 481(2)(a) & 4, N.Y. Tax L. §§ 1814(a)(i) and (c)(2) and Enterprise Corruption, with intent to promote the carrying on of criminal conduct, and the total value involved in such financial transaction or transactions exceeded fifty thousand dollars.

PATTERN ACT #47

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Munther Mahmoud and Nabil Saad Badr, a.k.a. Abu Nabil, each aiding the other and acting in concert, committed the crime of **Attempt to Evade or Defeat Cigarette and Tobacco Products Tax** in violation of **N.Y. Tax L. §§ 481(2)(a) & 4 and N.Y. Tax L. § 1814(a)(i)**, in that on or about November 15, 2012, in the County of Kings and elsewhere within the State of New York, and in the States of Delaware and Maryland, did willfully attempt in any manner to evade or defeat the taxes imposed pursuant to New York State Tax Law or payment thereof on ten thousand or more cigarettes.

PATTERN ACT #48

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Munther Mahmoud and Nabil Saad Badr, a.k.a. Abu Nabil, each aiding the

other and acting in concert, committed the crime of **Possession or Transport for the Purpose of Sale, or Sale or Offering For Sale, of Thirty Thousand or More Cigarettes in Unstamped or Unlawfully Stamped Packages** in violation of **N.Y. Tax L. §§ 481(2)(a) & 4 and N.Y. Tax L. § 1814(c)(2)**, in that on or about November 15, 2012, in the County of Kings and elsewhere within the State of New York, and in the States of Delaware and Maryland, not being agents licensed by the Commissioner of the New York State Department of Taxation and Finance, did willfully possess or transport for the purpose of sale, thirty thousand or more cigarettes subject to the tax imposed pursuant to New York State Law in any unstamped or unlawfully stamped packages, and/or willfully sold or offered for sale thirty thousand or more cigarettes in any unstamped or unlawfully stamped packages.

PATTERN ACT #49

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Munther Mahmoud and Nabil Saad Badr, a.k.a. Abu Nabil, each aiding the other and acting in concert, committed the crime of **Money Laundering in the Second Degree** in violation of **Penal Law § 470.15(2)(b)(i)**, in that on or about and between November 14, 2012 and November 15, 2012, in the County of Kings and elsewhere within the State of New York, and in the States of Delaware and Maryland, knowing that one or more monetary instruments, to wit, United States currency, represented the proceeds of specified criminal conduct, the defendants transported, transmitted, or transferred, or attempted to transport, transmit or transfer, on one or more occasions, monetary instruments which in fact represented the proceeds of specified criminal conduct, to wit, violation of **N.Y. Tax L. §§ 481(2)(a) & 4, N.Y. Tax L. §§ 1814(a)(i) and**

(c)(2) and Enterprise Corruption, from a place in any county in this state to or through a place outside that county or to a place in any county in this state from or through a place outside that county, with intent to promote the carrying on of specified criminal conduct, and the total value of such monetary instrument or instruments exceeded one hundred thousand dollars.

PATTERN ACT #50

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Munther Mahmoud and Nabil Saad Badr, a.k.a. Abu Nabil, each aiding the other and acting in concert, committed the crime of **Money Laundering in the Second Degree** in violation of **Penal Law § 470.15(1)(b)(i)(A)**, in that on or about and between November 14, 2012 and November 15, 2012, in the County of Kings and elsewhere within the State of New York, and in the States of Delaware and Maryland, knowing that the property, to wit, United States currency, involved in one or more financial transactions represented the proceeds of specified criminal conduct, the defendants conducted one or more such financial transactions which in fact involved the proceeds of specified criminal conduct, to wit, violation of N.Y. Tax L. §§ 481(2)(a) & 4, N.Y. Tax L. §§ 1814(a)(i) and (c)(2) and Enterprise Corruption, with intent to promote the carrying on of specified criminal conduct, and the total value involved in such financial transaction or transactions exceeded one hundred thousand dollars.

PATTERN ACT #51

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Munther Mahmoud and Nabil Saad Badr, a.k.a. Abu Nabil, each aiding the other and acting in concert, committed the crime of **Attempt to Evade or Defeat**

Cigarette and Tobacco Products Tax in violation of **N.Y. Tax L. §§ 481(2)(a) & 4 and N.Y. Tax L. § 1814(a)(i)**, in that on or about January 19, 2013, in the County of Kings and elsewhere within the State of New York, and in the States of Delaware and Maryland, did willfully attempt in any manner to evade or defeat the taxes imposed pursuant to New York State Tax Law or payment thereof on ten thousand or more cigarettes.

PATTERN ACT #52

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Munther Mahmoud and Nabil Saad Badr, a.k.a. Abu Nabil, each aiding the other and acting in concert, committed the crime of **Possession or Transport for the Purpose of Sale, or Sale or Offering For Sale, of Thirty Thousand or More Cigarettes in Unstamped or Unlawfully Stamped Packages** in violation of **N.Y. Tax L. §§ 481(2)(a) & 4 and N.Y. Tax L. § 1814(c)(2)**, in that on or about January 19, 2013, in the County of Kings and elsewhere within the State of New York, and in the States of Delaware and Maryland, not being agents licensed by the Commissioner of the New York State Department of Taxation and Finance, did willfully possess or transport for the purpose of sale, thirty thousand or more cigarettes subject to the tax imposed pursuant to New York State Law in any unstamped or unlawfully stamped packages, and/or willfully sold or offered for sale thirty thousand or more cigarettes in any unstamped or unlawfully stamped packages.

PATTERN ACT #53

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Munther Mahmoud and Nabil Saad Badr, a.k.a. Abu Nabil, each aiding the

other and acting in concert, committed the crime of **Attempt to Evade or Defeat Cigarette and Tobacco Products Tax** in violation of **N.Y. Tax L. §§ 481(2)(a) & 4 and N.Y. Tax L. § 1814(a)(i)**, in that on or about January 20, 2013, in the County of Kings and elsewhere within the State of New York, and in the States of Delaware and Maryland, did willfully attempt in any manner to evade or defeat the taxes imposed pursuant to New York State Tax Law or payment thereof on ten thousand or more cigarettes.

PATTERN ACT #54

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Munther Mahmoud and Nabil Saad Badr, a.k.a. Abu Nabil, each aiding the other and acting in concert, committed the crime of **Possession or Transport for the Purpose of Sale, or Sale or Offering For Sale, of Thirty Thousand or More Cigarettes in Unstamped or Unlawfully Stamped Packages** in violation of **N.Y. Tax L. §§ 481(2)(a) & 4 and N.Y. Tax L. § 1814(c)(2)**, in that on or about January 20, 2013, in the County of Kings and elsewhere within the State of New York, and in the States of Delaware and Maryland, not being agents licensed by the Commissioner of the New York State Department of Taxation and Finance, did willfully possess or transport for the purpose of sale, thirty thousand or more cigarettes subject to the tax imposed pursuant to New York State Law in any unstamped or unlawfully stamped packages, and/or willfully sold or offered for sale thirty thousand or more cigarettes in any unstamped or unlawfully stamped packages.

PATTERN ACT #55

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Munther Mahmoud and Nabil Saad Badr, a.k.a. Abu Nabil, each aiding the other and acting in concert, committed the crime of **Attempt to Evade or Defeat Cigarette and Tobacco Products Tax** in violation of **N.Y. Tax L. §§ 481(2)(a) & 4 and N.Y. Tax L. § 1814(a)(i)**, in that on or about January 21, 2013, in the County of Kings and elsewhere within the State of New York, and in the States of Delaware and Maryland, did willfully attempt in any manner to evade or defeat the taxes imposed pursuant to New York State Tax Law or payment thereof on ten thousand or more cigarettes.

PATTERN ACT #56

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Munther Mahmoud and Nabil Saad Badr, a.k.a. Abu Nabil, each aiding the other and acting in concert, committed the crime of **Possession or Transport for the Purpose of Sale, or Sale or Offering For Sale, of Thirty Thousand or More Cigarettes in Unstamped or Unlawfully Stamped Packages** in violation of **N.Y. Tax L. §§ 481(2)(a) & 4 and N.Y. Tax L. § 1814(c)(2)**, in that on or about January 21, 2013, in the County of Kings and elsewhere within the State of New York, and in the States of Delaware and Maryland, not being agents licensed by the Commissioner of the New York State Department of Taxation and Finance, did willfully possess or transport for the purpose of sale, thirty thousand or more cigarettes subject to the tax imposed pursuant to New York State Law in any unstamped or unlawfully stamped packages, and/or willfully

sold or offered for sale thirty thousand or more cigarettes in any unstamped or unlawfully stamped packages.

PATTERN ACT #57

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Munther Mahmoud and Nabil Saad Badr, a.k.a. Abu Nabil, each aiding the other and acting in concert, committed the crime of **Money Laundering in the Second Degree** in violation of **Penal Law § 470.15(2)(b)(i)**, in that on or about and between January 19, 2013 and January 24, 2013, in the County of Kings and elsewhere within the State of New York, and in the States of Delaware and Maryland, knowing that one or more monetary instruments, to wit, United States currency, represented the proceeds of specified criminal conduct, the defendants transported, transmitted, or transferred, or attempted to transport, transmit or transfer, on one or more occasions, monetary instruments which in fact represented the proceeds of specified criminal conduct, to wit, violation of N.Y. Tax L. §§ 481(2)(a) & 4, N.Y. Tax L. §§ 1814(a)(i) and (c)(2) and Enterprise Corruption, from a place in any county in this state to or through a place outside that county or to a place in any county in this state from or through a place outside that county, with intent to promote the carrying on of specified criminal conduct, and the total value of such monetary instrument or instruments exceeded one hundred thousand dollars.

PATTERN ACT #58

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Munther Mahmoud and Nabil Saad Badr, a.k.a. Abu Nabil, each aiding the other and acting in concert, committed the crime of **Money Laundering in the Second**

Degree in violation of **Penal Law § 470.15(1)(b)(i)(A)**, in that on or about and between January 19, 2013 and January 24, 2013, in the County of Kings and elsewhere within the State of New York, and in the States of Delaware and Maryland, knowing that the property, to wit, United States currency, involved in one or more financial transactions represented the proceeds of specified criminal conduct, the defendants conducted one or more such financial transactions which in fact involved the proceeds of specified criminal conduct, to wit, violation of N.Y. Tax L. §§ 481(2)(a) & 4, N.Y. Tax L. §§ 1814(a)(i) and (c)(2) and Enterprise Corruption, with intent to promote the carrying on of specified criminal conduct, and the total value involved in such financial transaction or transactions exceeded one hundred thousand dollars.

PATTERN ACT #59

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Munther Mahmoud and Nabil Saad Badr, a.k.a. Abu Nabil, each aiding the other and acting in concert, committed the crime of **Attempt to Evade or Defeat Cigarette and Tobacco Products Tax** in violation of **N.Y. Tax L. §§ 481(2)(a) & 4 and N.Y. Tax L. § 1814(a)(i)**, in that on or about February 12, 2013, in the County of Kings and elsewhere within the State of New York, and in the States of Delaware and Maryland, did willfully attempt in any manner to evade or defeat the taxes imposed pursuant to New York State Tax Law or payment thereof on ten thousand or more cigarettes.

PATTERN ACT #60

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Munther Mahmoud and Nabil Saad Badr, a.k.a. Abu Nabil, each aiding the

other and acting in concert, committed the crime of **Possession or Transport for the Purpose of Sale, or Sale or Offering For Sale, of Thirty Thousand or More Cigarettes in Unstamped or Unlawfully Stamped Packages** in violation of **N.Y. Tax L. §§ 481(2)(a) & 4 and N.Y. Tax L. § 1814(c)(2)**, in that on or about February 12, 2013, in the County of Kings and elsewhere within the State of New York, and in the States of Delaware and Maryland, not being agents licensed by the Commissioner of the New York State Department of Taxation and Finance, did willfully possess or transport for the purpose of sale, thirty thousand or more cigarettes subject to the tax imposed pursuant to New York State Law in any unstamped or unlawfully stamped packages, and/or willfully sold or offered for sale thirty thousand or more cigarettes in any unstamped or unlawfully stamped packages.

PATTERN ACT #61

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Munther Mahmoud and Nabil Saad Badr, a.k.a. Abu Nabil, each aiding the other and acting in concert, committed the crime of **Attempt to Evade or Defeat Cigarette and Tobacco Products Tax** in violation of **N.Y. Tax L. §§ 481(2)(a) & 4 and N.Y. Tax L. § 1814(a)(i)**, in that on or about February 13, 2013, in the County of Kings and elsewhere within the State of New York, and in the States of Delaware and Maryland, did willfully attempt in any manner to evade or defeat the taxes imposed pursuant to New York State Tax Law or payment thereof on ten thousand or more cigarettes.

PATTERN ACT #62

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Munther Mahmoud and Nabil Saad Badr, a.k.a. Abu Nabil, each aiding the other and acting in concert, committed the crime of **Possession or Transport for the Purpose of Sale, or Sale or Offering For Sale, of Thirty Thousand or More Cigarettes in Unstamped or Unlawfully Stamped Packages** in violation of **N.Y. Tax L. §§ 481(2)(a) & 4 and N.Y. Tax L. § 1814(c)(2)**, in that on or about February 13, 2013, in the County of Kings and elsewhere within the State of New York, and in the States of Delaware and Maryland, not being agents licensed by the Commissioner of the New York State Department of Taxation and Finance, did willfully possess or transport for the purpose of sale, thirty thousand or more cigarettes subject to the tax imposed pursuant to New York State Law in any unstamped or unlawfully stamped packages, and/or willfully sold or offered for sale thirty thousand or more cigarettes in any unstamped or unlawfully stamped packages.

PATTERN ACT #63

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Munther Mahmoud and Nabil Saad Badr, a.k.a. Abu Nabil, each aiding the other and acting in concert, committed the crime of **Attempt to Evade or Defeat Cigarette and Tobacco Products Tax** in violation of **N.Y. Tax L. §§ 481(2)(a) & 4 and N.Y. Tax L. § 1814(a)(i)**, in that on or about February 14, 2013, in the County of Kings and elsewhere within the State of New York, and in the States of Delaware and Maryland, did willfully attempt in any manner to evade or defeat the taxes imposed

pursuant to New York State Tax Law or payment thereof on ten thousand or more cigarettes.

PATTERN ACT #64

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Munther Mahmoud and Nabil Saad Badr, a.k.a. Abu Nabil, each aiding the other and acting in concert, committed the crime of **Possession or Transport for the Purpose of Sale, or Sale or Offering For Sale, of Thirty Thousand or More Cigarettes in Unstamped or Unlawfully Stamped Packages** in violation of **N.Y. Tax L. §§ 481(2)(a) & 4 and N.Y. Tax L. § 1814(c)(2)**, in that on or about February 14, 2013, in the County of Kings and elsewhere within the State of New York, and in the States of Delaware and Maryland, not being agents licensed by the Commissioner of the New York State Department of Taxation and Finance, did willfully possess or transport for the purpose of sale, thirty thousand or more cigarettes subject to the tax imposed pursuant to New York State Law in any unstamped or unlawfully stamped packages, and/or willfully sold or offered for sale thirty thousand or more cigarettes in any unstamped or unlawfully stamped packages.

PATTERN ACT #65

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Munther Mahmoud and Nabil Saad Badr, a.k.a. Abu Nabil, each aiding the other and acting in concert, committed the crime of **Attempt to Evade or Defeat Cigarette and Tobacco Products Tax** in violation of **N.Y. Tax L. §§ 481(2)(a) & 4 and**

N.Y. Tax L. § 1814(a)(i), in that on or about February 15, 2013, in the County of Kings and elsewhere within the State of New York, and in the States of Delaware and Maryland, did willfully attempt in any manner to evade or defeat the taxes imposed pursuant to New York State Tax Law or payment thereof on ten thousand or more cigarettes.

PATTERN ACT #66

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Munther Mahmoud and Nabil Saad Badr, a.k.a. Abu Nabil, each aiding the other and acting in concert, committed the crime of **Possession or Transport for the Purpose of Sale, or Sale or Offering For Sale, of Thirty Thousand or More Cigarettes in Unstamped or Unlawfully Stamped Packages** in violation of N.Y. Tax L. §§ 481(2)(a) & 4 and N.Y. Tax L. § 1814(c)(2), in that on or about February 15, 2013, in the County of Kings and elsewhere within the State of New York, and in the States of Delaware and Maryland, not being agents licensed by the Commissioner of the New York State Department of Taxation and Finance, did willfully possess or transport for the purpose of sale, thirty thousand or more cigarettes subject to the tax imposed pursuant to New York State Law in any unstamped or unlawfully stamped packages, and/or willfully sold or offered for sale thirty thousand or more cigarettes in any unstamped or unlawfully stamped packages.

PATTERN ACT #67

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Munther Mahmoud and Nabil Saad Badr, a.k.a. Abu Nabil, each aiding the other and acting in concert, committed the crime of Attempt to **Evade or Defeat**

Cigarette and Tobacco Products Tax in violation of **N.Y. Tax L. §§ 481(2)(a) & 4 and N.Y. Tax L. § 1814(a)(i)**, in that on or about February 16, 2013, in the County of Kings and elsewhere within the State of New York, and in the States of Delaware and Maryland, did willfully attempt in any manner to evade or defeat the taxes imposed pursuant to New York State Tax Law or payment thereof on ten thousand or more cigarettes.

PATTERN ACT #68

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Munther Mahmoud and Nabil Saad Badr, a.k.a. Abu Nabil, each aiding the other and acting in concert, committed the crime of **Possession or Transport for the Purpose of Sale, or Sale or Offering For Sale, of Thirty Thousand or More Cigarettes in Unstamped or Unlawfully Stamped Packages** in violation of **N.Y. Tax L. §§ 481(2)(a) & 4 and N.Y. Tax L. § 1814(c)(2)**, in that on or about February 16, 2013, in the County of Kings and elsewhere within the State of New York, and in the States of Delaware and Maryland, not being agents licensed by the Commissioner of the New York State Department of Taxation and Finance, did willfully possess or transport for the purpose of sale, thirty thousand or more cigarettes subject to the tax imposed pursuant to New York State Law in any unstamped or unlawfully stamped packages, and/or willfully sold or offered for sale thirty thousand or more cigarettes in any unstamped or unlawfully stamped packages.

PATTERN ACT #69

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Munther Mahmoud and Nabil Saad Badr, a.k.a. Abu Nabil, each aiding the

other and acting in concert, committed the crime of **Money Laundering in the Second Degree** in violation of **Penal Law § 470.15(2)(b)(i)**, in that on or about and between February 12, 2013 and February 17, 2013, in the County of Kings and elsewhere within the State of New York, and in the States of Delaware and Maryland, knowing that one or more monetary instruments, to wit, United States currency, represented the proceeds of specified criminal conduct, the defendants transported, transmitted, or transferred, or attempted to transport, transmit or transfer, on one or more occasions, monetary instruments which in fact represented the proceeds of specified criminal conduct, to wit, violation of N.Y. Tax L. §§ 481(2)(a) & 4, N.Y. Tax L. §§ 1814(a)(i) and (c)(2) and Enterprise Corruption, from a place in any county in this state to or through a place outside that county or to a place in any county in this state from or through a place outside that county, with intent to promote the carrying on of specified criminal conduct, and the total value of such monetary instrument or instruments exceeded one hundred thousand dollars.

PATTERN ACT #70

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Munther Mahmoud and Nabil Saad Badr, a.k.a. Abu Nabil, each aiding the other and acting in concert, committed the crime of **Money Laundering in the Second Degree** in violation of **Penal Law § 470.15(1)(b)(i)(A)**, in that on or about and between February 12, 2013 and February 17, 2013, in the County of Kings and elsewhere within the State of New York, and in the States of Delaware and Maryland, knowing that the property, to wit, United States currency, involved in one or more financial transactions represented the proceeds of specified criminal conduct, the defendants conducted one or

more such financial transactions which in fact involved the proceeds of specified criminal conduct, to wit, violation of N.Y. Tax L. §§ 481(2)(a) & 4, N.Y. Tax L. §§ 1814(a)(i) and (c)(2) and Enterprise Corruption, with intent to promote the carrying on of specified criminal conduct, and the total value involved in such financial transaction or transactions exceeded one hundred thousand dollars.

PATTERN ACT #71

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu Saleem, each aiding the other and acting in concert, committed the crime of **Attempt to Evade or Defeat Cigarette and Tobacco Products Tax** in violation of **N.Y. Tax L. §§ 481(2)(a) & 4 and N.Y. Tax L. § 1814(a)(i)**, in that on or about December 4, 2012, in the County of Kings and elsewhere within the State of New York, and in the States of Delaware and Maryland, did willfully attempt in any manner to evade or defeat the taxes imposed pursuant to New York State Tax Law or payment thereof on ten thousand (10,000) or more cigarettes.

PATTERN ACT #72

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu Saleem, each aiding the other and acting in concert, committed the crime of **Possession or Transport for the Purpose of Sale, or Sale or Offering For Sale, of Thirty Thousand or More Cigarettes in Unstamped or Unlawfully Stamped Packages** in violation of **N.Y. Tax L. §§ 481(2)(a) & 4 and N.Y. Tax L. § 1814(c)(2)**, in that on or about December 4, 2012, in the County of Kings and elsewhere within the State of New

York, and in the States of Delaware and Maryland, not being agents licensed by the Commissioner of the New York State Department of Taxation and Finance, did willfully possess or transport for the purpose of sale, thirty thousand or more cigarettes subject to the tax imposed pursuant to New York State Law in any unstamped or unlawfully stamped packages, and/or willfully sold or offered for sale thirty thousand or more cigarettes in any unstamped or unlawfully stamped packages.

PATTERN ACT #73

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu Saleem, each aiding the other and acting in concert, committed the crime of **Money Laundering in the Third Degree** in violation of **Penal Law § 470.10(2)(b)(i)**, in that on or about December 4, 2012, in the County of Kings and elsewhere within the State of New York, and in the States of Delaware and Maryland, knowing that one or more monetary instruments, to wit, United States currency, represented the proceeds of criminal conduct, the defendants transported, transmitted, or transferred, or attempted to transport, transmit or transfer, on one or more occasions, monetary instruments which in fact represented the proceeds of specified criminal conduct, to wit, violation of N.Y. Tax L. §§ 481(2)(a) & 4, N.Y. Tax L. §§ 1814(a)(i) and (c)(2) and Enterprise Corruption, from a place in any county in this state to or through a place outside that county or to a place in any county in this state from or through a place outside that county, with intent to promote the carrying on of criminal conduct, and the total value of such monetary instrument or instruments exceeded fifty thousand dollars.

PATTERN ACT #74

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu Saleem, each aiding the other and acting in concert, committed the crime of **Money Laundering in the Third Degree** in violation of **Penal Law § 470.10(1)(b)(i)(A)**, in that on or about December 4, 2012, in the County of Kings and elsewhere within the State of New York, and in the States of Delaware and Maryland, knowing that the property, to wit, United States currency, involved in one or more financial transactions represented the proceeds of criminal conduct, the defendants conducted one or more such financial transactions which in fact involved the proceeds of specified criminal conduct, to wit, violation of N.Y. Tax L. §§ 481(2)(a) & 4, N.Y. Tax L. §§ 1814(a)(i) and (c)(2) and Enterprise Corruption, with intent to promote the carrying on of criminal conduct, and the total value involved in such financial transaction or transactions exceeded fifty thousand dollars.

PATTERN ACT #75

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu Saleem, each aiding the other and acting in concert, committed the crime of **Criminal Possession of a Forged Instrument in the First Degree** in violation of **Penal Law § 170.30**, in that on or about December 4, 2012, in the County of Kings and elsewhere within the State of New York, and in the States of Delaware and Maryland, with knowledge that it is forged and with intent to defraud, deceive or injure another, the

defendants uttered any forged instrument of a kind specified in Penal Law section 170.15, to wit, New York State tax stamps.

PATTERN ACT #76

Defendants Basel Ramadan, a.k.a. Abu Salah, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Mufeed Attal, a.k.a. Abu Saleem, and Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali, each aiding the other and acting in concert, committed the crime of **Possession or Transport for the Purpose of Sale, or Sale or Offering For Sale, of Thirty Thousand or More Cigarettes in Unstamped or Unlawfully Stamped Packages** in violation of **N.Y. Tax L. §§ 481(2)(a) & 4 and N.Y. Tax L. § 1814(c)(2)**, in that on or about November 4, 2012, in the County of Kings and elsewhere within the State of New York, and in the States of Delaware and Maryland, not being agents licensed by the Commissioner of the New York State Department of Taxation and Finance, did willfully possess or transport for the purpose of sale, thirty thousand or more cigarettes subject to the tax imposed pursuant to New York State Law in any unstamped or unlawfully stamped packages, and/or willfully sold or offered for sale thirty thousand or more cigarettes in any unstamped or unlawfully stamped packages.

PATTERN ACT #77

Defendants Basel Ramadan, a.k.a. Abu Salah, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Mufeed Attal, a.k.a. Abu Saleem, and Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali, each aiding the other and acting in concert, committed the crime of **Attempt to Evade or Defeat Cigarette and Tobacco Products Tax** in violation of **N.Y. Tax L. §§ 481(2)(a) & 4 and N.Y. Tax L. §**

1814(a)(i), in that on or about November 4, 2012, in the County of Kings and elsewhere within the State of New York, and in the States of Delaware and Maryland, did willfully attempt in any manner to evade or defeat the taxes imposed pursuant to New York State Tax Law or payment thereof on ten thousand or more cigarettes.

PATTERN ACT #78

Defendants Basel Ramadan, a.k.a. Abu Salah, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Mufeed Attal, a.k.a. Abu Saleem, and Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali, each aiding the other and acting in concert, committed the crime of **Money Laundering in the Fourth Degree** in violation of **Penal Law § 470.05(2)(a)(i)**, in that on or about November 4, 2012, in the County of Kings and elsewhere within the State of New York, and in the States of Delaware and Maryland, knowing that one or more monetary instruments to wit, United States currency, represented the proceeds of criminal conduct, the defendants transported, transmitted, or transferred, or attempted to transport, transmit or transfer, on one or more occasions, monetary instruments which in fact represented the proceeds of specified criminal conduct, to wit, violation of N.Y. Tax L. §§ 481(2)(a) & 4, N.Y. Tax L. §§ 1814(a)(i) and (c)(2) and Enterprise Corruption, with intent to promote the carrying on of criminal conduct, and the total value of such monetary instrument or instruments exceeded ten thousand dollars.

PATTERN ACT #79

Defendants Basel Ramadan, a.k.a. Abu Salah, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Mufeed Attal, a.k.a. Abu Saleem, and Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali, each aiding the other and

acting in concert, committed the crime of **Money Laundering in the Fourth Degree** in violation of **Penal Law § 470.05(1)(a)(i)(A)**, in that on or about November 4, 2012, in the County of Kings and elsewhere within the State of New York, and in the States of Delaware and Maryland, knowing that the property, to wit, United States currency, involved in one or more financial transactions represented the proceeds of criminal conduct, the defendants conducted one or more such financial transactions which in fact involved the proceeds of specified criminal conduct, to wit, violation of N.Y. Tax L. §§ 481(2)(a) & 4, N.Y. Tax L. §§ 1814(a)(i) and (c)(2) and Enterprise Corruption, with intent to promote the carrying on of criminal conduct, and the total value involved in such financial transaction or transactions exceeded five thousand dollars.

PATTERN ACT #80

Defendants Basel Ramadan, a.k.a. Abu Salah, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali, Mufeed Attal, a.k.a. Abu Saleem and Murad Bishrat, each aiding the other and acting in concert, committed the crime of **Possession or Transport for the Purpose of Sale, or Sale or Offering For Sale, of Thirty Thousand or More Cigarettes in Unstamped or Unlawfully Stamped Packages** in violation of **N.Y. Tax L. §§ 481(2)(a) & 4 and N.Y. Tax L. § 1814(c)(2)**, in that on or about November 30, 2012, in the County of Kings and elsewhere within the State of New York, and in the States of Delaware and Maryland, not being agents licensed by the Commissioner of the New York State Department of Taxation and Finance, did willfully possess or transport for the purpose of sale, thirty thousand or more cigarettes subject to the tax imposed pursuant to New York State Law in any unstamped or unlawfully stamped packages,

and/or willfully sold or offered for sale thirty thousand or more cigarettes in any unstamped or unlawfully stamped packages.

PATTERN ACT #81

Defendants Basel Ramadan, a.k.a. Abu Salah, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali, Mufeed Attal, a.k.a. Abu Saleem and Murad Bishrat, each aiding the other and acting in concert, committed the crime of **Attempt to Evade or Defeat Cigarette and Tobacco Products Tax** in violation of **N.Y. Tax L. §§ 481(2)(a) & 4 and N.Y. Tax L. § 1814(a)(i)**, in that on or about November 30, 2012, in the County of Kings and elsewhere within the State of New York, and in the States of Delaware and Maryland, did willfully attempt in any manner to evade or defeat the taxes imposed pursuant to New York State Tax Law or payment thereof on ten thousand or more cigarettes.

PATTERN ACT #82

Defendants Basel Ramadan, a.k.a. Abu Salah, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali, Mufeed Attal, a.k.a. Abu Saleem and Murad Bishrat, each aiding the other and acting in concert, committed the crime of **Money Laundering in the Fourth Degree** in violation of **Penal Law § 470.05(2)(a)(i)**, in that on or about November 30, 2012, in the County of Kings and elsewhere within the State of New York, and in the States of Delaware and Maryland, knowing that one or more monetary instruments, to wit, United States currency, represented the proceeds of criminal conduct, the defendants transported, transmitted, or transferred, or attempted to transport, transmit or transfer, on one or more occasions, monetary instruments which in fact represented the proceeds of specified criminal conduct, to wit, violation of N.Y. Tax L.

§§ 481(2)(a) & 4, N.Y. Tax L. §§ 1814(a)(i) and (c)(2) and Enterprise Corruption, with intent to promote the carrying on of criminal conduct, and the total value of such monetary instrument or instruments exceeded ten thousand dollars.

PATTERN ACT #83

Defendants Basel Ramadan, a.k.a. Abu Salah, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali, Mufeed Attal, a.k.a. Abu Saleem and Murad Bishrat, each aiding the other and acting in concert, committed the crime of **Money Laundering in the Fourth Degree** in violation of **Penal Law § 470.05(1)(a)(i)(A)**, in that on or about November 30, 2012, in the County of Kings and elsewhere within the State of New York, and in the States of Delaware and Maryland, knowing that the property, to wit, United States currency, involved in one or more financial transactions represented the proceeds of criminal conduct, the defendants conducted one or more such financial transactions which in fact involved the proceeds of specified criminal conduct, to wit, violation of N.Y. Tax L. §§ 481(2)(a) & 4, N.Y. Tax L. §§ 1814(a)(i) and (c)(2) and Enterprise Corruption, with intent to promote the carrying on of criminal conduct, and the total value involved in such financial transaction or transactions exceeded five thousand dollars.

PATTERN ACT #84

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali, Mufeed Attal, a.k.a. Abu Saleem and Murad Bishrat, each aiding the other and acting in concert, committed the crime of **Attempt to Evade or Defeat**

Cigarette and Tobacco Products Tax in violation of **N.Y. Tax L. §§ 481(2)(a) & 4 and N.Y. Tax L. § 1814(a)(i)**, in that on or about and between December 26, 2012 and December 27, 2012, in the County of Kings and elsewhere within the State of New York, and in the States of Delaware and Maryland, did willfully attempt in any manner to evade or defeat the taxes imposed pursuant to New York State Tax Law or payment thereof on ten thousand or more cigarettes.

PATTERN ACT #85

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali, Mufeed Attal, a.k.a. Abu Saleem and Murad Bishrat, each aiding the other and acting in concert, committed the crime of **Possession or Transport for the Purpose of Sale, or Sale or Offering For Sale, of Thirty Thousand or More Cigarettes in Unstamped or Unlawfully Stamped Packages** in violation of **N.Y. Tax L. §§ 481(2)(a) & 4 and N.Y. Tax L. § 1814(c)(2)**, in that on or about and between December 26, 2012 and December 27, 2012, in the County of Kings and elsewhere within the State of New York, and in the States of Delaware and Maryland, not being agents licensed by the Commissioner of the New York State Department of Taxation and Finance, did willfully possess or transport for the purpose of sale, thirty thousand or more cigarettes subject to the tax imposed pursuant to New York State Law in any unstamped or unlawfully stamped packages, and/or willfully sold or offered for sale thirty thousand or more cigarettes in any unstamped or unlawfully stamped packages.

PATTERN ACT #86

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali, Mufeed Attal, a.k.a. Abu Saleem and Murad Bishrat, each aiding the other and acting in concert, committed the crime of **Money Laundering in the Third Degree** in violation of **Penal Law § 470.10(2)(b)(i)**, in that on or about and between December 26, 2012 and December 27, 2012, in the County of Kings and elsewhere within the State of New York, and in the States of Delaware and Maryland, knowing that one or more monetary instruments, to wit, United States currency, represented the proceeds of criminal conduct, the defendants transported, transmitted, or transferred, or attempted to transport, transmit or transfer, on one or more occasions, monetary instruments which in fact represented the proceeds of specified criminal conduct, to wit, violation of N.Y. Tax L. §§ 481(2)(a) & 4, N.Y. Tax L. §§ 1814(a)(i) and (c)(2) and Enterprise Corruption, from a place in any county in this state to or through a place outside that county or to a place in any county in this state from or through a place outside that county, with intent to promote the carrying on of criminal conduct, and the total value of such monetary instrument or instruments exceeded fifty thousand dollars.

PATTERN ACT #87

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali, Mufeed Attal, a.k.a. Abu Saleem and Murad Bishrat, each aiding the other and acting in concert, committed the crime of **Money Laundering in the Third**

Degree in violation of **Penal Law § 470.10(1)(b)(i)(A)**, in that on or about and between December 26, 2012 and December 27, 2012, in the County of Kings and elsewhere within the State of New York, and in the States of Delaware and Maryland, knowing that the property, to wit, United States currency, involved in one or more financial transactions represented the proceeds of criminal conduct, the defendants conducted one or more such financial transactions which in fact involved the proceeds of specified criminal conduct, to wit, violation of N.Y. Tax L. §§ 481(2)(a) & 4, N.Y. Tax L. §§ 1814(a)(i) and (c)(2) and Enterprise Corruption, with intent to promote the carrying on of criminal conduct, and the total value involved in such financial transaction or transactions exceeded fifty thousand dollars.

PATTERN ACT #88

Defendants Basel Ramadan, a.k.a. Abu Salah, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu Saleem, each aiding the other and acting in concert, committed the crime of **Attempt to Evade or Defeat Cigarette and Tobacco Products Tax** in violation of **N.Y. Tax L. §§ 481(2)(a) & 4 and N.Y. Tax L. § 1814(a)(i)**, in that on or about February 3, 2013, in the County of Kings and elsewhere within the State of New York, and in the States of Delaware and Maryland, did willfully attempt in any manner to evade or defeat the taxes imposed pursuant to New York State Tax Law or payment thereof on ten thousand or more cigarettes.

PATTERN ACT #89

Defendants Basel Ramadan, a.k.a. Abu Salah, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu Saleem, each aiding the other and acting in concert, committed the crime of **Possession or Transport for the Purpose of**

Sale, or Sale or Offering For Sale, of Thirty Thousand or More Cigarettes in Unstamped or Unlawfully Stamped Packages in violation of **N.Y. Tax L. §§ 481(2)(a) & 4 and N.Y. Tax L. § 1814(c)(2)**, in that on or about February 3, 2013, in the County of Kings and elsewhere within the State of New York, and in the States of Delaware and Maryland, not being agents licensed by the Commissioner of the New York State Department of Taxation and Finance, did willfully possess or transport for the purpose of sale, thirty thousand or more cigarettes subject to the tax imposed pursuant to New York State Law in any unstamped or unlawfully stamped packages, and/or willfully sold or offered for sale thirty thousand or more cigarettes in any unstamped or unlawfully stamped packages.

PATTERN ACT #90

Defendants Basel Ramadan, a.k.a. Abu Salah, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu Saleem, each aiding the other and acting in concert, committed the crime of **Money Laundering in the Fourth Degree** in violation of **Penal Law § 470.05(2)(a)(i)**, in that on or about February 3, 2013, in the County of Kings and elsewhere within the State of New York, and in the States of Delaware and Maryland, knowing that one or more monetary instruments, to wit, United States currency, represented the proceeds of criminal conduct, the defendants transported, transmitted, or transferred, or attempted to transport, transmit or transfer, on one or more occasions, monetary instruments which in fact represented the proceeds of specified criminal conduct, to wit, violation of **N.Y. Tax L. §§ 481(2)(a) & 4, N.Y. Tax L. §§ 1814(a)(i) and (c)(2) and Enterprise Corruption**, with intent to promote the carrying on of

criminal conduct, and the total value of such monetary instrument or instruments exceeded ten thousand dollars.

PATTERN ACT #91

Defendants Basel Ramadan, a.k.a. Abu Salah, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu Saleem, each aiding the other and acting in concert, committed the crime of **Money Laundering in the Fourth Degree** in violation of **Penal Law § 470.05(1)(a)(i)(A)**, in that on or about February 3, 2013, in the County of Kings and elsewhere within the State of New York, and in the States of Delaware and Maryland, knowing that the property, to wit, United States currency, involved in one or more financial transactions represented the proceeds of criminal conduct, the defendants conducted one or more such financial transactions which in fact involved the proceeds of specified criminal conduct, to wit, violation of N.Y. Tax L. §§ 481(2)(a) & 4, N.Y. Tax L. §§ 1814(a)(i) and (c)(2) and Enterprise Corruption, with intent to promote the carrying on of criminal conduct, and the total value involved in such financial transaction or transactions exceeded five thousand dollars.

PATTERN ACT #92

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu Saleem, each aiding the other and acting in concert, committed the crime of **Attempt to Evade or Defeat Cigarette and Tobacco Products Tax** in violation of **N.Y. Tax L. §§ 481(2)(a) & 4 and N.Y. Tax L. § 1814(a)(i)**, in that on or about February 5, 2013, in the County of Kings, did willfully attempt in any manner to evade or defeat the taxes

imposed pursuant to New York State Tax Law or payment thereof on ten thousand or more cigarettes.

PATTERN ACT #93

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu Saleem, each aiding the other and acting in concert, committed the crime of **Possession or Transport for the Purpose of Sale, or Sale or Offering For Sale, of Thirty Thousand or More Cigarettes in Unstamped or Unlawfully Stamped Packages** in violation of **N.Y. Tax L. §§ 481(2)(a) & 4 and N.Y. Tax L. § 1814(c)(2)**, in that on or about February 5, 2013, in the County of Kings and elsewhere within the State of New York, and in the States of Delaware and Maryland, not being agents licensed by the Commissioner of the New York State Department of Taxation and Finance, did willfully possess or transport for the purpose of sale, thirty thousand or more cigarettes subject to the tax imposed pursuant to New York State Law in any unstamped or unlawfully stamped packages, and/or willfully sold or offered for sale thirty thousand or more cigarettes in any unstamped or unlawfully stamped packages.

PATTERN ACT #94

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu Saleem, each aiding the other and acting in concert, committed the crime of **Money Laundering in the Fourth Degree** in violation of **Penal Law § 470.05(2)(a)(i)**, in that on or about February 5, 2013, in the County of Kings and elsewhere within the State of New York, and in the States of Delaware and Maryland, knowing that one or more

monetary instruments, to wit, United States currency, represented the proceeds of criminal conduct, the defendants transported, transmitted, or transferred, or attempted to transport, transmit or transfer, on one or more occasions, monetary instruments which in fact represented the proceeds of specified criminal conduct, to wit, violation of N.Y. Tax L. §§ 481(2)(a) & 4, N.Y. Tax L. §§ 1814(a)(i) and (c)(2) and Enterprise Corruption, with intent to promote the carrying on of criminal conduct, and the total value of such monetary instrument or instruments exceeded ten thousand dollars.

PATTERN ACT #95

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu Saleem, each aiding the other and acting in concert, committed the crime of **Money Laundering in the Fourth Degree** in violation of **Penal Law § 470.05(1)(a)(i)(A)**, in that on or about February 5, 2013, in the County of Kings and elsewhere within the State of New York, and in the States of Delaware and Maryland, knowing that the property, to wit, United States currency, involved in one or more financial transactions represented the proceeds of criminal conduct, the defendants conducted one or more such financial transactions which in fact involved the proceeds of specified criminal conduct, to wit, violation of N.Y. Tax L. §§ 481(2)(a) & 4, N.Y. Tax L. §§ 1814(a)(i) and (c)(2) and Enterprise Corruption, with intent to promote the carrying on of criminal conduct, and the total value involved in such financial transaction or transactions exceeded five thousand dollars.

PATTERN ACT #96

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu Saleem, each aiding the other and acting in concert, committed the crime of **Attempt to Evade or Defeat Cigarette and Tobacco Products Tax** in violation of **N.Y. Tax L. §§ 481(2)(a) & 4 and N.Y. Tax L. § 1814(a)(i)**, in that on or about February 10, 2013, in the County of Kings and elsewhere within the State of New York, and in the States of Delaware and Maryland, did willfully attempt in any manner to evade or defeat the taxes imposed pursuant to New York State Tax Law or payment thereof on ten thousand or more cigarettes.

PATTERN ACT #97

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu Saleem, each aiding the other and acting in concert, committed the crime of **Possession or Transport for the Purpose of Sale, or Sale or Offering For Sale, of Thirty Thousand or More Cigarettes in Unstamped or Unlawfully Stamped Packages** in violation of **N.Y. Tax L. §§ 481(2)(a) & 4 and N.Y. Tax L. § 1814(c)(2)**, in that on or about February 10, 2013, in the County of Kings and elsewhere within the State of New York, and in the States of Delaware and Maryland, not being agents licensed by the Commissioner of the New York State Department of Taxation and Finance, did willfully possess or transport for the purpose of sale, thirty thousand or more cigarettes subject to the tax imposed pursuant to New York State Law in any unstamped or unlawfully

stamped packages, and/or willfully sold or offered for sale thirty thousand or more cigarettes in any unstamped or unlawfully stamped packages.

PATTERN ACT #98

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu Saleem, each aiding the other and acting in concert, committed the crime of **Money Laundering in the Fourth Degree** in violation of **Penal Law § 470.05(2)(a)(i)**, in that on or about February 10, 2013, in the County of Kings and elsewhere within the State of New York, and in the States of Delaware, Maryland and New Jersey, knowing that one or more monetary instruments, to wit, United States currency, represented the proceeds of criminal conduct, the defendants transported, transmitted, or transferred, or attempted to transport, transmit or transfer, on one or more occasions, monetary instruments which in fact represented the proceeds of specified criminal conduct, to wit, violation of N.Y. Tax L. §§ 481(2)(a) & 4, N.Y. Tax L. §§ 1814(a)(i) and (c)(2) and Enterprise Corruption, with intent to promote the carrying on of criminal conduct, and the total value of such monetary instrument or instruments exceeded ten thousand dollars.

PATTERN ACT #99

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu Saleem, each aiding the other and acting in concert, committed the crime of **Money Laundering in the Fourth Degree** in violation of **Penal Law § 470.05(1)(a)(i)(A)**, in that on or about February 10, 2013, in the County of Kings and elsewhere within the State of New York, and in the States of Delaware and Maryland, knowing that the

property, to wit, United States currency, involved in one or more financial transactions represented the proceeds of criminal conduct, the defendants conducted one or more such financial transactions which in fact involved the proceeds of specified criminal conduct, to wit, violation of N.Y. Tax L. §§ 481(2)(a) & 4, N.Y. Tax L. §§ 1814(a)(i) and (c)(2) and Enterprise Corruption, with intent to promote the carrying on of criminal conduct, and the total value involved in such financial transaction or transactions exceeded five thousand dollars.

PATTERN ACT #100

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Issa Sulieman, Ahmad Abdelaziz, a.k.a. Al Jaba'I, Ribhi Awawdeh and Mohamed Abed Alabed Awawdeh, a.k.a. Abu Samir, each aiding the other and acting in concert, committed the crime of **Attempt to Evade or Defeat Cigarette and Tobacco Products Tax** in violation of **N.Y. Tax L. §§ 481(2)(a) & 4 and N.Y. Tax L. § 1814(a)(i)**, in that on or about February 11, 2013, in the County of Kings, County of Bronx and elsewhere within the State of New York, and in the States of Delaware, Maryland and New Jersey, did willfully attempt in any manner to evade or defeat the taxes imposed pursuant to New York State Tax Law or payment thereof on ten thousand or more cigarettes.

