

United States District Court

EASTERN

DISTRICT OF

MICHIGAN

UNITED STATES OF AMERICA

CRIMINAL COMPLAINT

V.

CASE NUMBER: 04-30044

ALI ABDUL-KARIM FARHAT
a/k/a Allen Farhat

(Name and Address of Defendant)

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about December, 2003 in Wayne county, in the Eastern District of Michigan defendant(s) did, (Track Statutory Language of Offense)

did knowingly, intentionally, and unlawfully conspire and agree with various other persons to distribute cocaine, a controlled substance

in violation of Title 21 United States Code, Section(s) 841 and 846

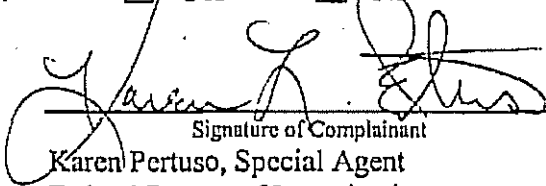
I further state that I am a(n) Special Agent and that this complaint is based on the following facts

(SEE ATTACHED AFFIDAVIT)

FILED
JUN 14 P 6:03
U.S. DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN

Continued on the attached sheet and made a part hereof:

Yes No



Signature of Complainant
Karen Pertuso, Special Agent
Federal Bureau of Investigation

Sworn to before me and subscribed in my presence,

1/14/04

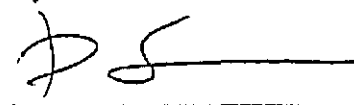
Date

at Detroit, Michigan

City and State

R. Steven Whalen

United States Magistrate Judge



Signature of Judicial Officer

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN

AFFIDAVIT IN SUPPORT OF COMPLAINT

Karen Pertuso, Special Agent, Federal Bureau of Investigation, Detroit, Michigan,
being duly sworn states:

1. I am a Special Agent of the Federal Bureau of Investigation (FBI) and have been so employed for more than eighteen years. I have extensive experience in the investigation of drug trafficking organizations. I have directed numerous drug trafficking investigations in my capacity as a case agent, and have utilized court ordered electronic surveillance techniques during these investigations. I also have worked closely with confidential informants who have extensive knowledge of the inner workings of drug trafficking organizations and consequently am aware of patterns, stratagems, and techniques of upper level members of drug trafficking organizations. I am presently assigned to the Detroit Field Office, specifically to the Joint Terrorism Task Force (JTTF). I am familiar with jargon used by drug traffickers, the manner in which they conduct business, their various means of communicating, and the type of physical evidence, such as notations regarding suppliers and customers, that they typically have at their residences or places of business.

2. I have participated in the investigation of the drug trafficking activities of an organization whose members include ORANDE LNU a/k/a "King O," ZULE OBAWAL-LAH SHULE, AI LNU, HASSAN ABDUL-KARIM FARHAT, and ALI ABDUL-KARIM FARHAT, a/k/a Allen Farhat. As part of that investigation on December 23,

2004, a court order, pursuant to 18 U.S.C. 2516, was issued for the interception of calls to and from a mobile telephone with the number (734)516-9469, utilized by ZULE OBAWALLAH SHULE. Many of the facts set forth in this affidavit are based on calls intercepted on that phone. As a result of my personal participation in this investigation, the calls intercepted in the court ordered wiretap, information provided by a reliable confidential informant, and information provided to me by other Special Agents of the FBI, I am familiar with all aspects of this investigation. On the basis of this familiarity, and on the basis of other information which I have reviewed and determined to be reliable, in light of my experience investigating drug traffickers, I allege the facts to show that there is probable cause to believe that ZULE OBAWALLAH SHULE, ALI LNU, ALI ABDUL-KARIM FARHAT, HASSAN ABDUL-KARIM FARHAT, ORANDE LNU, and FNU LNU a/k/a "Bull" have committed the following criminal offenses: distribution of a controlled substance (cocaine, heroin and marijuana) in violation of 21 U.S.C. 841 and conspiracy to distribute cocaine, heroin and marijuana in violation of 21 U.S.C. 846, as more fully detailed below.

