



IN THE DISTRICT COURT OF THE UNITED STATES

For the Western District of New York

**MARCH 2007 GRAND JURY
(Impaneled March 21, 2007)**

THE UNITED STATES OF AMERICA

-vs-

YEHIA ALI AHMED ALOMARI,
SALEH MOHAMED TAHER SAEED, and
MOHAMED AL HURAIBI,

Defendants.

Violations:

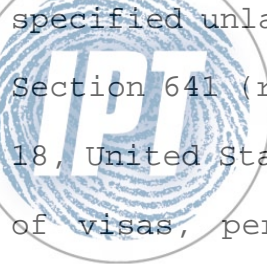
Title 18, United States Code, Sections
1956(h), 1956(a)(3)(A), (B) and (C)
and 2 (16 counts)

COUNT 1

(Money Laundering Conspiracy)

The Grand Jury Charges:

From at least on or about April 21, 2005, and continuing thereafter up to on or about February 26, 2007, in the Western District of New York and elsewhere, defendants YEHIA ALI AHMED ALOMARI ("ALOMARI"), SALEH MOHAMED TAHER SAEED ("SAEED"), MOHAMED AL HURAIBI ("AL HURAIBI"), did knowingly and willfully combine, conspire, and agree, together and with others, known and unknown, to commit offenses against the United States, that is, to conduct and attempt to conduct financial transactions affecting interstate and foreign commerce, which financial transactions involved property represented by law enforcement to be proceeds of specified unlawful activity, and property used to conduct and facilitate



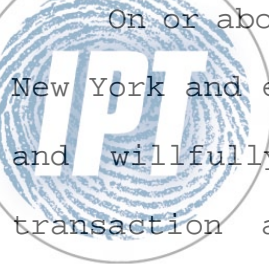
specified unlawful activity, to wit: Title 18, United States Code, Section 641 (relating to public money, property or records); Title 18, United States Code, Section 1546 (relating to fraud and misuse of visas, permits and other immigration documents); Title 18, United States Code, Section 2320 (relating to trafficking in counterfeit goods and services); and Title 21, United States Code, Section 841 (unlawful distribution and manufacturing of prescription drugs), with the intent to promote the carrying on of specified unlawful activity, to conceal and disguise the nature, location, source, ownership and control of the property believed to be the proceeds of said unlawful activity, and to avoid a transaction reporting requirement under Federal law, in violation of Title 18, United States Code, Sections 1956(a)(3)(A), (B) and (C).

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

COUNTS 2 THROUGH 10

(Money Laundering)

The Grand Jury Further Charges:



On or about the dates listed below, in the Western District of New York and elsewhere, the below-listed defendants did knowingly and willfully conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce, such financial transaction described further in each count listed below, which financial transaction involved property represented by law enforcement to be proceeds of specified unlawful activity, and property used to conduct and facilitate specified unlawful activity, to wit: Title 18, United States Code, Section 641 (relating to public money, property or records); Title 18, United States Code, Section 1546 (relating to fraud and misuse of visas, permits and other immigration documents), with the intent to promote the carrying on of specified unlawful activity, to conceal and disguise the nature, location, source, ownership and control of the property believed to be the proceeds of said unlawful activity, and to avoid a transaction reporting requirement under Federal law.

| <u>Count</u> | <u>Defendants</u> | <u>Date</u> | <u>Financial Transaction</u> |
|--------------|--------------------------------|-------------|---|
| 2 | ALOMARI SAEED | 12/15/2005 | \$5,000 deposited into Bank of America account |
| 3 | ALOMARI SAEED | 12/23/2005 | \$3,200 wire transferred from a Bank of America account to a Bank of Arab account |
| 4 | ALOMARI AL HURAIBI SAEED | 8/15/2006 | \$12,000 deposited into a Chase Bank account |
| 5 | ALOMARI AL HURAIBI SAEED | 8/16/2006 | \$7,500 deposited into a ESL Federal Credit Union account |