PATTERN ACT #101

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu

Mahmoud, Issa Sulieman, Ahmad Abdelaziz, a.k.a. Al Jaba'I, Ribhi Awawdeh and Mohamed Abed Alabed Awawdeh, a.k.a. Abu Samir, each aiding the other and acting in concert, committed the crime of **Possession or Transport for the Purpose of Sale, or Sale or Offering For Sale, of Thirty Thousand or More Cigarettes in Unstamped or Unlawfully Stamped Packages** in violation of N.Y. Tax L. §§ 481(2)(a) & 4 and N.Y. Tax L. § 1814(c)(2), in that on or about February 11, 2013, in the County of Kings, County of Bronx and elsewhere within the State of New York, and in the States of Delaware, Maryland and New Jersey, not being agents licensed by the Commissioner of the New York State Department of Taxation and Finance, did willfully possess or transport for the purpose of sale, thirty thousand or more cigarettes subject to the tax imposed pursuant to New York State Law in any unstamped or unlawfully stamped packages, and/or willfully sold or offered for sale thirty thousand or more cigarettes in any unstamped or unlawfully stamped packages.

PATTERN ACT #102

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Issa Sulieman, Ahmad Abdelaziz, a.k.a. Al Jaba'I, Ribhi Awawdeh and Mohamed Abed Alabed Awawdeh, a.k.a. Abu Samir, each aiding the other and acting in concert, committed the crime of **Money Laundering in the Second Degree** in violation of **Penal Law § 470.15(2)(b)(i)**, in that on or about February 11, 2013, in the County of Kings, County of Bronx and elsewhere within the State of New York, and in the States of Delaware, Maryland and New Jersey, knowing that one or more monetary instruments, to wit, United States currency, represented the proceeds of specified criminal

conduct, the defendants transported, transmitted, or transferred, or attempted to transport, transmit or transfer, on one or more occasions, monetary instruments which in fact represented the proceeds of specified criminal conduct, to wit, violation of N.Y. Tax L. §§ 481(2)(a) & 4, N.Y. Tax L. §§ 1814(a)(i) and (c)(2) and Enterprise Corruption, from a place in any county in this state to or through a place outside that county or to a place in any county in this state from or through a place outside that county, with intent to promote the carrying on of specified criminal conduct, and the total value of such monetary instrument or instruments exceeded one hundred thousand dollars.

PATTERN ACT #103

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Issa Sulieman, Ahmad Abdelaziz, a.k.a. Al Jaba'I, Ribhi Awawdeh and Mohamed Abed Alabed Awawdeh, a.k.a. Abu Samir, each aiding the other and acting in concert, committed the crime of **Money Laundering in the Second Degree** in violation of **Penal Law § 470.15(1)(b)(i)(A)**, in that on or about February 11, 2013, in the County of Kings, County of Bronx and elsewhere within the State of New York, and in the States of Delaware, Maryland and New Jersey, knowing that the property, to wit, United States currency, involved in one or more financial transactions represented the proceeds of specified criminal conduct, the defendants conducted one or more such financial transactions which in fact involved the proceeds of specified criminal conduct, to wit, violation of N.Y. Tax L. §§ 481(2)(a) & 4, N.Y. Tax L. §§ 1814(a)(i) and (c)(2) and Enterprise Corruption, with intent to promote the carrying on of specified criminal

conduct, and the total value involved in such financial transaction or transactions exceeded one hundred thousand dollars.

PATTERN ACT #104

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu Saleem, each aiding the other and acting in concert, committed the crime of **Attempt to Evade or Defeat Cigarette and Tobacco Products Tax** in violation of **N.Y. Tax L. §§ 481(2)(a) & 4 and N.Y. Tax L. § 1814(a)(i)**, in that on or about February 16, 2013, in the County of Kings and elsewhere within the State of New York, and in the States of Delaware and Maryland, did willfully attempt in any manner to evade or defeat the taxes imposed pursuant to New York State Tax Law or payment thereof on ten thousand or more cigarettes.

PATTERN ACT #105

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu Saleem, each aiding the other and acting in concert, committed the crime of **Possession or Transport for the Purpose of Sale, or Sale or Offering For Sale, of Thirty Thousand or More Cigarettes in Unstamped or Unlawfully Stamped Packages** in violation of **N.Y. Tax L. §§ 481(2)(a) & 4 and N.Y. Tax L. § 1814(c)(2)**, in that on or about February 16, 2013, in the County of Kings and elsewhere within the State of New York, and in the States of Delaware and Maryland, not being agents licensed by the Commissioner of the New York State Department of Taxation and Finance, did willfully possess or transport for the purpose of sale, thirty thousand or more cigarettes subject to

the tax imposed pursuant to New York State Law in any unstamped or unlawfully stamped packages, and/or willfully sold or offered for sale thirty thousand or more cigarettes in any unstamped or unlawfully stamped packages.

PATTERN ACT #106

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu Saleem, each aiding the other and acting in concert, committed the crime of **Money Laundering in the Third Degree** in violation of **Penal Law § 470.10(2)(b)(i)**, in that on or about February 16, 2013, in the County of Kings and elsewhere within the State of New York, and in the States of Delaware and Maryland, knowing that one or more monetary instruments, to wit, United States currency, represented the proceeds of criminal conduct, the defendants transported, transmitted, or transferred, or attempted to transport, transmit or transfer, on one or more occasions, monetary instruments which in fact represented the proceeds of specified criminal conduct, to wit, violation of N.Y. Tax L. §§ 481(2)(a) & 4, N.Y. Tax L. §§ 1814(a)(i) and (c)(2) and Enterprise Corruption, from a place in any county in this state to or through a place outside that county or to a place in any county in this state from or through a place outside that county, with intent to promote the carrying on of criminal conduct, and the total value of such monetary instrument or instruments exceeded fifty thousand dollars.

PATTERN ACT #107

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu Saleem, each aiding the other and acting in concert, committed the crime of **Money**

Laundering in the Third Degree in violation of **Penal Law § 470.10(1)(b)(i)(A)**, in that on or about February 16, 2013, in the County of Kings and elsewhere within the State of New York, and in the States of Delaware and Maryland, knowing that the property, to wit, United States currency, involved in one or more financial transactions represented the proceeds of criminal conduct, the defendants conducted one or more such financial transactions which in fact involved the proceeds of specified criminal conduct, to wit, violation of N.Y. Tax L. §§ 481(2)(a) & 4, N.Y. Tax L. §§ 1814(a)(i) and (c)(2) and Enterprise Corruption, with intent to promote the carrying on of criminal conduct, and the total value involved in such financial transaction or transactions exceeded fifty thousand dollars.

PATTERN ACT #108

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu Saleem, each aiding the other and acting in concert, committed the crime of **Attempt to Evade or Defeat Cigarette and Tobacco Products Tax** in violation of **N.Y. Tax L. §§ 481(2)(a) & 4 and N.Y. Tax L. § 1814(a)(i)**, in that on or about February 17, 2013, in the County of Kings and elsewhere within the State of New York, and in the States of Delaware and Maryland, did willfully attempt in any manner to evade or defeat the taxes imposed pursuant to New York State Tax Law or payment thereof on ten thousand or more cigarettes.

PATTERN ACT #109

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu

Saleem, each aiding the other and acting in concert, committed the crime of **Possession or Transport for the Purpose of Sale, or Sale or Offering For Sale, of Thirty Thousand or More Cigarettes in Unstamped or Unlawfully Stamped Packages** in violation of **N.Y. Tax L. §§ 481(2)(a) & 4 and N.Y. Tax L. § 1814(c)(2)**, in that on or about February 17, 2013, in the County of Kings and elsewhere within the State of New York, and in the States of Delaware and Maryland, not being agents licensed by the Commissioner of the New York State Department of Taxation and Finance, did willfully possess or transport for the purpose of sale, thirty thousand or more cigarettes subject to the tax imposed pursuant to New York State Law in any unstamped or unlawfully stamped packages, and/or willfully sold or offered for sale thirty thousand or more cigarettes in any unstamped or unlawfully stamped packages.

PATTERN ACT #110

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu Saleem, each aiding the other and acting in concert, committed the crime of **Money Laundering in the Third Degree** in violation of **Penal Law § 470.10(2)(b)(i)**, in that on or about February 17, 2013, in the County of Kings and elsewhere within the State of New York, and in the States of Delaware and Maryland, knowing that one or more monetary instruments, to wit, United States currency, represented the proceeds of criminal conduct, the defendants transported, transmitted, or transferred, or attempted to transport, transmit or transfer, on one or more occasions, monetary instruments which in fact represented the proceeds of specified criminal conduct, to wit, violation of N.Y. Tax L. §§ 481(2)(a) & 4, N.Y. Tax L. §§ 1814(a)(i) and (c)(2) and Enterprise Corruption,

from a place in any county in this state to or through a place outside that county or to a place in any county in this state from or through a place outside that county, with intent to promote the carrying on of criminal conduct, and the total value of such monetary instrument or instruments exceeded fifty thousand dollars.

PATTERN ACT #111

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu Saleem, each aiding the other and acting in concert, committed the crime of **Money Laundering in the Third Degree** in violation of **Penal Law § 470.10(1)(b)(i)(A)**, in that on or about February 17, 2013, in the County of Kings and elsewhere within the State of New York, and in the States of Delaware and Maryland, knowing that the property, to wit, United States currency, involved in one or more financial transactions represented the proceeds of criminal conduct, the defendants conducted one or more such financial transactions which in fact involved the proceeds of specified criminal conduct, to wit, violation of N.Y. Tax L. §§ 481(2)(a) & 4, N.Y. Tax L. §§ 1814(a)(i) and (c)(2) and Enterprise Corruption, with intent to promote the carrying on of criminal conduct, and the total value involved in such financial transaction or transactions exceeded fifty thousand dollars.

PATTERN ACT #112

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu Saleem, each aiding the other and acting in concert, committed the crime of **Attempt to Evade or Defeat Cigarette and Tobacco Products Tax** in violation of **N.Y. Tax L. §§**

481(2)(a) & 4 and N.Y. Tax L. § 1814(a)(i), in that on or about February 19, 2013, in the County of Kings and elsewhere within the State of New York, and in the States of Delaware and Maryland, did willfully attempt in any manner to evade or defeat the taxes imposed pursuant to New York State Tax Law or payment thereof on ten thousand or more cigarettes.

PATTERN ACT #113

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu Saleem, each aiding the other and acting in concert, committed the crime of **Possession or Transport for the Purpose of Sale, or Sale or Offering For Sale, of Thirty Thousand or More Cigarettes in Unstamped or Unlawfully Stamped Packages** in violation of **N.Y. Tax L. §§ 481(2)(a) & 4 and N.Y. Tax L. § 1814(c)(2)**, in that on or about February 19, 2013, in the County of Kings and elsewhere within the State of New York, and in the States of Delaware and Maryland, not being agents licensed by the Commissioner of the New York State Department of Taxation and Finance, did willfully possess or transport for the purpose of sale, thirty thousand or more cigarettes subject to the tax imposed pursuant to New York State Law in any unstamped or unlawfully stamped packages, and/or willfully sold or offered for sale thirty thousand or more cigarettes in any unstamped or unlawfully stamped packages.

PATTERN ACT #114

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu Saleem, each aiding the other and acting in concert, committed the crime of **Money**

Laundering in the Third Degree in violation of **Penal Law § 470.10(2)(b)(i)**, in that on or about February 19, 2013, in the County of Kings and elsewhere within the State of New York, and in the States of Delaware and Maryland, knowing that one or more monetary instruments, to wit, United States currency, represented the proceeds of criminal conduct, the defendants transported, transmitted, or transferred, or attempted to transport, transmit or transfer, on one or more occasions, monetary instruments which in fact represented the proceeds of specified criminal conduct, to wit, violation of N.Y. Tax L. §§ 481(2)(a) & 4, N.Y. Tax L. §§ 1814(a)(i) and (c)(2) and Enterprise Corruption, from a place in any county in this state to or through a place outside that county or to a place in any county in this state from or through a place outside that county, with intent to promote the carrying on of criminal conduct, and the total value of such monetary instrument or instruments exceeded fifty thousand dollars.

PATTERN ACT #115

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu Saleem, each aiding the other and acting in concert, committed the crime of **Money Laundering in the Third Degree** in violation of **Penal Law § 470.10(1)(b)(i)(A)**, in that on or about February 19, 2013, in the County of Kings and elsewhere within the State of New York, and in the States of Delaware and Maryland, knowing that the property, to wit, United States currency, involved in one or more financial transactions represented the proceeds of criminal conduct, the defendants conducted one or more such financial transactions which in fact involved the proceeds of specified criminal conduct, to wit, violation of N.Y. Tax L. §§ 481(2)(a) & 4, N.Y. Tax L. §§ 1814(a)(i) and (c)(2) and

Enterprise Corruption, with intent to promote the carrying on of criminal conduct, and the total value involved in such financial transaction or transactions exceeded fifty thousand dollars.

PATTERN ACT #116

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu Saleem, each aiding the other and acting in concert, committed the crime of **Attempt to Evade or Defeat Cigarette and Tobacco Products Tax** in violation of **N.Y. Tax L. §§ 481(2)(a) & 4 and N.Y. Tax L. § 1814(a)(i)**, in that on or about February 22, 2013, in the County of Kings and elsewhere within the State of New York, and in the States of Delaware and Maryland, did willfully attempt in any manner to evade or defeat the taxes imposed pursuant to New York State Tax Law or payment thereof on ten thousand or more cigarettes.

PATTERN ACT #117

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu Saleem, each aiding the other and acting in concert, committed the crime of **Possession or Transport for the Purpose of Sale, or Sale or Offering For Sale, of Thirty Thousand or More Cigarettes in Unstamped or Unlawfully Stamped Packages** in violation of **N.Y. Tax L. §§ 481(2)(a) & 4 and N.Y. Tax L. § 1814(c)(2)**, in that on or about February 22, 2013, in the County of Kings and elsewhere within the State of New York, and in the States of Delaware and Maryland, not being agents licensed by the Commissioner of the New York State Department of Taxation and Finance, did willfully

possess or transport for the purpose of sale, thirty thousand or more cigarettes subject to the tax imposed pursuant to New York State Law in any unstamped or unlawfully stamped packages, and/or willfully sold or offered for sale thirty thousand or more cigarettes in any unstamped or unlawfully stamped packages.

PATTERN ACT #118

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu Saleem, each aiding the other and acting in concert, committed the crime of **Money Laundering in the Third Degree** in violation of **Penal Law § 470.10(2)(b)(i)**, in that on or about February 22, 2013, in the County of Kings and elsewhere within the State of New York, and in the States of Delaware and Maryland, knowing that one or more monetary instruments, to wit, United States currency, represented the proceeds of criminal conduct, the defendants transported, transmitted, or transferred, or attempted to transport, transmit or transfer, on one or more occasions, monetary instruments which in fact represented the proceeds of specified criminal conduct, to wit, violation of N.Y. Tax L. §§ 481(2)(a) & 4, N.Y. Tax L. §§ 1814(a)(i) and (c)(2) and Enterprise Corruption, from a place in any county in this state to or through a place outside that county or to a place in any county in this state from or through a place outside that county, with intent to promote the carrying on of criminal conduct, and the total value of such monetary instrument or instruments exceeded fifty thousand dollars.

PATTERN ACT #119

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu

Saleem, each aiding the other and acting in concert, committed the crime of **Money Laundering in the Third Degree** in violation of **Penal Law § 470.10(1)(b)(i)(A)**, in that on or about February 22, 2013, in the County of Kings and elsewhere within the State of New York, and in the States of Delaware and Maryland, knowing that the property, to wit, United States currency, involved in one or more financial transactions represented the proceeds of criminal conduct, the defendants conducted one or more such financial transactions which in fact involved the proceeds of specified criminal conduct, to wit, violation of N.Y. Tax L. §§ 481(2)(a) & 4, N.Y. Tax L. §§ 1814(a)(i) and (c)(2) and Enterprise Corruption, with intent to promote the carrying on of criminal conduct, and the total value involved in such financial transaction or transactions exceeded fifty thousand dollars.

PATTERN ACT #120

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu Saleem, each aiding the other and acting in concert, committed the crime of **Attempt to Evade or Defeat Cigarette and Tobacco Products Tax** in violation of **N.Y. Tax L. §§ 481(2)(a) & 4 and N.Y. Tax L. § 1814(a)(i)**, in that on or about February 23, 2013, in the County of Kings and elsewhere within the State of New York, and in the States of Delaware and Maryland, did willfully attempt in any manner to evade or defeat the taxes imposed pursuant to New York State Tax Law or payment thereof on ten thousand or more cigarettes.

PATTERN ACT #121

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu Saleem, each aiding the other and acting in concert, committed the crime of **Possession or Transport for the Purpose of Sale, or Sale or Offering For Sale, of Thirty Thousand or More Cigarettes in Unstamped or Unlawfully Stamped Packages** in violation of **N.Y. Tax L. §§ 481(2)(a) & 4 and N.Y. Tax L. § 1814(c)(2)**, in that on or about February 23, 2013, in the County of Kings and elsewhere within the State of New York, and in the States of Delaware and Maryland, not being agents licensed by the Commissioner of the New York State Department of Taxation and Finance, did willfully possess or transport for the purpose of sale, thirty thousand or more cigarettes subject to the tax imposed pursuant to New York State Law in any unstamped or unlawfully stamped packages, and/or willfully sold or offered for sale thirty thousand or more cigarettes in any unstamped or unlawfully stamped packages.

PATTERN ACT #122

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu Saleem, each aiding the other and acting in concert, committed the crime of **Money Laundering in the Third Degree** in violation of **Penal Law § 470.10(2)(b)(i)**, in that on or about February 23, 2013, in the County of Kings and elsewhere within the State of New York, and in the States of Delaware and Maryland, knowing that one or more monetary instruments, to wit, United States currency, represented the proceeds of criminal conduct, the defendants transported, transmitted, or transferred, or attempted to

transport, transmit or transfer, on one or more occasions, monetary instruments which in fact represented the proceeds of specified criminal conduct, to wit, violation of N.Y. Tax L. §§ 481(2)(a) & 4, N.Y. Tax L. §§ 1814(a)(i) and (c)(2) and Enterprise Corruption, from a place in any county in this state to or through a place outside that county or to a place in any county in this state from or through a place outside that county, with intent to promote the carrying on of criminal conduct, and the total value of such monetary instrument or instruments exceeded fifty thousand dollars.

PATTERN ACT #123

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu Saleem, each aiding the other and acting in concert, committed the crime of **Money Laundering in the Third Degree** in violation of **Penal Law § 470.10(1)(b)(i)(A)**, in that on or about February 23, 2013, in the County of Kings and elsewhere within the State of New York, and in the States of Delaware and Maryland, knowing that the property, to wit, United States currency, involved in one or more financial transactions represented the proceeds of criminal conduct, the defendants conducted one or more such financial transactions which in fact involved the proceeds of specified criminal conduct, to wit, violation of N.Y. Tax L. §§ 481(2)(a) & 4, N.Y. Tax L. §§ 1814(a)(i) and (c)(2) and Enterprise Corruption, with intent to promote the carrying on of criminal conduct, and the total value involved in such financial transaction or transactions exceeded fifty thousand dollars.

PATTERN ACT #124

Defendants Basel Ramadan, a.k.a. Abu Salah, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu Saleem, each aiding the other and acting in concert, committed the crime of **Attempt to Evade or Defeat Cigarette and Tobacco Products Tax** in violation of **N.Y. Tax L. §§ 481(2)(a) & 4 and N.Y. Tax L. § 1814(a)(i)**, in that on or about February 24, 2013, in the County of Kings and elsewhere within the State of New York, and in the States of Delaware and Maryland, did willfully attempt in any manner to evade or defeat the taxes imposed pursuant to New York State Tax Law or payment thereof on ten thousand or more cigarettes.

PATTERN ACT #125

Defendants Basel Ramadan, a.k.a. Abu Salah, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu Saleem, each aiding the other and acting in concert, committed the crime of **Possession or Transport for the Purpose of Sale, or Sale or Offering For Sale, of Thirty Thousand or More Cigarettes in Unstamped or Unlawfully Stamped Packages** in violation of **N.Y. Tax L. §§ 481(2)(a) & 4 and N.Y. Tax L. § 1814(c)(2)**, in that on or about February 24, 2013, in the County of Kings and elsewhere within the State of New York, and in the States of Delaware and Maryland, not being agents licensed by the Commissioner of the New York State Department of Taxation and Finance, did willfully possess or transport for the purpose of sale, thirty thousand or more cigarettes subject to the tax imposed pursuant to New York State Law in any unstamped or unlawfully stamped packages, and/or willfully sold or offered for sale thirty thousand or more cigarettes in any unstamped or unlawfully stamped packages.

PATTERN ACT #126

Defendants Basel Ramadan, a.k.a. Abu Salah, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu Saleem, each aiding the other and acting in concert, committed the crime of **Money Laundering in the Fourth Degree** in violation of **Penal Law § 470.05(2)(a)(i)**, in that on or about February 24, 2013, in the County of Kings and elsewhere within the State of New York, and in the States of Delaware and Maryland, knowing that one or more monetary instruments, to wit, United States currency, represented the proceeds of criminal conduct, the defendants transported, transmitted, or transferred, or attempted to transport, transmit or transfer, on one or more occasions, monetary instruments which in fact represented the proceeds of specified criminal conduct, to wit, violation of N.Y. Tax L. §§ 481(2)(a) & 4, N.Y. Tax L. §§ 1814(a)(i) and (c)(2) and Enterprise Corruption, with intent to promote the carrying on of criminal conduct, and the total value of such monetary instrument or instruments exceeded ten thousand dollars.

PATTERN ACT #127

Defendants Basel Ramadan, a.k.a. Abu Salah, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu Saleem, each aiding the other and acting in concert, committed the crime of **Money Laundering in the Fourth Degree** in violation of **Penal Law § 470.05(1)(a)(i)(A)**, in that on or about February 24, 2013, in the County of Kings and elsewhere within the State of New York, and in the States of Delaware and Maryland, knowing that the property, to wit, United States currency, involved in one or more financial transactions represented the proceeds of criminal conduct, the defendants conducted one or more such financial transactions which in fact

involved the proceeds of specified criminal conduct, to wit, violation of N.Y. Tax L. §§ 481(2)(a) & 4, N.Y. Tax L. §§ 1814(a)(i) and (c)(2) and Enterprise Corruption, with intent to promote the carrying on of criminal conduct, and the total value involved in such financial transaction or transactions exceeded five thousand dollars.

PATTERN ACT #128

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu Saleem, each aiding the other and acting in concert, committed the crime of **Attempt to Evade or Defeat Cigarette and Tobacco Products Tax** in violation of **N.Y. Tax L. §§ 481(2)(a) & 4 and N.Y. Tax L. § 1814(a)(i)**, in that on or about February 28, 2013, in the County of Kings and elsewhere within the State of New York, and in the States of Delaware and, Maryland, did willfully attempt in any manner to evade or defeat the taxes imposed pursuant to New York State Tax Law or payment thereof on ten thousand or more cigarettes.

PATTERN ACT #129

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu Saleem, each aiding the other and acting in concert, committed the crime of **Possession or Transport for the Purpose of Sale, or Sale or Offering For Sale, of Thirty Thousand or More Cigarettes in Unstamped or Unlawfully Stamped Packages** in violation of **N.Y. Tax L. §§ 481(2)(a) & 4 and N.Y. Tax L. § 1814(c)(2)**, in that on or about February 28, 2013, in the County of Kings and elsewhere within the State of New York, and in the States of Delaware and Maryland, not being agents licensed by the

Commissioner of the New York State Department of Taxation and Finance, did willfully possess or transport for the purpose of sale, thirty thousand or more cigarettes subject to the tax imposed pursuant to New York State Law in any unstamped or unlawfully stamped packages, and/or willfully sold or offered for sale thirty thousand or more cigarettes in any unstamped or unlawfully stamped packages.

PATTERN ACT #130

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu Saleem, each aiding the other and acting in concert, committed the crime of **Money Laundering in the Third Degree** in violation of **Penal Law § 470.10(2)(b)(i)**, in that on or about February 28, 2013, in the County of Kings and elsewhere within the State of New York, and in the States of Delaware and Maryland, knowing that one or more monetary instruments, to wit, United States currency, represented the proceeds of criminal conduct, the defendants transported, transmitted, or transferred, or attempted to transport, transmit or transfer, on one or more occasions, monetary instruments which in fact represented the proceeds of specified criminal conduct, to wit, violation of N.Y. Tax L. §§ 481(2)(a) & 4, N.Y. Tax L. §§ 1814(a)(i) and (c)(2) and Enterprise Corruption, from a place in any county in this state to or through a place outside that county or to a place in any county in this state from or through a place outside that county, with intent to promote the carrying on of criminal conduct, and the total value of such monetary instrument or instruments exceeded fifty thousand dollars.

PATTERN ACT #131

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu Saleem, each aiding the other and acting in concert, committed the crime of **Money Laundering in the Third Degree** in violation of **Penal Law § 470.10(1)(b)(i)(A)**, in that on or about February 28, 2013, in the County of Kings and elsewhere within the State of New York, and in the States of Delaware and Maryland, knowing that the property, to wit, United States currency, involved in one or more financial transactions represented the proceeds of criminal conduct, the defendants conducted one or more such financial transactions which in fact involved the proceeds of specified criminal conduct, to wit, violation of N.Y. Tax L. §§ 481(2)(a) & 4, N.Y. Tax L. §§ 1814(a)(i) and (c)(2) and Enterprise Corruption, with intent to promote the carrying on of criminal conduct, and the total value involved in such financial transaction or transactions exceeded fifty thousand dollars.

PATTERN ACT #132

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu Saleem, each aiding the other and acting in concert, committed the crime of **Attempt to Evade or Defeat Cigarette and Tobacco Products Tax** in violation of **N.Y. Tax L. §§ 481(2)(a) & 4 and N.Y. Tax L. § 1814(a)(i)**, in that on or about March 2, 2013, in the County of Kings and elsewhere within the State of New York, and in the States of Delaware and Maryland, did willfully attempt in any manner to evade or defeat the taxes imposed pursuant to New York State Tax Law or payment thereof on ten thousand or more cigarettes.

PATTERN ACT #133

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu Saleem, each aiding the other and acting in concert, committed the crime of **Possession or Transport for the Purpose of Sale, or Sale or Offering For Sale, of Thirty Thousand or More Cigarettes in Unstamped or Unlawfully Stamped Packages** in violation of **N.Y. Tax L. §§ 481(2)(a) & 4 and N.Y. Tax L. § 1814(c)(2)**, in that on or about March 2, 2013, in the County of Kings and elsewhere within the State of New York, and in the States of Delaware and Maryland, not being agents licensed by the Commissioner of the New York State Department of Taxation and Finance, did willfully possess or transport for the purpose of sale, thirty thousand or more cigarettes subject to the tax imposed pursuant to New York State Law in any unstamped or unlawfully stamped packages, and/or willfully sold or offered for sale thirty thousand or more cigarettes in any unstamped or unlawfully stamped packages.

PATTERN ACT #134

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu Saleem, each aiding the other and acting in concert, committed the crime of **Money Laundering in the Third Degree** in violation of **Penal Law § 470.10(2)(b)(i)**, in that on or about March 2, 2013, in the County of Kings and elsewhere within the State of New York, and in the States of Delaware and Maryland, knowing that one or more monetary instruments, to wit, United States currency, represented the proceeds of criminal conduct, the defendants transported, transmitted, or transferred, or attempted to transport, transmit

or transfer, on one or more occasions, monetary instruments which in fact represented the proceeds of specified criminal conduct, to wit, violation of N.Y. Tax L. §§ 481(2)(a) & 4, N.Y. Tax L. §§ 1814(a)(i) and (c)(2) and Enterprise Corruption, from a place in any county in this state to or through a place outside that county or to a place in any county in this state from or through a place outside that county, with intent to promote the carrying on of criminal conduct, and the total value of such monetary instrument or instruments exceeded fifty thousand dollars.

PATTERN ACT #135

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu Saleem, each aiding the other and acting in concert, committed the crime of **Money Laundering in the Third Degree** in violation of **Penal Law § 470.10(1)(b)(i)(A)**, in that on or about March 2, 2013, in the County of Kings and elsewhere within the State of New York, and in the States of Delaware and Maryland, knowing that the property, to wit, United States currency, involved in one or more financial transactions represented the proceeds of criminal conduct, the defendants conducted one or more such financial transactions which in fact involved the proceeds of specified criminal conduct, to wit, violation of N.Y. Tax L. §§ 481(2)(a) & 4, N.Y. Tax L. §§ 1814(a)(i) and (c)(2) and Enterprise Corruption, with intent to promote the carrying on of criminal conduct, and the total value involved in such financial transaction or transactions exceeded fifty thousand dollars.

PATTERN ACT #136

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu Saleem, each aiding the other and acting in concert, committed the crime of **Attempt to Evade or Defeat Cigarette and Tobacco Products Tax** in violation of **N.Y. Tax L. §§ 481(2)(a) & 4 and N.Y. Tax L. § 1814(a)(i)**, in that on or about March 2, 2013, in the County of Kings and elsewhere within the State of New York, and in the States of Delaware and Maryland, did willfully attempt in any manner to evade or defeat the taxes imposed pursuant to New York State Tax Law or payment thereof on ten thousand or more cigarettes.

PATTERN ACT #137

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu Saleem, each aiding the other and acting in concert, committed the crime of **Possession or Transport for the Purpose of Sale, or Sale or Offering For Sale, of Thirty Thousand or More Cigarettes in Unstamped or Unlawfully Stamped Packages** in violation of **N.Y. Tax L. §§ 481(2)(a) & 4 and N.Y. Tax L. § 1814(c)(2)**, in that on or about March 2, 2013, in the County of Kings and elsewhere within the State of New York, and in the States of Delaware and Maryland, not being agents licensed by the Commissioner of the New York State Department of Taxation and Finance, did willfully possess or transport for the purpose of sale, thirty thousand or more cigarettes subject to the tax imposed pursuant to New York State Law in any unstamped or unlawfully stamped packages, and/or willfully sold or offered for sale thirty thousand or more cigarettes in any unstamped or unlawfully stamped packages.

PATTERN ACT #138

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu Saleem, each aiding the other and acting in concert, committed the crime of **Money Laundering in the Third Degree** in violation of **Penal Law § 470.10(2)(b)(i)**, in that on or about March 2, 2013, in the County of Kings and elsewhere within the State of New York, and in the States of Delaware and Maryland, knowing that one or more monetary instruments, to wit, United States currency, represented the proceeds of criminal conduct, the defendants transported, transmitted, or transferred, or attempted to transport, transmit or transfer, on one or more occasions, monetary instruments which in fact represented the proceeds of specified criminal conduct, to wit, violation of N.Y. Tax L. §§ 481(2)(a) & 4, N.Y. Tax L. §§ 1814(a)(i) and (c)(2) and Enterprise Corruption, from a place in any county in this state to or through a place outside that county or to a place in any county in this state from or through a place outside that county, with intent to promote the carrying on of criminal conduct, and the total value of such monetary instrument or instruments exceeded fifty thousand dollars.

PATTERN ACT #139

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu Saleem, each aiding the other and acting in concert, committed the crime of **Money Laundering in the Third Degree** in violation of **Penal Law § 470.10(1)(b)(i)(A)**, in that on or about March 2, 2013, in the County of Kings and elsewhere within the State of New York, and in the States of Delaware and Maryland, knowing that the property, to

wit, United States currency, involved in one or more financial transactions represented the proceeds of criminal conduct, the defendants conducted one or more such financial transactions which in fact involved the proceeds of specified criminal conduct, to wit, violation of N.Y. Tax L. §§ 481(2)(a) & 4, N.Y. Tax L. §§ 1814(a)(i) and (c)(2) and Enterprise Corruption, with intent to promote the carrying on of criminal conduct, and the total value involved in such financial transaction or transactions exceeded fifty thousand dollars.

PATTERN ACT #140

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu Saleem, each aiding the other and acting in concert, committed the crime of **Attempt to Evade or Defeat Cigarette and Tobacco Products Tax** in violation of N.Y. Tax L. §§ 481(2)(a) & 4 and N.Y. Tax L. § 1814(a)(i), in that on or about March 14, 2013, in the County of Kings and elsewhere within the State of New York, and in the States of Delaware and Maryland, did willfully attempt in any manner to evade or defeat the taxes imposed pursuant to New York State Tax Law or payment thereof on ten thousand or more cigarettes.

PATTERN ACT #141

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu Saleem, each aiding the other and acting in concert, committed the crime of **Possession or Transport for the Purpose of Sale, or Sale or Offering For Sale, of Thirty Thousand or More Cigarettes in Unstamped or Unlawfully Stamped Packages** in

violation of **N.Y. Tax L. §§ 481(2)(a) & 4 and N.Y. Tax L. § 1814(c)(2)**, in that on or about March 14, 2013, in the County of Kings and elsewhere within the State of New York, and in the States of Delaware and Maryland, not being agents licensed by the Commissioner of the New York State Department of Taxation and Finance, did willfully possess or transport for the purpose of sale thirty thousand or more cigarettes subject to the tax imposed pursuant to New York State Law in any unstamped or unlawfully stamped packages, and/or willfully sold or offered for sale thirty thousand or more cigarettes in any unstamped or unlawfully stamped packages.

PATTERN ACT #142

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu Saleem, each aiding the other and acting in concert, committed the crime of **Money Laundering in the Fourth Degree** in violation of **Penal Law § 470.05(2)(a)(i)**, in that on or about March 14, 2013, in the County of Kings and elsewhere within the State of New York, and in the States of Delaware and Maryland, knowing that one or more monetary instruments, to wit, United States currency, represented the proceeds of criminal conduct, the defendants transported, transmitted, or transferred, or attempted to transport, transmit or transfer, on one or more occasions, monetary instruments which in fact represented the proceeds of specified criminal conduct, to wit, violation of N.Y. Tax L. §§ 481(2)(a) & 4, N.Y. Tax L. §§ 1814(a)(i) and (c)(2) and Enterprise Corruption, with intent to promote the carrying on of criminal conduct, and the total value of such monetary instrument or instruments exceeded ten thousand dollars.

PATTERN ACT #143

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu Saleem, each aiding the other and acting in concert, committed the crime of **Money Laundering in the Fourth Degree** in violation of **Penal Law § 470.05(1)(a)(i)(A)**, in that on or about March 14, 2013, in the County of Kings and elsewhere within the State of New York, and in the States of Delaware and Maryland, knowing that the property, to wit, United States currency, involved in one or more financial transactions represented the proceeds of criminal conduct, the defendants conducted one or more such financial transactions which in fact involved the proceeds of specified criminal conduct, to wit, violation of N.Y. Tax L. §§ 481(2)(a) & 4, N.Y. Tax L. §§ 1814(a)(i) and (c)(2) and Enterprise Corruption, with intent to promote the carrying on of criminal conduct, and the total value involved in such financial transaction or transactions exceeded five thousand dollars.

PATTERN ACT #144

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu Saleem, each aiding the other and acting in concert, committed the crime of **Possession or Transport for the Purpose of Sale, or Sale or Offering For Sale, of Thirty Thousand or More Cigarettes in Unstamped or Unlawfully Stamped Packages** in violation of **N.Y. Tax L. §§ 481(2)(a) & 4 and N.Y. Tax L. § 1814(c)(2)**, in that on or about March 15, 2013, in the County of Kings and elsewhere within the State of New York, and in the States of Delaware and Maryland, not being agents licensed by the

Commissioner of the New York State Department of Taxation and Finance, did willfully possess or transport for the purpose of sale, thirty thousand or more cigarettes subject to the tax imposed pursuant to New York State Law in any unstamped or unlawfully stamped packages, and/or willfully sold or offered for sale thirty thousand or more cigarettes in any unstamped or unlawfully stamped packages.

PATTERN ACT #145

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu Saleem, each aiding the other and acting in concert, committed the crime of **Attempt to Evade or Defeat Cigarette and Tobacco Products Tax** in violation of **N.Y. Tax L. §§ 481(2)(a) & 4 and N.Y. Tax L. § 1814(a)(i)**, in that on or about March 15, 2013, in the County of Kings and elsewhere within the State of New York, and in the States of Delaware and Maryland, did willfully attempt in any manner to evade or defeat the taxes imposed pursuant to New York State Tax Law or payment thereof on ten thousand or more cigarettes.

PATTERN ACT #146

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu Saleem, each aiding the other and acting in concert, committed the crime of **Possession or Transport for the Purpose of Sale, or Sale or Offering For Sale, of Ten Thousand or More Cigarettes in Unstamped or Unlawfully Stamped Packages** in violation of **N.Y. Tax L. §§ 481(2)(a) & 4 and N.Y. Tax L. § 1814(c)(1)**, in that on or about March 15, 2013, in the County of Kings and elsewhere within the State of New York, and in the

States of Delaware and Maryland, not being agents licensed by the Commissioner of the New York State Department of Taxation and Finance, did willfully possess or transport for the purpose of sale, ten thousand or more cigarettes subject to the tax imposed pursuant to New York State Law in any unstamped or unlawfully stamped packages, and/or willfully sold or offered for sale ten thousand or more cigarettes in any unstamped or unlawfully stamped packages.

PATTERN ACT #147

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu Saleem, each aiding the other and acting in concert, committed the crime of **Attempt to Evade or Defeat Cigarette and Tobacco Products Tax** in violation of **N.Y. Tax L. §§ 481(2)(a) & 4 and N.Y. Tax L. § 1814(a)(i)**, in that on or about March 21, 2013, in the County of Kings and elsewhere within the State of New York, and in the States of Delaware and Maryland, did willfully attempt in any manner to evade or defeat the taxes imposed pursuant to New York State Tax Law or payment thereof on ten thousand or more cigarettes.

PATTERN ACT #148

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu Saleem, each aiding the other and acting in concert, committed the crime of **Possession or Transport for the Purpose of Sale, or Sale or Offering For Sale, of Thirty Thousand or More Cigarettes in Unstamped or Unlawfully Stamped Packages** in violation of **N.Y. Tax L. §§ 481(2)(a) & 4 and N.Y. Tax L. § 1814(c)(2)**, in that on or

about March 21, 2013, in the County of Kings and elsewhere within the State of New York, and in the States of Delaware and Maryland, not being agents licensed by the Commissioner of the New York State Department of Taxation and Finance, did willfully possess or transport for the purpose of sale, thirty thousand or more cigarettes subject to the tax imposed pursuant to New York State Law in any unstamped or unlawfully stamped packages, and/or willfully sold or offered for sale thirty thousand or more cigarettes in any unstamped or unlawfully stamped packages.

PATTERN ACT #149

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu Saleem, each aiding the other and acting in concert, committed the crime of **Money Laundering in the Third Degree** in violation of **Penal Law § 470.10(2)(b)(i)**, in that on or about March 21, 2013, in the County of Kings and elsewhere within the State of New York, and in the States of Delaware and Maryland, knowing that one or more monetary instruments, to wit, United States currency, represented the proceeds of criminal conduct, the defendants transported, transmitted, or transferred, or attempted to transport, transmit or transfer, on one or more occasions, monetary instruments which in fact represented the proceeds of specified criminal conduct, to wit, violation of N.Y. Tax L. §§ 481(2)(a) & 4, N.Y. Tax L. §§ 1814(a)(i) and (c)(2) and Enterprise Corruption, from a place in any county in this state to or through a place outside that county or to a place in any county in this state from or through a place outside that county, with intent to promote the carrying on of criminal conduct, and the total value of such monetary instrument or instruments exceeded fifty thousand dollars.

PATTERN ACT #150

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu Saleem, each aiding the other and acting in concert, committed the crime of **Money Laundering in the Third Degree** in violation of **Penal Law § 470.10(1)(b)(i)(A)**, in that on or about March 21, 2013, in the County of Kings and elsewhere within the State of New York, and in the States of Delaware and Maryland, knowing that the property, to wit, United States currency, involved in one or more financial transactions represented the proceeds of criminal conduct, the defendants conducted one or more such financial transactions which in fact involved the proceeds of specified criminal conduct, to wit, violation of N.Y. Tax L. §§ 481(2)(a) & 4, N.Y. Tax L. §§ 1814(a)(i) and (c)(2) and Enterprise Corruption, with intent to promote the carrying on of criminal conduct, and the total value involved in such financial transaction or transactions exceeded fifty thousand dollars.

PATTERN ACT #151

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu Saleem, each aiding the other and acting in concert, committed the crime of **Attempt to Evade or Defeat Cigarette and Tobacco Products Tax** in violation of **N.Y. Tax L. §§ 481(2)(a) & 4 and N.Y. Tax L. § 1814(a)(i)**, in that on or about March 22, 2013, in the County of Kings and elsewhere within the State of New York, and in the States of Delaware and Maryland, did willfully attempt in any manner to evade or defeat the taxes

imposed pursuant to New York State Tax Law or payment thereof on ten thousand or more cigarettes.

PATTERN ACT #152

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu Saleem, each aiding the other and acting in concert, committed the crime of **Possession or Transport for the Purpose of Sale, or Sale or Offering For Sale, of Thirty Thousand or More Cigarettes in Unstamped or Unlawfully Stamped Packages** in violation of **N.Y. Tax L. §§ 481(2)(a) & 4 and N.Y. Tax L. § 1814(c)(2)**, in that on or about March 22, 2013, in the County of Kings and elsewhere within the State of New York, and in the States of Delaware and Maryland, not being agents licensed by the Commissioner of the New York State Department of Taxation and Finance, did willfully possess or transport for the purpose of sale, thirty thousand or more cigarettes subject to the tax imposed pursuant to New York State Law in any unstamped or unlawfully stamped packages, and/or willfully sold or offered for sale thirty thousand or more cigarettes in any unstamped or unlawfully stamped packages.

PATTERN ACT #153

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu Saleem, each aiding the other and acting in concert, committed the crime of **Money Laundering in the Third Degree** in violation of **Penal Law § 470.10(2)(b)(i)**, in that on or about March 22, 2013, in the County of Kings and elsewhere within the State of New York, and in the States of Delaware and Maryland, knowing that one or more monetary

instruments, to wit, United States currency, represented the proceeds of criminal conduct, the defendants transported, transmitted, or transferred, or attempted to transport, transmit or transfer, on one or more occasions, monetary instruments which in fact represented the proceeds of specified criminal conduct, to wit, violation of N.Y. Tax L. §§ 481(2)(a) & 4, N.Y. Tax L. §§ 1814(a)(i) and (c)(2) and Enterprise Corruption, from a place in any county in this state to or through a place outside that county or to a place in any county in this state from or through a place outside that county, with intent to promote the carrying on of criminal conduct, and the total value of such monetary instrument or instruments exceeded fifty thousand dollars.

PATTERN ACT #154

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu Saleem, each aiding the other and acting in concert, committed the crime of **Money Laundering in the Third Degree** in violation of **Penal Law § 470.10(1)(b)(i)(A)**, in that on or about March 22, 2013, in the County of Kings and elsewhere within the State of New York, and in the States of Delaware and Maryland, knowing that the property, to wit, United States currency, involved in one or more financial transactions represented the proceeds of criminal conduct, the defendants conducted one or more such financial transactions which in fact involved the proceeds of specified criminal conduct, to wit, violation of N.Y. Tax L. §§ 481(2)(a) & 4, N.Y. Tax L. §§ 1814(a)(i) and (c)(2) and Enterprise Corruption, with intent to promote the carrying on of criminal conduct, and the total value involved in such financial transaction or transactions exceeded fifty thousand dollars.

PATTERN ACT #155

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu Saleem, each aiding the other and acting in concert, committed the crime of **Attempt to Evade or Defeat Cigarette and Tobacco Products Tax** in violation of **N.Y. Tax L. §§ 481(2)(a) 4 and N.Y. Tax L. § 1814(a)(i)**, in that on or about March 24, 2013, in the County of Kings and elsewhere within the State of New York, and in the States of Delaware and Maryland, did willfully attempt in any manner to evade or defeat the taxes imposed pursuant to New York State Tax Law or payment thereof on ten thousand or more cigarettes.

PATTERN ACT #156

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu Saleem, each aiding the other and acting in concert, committed the crime of **Possession or Transport for the Purpose of Sale, or Sale or Offering For Sale, of Thirty Thousand or More Cigarettes in Unstamped or Unlawfully Stamped Packages** in violation of **N.Y. Tax L. §§ 481(2)(a) & 4 and N.Y. Tax L. § 1814(c)(2)**, in that on or about March 24, 2013, in the County of Kings and elsewhere within the State of New York, and in the States of Delaware and Maryland, not being agents licensed by the Commissioner of the New York State Department of Taxation and Finance, did willfully possess or transport for the purpose of sale, thirty thousand or more cigarettes subject to the tax imposed pursuant to New York State Law in any unstamped or unlawfully

stamped packages, and/or willfully sold or offered for sale thirty thousand or more cigarettes in any unstamped or unlawfully stamped packages.