3. A confidential informant (CI-1) has provided information to the F.B.I. for over five years. The information provided by CI-1 has been found to be reliable and credible because it has been corroborated through independent investigation. Information provided by CI-1 has been used in affidavits submitted in support of orders to intercept wire and oral communications, federal search warrants, and state search warrants, which have resulted in the seizure of contraband, including weapons and illegal drugs. In this investigation the information provided by CI-1 has been corroborated by conversations

intercepted pursuant to the court ordered wiretap.

4. In Feb. 2001, CI-1 observed ALI ABDUL-KARIM FARHAT and his brother, HASSAN ABDUL-KARIM FARHAT in possession of cocaine at Sigma Distribution Inc¹. CI-1 saw people packaging cocaine at the direction of the Farhats.

5. In October 2002, CI-1 met with ALI ABDUL-KARIM FARHAT, Mohammed El-Harake, and Mike Haidar. During this meeting Farhat and Haidar discussed their difficulties in organizing a shipment of marijuana. Farhat opined that, if these difficulties continued, they should remain focused on heroin distribution. Haidar stated that cocaine was easier to obtain and suggested they focus on obtaining and distributing cocaine.

6. During January 2003 ALI ABDUL-KARIM FARHAT informed CI-1 that he had supplied 14 kgs. of cocaine to Sean LNU. Farhat said that Sean LNU was a cousin of a person identified as Tyrone. Farhat described Tyrone as his partner in the distribution of kilogram quantities of heroin. Farhat furnished Sean LNU's telephone number to CI-1. (The subscriber for that telephone number is Cord Doss, who has been independently identified as a drug trafficker, having engaged in drug transactions with an undercover agent.)

7. In May 2003 ALI ABDUL-KARIM FARHAT called CI-1 and said that he wanted to introduce CI-1 to "his boy from Canada." A short time later Farhat introduced CI-1 to this person, who spoke with an accent which led CI-1 to believe this person was

¹ALI ABDUL-KARIM FARHAT is the owner of Sigma Distribution Inc., a fragrance importation /wholesale business, located at 24512 Michigan Avenue, Dearborn, Michigan. ALI ABDUL-KARIM FARHAT and HASSAN ABDUL-KARIM FARHAT are brothers who work together at Sigma and live together 7724 West Morrow Circle, Dearborn, Michigan.

from Nigeria. This person identified himself as Zule (ph). CI-1 later saw a Canadian immigration document in the possession of Zule. That document bore the name ZULE OBAWALLAH SHULE. Shule told CI-1 that he was involved in heroin trafficking with ALI ABDUL-KARIM FARHAT and that Farhat owed him \$120,000.

8. In May 2003 ZULE OBAWALLAH SHULE had several conversations with CI-1 about his relationship with ALI ABDUL-KARIM FARHAT. Shule said that he and ALI ABDUL-KARIM FARHAT were in the process of securing a warehouse in Windsor, Canada which they could use for the storage of illegal drugs.

9. During the summer of 2003, CI-1 had several conversations with ORANDE LNU, whom CI-1 met through ZULE OBAWALLAH SHULE. Among other things, Orande made the following statements:

A. He, Orande, has supplied Farhat with heroin for 10 years.

B. ALI ABDUL-KARIM FARHAT owed him \$40,000

C. CI-1 complained about the quality of heroin that he had previously received from ALI ABDUL-KARIM FARHAT,² and Farhat's refusal to meet with his, (CI-1) man (an F.B.I. undercover agent). Orande assured CI-1 that he and CI-1 would meet with Farhat, after which CI-1 would have no more problems with Farhat.

10. On May 11, 2003, ORANDE LNU told CI-1 that "his boss" wanted to meet with him. CI-1, Orande and others subsequently met with a person identified to him as "Papa." Through subsequent investigation, "Papa" has been identified as Leonicio

²Previously, CI-1 had purchased a quantity of poor quality heroin from ALI ABDUL-KARIM FARHAT.

