



FILED
CHARLOTTE, N. C.

JUL 31 2000

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION

U. S. DISTRICT COURT
W. DIST. OF N. C.

UNITED STATES OF AMERICA)

DOCKET NO.

3:00 CR-147-mu

v.)

BILL OF INDICTMENT

1. MOHAMAD YOUSSEF HAMMOUD)

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

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

8 U.S.C. § 1325(c)

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

18 U.S.C. § 201(b)(1)

2. BASSAM YOUSSEF HAMMOOD)

18 U.S.C. § 371

a/k/a Bassem Hammoud)

18 U.S.C. § 982

a/k/a Bassam Hammoud)

18 U.S.C. § 1546(a)

3. CHAWKI YOUSSEF HAMMOUD)

18 U.S.C. § 1956(h)

4. MOHAMAD ATEF DARWICHE)

18 U.S.C. § 2342

a/k/a Mohamad Darwich)

5. ALI HUSSEIN DARWICHE)

a/k/a Ali Hussein Darwich)

6. ALI FAYEZ DARWICHE)

a/k/a Ali Darwich)

a/k/a Ali Darwieh)

7. SAID MOHAMAD HARB)

a/k/a Mustapha Harb)

a/k/a Ahmad Al Alquam)

a/k/a Mohamad Dbouk)

8. ANGELA GEORGIA TSIOUMAS)

a/k/a Angie Tsioumas)

9. MEHDI HACHEM MOUSSAOUI)

a/k/a Mehdi Moussoui)

a/k/a Mehdi Masawi)

10. FATME MOHAMAD HARB)

a/k/a Fatima Harb)

a/k/a Fahtme Harb)

11. SAMIR MOHAMAD ALI DEBK)

a/k/a Samir Depk)

12. HAISSAM MOHAMAD HARB)

a/k/a Mohamad Dbouk)

13. TERRI JEANNE PISH)

14. TONIA YVONNE MOORE)

15. JESSICA YOLANDA FORTUNE)

16. MARIE LUCIE CADET)
17. MARY DENISE COVINGTON)
18. WAYNE JEFFREY SWARINGEN)
_____)
_____)

THE GRAND JURY CHARGES:

COUNT ONE

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

MOHAMAD YOUSSEF HAMMOUD

a/k/a Ali A. A. Abousaleh

a/k/a Ali A. A. Albousaleh

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

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

COUNT TWO

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

MOHAMAD YOUSSEF HAMMOUD

a/k/a Ali A. A. Abousaleh

a/k/a Ali A. A. Albousaleh

a native and citizen of Lebanon, did knowingly present to the Immigration and Naturalization Service a Petition to Remove the Conditions on Residence (INS Form I-751), which Petition contained a statement or statements MOHAMAD YOUSSEF HAMMOUD, a/k/a Ali A. A. Abousaleh, a/k/a Ali A. A. Albousaleh, then and there knew were false, to wit, that he had not used a name other than Mohamad Hammoud, that he had not committed any crime and that his marriage

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to Angela Georgia Tsioumas was in accordance with the laws of the place of the marriage, and that said Petition was submitted to secure for himself unconditional lawful permanent residence status in the United States of America.

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

COUNT THREE

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

ANGELA GEORGIA TSIUMAS

a/k/a Angie Tsioumas

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

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

COUNT FOUR

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

ANGELA GEORGIA TSIUMAS

a/k/a Angie Tsioumas

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

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

COUNT FIVE

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

**CHAWKI YOUSSEF HAMMOUD
JESSICA YOLANDA FORTUNE**

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

1. Chawki Youssef Hammoud, a native and citizen of Lebanon, entered the United States on August 16, 1990 at JFK International Airport, New York City, NY. Chawki Hammoud then presented a Lebanese passport bearing an Exchange Visitor (J-1) U.S. NIV issued at Damascus, Syria. Chawki Hammoud was admitted until January 30, 1991.
2. On July 12, 1994, Chawki Youssef Hammoud married Jessica Yolanda Fortune in Lancaster, SC. On or about January 6, 1995, Jessica Yolanda Fortune filed a Petition for Alien Relative (INS Form I-130) at Charlotte, NC. On or about January, 6 1995, Chawki Youssef Hammoud filed an Application to Register Permanent Residence or Adjust Status (INS Form I-485) at Charlotte, NC.
3. On or about May 1, 1995, Chawki Youssef Hammoud and Jessica Yolanda Fortune were interviewed under oath by an INS Examiner at Charlotte, NC relative to their marriage. On May 1, 1995, Chawki Youssef Hammoud was granted Conditional Lawful Permanent Resident (LPR) status (CR-6) at Charlotte, NC. On June 6, 1997, Chawki Youssef Hammoud had his status adjusted to that of Lawful Permanent Resident (LPR) (IR-6) of the United States.
4. Chawki Youssef Hammoud and Jessica Yolanda Fortune do not reside together. Chawki Youssef Hammoud resides at 4412 Brittmore Court, Charlotte, NC with Dalida Darwiche.