PATTERN ACT #157

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu Saleem, each aiding the other and acting in concert, committed the crime of **Money Laundering in the Third Degree** in violation of **Penal Law § 470.10(2)(b)(i)**, in that on or about March 24, 2013, in the County of Kings and elsewhere within the State of New York, and in the States of Delaware and Maryland, knowing that one or more monetary instruments, to wit, United States currency, represented the proceeds of criminal conduct, the defendants transported, transmitted, or transferred, or attempted to transport, transmit or transfer, on one or more occasions, monetary instruments which in fact represented the proceeds of specified criminal conduct, to wit, violation of N.Y. Tax L. §§ 481(2)(a) & 4, N.Y. Tax L. §§ 1814(a)(i) and (c)(2) and Enterprise Corruption, from a place in any county in this state to or through a place outside that county or to a place in any county in this state from or through a place outside that county, with intent to promote the carrying on of criminal conduct, and the total value of such monetary instrument or instruments exceeded fifty thousand dollars.

PATTERN ACT #158

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu Saleem, each aiding the other and acting in concert, committed the crime of **Money Laundering in the Third Degree** in violation of **Penal Law § 470.10(1)(b)(i)(A)**, in that

on or about March 24, 2013, in the County of Kings and elsewhere within the State of New York, and in the States of Delaware and Maryland, knowing that the property, to wit, United States currency, involved in one or more financial transactions represented the proceeds of criminal conduct, the defendants conducted one or more such financial transactions which in fact involved the proceeds of specified criminal conduct, to wit, violation of N.Y. Tax L. §§ 481(2)(a) & 4, N.Y. Tax L. §§ 1814(a)(i) and (c)(2) and Enterprise Corruption, with intent to promote the carrying on of criminal conduct, and the total value involved in such financial transaction or transactions exceeded fifty thousand dollars.

PATTERN ACT #159

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Ahmad Abdelaziz, a.k.a. Al Jaba'I, Ribhi Awawdeh and Mohamed Abed Alabed Awawdeh, a.k.a. Abu Samir, each aiding the other and acting in concert, committed the crime of **Attempt to Evade or Defeat Cigarette and Tobacco Products Tax** in violation of **N.Y. Tax L. §§ 481(2)(a) & 4 and N.Y. Tax L. § 1814(a)(i)**, in that on or about December 26, 2012, in the County of Kings, County of Bronx and elsewhere within the State of New York, and in the States of Delaware, Maryland and New Jersey, did willfully attempt in any manner to evade or defeat the taxes imposed pursuant to New York State Tax Law or payment thereof on ten thousand or more cigarettes.

PATTERN ACT #160

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Ahmad Abdelaziz, a.k.a. Al Jaba'I, Ribhi Awawdeh and Mohamed Abed Alabed Awawdeh, a.k.a. Abu Samir, each aiding the other and acting in concert, committed the crime of **Possession or Transport for the Purpose of Sale, or Sale or Offering For Sale, of Thirty Thousand or More Cigarettes in Unstamped or Unlawfully Stamped Packages** in violation of **N.Y. Tax L. §§ 481(2)(a) & 4 and N.Y. Tax L. § 1814(c)(2)**, in that on or about December 26, 2012, in the County of Kings, County of Bronx and elsewhere within the State of New York, and in the States of Delaware, Maryland and New Jersey, not being agents licensed by the Commissioner of the New York State Department of Taxation and Finance, did willfully possess or transport for the purpose of sale, thirty thousand or more cigarettes subject to the tax imposed pursuant to New York State Law in any unstamped or unlawfully stamped packages, and/or willfully sold or offered for sale thirty thousand or more cigarettes in any unstamped or unlawfully stamped packages.

PATTERN ACT #161

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Ahmad Abdelaziz, a.k.a. Al Jaba'I, Ribhi Awawdeh and Mohamed Abed Alabed Awawdeh, a.k.a. Abu Samir, each aiding the other and acting in concert, committed the crime of **Money Laundering in the Third Degree** in violation of **Penal Law § 470.10(2)(b)(i)**, in that on or about December 26, 2012, in the County of Kings, County of Bronx and elsewhere within the State of New York, and in the States of Delaware, Maryland and New Jersey, knowing

that one or more monetary instruments, to wit, United States currency, represented the proceeds of criminal conduct, the defendants transported, transmitted, or transferred, or attempted to transport, transmit or transfer, on one or more occasions, monetary instruments which in fact represented the proceeds of specified criminal conduct, to wit, violation of N.Y. Tax L. §§ 481(2)(a) & 4, N.Y. Tax L. §§ 1814(a)(i) and (c)(2) and Enterprise Corruption, from a place in any county in this state to or through a place outside that county or to a place in any county in this state from or through a place outside that county, with intent to promote the carrying on of criminal conduct, and the total value of such monetary instrument or instruments exceeded fifty thousand dollars.

PATTERN ACT #162

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Ahmad Abdelaziz, a.k.a. Al Jaba'I, Ribhi Awawdeh and Mohamed Abed Alabed Awawdeh, a.k.a. Abu Samir, each aiding the other and acting in concert, committed the crime of **Money Laundering in the Third Degree** in violation of **Penal Law § 470.10(1)(b)(i)(A)**, in that on or about December 26, 2012, in the County of Kings, County of Bronx and elsewhere within the State of New York, and in the States of Delaware, Maryland and New Jersey, knowing that the property, to wit, United States currency, involved in one or more financial transactions represented the proceeds of criminal conduct, the defendants conducted one or more such financial transactions which in fact involved the proceeds of specified criminal conduct, to wit, violation of N.Y. Tax L. §§ 481(2)(a) & 4, N.Y. Tax L. §§ 1814(a)(i) and (c)(2) and Enterprise Corruption, with intent to promote the carrying on of

criminal conduct, and the total value involved in such financial transaction or transactions exceeded fifty thousand dollars.

PATTERN ACT #163

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Issa Sulieman, Ribhi Awawdeh, Mohamed Abed Alabed Awawdeh, a.k.a. Abu Samir and Ahmad Abdelaziz, a.k.a. Al Jaba'I, each aiding the other and acting in concert, committed the crime of **Attempt to Evade or Defeat Cigarette and Tobacco Products Tax** in violation of **N.Y. Tax L. §§ 481(2)(a) & 4 and N.Y. Tax L. § 1814(a)(i)**, in that on or about January 7, 2013, in the County of Kings, County of Bronx and elsewhere within the State of New York, and in the States of Delaware, Maryland and New Jersey, did willfully attempt in any manner to evade or defeat the taxes imposed pursuant to New York State Tax Law or payment thereof on ten thousand or more cigarettes.

PATTERN ACT #164

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Issa Sulieman, Ribhi Awawdeh, Mohamed Abed Alabed Awawdeh, a.k.a. Abu Samir and Ahmad Abdelaziz, a.k.a. Al Jaba'I, each aiding the other and acting in concert, committed the crime of **Possession or Transport for the Purpose of Sale, or Sale or Offering For Sale, of Thirty Thousand or More Cigarettes in Unstamped or Unlawfully Stamped Packages** in violation of **N.Y. Tax L. §§ 481(2)(a) & 4 and N.Y. Tax L. § 1814(c)(2)**, in that on or about January 7, 2013, in the County of

Kings, County of Bronx and elsewhere within the State of New York, and in the States of Delaware, Maryland and New Jersey, not being agents licensed by the Commissioner of the New York State Department of Taxation and Finance, did willfully possess or transport for the purpose of sale, thirty thousand or more cigarettes subject to the tax imposed pursuant to New York State Law in any unstamped or unlawfully stamped packages, and/or willfully sold or offered for sale thirty thousand or more cigarettes in any unstamped or unlawfully stamped packages.

PATTERN ACT #165

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Issa Sulieman, Ribhi Awawdeh, Mohamed Abed Alabed Awawdeh, a.k.a. Abu Samir and Ahmad Abdelaziz, a.k.a. Al Jaba'I, each aiding the other and acting in concert, committed the crime of **Money Laundering in the Third Degree** in violation of **Penal Law § 470.10(2)(b)(i)**, in that on or about January 7, 2013, in the County of Kings, County of Bronx and elsewhere within the State of New York, and in the States of Delaware, Maryland and New Jersey, knowing that one or more monetary instruments, to wit, United States currency, represented the proceeds of criminal conduct, the defendants transported, transmitted, or transferred, or attempted to transport, transmit or transfer, on one or more occasions, monetary instruments which in fact represented the proceeds of specified criminal conduct, to wit, violation of N.Y. Tax L. §§ 481(2)(a) & 4, N.Y. Tax L. §§ 1814(a)(i) and (c)(2) and Enterprise Corruption, from a place in any county in this state to or through a place outside that county or to a place in any county in this state from or through a place outside that county, with intent to promote the carrying

on of criminal conduct, and the total value of such monetary instrument or instruments exceeded fifty thousand dollars.

PATTERN ACT #166

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Issa Sulieman, Ribhi Awawdeh, Mohamed Abed Alabed Awawdeh, a.k.a. Abu Samir and Ahmad Abdelaziz, a.k.a. Al Jaba'I, each aiding the other and acting in concert, committed the crime of **Money Laundering in the Third Degree** in violation of **Penal Law § 470.10(1)(b)(i)(A)**, in that on or about January 7, 2013, in the County of Kings, County of Bronx and elsewhere within the State of New York, and in the States of Delaware, Maryland and New Jersey, knowing that the property, to wit, United States currency, involved in one or more financial transactions represented the proceeds of criminal conduct, the defendants conducted one or more such financial transactions which in fact involved the proceeds of specified criminal conduct, to wit, violation of N.Y. Tax L. §§ 481(2)(a) & 4, N.Y. Tax L. §§ 1814(a)(i) and (c)(2) and Enterprise Corruption, with intent to promote the carrying on of criminal conduct, and the total value involved in such financial transaction or transactions exceeded fifty thousand dollars.

PATTERN ACT #167

Defendants Basel Ramadan, a.k.a. Abu Salah, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Ribhi Awawdeh, Mohamed Abed Alabed Awawdeh, a.k.a. Abu Samir and Ahmad Abdelaziz, a.k.a. Al Jaba'I, each aiding the other and acting in concert, committed the crime of **Attempt to Evade or Defeat Cigarette and Tobacco Products**

Tax in violation of **N.Y. Tax L. §§ 481(2)(a) & 4** and **N.Y. Tax L. § 1814(a)(i)**, in that on or about January 9, 2013, in the County of Kings, County of Bronx and elsewhere within the State of New York, and in the States of Delaware, Maryland and New Jersey, did willfully attempt in any manner to evade or defeat the taxes imposed pursuant to New York State Tax Law or payment thereof on ten thousand or more cigarettes.

PATTERN ACT #168

Defendants Basel Ramadan, a.k.a. Abu Salah, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Ribhi Awawdeh, Mohamed Abed Alabed Awawdeh, a.k.a. Abu Samir and Ahmad Abdelaziz, a.k.a. Al Jaba'I, each aiding the other and acting in concert, committed the crime of **Possession or Transport for the Purpose of Sale, or Sale or Offering For Sale, of Thirty Thousand or More Cigarettes in Unstamped or Unlawfully Stamped Packages** in violation of **N.Y. Tax L. §§ 481(2)(a) & 4** and **N.Y. Tax L. § 1814(c)(2)**, in that on or about January 9, 2013, in the County of Kings, County of Bronx and elsewhere within the State of New York, and in the States of Delaware, Maryland and New Jersey, not being agents licensed by the Commissioner of the New York State Department of Taxation and Finance, did willfully possess or transport for the purpose of sale, thirty thousand or more cigarettes subject to the tax imposed pursuant to New York State Law in any unstamped or unlawfully stamped packages, and/or willfully sold or offered for sale thirty thousand or more cigarettes in any unstamped or unlawfully stamped packages.

PATTERN ACT #169

Defendants Basel Ramadan, a.k.a. Abu Salah, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Ribhi Awawdeh, Mohamed Abed Alabed Awawdeh, a.k.a. Abu Samir

and Ahmad Abdelaziz, a.k.a. Al Jaba'I, each aiding the other and acting in concert, committed the crime of **Money Laundering in the Third Degree** in violation of **Penal Law § 470.10(2)(b)(i)**, in that on or about January 9, 2013, in the County of Kings, County of Bronx and elsewhere within the State of New York, and in the States of Delaware, Maryland and New Jersey, knowing that one or more monetary instruments, to wit, United States currency, represented the proceeds of criminal conduct, the defendants transported, transmitted, or transferred, or attempted to transport, transmit or transfer, on one or more occasions, monetary instruments which in fact represented the proceeds of specified criminal conduct, to wit, violation of N.Y. Tax L. §§ 481(2)(a) & 4, N.Y. Tax L. §§ 1814(a)(i) and (c)(2) and Enterprise Corruption, from a place in any county in this state to or through a place outside that county or to a place in any county in this state from or through a place outside that county, with intent to promote the carrying on of criminal conduct, and the total value of such monetary instrument or instruments exceeded fifty thousand dollars.

PATTERN ACT #170

Defendants Basel Ramadan, a.k.a. Abu Salah, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Ribhi Awawdeh, Mohamed Abed Alabed Awawdeh, a.k.a. Abu Samir and Ahmad Abdelaziz, a.k.a. Al Jaba'I, each aiding the other and acting in concert, committed the crime of **Money Laundering in the Third Degree** in violation of **Penal Law § 470.10(1)(b)(i)(A)**, in that on or about January 9, 2013, in the County of Kings, County of Bronx and elsewhere within the State of New York, and in the States of Delaware, Maryland and New Jersey, knowing that the property, to wit, United States currency, involved in one or more financial transactions represented the proceeds of

criminal conduct, the defendants conducted one or more such financial transactions which in fact involved the proceeds of specified criminal conduct, to wit, violation of N.Y. Tax L. §§ 481(2)(a) & 4, N.Y. Tax L. §§ 1814(a)(i) and (c)(2) and Enterprise Corruption, with intent to promote the carrying on of criminal conduct, and the total value involved in such financial transaction or transactions exceeded fifty thousand dollars.

PATTERN ACT #171

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Ribhi Awawdeh, Mohamed Abed Alabed Awawdeh, a.k.a. Abu Samir and Ahmad Abdelaziz, a.k.a. Al Jaba'I, each aiding the other and acting in concert, committed the crime of **Attempt to Evade or Defeat Cigarette and Tobacco Products Tax** in violation of **N.Y. Tax L. §§ 481(2)(a) & 4 and N.Y. Tax L. § 1814(a)(i)**, in that on or about January 27, 2013, in the County of Kings, County of Bronx and elsewhere within the State of New York, and in the States of Delaware, Maryland and New Jersey, did willfully attempt in any manner to evade or defeat the taxes imposed pursuant to New York State Tax Law or payment thereof on ten thousand or more cigarettes.

PATTERN ACT #172

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Ribhi Awawdeh, Mohamed Abed Alabed Awawdeh, a.k.a. Abu Samir and Ahmad Abdelaziz, a.k.a. Al Jaba'I, each aiding the other and acting in concert, committed the crime of **Possession or Transport for the Purpose of Sale, or Sale or Offering For Sale, of Thirty Thousand**

or More Cigarettes in Unstamped or Unlawfully Stamped Packages in violation of **N.Y. Tax L. §§ 481(2)(a) & 4 and N.Y. Tax L. § 1814(c)(2)**, in that on or about January 27, 2013, in the County of Kings, County of Bronx and elsewhere within the State of New York, and in the States of Delaware, Maryland and New Jersey, not being agents licensed by the Commissioner of the New York State Department of Taxation and Finance, did willfully possess or transport for the purpose of sale, thirty thousand or more cigarettes subject to the tax imposed pursuant to New York State Law in any unstamped or unlawfully stamped packages, and/or willfully sold or offered for sale thirty thousand or more cigarettes in any unstamped or unlawfully stamped packages.

PATTERN ACT #173

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Ribhi Awawdeh, Mohamed Abed Alabed Awawdeh, a.k.a. Abu Samir and Ahmad Abdelaziz, a.k.a. Al Jaba'I, each aiding the other and acting in concert, committed the crime of **Money Laundering in the Third Degree** in violation of **Penal Law § 470.10(2)(b)(i)** in that on or about January 27, 2013, in the County of Kings, County of Bronx and elsewhere within the State of New York, and in the States of Delaware, Maryland and New Jersey, knowing that one or more monetary instruments, to wit, United States currency, represented the proceeds of criminal conduct, the defendants transported, transmitted, or transferred, or attempted to transport, transmit or transfer, on one or more occasions, monetary instruments which in fact represented the proceeds of specified criminal conduct, to wit, violation of N.Y. Tax L. §§ 481(2)(a) & 4, N.Y. Tax L. §§ 1814(a)(i) and (c)(2) and

Enterprise Corruption, from a place in any county in this state to or through a place outside that county or to a place in any county in this state from or through a place outside that county, with intent to promote the carrying on of criminal conduct, and the total value of such monetary instrument or instruments exceeded fifty thousand dollars.

PATTERN ACT #174

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Ribhi Awawdeh, Mohamed Abed Alabed Awawdeh, a.k.a. Abu Samir and Ahmad Abdelaziz, a.k.a. Al Jaba'I, each aiding the other and acting in concert, committed the crime of **Money Laundering in the Third Degree** in violation of **Penal Law § 470.10(1)(b)(i)(A)**, in that on or about January 27, 2013, in the County of Kings, County of Bronx and elsewhere within the State of New York, and in the States of Delaware, Maryland and New Jersey, knowing that the property, to wit, United States currency, involved in one or more financial transactions represented the proceeds of criminal conduct, the defendants conducted one or more such financial transactions which in fact involved the proceeds of specified criminal conduct, to wit, violation of N.Y. Tax L. §§ 481(2)(a) & 4, N.Y. Tax L. §§ 1814(a)(i) and (c)(2) and Enterprise Corruption, with intent to promote the carrying on of criminal conduct, and the total value involved in such financial transaction or transactions exceeded fifty thousand dollars.

PATTERN ACT #175

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu

Mahmoud, Issa Sulieman, Ahmad Abdelaziz, a.k.a. Al Jaba'I, Ribhi Awawdeh and Mohamed Abed Alabed Awawdeh, a.k.a. Abu Samir, each aiding the other and acting in concert, committed the crime of **Attempt to Evade or Defeat Cigarette and Tobacco Products Tax** in violation of **N.Y. Tax L. §§ 481(2)(a) & 4 and N.Y. Tax L. § 1814(a)(i)**, in that on or about February 11, 2013, in the County of Kings, County of Bronx and elsewhere within the State of New York, and in the States of Delaware, Maryland and New Jersey, did willfully attempt in any manner to evade or defeat the taxes imposed pursuant to New York State Tax Law or payment thereof on ten thousand or more cigarettes.

PATTERN ACT #176

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Issa Sulieman, Ahmad Abdelaziz, a.k.a. Al Jaba'I, Ribhi Awawdeh and Mohamed Abed Alabed Awawdeh, a.k.a. Abu Samir, each aiding the other and acting in concert, committed the crime of **Possession or Transport for the Purpose of Sale, or Sale or Offering For Sale, of Thirty Thousand or More Cigarettes in Unstamped or Unlawfully Stamped Packages** in violation of **N.Y. Tax L. §§ 481(2)(a) & 4 and N.Y. Tax L. § 1814(c)(2)**, in that on or about February 11, 2013, in the County of Kings, County of Bronx and elsewhere within the State of New York, and in the States of Delaware, Maryland and New Jersey, not being agents licensed by the Commissioner of the New York State Department of Taxation and Finance, did willfully possess or transport for the purpose of sale, thirty thousand or more cigarettes subject to the tax imposed pursuant to New York State Law in any unstamped or unlawfully stamped

packages, and/or willfully sold or offered for sale thirty thousand or more cigarettes in any unstamped or unlawfully stamped packages.

PATTERN ACT #177

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Issa Sulieman, Ahmad Abdelaziz, a.k.a. Al Jaba'I, Ribhi Awawdeh and Mohamed Abed Alabed Awawdeh, a.k.a. Abu Samir, each aiding the other and acting in concert, committed the crime of **Money Laundering in the Second Degree** in violation of **Penal Law § 470.15(2)(b)(i)**, in that on or about February 11, 2013, in the County of Kings, County of Bronx and elsewhere within the State of New York, and in the States of Delaware, Maryland and New Jersey, knowing that one or more monetary instruments, to wit, United States currency, represented the proceeds of specified criminal conduct, the defendants transported, transmitted, or transferred, or attempted to transport, transmit or transfer, on one or more occasions, monetary instruments which in fact represented the proceeds of specified criminal conduct, to wit, violation of N.Y. Tax L. §§ 481(2)(a) & 4, N.Y. Tax L. §§ 1814(a)(i) and (c)(2) and Enterprise Corruption, from a place in any county in this state to or through a place outside that county or to a place in any county in this state from or through a place outside that county, with intent to promote the carrying on of specified criminal conduct, and the total value of such monetary instrument or instruments exceeded one hundred thousand dollars.

PATTERN ACT #178

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu

Mahmoud, Issa Sulieman, Ahmad Abdelaziz, a.k.a. Al Jaba'I, Ribhi Awawdeh and Mohamed Abed Alabed Awawdeh, a.k.a. Abu Samir, each aiding the other and acting in concert, committed the crime of **Money Laundering in the Second Degree** in violation of **Penal Law § 470.15(1)(b)(i)(A)**, in that on or about February 11, 2013, in the County of Kings, County of Bronx and elsewhere within the State of New York, and in the States of Delaware, Maryland and New Jersey, knowing that the property, to wit, United States currency, involved in one or more financial transactions represented the proceeds of specified criminal conduct, the defendants conducted one or more such financial transactions which in fact involved the proceeds of specified criminal conduct, to wit, violation of N.Y. Tax L. §§ 481(2)(a) & 4, N.Y. Tax L. §§ 1814(a)(i) and (c)(2) and Enterprise Corruption, with intent to promote the carrying on of specified criminal conduct, and the total value involved in such financial transaction or transactions exceeded one hundred thousand dollars.

PATTERN ACT #179

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Issa Sulieman, Ahmad Abdelaziz, a.k.a. Al Jaba'I, Ribhi Awawdeh and Mohamed Abed Alabed Awawdeh, a.k.a. Abu Samir, each aiding the other and acting in concert, committed the crime of **Attempt to Evade or Defeat Cigarette and Tobacco Products Tax** in violation of **N.Y. Tax L. §§ 481(2)(a) & 4 and N.Y. Tax L. § 1814(a)(i)**, in that on or about February 27, 2013, in the County of Kings, County of Bronx and elsewhere within the State of New York, and in the States of Delaware, Maryland and New Jersey, did willfully attempt in any manner to evade or defeat the

taxes imposed pursuant to New York State Tax Law or payment thereof on ten thousand or more cigarettes.

PATTERN ACT #180

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Issa Sulieman, Ahmad Abdelaziz, a.k.a. Al Jaba'I, Ribhi Awawdeh and Mohamed Abed Alabed Awawdeh, a.k.a. Abu Samir, each aiding the other and acting in concert, committed the crime of **Possession or Transport for the Purpose of Sale, or Sale or Offering For Sale, of Thirty Thousand or More Cigarettes in Unstamped or Unlawfully Stamped Packages** in violation of N.Y. Tax L. §§ 481(2)(a) & 4 and N.Y. Tax L. § 1814(c)(2), in that on or about February 27, 2013, in the County of Kings, County of Bronx and elsewhere within the State of New York, and in the States of Delaware, Maryland and New Jersey, not being agents licensed by the Commissioner of the New York State Department of Taxation and Finance, did willfully possess or transport for the purpose of sale, thirty thousand or more cigarettes subject to the tax imposed pursuant to New York State Law in any unstamped or unlawfully stamped packages, and/or willfully sold or offered for sale thirty thousand or more cigarettes in any unstamped or unlawfully stamped packages.

PATTERN ACT #181

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Issa Sulieman, Ahmad Abdelaziz, a.k.a. Al Jaba'I, Ribhi Awawdeh and Mohamed Abed Alabed Awawdeh, a.k.a. Abu Samir, each aiding the other and acting

in concert, committed the crime of **Money Laundering in the Second Degree** in violation of **Penal Law § 470.15(2)(b)(i)**, in that on or about February 27, 2013, in the County of Kings, County of Bronx and elsewhere within the State of New York, and in the States of Delaware, Maryland and New Jersey, knowing that one or more monetary instruments, to wit, United States currency, represented the proceeds of specified criminal conduct, the defendants transported, transmitted, or transferred, or attempted to transport, transmit or transfer, on one or more occasions, monetary instruments which in fact represented the proceeds of specified criminal conduct, to wit, violation of N.Y. Tax L. §§ 481(2)(a) & 4, N.Y. Tax L. §§ 1814(a)(i) and (c)(2) and Enterprise Corruption, from a place in any county in this state to or through a place outside that county or to a place in any county in this state from or through a place outside that county, with intent to promote the carrying on of specified criminal conduct, and the total value of such monetary instrument or instruments exceeded one hundred thousand dollars.

PATTERN ACT #182

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Issa Sulieman, Ahmad Abdelaziz, a.k.a. Al Jaba'I, Ribhi Awawdeh and Mohamed Abed Alabed Awawdeh, a.k.a. Abu Samir, each aiding the other and acting in concert, committed the crime of **Money Laundering in the Second Degree** in violation of **Penal Law § 470.15(1)(b)(i)(A)**, in that on or about February 27, 2013, in the County of Kings, County of Bronx and elsewhere within the State of New York, and in the States of Delaware, Maryland and New Jersey, knowing that the property, to wit, United States currency, involved in one or more financial transactions represented the

proceeds of specified criminal conduct, the defendants conducted one or more such financial transactions which in fact involved the proceeds of specified criminal conduct, to wit, violation of N.Y. Tax L. §§ 481(2)(a) & 4, N.Y. Tax L. §§ 1814(a)(i) and (c)(2) and Enterprise Corruption, with intent to promote the carrying on of specified criminal conduct, and the total value involved in such financial transaction or transactions exceeded one hundred thousand dollars.

PATTERN ACT #183

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Issa Sulieman, Bassam Twam and Muaffaq Askar, each aiding the other and acting in concert, committed the crime of **Attempt to Evade or Defeat Cigarette and Tobacco Products Tax** in violation of **N.Y. Tax L. §481(2)(a) & 4** and **N.Y. Tax L. § 1814(a)(i)**, in that on or about March 16, 2013, in the County of Kings and elsewhere within the State of New York, and in the States of Delaware and Maryland, did willfully attempt in any manner to evade or defeat the taxes imposed pursuant to New York State Tax Law or payment thereof on ten thousand or more cigarettes.

PATTERN ACT #184

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Issa Sulieman, Bassam Twam and Muaffaq Askar, each aiding the other and acting in concert, committed the crime of **Possession or Transport for the Purpose of Sale, or Sale or Offering For Sale, of Thirty Thousand or More Cigarettes in Unstamped or Unlawfully Stamped Packages** in violation of **N.Y. Tax L. §§ 481(2)(a)**

& 4 and N.Y. Tax L. § 1814(c)(2), in that on or about March 16, 2013, in the County of Kings and elsewhere within the State of New York, and in the States of Delaware and Maryland, not being agents licensed by the Commissioner of the New York State Department of Taxation and Finance, did willfully possess or transport for the purpose of sale, thirty thousand or more cigarettes subject to the tax imposed pursuant to New York State Law in any unstamped or unlawfully stamped packages, and/or willfully sold or offered for sale thirty thousand or more cigarettes in any unstamped or unlawfully stamped packages.

PATTERN ACT #185

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Issa Sulieman, Bassam Twam and Muaffaq Askar, each aiding the other and acting in concert, committed the crime of **Money Laundering in the Third Degree** in violation of **Penal Law § 470.10(2)(b)(i)**, in that on or about March 16, 2013, in the County of Kings and elsewhere within the State of New York, and in the States of Delaware and Maryland, knowing that one or more monetary instruments, to wit, United States currency, represented the proceeds of criminal conduct, the defendants transported, transmitted, or transferred, or attempted to transport, transmit or transfer, on one or more occasions, monetary instruments which in fact represented the proceeds of specified criminal conduct, to wit, violation of N.Y. Tax L. §§ 481(2)(a) & 4, N.Y. Tax L. §§ 1814(a)(i) and (c)(2) and Enterprise Corruption, from a place in any county in this state to or through a place outside that county or to a place in any county in this state from or through a place outside that county, with intent to promote the carrying on of criminal

conduct, and the total value of such monetary instrument or instruments exceeded fifty thousand dollars.

PATTERN ACT #186

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Issa Sulieman, Bassam Twam and Muaffaq Askar, each aiding the other and acting in concert, committed the crime of **Money Laundering in the Third Degree** in violation of **Penal Law § 470.10(1)(b)(i)(A)**, in that on or about March 16, 2013, in the County of Kings and elsewhere within the State of New York, and in the States of Delaware and Maryland, knowing that the property, to wit, United States currency, involved in one or more financial transactions represented the proceeds of criminal conduct, the defendants conducted one or more such financial transactions which in fact involved the proceeds of specified criminal conduct, to wit, violation of N.Y. Tax L. §§ 481(2)(a) & 4, N.Y. Tax L. §§ 1814(a)(i) and (c)(2) and Enterprise Corruption, with intent to promote the carrying on of criminal conduct, and the total value involved in such financial transaction or transactions exceeded fifty thousand dollars.

PATTERN ACT #187

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Issa Sulieman, Bassam Twam, Muaffaq Askar and Ahmad Abdelaziz, a.k.a. Al Jaba'I, each aiding the other and acting in concert, committed the crime of **Attempt to Evade or Defeat Cigarette and Tobacco Products Tax** in violation of N.Y. Tax L. §§ 481(2)(a) & 4 and N.Y. Tax L. § 1814(a)(i), in that on or about March 20,

2013, in the County of Kings and elsewhere within the State of New York, and in the States of Delaware and Maryland, did willfully attempt in any manner to evade or defeat the taxes imposed pursuant to New York State Tax Law or payment thereof on ten thousand or more cigarettes.

PATTERN ACT #188

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Issa Sulieman, Bassam Twam, Muaffaq Askar and Ahmad Abdelaziz, a.k.a. Al Jaba'I, each aiding the other and acting in concert, committed the crime of **Possession or Transport for the Purpose of Sale, or Sale or Offering For Sale, of Thirty Thousand or More Cigarettes in Unstamped or Unlawfully Stamped Packages** in violation of N.Y. Tax L. §§ 481(2)(a) & 4 and N.Y. Tax L. § 1814(c)(2), in that on or about March 20, 2013, in the County of Kings and elsewhere within the State of New York, and in the States of Delaware and Maryland, not being agents licensed by the Commissioner of the New York State Department of Taxation and Finance, did willfully possess or transport for the purpose of sale, thirty thousand or more cigarettes subject to the tax imposed pursuant to New York State Law in any unstamped or unlawfully stamped packages, and/or willfully sold or offered for sale thirty thousand or more cigarettes in any unstamped or unlawfully stamped packages.

PATTERN ACT #189

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Issa Sulieman, Bassam Twam, Muaffaq Askar and Ahmad Abdelaziz,

a.k.a. Al Jaba'I, each aiding the other and acting in concert, committed the crime of **Money Laundering in the Second Degree** in violation of **Penal Law § 470.15(2)(b)(i)**, in that on or about March 20, 2013, in the County of Kings and elsewhere within the State of New York, and in the States of Delaware and Maryland, knowing that one or more monetary instruments, to wit, United States currency, represented the proceeds of specified criminal conduct, the defendants transported, transmitted, or transferred, or attempted to transport, transmit or transfer, on one or more occasions, monetary instruments which in fact represented the proceeds of specified criminal conduct, to wit, violation of N.Y. Tax L. §§ 481(2)(a) & 4, N.Y. Tax L. §§ 1814(a)(i) and (c)(2) and Enterprise Corruption, from a place in any county in this state to or through a place outside that county or to a place in any county in this state from or through a place outside that county, with intent to promote the carrying on of specified criminal conduct, and the total value of such monetary instrument or instruments exceeded one hundred thousand dollars.

PATTERN ACT #190

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Issa Sulieman, Bassam Twam, Muaffaq Askar and Ahmad Abdelaziz, a.k.a. Al Jaba'I, each aiding the other and acting in concert, committed the crime of **Money Laundering in the Second Degree** in violation of **Penal Law § 470.15(1)(b)(i)(A)**, in that on or about March 20, 2013, in the County of Kings and elsewhere within the State of New York, and in the States of Delaware and Maryland, knowing that the property, to wit, United States currency, involved in one or more

financial transactions represented the proceeds of specified criminal conduct, the defendants conducted one or more such financial transactions which in fact involved the proceeds of specified criminal conduct, to wit, violation of N.Y. Tax L. §§ 481(2)(a) & 4, N.Y. Tax L. §§ 1814(a)(i) and (c)(2) and Enterprise Corruption, with intent to promote the carrying on of specified criminal conduct, and the total value involved in such financial transaction or transactions exceeded one hundred thousand dollars.

PATTERN ACT #191

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Issa Sulieman and Muaffaq Askar, each aiding the other and acting in concert, committed the crime of **Attempt to Evade or Defeat Cigarette and Tobacco Products Tax** in violation of **N.Y. Tax L. §§ 481(2)(a) & 4 and N.Y. Tax L. § 1814(a)(i)**, in that on or about February 13, 2013, in the County of Kings and elsewhere within the State of New York, and in the States of Delaware and Maryland, did willfully attempt in any manner to evade or defeat the taxes imposed pursuant to New York State Tax Law or payment thereof on ten thousand or more cigarettes.

PATTERN ACT #192

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Issa Sulieman and Muaffaq Askar, each aiding the other and acting in concert, committed the crime of **Possession or Transport for the Purpose of Sale, or Sale or Offering For Sale, of Thirty Thousand or More Cigarettes in Unstamped or Unlawfully Stamped Packages** in violation of **N.Y. Tax L. §§ 481(2)(a) & 4 and N.Y.**

Tax L. § 1814(c)(2), in that on or about February 13, 2013, in the County of Kings and elsewhere within the State of New York, and in the States of Delaware and Maryland not being agents licensed by the Commissioner of the New York State Department of Taxation and Finance, did willfully possess or transport for the purpose of sale, thirty thousand or more cigarettes subject to the tax imposed pursuant to New York State Law in any unstamped or unlawfully stamped packages, and/or willfully sold or offered for sale thirty thousand or more cigarettes in any unstamped or unlawfully stamped packages.

PATTERN ACT #193

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Issa Sulieman and Muaffaq Askar, committed the crime of **Money Laundering in the Fourth Degree** in violation of **Penal Law § 470.05(2)(a)(i)**, in that on or about February 13, 2013, in the County of Kings and elsewhere within the State of New York, and in the States of Delaware and Maryland, knowing that one or more monetary instruments, to wit, United States currency, represented the proceeds of criminal conduct, the defendants transported, transmitted, or transferred, or attempted to transport, transmit or transfer, on one or more occasions, monetary instruments which in fact represented the proceeds of specified criminal conduct, to wit, violation of N.Y. Tax L. §§ 481(2)(a) & 4, N.Y. Tax L. §§ 1814(a)(i) and (c)(2) and Enterprise Corruption, with intent to promote the carrying on of criminal conduct, and the total value of such monetary instrument or instruments exceeded ten thousand dollars.

PATTERN ACT #194

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Issa Sulieman and Muaffaq Askar, committed the crime of **Money Laundering in the Fourth Degree** in violation of **Penal Law § 470.05(1)(a)(i)(A)**, in that on or about February 13, 2013, in the County of Kings and elsewhere within the State of New York, and in the States of Delaware and Maryland, knowing that the property, to wit, United States currency, involved in one or more financial transactions represented the proceeds of criminal conduct, the defendants conducted one or more such financial transactions which in fact involved the proceeds of specified criminal conduct, to wit, violation of N.Y. Tax L. §§ 481(2)(a) & 4, N.Y. Tax L. §§ 1814(a)(i) and (c)(2) and Enterprise Corruption, with intent to promote the carrying on of criminal conduct, and the total value involved in such financial transaction or transactions exceeded five thousand dollars.

PATTERN ACT #195

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Issa Sulieman and Muaffaq Askar, each aiding the other and acting in concert, committed the crime of **Attempt to Evade or Defeat Cigarette and Tobacco Products Tax** in violation of **N.Y. Tax L. §§ 481(2)(a) & 4 and N.Y. Tax L. § 1814(a)(i)**, in that on or about February 21, 2013, in the County of Kings and elsewhere within the State of New York, and in the States of Delaware and Maryland, did willfully

attempt in any manner to evade or defeat the taxes imposed pursuant to New York State Tax Law or payment thereof on ten thousand or more cigarettes.

PATTERN ACT #196

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Issa Sulieman and Muaffaq Askar, each aiding the other and acting in concert, committed the crime of **Possession or Transport for the Purpose of Sale, or Sale or Offering For Sale, of Thirty Thousand or More Cigarettes in Unstamped or Unlawfully Stamped Packages** in violation of **N.Y. Tax L. §§ 481(2)(a) & 4 and N.Y. Tax L. § 1814(c)(2)**, in that on or about February 21, 2013, in the County of Kings and elsewhere within the State of New York, and in the States of Delaware and Maryland, not being agents licensed by the Commissioner of the New York State Department of Taxation and Finance, did willfully possess or transport for the purpose of sale, thirty thousand or more cigarettes subject to the tax imposed pursuant to New York State Law in any unstamped or unlawfully stamped packages, and/or willfully sold or offered for sale thirty thousand or more cigarettes in any unstamped or unlawfully stamped packages.

PATTERN ACT #197

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Issa Sulieman and Muaffaq Askar, committed the crime of **Money Laundering in the Fourth Degree** in violation of **Penal Law § 470.05(2)(a)(i)**, in that on or about February 21, 2013, in the County of Kings and elsewhere within the State of

New York, and in the States of Delaware and Maryland, knowing that one or more monetary instruments, to wit, United States currency, represented the proceeds of criminal conduct, the defendants transported, transmitted, or transferred, or attempted to transport, transmit or transfer, on one or more occasions, monetary instruments which in fact represented the proceeds of specified criminal conduct, to wit, violation of N.Y. Tax L. §§ 481(2)(a) & 4, N.Y. Tax L. §§ 1814(a)(i) and (c)(2) and Enterprise Corruption, with intent to promote the carrying on of criminal conduct, and the total value of such monetary instrument or instruments exceeded ten thousand dollars.

PATTERN ACT #198

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Issa Sulieman and Muaffaq Askar, committed the crime of **Money Laundering in the Fourth Degree** in violation of **Penal Law § 470.05(1)(a)(i)(A)**, in that on or about February 21, 2013, in the County of Kings and elsewhere within the State of New York, and in the States of Delaware and Maryland, knowing that the property, to wit, United States currency, involved in one or more financial transactions represented the proceeds of criminal conduct, the defendants conducted one or more such financial transactions which in fact involved the proceeds of specified criminal conduct, to wit, violation of N.Y. Tax L. §§ 481(2)(a) & 4, N.Y. Tax L. §§ 1814(a)(i) and (c)(2) and Enterprise Corruption, with intent to promote the carrying on of criminal conduct, and the total value involved in such financial transaction or transactions exceeded five thousand dollars.

PATTERN ACT #199

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Issa Sulieman, Ahmad Abdelaziz, a.k.a. Al Jaba'I, Ribhi Awawdeh, Mohamed Abed Alabed Awawdeh, a.k.a. Abu Samir, Muaffaq Askar and Mohannad Seif, each aiding the other and acting in concert, committed the crime of **Attempt to Evade or Defeat Cigarette and Tobacco Products Tax** in violation of N.Y. Tax L. §§ 481(2)(a) & 4 and N.Y. Tax L. § 1814(a)(i), in that on or about March 6, 2013, in the County of Kings, County of Bronx and elsewhere within the State of New York, and in the States of Delaware, Maryland and New Jersey, did willfully attempt in any manner to evade or defeat the taxes imposed pursuant to New York State Tax Law or payment thereof on ten thousand or more cigarettes.

PATTERN ACT #200

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Issa Sulieman, Ahmad Abdelaziz, a.k.a. Al Jaba'I, Ribhi Awawdeh, Mohamed Abed Alabed Awawdeh, a.k.a. Abu Samir, Muaffaq Askar and Mohannad Seif, each aiding the other and acting in concert, committed the crime of **Possession or Transport for the Purpose of Sale, or Sale or Offering For Sale, of Thirty Thousand or More Cigarettes in Unstamped or Unlawfully Stamped Packages** in violation of N.Y. Tax L. §§ 481(2)(a) & 4 and N.Y. Tax L. § 1814(c)(2), in that on or about March 6, 2013, in the County of Kings, County of Bronx and elsewhere

within the State of New York, and in the States of Delaware, Maryland and New Jersey, not being agents licensed by the Commissioner of the New York State Department of Taxation and Finance, did willfully possess or transport for the purpose of sale, thirty thousand or more cigarettes subject to the tax imposed pursuant to New York State Law in any unstamped or unlawfully stamped packages, and/or willfully sold or offered for sale thirty thousand or more cigarettes in any unstamped or unlawfully stamped packages.

PATTERN ACT #201

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Issa Sulieman, Ahmad Abdelaziz, a.k.a. Al Jaba'I, Ribhi Awawdeh, Mohamed Abed Alabed Awawdeh, a.k.a. Abu Samir, Muaffaq Askar and Mohannad Seif, each aiding the other and acting in concert, committed the crime of **Money Laundering in the Third Degree** in violation of **Penal Law § 470.10(2)(b)(i)**, in that on or about March 6, 2013, in the County of Kings, County of Bronx and elsewhere within the State of New York, and in the States of Delaware, Maryland and New Jersey, knowing that one or more monetary instruments, to wit, United States currency, represented the proceeds of criminal conduct, the defendants transported, transmitted, or transferred, or attempted to transport, transmit or transfer, on one or more occasions, monetary instruments which in fact represented the proceeds of specified criminal conduct, to wit, violation of N.Y. Tax L. §§ 481(2)(a) & 4, N.Y. Tax L. §§ 1814(a)(i) and (c)(2) and Enterprise Corruption, from a place in any county in this state to or through a place outside that county or to a place in any county in this state from or

through a place outside that county, with intent to promote the carrying on of criminal conduct, and the total value of such monetary instrument or instruments exceeded fifty thousand dollars.

PATTERN ACT #202

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Issa Sulieman, Ahmad Abdelaziz, a.k.a. Al Jaba'I, Ribhi Awawdeh, Mohamed Abed Alabed Awawdeh, a.k.a. Abu Samir, Muaffaq Askar and Mohannad Seif, each aiding the other and acting in concert, committed the crime of **Money Laundering in the Third Degree** in violation of **Penal Law § 470.10(1)(b)(i)(A)**, in that on or about March 6, 2013, in the County of Kings, County of Bronx and elsewhere within the State of New York, and in the States of Delaware, Maryland and New Jersey, knowing that the property, to wit, United States currency, involved in one or more financial transactions represented the proceeds of criminal conduct, the defendants conducted one or more such financial transactions which in fact involved the proceeds of specified criminal conduct, to wit, violation of N.Y. Tax L. §§ 481(2)(a) & 4, N.Y. Tax L. §§ 1814(a)(i) and (c)(2) and Enterprise Corruption, with intent to promote the carrying on of criminal conduct, and the total value involved in such financial transaction or transactions exceeded fifty thousand dollars.

PATTERN ACT #203

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Bassam Twam, Murad Bishrat and Mohannad Seif, each aiding the other

and acting in concert, committed the crime of **Attempt to Evade or Defeat Cigarette and Tobacco Products Tax** in violation of **N.Y. Tax L. §§ 481(2)(a) & 4** and **N.Y. Tax L. § 1814(a)(i)**, in that on or about September 22, 2012, in the County of Kings and elsewhere within the State of New York, and in the States of Delaware and Maryland, did willfully attempt in any manner to evade or defeat the taxes imposed pursuant to New York State Tax Law or payment thereof on ten thousand or more cigarettes.

PATTERN ACT #204

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Bassam Twam, Murad Bishrat and Mohannad Seif, each aiding the other and acting in concert, committed the crime of **Possession or Transport for the Purpose of Sale, or Sale or Offering For Sale, of Thirty Thousand or More Cigarettes in Unstamped or Unlawfully Stamped Packages** in violation of **N.Y. Tax L. §§ 481(2)(a) & 4** and **N.Y. Tax L. § 1814(c)(2)**, in that on or about September 22, 2012, in the County of Kings and elsewhere within the State of New York, and in the States of Delaware and Maryland, not being agents licensed by the Commissioner of the New York State Department of Taxation and Finance, did willfully possess or transport for the purpose of sale, thirty thousand or more cigarettes subject to the tax imposed pursuant to New York State Law in any unstamped or unlawfully stamped packages, and/or willfully sold or offered for sale thirty thousand or more cigarettes in any unstamped or unlawfully stamped packages.