Camargo. Camargo admitted the following to CI-1:

A. He had previously lived in Panama where he purchased cocaine for \$500/kg and shipped it to the to United States. He could not return to Panama because he had been implicated in a substantial seizure of cocaine there. The DEA had his picture but did not know his name.

B. He had imported large amounts of cocaine into the United States. C. He was willing to front two kgs. of cocaine to CI-1 for distribution in the Detroit area.

D. Luis LNU, one of his colleagues, wanted to fire "Allen" (ALI ABDUL-KARIM FARHAT) because Luis did not believe that Farhat was making all the drug trafficking money that he could in the Detroit metro area. Luis also complained that it took Farhat too long to pay for the drugs furnished to him.

11. CI-1 learned that "Papa" lives at 6607 Oakland, Riverdale, Maryland. Checking records, agents have determined that Leonicio Camargo is associated with this address. CI-1 was therefore shown a photograph of Leonicio Camargo, whom he identified as "Papa."

12. On or about May 29, 2003 CI-1 received a telephone call from ORANDE LNU. In that conversation, Orande told CI-1 that previous problems he experienced with ALI ABDUL-KARIM FARHAT (see above) would be resolved at a meeting with Farhat. Orande also said that Luis LNU (one of Orande's associates) had recently contacted Farhat, who told Luis that he would soon pay him the money owed to him. Luis relayed to Farhat the problems that had been previously expressed to ORANDE LNU by CI-1. i.e. problems in conducting heroin transactions with Farhat. Luis told Farhat that, if he

(Farhat) chose not to meet, they would no longer do business with him. Farhat responded that he did not want their drug trafficking relationship to end that everything could be resolved. Orande told CI-1 that, following the meeting with Farhat, CI-1 would no longer have difficulties introducing heroin customers to Farhat.

13. In June 2003 CI-1 was in the company of Al LNU and other drug traffickers for a significant period of time. On one occasion Al LNU told CI-1 that Ali Farhat owed the drug trafficking organization \$250,000.

14. On June 11, 2003 CI-1 was told by Luis LNU that two vehicles would arrive in Atlantic City, New Jersey that evening with the money owed the organization by "Allen" (ALI ABDUL-KARIM FARHAT). Following that conversation CI-1, Luis LNU, Al LNU and another person drove from the Washington, D.C. area to Atlantic City in two separate cars. They arrived in the Atlantic City area after midnight and met two men who gave Luis LNU two bags. These bags were then transported by two women to a house where ORANDE LNU took custody of the bags. At this house CI-1 saw the contents of the bags: a substantial amount of cash. ORANDE LNU and Luis counted the money and discovered that the bags contained \$185,000, instead of the \$250,000 that Farhat owed.

15. On June 14, 2003 FNU LNU a/k/a "Bull" a very large African man who works for Orande, in the company of CI-1, traveled to the Detroit area to emphasize to ALI ABDUL-KARIM FARHAT that Orande and Luis wanted the rest of the money that Farhat owed them. Bull and CI-1 went to the Palm Springs Restaurant in Dearborn, MI. This restaurant was owned at the time by Farhat. Although CI-1 was not present when

Bull met Farhat, Bull told CI-1 that Farhat was given instructions to meet with Luis. The meeting between Bull and Farhat was surveilled by JTTF members.

16. On October 28, 2003 ZULE OBAWALLAH SHULE unexpectedly arrived in metro Detroit and contacted CI-1. Shule was in possession of \$40,000 and a quantity of marijuana. Shule told CI-1 that ALI ABDUL-KARIM FARHAT had given him the money earlier that day in payment for drugs previously supplied by his organization to Farhat. At a later time Shule told CI-1 that the marijuana had been supplied by ALI ABDUL-KARIM FARHAT.

17. In the beginning of November, 2003, CI-1 and ZULE OBAWALLAH SHULE went to Atlantic City where they met with Al LNU, Enrique LNU and a Colombian male. They discussed setting up a drug distribution network in Detroit.