| | | | |
|----|--------------------------------|------------|--|
| 6 | ALOMARI AL HURAIBI SAEED | 8/16/2006 | \$7,200 wire transferred from a ESL Federal Credit Union account to a Bank of Bahrain and Kuwait account |
| 7 | ALOMARI AL HURAIBI SAEED | 8/21/2006 | \$11,800 wire transferred from a Chase Bank account to a Bank of Bahrain and Kuwait account |
| 8 | ALOMARI AL HURAIBI SAEED | 9/26/2006 | \$15,500 wire transferred from a Citizens Bank account to a Bank of Bahrain and Kuwait account |
| 9 | ALOMARI AL HURAIBI SAEED | 10/11/2006 | \$2,000 wire transferred from a Citizens Bank account to a Bank of Bahrain and Kuwait account |
| 10 | ALOMARI AL HURAIBI SAEED | 10/16/2006 | \$1,500 wire transferred from a Citizens Bank account to a Bank of Bahrain and Kuwait account |

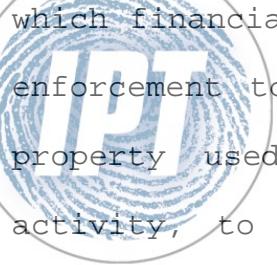
All in violation of Title 18, United States Code, Section 1956(a)(3)(A), (B) and (C) and 2.

COUNTS 11 THROUGH 16

(Money Laundering)

The Grand Jury Further Charges:

On or about the dates listed below, in the Western District of New York and elsewhere, the below-listed defendants did knowingly and willfully conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce, such financial transaction described further in each count listed below,



which financial transaction involved property represented by law enforcement to be proceeds of specified unlawful activity, and property used to conduct and facilitate specified unlawful activity, to wit: Title 18, United States Code, Section 641 (relating to public money, property or records); Title 18, United States Code, Section 1546 (relating to fraud and misuse of visas, permits and other immigration documents); Title 18, United States Code, Section 2320 (relating to trafficking in counterfeit goods and services); and Title 21, United States Code, Section 841 (unlawful distribution and manufacturing of prescription drugs), with the intent to promote the carrying on of specified unlawful activity, to conceal and disguise the nature, location, source, ownership and control of the property believed to be the proceeds of said unlawful activity, and to avoid a transaction reporting requirement under Federal law.

| <u>Count</u> | <u>Defendants</u> | <u>Date</u> | <u>Financial Transaction</u> |
|--------------|-----------------------|-------------|--|
| 11 | ALOMARI AL HURAIBI | 11/9/2006 | \$9,000 deposited into a Chase Bank account |
| 12 | ALOMARI AL HURAIBI | 11/9/2006 | \$5,400 deposited into an ESL Federal Credit Union account |
| 13 | ALOMARI AL HURAIBI | 11/10/2006 | Wire transfer of \$4,999.99 from Bank of America account to a Bank of Bahrain and Kuwait account |
| 14 | ALOMARI AL HURAIBI | 11/14/2006 | \$8,450 wire transferred from a Bank of America account to Bank of Bahrain and Kuwait account |



| | | | |
|----|-----------------------|------------|---|
| 15 | ALOMARI AL HURAIBI | 11/14/2006 | \$5,180 wire transferred from an ESL Federal Credit Union account to a Bank of Bahrain and Kuwait account |
| 16 | ALOMARI AL HURAIBI | 11/20/2006 | Wire transfer of \$8,700 from a Bank of America account to a Bank of Bahrain and Kuwait account |

All in violation of Title 18, United States Code, Section 1956(a)(3)(A), (B) and (C) and 2.

DATED: Rochester, New York, May 7, 2008.

TERRANCE P. FLYNN
UNITED STATES ATTORNEY

s/Timothy C. Lynch

BY: TIMOTHY C. LYNCH
Assistant United States Attorney
United States Attorney's Office
Western District of New York
138 Delaware Avenue
Buffalo, New York 14202
716-843-5700, ext. 846
timothy.lynch@usdoj.gov

A TRUE BILL:

s/Foreperson
FOREPERSON