PATTERN ACT #205

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Bassam Twam, Murad Bishrat and Mohannad Seif, each aiding the other and acting in concert, committed the crime of **Money Laundering in the Fourth Degree** in violation of **Penal Law § 470.05(2)(a)(i)**, in that on or about September 22, 2012, in the County of Kings and elsewhere within the State of New York, and in the States of Delaware and Maryland, knowing that one or more monetary instruments, to wit, United States currency, represented the proceeds of criminal conduct, the defendants transported, transmitted, or transferred, or attempted to transport, transmit or transfer, on one or more occasions, monetary instruments which in fact represented the proceeds of specified criminal conduct, to wit, violation of N.Y. Tax L. §§ 481(2)(a) & 4, N.Y. Tax L. §§ 1814(a)(i) and (c)(2) and Enterprise Corruption, with intent to promote the carrying on of criminal conduct, and the total value of such monetary instrument or instruments exceeded ten thousand dollars.

PATTERN ACT #206

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Bassam Twam and Murad Bishrat, each aiding the other and acting in concert, committed the crime of **Money Laundering in the Fourth Degree** in violation of **Penal Law § 470.05(1)(a)(i)(A)**, in that on or about September 22, 2012, in the County of Kings and elsewhere within the State of New York, and in the States of Delaware and Maryland, knowing that the property, to wit, United States currency,

involved in one or more financial transactions represented the proceeds of criminal conduct, the defendants conducted one or more such financial transactions which in fact involved the proceeds of specified criminal conduct, to wit, violation of N.Y. Tax L. §§ 481(2)(a) & 4, N.Y. Tax L. §§ 1814(a)(i) and (c)(2) and Enterprise Corruption, with intent to promote the carrying on of criminal conduct, and the total value involved in such financial transaction or transactions exceeded five thousand dollars.

PATTERN ACT #207

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Bassam Twam and Murad Bishrat, each aiding the other and acting in concert, committed the crime of Attempt to **Evade or Defeat Cigarette and Tobacco Products Tax** in violation of **N.Y. Tax L. §§ 481(2)(a) & 4 and N.Y. Tax L. § 1814(a)(i)**, in that on or about and between September 28, 2012 and September 30, 2012, in the County of Kings and elsewhere within the State of New York, and in the States of Delaware and Maryland, did willfully attempt in any manner to evade or defeat the taxes imposed pursuant to New York State Tax Law or payment thereof on ten thousand or more cigarettes.

PATTERN ACT #208

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Bassam Twam and Murad Bishrat, each aiding the other and acting in concert, committed the crime of **Possession or Transport for the Purpose of Sale, or Sale or Offering For Sale, of Thirty Thousand or More Cigarettes in Unstamped or**

Unlawfully Stamped Packages in violation of **N.Y. Tax L. §§ 481(2)(a) & 4** and **N.Y. Tax L. § 1814(c)(2)**, in that on or about and between September 28, 2012 and September 30, 2012, in the County of Kings and elsewhere within the State of New York, and in the States of Delaware and Maryland, not being agents licensed by the Commissioner of the New York State Department of Taxation and Finance, did willfully possess or transport for the purpose of sale, thirty thousand or more cigarettes subject to the tax imposed pursuant to New York State Law in any unstamped or unlawfully stamped packages, and/or willfully sold or offered for sale thirty thousand or more cigarettes in any unstamped or unlawfully stamped packages.

PATTERN ACT #209

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Bassam Twam and Murad Bishrat, each aiding the other and acting in concert, committed the crime of **Money Laundering in the Third Degree** in violation of **Penal Law § 470.10(2)(b)(i)**, in that on or about and between September 28, 2012 and September 30, 2012, in the County of Kings and elsewhere within the State of New York, and in the States of Delaware and Maryland, knowing that one or more monetary instruments, to wit, United States currency, represented the proceeds of criminal conduct, the defendants transported, transmitted, or transferred, or attempted to transport, transmit or transfer, on one or more occasions, monetary instruments which in fact represented the proceeds of specified criminal conduct, to wit, violation of **N.Y. Tax L. §§ 481(2)(a) & 4**, **N.Y. Tax L. §§ 1814(a)(i) and (c)(2)** and Enterprise Corruption, from a place in any county in this state to or through a place outside that county or to a place in any county in

this state from or through a place outside that county, with intent to promote the carrying on of criminal conduct, and the total value of such monetary instrument or instruments exceeded fifty thousand dollars.

PATTERN ACT #210

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Bassam Twam and Murad Bishrat, each aiding the other and acting in concert, committed the crime of **Money Laundering in the Third Degree** in violation of **Penal Law § 470.10(1)(b)(i)(A)**, in that on or about and between September 28, 2012 and September 30, 2012, in the County of Kings and elsewhere within the State of New York, and in the States of Delaware and Maryland, knowing that the property, to wit, United States currency, involved in one or more financial transactions represented the proceeds of criminal conduct, the defendants conducted one or more such financial transactions which in fact involved the proceeds of specified criminal conduct, to wit, violation of N.Y. Tax L. §§ 481(2)(a) & 4, N.Y. Tax L. §§ 1814(a)(i) and (c)(2) and Enterprise Corruption, with intent to promote the carrying on of criminal conduct, and the total value involved in such financial transaction or transactions exceeded fifty thousand dollars.

PATTERN ACT #211

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Bassam Twam and Murad Bishrat, each aiding the other and acting in concert, committed the crime of **Attempt to Evade or Defeat Cigarette and Tobacco**

Products Tax in violation of **N.Y. Tax L. §§ 481(2)(a) & 4** and **N.Y. Tax L. § 1814(a)(i)**, in that on or about and between October 1, 2012 and October 6, 2012, in the County of Kings and elsewhere within the State of New York, and in the States of Delaware and Maryland, did willfully attempt in any manner to evade or defeat the taxes imposed pursuant to New York State Tax Law or payment thereof on ten thousand or more cigarettes.

PATTERN ACT #212

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Bassam Twam and Murad Bishrat, each aiding the other and acting in concert, committed the crime of **Possession or Transport for the Purpose of Sale, or Sale or Offering For Sale, of Thirty Thousand or More Cigarettes in Unstamped or Unlawfully Stamped Packages** in violation of **N.Y. Tax L. §§ 481(2)(a) & 4** and **N.Y. Tax L. § 1814(c)(2)**, in that on or about and between October 1, 2012 and October 6, 2012, in the County of Kings and elsewhere within the State of New York, and in the States of Delaware and Maryland, not being agents licensed by the Commissioner of the New York State Department of Taxation and Finance, did willfully possess or transport for the purpose of sale, thirty thousand or more cigarettes subject to the tax imposed pursuant to New York State Law in any unstamped or unlawfully stamped packages, and/or willfully sold or offered for sale thirty thousand or more cigarettes in any unstamped or unlawfully stamped packages.

PATTERN ACT #213

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Bassam Twam and Murad Bishrat, each aiding the other and acting in concert, committed the crime of **Money Laundering in the Third Degree** in violation of **Penal Law § 470.10(2)(b)(i)**, in that on or about and between October 1, 2012 and October 6, 2012, in the County of Kings and elsewhere within the State of New York, and in the States of Delaware and Maryland, knowing that one or more monetary instruments, to wit, United States currency, represented the proceeds of criminal conduct, the defendants transported, transmitted, or transferred, or attempted to transport, transmit or transfer, on one or more occasions, monetary instruments which in fact represented the proceeds of specified criminal conduct, to wit, violation of N.Y. Tax L. §§ 481(2)(a) & 4, N.Y. Tax L. §§ 1814(a)(i) and (c)(2) and Enterprise Corruption, from a place in any county in this state to or through a place outside that county or to a place in any county in this state from or through a place outside that county, with intent to promote the carrying on of criminal conduct, and the total value of such monetary instrument or instruments exceeded fifty thousand dollars.

PATTERN ACT #214

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Bassam Twam and Murad Bishrat, each aiding the other and acting in concert, committed the crime of **Money Laundering in the Third Degree** in violation of

Penal Law § 470.10(1)(b)(i)(A), in that on or about and between October 1, 2012 and October 6, 2012, in the County of Kings and elsewhere within the State of New York, and in the States of Delaware and Maryland, knowing that the property, to wit, United States currency, involved in one or more financial transactions represented the proceeds of criminal conduct, the defendants conducted one or more such financial transactions which in fact involved the proceeds of specified criminal conduct, to wit, violation of N.Y. Tax L. §§ 481(2)(a) & 4, N.Y. Tax L. §§ 1814(a)(i) and (c)(2) and Enterprise Corruption, with intent to promote the carrying on of criminal conduct, and the total value involved in such financial transaction or transactions exceeded fifty thousand dollars.

PATTERN ACT #215

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Ribhi Awawdeh, Mohamed Abed Alabed Awawdeh, a.k.a. Abu Samir, Yousseff Odeh, a.k.a. Abu Mahmoud, Issa Sulieman and Mohannad Seif, each aiding the other and acting in concert, committed the crime of **Attempt to Evade or Defeat Cigarette and Tobacco Products Tax** in violation of **N.Y. Tax L. §§ 481(2)(a) & 4 and N.Y. Tax L. § 1814(a)(i)**, in that on or about and between December 21 and December 22, 2012, in the County of Kings, County of Bronx and elsewhere within the State of New York, and in the States of Delaware, Maryland and New Jersey, did willfully attempt in any manner to evade or defeat the taxes imposed pursuant to New York State Tax Law or payment thereof on ten thousand or more cigarettes.

PATTERN ACT #216

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Ribhi Awawdeh, Mohamed Abed Alabed Awawdeh, a.k.a. Abu Samir, Yousseff Odeh, a.k.a. Abu Mahmoud, Issa Sulieman and Mohannad Seif, each aiding the other and acting in concert, committed the crime of **Possession or Transport for the Purpose of Sale, or Sale or Offering For Sale, of Thirty Thousand or More Cigarettes in Unstamped or Unlawfully Stamped Packages** in violation of N.Y. Tax L. §§ 481(2)(a) & 4 and N.Y. Tax L. § 1814(c)(2), in that on or about and between December 21, 2012 and December 22, 2012, in the County of Kings, County of Bronx and elsewhere within the State of New York, and in the States of Delaware, Maryland and New Jersey, not being agents licensed by the Commissioner of the New York State Department of Taxation and Finance, did willfully possess or transport for the purpose of sale, thirty thousand or more cigarettes subject to the tax imposed pursuant to New York State Law in any unstamped or unlawfully stamped packages, and/or willfully sold or offered for sale thirty thousand or more cigarettes in any unstamped or unlawfully stamped packages.

PATTERN ACT #217

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Ribhi Awawdeh, Mohamed Abed Alabed Awawdeh, a.k.a. Abu Samir, Yousseff Odeh, a.k.a. Abu Mahmoud, Issa Sulieman and Mohannad Seif, each aiding the other and acting in concert, committed the crime of **Money Laundering in the Third Degree** in violation of Penal

Law § 470.10(2)(b)(i), in that on or about and between December 21, 2012 and December 22, 2012, in the County of Kings, County of Bronx and elsewhere within the State of New York, and in the States of Delaware, Maryland and New Jersey, knowing that one or more monetary instruments, to wit, United States currency, represented the proceeds of criminal conduct, the defendants transported, transmitted, or transferred, or attempted to transport, transmit or transfer, on one or more occasions, monetary instruments which in fact represented the proceeds of specified criminal conduct, to wit, violation of N.Y. Tax L. §§ 481(2)(a) & 4, N.Y. Tax L. §§ 1814(a)(i) and (c)(2) and Enterprise Corruption, from a place in any county in this state to or through a place outside that county or to a place in any county in this state from or through a place outside that county, with intent to promote the carrying on of criminal conduct, and the total value of such monetary instrument or instruments exceeded fifty thousand dollars.

PATTERN ACT #218

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Ribhi Awawdeh, Mohamed Abed Alabed Awawdeh, a.k.a. Abu Samir, Yousseff Odeh, a.k.a. Abu Mahmoud, Issa Sulieman and Mohannad Seif, each aiding the other and acting in concert, committed the crime of **Money Laundering in the Third Degree** in violation of **Penal Law § 470.10(1)(b)(i)(A)**, in that on or about and between December 21, 2012 and December 22, 2012, in the County of Kings, County of Bronx and elsewhere within the State of New York, and in the States of Delaware, Maryland and New Jersey, knowing that the property, to wit, United States currency, involved in one or more financial

transactions represented the proceeds of criminal conduct, the defendants conducted one or more such financial transactions which in fact involved the proceeds of specified criminal conduct, to wit, violation of N.Y. Tax L. §§ 481(2)(a) & 4, N.Y. Tax L. §§ 1814(a)(i) and (c)(2) and Enterprise Corruption, with intent to promote the carrying on of criminal conduct, and the total value involved in such financial transaction or transactions exceeded fifty thousand dollars.

PATTERN ACT #219

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Issa Sulieman and Mohannad Seif, each aiding the other and acting in concert, committed the crime of **Attempt to Evade or Defeat Cigarette and Tobacco Products Tax** in violation of **N.Y. Tax L. §§ 481(2)(a) & 4 and N.Y. Tax L. § 1814(a)(i)**, in that on or about and between December 29, 2012 and January 3, 2013, in the County of Kings and elsewhere within the State of New York, and in the States of Delaware and Maryland, did willfully attempt in any manner to evade or defeat the taxes imposed pursuant to New York State Tax Law or payment thereof on ten thousand or more cigarettes.

PATTERN ACT #220

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Issa Sulieman and Mohannad Seif, each aiding the other and acting in concert, committed the crime of **Possession or Transport for the Purpose of Sale, or Sale or Offering For Sale, of Thirty Thousand or More Cigarettes in Unstamped or**

Unlawfully Stamped Packages in violation of **N.Y. Tax L. §§ 481(2)(a) & 4** and **N.Y. Tax L. § 1814(c)(2)**, in that on or about and between December 29, 2012 and January 3, 2013, in the County of Kings and elsewhere within the State of New York, and in the States of Delaware and Maryland and New Jersey, not being agents licensed by the Commissioner of the New York State Department of Taxation and Finance, did willfully possess or transport for the purpose of sale, thirty thousand or more cigarettes subject to the tax imposed pursuant to New York State Law in any unstamped or unlawfully stamped packages, and/or willfully sold or offered for sale thirty thousand or more cigarettes in any unstamped or unlawfully stamped packages.

PATTERN ACT #221

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Issa Sulieman and Mohannad Seif, each aiding the other and acting in concert, committed the crime of **Money Laundering in the Third Degree** in violation of **Penal Law § 470.10(2)(b)(i)**, in that on or about and between December 29, 2012 and January 3, 2013, in the County of Kings and elsewhere within the State of New York, and in the States of Delaware and Maryland, knowing that one or more monetary instruments, to wit, United States currency, represented the proceeds of criminal conduct, the defendants transported, transmitted, or transferred, or attempted to transport, transmit or transfer, on one or more occasions, monetary instruments which in fact represented the proceeds of specified criminal conduct, to wit, violation of **N.Y. Tax L. §§ 481(2)(a) & 4**, **N.Y. Tax L. §§ 1814(a)(i) and (c)(2)** and Enterprise Corruption, from a place in any county in this state to or through a place outside that county or to a place in any county in

this state from or through a place outside that county, with intent to promote the carrying on of criminal conduct, and the total value of such monetary instrument or instruments exceeded fifty thousand dollars.

PATTERN ACT #222

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Issa Sulieman and Mohannad Seif, each aiding the other and acting in concert, committed the crime of **Money Laundering in the Third Degree** in violation of **Penal Law § 470.10(1)(b)(i)(A)**, in that on or about and between December 29, 2012 and January 3, 2013, in the County of Kings and elsewhere within the State of New York, and in the States of Delaware and Maryland, knowing that the property involved in one or more financial transactions represented the proceeds of criminal conduct, the defendants conducted one or more such financial transactions which in fact involved the proceeds of specified criminal conduct, to wit, violation of N.Y. Tax L. §§ 481(2)(a) & 4, N.Y. Tax L. §§ 1814(a)(i) and (c)(2) and Enterprise Corruption, with intent to promote the carrying on of criminal conduct, and the total value involved in such financial transaction or transactions exceeded fifty thousand dollars.

PATTERN ACT #223

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Issa Sulieman and Mohannad Seif, each aiding the other and acting in concert, committed the crime of **Attempt to Evade or Defeat Cigarette and Tobacco Products Tax** in violation of **N.Y. Tax L. §§ 481(2)(a) & 4 and N.Y. Tax L. §**

1814(a)(i), in that on or about and between January 13, 2013 and January 14, 2013, in the County of Kings and elsewhere within the State of New York, and in the States of Delaware and Maryland, did willfully attempt in any manner to evade or defeat the taxes imposed pursuant to New York State Tax Law or payment thereof on ten thousand or more cigarettes.

PATTERN ACT #224

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Issa Sulieman and Mohannad Seif, each aiding the other and acting in concert, committed the crime of **Possession or Transport for the Purpose of Sale, or Sale or Offering For Sale, of Thirty Thousand or More Cigarettes in Unstamped or Unlawfully Stamped Packages** in violation of **N.Y. Tax L. §§ 481(2)(a) & 4 and N.Y. Tax L. § 1814(c)(2)**, in that on or about and between January 13, 2013 and January 14, 2013, in the County of Kings and elsewhere within the State of New York, and in the States of Delaware and Maryland, not being agents licensed by the Commissioner of the New York State Department of Taxation and Finance, did willfully possess or transport for the purpose of sale, thirty thousand or more cigarettes subject to the tax imposed pursuant to New York State Law in any unstamped or unlawfully stamped packages, and/or willfully sold or offered for sale thirty thousand or more cigarettes in any unstamped or unlawfully stamped packages.

PATTERN ACT #225

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu

Mahmoud, Issa Sulieman and Mohannad Seif, each aiding the other and acting in concert, committed the crime of **Money Laundering in the Third Degree** in violation of **Penal Law § 470.10(2)(b)(i)**, in that on or about and between January 13, 2013 and January 14, 2013, in the County of Kings and elsewhere within the State of New York, and in the States of Delaware and Maryland, knowing that one or more monetary instrument, to wit, United States currency, represented the proceeds of criminal conduct, the defendants transported, transmitted, or transferred, or attempted to transport, transmit or transfer, on one or more occasions, monetary instruments which in fact represented the proceeds of specified criminal conduct, to wit, violation of N.Y. Tax L. §§ 481(2)(a) & 4, N.Y. Tax L. §§ 1814(a)(i) and (c)(2) and Enterprise Corruption, from a place in any county in this state to or through a place outside that county or to a place in any county in this state from or through a place outside that county, with intent to promote the carrying on of criminal conduct, and the total value of such monetary instrument or instruments exceeded fifty thousand dollars.

PATTERN ACT #226

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Issa Sulieman and Mohannad Seif, each aiding the other and acting in concert, committed the crime of **Money Laundering in the Third Degree** in violation of **Penal Law § 470.10(1)(b)(i)(A)**, in that on or about and between January 13, 2013 and January 14, 2013, in the County of Kings and elsewhere within the State of New York, and in the States of Delaware and Maryland, knowing that the property, to wit, United States currency, involved in one or more financial transactions represented the proceeds

of criminal conduct, the defendants conducted one or more such financial transactions which in fact involved the proceeds of specified criminal conduct, to wit, violation of N.Y. Tax L. §§ 481(2)(a) & 4, N.Y. Tax L. §§ 1814(a)(i) and (c)(2) and Enterprise Corruption, with intent to promote the carrying on of criminal conduct, and the total value involved in such financial transaction or transactions exceeded fifty thousand dollars.

PATTERN ACT #227

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Issa Sulieman, Ribhi Awawdeh, Mohamed Abed Alabed Awawdeh, a.k.a. Abu Samir and Mohannad Seif, each aiding the other and acting in concert, committed the crime of **Attempt to Evade or Defeat Cigarette and Tobacco Products Tax** in violation of **N.Y. Tax L. §§ 481(2)(a) & 4 and N.Y. Tax L. § 1814(a)(i)**, in that on or about and between January 22, 2013 and January 24, 2013, in the County of Kings, County of Bronx and elsewhere within the State of New York, and in the States of Delaware, Maryland and New Jersey, did willfully attempt in any manner to evade or defeat the taxes imposed pursuant to New York State Tax Law or payment thereof on ten thousand or more cigarettes.

PATTERN ACT #228

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Issa Sulieman, Ribhi Awawdeh, Mohamed Abed Alabed Awawdeh, a.k.a. Abu Samir and Mohannad Seif, each aiding the other and acting in concert,

committed the crime of **Possession or Transport for the Purpose of Sale, or Sale or Offering For Sale, of Thirty Thousand or More Cigarettes in Unstamped or Unlawfully Stamped Packages** in violation of **N.Y. Tax L. §§ 481(2)(a) & 4 and N.Y. Tax L. § 1814(c)(2)**, in that on or about and between January 22, 2013 and January 24, 2013, in the County of Kings, County of Bronx and elsewhere within the State of New York, and in the States of Delaware, Maryland and New Jersey, not being agents licensed by the Commissioner of the New York State Department of Taxation and Finance, did willfully possess or transport for the purpose of sale, thirty thousand or more cigarettes subject to the tax imposed pursuant to New York State Law in any unstamped or unlawfully stamped packages, and/or willfully sold or offered for sale thirty thousand or more cigarettes in any unstamped or unlawfully stamped packages.

PATTERN ACT #229

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Issa Sulieman, Ribhi Awawdeh, Mohamed Abed Alabed Awawdeh, a.k.a. Abu Samir and Mohannad Seif, each aiding the other and acting in concert, committed the crime of **Money Laundering in the Third Degree** in violation of **Penal Law § 470.10(2)(b)(i)**, in that on or about and between January 22, 2013 and January 24, 2013, in the County of Kings, County of Bronx and elsewhere within the State of New York, and in the States of Delaware, Maryland and New Jersey, knowing that one or more monetary instruments, to wit, United States currency, represented the proceeds of criminal conduct, the defendants transported, transmitted, or transferred, or attempted to transport, transmit or transfer, on one or more occasions, monetary instruments which in

fact represented the proceeds of specified criminal conduct, to wit, violation of N.Y. Tax L. §§ 481(2)(a) & 4, N.Y. Tax L. §§ 1814(a)(i) and (c)(2) and Enterprise Corruption, from a place in any county in this state to or through a place outside that county or to a place in any county in this state from or through a place outside that county, with intent to promote the carrying on of criminal conduct, and the total value of such monetary instrument or instruments exceeded fifty thousand dollars.

PATTERN ACT #230

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Issa Sulieman, Ribhi Awawdeh, Mohamed Abed Alabed Awawdeh, a.k.a. Abu Samir and Mohannad Seif, each aiding the other and acting in concert, committed the crime of **Money Laundering in the Third Degree** in violation of **Penal Law § 470.10(1)(b)(i)(A)**, in that on or about and between January 22, 2013 and January 24, 2013, in the County of Kings, County of Bronx and elsewhere within the State of New York, and in the States of Delaware, Maryland and New Jersey, knowing that the property, to wit, United States currency, involved in one or more financial transactions represented the proceeds of criminal conduct, the defendants conducted one or more such financial transactions which in fact involved the proceeds of specified criminal conduct, to wit, violation of N.Y. Tax L. §§ 481(2)(a) & 4, N.Y. Tax L. §§ 1814(a)(i) and (c)(2) and Enterprise Corruption, with intent to promote the carrying on of criminal conduct, and the total value involved in such financial transaction or transactions exceeded fifty thousand dollars.

PATTERN ACT #231

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Issa Sulieman and Mohannad Seif, each aiding the other and acting in concert, committed the crime of **Attempt to Evade or Defeat Cigarette and Tobacco Products Tax** in violation of **N.Y. Tax L. §§ 481(2)(a) & 4 and N.Y. Tax L. § 1814(a)(i)**, in that on or about and between January 26, 2013 and January 30, 2013, in the County of Kings, County of Bronx and elsewhere within the State of New York, and in the States of Delaware, Maryland and New Jersey, did willfully attempt in any manner to evade or defeat the taxes imposed pursuant to New York State Tax Law or payment thereof on ten thousand or more cigarettes.

PATTERN ACT #232

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Issa Sulieman and Mohannad Seif, each aiding the other and acting in concert, committed the crime of **Possession or Transport for the Purpose of Sale, or Sale or Offering For Sale, of Thirty Thousand or More Cigarettes in Unstamped or Unlawfully Stamped Packages** in violation of **N.Y. Tax L. §§ 481(2)(a) & 4 and N.Y. Tax L. § 1814(c)(2)**, in that on or about and between January 26, 2013 and January 30, 2013, in the County of Kings and elsewhere within the State of New York, and in the States of Delaware and Maryland, not being agents licensed by the Commissioner of the New York State Department of Taxation and Finance, did willfully possess or transport for the purpose of sale, thirty thousand or more cigarettes subject to the tax imposed

pursuant to New York State Law in any unstamped or unlawfully stamped packages, and/or willfully sold or offered for sale thirty thousand or more cigarettes in any unstamped or unlawfully stamped packages.

PATTERN ACT #233

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Issa Sulieman and Mohannad Seif, each aiding the other and acting in concert, committed the crime of **Money Laundering in the Third Degree** in violation of **Penal Law § 470.10(2)(b)(i)**, in that on or about and between January 26, 2013 and January 30, 2013, in the County of Kings and elsewhere within the State of New York, and in the States of Delaware and Maryland, knowing that one or more monetary instruments, to wit, United States currency, represented the proceeds of criminal conduct, the defendants transported, transmitted, or transferred, or attempted to transport, transmit or transfer, on one or more occasions, monetary instruments which in fact represented the proceeds of specified criminal conduct, to wit, violation of N.Y. Tax L. §§ 481(2)(a) & 4, N.Y. Tax L. §§ 1814(a)(i) and (c)(2) and Enterprise Corruption, from a place in any county in this state to or through a place outside that county or to a place in any county in this state from or through a place outside that county, with intent to promote the carrying on of criminal conduct, and the total value of such monetary instrument or instruments exceeded fifty thousand dollars.

PATTERN ACT #234

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu

Mahmoud, Issa Sulieman and Mohannad Seif, each aiding the other and acting in concert, committed the crime of **Money Laundering in the Third Degree** in violation of **Penal Law § 470.10(1)(b)(i)(A)**, in that on or about and between January 26, 2013 and January 30, 2013, in the County of Kings and elsewhere within the State of New York, and in the States of Delaware and Maryland, knowing that the property, to wit, United States currency, involved in one or more financial transactions represented the proceeds of criminal conduct, the defendants conducted one or more such financial transactions which in fact involved the proceeds of specified criminal conduct, to wit, violation of N.Y. Tax L. §§ 481(2)(a) & 4, N.Y. Tax L. §§ 1814(a)(i) and (c)(2) and Enterprise Corruption, with intent to promote the carrying on of criminal conduct, and the total value involved in such financial transaction or transactions exceeded fifty thousand dollars.

PATTERN ACT #235

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud and Mohannad Seif, each aiding the other and acting in concert, committed the crime of **Attempt to Evade or Defeat Cigarette and Tobacco Products Tax** in violation of **N.Y. Tax L. §§ 481(2)(a) & 4 and N.Y. Tax L. § 1814(a)(i)**, in that on or about April 7, 2013, in the County of Kings and elsewhere within the State of New York, and in the States of Delaware and Maryland, did willfully attempt in any manner to evade or defeat the taxes imposed pursuant to New York State Tax Law or payment thereof on ten thousand or more cigarettes.

PATTERN ACT #236

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud and Mohannad Seif, each aiding the other and acting in concert, committed the crime of **Possession or Transport for the Purpose of Sale, or Sale or Offering For Sale, of Thirty Thousand or More Cigarettes in Unstamped or Unlawfully Stamped Packages** in violation of **N.Y. Tax L. §§ 481(2)(a) & 4 and N.Y. Tax L. § 1814(c)(2)**, in that on or about April 7, 2013, in the County of Kings and elsewhere within the State of New York, and in the States of Delaware and Maryland, not being agents licensed by the Commissioner of the New York State Department of Taxation and Finance, did willfully possess or transport for the purpose of sale, thirty thousand or more cigarettes subject to the tax imposed pursuant to New York State Law in any unstamped or unlawfully stamped packages, and/or willfully sold or offered for sale thirty thousand or more cigarettes in any unstamped or unlawfully stamped packages.

PATTERN ACT #237

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Issa Sulieman, Ribhi Awawdeh, Mohamed Abed Alabed Awawdeh, a.k.a. Abu Samir, Bassam Twam, Ahmad Abdelaziz, a.k.a. Al Jaba'I and Mohannad Seif, each aiding the other and acting in concert, committed the crime of **Attempt to Evade or Defeat Cigarette and Tobacco Products Tax** in violation of **N.Y. Tax L. §§ 481(2)(a) & 4 and N.Y. Tax L. § 1814(a)(i)**, in that on or about and between March 22, 2013 and March 23, 2013, in the County of Kings, County of Bronx and elsewhere within

the State of New York, and in the States of Delaware, Maryland and New Jersey, did willfully attempt in any manner to evade or defeat the taxes imposed pursuant to New York State Tax Law or payment thereof on ten thousand or more cigarettes.

PATTERN ACT #238

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Issa Sulieman, Ribhi Awawdeh, Mohamed Abed Alabed Awawdeh, a.k.a. Abu Samir, Bassam Twam, Ahmad Abdelaziz, a.k.a. Al Jaba'I and Mohannad Seif, each aiding the other and acting in concert, committed the crime of **Possession or Transport for the Purpose of Sale, or Sale or Offering For Sale, of Thirty Thousand or More Cigarettes in Unstamped or Unlawfully Stamped Packages** in violation of **N.Y. Tax L. §§ 481(2)(a) & 4 and N.Y. Tax L. § 1814(c)(2)**, in that on or about and between March 22, 2013 and March 23, 2013, between in the County of Kings, County of Bronx and elsewhere within the State of New York, and in the States of Delaware, Maryland and New Jersey, not being agents licensed by the Commissioner of the New York State Department of Taxation and Finance, did willfully possess or transport for the purpose of sale, thirty thousand or more cigarettes subject to the tax imposed pursuant to New York State Law in any unstamped or unlawfully stamped packages, and/or willfully sold or offered for sale thirty thousand or more cigarettes in any unstamped or unlawfully stamped packages.

PATTERN ACT #239

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu

Mahmoud, Issa Sulieman, Ribhi Awawdeh, Mohamed Abed Alabed Awawdeh, a.k.a. Abu Samir, Bassam Twam, Ahmad Abdelaziz, a.k.a. Al Jaba'I and Mohannad Seif, each aiding the other and acting in concert, committed the crime of **Money Laundering in the Third Degree** in violation of **Penal Law § 470.10(2)(b)(i)**, in that on or about and between March 22, 2013 and March 23, 2013, in the County of Kings, County of Bronx and elsewhere within the State of New York, and within the States of Delaware, Maryland and New Jersey, knowing that one or more monetary instruments, to wit, United States currency, represented the proceeds of criminal conduct, the defendants transported, transmitted, or transferred, or attempted to transport, transmit or transfer, on one or more occasions, monetary instruments which in fact represented the proceeds of specified criminal conduct, to wit, violation of N.Y. Tax L. § 481(2)(a) & 4 and N.Y. Tax L. §§ 1814(a)(i) and (c)(2) and Enterprise Corruption, from a place in any county in this state to or through a place outside that county or to a place in any county in this state from or through a place outside that county, with intent to promote the carrying on of criminal conduct, and the total value of such monetary instrument or instruments exceeded fifty thousand dollars.

PATTERN ACT #240

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Issa Sulieman, Ribhi Awawdeh, Mohamed Abed Alabed Awawdeh, a.k.a. Abu Samir, Bassam Twam, Ahmad Abdelaziz, a.k.a. Al Jaba'I and Mohannad

Seif, each aiding the other and acting in concert, committed the crime of **Money Laundering in the Third Degree** in violation of **Penal Law § 470.10(1)(b)(i)(A)**, in that on or about and between March 22, 2013 and March 23, 2013, in the County of Kings, County of Bronx and elsewhere within the State of New York, and within the States of Delaware, Maryland and New Jersey, knowing that the property, to wit, United States currency, involved in one or more financial transactions represented the proceeds of criminal conduct, the defendants conducted one or more such financial transactions which in fact involved the proceeds of specified criminal conduct, to wit, violation of N.Y. Tax L. § 481(2)(a) & 4 and N.Y. Tax L. §§ 1814 (a)(i) and (c)(2) and Enterprise Corruption, with intent to promote the carrying on of criminal conduct, and the total value involved in such financial transaction or transactions exceeded fifty thousand dollars.

PATTERN ACT #241

Defendants Basel Ramadan, a.k.a. Abu Salah and Samer Ramadan, a.k.a. Abu Mahdy, each aiding the other and acting in concert, committed the crime of **Money Laundering in the Second Degree** in violation of **Penal Law § 470.15(1)(b)(ii)(A)**, in that on or about and between September 2011, and December 2012, in the County of Kings and elsewhere within the State of New York and within the States of Delaware and Maryland, knowing that the property, to wit, United States currency, involved in one or more financial transactions represented the proceeds of specified criminal conduct, to wit, violation of N.Y. Tax L. § 481(2)(a) & 4 and N.Y. Tax L. §§ 1814 (a)(i) and (c)(2) and Enterprise Corruption, the defendants conducted one or more such financial transactions which in fact involved the proceeds of specified criminal conduct, knowing that the

transaction or transactions in whole or in part are designed to conceal or disguise the nature, location, the source, the ownership or control of the proceeds of specified criminal conduct, and the total value involved in such financial transaction or transactions exceeded one hundred thousand dollars.

PATTERN ACT #242

Defendants Basel Ramadan, a.k.a. Abu Salah and Samer Ramadan, a.k.a. Abu Mahdy, each aiding the other and acting in concert, committed the crime of **Money Laundering in the Second Degree** in violation of **Penal Law § 470.15(1)(b)(i)(A)**, in that on or about and between September 2011 and December 2012, in the County of Kings and elsewhere within the State of New York, and in the States of Delaware and Maryland, knowing that the property, to wit, United States currency, involved in one or more financial transactions represented the proceeds of criminal conduct, to wit, violation of N.Y. Tax L. §§ 481(a)(i) & 4, N.Y. Tax L. §§ 1814 (a)(i) and (c)(2) and Enterprise Corruption, the defendants conducted one or more such financial transactions which in fact involved the proceeds of specified criminal conduct with intent to promote the carrying on of criminal conduct, and the total value involved in such financial transaction or transactions exceeded one hundred thousand dollars.

PATTERN ACT #243

Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Issa Sulieman, Mufeed Attal, a.k.a. Abu Saleem, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali, Munther Mahmoud, Nabil Saad Badr, a.k.a. Abu Nabil, Ahmad Abdelaziz, a.k.a. Al Jaba'I, Ribhi Awawdeh, Mohamed Abed Alabed

Awawdeh, a.k.a. Abu Samir, Bassam Twam, Murad Bishrat, Mohannad Seif, Muaffaq Askar, each aiding the other and acting in concert with each other and others known and unknown to the Grand Jury, committed the crime of Conspiracy in the fifth degree in violation of **Penal Law Section 105.05(1)**, committed as follows:

The defendants, from on or about and between September 2011 and May 10, 2013, in **Kings County, Bronx County** and elsewhere within the State of New York and the States of Delaware, Maryland and New Jersey, with intent that conduct constituting a felony be performed, to wit: **Attempt to Evade or Defeat Cigarette and Tobacco Products Tax** in violation of **N.Y. Tax L. §481(2)(a) & 4** and **N.Y. Tax L. § 1814(a)(i)**, agreed with one or more persons to engage in or cause the performance of such conduct.

OVERT ACTS

In furtherance of said conspiracy and to effect the objects thereof, and during the course thereof, the following overt acts, among others, were committed:

On October 23, 2012, **Mohannad Seif** and **Bassam Twam** had a telephone conversation in which Seif told Twam he was counting money for untaxed cigarettes.

On October 23, 2012, **Mohannad Seif** and **Bassam Twam** met and Twam gave Seif bags containing untaxed cigarettes.

On November 3, 2012, **Munther Mahmoud** and **Basel Ramadan, a.k.a. Abu Salah** had a telephone conversation in which Mahmoud discussed the balance of money he owed to Ramadan for untaxed cigarettes.

On November 3, 2012, **Saad Badr, a.k.a. Abu Nabil** and **Basel Ramadan, a.k.a. Abu Salah** had a telephone conversation in which Badr discussed the money he owed to

Ramadan for untaxed cigarettes, and Ramadan confirmed that Badr had just received over 30,000 untaxed cigarettes.

On December 26, 2012, **Mufeed Attal, a.k.a. Abu Saleem,** and **Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali,** had a telephone conversation in which Nimer advised Attal that he brought in excess of 30,000 untaxed cigarettes.

On Decemer 26, 2012, **Murad Bishrat** sent a text message to **Mufeed Attal, a.k.a. Abu Saleem,** that read: 118 Marlboro and 344 Newport.

On December 26, 2012, **Murad Bishrat** had a telephone conversation with **Mufeed Attal, a.k.a. Abu Saleem** to confirm Attal received his order for untaxed cigarettes.

On January 22, 2013, **Ribhi Awawdeh** and **Adela Buzahrieh, a.k.a. Adel Abu Zahrieh,** had a telephone conversation in which Ribhi Awawdeh stated he wanted to order 1000 cartons of untaxed cigarettes for himself and another 1000 cartons of untaxed cigarettes for his brother.

On February 1, 2013, **Basel Ramadan, a.k.a. Abu Salah** and **Yousseff Odeh, a.k.a. Abu Mahmoud,** had a telephone conversation in which Odeh ordered in excess of 30,000 untaxed cigarettes from Basel Ramadan.

On February 10, 2013, **Ahmad Abdelaziz, a.k.a. Al Jaba'I** and **Adela Buzahrieh, a.k.a. Adel Abu Zahrieh** had a telephone conversation in which Ahmad Abdelaziz told Adela Buzahrieh that he wanted to order 1800 cartons of untaxed cigarettes.

On March 6, 2013, **Mohamed Abed Alabed Awawdeh** and **Adela Buzahrieh, a.k.a. Adel Abu Zahrieh** met up and **Adel Abu Zahrieh** delivered untaxed cigarettes to Awawdeh.

On March 11, 2013, **Samer Ramadan, a.k.a. Abu Mahdy** and **Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali** had a telephone conversation in which Nimer ordered in excess of 30,000 untaxed cigarettes from Samer Ramadan.

On March 15, 2013, **Muaffaq Askar** and **Issa Sulieman** had a telephone conversation in which Askar ordered a quantity of untaxed cigarettes from Sulieman.

On March 30, 2013, **Basel Ramadan, a.k.a. Abu Salah** was present at a storage facility located at Dagsboro, Delaware.

COUNT TWO

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Issa Sulieman, Ahmad Abdelaziz, a.k.a. Al Jaba'I, Ribhi Awawdeh and Mohamed Abed Alabed Awawdeh, a.k.a. Abu Samir, each aiding the other and acting in concert, of the crime of Attempt to Evade or Defeat Cigarette and Tobacco Products Tax in violation of N.Y. Tax L. § 481(2)(a) & 4 and N.Y. Tax L. § 1814(a)(i), in that on or about and between January 31 and February 2, 2013, in the County of Kings, did willfully attempt in any manner to evade or defeat the taxes imposed pursuant to New York State Tax Law or payment thereof on ten thousand (10,000) or more cigarettes.

COUNT THREE

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Issa Sulieman, Ahmad Abdelaziz, a.k.a. Al Jaba'I, Ribhi Awawdeh and Mohamed Abed Alabed Awawdeh, a.k.a. Abu Samir, each aiding the other and acting in concert, of the crime of Possession or Transport for the Purpose of Sale, or Sale or Offering For Sale, of Thirty Thousand or More Cigarettes in Unstamped or Unlawfully Stamped Packages in violation of N.Y. Tax L. § 481(2)(a) & 4 and N.Y. Tax L. § 1814(c)(2), in that on or about and between January 31 and February 2, 2013, in the County of Kings, not being agents licensed by the Commissioner of the New York State Department of Taxation and Finance, did willfully possess or transport for the purpose of sale, thirty thousand (30,000) or more cigarettes subject to the tax imposed pursuant to New York State Law in any unstamped or unlawfully stamped packages, and/or willfully sold or offered for sale thirty thousand (30,000) or more cigarettes in any unstamped or unlawfully stamped packages.

COUNT FOUR

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Issa Sulieman, Ahmad Abdelaziz, a.k.a. Al Jaba'I, Ribhi Awawdeh and Mohamed Abed Alabed Awawdeh, a.k.a. Abu Samir, each aiding the other and acting in concert, of the crime of Money Laundering in the Third Degree in violation of

Penal Law § 470.10(2)(b)(i), in that on or about and between January 31 and February 2, 2013, in the County of Kings, knowing that one or more monetary instruments represented the proceeds of criminal conduct, the defendants transported, transmitted, or transferred, or attempted to transport, transmit or transfer, on one or more occasions, monetary instruments which in fact represented the proceeds of specified criminal conduct, as that term is defined in Article 470 of the Penal Law, from a place in any county in this state to or through a place outside that county or to a place in any county in this state from or through a place outside that county, with intent to promote the carrying on of criminal conduct, and the total value of such monetary instrument or instruments exceeded fifty thousand dollars.

COUNT FIVE

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Issa Sulieman, Ahmad Abdelaziz, a.k.a. Al Jaba'I, Ribhi Awawdeh and Mohamed Abed Alabed Awawdeh, a.k.a. Abu Samir, each aiding the other and acting in concert, of the crime of Money Laundering in the Third Degree in violation of Penal Law § 470.10(1)(b)(i)(A), in that on or about and between January 31 and February 2, 2013, in the County of Kings, knowing that the property involved in one or more financial transactions represented the proceeds of criminal conduct, the defendants conducted one or more such financial transactions which in fact involved the proceeds of specified criminal conduct, as that term is defined under Article 470 of the

Penal Law, with intent to promote the carrying on of criminal conduct, and the total value involved in such financial transaction or transactions exceeded fifty thousand dollars.

COUNT SIX

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Issa Sulieman, Bassam Twam, Ahmad Abdelaziz, a.k.a. Al Jaba'I, Ribhi Awawdeh, Mohamed Abed Alabed Awawdeh, a.k.a. Abu Samir and Muaffaq Askar, each aiding the other and acting in concert, of the crime of Attempt to Evade or Defeat Cigarette and Tobacco Products Tax in violation of N.Y. Tax L. §481(2)(a) & 4 and N.Y. Tax L. § 1814(a)(i), in that on or about and between March 12 and March 14, 2013, in the County of Kings, did willfully attempt in any manner to evade or defeat the taxes imposed pursuant to New York State Tax Law or payment thereof on ten thousand (10,000) or more cigarettes.

COUNT SEVEN

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Issa Sulieman, Bassam Twam, Ahmad Abdelaziz, a.k.a. Al Jaba'I, Ribhi Awawdeh, Mohamed Abed Alabed Awawdeh, a.k.a. Abu Samir and Muaffaq Askar, each aiding the other and acting in concert, of the crime of Possession or Transport for the Purpose of Sale, or Sale or Offering For Sale, of Thirty Thousand or More Cigarettes in Unstamped or Unlawfully Stamped Packages in violation of

N.Y. Tax L. §481(2)(a) & 4 and N.Y. Tax L. § 1814(c)(2), in that on or about and between March 12 and March 14, 2013, in the County of Kings, not being agents licensed by the Commissioner of the New York State Department of Taxation and Finance, did willfully possess or transport for the purpose of sale, thirty thousand (30,000) or more cigarettes subject to the tax imposed pursuant to New York State Law in any unstamped or unlawfully stamped packages, and/or willfully sold or offered for sale thirty thousand (30,000) or more cigarettes in any unstamped or unlawfully stamped packages.

COUNT EIGHT

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Issa Sulieman, Bassam Twam, Ahmad Abdelaziz, a.k.a. Al Jaba'I, Ribhi Awawdeh, Mohamed Abed Alabed Awawdeh, a.k.a. Abu Samir and Muaffaq Askar, each aiding the other and acting in concert, of the crime of Money Laundering in the Third Degree in violation of **Penal Law § 470.10(2)(b)(i)**, in that on or about and between March 12 and March 14, 2013, in the County of Kings, knowing that one or more monetary instruments represented the proceeds of criminal conduct, the defendants transported, transmitted, or transferred, or attempted to transport, transmit or transfer, on one or more occasions, monetary instruments which in fact represented the proceeds of specified criminal conduct, as that term is defined in Article 470 of the Penal Law, from a place in any county in this state to or through a place outside that county or to a place in

any county in this state from or through a place outside that county, with intent to promote the carrying on of criminal conduct, and the total value of such monetary instrument or instruments exceeded fifty thousand dollars.