18. During the Summer and Fall of 2003 CI-1 became better acquainted with ZULE OBAWALLAH SHULE, ORANDE LNU, Leonicio Camargo and AL LNU. It appears that these drug dealers began to trust CI-1 and confided in him. CI-1 was told that their drug trafficking organization had contacts with international suppliers of heroin and cocaine. They had developed a distribution network that included New York, New Jersey, Maryland, Pennsylvania, Michigan, Ohio, Illinois, Arkansas, and California.

19. On November 5, 2003, an F.B.I. undercover agent [UCA-1] had a telephone conversation with CI-1, who was referred to as "Big Man" and ZULE OBAWALLAH SHULE. CI-1 and Shule were in the same location; thus, UCA-1 would talk alternatively with both of them. During this call CI-1 said, "We got a proposition for you." CI-1 then

said that he had to talk with Shule for a minute, after which he would call back. In that subsequent phone call UCA-1 asked CI-1 whether they (CI-1 and Shule) were talking about "raw" (heroin). CI-1 responded affirmatively. Asked about the price, CI-1 said that Shule was doing the "whole keys" (kilograms) for 130 (\$130,000) and halves for 65. UCA-1 expressed his concern that the amount of heroin in the proposed deal was large. Shule responded that UCA-1 should meet with him and they would talk and "work something out." Shule also talked about his drug associate in the Detroit area, whom he called Ali, a Muslim, who lived in Dearborn. (From this and other references to "Ali" below as well as calls that Shule made to Sigma, it is clear that Shule was referring to ALI ABDUL-KARIM FARHAT.)

20. On November 7, 2003, CI-1 drove ZULE OBAWALLAH SHULE and Leonicio Camargo a/k/a "Papa" from Maryland to New York. That day they met a person identified as "Easy" who agreed to transport 3 kgs. of heroin to Detroit to be sold to ALI ABDUL-KARIM FARHAT.

21. On November 7, 2003, CI-1, ZULE OBAWALLAH SHULE, and Leonicio Camargo a/k/a "Papa" met Shule's source of supply for heroin, who was identified as "Melc." "Mele" agreed to supply Shule with 3 kgs of heroin which were to be transported to Detroit. After meeting with "Mele," they went to another location where Shule picked up \$175,000, which he later that day delivered to "Melc."

22. On November 10, 2003, UCA-1 bought approximately 55 gms. of heroin for \$8,000 from ZULE OBAWALLAH SHULE. Shule said that he was expecting a larger

quantity of heroin and would supply UCA-1. Another undercover agent [UCA-2] was present during this transaction and represented himself as a colleague (university professor) of UCA-1. During the course of this transaction, Shule stated that he intended to come to Michigan and give to UCA-1 the "pounds" that he owed him. (This referred to a three pound shortage of marijuana during a sale by Shule to UCA-1.) Also during this conversation, Shule advised that he would let the UCA(s) meet his "friend." Shule stated that the friend was an Arab with a fragrance store (Ali Farhat).³ A laboratory analysis of the package furnished by Shule confirmed the presence of heroin.

23. On November 13, 2003, UCA-2 received a call from ZULE OBAWALLAH SHULE in which they discussed a proposed heroin sale. During this conversation, the UCA and Shule made plans for a future meeting. The UCA asked Shule if he and Shule would hook up with Ali (Farhat). Shule responded in the affirmative.

24. On November 20, 2003, CI-1 and ZULE OBAWALLAH SHULE met with Al LNU who stated that he currently possessed 300 kg. of cocaine in the Baltimore area. They planned to ship this to Detroit.

25. On November 21, 2003, UCA-2 purchased approximately 80 grams of heroin from ZULE OBAWALLAH SHULE. During the course of this meeting, Shule said that he would not have his house until Monday.⁴ Shule stated that he would front a "key" (a

³Sigma Distribution Inc. deals in fragrances.

⁴CI-1 reported that Shule had been trying to locate a house in the Detroit metro area to use in his drug trafficking.

reference to one kilogram) to UCA-2 during a planned meeting with Ali (Farhat). Later in the meeting, Shule stated that he had the UCA's number and he would keep in contact. During the transaction, Shule told UCA-2 that he would introduce him to his partner in the Detroit area, whom he referred to as "Ali." They also discussed Ali's fragrance store in Dearborn.