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Jessica Yolanda Fortune resides at 124 S. Cecil Street, Lexington, NC. Nonetheless, Chawki Youssef Hammoud and Jessica Yolanda Fortune have continued to represent themselves to the INS as husband and wife.

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

COUNT SIX

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

MOHAMAD ATEF DARWICHE
a/k/a Mohamad Darwich

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

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

COUNT SEVEN

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

MOHAMAD ATEF DARWICHE
a/k/a Mohamad Darwich

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

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

COUNT EIGHT

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

MARY DENISE COVINGTON

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

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

COUNT NINE

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

MARY DENISE COVINGTON

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

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

COUNT TEN

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

ALI HUSSEIN DARWICHE
a/k/a Ali Hussein Darwich

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

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

COUNT ELEVEN

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

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

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

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

COUNT TWELVE

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

ALI FAYEZ DARWICHE

a/k/a Ali Darwich

a/k/a Ali Darwieh

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

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

COUNT THIRTEEN

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

MARIE LUCIE CADET

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

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

COUNT FOURTEEN

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

MARIE LUCIE CADET

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

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

COUNT FIFTEEN

On or about October 5, 1999, in Larnaca, Cyprus,

FATME MOHAMAD HARB

a/k/a Fatima Harb

a/k/a Fahtme Harb

a native and citizen of Lebanon, did knowingly enter into a marriage with Wayne Jeffrey Swaringen, a United States citizen, for the purpose of evading a provision of the immigration laws, that is, to assist her in securing a lawful immigrant visa to the United States based on the immediate relative status conferred by Title 8, United States Code, Section 1151(b)(2)(A)(i), as an alien married to a citizen of the United States.

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

COUNT SIXTEEN

On or about October 6, 1999, at the United States Embassy in Nicosia, Cyprus,

FATME MOHAMAD HARB

a/k/a Fatima Harb

a/k/a Fahtme Harb

a native and citizen of Lebanon, did knowingly present to a consular official of the United States Department of State an Application for Immigrant Visa and Alien Registration (State Department Form OF 230), which application contained a statement FATME MOHAMAD HARB, a/k/a Fatima Harb, a/k/a Fahtme Harb, then and there knew was false, to wit, FATME MOHAMAD HARB, a/k/a Fatima Harb, a/k/a Fahtme Harb, claimed that she was married to Wayne Jeffrey Swaringen, a United States citizen, knowing that her marriage to Wayne Jeffrey Swaringen was a sham, false and fraudulent marriage entered into for the purpose of enabling FATME MOHAMAD HARB, a/k/a Fatima Harb, a/k/a Fahtme Harb, to secure a lawful immigrant visa in the United States.

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

COUNT SEVENTEEN

On or about October 6, 1999, at the United States Embassy in Nicosia, Cyprus,

FATME MOHAMAD HARB

a/k/a Fatima Harb

a/k/a Fahtme Harb

a native and citizen of Lebanon, did knowingly present to a consular official of the United States Department of State an Application for Immigrant Visa and Alien Registration (State Department Form OF 230), which application contained a statement FATME MOHAMAD HARB, a/k/a Fatima Harb, a/k/a Fahtme Harb, then and there knew was false, to wit, FATME MOHAMAD HARB, a/k/a Fatima Harb, a/k/a Fahtme Harb, claimed no prior marriages, knowing that she was married to Samir Mohamad Ali Debek, a/k/a Samir Depk, a native and citizen of Lebanon.

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

COUNT EIGHTEEN

On or about January 21, 2000, at the United States Embassy in Nicosia, Cyprus,

FATME MOHAMAD HARB

a/k/a Fatima Harb

a/k/a Fahtme Harb

a native and citizen of Lebanon, did knowingly obtain an immigrant visa for authorized entry into the United States, which FATME MOHAMAD HARB, a/k/a Fatima Harb, a/k/a Fahtme Harb, knew to be procured by means of false statements on her Application for Immigrant Visa and Alien Registration (State Department Form OF 230) presented to a consular official of the United States Department of State on or about October 6, 1999, namely, that she was married to Wayne Jeffrey Swaringen, a United States citizen, and that she had no prior marriages, knowing that her marriage to Wayne Jeffrey Swaringen was a sham, false and fraudulent marriage and that she was married to Samir Mohamad Ali Debk, a/k/a Samir Depk, a native and citizen of Lebanon.