COUNT NINE

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Issa Sulieman, Bassam Twam, Ahmad Abdelaziz, a.k.a. Al Jaba'I, Ribhi Awawdeh, Mohamed Abed Alabed Awawdeh, a.k.a. Abu Samir and Muaffaq Askar, each aiding the other and acting in concert, of the crime of Money Laundering in the Third Degree in violation of Penal Law § 470.10(1)(b)(i)(A), in that on or about and between March 12 and March 14, 2013, knowing that the property involved in one or more financial transactions represented the proceeds of criminal conduct, the defendants conducted one or more such financial transactions which in fact involved the proceeds of specified criminal conduct, as that term is defined under Article 470 of the Penal Law, with intent to promote the carrying on of criminal conduct, and the total value involved in such financial transaction or transactions exceeded fifty thousand dollars.

COUNT TEN

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu Saleem, each aiding the other and acting in concert, of the crime of Attempt to Evade or Defeat Cigarette and Tobacco Products Tax in violation of N.Y. Tax L.

§481(2)(a) & 4 and N.Y. Tax L. § 1814(a)(i), in that on or about March 11, 2013, in the County of Kings, did willfully attempt in any manner to evade or defeat the taxes imposed pursuant to New York State Tax Law or payment thereof on ten thousand (10,000) or more cigarettes.

COUNT ELEVEN

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu Saleem, each aiding the other and acting in concert, of the crime of **Possession or Transport for the Purpose of Sale, or Sale or Offering For Sale, of Thirty Thousand or More Cigarettes in Unstamped or Unlawfully Stamped Packages** in violation of **N.Y. Tax L. §481(2)(a) & 4 and N.Y. Tax L. § 1814(c)(2)**, in that on or about March 11, 2013, in the County of Kings, not being agents licensed by the Commissioner of the New York State Department of Taxation and Finance, did willfully possess or transport for the purpose of sale, thirty thousand (30,000) or more cigarettes subject to the tax imposed pursuant to New York State Law in any unstamped or unlawfully stamped packages, and/or willfully sold or offered for sale thirty thousand (30,000) or more cigarettes in any unstamped or unlawfully stamped packages.

COUNT TWELVE

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants, Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu Saleem, each aiding the other and acting in concert, of the crime of **Money**

Laundering in the Fourth Degree in violation of **Penal Law § 470.05(2)(a)(i)**, in that on or about March 11, 2013, in the County of Kings, knowing that one or more monetary instruments represented the proceeds of criminal conduct, the defendants transported, transmitted, or transferred, on one or more occasions, monetary instruments which in fact represented the proceeds of specified criminal conduct, as that term is defined in Article 470 of the Penal Law, with intent to promote the carrying on of criminal conduct, and the total value of such monetary instrument or instruments exceeded ten thousand dollars.

COUNT THIRTEEN

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu Saleem, each aiding the other and acting in concert, of the crime of **Money Laundering in the Fourth Degree** in violation of **Penal Law § 470.05(1)(a)(i)(A)**, in that on or about March 11, 2013, in the County of Kings, knowing that the property involved in one or more financial transactions represented the proceeds of criminal conduct, the defendants conducted one or more such financial transactions which in fact involved the proceeds of specified criminal conduct, as that term is defined under Article 470 of the Penal Law, with intent to promote the carrying on of criminal conduct, and the total value involved in such financial transaction or transactions exceeded five thousand dollars.

COUNT FOURTEEN

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu Saleem, each aiding the other and acting in concert, of the crime of Attempt to Evade or Defeat Cigarette and Tobacco Products Tax in violation of N.Y. Tax L. §481(2)(a) & 4 and N.Y. Tax L. § 1814(a)(i), in that on or about March 3, 2013, in the County of Kings, did willfully attempt in any manner to evade or defeat the taxes imposed pursuant to New York State Tax Law or payment thereof on ten thousand (10,000) or more cigarettes.

COUNT FIFTEEN

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu Saleem, each aiding the other and acting in concert, of the crime of Possession or Transport for the Purpose of Sale, or Sale or Offering For Sale, of Thirty Thousand or More Cigarettes in Unstamped or Unlawfully Stamped Packages in violation of N.Y. Tax L. §481(2)(a) & 4 and N.Y. Tax L. § 1814(c)(2), in that on or about March 3, 2013, in the County of Kings, not being agents licensed by the Commissioner of the New York State Department of Taxation and Finance, did willfully possess or transport for the purpose of sale, thirty thousand (30,000) or more cigarettes subject to the tax imposed pursuant to New York State Law in any unstamped or unlawfully stamped packages,

and/or willfully sold or offered for sale thirty thousand (30,000) or more cigarettes in any unstamped or unlawfully stamped packages.

COUNT SIXTEEN

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu Saleem, each aiding the other and acting in concert, of the crime of Money Laundering in the Third Degree in violation of Penal Law § 470.10(2)(b)(i), in that on or about March 3, 2013, in the County of Kings, knowing that one or more monetary instruments represented the proceeds of criminal conduct, the defendants transported, transmitted, or transferred, or attempted to transport, transmit or transfer, on one or more occasions, monetary instruments which in fact represented the proceeds of specified criminal conduct, as that term is defined in Article 470 of the Penal Law, from a place in any county in this state to or through a place outside that county or to a place in any county in this state from or through a place outside that county, with intent to promote the carrying on of criminal conduct, and the total value of such monetary instrument or instruments exceeded fifty thousand dollars.

COUNT SEVENTEEN

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu Saleem, each aiding the other and acting in concert, of the crime of Money Laundering in the Third Degree in violation of Penal Law § 470.10(1)(b)(i)(A), in

that on or about March 3, 2013, in the County of Kings, knowing that the property involved in one or more financial transactions represented the proceeds of criminal conduct, the defendants conducted one or more such financial transactions which in fact involved the proceeds of specified criminal conduct, as that term is defined under Article 470 of the Penal Law, with intent to promote the carrying on of criminal conduct, and the total value involved in such financial transaction or transactions exceeded fifty thousand dollars.

COUNT EIGHTEEN

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu Saleem, each aiding the other and acting in concert, of the crime of Attempt to Evade or Defeat Cigarette and Tobacco Products Tax in violation of N.Y. Tax L. §481(2)(a) & 4 and N.Y. Tax L. § 1814(a)(i), in that on or about March 12, 2013, in the County of Kings, did willfully attempt in any manner to evade or defeat the taxes imposed pursuant to New York State Tax Law or payment thereof on ten thousand (10,000) or more cigarettes.

COUNT NINETEEN

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants, Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu Saleem, each aiding the other and acting in concert, of the crime of Possession or Transport for the Purpose of Sale, or Sale or Offering For Sale, of Thirty Thousand

or More Cigarettes in Unstamped or Unlawfully Stamped Packages in violation of **N.Y. Tax L. §481(2)(a) & 4** and **N.Y. Tax L. § 1814(c)(2)**, in that on or about March 12, 2013, in the County of Kings, not being agents licensed by the Commissioner of the New York State Department of Taxation and Finance, did willfully possess or transport for the purpose of sale, thirty thousand (30,000) or more cigarettes subject to the tax imposed pursuant to New York State Law in any unstamped or unlawfully stamped packages, and/or willfully sold or offered for sale thirty thousand (30,000) or more cigarettes in any unstamped or unlawfully stamped packages.

COUNT TWENTY

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu Saleem, each aiding the other and acting in concert, of the crime of **Money Laundering in the Third Degree** in violation of **Penal Law § 470.10(2)(b)(i)**, in that on or about March 12, 2013, in the County of Kings, knowing that one or more monetary instruments represented the proceeds of criminal conduct, the defendants transported, transmitted, or transferred, or attempted to transport, transmit or transfer, on one or more occasions, monetary instruments which in fact represented the proceeds of specified criminal conduct, as that term is defined in Article 470 of the Penal Law, from a place in any county in this state to or through a place outside that county or to a place in any county in this state from or through a place outside that county, with intent to promote the carrying on of criminal conduct, and the total value of such monetary instrument or instruments exceeded fifty thousand dollars.

COUNT TWENTY-ONE

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu Saleem, each aiding the other and acting in concert, of the crime of **Money Laundering in the Third Degree** in violation of **Penal Law § 470.10(1)(b)(i)(A)**, in that on or about March 12, 2013, in the County of Kings, knowing that the property involved in one or more financial transactions represented the proceeds of criminal conduct, the defendants conducted one or more such financial transactions which in fact involved the proceeds of specified criminal conduct, as that term is defined under Article 470 of the Penal Law, with intent to promote the carrying on of criminal conduct, and the total value involved in such financial transaction or transactions exceeded fifty thousand dollars.

COUNT TWENTY-TWO

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Issa Sulieman, Bassam Twam, Ribhi Awawdeh and Mohamed Abed Alabed Awawdeh, a.k.a. Abu Samir, each aiding the other and acting in concert, of the crime of **Attempt to Evade or Defeat Cigarette and Tobacco Products Tax** in violation of **N.Y. Tax L. §481(2)(a) & 4** and **N.Y. Tax L. § 1814(a)(i)**, in that on or about March 27, 2013, in the County of Kings, did willfully attempt in any manner to evade or defeat the taxes imposed pursuant to New York State Tax Law or payment thereof on ten thousand (10,000) or more cigarettes.

COUNT TWENTY-THREE

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Issa Sulieman, Bassam Twam, Ribhi Awawdeh and Mohamed Abed Alabed Awawdeh, a.k.a. Abu Samir, each aiding the other and acting in concert, of the crime of Possession or Transport for the Purpose of Sale, or Sale or Offering For Sale, of Thirty Thousand or More Cigarettes in Unstamped or Unlawfully Stamped Packages in violation of N.Y. Tax L. §481(2)(a) & 4 and N.Y. Tax L. § 1814(c)(2), in that on or about March 27, 2013, in the County of Kings, not being agents licensed by the Commissioner of the New York State Department of Taxation and Finance, did willfully possess or transport for the purpose of sale, thirty thousand (30,000) or more cigarettes subject to the tax imposed pursuant to New York State Law in any unstamped or unlawfully stamped packages, and/or willfully sold or offered for sale thirty thousand (30,000) or more cigarettes in any unstamped or unlawfully stamped packages.

COUNT TWENTY-FOUR

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Issa Sulieman, Bassam Twam, Ribhi Awawdeh and Mohamed Abed Alabed Awawdeh, a.k.a. Abu Samir, each aiding the other and acting in concert, of the crime of Money Laundering in the Third Degree in violation of Penal Law §

470.10(2)(b)(i), in that on or about March 27, 2013, in the County of Kings, knowing that one or more monetary instruments represented the proceeds of criminal conduct, the defendants transported, transmitted, or transferred, or attempted to transport, transmit or transfer, on one or more occasions, monetary instruments which in fact represented the proceeds of specified criminal conduct, as that term is defined in Article 470 of the Penal Law, from a place in any county in this state to or through a place outside that county or to a place in any county in this state from or through a place outside that county, with intent to promote the carrying on of criminal conduct, and the total value of such monetary instrument or instruments exceeded fifty thousand dollars.

COUNT TWENTY-FIVE

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Issa Sulieman, Bassam Twam, Ribhi Awawdeh and Mohamed Abed Alabed Awawdeh, a.k.a. Abu Samir, each aiding the other and acting in concert, of the crime of Money Laundering in the Third Degree in violation of Penal Law § 470.10(1)(b)(i)(A), in that on or about March 27, 2013, in the County of Kings, knowing that the property involved in one or more financial transactions represented the proceeds of criminal conduct, the defendants conducted one or more such financial transactions which in fact involved the proceeds of specified criminal conduct, as that term is defined under Article 470 of the Penal Law, with intent to promote the carrying on of criminal

conduct, and the total value involved in such financial transaction or transactions exceeded fifty thousand dollars.

COUNT TWENTY-SIX

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Issa Sulieman, Bassam Twam, Ahmad Abdelaziz, a.k.a. Al Jaba'I, Ribhi Awawdeh and Mohamed Abed Alabed Awawdeh, a.k.a. Abu Samir, each aiding the other and acting in concert, of the crime of Attempt to Evade or Defeat Cigarette and Tobacco Products Tax in violation of N.Y. Tax L. §481(2)(a) & 4 and N.Y. Tax L. § 1814(a)(i), in that on or about and between March 28 and March 30, 2013, in the County of Kings, did willfully attempt in any manner to evade or defeat the taxes imposed pursuant to New York State Tax Law or payment thereof on ten thousand (10,000) or more cigarettes.

COUNT TWENTY-SEVEN

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Issa Sulieman, Bassam Twam, Ahmad Abdelaziz, a.k.a. Al Jaba'I, Ribhi Awawdeh and Mohamed Abed Alabed Awawdeh, a.k.a. Abu Samir, each aiding the other and acting in concert, of the crime of Possession or Transport for the Purpose of Sale, or Sale or Offering For Sale, of Thirty Thousand or More Cigarettes in Unstamped or Unlawfully Stamped Packages in violation of N.Y. Tax L. §481(2)(a)

& 4 and N.Y. Tax L. § 1814(c)(2), in that on or about and between March 28 and March 30, 2013, in the County of Kings, not being agents licensed by the Commissioner of the New York State Department of Taxation and Finance, did willfully possess or transport for the purpose of sale, thirty thousand (30,000) or more cigarettes subject to the tax imposed pursuant to New York State Law in any unstamped or unlawfully stamped packages, and/or willfully sold or offered for sale thirty thousand (30,000) or more cigarettes in any unstamped or unlawfully stamped packages.

COUNT TWENTY-EIGHT

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Issa Sulieman, Bassam Twam, Ahmad Abdelaziz, a.k.a. Al Jaba'I, Ribhi Awawdeh and Mohamed Abed Alabed Awawdeh, a.k.a. Abu Samir, each aiding the other and acting in concert, of the crime of Money Laundering in the Third Degree in violation of Penal Law § 470.10(2)(b)(i), in that on or about and between March 28 and March 30, 2013, in the County of Kings, knowing that one or more monetary instruments represented the proceeds of criminal conduct, the defendants transported, transmitted, or transferred, or attempted to transport, transmit or transfer, on one or more occasions, monetary instruments which in fact represented the proceeds of specified criminal conduct, as that term is defined in Article 470 of the Penal Law, from a place in any county in this state to or through a place outside that county or to a place in any county in this state from or through a place outside that county, with intent to promote the carrying

on of criminal conduct, and the total value of such monetary instrument or instruments exceeded fifty thousand dollars.

COUNT TWENTY-NINE

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Issa Sulieman, Bassam Twam, Ahmad Abdelaziz, a.k.a. Al Jaba'I, Ribhi Awawdeh and Mohamed Abed Alabed Awawdeh, a.k.a. Abu Samir, each aiding the other and acting in concert, of the crime of Money Laundering in the Third Degree in violation of Penal Law § 470.10(1)(b)(i)(A), in that on or about and between March 28 and March 30, 2013, in the County of Kings, knowing that the property involved in one or more financial transactions represented the proceeds of criminal conduct, the defendants conducted one or more such financial transactions which in fact involved the proceeds of specified criminal conduct, as that term is defined under Article 470 of the Penal Law, with intent to promote the carrying on of criminal conduct, and the total value involved in such financial transaction or transactions exceeded fifty thousand dollars.

COUNT THIRTY

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Munther Mahmoud, Bassam Twam, Murad Bishrat and Mohannad Seif, each aiding the other and acting in concert, of the crime of Attempt to Evade or Defeat Cigarette and Tobacco Products Tax in violation of N.Y. Tax L. §481(2)(a) &

4 and N.Y. Tax L. § 1814(a)(i), in that on or about and between October 21 and October 28, 2012, in the County of Kings, did willfully attempt in any manner to evade or defeat the taxes imposed pursuant to New York State Tax Law or payment thereof on ten thousand (10,000) or more cigarettes.

COUNT THIRTY-ONE

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Munther Mahmoud, Bassam Twam, Murad Bishrat and Mohannad Seif, each aiding the other and acting in concert, of the crime of **Possession or Transport for the Purpose of Sale, or Sale or Offering For Sale, of Thirty Thousand or More Cigarettes in Unstamped or Unlawfully Stamped Packages** in violation of **N.Y. Tax L. §481(2)(a) & 4 and N.Y. Tax L. § 1814(c)(2)**, in that on or about and between October 21 and October 28, 2012, in the County of Kings, not being agents licensed by the Commissioner of the New York State Department of Taxation and Finance, did willfully possess or transport for the purpose of sale, thirty thousand (30,000) or more cigarettes subject to the tax imposed pursuant to New York State Law in any unstamped or unlawfully stamped packages, and/or willfully sold or offered for sale thirty thousand (30,000) or more cigarettes in any unstamped or unlawfully stamped packages.

COUNT THIRTY-TWO

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Munther Mahmoud, Bassam Twam, Murad Bishrat and Mohannad

Seif, each aiding the other and acting in concert, of the crime of **Money Laundering in the Third Degree** in violation of **Penal Law § 470.10(2)(b)(i)**, in that on or about and between October 21 and October 28, 2012, in the County of Kings, knowing that one or more monetary instruments represented the proceeds of criminal conduct, the defendants transported, transmitted, or transferred, or attempted to transport, transmit or transfer, on one or more occasions, monetary instruments which in fact represented the proceeds of specified criminal conduct, as that term is defined in Article 470 of the Penal Law, from a place in any county in this state to or through a place outside that county or to a place in any county in this state from or through a place outside that county, with intent to promote the carrying on of criminal conduct, and the total value of such monetary instrument or instruments exceeded fifty thousand dollars.

COUNT THIRTY-THREE

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Munther Mahmoud, Bassam Twam, Murad Bishrat and Mohannad Seif, each aiding the other and acting in concert, of the crime of **Money Laundering in the Third Degree** in violation of **Penal Law § 470.10(1)(b)(i)(A)**, in that on or about and between October 21 and October 28, 2012, in the County of Kings, knowing that the property involved in one or more financial transactions represented the proceeds of criminal conduct, the defendants conducted one or more such financial transactions which in fact involved the proceeds of specified criminal conduct, as that term is defined under Article 470 of the Penal Law, with intent to promote the carrying on of criminal

conduct, and the total value involved in such financial transaction or transactions exceeded fifty thousand dollars.

COUNT THIRTY-FOUR

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Munther Mahmoud and Nabil Saad Badr, a.k.a. Abu Nabil, each aiding the other and acting in concert, of the crime of Possession or Transport for the Purpose of Sale, or Sale or Offering For Sale, of Thirty Thousand or More Cigarettes in Unstamped or Unlawfully Stamped Packages in violation of N.Y. Tax L. §481(2)(a) & 4 and N.Y. Tax L. § 1814(c)(2), in that on or about October 31, 2012, in the County of Kings, not being agents licensed by the Commissioner of the New York State Department of Taxation and Finance, did willfully possess or transport for the purpose of sale, thirty thousand (30,000) or more cigarettes subject to the tax imposed pursuant to New York State Law in any unstamped or unlawfully stamped packages, and/or willfully sold or offered for sale thirty thousand (30,000) or more cigarettes in any unstamped or unlawfully stamped packages.

COUNT THIRTY-FIVE

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Munther Mahmoud and Nabil Saad Badr, a.k.a. Abu Nabil, each aiding the other and acting in concert, of the crime of Attempt to Evade or Defeat Cigarette and Tobacco Products Tax in violation of N.Y. Tax L. §481(2)(a) & 4 and N.Y. Tax L. § 1814(a)(i), in that on or about October 31, 2012, in the County of Kings,

did willfully attempt in any manner to evade or defeat the taxes imposed pursuant to New York State Tax Law or payment thereof on ten thousand (10,000) or more cigarettes.

COUNT THIRTY-SIX

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Munther Mahmoud and Nabil Saad Badr, a.k.a. Abu Nabil, each aiding the other and acting in concert, of the crime of Possession or Transport for the Purpose of Sale, or Sale or Offering For Sale, of Thirty Thousand or More Cigarettes in Unstamped or Unlawfully Stamped Packages in violation of N.Y. Tax L. §481(2)(a) & 4 and N.Y. Tax L. § 1814(c)(2), in that on or about November 1, 2012, in the County of Kings, not being agents licensed by the Commissioner of the New York State Department of Taxation and Finance, did willfully possess or transport for the purpose of sale, thirty thousand (30,000) or more cigarettes subject to the tax imposed pursuant to New York State Law in any unstamped or unlawfully stamped packages, and/or willfully sold or offered for sale thirty thousand (30,000) or more cigarettes in any unstamped or unlawfully stamped packages.

COUNT THIRTY-SEVEN

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Munther Mahmoud and Nabil Saad Badr, a.k.a. Abu Nabil, each aiding the other and acting in concert, of the crime of Attempt to Evade or Defeat Cigarette and Tobacco Products Tax in violation of N.Y. Tax L. §481(2)(a) & 4 and N.Y. Tax L. § 1814(a)(i), in that on or about November 1, 2012, in the County of Kings,

did willfully attempt in any manner to evade or defeat the taxes imposed pursuant to New York State Tax Law or payment thereof on ten thousand (10,000) or more cigarettes.

COUNT THIRTY-EIGHT

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Munther Mahmoud and Nabil Saad Badr, a.k.a. Abu Nabil, each aiding the other and acting in concert, of the crime of Possession or Transport for the Purpose of Sale, or Sale or Offering For Sale, of Thirty Thousand or More Cigarettes in Unstamped or Unlawfully Stamped Packages in violation of N.Y. Tax L. §481(2)(a) & 4 and N.Y. Tax L. § 1814(c)(2), in that on or about November 2, 2012, in the County of Kings, not being agents licensed by the Commissioner of the New York State Department of Taxation and Finance, did willfully possess or transport for the purpose of sale, thirty thousand (30,000) or more cigarettes subject to the tax imposed pursuant to New York State Law in any unstamped or unlawfully stamped packages, and/or willfully sold or offered for sale thirty thousand (30,000) or more cigarettes in any unstamped or unlawfully stamped packages.

COUNT THIRTY-NINE

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Munther Mahmoud and Nabil Saad Badr, a.k.a. Abu Nabil, each aiding the other and acting in concert, of the crime of Attempt to Evade or Defeat Cigarette and Tobacco Products Tax in violation of N.Y. Tax L. §481(2)(a) & 4 and N.Y. Tax L. § 1814(a)(i), in that on or about November 2, 2012, in the County of Kings,

did willfully attempt in any manner to evade or defeat the taxes imposed pursuant to New York State Tax Law or payment thereof on ten thousand (10,000) or more cigarettes.

COUNT FORTY

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Munther Mahmoud and Nabil Saad Badr, a.k.a. Abu Nabil, each aiding the other and acting in concert, of the crime of Possession or Transport for the Purpose of Sale, or Sale or Offering For Sale, of Thirty Thousand or More Cigarettes in Unstamped or Unlawfully Stamped Packages in violation of **N.Y. Tax L. §481(2)(a) & 4 and N.Y. Tax L. § 1814(c)(2)**, in that on or about November 3, 2012, in the County of Kings, not being agents licensed by the Commissioner of the New York State Department of Taxation and Finance, did willfully possess or transport for the purpose of sale, thirty thousand (30,000) or more cigarettes subject to the tax imposed pursuant to New York State Law in any unstamped or unlawfully stamped packages, and/or willfully sold or offered for sale thirty thousand (30,000) or more cigarettes in any unstamped or unlawfully stamped packages.

COUNT FORTY-ONE

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Munther Mahmoud and Nabil Saad Badr, a.k.a. Abu Nabil, each aiding the other and acting in concert, of the crime of Attempt to Evade or Defeat Cigarette and Tobacco Products Tax in violation of **N.Y. Tax L. §481(2)(a) & 4 and N.Y. Tax L. § 1814(a)(i)**, in that on or about November 3, 2012, in the County of Kings,

did willfully attempt in any manner to evade or defeat the taxes imposed pursuant to New York State Tax Law or payment thereof on ten thousand (10,000) or more cigarettes.

COUNT FORTY-TWO

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Munther Mahmoud and Nabil Saad Badr, a.k.a. Abu Nabil, each aiding the other and acting in concert, of the crime of **Money Laundering in the Third Degree** in violation of **Penal Law § 470.10(1)(b)(i)(A)**, in that on or about and between October 31 and November 3, 2012, in the County of Kings, knowing that the property involved in one or more financial transactions represented the proceeds of criminal conduct, the defendants conducted one or more such financial transactions which in fact involved the proceeds of specified criminal conduct, as that term is defined under Article 470 of the Penal Law, with intent to promote the carrying on of criminal conduct, and the total value involved in such financial transaction or transactions exceeded fifty thousand dollars.

COUNT FORTY-THREE

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Munther Mahmoud and Nabil Saad Badr, a.k.a. Abu Nabil, each aiding the other and acting in concert, of the crime of **Money Laundering in the Third Degree** in violation of **Penal Law § 470.10(2)(b)(i)**, in that on or about and between October 31 and November 3, 2012, in the County of Kings, knowing that one or more monetary instruments represented the proceeds of criminal conduct, the defendants

transported, transmitted, or transferred, or attempted to transport, transmit or transfer, on one or more occasions, monetary instruments which in fact represented the proceeds of specified criminal conduct, as that term is defined in Article 470 of the Penal Law, from a place in any county in this state to or through a place outside that county or to a place in any county in this state from or through a place outside that county, with intent to promote the carrying on of criminal conduct, and the total value of such monetary instrument or instruments exceeded fifty thousand dollars.

COUNT FORTY-FOUR

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Munther Mahmoud and Nabil Saad Badr, a.k.a. Abu Nabil, each aiding the other and acting in concert, of the crime of Attempt to Evade or Defeat Cigarette and Tobacco Products Tax in violation of N.Y. Tax L. §481(2)(a) & 4 and N.Y. Tax L. § 1814(a)(i), in that on or about and between November 7 and November 8, 2012, in the County of Kings, did willfully attempt in any manner to evade or defeat the taxes imposed pursuant to New York State Tax Law or payment thereof on ten thousand (10,000) or more cigarettes.

COUNT FORTY-FIVE

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Munther Mahmoud and Nabil Saad Badr, a.k.a. Abu Nabil, each aiding the other and acting in concert, of the crime of Possession or Transport for the Purpose of Sale, or Sale or Offering For Sale, of Thirty Thousand or More

Cigarettes in Unstamped or Unlawfully Stamped Packages in violation of **N.Y. Tax L. §481(2)(a) & 4** and **N.Y. Tax L. § 1814(c)(2)**, in that on or about and between November 7 and November 8, 2012, in the County of Kings, not being agents licensed by the Commissioner of the New York State Department of Taxation and Finance, did willfully possess or transport for the purpose of sale, thirty thousand (30,000) or more cigarettes subject to the tax imposed pursuant to New York State Law in any unstamped or unlawfully stamped packages, and/or willfully sold or offered for sale thirty thousand (30,000) or more cigarettes in any unstamped or unlawfully stamped packages.

COUNT FORTY-SIX

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Munther Mahmoud and Nabil Saad Badr, a.k.a. Abu Nabil, each aiding the other and acting in concert, of the crime of **Money Laundering in the Third Degree** in violation of **Penal Law § 470.10(2)(b)(i)**, in that on or about and between November 7 and November 8, 2012, in the County of Kings, knowing that one or more monetary instruments represented the proceeds of criminal conduct, the defendants transported, transmitted, or transferred, or attempted to transport, transmit or transfer, on one or more occasions, monetary instruments which in fact represented the proceeds of specified criminal conduct, as that term is defined in Article 470 of the Penal Law, from a place in any county in this state to or through a place outside that county or to a place in any county in this state from or through a place outside that county, with intent to promote the carrying on of criminal conduct, and the total value of such monetary instrument or instruments exceeded fifty thousand dollars.

COUNT FORTY-SEVEN

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Munther Mahmoud and Nabil Saad Badr, a.k.a. Abu Nabil, each aiding the other and acting in concert, of the crime of Money Laundering in the Third Degree in violation of Penal Law § 470.10(1)(b)(i)(A), in that on or about and between November 7 and November 8, 2012, in the County of Kings, knowing that the property involved in one or more financial transactions represented the proceeds of criminal conduct, the defendants conducted one or more such financial transactions which in fact involved the proceeds of specified criminal conduct, as that term is defined under Article 470 of the Penal Law, with intent to promote the carrying on of criminal conduct, and the total value involved in such financial transaction or transactions exceeded fifty thousand dollars.

COUNT FORTY-EIGHT

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Munther Mahmoud and Nabil Saad Badr, a.k.a. Abu Nabil, each aiding the other and acting in concert, of the crime of Attempt to Evade or Defeat Cigarette and Tobacco Products Tax in violation of N.Y. Tax L. §481(2)(a) & 4 and N.Y. Tax L. § 1814(a)(i), in that on or about November 15, 2012, in the County of Kings, did willfully attempt in any manner to evade or defeat the taxes imposed pursuant to New York State Tax Law or payment thereof on ten thousand (10,000) or more cigarettes.

COUNT FORTY-NINE

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Munther Mahmoud and Nabil Saad Badr, a.k.a. Abu Nabil, each aiding the other and acting in concert, of the crime of Possession or Transport for the Purpose of Sale, or Sale or Offering For Sale, of Thirty Thousand or More Cigarettes in Unstamped or Unlawfully Stamped Packages in violation of N.Y. Tax L. §481(2)(a) & 4 and N.Y. Tax L. § 1814(c)(2), in that on or about November 15, 2012, in the County of Kings, not being agents licensed by the Commissioner of the New York State Department of Taxation and Finance, did willfully possess or transport for the purpose of sale, thirty thousand (30,000) or more cigarettes subject to the tax imposed pursuant to New York State Law in any unstamped or unlawfully stamped packages, and/or willfully sold or offered for sale thirty thousand (30,000) or more cigarettes in any unstamped or unlawfully stamped packages.

COUNT FIFTY

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Munther Mahmoud and Nabil Saad Badr, a.k.a. Abu Nabil, each aiding the other and acting in concert, of the crime of Money Laundering in the Second Degree in violation of Penal Law § 470.15(2)(b)(i), in that on or about and between November 14 and November 15, 2012, in the County of Kings, knowing that one or more monetary instruments represented the proceeds of specified criminal conduct, the defendants transported, transmitted, or transferred, or attempted to transport, transmit or

transfer, on one or more occasions, monetary instruments which in fact represented the proceeds of specified criminal conduct, as that term is defined in Article 470 of the Penal Law, from a place in any county in this state to or through a place outside that county or to a place in any county in this state from or through a place outside that county, with intent to promote the carrying on of specified criminal conduct, and the total value of such monetary instrument or instruments exceeded one hundred thousand dollars.

COUNT FIFTY-ONE

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Munther Mahmoud and Nabil Saad Badr, a.k.a. Abu Nabil, each aiding the other and acting in concert, of the crime of Money Laundering in the Second Degree in violation of Penal Law § 470.15(1)(b)(i)(A), in that on or about and between November 14 and November 15, 2012, in the County of Kings, knowing that the property involved in one or more financial transactions represented the proceeds of specified criminal conduct, the defendants conducted one or more such financial transactions which in fact involved the proceeds of specified criminal conduct, as that term is defined under Article 470 of the Penal Law, with intent to promote the carrying on of specified criminal conduct, and the total value involved in such financial transaction or transactions exceeded one hundred thousand dollars.

COUNT FIFTY-TWO

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Munther Mahmoud and Nabil Saad Badr, a.k.a. Abu Nabil, each

aiding the other and acting in concert, of the crime of **Attempt to Evade or Defeat Cigarette and Tobacco Products Tax** in violation of **N.Y. Tax L. §481(2)(a) & 4** and **N.Y. Tax L. § 1814(a)(i)**, in that on or about January 19, 2013, in the County of Kings, did willfully attempt in any manner to evade or defeat the taxes imposed pursuant to New York State Tax Law or payment thereof on ten thousand (10,000) or more cigarettes.

COUNT FIFTY-THREE

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Munther Mahmoud and Nabil Saad Badr, a.k.a. Abu Nabil, each aiding the other and acting in concert, of the crime of Possession or Transport for the Purpose of Sale, or Sale or Offering For Sale, of Thirty Thousand or More Cigarettes in Unstamped or Unlawfully Stamped Packages in violation of **N.Y. Tax L. §481(2)(a) & 4** and **N.Y. Tax L. § 1814(c)(2)**, in that on or about January 19, 2013, in the County of Kings, not being agents licensed by the Commissioner of the New York State Department of Taxation and Finance, did willfully possess or transport for the purpose of sale, thirty thousand (30,000) or more cigarettes subject to the tax imposed pursuant to New York State Law in any unstamped or unlawfully stamped packages, and/or willfully sold or offered for sale thirty thousand (30,000) or more cigarettes in any unstamped or unlawfully stamped packages.

COUNT FIFTY-FOUR

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Munther Mahmoud and Nabil Saad Badr, a.k.a. Abu Nabil, each

aiding the other and acting in concert, of the crime of **Attempt to Evade or Defeat Cigarette and Tobacco Products Tax** in violation of **N.Y. Tax L. §481(2)(a) & 4** and **N.Y. Tax L. § 1814(a)(i)**, in that on or about January 20, 2013, in the County of Kings, did willfully attempt in any manner to evade or defeat the taxes imposed pursuant to New York State Tax Law or payment thereof on ten thousand (10,000) or more cigarettes.

COUNT FIFTY-FIVE

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Munther Mahmoud and Nabil Saad Badr, a.k.a. Abu Nabil, each aiding the other and acting in concert, of the crime of Possession or Transport for the Purpose of Sale, or Sale or Offering For Sale, of Thirty Thousand or More Cigarettes in Unstamped or Unlawfully Stamped Packages in violation of **N.Y. Tax L. §481(2)(a) & 4** and **N.Y. Tax L. § 1814(c)(2)**, in that on or about January 20, 2013, in the County of Kings, not being agents licensed by the Commissioner of the New York State Department of Taxation and Finance, did willfully possess or transport for the purpose of sale, thirty thousand (30,000) or more cigarettes subject to the tax imposed pursuant to New York State Law in any unstamped or unlawfully stamped packages, and/or willfully sold or offered for sale thirty thousand (30,000) or more cigarettes in any unstamped or unlawfully stamped packages.

COUNT FIFTY-SIX

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Munther Mahmoud and Nabil Saad Badr, a.k.a. Abu Nabil, each

aiding the other and acting in concert, of the crime of **Attempt to Evade or Defeat Cigarette and Tobacco Products Tax** in violation of **N.Y. Tax L. §481(2)(a) & 4** and **N.Y. Tax L. § 1814(a)(i)**, in that on or about January 21, 2013, in the County of Kings, did willfully attempt in any manner to evade or defeat the taxes imposed pursuant to New York State Tax Law or payment thereof on ten thousand (10,000) or more cigarettes.

COUNT FIFTY-SEVEN

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Munther Mahmoud and Nabil Saad Badr, a.k.a. Abu Nabil, each aiding the other and acting in concert, of the crime of Possession or Transport for the Purpose of Sale, or Sale or Offering For Sale, of Thirty Thousand or More Cigarettes in Unstamped or Unlawfully Stamped Packages in violation of **N.Y. Tax L. §481(2)(a) & 4** and **N.Y. Tax L. § 1814(c)(2)**, in that on or about January 21, 2013, in the County of Kings, not being agents licensed by the Commissioner of the New York State Department of Taxation and Finance, did willfully possess or transport for the purpose of sale, thirty thousand (30,000) or more cigarettes subject to the tax imposed pursuant to New York State Law in any unstamped or unlawfully stamped packages, and/or willfully sold or offered for sale thirty thousand (30,000) or more cigarettes in any unstamped or unlawfully stamped packages.

COUNT FIFTY-EIGHT

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Munther Mahmoud and Nabil Saad Badr, a.k.a. Abu Nabil, each

aiding the other and acting in concert, of the crime of **Money Laundering in the Second Degree** in violation of **Penal Law § 470.15(2)(b)(i)**, in that on or about and between January 19 and January 24, 2013, in the County of Kings, knowing that one or more monetary instruments represented the proceeds of criminal conduct, the defendants transported, transmitted, or transferred, or attempted to transport, transmit or transfer, on one or more occasions, monetary instruments which in fact represented the proceeds of specified criminal conduct, as that term is defined in Article 470 of the Penal Law, from a place in any county in this state to or through a place outside that county or to a place in any county in this state from or through a place outside that county, with intent to promote the carrying on of criminal conduct, and the total value of such monetary instrument or instruments exceeded one hundred thousand dollars.

COUNT FIFTY-NINE

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Munther Mahmoud and Nabil Saad Badr, a.k.a. Abu Nabil, each aiding the other and acting in concert, of the crime of **Money Laundering in the Second Degree** in violation of **Penal Law § 470.15(1)(b)(i)(A)**, in that on or about and between January 19 and January 24, 2013, in the County of Kings, knowing that the property involved in one or more financial transactions represented the proceeds of specified criminal conduct, the defendants conducted one or more such financial transactions which in fact involved the proceeds of specified criminal conduct, as that term is defined under Article 470 of the Penal Law, with intent to promote the carrying on of specified

criminal conduct, and the total value involved in such financial transaction or transactions exceeded one hundred thousand dollars.

COUNT SIXTY

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Munther Mahmoud and Nabil Saad Badr, a.k.a. Abu Nabil, each aiding the other and acting in concert, of the crime of Attempt to Evade or Defeat Cigarette and Tobacco Products Tax in violation of N.Y. Tax L. §481(2)(a) & 4 and N.Y. Tax L. § 1814(a)(i), in that on or about February 12, 2013, in the County of Kings, did willfully attempt in any manner to evade or defeat the taxes imposed pursuant to New York State Tax Law or payment thereof on ten thousand (10,000) or more cigarettes.

COUNT SIXTY-ONE

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Munther Mahmoud and Nabil Saad Badr, a.k.a. Abu Nabil, each aiding the other and acting in concert, of the crime of Possession or Transport for the Purpose of Sale, or Sale or Offering For Sale, of Thirty Thousand or More Cigarettes in Unstamped or Unlawfully Stamped Packages in violation of N.Y. Tax L. §481(2)(a) & 4 and N.Y. Tax L. § 1814(c)(2), in that on or about February 12, 2013, in the County of Kings, not being agents licensed by the Commissioner of the New York State Department of Taxation and Finance, did willfully possess or transport for the purpose of sale, thirty thousand (30,000) or more cigarettes subject to the tax imposed

pursuant to New York State Law in any unstamped or unlawfully stamped packages, and/or willfully sold or offered for sale thirty thousand (30,000) or more cigarettes in any unstamped or unlawfully stamped packages.

COUNT SIXTY-TWO

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Munther Mahmoud and Nabil Saad Badr, a.k.a. Abu Nabil, each aiding the other and acting in concert, of the crime of Attempt to Evade or Defeat Cigarette and Tobacco Products Tax in violation of N.Y. Tax L. §481(2)(a) & 4 and N.Y. Tax L. § 1814(a)(i), in that on or about February 13, 2013, in the County of Kings, did willfully attempt in any manner to evade or defeat the taxes imposed pursuant to New York State Tax Law or payment thereof on ten thousand (10,000) or more cigarettes.

COUNT SIXTY-THREE

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Munther Mahmoud and Nabil Saad Badr, a.k.a. Abu Nabil , each aiding the other and acting in concert, of the crime of Possession or Transport for the Purpose of Sale, or Sale or Offering For Sale, of Thirty Thousand or More Cigarettes in Unstamped or Unlawfully Stamped Packages in violation of N.Y. Tax L. §481(2)(a) & 4 and N.Y. Tax L. § 1814(c)(2), in that on or about February 13, 2013, in the County of Kings, not being agents licensed by the Commissioner of the New York State Department of Taxation and Finance, did willfully possess or transport for the purpose of sale, thirty thousand (30,000) or more cigarettes subject to the tax imposed

pursuant to New York State Law in any unstamped or unlawfully stamped packages, and/or willfully sold or offered for sale thirty thousand (30,000) or more cigarettes in any unstamped or unlawfully stamped packages.

COUNT SIXTY-FOUR

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Munther Mahmoud and Nabil Saad Badr, a.k.a. Abu Nabil, each aiding the other and acting in concert, of the crime of Attempt to Evade or Defeat Cigarette and Tobacco Products Tax in violation of N.Y. Tax L. §481(2)(a) & 4 and N.Y. Tax L. § 1814(a)(i), in that on or about February 14, 2013, in the County of Kings, did willfully attempt in any manner to evade or defeat the taxes imposed pursuant to New York State Tax Law or payment thereof on ten thousand (10,000) or more cigarettes.

COUNT SIXTY-FIVE

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Munther Mahmoud and Nabil Saad Badr, a.k.a. Abu Nabil, each aiding the other and acting in concert, of the crime of Possession or Transport for the Purpose of Sale, or Sale or Offering For Sale, of Thirty Thousand or More Cigarettes in Unstamped or Unlawfully Stamped Packages in violation of N.Y. Tax L. §481(2)(a) & 4 and N.Y. Tax L. § 1814(c)(2), in that on or about February 14, 2013, in the County of Kings, not being agents licensed by the Commissioner of the New York State Department of Taxation and Finance, did willfully possess or transport for the purpose of sale, thirty thousand (30,000) or more cigarettes subject to the tax imposed

pursuant to New York State Law in any unstamped or unlawfully stamped packages, and/or willfully sold or offered for sale thirty thousand (30,000) or more cigarettes in any unstamped or unlawfully stamped packages.

COUNT SIXTY-SIX

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Munther Mahmoud and Nabil Saad Badr, a.k.a. Abu Nabil, each aiding the other and acting in concert, of the crime of Attempt to Evade or Defeat Cigarette and Tobacco Products Tax in violation of N.Y. Tax L. §481(2)(a) & 4 and N.Y. Tax L. § 1814(a)(i), in that on or about February 15, 2013, in the County of Kings, did willfully attempt in any manner to evade or defeat the taxes imposed pursuant to New York State Tax Law or payment thereof on ten thousand (10,000) or more cigarettes.

COUNT SIXTY-SEVEN

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Munther Mahmoud and Nabil Saad Badr, a.k.a. Abu Nabil, each aiding the other and acting in concert, of the crime of Possession or Transport for the Purpose of Sale, or Sale or Offering For Sale, of Thirty Thousand or More Cigarettes in Unstamped or Unlawfully Stamped Packages in violation of N.Y. Tax L. §481(2)(a) & 4 and N.Y. Tax L. § 1814(c)(2), in that on or about February 15, 2013, in the County of Kings, not being agents licensed by the Commissioner of the New York State Department of Taxation and Finance, did willfully possess or transport for the purpose of sale, thirty thousand (30,000) or more cigarettes subject to the tax imposed

pursuant to New York State Law in any unstamped or unlawfully stamped packages, and/or willfully sold or offered for sale thirty thousand (30,000) or more cigarettes in any unstamped or unlawfully stamped packages.

COUNT SIXTY-EIGHT

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Munther Mahmoud and Nabil Saad Badr, a.k.a. Abu Nabil, each aiding the other and acting in concert, of the crime of Attempt to Evade or Defeat Cigarette and Tobacco Products Tax in violation of N.Y. Tax L. §481(2)(a) & 4 and N.Y. Tax L. § 1814(a)(i), in that on or about February 16, 2013, in the County of Kings, did willfully attempt in any manner to evade or defeat the taxes imposed pursuant to New York State Tax Law or payment thereof on ten thousand (10,000) or more cigarettes.

COUNT SIXTY-NINE

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Munther Mahmoud and Nabil Saad Badr, a.k.a. Abu Nabil , each aiding the other and acting in concert, of the crime of Possession or Transport for the Purpose of Sale, or Sale or Offering For Sale, of Thirty Thousand or More Cigarettes in Unstamped or Unlawfully Stamped Packages in violation of N.Y. Tax L. §481(2)(a) & 4 and N.Y. Tax L. § 1814(c)(2), in that on or about February 16, 2013, in the County of Kings, not being agents licensed by the Commissioner of the New York State Department of Taxation and Finance, did willfully possess or transport for the purpose of sale, thirty thousand (30,000) or more cigarettes subject to the tax imposed

pursuant to New York State Law in any unstamped or unlawfully stamped packages, and/or willfully sold or offered for sale thirty thousand (30,000) or more cigarettes in any unstamped or unlawfully stamped packages.