26. On November 21, 2003, at various times throughout the day, in the presence of CI-1, Shule called ALI ABDUL-KARIM FARHAT about the rental or purchase of a house in Detroit. According to Shule, Farhat told him that it would take awhile to finalize a real estate deal. (Shule had previously told CI-1 that he intended to purchase a residence in the Detroit area to facilitate his drug trafficking.)

27. On November 22, 2003, CI-1 dropped ZULE OBAWALLAH SHULE off at a location in Detroit, where he was picked up by ALI ABDUL-KARIM FARHAT. Farhat and Shule then drove to a location in Royal Oak Township. At that location, Farhat, Shule and someone who appeared to be a real estate agent entered a house that had a "For Sale" sign on it.

28. On December 3, 2003, UCA-2 received three telephone calls from ZULE OBAWALLAH SHULE. In the first call, Shule offered to sell UCA-2 100 grams of heroin for \$11,000. UCA-2 told Shule to call back. In the second call, UCA-2 declined the heroin offer, stating that he had just purchased a quantity of marijuana. UCA-2 asked about the availability of crack cocaine. Shule said that he would check with his friend, to find out if he had any left.

29. On December 3, 2003, UCA-2 received a call from ZULE OBAWALLAH SHULE, who again pressed UCA-2 to buy 100 grams of heroin. UCA-2 declined.

30. On December 4, 2003, Shule told CI-1 that he had left the telephone number of "his man" on UCA-2's answering system; that he was at a certain location for about 10 more minutes and that UCA-2 should call him back within ten minutes at that number. UCA-2 then retrieved the message. The telephone number given to him by Shule was 617-3424. (This number has been determined to be the mobile phone number of ALI ABDUL-KARIM FARHAT.)

31. On Dec. 6, 2003, ZULE OBAWALLAH SHULE had a telephone conversation with UCA-2. During that conversation UCA-2 offered to provide Shule with a cell phone so that it could be used in conducting business. Shule was receptive to the idea.

32. On December 9, 2003, UCA-2 gave the following telephone to ZULE OBAWALLAH SHULE: a mobile telephone with the number (734)516-9469. During this meeting Shule stated that he talked to Ali and he was being patient. UCA-2 and Shule discussed Shule's efforts to purchase a residence. They also discussed ways to avoid detection by law enforcement.

33. On December 10, 2003, ZULE OBAWALLAH SHULE called UCA-2 and told him that while he was talking to Ali (Farhat) on the phone provided to him by UCA-2 the previous day ((734)516-9469), his telephone conversation was interrupted by text messages and that he then had to call Ali back. UCA-2 assured Shule that he would have the problem taken care of.

34. On Dec. 20, 2003 Leonicio Camargo aka "Papa" called CI-1 and told CI-1 to have Shule contact him (Camargo) as soon as possible because he had very good news from Miami. Camargo told CI-1 that Shule would know what he was talking about and that "we are big time now."

35. During the evening of Dec. 22, 2003 Leonicio Camargo telephoned CI-1 and told CI-1 that his cousin, "Manescu," had successfully imported 1300 kgs of cocaine into Miami by means of a vessel. Camargo again requested that CI-1 have ZULE OBAWALLAH SHULE call him, Camargo, as soon as possible. CI-1 later learned through conversation with Shule that the 1300 kilograms had been stolen from a Colombian trafficker that had previously cheated their drug trafficking organization.

36. During the early morning hours of Dec. 23, 2003, CI-1 reported that ZULE OBAWALLAH SHULE had recently come to his residence in the company of ALI ABDUL-KARIM FARHAT. Shule told CI-1 that one of Farhat's people wants two kgs. CI-1 observed this incident.

37. On December 23, 2003, UCA-2 contacted ZULE OBAWALLAH SHULE and told him that he was interested in purchasing a kg. of cocaine. Shule informed the UCA that he should bring the money to him (Shule) and that he (UCA) could then pick up the cocaine from Ali (Farhat).

38. On December 24, 2003 agents intercepted a telephone call from ZULE OBAWALLAH SHULE to Sigma Distribution Inc. (the Farhat business). There was no answer at Sigma. Shule left the following message: "Tony two. Tony two. I wait for

Larry." (In light of all the other evidence in this investigation, this conversation confirms the drug distribution method being used by Shule, Farhat and others during this time. Shule would be in contact with purchasers and would communicate to Farhat, who was in possession of the cocaine at the time.)

39. Agents intercepted another call on December 24, 2003 from ZULE OBAWALLAH SHULE to Sigma. Shule left the following message on the answering machine, "Hurry up. Hurry up. I have people. I have them pay for one. I have people with me. Hurry up please." (It is apparent that ZULE OBAWALLAH SHULE and ALI ABDUL-KARIM FARHAT were working together with Shule collecting money from buyers and Farhat distributing the cocaine. The "people" Shule is referring to is UCA-2.)

40. On December 24, 2003 agents intercepted a call from ZULE OBAWALLAH SHULE to UCA-2. Shule said everything was on for 7:00 p.m. "I just talked to Ali."

41. On December 24, 2003, UCA-2 met with ZULE OBAWALLAH SHULE and, per agreement, gave him \$21,000 for one kg. of cocaine. At that time, UCA-2 was informed that ALI ABDUL-KARIM FARHAT was then unavailable to provide him with the cocaine and that it would be handed over at a later time.

42. On December 26, 2003 agents intercepted a call between Al LNU and ZULE OBAWALLAH SHULE, as transcribed below:

Al: [UI], listen, listen, listen, we going to use your friend Larry's [UCA-2] contact to bring the 530 kilos. ⁵

⁵In a previous conversation between Shule and UCA-2 there was a discussion about the transportation of 500 kgs of cocaine from Miami to Detroit. Shule asked whether UCA-2 had

Shule: uh huh.

Al: Me and Ali want you to call Larry and tell him to go to, ah, Gibralators. Go thru the green exit, go to the perfume counter and pick up the package.

Shule: Ok.

Al: Ok. Tell him that Ali goes by the name Hassan. And he will have 21,000 and he will be right back. [UI] He will be right back to pick up another brick. Ok?

Shule: Ok.

Al: Ok. But when he bring you the money for more, tell Larry he won't deal with Hassan. Tell him he will meet your man Amir. Amir is really going to be Ali, that's when we are going to discuss bringing the 530 bricks.

Shule: Ok.

Al: Ok?

Shule: Ok.

Al: Ali is going to have his brother play like you know what I'm saying? He is him and the next time he gives you the money to cop, you send him to Amir.

Zule: Ok.

Al: Which is really going to be Ali.

Shule: Ok.

Al: [UI] bags then he approaches, you're going to Larry about having a meeting with him and the driver.

"mules" to transport the cocaine. UCA-2 informed Shule that he had access to a tractor/trailer and driver.

Shule: Ok.

Al: Yhat's when we going to get that shit from Miami to here. Capisce?

Shule: Ok.

Al: That way if Larry and the truck driver get busted the only one. You know what I'm saying? The only person that it could come back to is Amer which is really going to be Ali.

Shule: Ok.

Al: Understand? Ok, and he won't know who to tell on. You know what I'm saying? So call him and send him to Gibraltar. Tell him Ali goes by the name Hassan. You know what I'm saying? He will pick up the package, and then we go on to plan b when he cops. You dig?

Shule: Ok.

Al: [UI] you know what I'm saying? We ah, we know Big Man is one hundred percent cool, but you better make sure Larry is too, we don't need any beef with Ali.

43. On December 26, 2003, at 2:02 p.m. after the phone call between Al LNU and ZULE OBAWALLAH SHULE (see preceding paragraph). Shule contacted UCA-2 and stated, "Ali is in his other store at the Gibraltar Trade Center in Taylor. I want you to go to the green door -- the green entrance to the perfume counter as soon as you walk in. You can see it straight ahead. " The UCA questioned, "What does Ali look like?" Shule responded, "He use the name, Hassan, in public."