COUNT SEVENTY

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Munther Mahmoud and Nabil Saad Badr, a.k.a. Abu Nabil, each aiding the other and acting in concert, of the crime of **Money Laundering in the Second Degree** in violation of **Penal Law § 470.15(2)(b)(i)**, in that on or about and between February 12 and February 17, 2013, in the County of Kings, knowing that one or more monetary instruments represented the proceeds of specified criminal conduct, the defendants transported, transmitted, or transferred, or attempted to transport, transmit or transfer, on one or more occasions, monetary instruments which in fact represented the proceeds of specified criminal conduct, as that term is defined in Article 470 of the Penal Law, from a place in any county in this state to or through a place outside that county or to a place in any county in this state from or through a place outside that county, with intent to promote the carrying on of specified criminal conduct, and the total value of such monetary instrument or instruments exceeded one hundred thousand dollars.

COUNT SEVENTY-ONE

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Munther Mahmoud and Nabil Saad Badr, a.k.a. Abu Nabil, each aiding the other and acting in concert, of the crime of **Money Laundering in the Second**

Degree in violation of **Penal Law § 470.15(1)(b)(i)(A)**, in that on or about and between February 12 and February 17, 2013, in the County of Kings, knowing that the property involved in one or more financial transactions represented the proceeds of specified criminal conduct, the defendants conducted one or more such financial transactions which in fact involved the proceeds of specified criminal conduct, as that term is defined under Article 470 of the Penal Law, with intent to promote the carrying on of specified criminal conduct, and the total value involved in such financial transaction or transactions exceeded one hundred thousand dollars.

COUNT SEVENTY-TWO

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu Saleem, each aiding the other and acting in concert, of the crime of Attempt to Evade or Defeat Cigarette and Tobacco Products Tax in violation of **N.Y. Tax L. §481(2)(a) & 4 and N.Y. Tax L. § 1814(a)(i)**, in that on or about December 4, 2012, in the County of Kings, did willfully attempt in any manner to evade or defeat the taxes imposed pursuant to New York State Tax Law or payment thereof on ten thousand (10,000) or more cigarettes.

COUNT SEVENTY-THREE

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu Saleem, each aiding the other and acting in concert, of the crime of Possession or

Transport for the Purpose of Sale, or Sale or Offering For Sale, of Thirty Thousand or More Cigarettes in Unstamped or Unlawfully Stamped Packages in violation of **N.Y. Tax L. §481(2)(a) & 4 and N.Y. Tax L. § 1814(c)(2)**, in that on or about December 4, 2012, in the County of Kings, not being agents licensed by the Commissioner of the New York State Department of Taxation and Finance, did willfully possess or transport for the purpose of sale, thirty thousand (30,000) or more cigarettes subject to the tax imposed pursuant to New York State Law in any unstamped or unlawfully stamped packages, and/or willfully sold or offered for sale thirty thousand (30,000) or more cigarettes in any unstamped or unlawfully stamped packages.

COUNT SEVENTY-FOUR

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu Saleem, each aiding the other and acting in concert, of the crime of **Money Laundering in the Third Degree** in violation of **Penal Law § 470.10(2)(b)(i)**, in that on or about December 4, 2012, in the County of Kings, knowing that one or more monetary instruments represented the proceeds of criminal conduct, the defendants transported, transmitted, or transferred, or attempted to transport, transmit or transfer, on one or more occasions, monetary instruments which in fact represented the proceeds of specified criminal conduct, as that term is defined in Article 470 of the Penal Law, from a place in any county in this state to or through a place outside that county or to a place in any county in this state from or through a place outside that county, with intent to

promote the carrying on of criminal conduct, and the total value of such monetary instrument or instruments exceeded fifty thousand dollars.

COUNT SEVENTY-FIVE

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu Saleem, each aiding the other and acting in concert, of the crime of Money Laundering in the Third Degree in violation of **Penal Law § 470.10(1)(b)(i)(A)**, in that on or about December 4, 2012, in the County of Kings, knowing that the property involved in one or more financial transactions represented the proceeds of criminal conduct, the defendants conducted one or more such financial transactions which in fact involved the proceeds of specified criminal conduct, as that term is defined under Article 470 of the Penal Law, with intent to promote the carrying on of criminal conduct, and the total value involved in such financial transaction or transactions exceeded fifty thousand dollars.

COUNT SEVENTY-SIX

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu Saleem, each aiding the other and acting in concert, of the crime of Criminal Possession of a Forged Instrument in the First Degree in violation of **Penal Law § 170.30**, in that on or about December 4, 2012, with knowledge that it is forged and with

intent to defraud, deceive or injure another, the defendants uttered any forged instrument of a kind specified in Penal Law section 170.15.

COUNT SEVENTY-SEVEN

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Mufeed Attal, a.k.a. Abu Saleem, and Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali, each aiding the other and acting in concert, of the crime of Possession or Transport for the Purpose of Sale, or Sale or Offering For Sale, of Thirty Thousand or More Cigarettes in Unstamped or Unlawfully Stamped Packages in violation of N.Y. Tax L. §481(2)(a) & 4 and N.Y. Tax L. § 1814(c)(2), in that on or about November 4, 2012, in the County of Kings, not being agents licensed by the Commissioner of the New York State Department of Taxation and Finance, did willfully possess or transport for the purpose of sale, thirty thousand (30,000) or more cigarettes subject to the tax imposed pursuant to New York State Law in any unstamped or unlawfully stamped packages, and/or willfully sold or offered for sale thirty thousand (30,000) or more cigarettes in any unstamped or unlawfully stamped packages.

COUNT SEVENTY-EIGHT

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Mufeed Attal, a.k.a. Abu Saleem, and Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali, each aiding the other and acting in concert, of the crime of Attempt to Evade or Defeat Cigarette and Tobacco

Products Tax in violation of **N.Y. Tax L. §481(2)(a) & 4** and **N.Y. Tax L. § 1814(a)(i)**, in that on or about November 4, 2012, in the County of Kings, did willfully attempt in any manner to evade or defeat the taxes imposed pursuant to New York State Tax Law or payment thereof on ten thousand (10,000) or more cigarettes.

COUNT SEVENTY-NINE

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Mufeed Attal, a.k.a. Abu Saleem, and Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali, each aiding the other and acting in concert, of the crime of **Money Laundering in the Fourth Degree** in violation of **Penal Law § 470.05(2)(a)(i)**, in that on or about November 4, 2012, in the County of Kings knowing that one or more monetary instruments represented the proceeds of criminal conduct, the defendants transported, transmitted, or transferred, on one or more occasions, monetary instruments which in fact represented the proceeds of specified criminal conduct, as that term is defined in Article 470 of the Penal Law, with intent to promote the carrying on of criminal conduct, and the total value of such monetary instrument or instruments exceeded ten thousand dollars.

COUNT EIGHTY

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Mufeed Attal, a.k.a. Abu Saleem, and Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali, each aiding the other and acting in concert, of the crime of **Money Laundering in the Fourth Degree** in violation

of **Penal Law § 470.05(1)(a)(i)(A)**, in that on or about November 4, 2012, in the County of Kings, knowing that the property involved in one or more financial transactions represented the proceeds of criminal conduct, the defendants conducted one or more such financial transactions which in fact involved the proceeds of specified criminal conduct, as that term is defined under Article 470 of the Penal Law, with intent to promote the carrying on of criminal conduct, and the total value involved in such financial transaction or transactions exceeded five thousand dollars.

COUNT EIGHTY-ONE

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali, Mufeed Attal, a.k.a. Abu Saleem and Murad Bishrat, each aiding the other and acting in concert, of the crime of Possession or Transport for the Purpose of Sale, or Sale or Offering For Sale, of Thirty Thousand or More Cigarettes in Unstamped or Unlawfully Stamped Packages in violation of **N.Y. Tax L. §481(2)(a) & 4 and N.Y. Tax L. § 1814(c)(2)**, in that on or about November 30, 2012, in the County of Kings, not being agents licensed by the Commissioner of the New York State Department of Taxation and Finance, did willfully possess or transport for the purpose of sale, thirty thousand (30,000) or more cigarettes subject to the tax imposed pursuant to New York State Law in any unstamped or unlawfully stamped packages, and/or willfully sold or offered for sale thirty thousand (30,000) or more cigarettes in any unstamped or unlawfully stamped packages.

COUNT EIGHTY-TWO

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali, Mufeed Attal, a.k.a. Abu Saleem and Murad Bishrat, each aiding the other and acting in concert, of the crime of **Attempt to Evade or Defeat Cigarette and Tobacco Products Tax** in violation of **N.Y. Tax L. §481(2)(a) & 4** and **N.Y. Tax L. § 1814(a)(i)**, in that on or about November 30, 2012, in the County of Kings, did willfully attempt in any manner to evade or defeat the taxes imposed pursuant to New York State Tax Law or payment thereof on ten thousand (10,000) or more cigarettes.

COUNT EIGHTY-THREE

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali, Mufeed Attal, a.k.a. Abu Saleem and Murad Bishrat, each aiding the other and acting in concert, of the crime of **Money Laundering in the Fourth Degree** in violation of **Penal Law § 470.05(2)(a)(i)**, in that on or about November 30, 2012, in the County of Kings, knowing that one or more monetary instruments represented the proceeds of criminal conduct, the defendants transported, transmitted, or transferred, or attempted to transport, transmit or transfer, on one or more occasions, monetary instruments which in fact represented the proceeds of specified criminal conduct, as that term is defined in Article 470 of the Penal Law, with intent to promote the carrying on of criminal conduct, and the total value of such monetary instrument or instruments exceeded ten thousand dollars.

COUNT EIGHTY-FOUR

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali, Mufeed Attal, a.k.a. Abu Saleem and Murad Bishrat, each aiding the other and acting in concert, of the crime of Money Laundering in the Fourth Degree in violation of Penal Law § 470.05(1)(a)(i)(A), in that on or about November 30, 2012, in the County of Kings, knowing that the property involved in one or more financial transactions represented the proceeds of criminal conduct, the defendants conducted one or more such financial transactions which in fact involved the proceeds of specified criminal conduct, as that term is defined under Article 470 of the Penal Law, with intent to promote the carrying on of criminal conduct, and the total value involved in such financial transaction or transactions exceeded five thousand dollars.

COUNT EIGHTY-FIVE

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali, Mufeed Attal, a.k.a. Abu Saleem and Murad Bishrat, each aiding the other and acting in concert, of the crime of Attempt to Evade or Defeat Cigarette and Tobacco Products Tax in violation of N.Y. Tax L. §481(2)(a) & 4 and N.Y. Tax L. § 1814(a)(i), in that on or about and between December 26 and December 27, 2012, in the County of Kings, did willfully attempt in any manner to evade or defeat the taxes imposed pursuant to New York State Tax Law or payment thereof on ten thousand (10,000) or more cigarettes.

COUNT EIGHTY-SIX

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali, Mufeed Attal, a.k.a. Abu Saleem and Murad Bishrat, each aiding the other and acting in concert, of the crime of Possession or Transport for the Purpose of Sale, or Sale or Offering For Sale, of Thirty Thousand or More Cigarettes in Unstamped or Unlawfully Stamped Packages in violation of N.Y. Tax L. §481(2)(a) & 4 and N.Y. Tax L. § 1814(c)(2), in that on or about and between December 26 and December 27, 2012, in the County of Kings, not being agents licensed by the Commissioner of the New York State Department of Taxation and Finance, did willfully possess or transport for the purpose of sale, thirty thousand (30,000) or more cigarettes subject to the tax imposed pursuant to New York State Law in any unstamped or unlawfully stamped packages, and/or willfully sold or offered for sale thirty thousand (30,000) or more cigarettes in any unstamped or unlawfully stamped packages.

COUNT EIGHTY-SEVEN

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali, Mufeed Attal, a.k.a. Abu Saleem and Murad Bishrat, each aiding the other and acting in concert, of the crime of Money Laundering in the Third Degree in violation of Penal Law § 470.10(2)(b)(i), in that on or about and between December 26 and December 27, 2012, in the County of Kings, knowing that one or more

monetary instruments represented the proceeds of criminal conduct, the defendants transported, transmitted, or transferred, or attempted to transport, transmit or transfer, on one or more occasions, monetary instruments which in fact represented the proceeds of specified criminal conduct, as that term is defined in Article 470 of the Penal Law, from a place in any county in this state to or through a place outside that county or to a place in any county in this state from or through a place outside that county, with intent to promote the carrying on of criminal conduct, and the total value of such monetary instrument or instruments exceeded fifty thousand dollars.

COUNT EIGHTY-EIGHT

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali, Mufeed Attal, a.k.a. Abu Saleem and Murad Bishrat, each aiding the other and acting in concert, of the crime of Money Laundering in the Third Degree in violation of Penal Law § 470.10(1)(b)(i)(A), in that on or about and between December 26 and December 27, 2012, in the County of Kings, knowing that the property involved in one or more financial transactions represented the proceeds of criminal conduct, the defendants conducted one or more such financial transactions which in fact involved the proceeds of specified criminal conduct, as that term is defined under Article 470 of the Penal Law, with intent to promote the carrying on of criminal conduct, and the total value involved in such financial transaction or transactions exceeded fifty thousand dollars.

COUNT EIGHTY-NINE

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu Saleem, each aiding the other and acting in concert, of the crime of Attempt to Evade or Defeat Cigarette and Tobacco Products Tax in violation of N.Y. Tax L. §481(2)(a) & 4 and N.Y. Tax L. § 1814(a)(i), in that on or about February 3, 2013, in the County of Kings, did willfully attempt in any manner to evade or defeat the taxes imposed pursuant to New York State Tax Law or payment thereof on ten thousand (10,000) or more cigarettes.

COUNT NINETY

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu Saleem, each aiding the other and acting in concert, of the crime of Possession or Transport for the Purpose of Sale, or Sale or Offering For Sale, of Thirty Thousand or More Cigarettes in Unstamped or Unlawfully Stamped Packages in violation of N.Y. Tax L. §481(2)(a) & 4 and N.Y. Tax L. § 1814(c)(2), in that on or about February 3, 2013, in the County of Kings, not being agents licensed by the Commissioner of the New York State Department of Taxation and Finance, did willfully possess or transport for the purpose of sale, thirty thousand (30,000) or more cigarettes subject to the tax imposed pursuant to New York State Law in any unstamped or unlawfully stamped packages, and/or willfully sold or offered for sale thirty thousand (30,000) or more cigarettes in any unstamped or unlawfully stamped packages.

COUNT NINETY-ONE

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu Saleem, each aiding the other and acting in concert, of the crime of **Money Laundering in the Fourth Degree** in violation of **Penal Law § 470.05(2)(a)(i)**, in that on or about February 3, 2013, in the County of Kings, knowing that one or more monetary instruments represented the proceeds of criminal conduct, the defendants transported, transmitted, or transferred, on one or more occasions, monetary instruments which in fact represented the proceeds of specified criminal conduct, as that term is defined in Article 470 of the Penal Law, with intent to promote the carrying on of criminal conduct, and the total value of such monetary instrument or instruments exceeded ten thousand dollars.

COUNT NINETY-TWO

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu Saleem, each aiding the other and acting in concert, of the crime of **Money Laundering in the Fourth Degree** in violation of **Penal Law § 470.05(1)(a)(i)(A)**, in that on or about February 3, 2013, in the County of Kings, knowing that the property involved in one or more financial transactions represented the proceeds of criminal conduct, the defendants conducted one or more such financial transactions which in fact involved the proceeds of specified criminal conduct, as that term is defined under Article 470 of the Penal Law, with intent to promote the

carrying on of criminal conduct, and the total value involved in such financial transaction or transactions exceeded five thousand dollars.

COUNT NINETY-THREE

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu Saleem, each aiding the other and acting in concert, of the crime of Attempt to Evade or Defeat Cigarette and Tobacco Products Tax in violation of **N.Y. Tax L. §481(2)(a) & 4 and N.Y. Tax L. § 1814(a)(i)**, in that on or about February 5, 2013, in the County of Kings, did willfully attempt in any manner to evade or defeat the taxes imposed pursuant to New York State Tax Law or payment thereof on ten thousand (10,000) or more cigarettes.

COUNT NINETY-FOUR

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu Saleem, each aiding the other and acting in concert, of the crime of Possession or Transport for the Purpose of Sale, or Sale or Offering For Sale, of Thirty Thousand or More Cigarettes in Unstamped or Unlawfully Stamped Packages in violation of **N.Y. Tax L. §481(2)(a) & 4 and N.Y. Tax L. § 1814(c)(2)**, in that on or about February 5, 2013, in the County of Kings, not being agents licensed by the Commissioner of the New York State Department of Taxation and Finance, did willfully possess or transport

for the purpose of sale, thirty thousand (30,000) or more cigarettes subject to the tax imposed pursuant to New York State Law in any unstamped or unlawfully stamped packages, and/or willfully sold or offered for sale thirty thousand (30,000) or more cigarettes in any unstamped or unlawfully stamped packages.

COUNT NINETY-FIVE

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu Saleem, each aiding the other and acting in concert, of the crime of Money Laundering in the Fourth Degree in violation of Penal Law § 470.05(2)(a)(i), in that on or about February 5, 2013, in the County of Kings, knowing that one or more monetary instruments represented the proceeds of criminal conduct, the defendants transported, transmitted, or transferred, on one or more occasions, monetary instruments which in fact represented the proceeds of specified criminal conduct, as that term is defined in Article 470 of the Penal Law, with intent to promote the carrying on of criminal conduct, and the total value of such monetary instrument or instruments exceeded ten thousand dollars.

COUNT NINETY-SIX

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu Saleem, each aiding the other and acting in concert, of the crime of Money Laundering in the Fourth Degree in violation of Penal Law § 470.05(1)(a)(i)(A), in

that on or about February 5, 2013, in the County of Kings, knowing that the property involved in one or more financial transactions represented the proceeds of criminal conduct, the defendants conducted one or more such financial transactions which in fact involved the proceeds of specified criminal conduct, as that term is defined under Article 470 of the Penal Law, with intent to promote the carrying on of criminal conduct, and the total value involved in such financial transaction or transactions exceeded five thousand dollars.

COUNT NINETY-SEVEN

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu Saleem, each aiding the other and acting in concert, of the crime of Attempt to Evade or Defeat Cigarette and Tobacco Products Tax in violation of N.Y. Tax L. §481(2)(a) & 4 and N.Y. Tax L. § 1814(a)(i), in that on or about February 10, 2013, in the County of Kings, did willfully attempt in any manner to evade or defeat the taxes imposed pursuant to New York State Tax Law or payment thereof on ten thousand (10,000) or more cigarettes.

COUNT NINETY-EIGHT

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu Saleem, each aiding the other and acting in concert, of the crime of Possession or Transport for the Purpose of Sale, or Sale or Offering For Sale, of Thirty Thousand

or More Cigarettes in Unstamped or Unlawfully Stamped Packages in violation of **N.Y. Tax L. §481(2)(a) & 4** and **N.Y. Tax L. § 1814(c)(2)**, in that on or about February 10, 2013, in the County of Kings, not being agents licensed by the Commissioner of the New York State Department of Taxation and Finance, did willfully possess or transport for the purpose of sale, thirty thousand (30,000) or more cigarettes subject to the tax imposed pursuant to New York State Law in any unstamped or unlawfully stamped packages, and/or willfully sold or offered for sale thirty thousand (30,000) or more cigarettes in any unstamped or unlawfully stamped packages.

COUNT NINETY-NINE

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu Saleem, each aiding the other and acting in concert, of the crime of **Money Laundering in the Fourth Degree** in violation of **Penal Law § 470.05(2)(a)(i)**, in that on or about February 10, 2013, in the County of Kings, knowing that one or more monetary instruments represented the proceeds of criminal conduct, the defendants transported, transmitted, or transferred, on one or more occasions, monetary instruments which in fact represented the proceeds of specified criminal conduct, as that term is defined in Article 470 of the Penal Law, with intent to promote the carrying on of criminal conduct, and the total value of such monetary instrument or instruments exceeded ten thousand dollars.

COUNT ONE HUNDRED

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu Saleem, each aiding the other and acting in concert, of the crime of Money Laundering in the Fourth Degree in violation of Penal Law § 470.05(1)(a)(i)(A), in that on or about February 10, 2013, in the County of Kings, knowing that the property involved in one or more financial transactions represented the proceeds of criminal conduct, the defendants conducted one or more such financial transactions which in fact involved the proceeds of specified criminal conduct, as that term is defined under Article 470 of the Penal Law, with intent to promote the carrying on of criminal conduct, and the total value involved in such financial transaction or transactions exceeded five thousand dollars.

COUNT ONE HUNDRED-ONE

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Issa Sulieman, Ahmad Abdelaziz, a.k.a. Al Jaba'I, Ribhi Awawdeh and Mohamed Abed Alabed Awawdeh, a.k.a. Abu Samir, each aiding the other and acting in concert, of the crime of Attempt to Evade or Defeat Cigarette and Tobacco Products Tax in violation of N.Y. Tax L. §481(2)(a) & 4 and N.Y. Tax L. § 1814(a)(i), in that on or about February 11, 2013, in the County of Kings, did willfully

attempt in any manner to evade or defeat the taxes imposed pursuant to New York State Tax Law or payment thereof on ten thousand (10,000) or more cigarettes.

COUNT ONE HUNDRED-TWO

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Issa Sulieman, Ahmad Abdelaziz, a.k.a. Al Jaba'I, Ribhi Awawdeh and Mohamed Abed Alabed Awawdeh, a.k.a. Abu Samir, each aiding the other and acting in concert, of the crime of Possession or Transport for the Purpose of Sale, or Sale or Offering For Sale, of Thirty Thousand or More Cigarettes in Unstamped or Unlawfully Stamped Packages in violation of N.Y. Tax L. §481(2)(a) & 4 and N.Y. Tax L. § 1814(c)(2), in that on or about February 11, 2013, in the County of Kings, not being agents licensed by the Commissioner of the New York State Department of Taxation and Finance, did willfully possess or transport for the purpose of sale, thirty thousand (30,000) or more cigarettes subject to the tax imposed pursuant to New York State Law in any unstamped or unlawfully stamped packages, and/or willfully sold or offered for sale thirty thousand (30,000) or more cigarettes in any unstamped or unlawfully stamped packages.

COUNT ONE HUNDRED-THREE

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Issa Sulieman, Ahmad Abdelaziz, a.k.a. Al Jaba'I, Ribhi Awawdeh and

Mohamed Abed Alabed Awawdeh, a.k.a. Abu Samir, each aiding the other and acting in concert, of the crime of **Money Laundering in the Second Degree** in violation of **Penal Law § 470.15(2)(b)(i)**, in that on or about February 11, 2013, in the County of Kings, knowing that one or more monetary instruments represented the proceeds of specified criminal conduct, the defendants transported, transmitted, or transferred, or attempted to transport, transmit or transfer, on one or more occasions, monetary instruments which in fact represented the proceeds of specified criminal conduct, as that term is defined in Article 470 of the Penal Law, from a place in any county in this state to or through a place outside that county or to a place in any county in this state from or through a place outside that county, with intent to promote the carrying on of specified criminal conduct, and the total value of such monetary instrument or instruments exceeded one hundred thousand dollars.

COUNT ONE HUNDRED-FOUR

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Issa Sulieman, Ahmad Abdelaziz, a.k.a. Al Jaba'I, Ribhi Awawdeh and Mohamed Abed Alabed Awawdeh, a.k.a. Abu Samir, each aiding the other and acting in concert, of the crime of **Money Laundering in the Second Degree** in violation of **Penal Law § 470.15(1)(b)(i)(A)**, in that on or about February 11, 2013, in the County of Kings, knowing that the property involved in one or more financial transactions represented the proceeds of specified criminal conduct, the defendants conducted one or more such financial transactions which in fact involved the proceeds of specified criminal

conduct, as that term is defined under Article 470 of the Penal Law, with intent to promote the carrying on of specified criminal conduct, and the total value involved in such financial transaction or transactions exceeded one hundred thousand dollars.

COUNT ONE HUNDRED-FIVE

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu Saleem, each aiding the other and acting in concert, of the crime of **Attempt to Evade or Defeat Cigarette and Tobacco Products Tax** in violation of **N.Y. Tax L. §481(2)(a) & 4 and N.Y. Tax L. § 1814(a)(i)**, in that on or about February 16, 2013, in the County of Kings, did willfully attempt in any manner to evade or defeat the taxes imposed pursuant to New York State Tax Law or payment thereof on ten thousand (10,000) or more cigarettes.

COUNT ONE HUNDRED-SIX

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu Saleem, each aiding the other and acting in concert, of the crime of **Possession or Transport for the Purpose of Sale, or Sale or Offering For Sale, of Thirty Thousand or More Cigarettes in Unstamped or Unlawfully Stamped Packages** in violation of **N.Y. Tax L. §481(2)(a) & 4 and N.Y. Tax L. § 1814(c)(2)**, in that on or about February 16, 2013, in the County of Kings, not being agents licensed by the Commissioner of the New York State Department of Taxation and Finance, did willfully possess or transport

for the purpose of sale, thirty thousand (30,000) or more cigarettes subject to the tax imposed pursuant to New York State Law in any unstamped or unlawfully stamped packages, and/or willfully sold or offered for sale thirty thousand (30,000) or more cigarettes in any unstamped or unlawfully stamped packages.

COUNT ONE HUNDRED-SEVEN

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu Saleem, each aiding the other and acting in concert, of the crime of **Money Laundering in the Third Degree** in violation of **Penal Law § 470.10(2)(b)(i)**, in that on or about February 16, 2013, in the County of Kings, knowing that one or more monetary instruments represented the proceeds of criminal conduct, the defendants transported, transmitted, or transferred, or attempted to transport, transmit or transfer, on one or more occasions, monetary instruments which in fact represented the proceeds of specified criminal conduct, as that term is defined in Article 470 of the Penal Law, from a place in any county in this state to or through a place outside that county or to a place in any county in this state from or through a place outside that county, with intent to promote the carrying on of criminal conduct, and the total value of such monetary instrument or instruments exceeded fifty thousand dollars.

COUNT ONE HUNDRED-EIGHT

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a.

Abu Saleem, each aiding the other and acting in concert, of the crime of **Money Laundering in the Third Degree** in violation of **Penal Law § 470.10(1)(b)(i)(A)**, in that on or about February 16, 2013, in the County of Kings, knowing that the property involved in one or more financial transactions represented the proceeds of criminal conduct, the defendants conducted one or more such financial transactions which in fact involved the proceeds of specified criminal conduct, as that term is defined under Article 470 of the Penal Law, with intent to promote the carrying on of criminal conduct, and the total value involved in such financial transaction or transactions exceeded fifty thousand dollars.

COUNT ONE HUNDRED-NINE

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants **Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu Saleem**, each aiding the other and acting in concert, of the crime of **Attempt to Evade or Defeat Cigarette and Tobacco Products Tax** in violation of **N.Y. Tax L. §481(2)(a) & 4 and N.Y. Tax L. § 1814(a)(i)**, in that on or about February 17, 2013, in the County of Kings, did willfully attempt in any manner to evade or defeat the taxes imposed pursuant to New York State Tax Law or payment thereof on ten thousand (10,000) or more cigarettes.

COUNT ONE HUNDRED-TEN

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants **Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a.**

Abu Saleem, each aiding the other and acting in concert, of the crime of **Possession or Transport for the Purpose of Sale, or Sale or Offering For Sale, of Thirty Thousand or More Cigarettes in Unstamped or Unlawfully Stamped Packages** in violation of **N.Y. Tax L. §481(2)(a) & 4 and N.Y. Tax L. § 1814(c)(2)**, in that on or about February 17, 2013, in the County of Kings, not being agents licensed by the Commissioner of the New York State Department of Taxation and Finance, did willfully possess or transport for the purpose of sale, thirty thousand (30,000) or more cigarettes subject to the tax imposed pursuant to New York State Law in any unstamped or unlawfully stamped packages, and/or willfully sold or offered for sale thirty thousand (30,000) or more cigarettes in any unstamped or unlawfully stamped packages.

COUNT ONE HUNDRED-ELEVEN

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu Saleem, each aiding the other and acting in concert, of the crime of **Money Laundering in the Third Degree** in violation of **Penal Law § 470.10(2)(b)(i)**, in that on or about February 17, 2013, in the County of Kings, knowing that one or more monetary instruments represented the proceeds of criminal conduct, the defendants transported, transmitted, or transferred, or attempted to transport, transmit or transfer, on one or more occasions, monetary instruments which in fact represented the proceeds of specified criminal conduct, as that term is defined in Article 470 of the Penal Law, from a place in any county in this state to or through a place outside that county or to a place in any county in this state from or through a place outside that county, with intent to promote

the carrying on of criminal conduct, and the total value of such monetary instrument or instruments exceeded fifty thousand dollars.

COUNT ONE HUNDRED-TWELVE

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu Saleem, each aiding the other and acting in concert, of the crime of Money Laundering in the Third Degree in violation of **Penal Law § 470.10(1)(b)(i)(A)**, in that on or about February 17, 2013, in the County of Kings, knowing that the property involved in one or more financial transactions represented the proceeds of criminal conduct, the defendants conducted one or more such financial transactions which in fact involved the proceeds of specified criminal conduct, as that term is defined under Article 470 of the Penal Law, with intent to promote the carrying on of criminal conduct, and the total value involved in such financial transaction or transactions exceeded fifty thousand dollars.

COUNT ONE HUNDRED-THIRTEEN

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu Saleem, each aiding the other and acting in concert, of the crime of Attempt to Evade or Defeat Cigarette and Tobacco Products Tax in violation of **N.Y. Tax L. §481(2)(a) & 4 and N.Y. Tax L. § 1814(a)(i)**, in that on or about February 19, 2013, in

the County of Kings, did willfully attempt in any manner to evade or defeat the taxes imposed pursuant to New York State Tax Law or payment thereof on ten thousand (10,000) or more cigarettes.

COUNT ONE HUNDRED-FOURTEEN

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu Saleem, each aiding the other and acting in concert, of the crime of **Possession or Transport for the Purpose of Sale, or Sale or Offering For Sale, of Thirty Thousand or More Cigarettes in Unstamped or Unlawfully Stamped Packages** in violation of **N.Y. Tax L. §481(2)(a) & 4 and N.Y. Tax L. § 1814(c)(2)**, in that on or about February 19, 2013, in the County of Kings, not being agents licensed by the Commissioner of the New York State Department of Taxation and Finance, did willfully possess or transport for the purpose of sale, thirty thousand (30,000) or more cigarettes subject to the tax imposed pursuant to New York State Law in any unstamped or unlawfully stamped packages, and/or willfully sold or offered for sale thirty thousand (30,000) or more cigarettes in any unstamped or unlawfully stamped packages.

COUNT ONE HUNDRED-FIFTEEN

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu Saleem, each aiding the other and acting in concert, of the crime of **Money Laundering in the Third Degree** in violation of **Penal Law § 470.10(2)(b)(i)**, in that on

or about February 19, 2013, in the County of Kings, knowing that one or more monetary instruments represented the proceeds of criminal conduct, the defendants transported, transmitted, or transferred, or attempted to transport, transmit or transfer, on one or more occasions, monetary instruments which in fact represented the proceeds of specified criminal conduct, as that term is defined in Article 470 of the Penal Law, from a place in any county in this state to or through a place outside that county or to a place in any county in this state from or through a place outside that county, with intent to promote the carrying on of criminal conduct, and the total value of such monetary instrument or instruments exceeded fifty thousand dollars.

COUNT ONE HUNDRED-SIXTEEN

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu Saleem, each aiding the other and acting in concert, of the crime of Money Laundering in the Third Degree in violation of Penal Law § 470.10(1)(b)(i)(A), in that on or about February 19, 2013, in the County of Kings, knowing that the property involved in one or more financial transactions represented the proceeds of criminal conduct, the defendants conducted one or more such financial transactions which in fact involved the proceeds of specified criminal conduct, as that term is defined under Article 470 of the Penal Law, with intent to promote the carrying on of criminal conduct, and the total value involved in such financial transaction or transactions exceeded fifty thousand dollars.

COUNT ONE HUNDRED-SEVENTEEN

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu Saleem, each aiding the other and acting in concert, of the crime of Attempt to Evade or Defeat Cigarette and Tobacco Products Tax in violation of N.Y. Tax L. §481(2)(a) & 4 and N.Y. Tax L. § 1814(a)(i), in that on or about February 22, 2013, in the County of Kings, did willfully attempt in any manner to evade or defeat the taxes imposed pursuant to New York State Tax Law or payment thereof on ten thousand (10,000) or more cigarettes.

COUNT ONE HUNDRED-EIGHTEEN

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu Saleem, each aiding the other and acting in concert, of the crime of Possession or Transport for the Purpose of Sale, or Sale or Offering For Sale, of Thirty Thousand or More Cigarettes in Unstamped or Unlawfully Stamped Packages in violation of N.Y. Tax L. §481(2)(a) & 4 and N.Y. Tax L. § 1814(c)(2), in that on or about February 22, 2013, in the County of Kings, not being agents licensed by the Commissioner of the New York State Department of Taxation and Finance, did willfully possess or transport for the purpose of sale, thirty thousand (30,000) or more cigarettes subject to the tax imposed pursuant to New York State Law in any unstamped or unlawfully stamped

packages, and/or willfully sold or offered for sale thirty thousand (30,000) or more cigarettes in any unstamped or unlawfully stamped packages.

COUNT ONE HUNDRED-NINETEEN

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu Saleem, each aiding the other and acting in concert, of the crime of Money Laundering in the Third Degree in violation of **Penal Law § 470.10(2)(b)(i)**, in that on or about February 22, 2013, in the County of Kings, knowing that one or more monetary instruments represented the proceeds of criminal conduct, the defendants transported, transmitted, or transferred, or attempted to transport, transmit or transfer, on one or more occasions, monetary instruments which in fact represented the proceeds of specified criminal conduct, as that term is defined in Article 470 of the Penal Law, from a place in any county in this state to or through a place outside that county or to a place in any county in this state from or through a place outside that county, with intent to promote the carrying on of criminal conduct, and the total value of such monetary instrument or instruments exceeded fifty thousand dollars.

COUNT ONE HUNDRED TWENTY

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu Saleem, each aiding the other and acting in concert, of the crime of Money Laundering in the Third Degree in violation of **Penal Law § 470.10(1)(b)(i)(A)**, in that

on or about February 22, 2013, in the County of Kings, knowing that the property involved in one or more financial transactions represented the proceeds of criminal conduct, the defendants conducted one or more such financial transactions which in fact involved the proceeds of specified criminal conduct, as that term is defined under Article 470 of the Penal Law, with intent to promote the carrying on of criminal conduct, and the total value involved in such financial transaction or transactions exceeded fifty thousand dollars.

COUNT ONE HUNDRED TWENTY-ONE

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu Saleem, each aiding the other and acting in concert, of the crime of Attempt to Evade or Defeat Cigarette and Tobacco Products Tax in violation of N.Y. Tax L. §481(2)(a) & 4 and N.Y. Tax L. § 1814(a)(i), in that on or about February 23, 2013, in the County of Kings, did willfully attempt in any manner to evade or defeat the taxes imposed pursuant to New York State Tax Law or payment thereof on ten thousand (10,000) or more cigarettes.

COUNT ONE HUNDRED TWENTY-TWO

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu Saleem, each aiding the other and acting in concert, of the crime of Possession or Transport for the Purpose of Sale, or Sale or Offering For Sale, of Thirty Thousand

or More Cigarettes in Unstamped or Unlawfully Stamped Packages in violation of **N.Y. Tax L. §481(2)(a) & 4 and N.Y. Tax L. § 1814(c)(2)**, in that on or about February 23, 2013, in the County of Kings, not being agents licensed by the Commissioner of the New York State Department of Taxation and Finance, did willfully possess or transport for the purpose of sale, thirty thousand (30,000) or more cigarettes subject to the tax imposed pursuant to New York State Law in any unstamped or unlawfully stamped packages, and/or willfully sold or offered for sale thirty thousand (30,000) or more cigarettes in any unstamped or unlawfully stamped packages.

COUNT ONE HUNDRED TWENTY-THREE

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu Saleem, each aiding the other and acting in concert, of the crime of Money Laundering in the Third Degree in violation of **Penal Law § 470.10(2)(b)(i)**, in that on or about February 23, 2013, in the County of Kings, knowing that one or more monetary instruments represented the proceeds of criminal conduct, the defendants transported, transmitted, or transferred, or attempted to transport, transmit or transfer, on one or more occasions, monetary instruments which in fact represented the proceeds of specified criminal conduct, as that term is defined in Article 470 of the Penal Law, from a place in any county in this state to or through a place outside that county or to a place in any county in this state from or through a place outside that county, with intent to promote

the carrying on of criminal conduct, and the total value of such monetary instrument or instruments exceeded fifty thousand dollars.

COUNT ONE HUNDRED TWENTY-FOUR

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu Saleem, each aiding the other and acting in concert, of the crime of Money Laundering in the Third Degree in violation of Penal Law § 470.10(1)(b)(i)(A), in that on or about February 23, 2013, in the County of Kings, knowing that the property involved in one or more financial transactions represented the proceeds of criminal conduct, the defendants conducted one or more such financial transactions which in fact involved the proceeds of specified criminal conduct, as that term is defined under Article 470 of the Penal Law, with intent to promote the carrying on of criminal conduct, and the total value involved in such financial transaction or transactions exceeded fifty thousand dollars.

COUNT ONE HUNDRED TWENTY-FIVE

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu Saleem, each aiding the other and acting in concert, of the crime of Attempt to Evade or Defeat Cigarette and Tobacco Products Tax in violation of N.Y. Tax L. §481(2)(a) & 4 and N.Y. Tax L. § 1814(a)(i), in that on or about February 24, 2013, in the County of Kings, did willfully

attempt in any manner to evade or defeat the taxes imposed pursuant to New York State Tax Law or payment thereof on ten thousand (10,000) or more cigarettes.

COUNT ONE HUNDRED TWENTY-SIX

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu Saleem, each aiding the other and acting in concert, of the crime of Possession or Transport for the Purpose of Sale, or Sale or Offering For Sale, of Thirty Thousand or More Cigarettes in Unstamped or Unlawfully Stamped Packages in violation of N.Y. Tax L. §481(2)(a) & 4 and N.Y. Tax L. § 1814(c)(2), in that on or about February 24, 2013, in the County of Kings, not being agents licensed by the Commissioner of the New York State Department of Taxation and Finance, did willfully possess or transport for the purpose of sale, thirty thousand (30,000) or more cigarettes subject to the tax imposed pursuant to New York State Law in any unstamped or unlawfully stamped packages, and/or willfully sold or offered for sale thirty thousand (30,000) or more cigarettes in any unstamped or unlawfully stamped packages.

COUNT ONE HUNDRED TWENTY-SEVEN

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu Saleem, each aiding the other and acting in concert, of the crime of Money Laundering in the Fourth Degree in violation of Penal Law § 470.05(2)(a)(i), in that on or about February 24, 2013, in the County of Kings, knowing that one or more monetary instruments represented the proceeds of

criminal conduct, the defendants transported, transmitted, or transferred, on one or more occasions, monetary instruments which in fact represented the proceeds of specified criminal conduct, as that term is defined in Article 470 of the Penal Law, with intent to promote the carrying on of criminal conduct, and the total value of such monetary instrument or instruments exceeded ten thousand dollars.

COUNT ONE HUNDRED TWENTY-EIGHT

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu Saleem, each aiding the other and acting in concert, of the crime of Money Laundering in the Fourth Degree in violation of Penal Law § 470.05(1)(a)(i)(A), in that on or about February 24, 2013, in the County of Kings, knowing that the property involved in one or more financial transactions represented the proceeds of criminal conduct, the defendants conducted one or more such financial transactions which in fact involved the proceeds of specified criminal conduct, as that term is defined under Article 470 of the Penal Law, with intent to promote the carrying on of criminal conduct, and the total value involved in such financial transaction or transactions exceeded five thousand dollars.

COUNT ONE HUNDRED TWENTY-NINE

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu Saleem, each aiding the other and acting in concert, of the crime of Attempt to Evade or Defeat Cigarette and Tobacco Products Tax in violation of N.Y. Tax L.

§481(2)(a) & 4 and N.Y. Tax L. § 1814(a)(i), in that on or about February 28, 2013, in the County of Kings, did willfully attempt in any manner to evade or defeat the taxes imposed pursuant to New York State Tax Law or payment thereof on ten thousand (10,000) or more cigarettes.

COUNT ONE HUNDRED THIRTY

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu Saleem, each aiding the other and acting in concert, of the crime of **Possession or Transport for the Purpose of Sale, or Sale or Offering For Sale, of Thirty Thousand or More Cigarettes in Unstamped or Unlawfully Stamped Packages** in violation of **N.Y. Tax L. §481(2)(a) & 4 and N.Y. Tax L. § 1814(c)(2)**, in that on or about February 28, 2013, in the County of Kings, not being agents licensed by the Commissioner of the New York State Department of Taxation and Finance, did willfully possess or transport for the purpose of sale, thirty thousand (30,000) or more cigarettes subject to the tax imposed pursuant to New York State Law in any unstamped or unlawfully stamped packages, and/or willfully sold or offered for sale thirty thousand (30,000) or more cigarettes in any unstamped or unlawfully stamped packages.

COUNT ONE HUNDRED THIRTY-ONE

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu Saleem, each aiding the other and acting in concert, of the crime of **Money**

Laundering in the Third Degree in violation of **Penal Law § 470.10(2)(b)(i)**, in that on or about February 28, 2013, in the County of Kings, knowing that one or more monetary instruments represented the proceeds of criminal conduct, the defendants transported, transmitted, or transferred, or attempted to transport, transmit or transfer, on one or more occasions, monetary instruments which in fact represented the proceeds of specified criminal conduct, as that term is defined in Article 470 of the Penal Law, from a place in any county in this state to or through a place outside that county or to a place in any county in this state from or through a place outside that county, with intent to promote the carrying on of criminal conduct, and the total value of such monetary instrument or instruments exceeded fifty thousand dollars.

COUNT ONE HUNDRED THIRTY-TWO

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu Saleem, each aiding the other and acting in concert, of the crime of Money Laundering in the Third Degree in violation of **Penal Law § 470.10(1)(b)(i)(A)**, in that on or about February 28, 2013, in the County of Kings, knowing that the property involved in one or more financial transactions represented the proceeds of criminal conduct, the defendants conducted one or more such financial transactions which in fact involved the proceeds of specified criminal conduct, as that term is defined under Article 470 of the Penal Law, with intent to promote the carrying on of criminal conduct, and the total value involved in such financial transaction or transactions exceeded fifty thousand dollars.

COUNT ONE HUNDRED THIRTY-THREE

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu Saleem, each aiding the other and acting in concert, of the crime of **Attempt to Evade or Defeat Cigarette and Tobacco Products Tax** in violation of **N.Y. Tax L. §481(2)(a) & 4** and **N.Y. Tax L. § 1814(a)(i)**, in that on or about March 2, 2013, in the County of Kings, did willfully attempt in any manner to evade or defeat the taxes imposed pursuant to New York State Tax Law or payment thereof on ten thousand (10,000) or more cigarettes.

COUNT ONE HUNDRED THIRTY-FOUR

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu Saleem, each aiding the other and acting in concert, of the crime of **Possession or Transport for the Purpose of Sale, or Sale or Offering For Sale, of Thirty Thousand or More Cigarettes in Unstamped or Unlawfully Stamped Packages** in violation of **N.Y. Tax L. §481(2)(a) & 4** and **N.Y. Tax L. § 1814(c)(2)**, in that on or about March 2, 2013, in the County of Kings, not being agents licensed by the Commissioner of the New York State Department of Taxation and Finance, did willfully possess or transport for the purpose of sale, thirty thousand (30,000) or more cigarettes subject to the tax imposed pursuant to New York State Law in any unstamped or unlawfully stamped packages,

and/or willfully sold or offered for sale thirty thousand (30,000) or more cigarettes in any unstamped or unlawfully stamped packages.

COUNT ONE HUNDRED THIRTY-FIVE

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu Saleem, each aiding the other and acting in concert, of the crime of Money Laundering in the Third Degree in violation of **Penal Law § 470.10(2)(b)(i)**, in that on or about March 2, 2013, in the County of Kings, knowing that one or more monetary instruments represented the proceeds of criminal conduct, the defendants transported, transmitted, or transferred, or attempted to transport, transmit or transfer, on one or more occasions, monetary instruments which in fact represented the proceeds of specified criminal conduct, as that term is defined in Article 470 of the Penal Law, from a place in any county in this state to or through a place outside that county or to a place in any county in this state from or through a place outside that county, with intent to promote the carrying on of criminal conduct, and the total value of such monetary instrument or instruments exceeded fifty thousand dollars.

COUNT ONE HUNDRED THIRTY-SIX

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu Saleem, each aiding the other and acting in concert, of the crime of Money Laundering in the Third Degree in violation of **Penal Law § 470.10(1)(b)(i)(A)**, in that

on or about March 2, 2013, in the County of Kings, knowing that the property involved in one or more financial transactions represented the proceeds of criminal conduct, the defendants conducted one or more such financial transactions which in fact involved the proceeds of specified criminal conduct, as that term is defined under Article 470 of the Penal Law, with intent to promote the carrying on of criminal conduct, and the total value involved in such financial transaction or transactions exceeded fifty thousand dollars.