44. At approximately 3:15 p.m. on December 26, 2003, UCA-2 went to the Gibraltar Trade Center and met with "Hassan" (HASSAN ABDUL-KARIM FARHAT) who gave UCA-2 four shopping bags containing various fragrances. One of the bags contained a box, wrapped as a Christmas present. It was later opened. Agents found that

it contained a substance appearing to be cocaine. This substance field tested positively for the presence of cocaine. (UCA-2 was shown a photograph of HASSAN ABDUL-KARIM FARHAT, whom he identified as the person from whom he received the cocaine.)

45. On December 28, 2003, agents intercepted a telephone call between ZULE OBAWALLAH SHULE and Al LNU. Following is a transcript of part of that conversation:

Shule: You all right?

Al LNU: Listen, listen...you have Larry (UCA-2) go to Amer (Ali Farhat)...which is Ali right? But when he get home he'll have five kilos instead of two right?

Shule: Um-hum.

Al LNU: Hear me? You tell him (UCA-2) keep it and he owes you only sixty thousand. When he gives you the sixty thousand, tell him (UCA-2), I know that you just made a little money. Go ahead and give me a hundred thousand and I'll have Amer (Ali Farhat) front you 35 k's (35 kilograms of cocaine).

Shule: Okay.

Al LNU: That's when they'll discuss him (UCA-2) picking up the 530 k's (530 kilograms of cocaine)...then he (UCA-2) knows he's (UCA-2) paid. He (UCA-2) don't owe you nothing...he (UCA-2) just keep the 30 (kilograms of cocaine). When he (UCA-2) gets back (from Miami) and stores the package for us...then we'll send him to Omaha and pick up the remaining 770 k's (770 kilograms of cocaine). We'll give him 7 bricks (7 kilograms of cocaine) and the rest is ours. You understand what I'm saying now?

46. On December 29, 2003, UCA-2 had arranged to meet with ALI ABDUL-KARIM FARHAT to receive what he expected to be 2 kgs of cocaine. That receipt of

cocaine was contingent upon the payment of \$40,000 to ZULE OBAWALLAH SHULE. However, that transaction did not take place. Nevertheless, efforts to have UCA-2 meet with Ali Farhat continued.

47. On December 29, 2003 agents intercepted a call between ZULE OBAWALLAH SHULE and Al LNU. Shule told Al LNU that he was going to give Larry (UCA-2) a little more time and was going to tell Ali (ALI ABDUL-KARIM FARHAT) to wait a little longer. Al LNU replied "okay."

48. On December 29, 2003 at approximately 5:00 p.m. agents intercepted a call between ZULE OBAWALLAH SHULE and Al LNU. Al LNU said "the thirty is secure, Ali (Farhat) left the other bricks at his friend's house on Forrer. . . . Soon as Larry (UCA-2) bringing the money, call Ali (Farhat). . . . Find out how much time he needs to get to the coffee shop. Tell him he'll be meeting with your boy Amir (Ali Farhat)."

49. On December 29, 2003 at approximately 6:00 p.m. ZULE OBAWALLAH SHULE called UCA-2 to discuss when UCA-2 could meet him the following day (12/30) to consummate the cocaine transaction. UCA-2 told Shule that he would call him in the morning.

50. On December 29, 2003 at approximately 6:00 p.m. (a few minutes after the call described above) ZULE OBAWALLAH SHULE made an outgoing call to Al LNU. . Shule told Al LNU that he had just spoken to Larry (UCA-2). Shule assured Al LNU that everything was set up, for the following day when he expected UCA-2 to see him.

51. On December 30, 2003 at approximately 8:00 a.m. ZULE OBAWALLAH SHULE called Al LNU and told him to call New York and to get in touch with Maria

and give her the address where "Easy" could bring the "heroin." (This conversation relates to 3-4 kg. quantity of heroin previously purchased by Shule in New York. In a previous conversation with CI-1 Shule explained that his associate, identified as "Easy," would transport this heroin to Michigan for distribution when he instructed him to do so.)