COUNT ONE HUNDRED THIRTY-SEVEN

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu Saleem, each aiding the other and acting in concert, of the crime of Attempt to Evade or Defeat Cigarette and Tobacco Products Tax in violation of N.Y. Tax L. §481(2)(a) & 4 and N.Y. Tax L. § 1814(a)(i), in that on or about March 2, 2013, in the County of Kings, did willfully attempt in any manner to evade or defeat the taxes imposed pursuant to New York State Tax Law or payment thereof on ten thousand (10,000) or more cigarettes.

COUNT ONE HUNDRED THIRTY-EIGHT

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu Saleem, each aiding the other and acting in concert, of the crime of Possession or Transport for the Purpose of Sale, or Sale or Offering For Sale, of Thirty Thousand or More Cigarettes in Unstamped or Unlawfully Stamped Packages in violation of

N.Y. Tax L. §481(2)(a) & 4 and N.Y. Tax L. § 1814(c)(2), in that on or about March 2, 2013, in the County of Kings, not being agents licensed by the Commissioner of the New York State Department of Taxation and Finance, did willfully possess or transport for the purpose of sale, thirty thousand (30,000) or more cigarettes subject to the tax imposed pursuant to New York State Law in any unstamped or unlawfully stamped packages, and/or willfully sold or offered for sale thirty thousand (30,000) or more cigarettes in any unstamped or unlawfully stamped packages.

COUNT ONE HUNDRED THIRTY-NINE

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu Saleem, each aiding the other and acting in concert, of the crime of **Money Laundering in the Third Degree** in violation of **Penal Law § 470.10(2)(b)(i)**, in that on or about March 2, 2013, in the County of Kings, knowing that one or more monetary instruments represented the proceeds of criminal conduct, the defendants transported, transmitted, or transferred, or attempted to transport, transmit or transfer, on one or more occasions, monetary instruments which in fact represented the proceeds of specified criminal conduct, as that term is defined in Article 470 of the Penal Law, from a place in any county in this state to or through a place outside that county or to a place in any county in this state from or through a place outside that county, with intent to promote the carrying on of criminal conduct, and the total value of such monetary instrument or instruments exceeded fifty thousand dollars.

COUNT ONE HUNDRED FORTY

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu Saleem, each aiding the other and acting in concert, of the crime of **Money Laundering in the Third Degree** in violation of **Penal Law § 470.10(1)(b)(i)(A)**, in that on or about March 2, 2013, in the County of Kings, knowing that the property involved in one or more financial transactions represented the proceeds of criminal conduct, the defendants conducted one or more such financial transactions which in fact involved the proceeds of specified criminal conduct, as that term is defined under Article 470 of the Penal Law, with intent to promote the carrying on of criminal conduct, and the total value involved in such financial transaction or transactions exceeded fifty thousand dollars.

COUNT ONE HUNDRED FORTY-ONE

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu Saleem, each aiding the other and acting in concert, of the crime of **Attempt to Evade or Defeat Cigarette and Tobacco Products Tax** in violation of **N.Y. Tax L. §481(2)(a) & 4 and N.Y. Tax L. § 1814(a)(i)**, in that on or about March 14, 2013, in the County of Kings, did willfully attempt in any manner to evade or defeat the taxes imposed pursuant to New York State Tax Law or payment thereof on ten thousand (10,000) or more cigarettes.

COUNT ONE HUNDRED FORTY-TWO

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants **Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu Saleem**, each aiding the other and acting in concert, of the crime of **Possession or Transport for the Purpose of Sale, or Sale or Offering For Sale, of Thirty Thousand or More Cigarettes in Unstamped or Unlawfully Stamped Packages** in violation of **N.Y. Tax L. §481(2)(a) & 4 and N.Y. Tax L. § 1814(c)(2)**, in that on or about March 14, 2013, in the County of Kings, not being agents licensed by the Commissioner of the New York State Department of Taxation and Finance, did willfully possess or transport for the purpose of sale, thirty thousand (30,000) or more cigarettes subject to the tax imposed pursuant to New York State Law in any unstamped or unlawfully stamped packages, and/or willfully sold or offered for sale thirty thousand (30,000) or more cigarettes in any unstamped or unlawfully stamped packages.

COUNT ONE HUNDRED FORTY-THREE

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants **Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu Saleem**, each aiding the other and acting in concert, of the crime of **Money Laundering in the Fourth Degree** in violation of **Penal Law § 470.05(2)(a)(i)**, in that on or about March 14, 2013, in the County of Kings, knowing that one or more monetary instruments represented the proceeds of criminal conduct, the defendants transported, transmitted, or transferred, on one or more occasions, monetary instruments which in fact

represented the proceeds of specified criminal conduct, as that term is defined in Article 470 of the Penal Law, with intent to promote the carrying on of criminal conduct, and the total value of such monetary instrument or instruments exceeded ten thousand dollars.

COUNT ONE HUNDRED FORTY-FOUR

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu Saleem, each aiding the other and acting in concert, of the crime of Money Laundering in the Fourth Degree in violation of Penal Law § 470.05(1)(a)(i)(A), in that on or about March 14, 2013, in the County of Kings, knowing that the property involved in one or more financial transactions represented the proceeds of criminal conduct, the defendants conducted one or more such financial transactions which in fact involved the proceeds of specified criminal conduct, as that term is defined under Article 470 of the Penal Law, with intent to promote the carrying on of criminal conduct, and the total value involved in such financial transaction or transactions exceeded five thousand dollars.

COUNT ONE HUNDRED FORTY-FIVE

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu Saleem, each aiding the other and acting in concert, of the crime of Possession or Transport for the Purpose of Sale, or Sale or Offering For Sale, of Thirty Thousand or More Cigarettes in Unstamped or Unlawfully Stamped Packages in violation of

N.Y. Tax L. §481(2)(a) & 4 and N.Y. Tax L. § 1814(c)(2), in that on or about March 15, 2013, in the County of Kings, not being agents licensed by the Commissioner of the New York State Department of Taxation and Finance, did willfully possess or transport for the purpose of sale, thirty thousand (30,000) or more cigarettes subject to the tax imposed pursuant to New York State Law in any unstamped or unlawfully stamped packages, and/or willfully sold or offered for sale thirty thousand (30,000) or more cigarettes in any unstamped or unlawfully stamped packages.

COUNT ONE HUNDRED FORTY-SIX

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu Saleem, each aiding the other and acting in concert, of the crime of **Attempt to Evade or Defeat Cigarette and Tobacco Products Tax** in violation of **N.Y. Tax L. §481(2)(a) & 4 and N.Y. Tax L. § 1814(a)(i)**, in that on or about March 15, 2013, in the County of Kings, did willfully attempt in any manner to evade or defeat the taxes imposed pursuant to New York State Tax Law or payment thereof on ten thousand (10,000) or more cigarettes.

COUNT ONE HUNDRED FORTY-SEVEN

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu Saleem, each aiding the other and acting in concert, of the crime of **Possession or Transport for the Purpose of Sale, or Sale or Offering For Sale, of Ten Thousand or**

More Cigarettes in Unstamped or Unlawfully Stamped Packages in violation of N.Y. Tax L. §481(2)(a) & 4 and N.Y. Tax L. § 1814(c)(1), in that on or about March 15, 2013, in the County of Kings, not being agents licensed by the Commissioner of the New York State Department of Taxation and Finance, did willfully possess or transport for the purpose of sale, ten thousand (10,000) or more cigarettes subject to the tax imposed pursuant to New York State Law in any unstamped or unlawfully stamped packages, and/or willfully sold or offered for sale ten thousand (10,000) or more cigarettes in any unstamped or unlawfully stamped packages.

COUNT ONE HUNDRED FORTY-EIGHT

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu Saleem, each aiding the other and acting in concert, of the crime of Attempt to Evade or Defeat Cigarette and Tobacco Products Tax in violation of N.Y. Tax L. §481(2)(a) & 4 and N.Y. Tax L. § 1814(a)(i), in that on or about March 21, 2013, in the County of Kings, did willfully attempt in any manner to evade or defeat the taxes imposed pursuant to New York State Tax Law or payment thereof on ten thousand (10,000) or more cigarettes.

COUNT ONE HUNDRED FORTY-NINE

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu Saleem, each aiding the other and acting in concert, of the crime of Possession or

Transport for the Purpose of Sale, or Sale or Offering For Sale, of Thirty Thousand or More Cigarettes in Unstamped or Unlawfully Stamped Packages in violation of **N.Y. Tax L. §481(2)(a) & 4** and **N.Y. Tax L. § 1814(c)(2)**, in that on or about March 21, 2013, in the County of Kings, not being agents licensed by the Commissioner of the New York State Department of Taxation and Finance, did willfully possess or transport for the purpose of sale, thirty thousand (30,000) or more cigarettes subject to the tax imposed pursuant to New York State Law in any unstamped or unlawfully stamped packages, and/or willfully sold or offered for sale thirty thousand (30,000) or more cigarettes in any unstamped or unlawfully stamped packages.

COUNT ONE HUNDRED FIFTY

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu Saleem, each aiding the other and acting in concert, of the crime of **Money Laundering in the Third Degree** in violation of **Penal Law § 470.10(2)(b)(i)**, in that on or about March 21, 2013, in the County of Kings, knowing that one or more monetary instruments represented the proceeds of criminal conduct, the defendants transported, transmitted, or transferred, or attempted to transport, transmit or transfer, on one or more occasions, monetary instruments which in fact represented the proceeds of specified criminal conduct, as that term is defined in Article 470 of the Penal Law, from a place in any county in this state to or through a place outside that county or to a place in any county in this state from or through a place outside that county, with intent to promote

the carrying on of criminal conduct, and the total value of such monetary instrument or instruments exceeded fifty thousand dollars.

COUNT ONE HUNDRED FIFTY-ONE

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu Saleem, each aiding the other and acting in concert, of the crime of Money Laundering in the Third Degree in violation of **Penal Law § 470.10(1)(b)(i)(A)**, in that on or about March 21, 2013, in the County of Kings, knowing that the property involved in one or more financial transactions represented the proceeds of criminal conduct, the defendants conducted one or more such financial transactions which in fact involved the proceeds of specified criminal conduct, as that term is defined under Article 470 of the Penal Law, with intent to promote the carrying on of criminal conduct, and the total value involved in such financial transaction or transactions exceeded fifty thousand dollars.

COUNT ONE HUNDRED FIFTY-TWO

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu Saleem, each aiding the other and acting in concert, of the crime of Attempt to Evade or Defeat Cigarette and Tobacco Products Tax in violation of **N.Y. Tax L. §481(2)(a) & 4 and N.Y. Tax L. § 1814(a)(i)**, in that on or about March 22, 2013, in the County of Kings, did willfully attempt in any manner to evade or defeat the taxes

imposed pursuant to New York State Tax Law or payment thereof on ten thousand (10,000) or more cigarettes.

COUNT ONE HUNDRED FIFTY-THREE

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu Saleem, each aiding the other and acting in concert, of the crime of Possession or Transport for the Purpose of Sale, or Sale or Offering For Sale, of Thirty Thousand or More Cigarettes in Unstamped or Unlawfully Stamped Packages in violation of **N.Y. Tax L. §481(2)(a) & 4 and N.Y. Tax L. § 1814(c)(2)**, in that on or about March 22, 2013, in the County of Kings, not being agents licensed by the Commissioner of the New York State Department of Taxation and Finance, did willfully possess or transport for the purpose of sale, thirty thousand (30,000) or more cigarettes subject to the tax imposed pursuant to New York State Law in any unstamped or unlawfully stamped packages, and/or willfully sold or offered for sale thirty thousand (30,000) or more cigarettes in any unstamped or unlawfully stamped packages.

COUNT ONE HUNDRED FIFTY-FOUR

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu Saleem, each aiding the other and acting in concert, of the crime of Money Laundering in the Third Degree in violation of **Penal Law § 470.10(2)(b)(i)**, in that on or about March 22, 2013, in the County of Kings, knowing that one or more monetary

instruments represented the proceeds of criminal conduct, the defendants transported, transmitted, or transferred, or attempted to transport, transmit or transfer, on one or more occasions, monetary instruments which in fact represented the proceeds of specified criminal conduct, as that term is defined in Article 470 of the Penal Law, from a place in any county in this state to or through a place outside that county or to a place in any county in this state from or through a place outside that county, with intent to promote the carrying on of criminal conduct, and the total value of such monetary instrument or instruments exceeded fifty thousand dollars.

COUNT ONE HUNDRED FIFTY-FIVE

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu Saleem, each aiding the other and acting in concert, of the crime of Money Laundering in the Third Degree in violation of Penal Law § 470.10(1)(b)(i)(A), in that on or about March 22, 2013, in the County of Kings, knowing that the property involved in one or more financial transactions represented the proceeds of criminal conduct, the defendants conducted one or more such financial transactions which in fact involved the proceeds of specified criminal conduct, as that term is defined under Article 470 of the Penal Law, with intent to promote the carrying on of criminal conduct, and the total value involved in such financial transaction or transactions exceeded fifty thousand dollars.

COUNT ONE HUNDRED FIFTY-SIX

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a.

Abu Mahdy, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu Saleem, each aiding the other and acting in concert, of the crime of **Attempt to Evade or Defeat Cigarette and Tobacco Products Tax** in violation of **N.Y. Tax L. §481(2)(a) & 4 and N.Y. Tax L. § 1814(a)(i)**, in that on or about March 24, 2013, in the County of Kings, did willfully attempt in any manner to evade or defeat the taxes imposed pursuant to New York State Tax Law or payment thereof on ten thousand (10,000) or more cigarettes.

COUNT ONE HUNDRED FIFTY-SEVEN

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu Saleem, each aiding the other and acting in concert, of the crime of **Possession or Transport for the Purpose of Sale, or Sale or Offering For Sale, of Thirty Thousand or More Cigarettes in Unstamped or Unlawfully Stamped Packages** in violation of **N.Y. Tax L. §481(2)(a) & 4 and N.Y. Tax L. § 1814(c)(2)**, in that on or about March 24, 2013, in the County of Kings, not being agents licensed by the Commissioner of the New York State Department of Taxation and Finance, did willfully possess or transport for the purpose of sale, thirty thousand (30,000) or more cigarettes subject to the tax imposed pursuant to New York State Law in any unstamped or unlawfully stamped packages, and/or willfully sold or offered for sale thirty thousand (30,000) or more cigarettes in any unstamped or unlawfully stamped packages.

COUNT ONE HUNDRED FIFTY-EIGHT

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu Saleem, each aiding the other and acting in concert, of the crime of **Money Laundering in the Third Degree** in violation of **Penal Law § 470.10(2)(b)(i)**, in that on or about March 24, 2013, in the County of Kings, knowing that one or more monetary instruments represented the proceeds of criminal conduct, the defendants transported, transmitted, or transferred, or attempted to transport, transmit or transfer, on one or more occasions, monetary instruments which in fact represented the proceeds of specified criminal conduct, as that term is defined in Article 470 of the Penal Law, from a place in any county in this state to or through a place outside that county or to a place in any county in this state from or through a place outside that county, with intent to promote the carrying on of criminal conduct, and the total value of such monetary instrument or instruments exceeded fifty thousand dollars.

COUNT ONE HUNDRED FIFTY-NINE

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali and Mufeed Attal, a.k.a. Abu Saleem, each aiding the other and acting in concert, of the crime of **Money Laundering in the Third Degree** in violation of **Penal Law § 470.10(1)(b)(i)(A)**, in that on or about March 24, 2013, in the County of Kings, knowing that the property involved in one or more financial transactions represented the proceeds of criminal conduct, the

defendants conducted one or more such financial transactions which in fact involved the proceeds of specified criminal conduct, as that term is defined under Article 470 of the Penal Law, with intent to promote the carrying on of criminal conduct, and the total value involved in such financial transaction or transactions exceeded fifty thousand dollars.

COUNT ONE HUNDRED SIXTY

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Ahmad Abdelaziz, a.k.a. Al Jaba'I, Ribhi Awawdeh and Mohamed Abed Alabed Awawdeh, a.k.a. Abu Samir, each aiding the other and acting in concert, of the crime of Attempt to Evade or Defeat Cigarette and Tobacco Products Tax in violation of N.Y. Tax L. §481(2)(a) & 4 and N.Y. Tax L. § 1814(a)(i), in that on or about December 26, 2012, in the County of Kings, did willfully attempt in any manner to evade or defeat the taxes imposed pursuant to New York State Tax Law or payment thereof on ten thousand (10,000) or more cigarettes.

COUNT ONE HUNDRED SIXTY-ONE

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Ahmad Abdelaziz, a.k.a. Al Jaba'I, Ribhi Awawdeh and Mohamed Abed Alabed Awawdeh, a.k.a. Abu Samir, each aiding the other and acting in concert, of the crime of Possession or Transport for the Purpose of Sale, or Sale or Offering For Sale, of Thirty Thousand or More Cigarettes in Unstamped or Unlawfully Stamped Packages in violation of N.Y. Tax L. §481(2)(a) & 4 and N.Y. Tax L. § 1814(c)(2), in that on or about December 26,

2012, in the County of Kings, not being agents licensed by the Commissioner of the New York State Department of Taxation and Finance, did willfully possess or transport for the purpose of sale, thirty thousand (30,000) or more cigarettes subject to the tax imposed pursuant to New York State Law in any unstamped or unlawfully stamped packages, and/or willfully sold or offered for sale thirty thousand (30,000) or more cigarettes in any unstamped or unlawfully stamped packages.

COUNT ONE HUNDRED SIXTY-TWO

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Ahmad Abdelaziz, a.k.a. Al Jaba'I, Ribhi Awawdeh and Mohamed Abed Alabed Awawdeh, a.k.a. Abu Samir, each aiding the other and acting in concert, of the crime of **Money Laundering in the Third Degree** in violation of **Penal Law § 470.10(2)(b)(i)**, in that on or about December 26, 2012, in the County of Kings, knowing that one or more monetary instruments represented the proceeds of criminal conduct, the defendants transported, transmitted, or transferred, or attempted to transport, transmit or transfer, on one or more occasions, monetary instruments which in fact represented the proceeds of specified criminal conduct, as that term is defined in Article 470 of the Penal Law, from a place in any county in this state to or through a place outside that county or to a place in any county in this state from or through a place outside that county, with intent to promote the carrying on of criminal conduct, and the total value of such monetary instrument or instruments exceeded fifty thousand dollars.

COUNT ONE HUNDRED SIXTY-THREE

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Ahmad Abdelaziz, a.k.a. Al Jaba'I, Ribhi Awawdeh and Mohamed Abed Alabed Awawdeh, a.k.a. Abu Samir, each aiding the other and acting in concert, of the crime of **Money Laundering in the Third Degree** in violation of **Penal Law § 470.10(1)(b)(i)(A)**, in that on or about December 26, 2012, in the County of Kings, knowing that the property involved in one or more financial transactions represented the proceeds of criminal conduct, the defendants conducted one or more such financial transactions which in fact involved the proceeds of specified criminal conduct, as that term is defined under Article 470 of the Penal Law, with intent to promote the carrying on of criminal conduct, and the total value involved in such financial transaction or transactions exceeded fifty thousand dollars.

COUNT ONE HUNDRED SIXTY-FOUR

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Issa Sulieman, Ribhi Awawdeh, Mohamed Abed Alabed Awawdeh, a.k.a. Abu Samir and Ahmad Abdelaziz, a.k.a. Al Jaba'I, each aiding the other and acting in concert, of the crime of **Attempt to Evade or Defeat Cigarette and Tobacco Products Tax** in violation of **N.Y. Tax L. §481(2)(a) & 4** and **N.Y. Tax L. § 1814(a)(i)**, in that on or about January 7, 2013, in the County of Kings, did willfully

attempt in any manner to evade or defeat the taxes imposed pursuant to New York State Tax Law or payment thereof on ten thousand (10,000) or more cigarettes.

COUNT ONE HUNDRED SIXTY-FIVE

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Issa Sulieman, Ribhi Awawdeh, Mohamed Abed Alabed Awawdeh, a.k.a. Abu Samir and Ahmad Abdelaziz, a.k.a. Al Jaba'I, each aiding the other and acting in concert, of the crime of Possession or Transport for the Purpose of Sale, or Sale or Offering For Sale, of Thirty Thousand or More Cigarettes in Unstamped or Unlawfully Stamped Packages in violation of N.Y. Tax L. §481(2)(a) & 4 and N.Y. Tax L. § 1814(c)(2), in that on or about January 7, 2013, in the County of Kings, not being agents licensed by the Commissioner of the New York State Department of Taxation and Finance, did willfully possess or transport for the purpose of sale, thirty thousand (30,000) or more cigarettes subject to the tax imposed pursuant to New York State Law in any unstamped or unlawfully stamped packages, and/or willfully sold or offered for sale thirty thousand (30,000) or more cigarettes in any unstamped or unlawfully stamped packages.

COUNT ONE HUNDRED SIXTY-SIX

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Issa Sulieman, Ribhi Awawdeh, Mohamed Abed Alabed Awawdeh,

a.k.a. Abu Samir and Ahmad Abdelaziz, a.k.a. Al Jaba'I, each aiding the other and acting in concert, of the crime of **Money Laundering in the Third Degree** in violation of **Penal Law § 470.10(2)(b)(i)**, in that on or about January 7, 2013, in the County of Kings, knowing that one or more monetary instruments represented the proceeds of criminal conduct, the defendants transported, transmitted, or transferred, or attempted to transport, transmit or transfer, on one or more occasions, monetary instruments which in fact represented the proceeds of specified criminal conduct, as that term is defined in Article 470 of the Penal Law, from a place in any county in this state to or through a place outside that county or to a place in any county in this state from or through a place outside that county, with intent to promote the carrying on of criminal conduct, and the total value of such monetary instrument or instruments exceeded fifty thousand dollars.

COUNT ONE HUNDRED SIXTY-SEVEN

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Issa Sulieman, Ribhi Awawdeh, Mohamed Abed Alabed Awawdeh, a.k.a. Abu Samir and Ahmad Abdelaziz, a.k.a. Al Jaba'I, each aiding the other and acting in concert, of the crime of **Money Laundering in the Third Degree** in violation of **Penal Law § 470.10(1)(b)(i)(A)**, in that on or about January 7, 2013, in the County of Kings, knowing that the property involved in one or more financial transactions represented the proceeds of criminal conduct, the defendants conducted one or more such financial transactions which in fact involved the proceeds of specified criminal conduct,

as that term is defined under Article 470 of the Penal Law, with intent to promote the carrying on of criminal conduct, and the total value involved in such financial transaction or transactions exceeded fifty thousand dollars.

COUNT ONE HUNDRED SIXTY-EIGHT

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Ribhi Awawdeh, Mohamed Abed Alabed Awawdeh, a.k.a. Abu Samir and Ahmad Abdelaziz, a.k.a. Al Jaba'I, each aiding the other and acting in concert, of the crime of Attempt to Evade or Defeat Cigarette and Tobacco Products Tax in violation of N.Y. Tax L. §481(2)(a) & 4 and N.Y. Tax L. § 1814(a)(i), in that on or about January 9, 2013, in the County of Kings, did willfully attempt in any manner to evade or defeat the taxes imposed pursuant to New York State Tax Law or payment thereof on ten thousand (10,000) or more cigarettes.

COUNT ONE HUNDRED SIXTY-NINE

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Ribhi Awawdeh, Mohamed Abed Alabed Awawdeh, a.k.a. Abu Samir and Ahmad Abdelaziz, a.k.a. Al Jaba'I, each aiding the other and acting in concert, of the crime of Possession or Transport for the Purpose of Sale, or Sale or Offering For Sale, of Thirty Thousand or More Cigarettes in Unstamped or Unlawfully Stamped Packages in violation of N.Y. Tax L. §481(2)(a) & 4 and N.Y. Tax L. § 1814(c)(2), in that on or about January 9, 2013, in the County of Kings, not being agents licensed by the Commissioner of the New York State Department of

Taxation and Finance, did willfully possess or transport for the purpose of sale, thirty thousand (30,000) or more cigarettes subject to the tax imposed pursuant to New York State Law in any unstamped or unlawfully stamped packages, and/or willfully sold or offered for sale thirty thousand (30,000) or more cigarettes in any unstamped or unlawfully stamped packages.

COUNT ONE HUNDRED SEVENTY

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Ribhi Awawdeh, Mohamed Abed Alabed Awawdeh, a.k.a. Abu Samir and Ahmad Abdelaziz, a.k.a. Al Jaba'I, each aiding the other and acting in concert, of the crime of Money Laundering in the Third Degree in violation of Penal Law § 470.10(2)(b)(i), in that on or about January 9, 2013, in the County of Kings, knowing that one or more monetary instruments represented the proceeds of criminal conduct, the defendants transported, transmitted, or transferred, or attempted to transport, transmit or transfer, on one or more occasions, monetary instruments which in fact represented the proceeds of specified criminal conduct, as that term is defined in Article 470 of the Penal Law, from a place in any county in this state to or through a place outside that county or to a place in any county in this state from or through a place outside that county, with intent to promote the carrying on of criminal conduct, and the total value of such monetary instrument or instruments exceeded fifty thousand dollars.

COUNT ONE HUNDRED SEVENTY-ONE

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Ribhi Awawdeh, Mohamed Abed Alabed Awawdeh, a.k.a. Abu Samir and Ahmad Abdelaziz, a.k.a. Al Jaba'I, each aiding the other and acting in concert, of the crime of **Money Laundering in the Third Degree** in violation of **Penal Law § 470.10(1)(b)(i)(A)**, in that on or about January 9, 2013, in the County of Kings, knowing that the property involved in one or more financial transactions represented the proceeds of criminal conduct, the defendants conducted one or more such financial transactions which in fact involved the proceeds of specified criminal conduct, as that term is defined under Article 470 of the Penal Law, with intent to promote the carrying on of criminal conduct, and the total value involved in such financial transaction or transactions exceeded fifty thousand dollars.

COUNT ONE HUNDRED SEVENTY-TWO

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Ribhi Awawdeh, Mohamed Abed Alabed Awawdeh, a.k.a. Abu Samir and Ahmad Abdelaziz, a.k.a. Al Jaba'I, each aiding the other and acting in concert, of the crime of **Attempt to Evade or Defeat Cigarette and Tobacco Products Tax** in violation of **N.Y. Tax L. §481(2)(a) & 4** and **N.Y. Tax L. § 1814(a)(i)**, in that on or about January 27, 2013, in the County of Kings, did willfully attempt in any manner to evade or defeat the taxes imposed pursuant to New York State Tax Law or payment thereof on ten thousand (10,000) or more cigarettes.

COUNT ONE HUNDRED SEVENTY-THREE

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Ribhi Awawdeh, Mohamed Abed Alabed Awawdeh, a.k.a. Abu Samir and Ahmad Abdelaziz, a.k.a. Al Jaba'I, each aiding the other and acting in concert, of the crime of **Possession or Transport for the Purpose of Sale, or Sale or Offering For Sale, of Thirty Thousand or More Cigarettes in Unstamped or Unlawfully Stamped Packages** in violation of **N.Y. Tax L. §481(2)(a) & 4 and N.Y. Tax L. § 1814(c)(2)**, in that on or about January 27, 2013, in the County of Kings, not being agents licensed by the Commissioner of the New York State Department of Taxation and Finance, did willfully possess or transport for the purpose of sale, thirty thousand (30,000) or more cigarettes subject to the tax imposed pursuant to New York State Law in any unstamped or unlawfully stamped packages, and/or willfully sold or offered for sale thirty thousand (30,000) or more cigarettes in any unstamped or unlawfully stamped packages.

COUNT ONE HUNDRED SEVENTY-FOUR

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Ribhi Awawdeh, Mohamed Abed Alabed Awawdeh, a.k.a. Abu Samir and Ahmad Abdelaziz, a.k.a. Al Jaba'I, each aiding the other and acting in concert, of the crime of **Money Laundering in the Third Degree** in violation of **Penal Law § 470.10(2)(b)(i)** in that on or about January 27, 2013, in the County of Kings, knowing that one or more monetary instruments

represented the proceeds of criminal conduct, the defendants transported, transmitted, or transferred, or attempted to transport, transmit or transfer, on one or more occasions, monetary instruments which in fact represented the proceeds of specified criminal conduct, as that term is defined in Article 470 of the Penal Law, from a place in any county in this state to or through a place outside that county or to a place in any county in this state from or through a place outside that county, with intent to promote the carrying on of criminal conduct, and the total value of such monetary instrument or instruments exceeded fifty thousand dollars.

COUNT ONE HUNDRED SEVENTY-FIVE

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Ribhi Awawdeh, Mohamed Abed Alabed Awawdeh, a.k.a. Abu Samir and Ahmad Abdelaziz, a.k.a. Al Jaba'I, each aiding the other and acting in concert, of the crime of **Money Laundering in the Third Degree** in violation of **Penal Law § 470.10(1)(b)(i)(A)**, in that on or about January 27, 2013, in the County of Kings, knowing that the property involved in one or more financial transactions represented the proceeds of criminal conduct, the defendants conducted one or more such financial transactions which in fact involved the proceeds of specified criminal conduct, as that term is defined under Article 470 of the Penal Law, with intent to promote the carrying on of criminal conduct, and the total value involved in such financial transaction or transactions exceeded fifty thousand dollars.

COUNT ONE HUNDRED SEVENTY-SIX

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Issa Sulieman, Ahmad Abdelaziz, a.k.a. Al Jaba'I, Ribhi Awawdeh and Mohamed Abed Alabed Awawdeh, a.k.a. Abu Samir, each aiding the other and acting in concert, of the crime of **Attempt to Evade or Defeat Cigarette and Tobacco Products Tax** in violation of N.Y. Tax L. §481(2)(a) & 4 and N.Y. Tax L. § 1814(a)(i), in that on or about February 11, 2013, in the County of Kings, did willfully attempt in any manner to evade or defeat the taxes imposed pursuant to New York State Tax Law or payment thereof on ten thousand (10,000) or more cigarettes.

COUNT ONE HUNDRED SEVENTY-SEVEN

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Issa Sulieman, Ahmad Abdelaziz, a.k.a. Al Jaba'I, Ribhi Awawdeh and Mohamed Abed Alabed Awawdeh, a.k.a. Abu Samir, each aiding the other and acting in concert, of the crime of **Possession or Transport for the Purpose of Sale, or Sale or Offering For Sale, of Thirty Thousand or More Cigarettes in Unstamped or Unlawfully Stamped Packages** in violation of N.Y. Tax L. §481(2)(a) & 4 and N.Y. Tax L. § 1814(c)(2), in that on or about February 11, 2013, in the County of Kings, not being agents licensed by the Commissioner of the New York State Department of Taxation and Finance, did willfully possess or transport for the purpose of sale, thirty

thousand (30,000) or more cigarettes subject to the tax imposed pursuant to New York State Law in any unstamped or unlawfully stamped packages, and/or willfully sold or offered for sale thirty thousand (30,000) or more cigarettes in any unstamped or unlawfully stamped packages.

COUNT ONE HUNDRED SEVENTY-EIGHT

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Issa Sulieman, Ahmad Abdelaziz, a.k.a. Al Jaba'I, Ribhi Awawdeh and Mohamed Abed Alabed Awawdeh, a.k.a. Abu Samir, each aiding the other and acting in concert, of the crime of Money Laundering in the Second Degree in violation of Penal Law § 470.15(2)(b)(i), in that on or about February 11, 2013, in the County of Kings, knowing that one or more monetary instruments represented the proceeds of specified criminal conduct, the defendants transported, transmitted, or transferred, or attempted to transport, transmit or transfer, on one or more occasions, monetary instruments which in fact represented the proceeds of specified criminal conduct, as that term is defined in Article 470 of the Penal Law, from a place in any county in this state to or through a place outside that county or to a place in any county in this state from or through a place outside that county, with intent to promote the carrying on of specified criminal conduct, and the total value of such monetary instrument or instruments exceeded one hundred thousand dollars.

COUNT ONE HUNDRED SEVENTY-NINE

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Issa Sulieman, Ahmad Abdelaziz, a.k.a. Al Jaba'I, Ribhi Awawdeh and Mohamed Abed Alabed Awawdeh, a.k.a. Abu Samir, each aiding the other and acting in concert, of the crime of **Money Laundering in the Second Degree** in violation of **Penal Law § 470.15(1)(b)(i)(A)**, in that on or about February 11, 2013, in the County of Kings, knowing that the property involved in one or more financial transactions represented the proceeds of specified criminal conduct, the defendants conducted one or more such financial transactions which in fact involved the proceeds of specified criminal conduct, as that term is defined under Article 470 of the Penal Law, with intent to promote the carrying on of specified criminal conduct, and the total value involved in such financial transaction or transactions exceeded one hundred thousand dollars.

COUNT ONE HUNDRED EIGHTY

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Issa Sulieman, Ahmad Abdelaziz, a.k.a. Al Jaba'I, Ribhi Awawdeh and Mohamed Abed Alabed Awawdeh, a.k.a. Abu Samir, each aiding the other and acting in concert, of the crime of **Attempt to Evade or Defeat Cigarette and Tobacco Products Tax** in violation of **N.Y. Tax L. §481(2)(a) & 4** and **N.Y. Tax L. § 1814(a)(i)**, in that on or about February 27, 2013, in the County of Kings, did willfully

attempt in any manner to evade or defeat the taxes imposed pursuant to New York State Tax Law or payment thereof on ten thousand (10,000) or more cigarettes.

COUNT ONE HUNDRED EIGHTY-ONE

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Issa Sulieman, Ahmad Abdelaziz, a.k.a. Al Jaba'I, Ribhi Awawdeh and Mohamed Abed Alabed Awawdeh, a.k.a. Abu Samir, each aiding the other and acting in concert, of the crime of Possession or Transport for the Purpose of Sale, or Sale or Offering For Sale, of Thirty Thousand or More Cigarettes in Unstamped or Unlawfully Stamped Packages in violation of N.Y. Tax L. §481(2)(a) & 4 and N.Y. Tax L. § 1814(c)(2), in that on or about February 27, 2013, in the County of Kings, not being agents licensed by the Commissioner of the New York State Department of Taxation and Finance, did willfully possess or transport for the purpose of sale, thirty thousand (30,000) or more cigarettes subject to the tax imposed pursuant to New York State Law in any unstamped or unlawfully stamped packages, and/or willfully sold or offered for sale thirty thousand (30,000) or more cigarettes in any unstamped or unlawfully stamped packages.

COUNT ONE HUNDRED EIGHTY-TWO

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Issa Sulieman, Ahmad Abdelaziz, a.k.a. Al Jaba'I, Ribhi Awawdeh and

Mohamed Abed Alabed Awawdeh, a.k.a. Abu Samir, each aiding the other and acting in concert, of the crime of **Money Laundering in the Second Degree** in violation of **Penal Law § 470.15(2)(b)(i)**, in that on or about February 27, 2013, in the County of Kings, knowing that one or more monetary instruments represented the proceeds of specified criminal conduct, the defendants transported, transmitted, or transferred, or attempted to transport, transmit or transfer, on one or more occasions, monetary instruments which in fact represented the proceeds of specified criminal conduct, as that term is defined in Article 470 of the Penal Law, from a place in any county in this state to or through a place outside that county or to a place in any county in this state from or through a place outside that county, with intent to promote the carrying on of specified criminal conduct, and the total value of such monetary instrument or instruments exceeded one hundred thousand dollars.

COUNT ONE HUNDRED EIGHTY-THREE

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants **Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Issa Sulieman, Ahmad Abdelaziz, a.k.a. Al Jaba'I, Ribhi Awawdeh and Mohamed Abed Alabed Awawdeh, a.k.a. Abu Samir**, each aiding the other and acting in concert, of the crime of **Money Laundering in the Second Degree** in violation of **Penal Law § 470.15(1)(b)(i)(A)**, in that on or about February 27, 2013, in the County of Kings, knowing that the property involved in one or more financial transactions represented the proceeds of specified criminal conduct, the defendants conducted one or more such financial transactions which in fact involved the proceeds of specified criminal

conduct, as that term is defined under Article 470 of the Penal Law, with intent to promote the carrying on of specified criminal conduct, and the total value involved in such financial transaction or transactions exceeded one hundred thousand dollars.

COUNT ONE HUNDRED EIGHTY-FOUR

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Issa Sulieman, Bassam Twam and Muaffaq Askar, each aiding the other and acting in concert, of the crime of Attempt to Evade or Defeat Cigarette and Tobacco Products Tax in violation of N.Y. Tax L. §481(2)(a) & 4 and N.Y. Tax L. § 1814(a)(i), in that on or about March 16, 2013, in the County of Kings, did willfully attempt in any manner to evade or defeat the taxes imposed pursuant to New York State Tax Law or payment thereof on ten thousand (10,000) or more cigarettes.

COUNT ONE HUNDRED EIGHTY-FIVE

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Issa Sulieman, Bassam Twam and Muaffaq Askar, each aiding the other and acting in concert, of the crime of Possession or Transport for the Purpose of Sale, or Sale or Offering For Sale, of Thirty Thousand or More Cigarettes in Unstamped or Unlawfully Stamped Packages in violation of N.Y. Tax L. §481(2)(a) & 4 and N.Y. Tax L. § 1814(c)(2), in that on or about March 16, 2013, in the County of Kings, not being agents licensed by the Commissioner of the New York State Department of

Taxation and Finance, did willfully possess or transport for the purpose of sale, thirty thousand (30,000) or more cigarettes subject to the tax imposed pursuant to New York State Law in any unstamped or unlawfully stamped packages, and/or willfully sold or offered for sale thirty thousand (30,000) or more cigarettes in any unstamped or unlawfully stamped packages.

COUNT ONE HUNDRED EIGHTY-SIX

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Issa Sulieman, Bassam Twam and Muaffaq Askar, each aiding the other and acting in concert, of the crime of Money Laundering in the Third Degree in violation of Penal Law § 470.10(2)(b)(i), in that on or about March 16, 2013, in the County of Kings, knowing that one or more monetary instruments represented the proceeds of criminal conduct, the defendants transported, transmitted, or transferred, or attempted to transport, transmit or transfer, on one or more occasions, monetary instruments which in fact represented the proceeds of specified criminal conduct, as that term is defined in Article 470 of the Penal Law, from a place in any county in this state to or through a place outside that county or to a place in any county in this state from or through a place outside that county, with intent to promote the carrying on of criminal conduct, and the total value of such monetary instrument or instruments exceeded fifty thousand dollars.

COUNT ONE HUNDRED EIGHTY-SEVEN

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Issa Sulieman, Bassam Twam and Muaffaq Askar, each aiding the other and acting in concert, of the crime of **Money Laundering in the Third Degree** in violation of **Penal Law § 470.10(1)(b)(i)(A)**, in that on or about March 16, 2013, in the County of Kings, knowing that the property involved in one or more financial transactions represented the proceeds of criminal conduct, the defendants conducted one or more such financial transactions which in fact involved the proceeds of specified criminal conduct, as that term is defined under Article 470 of the Penal Law, with intent to promote the carrying on of criminal conduct, and the total value involved in such financial transaction or transactions exceeded fifty thousand dollars.

COUNT ONE HUNDRED EIGHTY-EIGHT

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Issa Sulieman, Bassam Twam, Muaffaq Askar and Ahmad Abdelaziz, a.k.a. Al Jaba'I, each aiding the other and acting in concert, of the crime of **Attempt to Evade or Defeat Cigarette and Tobacco Products Tax** in violation of **N.Y. Tax L. §481(2)(a) & 4** and **N.Y. Tax L. § 1814(a)(i)**, in that on or about March 20, 2013, in the County of Kings, did willfully attempt in any manner to evade or defeat the taxes

imposed pursuant to New York State Tax Law or payment thereof on ten thousand (10,000) or more cigarettes.

COUNT ONE HUNDRED EIGHTY-NINE

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Issa Sulieman, Bassam Twam, Muaffaq Askar and Ahmad Abdelaziz, a.k.a. Al Jaba'I, each aiding the other and acting in concert, of the crime of **Possession or Transport for the Purpose of Sale, or Sale or Offering For Sale, of Thirty Thousand or More Cigarettes in Unstamped or Unlawfully Stamped Packages** in violation of **N.Y. Tax L. §481(2)(a) & 4 and N.Y. Tax L. § 1814(c)(2)**, in that on or about March 20, 2013, in the County of Kings, not being agents licensed by the Commissioner of the New York State Department of Taxation and Finance, did willfully possess or transport for the purpose of sale, thirty thousand (30,000) or more cigarettes subject to the tax imposed pursuant to New York State Law in any unstamped or unlawfully stamped packages, and/or willfully sold or offered for sale thirty thousand (30,000) or more cigarettes in any unstamped or unlawfully stamped packages.

COUNT ONE HUNDRED NINETY

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Issa Sulieman, Bassam Twam, Muaffaq Askar and Ahmad Abdelaziz, a.k.a. Al Jaba'I, each aiding the other and acting in concert, of the crime of **Money**

Laundering in the Second Degree in violation of **Penal Law § 470.15(2)(b)(i)**, in that on or about March 20, 2013, in the County of Kings, knowing that one or more monetary instruments represented the proceeds of specified criminal conduct, the defendants transported, transmitted, or transferred, or attempted to transport, transmit or transfer, on one or more occasions, monetary instruments which in fact represented the proceeds of specified criminal conduct, as that term is defined in Article 470 of the Penal Law, from a place in any county in this state to or through a place outside that county or to a place in any county in this state from or through a place outside that county, with intent to promote the carrying on of specified criminal conduct, and the total value of such monetary instrument or instruments exceeded one hundred thousand dollars.

COUNT ONE HUNDRED NINETY-ONE

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Issa Sulieman, Bassam Twam, Muaffaq Askar and Ahmad Abdelaziz, a.k.a. Al Jaba'I, each aiding the other and acting in concert, of the crime of **Money Laundering in the Second Degree** in violation of **Penal Law § 470.15(1)(b)(i)(A)**, in that on or about March 20, 2013, in the County of Kings, knowing that the property involved in one or more financial transactions represented the proceeds of specified criminal conduct, the defendants conducted one or more such financial transactions which in fact involved the proceeds of specified criminal conduct, as that term is defined under Article 470 of the Penal Law, with intent to promote the carrying on of specified

criminal conduct, and the total value involved in such financial transaction or transactions exceeded one hundred thousand dollars.

COUNT ONE HUNDRED NINETY-TWO

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Issa Sulieman and Muaffaq Askar, each aiding the other and acting in concert, of the crime of Attempt to Evade or Defeat Cigarette and Tobacco Products Tax in violation of N.Y. Tax L. §481(2)(a) & 4 and N.Y. Tax L. § 1814(a)(i), in that on or about February 13, 2013, in the County of Kings, did willfully attempt in any manner to evade or defeat the taxes imposed pursuant to New York State Tax Law or payment thereof on ten thousand (10,000) or more cigarettes.

COUNT ONE HUNDRED NINETY-THREE

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Issa Sulieman and Muaffaq Askar, each aiding the other and acting in concert, of the crime of Possession or Transport for the Purpose of Sale, or Sale or Offering For Sale, of Thirty Thousand or More Cigarettes in Unstamped or Unlawfully Stamped Packages in violation of N.Y. Tax L. §481(2)(a) & 4 and N.Y. Tax L. § 1814(c)(2), in that on or about February 13, 2013, in the County of Kings, not being agents licensed by the Commissioner of the New York State Department of Taxation and Finance, did willfully possess or transport for the purpose of sale, thirty

thousand (30,000) or more cigarettes subject to the tax imposed pursuant to New York State Law in any unstamped or unlawfully stamped packages, and/or willfully sold or offered for sale thirty thousand (30,000) or more cigarettes in any unstamped or unlawfully stamped packages.

COUNT ONE HUNDRED NINETY-FOUR

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Issa Sulieman and Muaffaq Askar, of the crime of Money Laundering in the Fourth Degree in violation of Penal Law § 470.05(2)(a)(i), in that on or about February 13, 2013, in the County of Kings, knowing that one or more monetary instruments represented the proceeds of criminal conduct, the defendants transported, transmitted, or transferred, on one or more occasions, monetary instruments which in fact represented the proceeds of specified criminal conduct, as that term is defined in Article 470 of the Penal Law, with intent to promote the carrying on of criminal conduct, and the total value of such monetary instrument or instruments exceeded ten thousand dollars.

COUNT ONE HUNDRED NINETY-FIVE

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Issa Sulieman and Muaffaq Askar, of the crime of Money Laundering in the Fourth Degree in violation of Penal Law § 470.05(1)(a)(i)(A), in that on or about February 13, 2013, in the County of Kings, knowing that the property involved in one or

more financial transactions represented the proceeds of criminal conduct, the defendants conducted one or more such financial transactions which in fact involved the proceeds of specified criminal conduct, as that term is defined under Article 470 of the Penal Law, with intent to promote the carrying on of criminal conduct, and the total value involved in such financial transaction or transactions exceeded five thousand dollars.

COUNT ONE HUNDRED NINETY-SIX

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Issa Sulieman and Muaffaq Askar, each aiding the other and acting in concert, of the crime of Attempt to Evade or Defeat Cigarette and Tobacco Products Tax in violation of N.Y. Tax L. §481(2)(a) & 4 and N.Y. Tax L. § 1814(a)(i), in that on or about February 21, 2013, in the County of Kings, did willfully attempt in any manner to evade or defeat the taxes imposed pursuant to New York State Tax Law or payment thereof on ten thousand (10,000) or more cigarettes.

COUNT ONE HUNDRED NINETY-SEVEN

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Issa Sulieman and Muaffaq Askar, each aiding the other and acting in concert, of the crime of Possession or Transport for the Purpose of Sale, or Sale or Offering For Sale, of Thirty Thousand or More Cigarettes in Unstamped or Unlawfully Stamped Packages in violation of N.Y. Tax L. §481(2)(a) & 4 and N.Y.

Tax L. § 1814(c)(2), in that on or about February 21, 2013, in the County of Kings, not being agents licensed by the Commissioner of the New York State Department of Taxation and Finance, did willfully possess or transport for the purpose of sale, thirty thousand (30,000) or more cigarettes subject to the tax imposed pursuant to New York State Law in any unstamped or unlawfully stamped packages, and/or willfully sold or offered for sale thirty thousand (30,000) or more cigarettes in any unstamped or unlawfully stamped packages.

COUNT ONE HUNDRED NINETY-EIGHT

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Issa Sulieman and Muaffaq Askar, of the crime of Money Laundering in the Fourth Degree in violation of **Penal Law § 470.05(2)(a)(i)**, in that on or about February 21, 2013, in the County of Kings, knowing that one or more monetary instruments represented the proceeds of criminal conduct, the defendants transported, transmitted, or transferred, on one or more occasions, monetary instruments which in fact represented the proceeds of specified criminal conduct, as that term is defined in Article 470 of the Penal Law, with intent to promote the carrying on of criminal conduct, and the total value of such monetary instrument or instruments exceeded ten thousand dollars.

COUNT ONE HUNDRED NINETY-NINE

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu

Mahmoud, Issa Sulieman and Muaffaq Askar, of the crime of **Money Laundering in the Fourth Degree** in violation of **Penal Law § 470.05(1)(a)(i)(A)**, in that on or about February 21, 2013, in the County of Kings, knowing that the property involved in one or more financial transactions represented the proceeds of criminal conduct, the defendants conducted one or more such financial transactions which in fact involved the proceeds of specified criminal conduct, as that term is defined under Article 470 of the Penal Law, with intent to promote the carrying on of criminal conduct, and the total value involved in such financial transaction or transactions exceeded five thousand dollars.

COUNT TWO HUNDRED

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants **Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Issa Sulieman, Ahmad Abdelaziz, a.k.a. Al Jaba'I, Ribhi Awawdeh, Mohamed Abed Alabed Awawdeh, a.k.a. Abu Samir, Muaffaq Askar and Mohannad Seif**, each aiding the other and acting in concert, of the crime of **Attempt to Evade or Defeat Cigarette and Tobacco Products Tax** in violation of **N.Y. Tax L. § 481(2)(a) & 4 and N.Y. Tax L. § 1814(a)(i)**, in that on or about March 6, 2013, in the County of Kings, did willfully attempt in any manner to evade or defeat the taxes imposed pursuant to New York State Tax Law or payment thereof on ten thousand (10,000) or more cigarettes.

COUNT TWO HUNDRED-ONE

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants **Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a.**

Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Issa Sulieman, Ahmad Abdelaziz, a.k.a. Al Jaba'I, Ribhi Awawdeh, Mohamed Abed Alabed Awawdeh, a.k.a. Abu Samir, Muaffaq Askar and Mohannad Seif, each aiding the other and acting in concert, of the crime of **Possession or Transport for the Purpose of Sale, or Sale or Offering For Sale, of Thirty Thousand or More Cigarettes in Unstamped or Unlawfully Stamped Packages** in violation of **N.Y. Tax L. § 481(2)(a) & 4** and **N.Y. Tax L. § 1814(c)(2)**, in that on or about March 6, 2013, in the County of Kings, not being agents licensed by the Commissioner of the New York State Department of Taxation and Finance, did willfully possess or transport for the purpose of sale, thirty thousand (30,000) or more cigarettes subject to the tax imposed pursuant to New York State Law in any unstamped or unlawfully stamped packages, and/or willfully sold or offered for sale thirty thousand (30,000) or more cigarettes in any unstamped or unlawfully stamped packages.

COUNT TWO HUNDRED-TWO

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants **Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Issa Sulieman, Ahmad Abdelaziz, a.k.a. Al Jaba'I, Ribhi Awawdeh, Mohamed Abed Alabed Awawdeh, a.k.a. Abu Samir, Muaffaq Askar and Mohannad Seif**, each aiding the other and acting in concert, of the crime of **Money Laundering in the Third Degree** in violation of **Penal Law § 470.10(2)(b)(i)**, in that on or about March 6, 2013, in the County of Kings, knowing that one or more monetary instruments represented the proceeds of criminal conduct, the defendants transported,

transmitted, or transferred, or attempted to transport, transmit or transfer, on one or more occasions, monetary instruments which in fact represented the proceeds of specified criminal conduct, as that term is defined in Article 470 of the Penal Law, from a place in any county in this state to or through a place outside that county or to a place in any county in this state from or through a place outside that county, with intent to promote the carrying on of criminal conduct, and the total value of such monetary instrument or instruments exceeded fifty thousand dollars.

COUNT TWO HUNDRED-THREE

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Issa Sulieman, Ahmad Abdelaziz, a.k.a. Al Jaba'I, Ribhi Awawdeh, Mohamed Abed Alabed Awawdeh, a.k.a. Abu Samir, Muaffaq Askar and Mohannad Seif, each aiding the other and acting in concert, of the crime of Money Laundering in the Third Degree in violation of Penal Law § 470.10(1)(b)(i)(A), in that on or about March 6, 2013, in the County of Kings, knowing that the property involved in one or more financial transactions represented the proceeds of criminal conduct, the defendants conducted one or more such financial transactions which in fact involved the proceeds of specified criminal conduct, as that term is defined under Article 470 of the Penal Law, with intent to promote the carrying on of criminal conduct, and the total value involved in such financial transaction or transactions exceeded fifty thousand dollars.

COUNT TWO HUNDRED-FOUR

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants **Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Bassam Twam, Murad Bishrat and Mohannad Seif**, each aiding the other and acting in concert, of the crime of **Attempt to Evade or Defeat Cigarette and Tobacco Products Tax** in violation of **N.Y. Tax L. §481(2)(a) & 4** and **N.Y. Tax L. § 1814(a)(i)**, in that on or about September 22, 2012, in the County of Kings, did willfully attempt in any manner to evade or defeat the taxes imposed pursuant to New York State Tax Law or payment thereof on ten thousand (10,000) or more cigarettes.

COUNT TWO HUNDRED-FIVE

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants **Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Bassam Twam, Murad Bishrat and Mohannad Seif**, each aiding the other and acting in concert, of the crime of **Possession or Transport for the Purpose of Sale, or Sale or Offering For Sale, of Thirty Thousand or More Cigarettes in Unstamped or Unlawfully Stamped Packages** in violation of **N.Y. Tax L. §481(2)(a) & 4** and **N.Y. Tax L. § 1814(c)(2)**, in that on or about September 22, 2012, in the County of Kings, not being agents licensed by the Commissioner of the New York State Department of Taxation and Finance, did willfully possess or transport for the purpose of sale, thirty thousand (30,000) or more cigarettes subject to the tax imposed pursuant to New York

State Law in any unstamped or unlawfully stamped packages, and/or willfully sold or offered for sale thirty thousand (30,000) or more cigarettes in any unstamped or unlawfully stamped packages.

COUNT TWO HUNDRED-SIX

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Bassam Twam, Murad Bishrat and Mohannad Seif, each aiding the other and acting in concert, of the crime of Money Laundering in the Fourth Degree in violation of Penal Law § 470.05(2)(a)(i), in that on or about September 22, 2012, in the County of Kings, knowing that one or more monetary instruments represented the proceeds of criminal conduct, the defendants transported, transmitted, or transferred, on one or more occasions, monetary instruments which in fact represented the proceeds of specified criminal conduct, as that term is defined in Article 470 of the Penal Law, with intent to promote the carrying on of criminal conduct, and the total value of such monetary instrument or instruments exceeded ten thousand dollars.

COUNT TWO HUNDRED-SEVEN

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Bassam Twam, Murad Bishrat and Mohannad Seif, each aiding the other and acting in concert, of the crime of Money Laundering in the Fourth Degree in violation of Penal Law § 470.05(1)(a)(i)(A), in that on or about September 22, 2012, in

the County of Kings, knowing that the property involved in one or more financial transactions represented the proceeds of criminal conduct, the defendants conducted one or more such financial transactions which in fact involved the proceeds of specified criminal conduct, as that term is defined under Article 470 of the Penal Law, with intent to promote the carrying on of criminal conduct, and the total value involved in such financial transaction or transactions exceeded five thousand dollars.

COUNT TWO HUNDRED-EIGHT

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Bassam Twam and Murad Bishrat, each aiding the other and acting in concert, of the crime of Attempt to Evade or Defeat Cigarette and Tobacco Products Tax in violation of N.Y. Tax L. §481(2)(a) & 4 and N.Y. Tax L. § 1814(a)(i), in that on or about and between September 28 and September 30, 2012, in the County of Kings, did willfully attempt in any manner to evade or defeat the taxes imposed pursuant to New York State Tax Law or payment thereof on ten thousand (10,000) or more cigarettes.

COUNT TWO HUNDRED-NINE

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Bassam Twam and Murad Bishrat, each aiding the other and acting in concert, of the crime of Possession or Transport for the Purpose of Sale, or Sale or Offering For Sale, of Thirty Thousand or More Cigarettes in Unstamped or

Unlawfully Stamped Packages in violation of **N.Y. Tax L. §481(2)(a) & 4** and **N.Y. Tax L. § 1814(c)(2)**, in that on or about and between September 28 and September 30, 2012, in the County of Kings, not being agents licensed by the Commissioner of the New York State Department of Taxation and Finance, did willfully possess or transport for the purpose of sale, thirty thousand (30,000) or more cigarettes subject to the tax imposed pursuant to New York State Law in any unstamped or unlawfully stamped packages, and/or willfully sold or offered for sale thirty thousand (30,000) or more cigarettes in any unstamped or unlawfully stamped packages.

COUNT TWO HUNDRED-TEN

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Bassam Twam and Murad Bishrat, each aiding the other and acting in concert, of the crime of Money Laundering in the Third Degree in violation of **Penal Law § 470.10(2)(b)(i)**, in that on or about and between September 28 and September 30, 2012, in the County of Kings, knowing that one or more monetary instruments represented the proceeds of criminal conduct, the defendants transported, transmitted, or transferred, or attempted to transport, transmit or transfer, on one or more occasions, monetary instruments which in fact represented the proceeds of specified criminal conduct, as that term is defined in Article 470 of the Penal Law, from a place in any county in this state to or through a place outside that county or to a place in any county in this state from or through a place outside that county, with intent to promote the carrying

on of criminal conduct, and the total value of such monetary instrument or instruments exceeded fifty thousand dollars.

COUNT TWO HUNDRED-ELEVEN

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Bassam Twam and Murad Bishrat, each aiding the other and acting in concert, of the crime of Money Laundering in the Third Degree in violation of Penal Law § 470.10(1)(b)(i)(A), in that on or about and between September 28 and September 30, 2012, in the County of Kings, knowing that the property involved in one or more financial transactions represented the proceeds of criminal conduct, the defendants conducted one or more such financial transactions which in fact involved the proceeds of specified criminal conduct, as that term is defined under Article 470 of the Penal Law, with intent to promote the carrying on of criminal conduct, and the total value involved in such financial transaction or transactions exceeded fifty thousand dollars.

COUNT TWO HUNDRED-TWELVE

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Bassam Twam and Murad Bishrat, each aiding the other and acting in concert, of the crime of Attempt to Evade or Defeat Cigarette and Tobacco Products Tax in violation of N.Y. Tax L. §481(2)(a) & 4 and N.Y. Tax L. § 1814(a)(i), in that on or about and between October 1 and October 6, 2012, in the County of Kings, did

willfully attempt in any manner to evade or defeat the taxes imposed pursuant to New York State Tax Law or payment thereof on ten thousand (10,000) or more cigarettes.

COUNT TWO HUNDRED-THIRTEEN

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Bassam Twam and Murad Bishrat, each aiding the other and acting in concert, of the crime of Possession or Transport for the Purpose of Sale, or Sale or Offering For Sale, of Thirty Thousand or More Cigarettes in Unstamped or Unlawfully Stamped Packages in violation of N.Y. Tax L. §481(2)(a) & 4 and N.Y. Tax L. § 1814(c)(2), in that on or about and between October 1 and October 6, 2012, in the County of Kings, not being agents licensed by the Commissioner of the New York State Department of Taxation and Finance, did willfully possess or transport for the purpose of sale, thirty thousand (30,000) or more cigarettes subject to the tax imposed pursuant to New York State Law in any unstamped or unlawfully stamped packages, and/or willfully sold or offered for sale thirty thousand (30,000) or more cigarettes in any unstamped or unlawfully stamped packages.

COUNT TWO HUNDRED-FOURTEEN

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Bassam Twam and Murad Bishrat, each aiding the other and acting in concert, of the crime of Money Laundering in the Third Degree in violation of Penal

Law § 470.10(2)(b)(i), in that on or about and between October 1 and October 6, 2012, in the County of Kings, knowing that one or more monetary instruments represented the proceeds of criminal conduct, the defendants transported, transmitted, or transferred, or attempted to transport, transmit or transfer, on one or more occasions, monetary instruments which in fact represented the proceeds of specified criminal conduct, as that term is defined in Article 470 of the Penal Law, from a place in any county in this state to or through a place outside that county or to a place in any county in this state from or through a place outside that county, with intent to promote the carrying on of criminal conduct, and the total value of such monetary instrument or instruments exceeded fifty thousand dollars.

COUNT TWO HUNDRED-FIFTEEN

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Bassam Twam and Murad Bishrat, each aiding the other and acting in concert, of the crime of Money Laundering in the Third Degree in violation of Penal Law § 470.10(1)(b)(i)(A), in that on or about and between October 1 and October 6, 2012, in the County of Kings, knowing that the property involved in one or more financial transactions represented the proceeds of criminal conduct, the defendants conducted one or more such financial transactions which in fact involved the proceeds of specified criminal conduct, as that term is defined under Article 470 of the Penal Law, with intent to promote the carrying on of criminal conduct, and the total value involved in such financial transaction or transactions exceeded fifty thousand dollars.

COUNT TWO HUNDRED-SIXTEEN

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Ribhi Awawdeh, Mohamed Abed Alabed Awawdeh, a.k.a. Abu Samir, Yousseff Odeh, a.k.a. Abu Mahmoud, Issa Sulieman and Mohannad Seif, each aiding the other and acting in concert, of the crime of Attempt to Evade or Defeat Cigarette and Tobacco Products Tax in violation of N.Y. Tax L. §481(2)(a) & 4 and N.Y. Tax L. § 1814(a)(i), in that on or about and between December 21 and December 22, 2012, in the County of Kings, did willfully attempt in any manner to evade or defeat the taxes imposed pursuant to New York State Tax Law or payment thereof on ten thousand (10,000) or more cigarettes.

COUNT TWO HUNDRED-SEVENTEEN

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Ribhi Awawdeh, Mohamed Abed Alabed Awawdeh, a.k.a. Abu Samir, Yousseff Odeh, a.k.a. Abu Mahmoud, Issa Sulieman and Mohannad Seif, each aiding the other and acting in concert, of the crime of Possession or Transport for the Purpose of Sale, or Sale or Offering For Sale, of Thirty Thousand or More Cigarettes in Unstamped or Unlawfully Stamped Packages in violation of N.Y. Tax L. §481(2)(a) & 4 and N.Y. Tax L. § 1814(c)(2), in that on or about and between December 21 and December 22, 2012, in the County of Kings, not being agents licensed by the Commissioner of the New York State Department of Taxation and Finance, did willfully possess or transport for the purpose of sale, thirty

thousand (30,000) or more cigarettes subject to the tax imposed pursuant to New York State Law in any unstamped or unlawfully stamped packages, and/or willfully sold or offered for sale thirty thousand (30,000) or more cigarettes in any unstamped or unlawfully stamped packages.

COUNT TWO HUNDRED-EIGHTEEN

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Ribhi Awawdeh, Mohamed Abed Alabed Awawdeh, a.k.a. Abu Samir, Yousseff Odeh, a.k.a. Abu Mahmoud, Issa Sulieman and Mohannad Seif, each aiding the other and acting in concert, of the crime of Money Laundering in the Third Degree in violation of Penal Law § 470.10(2)(b)(i), in that on or about and between December 21 and December 22, 2012, in the County of Kings, knowing that one or more monetary instruments represented the proceeds of criminal conduct, the defendants transported, transmitted, or transferred, or attempted to transport, transmit or transfer, on one or more occasions, monetary instruments which in fact represented the proceeds of specified criminal conduct, as that term is defined in Article 470 of the Penal Law, from a place in any county in this state to or through a place outside that county or to a place in any county in this state from or through a place outside that county, with intent to promote the carrying on of criminal conduct, and the total value of such monetary instrument or instruments exceeded fifty thousand dollars.

COUNT TWO HUNDRED-NINETEEN

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Ribhi Awawdeh, Mohamed Abed Alabed Awawdeh, a.k.a. Abu Samir, Yousseff Odeh, a.k.a. Abu Mahmoud, Issa Sulieman and Mohannad Seif, each aiding the other and acting in concert, of the crime of Money Laundering in the Third Degree in violation of Penal Law § 470.10(1)(b)(i)(A), in that on or about and between December 21 and December 22, 2012, in the County of Kings, knowing that the property involved in one or more financial transactions represented the proceeds of criminal conduct, the defendants conducted one or more such financial transactions which in fact involved the proceeds of specified criminal conduct, as that term is defined under Article 470 of the Penal Law, with intent to promote the carrying on of criminal conduct, and the total value involved in such financial transaction or transactions exceeded fifty thousand dollars.

COUNT TWO HUNDRED-TWENTY

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Issa Sulieman and Mohannad Seif, each aiding the other and acting in concert, of the crime of Attempt to Evade or Defeat Cigarette and Tobacco Products Tax in violation of N.Y. Tax L. §481(2)(a) & 4 and N.Y. Tax L. § 1814(a)(i), in that on or about and between December 29, 2012 and January 3, 2013, in the County of Kings, did willfully attempt in any manner to evade or defeat the taxes imposed pursuant

to New York State Tax Law or payment thereof on ten thousand (10,000) or more cigarettes.

COUNT TWO HUNDRED TWENTY-ONE

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Issa Sulieman and Mohannad Seif, each aiding the other and acting in concert, of the crime of Possession or Transport for the Purpose of Sale, or Sale or Offering For Sale, of Thirty Thousand or More Cigarettes in Unstamped or Unlawfully Stamped Packages in violation of N.Y. Tax L. §481(2)(a) & 4 and N.Y. Tax L. § 1814(c)(2), in that on or about and between December 29, 2012 and January 3, 2013, in the County of Kings, not being agents licensed by the Commissioner of the New York State Department of Taxation and Finance, did willfully possess or transport for the purpose of sale, thirty thousand (30,000) or more cigarettes subject to the tax imposed pursuant to New York State Law in any unstamped or unlawfully stamped packages, and/or willfully sold or offered for sale thirty thousand (30,000) or more cigarettes in any unstamped or unlawfully stamped packages.

COUNT TWO HUNDRED TWENTY-TWO

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Issa Sulieman and Mohannad Seif, each aiding the other and acting in concert, of the crime of Money Laundering in the Third Degree in violation of Penal

Law § 470.10(2)(b)(i), in that on or about and between December 29, 2012 and January 3, 2013, in the County of Kings, knowing that one or more monetary instruments represented the proceeds of criminal conduct, the defendants transported, transmitted, or transferred, or attempted to transport, transmit or transfer, on one or more occasions, monetary instruments which in fact represented the proceeds of specified criminal conduct, as that term is defined in Article 470 of the Penal Law, from a place in any county in this state to or through a place outside that county or to a place in any county in this state from or through a place outside that county, with intent to promote the carrying on of criminal conduct, and the total value of such monetary instrument or instruments exceeded fifty thousand dollars.

COUNT TWO-HUNDRED TWENTY-THREE

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Issa Sulieman and Mohannad Seif, each aiding the other and acting in concert, of the crime of Money Laundering in the Third Degree in violation of Penal Law § 470.10(1)(b)(i)(A), in that on or about and between December 29, 2012 and January 3, 2013, in the County of Kings, knowing that the property involved in one or more financial transactions represented the proceeds of criminal conduct, the defendants conducted one or more such financial transactions which in fact involved the proceeds of specified criminal conduct, as that term is defined under Article 470 of the Penal Law, with intent to promote the carrying on of criminal conduct, and the total value involved in such financial transaction or transactions exceeded fifty thousand dollars.

COUNT TWO HUNDRED TWENTY-FOUR

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Issa Sulieman and Mohannad Seif, each aiding the other and acting in concert, of the crime of Attempt to Evade or Defeat Cigarette and Tobacco Products Tax in violation of N.Y. Tax L. §481(2)(a) & 4 and N.Y. Tax L. § 1814(a)(i), in that on or about and between January 13 and January 14, 2013, in the County of Kings, did willfully attempt in any manner to evade or defeat the taxes imposed pursuant to New York State Tax Law or payment thereof on ten thousand (10,000) or more cigarettes.

COUNT TWO HUNDRED TWENTY-FIVE

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Issa Sulieman and Mohannad Seif, each aiding the other and acting in concert, of the crime of Possession or Transport for the Purpose of Sale, or Sale or Offering For Sale, of Thirty Thousand or More Cigarettes in Unstamped or Unlawfully Stamped Packages in violation of N.Y. Tax L. §481(2)(a) & 4 and N.Y. Tax L. § 1814(c)(2), in that on or about and between January 13 and January 14, 2013, in the County of Kings, not being agents licensed by the Commissioner of the New York State Department of Taxation and Finance, did willfully possess or transport for the purpose of sale, thirty thousand (30,000) or more cigarettes subject to the tax imposed pursuant to New York State Law in any unstamped or unlawfully stamped packages,

and/or willfully sold or offered for sale thirty thousand (30,000) or more cigarettes in any unstamped or unlawfully stamped packages.

COUNT TWO HUNDRED TWENTY-SIX

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Issa Sulieman and Mohannad Seif, each aiding the other and acting in concert, of the crime of Money Laundering in the Third Degree in violation of Penal Law § 470.10(2)(b)(i), in that on or about and between January 13 and January 14, 2013, in the County of Kings, knowing that one or more monetary instruments represented the proceeds of criminal conduct, the defendants transported, transmitted, or transferred, or attempted to transport, transmit or transfer, on one or more occasions, monetary instruments which in fact represented the proceeds of specified criminal conduct, as that term is defined in Article 470 of the Penal Law, from a place in any county in this state to or through a place outside that county or to a place in any county in this state from or through a place outside that county, with intent to promote the carrying on of criminal conduct, and the total value of such monetary instrument or instruments exceeded fifty thousand dollars.

COUNT TWO HUNDRED TWENTY-SEVEN

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Issa Sulieman and Mohannad Seif, each aiding the other and acting in

concert, of the crime of **Money Laundering in the Third Degree** in violation of **Penal Law § 470.10(1)(b)(i)(A)**, in that on or about and between January 13 and January 14, 2013, in the County of Kings, knowing that the property involved in one or more financial transactions represented the proceeds of criminal conduct, the defendants conducted one or more such financial transactions which in fact involved the proceeds of specified criminal conduct, as that term is defined under Article 470 of the Penal Law, with intent to promote the carrying on of criminal conduct, and the total value involved in such financial transaction or transactions exceeded fifty thousand dollars.

COUNT TWO HUNDRED TWENTY-EIGHT

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Issa Sulieman, Ribhi Awawdeh, Mohamed Abed Alabed Awawdeh, a.k.a. Abu Samir and Mohannad Seif, each aiding the other and acting in concert, of the crime of Attempt to Evade or Defeat Cigarette and Tobacco Products Tax in violation of **N.Y. Tax L. §481(2)(a) & 4 and N.Y. Tax L. § 1814(a)(i)**, in that on or about and between January 22 and January 24, 2013, in the County of Kings, did willfully attempt in any manner to evade or defeat the taxes imposed pursuant to New York State Tax Law or payment thereof on ten thousand (10,000) or more cigarettes.

COUNT TWO HUNDRED TWENTY-NINE

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu

Mahmoud, Issa Sulieman, Ribhi Awawdeh, Mohamed Abed Alabed Awawdeh, a.k.a. Abu Samir and Mohannad Seif, each aiding the other and acting in concert, of the crime of **Possession or Transport for the Purpose of Sale, or Sale or Offering For Sale, of Thirty Thousand or More Cigarettes in Unstamped or Unlawfully Stamped Packages** in violation of **N.Y. Tax L. §481(2)(a) & 4** and **N.Y. Tax L. § 1814(c)(2)**, in that on or about and between January 22 and January 24, 2013, in the County of Kings, not being agents licensed by the Commissioner of the New York State Department of Taxation and Finance, did willfully possess or transport for the purpose of sale, thirty thousand (30,000) or more cigarettes subject to the tax imposed pursuant to New York State Law in any unstamped or unlawfully stamped packages, and/or willfully sold or offered for sale thirty thousand (30,000) or more cigarettes in any unstamped or unlawfully stamped packages.

COUNT TWO HUNDRED THIRTY

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants **Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Issa Sulieman, Ribhi Awawdeh, Mohamed Abed Alabed Awawdeh, a.k.a. Abu Samir and Mohannad Seif**, each aiding the other and acting in concert, of the crime of **Money Laundering in the Third Degree** in violation of **Penal Law § 470.10(2)(b)(i)**, in that on or about and between January 22 and January 24, 2013, in the County of Kings, knowing that one or more monetary instruments represented the proceeds of criminal conduct, the defendants transported, transmitted, or transferred, or attempted to transport, transmit or transfer, on one or more occasions, monetary

instruments which in fact represented the proceeds of specified criminal conduct, as that term is defined in Article 470 of the Penal Law, from a place in any county in this state to or through a place outside that county or to a place in any county in this state from or through a place outside that county, with intent to promote the carrying on of criminal conduct, and the total value of such monetary instrument or instruments exceeded fifty thousand dollars.

COUNT TWO HUNDRED THIRTY-ONE

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Issa Sulieman, Ribhi Awawdeh, Mohamed Abed Alabed Awawdeh, a.k.a. Abu Samir and Mohannad Seif, each aiding the other and acting in concert, of the crime of Money Laundering in the Third Degree in violation of Penal Law § 470.10(1)(b)(i)(A), in that on or about and between January 22 and January 24, 2013, in the County of Kings, knowing that the property involved in one or more financial transactions represented the proceeds of criminal conduct, the defendants conducted one or more such financial transactions which in fact involved the proceeds of specified criminal conduct, as that term is defined under Article 470 of the Penal Law, with intent to promote the carrying on of criminal conduct, and the total value involved in such financial transaction or transactions exceeded fifty thousand dollars.

COUNT TWO HUNDRED THIRTY-TWO

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a.

Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Issa Sulieman and Mohannad Seif, each aiding the other and acting in concert, of the crime of **Attempt to Evade or Defeat Cigarette and Tobacco Products Tax** in violation of **N.Y. Tax L. §481(2)(a) & 4** and **N.Y. Tax L. § 1814(a)(i)**, in that on or about and between January 26 and January 30, 2013, in the County of Kings, did willfully attempt in any manner to evade or defeat the taxes imposed pursuant to New York State Tax Law or payment thereof on ten thousand (10,000) or more cigarettes.

COUNT TWO-HUNDRED THIRTY-THREE

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Issa Sulieman and Mohannad Seif, each aiding the other and acting in concert, of the crime of **Possession or Transport for the Purpose of Sale, or Sale or Offering For Sale, of Thirty Thousand or More Cigarettes in Unstamped or Unlawfully Stamped Packages** in violation of **N.Y. Tax L. §481(2)(a) & 4** and **N.Y. Tax L. § 1814(c)(2)**, in that on or about and between January 26 and January 30, 2013, in the County of Kings, not being agents licensed by the Commissioner of the New York State Department of Taxation and Finance, did willfully possess or transport for the purpose of sale, thirty thousand (30,000) or more cigarettes subject to the tax imposed pursuant to New York State Law in any unstamped or unlawfully stamped packages, and/or willfully sold or offered for sale thirty thousand (30,000) or more cigarettes in any unstamped or unlawfully stamped packages.

COUNT TWO HUNDRED THIRTY-FOUR

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Issa Sulieman and Mohannad Seif, each aiding the other and acting in concert, of the crime of Money Laundering in the Third Degree in violation of Penal Law § 470.10(2)(b)(i), in that on or about and between January 26 and January 30, 2013, in the County of Kings, knowing that one or more monetary instruments represented the proceeds of criminal conduct, the defendants transported, transmitted, or transferred, or attempted to transport, transmit or transfer, on one or more occasions, monetary instruments which in fact represented the proceeds of specified criminal conduct, as that term is defined in Article 470 of the Penal Law, from a place in any county in this state to or through a place outside that county or to a place in any county in this state from or through a place outside that county, with intent to promote the carrying on of criminal conduct, and the total value of such monetary instrument or instruments exceeded fifty thousand dollars.

COUNT TWO HUNDRED THIRTY-FIVE

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Issa Sulieman and Mohannad Seif, each aiding the other and acting in concert, of the crime of Money Laundering in the Third Degree in violation of Penal Law § 470.10(1)(b)(i)(A), in that on or about and between January 26 and January 30,

2013, in the County of Kings, knowing that the property involved in one or more financial transactions represented the proceeds of criminal conduct, the defendants conducted one or more such financial transactions which in fact involved the proceeds of specified criminal conduct, as that term is defined under Article 470 of the Penal Law, with intent to promote the carrying on of criminal conduct, and the total value involved in such financial transaction or transactions exceeded fifty thousand dollars.

COUNT TWO HUNDRED THIRTY-SIX

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud and Mohannad Seif, each aiding the other and acting in concert, of the crime of Attempt to Evade or Defeat Cigarette and Tobacco Products Tax in violation of N.Y. Tax L. §481(2)(a) & 4 and N.Y. Tax L. § 1814(a)(i), in that on or about April 7, 2013, in the County of Kings, did willfully attempt in any manner to evade or defeat the taxes imposed pursuant to New York State Tax Law or payment thereof on ten thousand (10,000) or more cigarettes.

COUNT TWO HUNDRED THIRTY-SEVEN

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud and Mohannad Seif, each aiding the other and acting in concert, of the crime of Possession or Transport for the Purpose of Sale, or Sale or Offering For Sale, of Thirty Thousand or More Cigarettes in Unstamped or Unlawfully Stamped

Packages in violation of **N.Y. Tax L. §481(2)(a) & 4** and **N.Y. Tax L. § 1814(c)(2)**, in that on or about April 7, 2013, in the County of Kings, not being agents licensed by the Commissioner of the New York State Department of Taxation and Finance, did willfully possess or transport for the purpose of sale, thirty thousand (30,000) or more cigarettes subject to the tax imposed pursuant to New York State Law in any unstamped or unlawfully stamped packages, and/or willfully sold or offered for sale thirty thousand (30,000) or more cigarettes in any unstamped or unlawfully stamped packages.

COUNT TWO HUNDRED THIRTY-EIGHT

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Issa Sulieman, Ribhi Awawdeh, Mohamed Abed Alabed Awawdeh, a.k.a. Abu Samir, Bassam Twam, Ahmad Abdelaziz, a.k.a. Al Jaba'I and Mohannad Seif, each aiding the other and acting in concert, of the crime of Attempt to Evade or Defeat Cigarette and Tobacco Products Tax in violation of **N.Y. Tax L. §481(2)(a) & 4** and **N.Y. Tax L. § 1814(a)(i)**, in that on or about and between March 22 and March 23, 2013, in the County of Kings, did willfully attempt in any manner to evade or defeat the taxes imposed pursuant to New York State Tax Law or payment thereof on ten thousand (10,000) or more cigarettes.

COUNT TWO HUNDRED THIRTY-NINE

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu

Mahmoud, Issa Sulieman, Ribhi Awawdeh, Mohamed Abed Alabed Awawdeh, a.k.a. Abu Samir, Bassam Twam, Ahmad Abdelaziz, a.k.a. Al Jaba'I and Mohannad Seif, each aiding the other and acting in concert, of the crime of **Possession or Transport for the Purpose of Sale, or Sale or Offering For Sale, of Thirty Thousand or More Cigarettes in Unstamped or Unlawfully Stamped Packages** in violation of **N.Y. Tax L. §481(2)(a) & 4 and N.Y. Tax L. § 1814(c)(2)**, in that on or about and between March 22 and March 23, 2013, between in the County of Kings, not being agents licensed by the Commissioner of the New York State Department of Taxation and Finance, did willfully possess or transport for the purpose of sale, thirty thousand (30,000) or more cigarettes subject to the tax imposed pursuant to New York State Law in any unstamped or unlawfully stamped packages, and/or willfully sold or offered for sale thirty thousand (30,000) or more cigarettes in any unstamped or unlawfully stamped packages.

COUNT TWO HUNDRED FORTY

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants **Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Issa Sulieman, Ribhi Awawdeh, Mohamed Abed Alabed Awawdeh, a.k.a. Abu Samir, Bassam Twam, Ahmad Abdelaziz, a.k.a. Al Jaba'I and Mohannad Seif**, each aiding the other and acting in concert, of the crime of **Money Laundering in the Third Degree** in violation of **Penal Law § 470.10(2)(b)(i)**, in that on or about and between March 22 and March 23, 2013, in the County of Kings, knowing that one or more monetary instruments represented the proceeds of criminal conduct, the defendants

transported, transmitted, or transferred, or attempted to transport, transmit or transfer, on one or more occasions, monetary instruments which in fact represented the proceeds of specified criminal conduct, as that term is defined in Article 470 of the Penal Law, from a place in any county in this state to or through a place outside that county or to a place in any county in this state from or through a place outside that county, with intent to promote the carrying on of criminal conduct, and the total value of such monetary instrument or instruments exceeded fifty thousand dollars.

COUNT TWO HUNDRED FORTY-ONE

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Issa Sulieman, Ribhi Awawdeh, Mohamed Abed Alabed Awawdeh, a.k.a. Abu Samir, Bassam Twam, Ahmad Abdelaziz, a.k.a. Al Jaba'I and Mohannad Seif, each aiding the other and acting in concert, of the crime of Money Laundering in the Third Degree in violation of Penal Law § 470.10(1)(b)(i)(A), in that on or about and between March 22 and March 23, 2013, in the County of Kings, knowing that the property involved in one or more financial transactions represented the proceeds of criminal conduct, the defendants conducted one or more such financial transactions which in fact involved the proceeds of specified criminal conduct, as that term is defined under Article 470 of the Penal Law, with intent to promote the carrying on of criminal conduct, and the total value involved in such financial transaction or transactions exceeded fifty thousand dollars.

COUNT TWO HUNDRED FORTY-TWO

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah and Samer Ramadan, a.k.a. Abu Mahdy, each aiding the other and acting in concert, of the crime of Money Laundering in the Second Degree in violation of **Penal Law § 470.15(1)(b)(ii)(A)**, in that on or about and between September 2011 and December 2012, in the County of Kings, knowing that the property involved in one or more financial transactions represented the proceeds of specified criminal conduct, the defendants conducted one or more such financial transactions which in fact involved the proceeds of specified criminal conduct, as that term is defined under Article 470 of the Penal Law, knowing that the transaction or transactions in whole or in part are designed to conceal or disguise the nature, location, the source, the ownership or control of the proceeds of specified criminal conduct, as that term is defined under Article 470 of the Penal Law, and the total value involved in such financial transaction or transactions exceeded one hundred thousand dollars.

COUNT TWO HUNDRED FORTY-THREE

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah and Samer Ramadan, a.k.a. Abu Mahdy, each aiding the other and acting in concert, of the crime of Money Laundering in the Second Degree in violation of **Penal Law § 470.15(1)(b)(i)(A)**, in that on or about and between September 2011 and December 2012, in the County of Kings, knowing that the property involved in one or more financial transactions represented the proceeds of specified criminal conduct, the defendants conducted one or

more such financial transactions which in fact involved the proceeds of specified criminal conduct, as that term is defined under Article 470 of the Penal Law, with intent to promote the carrying on of specified criminal conduct, and the total value involved in such financial transaction or transactions exceeded one hundred thousand dollars.

COUNT TWO HUNDRED FORTY-FOUR

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, Samer Ramadan, a.k.a. Abu Mahdy, Adela Buzahrieh, a.k.a. Adel Abu Zahrieh, Yousseff Odeh, a.k.a. Abu Mahmoud, Issa Sulieman, Mufeed Attal, a.k.a. Abu Saleem, Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali, Munther Mahmoud, Nabil Saad Badr, a.k.a. Abu Nabil, Ahmad Abdelaziz, a.k.a. Al Jaba'I, Ribhi Awawdeh, Mohamed Abed Alabed Awawdeh, a.k.a. Abu Samir, Bassam Twam, Murad Bishrat, Mohannad Seif, Muaffaq Askar, each aiding the other and acting in concert with each other and others known and unknown to the Grand Jury, committed the crime of Conspiracy in the fifth degree in violation of Penal Law Section 105.05(1), committed as follows:

The defendants, from on or about and between September 2011 and May 10, 2013, in **Kings County, Bronx County** and elsewhere within the State of New York and the States of Delaware, Maryland and New Jersey, with intent that conduct constituting a felony be performed, to wit: **Attempt to Evade or Defeat Cigarette and Tobacco Products Tax** in violation of **N.Y. Tax L. §481(2)(a) & 4** and **N.Y. Tax L. § 1814(a)(i)**, agreed with one or more persons to engage in or cause the performance of such conduct.

PREAMBLE

During the course of the above-described conspiracy it was the goal of its members to promote and profit from the Ramadan untaxed cigarette distribution-based money laundering enterprise (hereinafter "the business"). Basel Ramadan and his brother Samer (collectively referred to as "the Ramadans") supplied their co-conspirators with hundreds of thousands of dollars worth of untaxed cigarettes for unauthorized resale and distribution in New York City, predominantly in Brooklyn, and elsewhere. The Ramadans directed the untaxed cigarette trafficking operation from the Ocean City, Maryland area, and employed distributors in the New York City area, consisting of **Youssef Odeh**, a.k.a. Abu Mahmoud (hereinafter "**Odeh**"), **Issa Sulliemman** (hereinafter "**Issa**"); **Ribhi Awawdeh** (hereinafter "**Ribhi**"), **Mohamed Abed Alabed Awawdeh**, a.k.a. Abu Samir (hereinafter "**Mohamed Abed**")(collectively these two are referred to as "the Dibwani" or "The Bronx Guys"); **Ahmad Abdelaziz**, a.k.a. Al Jaba'I (hereinafter "**Abdelaziz**"); **Mufeed Attal**, a.k.a. Abu Saleem (hereinafter "**Attal**") **Nimer Izzat**, a.k.a. Izzat Nimer, a.k.a., Abu Ali (hereinafter "**Nimer**"); **Munther Mahmoud** (hereinafter "**Munther**") and **Saad Badr Nabil**, a.k.a. Abu Nabil (hereinafter "**Nabil**"), all of whom purchased untaxed cigarettes from the Ramadans. In turn, the distributors sold the untaxed cigaretted within New York City (predominantly in Brooklyn) to selected resellers **Bassam Twam** (hereinafter "**Bassam**"), **Mohannad Seif** (hereinafter "**Seif**"), **Murad Bishrat** (hereinafter "**Murad**"), and **Muaffaq Askar** (hereinafter "**Askar**"), who would resell the untaxed cigarettes to consumers. **Adel Abuzarieh** (hereinafter "**Adel**") transported the cash proceeds from the cigarette sales, sometimes over \$100,000 per trip, from the New York City-based distributors back to the

Ramadans and transported the untaxed cigarettes from the Ramadans to the New York based distributors for sale.

It was the common criminal purpose of the conspiracy to profit from the business by generating large amounts of cash profits and to launder illicit proceeds in order to promote and carrying on evading and defeating New York State's Cigarette and Tobacco Products Tax and to conceal and disguise the nature and origin of the illicit proceeds, thereby allowing the business to continue its operations and reap the financial benefits of the criminal conduct without detection by law enforcement. The defendants accomplished this goal by reinvesting some of the millions dollars of money generated from the sale and distribution of untaxed cigarettes to further expand and generate additional profits from their illegal business.

OVERT ACTS

In furtherance of said conspiracy and to effect the objects thereof, and during the course thereof, the following overt acts, among others, were committed:

On October 23, 2012, **Mohannad Seif** and **Bassam Twam** had a telephone conversation in which Seif told Twam he was counting money for untaxed cigarettes.

On October 23, 2012, **Mohannad Seif** and **Bassam Twam** met and Twam gave Seif bags containing untaxed cigarettes.

On November 3, 2012, **Munther Mahmoud** and **Basel Ramadan, a.k.a. Abu Salah** had a telephone conversation in which Mahmoud discussed the balance of money he owed to Ramadan for untaxed cigarettes.

On November 3, 2012, **Saad Badr, a.k.a. Abu Nabil** and **Basel Ramadan, a.k.a. Abu Salah** had a telephone conversation in which Badr discussed the money he owed to

Ramadan for untaxed cigarettes, and Ramadan confirmed that Badr had just received over 30,000 untaxed cigarettes.

On December 26, 2012, **Mufeed Attal, a.k.a. Abu Saleem, and Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali,** had a telephone conversation in which Nimer advised Attal that he brought in excess of 30,000 untaxed cigarettes.

On Decemer 26, 2012, **Murad Bishrat** sent a text message to **Mufeed Attal, a.k.a. Abu Saleem,** that read: 118 Marlboro and 344 Newport.

On December 26, 2012, **Murad Bishrat** had a telephone conversation with **Mufeed Attal, a.k.a. Abu Saleem** to confirm Attal received his order for untaxed cigarettes.

On January 22, 2013, **Ribhi Awawdeh** and **Adela Buzahrieh, a.k.a. Adel Abu Zahrieh,** had a telephone conversation in which Ribhi Awawdeh stated he wanted to order 1000 cartons of untaxed cigarettes for himself and another 1000 cartons of untaxed cigarettes for his brother.

On February 1, 2013, **Basel Ramadan, a.k.a. Abu Salah** and **Yousseff Odeh, a.k.a. Abu Mahmoud,** had a telephone conversation in which Odeh ordered in excess of 30,000 untaxed cigarettes from Basel Ramadan.

On February 10, 2013, **Ahmad Abdelaziz, a.k.a. Al Jaba'I** and **Adela Buzahrieh, a.k.a. Adel Abu Zahrieh** had a telephone conversation in which Ahmad Abdelaziz told Adela Buzahrieh that he wanted to order 1800 cartons of untaxed cigarettes.

On March 6, 2013, **Mohamed Abed Alabed Awawdeh** and **Adela Buzahrieh, a.k.a. Adel Abu Zahrieh** met up and **Adel Abu Zahrieh** delivered untaxed cigarettes to Awawdeh.

On March 11, 2013, **Samer Ramadan, a.k.a. Abu Mahdy** and **Izzat Nimer, a.k.a. Nimer Izzat, a.k.a. Abu Ali** had a telephone conversation in which Nimer ordered in excess of 30,000 untaxed cigarettes from Samer Ramadan.

On March 15, 2013, **Muaffaq Askar** and **Issa Sulieman** had a telephone conversation in which Askar ordered a quantity of untaxed cigarettes from Sulieman.

On March 30, 2013, **Basel Ramadan, a.k.a. Abu Salah** was present at a storage facility located at Dagsboro, Delaware.

PERI ALYSE KADANOFF
Deputy Attorney General
Organized Crime Task Force

By _____
JONATHAN R. SENNETT
Assistant Deputy Attorney General

A TRUE BILL

GRAND JURY FOREPERSON
Dated: May 13, 2013