52. CI-1 reported that on December 30, 2003 at approximately 1:45 a.m. Al LNU met with ZULE OBAWALLAH SHULE at CI-1's apartment, where Shule sometimes stayed when he was in the area. During the course of the meeting, Al LNU said that the house in Oak Park was set. He stated that soon they would also have a house in Troy. CI-1 reported that Al LNU told Shule that as soon as Larry (UCA-2) got with him in the morning, Ali Farhat would be ready for him. Al LNU stated that the thirty kilograms of cocaine were here and ready for Larry (UCA-2). Al LNU said Ali Farhat put up the two kilograms that Larry (UCA-2) was expected to receive that day. Al LNU stated that the two kilograms were at the house of one of Ali's friends at Warren and Forrer. Al LNU stated that Ali Farhat put it there so it would be close and they wouldn't have to be on the road with it for long. CI-1 reported that, during this conversation, Al LNU repeated to Shule at least three times, "make sure you call Ali (Farhat) Amir."

53. CI-1 reported that at approximately 7:00 a.m. on Dec. 30, 2003, ZULE OBAWALLAH SHULE received an undisclosed amount of cash from "Tony" and that Shule directed Tony to go to Dearborn (to meet with Ali Farhat). Shortly after Tony left, Shule made a number of telephone calls in an apparent attempt to reach Ali Farhat. CI-1 heard Shule state that "Tony" was on his way for more. Shule also said that he would send Larry (UCA-2) as soon as he got the money. Shule then attempted to call UCA-2 a

number of times.

54. On December 30, 2003, agents intercepted a telephone call between AI LNU and ZULE OBAWALLAH SHULE. Shule instructed AI LNU to call Maria in New York and tell her to direct "Easy" to transport a quantity of "heroin" to a certain location. AI LNU agreed to do so. A short time later, Shule called AI LNU again and repeated the message.

55. On January 4, 2004, at 9:09 a.m., agents intercepted a phone call from ZULE OBAWALLAH SHULE to AI LNU, who said that he had talked with ORANDE LNU, who told him that "his other buddy from Chicago works for the feds . . . here in Detroit and he believes that they on to Luis or even all of us. . . . ORANDE LNU says his boy works for the FBI . . . did everything to stall things." AI LNU also instructed Shule to get out of the area (Detroit) immediately.

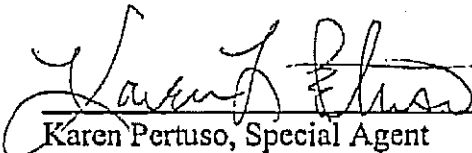
56. On January 4, 2004, at 9:18 a.m., agents intercepted a phone call from ZULE OBAWALLAH SHULE to UCA-2 (Larry). Shule said, "[T]he feds are watching my people. . . we goin' back to DC." Shule also told UCA-2 about the location of "three keys" (cocaine) that he had hidden; Shule wanted UCA-2 to retrieve it. UCA-2 asked about the deal with Amir. Shule responded that would happen in the near future.

57. On Jan. 6, 2004, your affiant, along with other agents of the F.B.I., went to the apartment of CI-1 where ZULE OBAWALLAH SHULE had left 3 kgs of cocaine. We retrieved that cocaine.

58. On January 13, 2004 agents intercepted a call between AI LNU and ORANDE LNU. An excerpt of that transcript is set forth below:

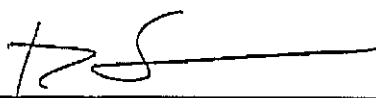
ORANDE: I should have some shit coming in Sunday. I'll have Big Man pick up Zule and we can come to Detroit maybe 2-3 days after with the work. Tell Luis we are going to St. Louis or something. We set up shop with Big Man and his friends, you know . . . fuck Luis and Ali you know? Our goal is to open up shop in Detroit. Big Man opened the door so Fuck everyone else.

AL: OK



Karen Pertuso, Special Agent
Federal Bureau of Investigation

Sworn to and subscribed before me
this 14th day of January, 2004.



Honorable Steven Whalen
United States Magistrate Judge