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

COUNT NINETEEN

On or about October 5, 1999, in Larnaca, Cyprus,

WAYNE JEFFREY SWARINGEN

a United States citizen, did knowingly enter into a marriage with Fatme Mohamad Harb, a/k/a Fatima Harb, a/k/a Fahtme Harb, for the purpose of evading a provision of the immigration laws, that is, to assist Fatme Mohamad Harb, a/k/a Fatima Harb, a/k/a Fahtme Harb, a native and citizen of Lebanon, to secure a lawful immigrant visa in the United States based on the immediate relative status conferred by Title 8, United States Code, Section 1151(b)(2)(A)(i), as an alien married to a citizen of the United States.

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

COUNT TWENTY

On or about October 6, 1999, at the United States Embassy in Nicosia, Cyprus,

WAYNE JEFFREY SWARINGEN

a United States citizen, did knowingly present to a consular official of the United States Department of State a Petition for Alien Relative (INS Form I-130) on behalf of Fatme Mohamad Harb, a/k/a Fatima Harb, a/k/a Fahtme Harb, a native and citizen of Lebanon, which petition contained a statement WAYNE JEFFREY SWARINGEN then and there knew was false, to wit, WAYNE JEFFREY SWARINGEN, claimed that he was married to Fatme Mohamad Harb, a/k/a Fatima Harb, a/k/a Fahtme Harb, knowing that his marriage to Fatme Mohamad Harb, a/k/a Fatima Harb, a/k/a Fahtme Harb, was a sham, false and fraudulent marriage entered into for the purpose of enabling Fatme Mohamad Harb, a/k/a Fatima Harb, a/k/a Fahtme Harb, to secure a lawful immigrant visa in the United States.

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

COUNT TWENTY-ONE

On or about January 4, 1999, at the United States Embassy, in Nicosia, Cyprus,

SAMIR MOHAMAD ALI DEBK

a/k/a Samir Depk

a native and citizen of Lebanon, did knowingly present to a consular official of the United States Department of State, a Non-Immigrant Visa Application (Form OF-156), which contained a false statement SAMIR MOHAMAD ALI DEBK, a/k/a Samir Depk, then and there knew was false, to wit, SAMIR MOHAMAD ALI DEBK, a/k/a Samir Depk, represented to the consular official that the purpose of his travel to the United States was a ten-day trip to conduct business with Cotton/Feather Company in Stamford, Connecticut.

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

COUNT TWENTY-TWO

On or about January 4, 1999, at the United States Embassy, in Nicosia, Cyprus,

SAMIR MOHAMAD ALI DEBK
a/k/a Samir Depk

a native and citizen of Lebanon, did knowingly obtain a nonimmigrant visa for authorized entry into the United States, which SAMIR MOHAMAD ALI DEBK, a/k/a Samir Depk, knew to be procured by means of a false statement on the Nonimmigrant Visa Application (Form OF-156) presented to a consular official of the United States Department of State on or about January 4, 1999, and a false material fact represented to said consular official during his interview on January 4, 1999, namely, that the purpose of his visit was to conduct business at Cotton/Feather Company in Stamford, Connecticut.

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

COUNT TWENTY-THREE

On or about April 6, 1999, at Charlotte, in Mecklenburg County, North Carolina, within the Western District of North Carolina,

SAMIR MOHAMAD ALI DEBK
a/k/a Samir Depk

a native and citizen of Lebanon, having entered the United States on or about January 11, 1999, and having been admitted as a visitor until on or about April 1, 1999, did knowingly enter into a marriage with Terri Jeanne Pish, a United States citizen, for the purpose of evading a provision of the immigration laws, that is, to adjust his immigration status to a Lawful Permanent Resident based on the immediate relative status conferred by Title 8, United States Code, Section 1151(b)(2)(A)(i), as an alien married to a citizen of the United States.

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

COUNT TWENTY-FOUR

On or about April 8, 1999, at Charlotte, in Mecklenburg County, North Carolina, within the Western District of North Carolina,

SAMIR MOHAMAD ALI DEBK
a/k/a Samir Depk

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

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

COUNT TWENTY-FIVE

On or about April 6, 1999, at Charlotte, in Mecklenburg County, North Carolina, within the Western District of North Carolina,

TERRI JEANNE PISH

a United States citizen, did knowingly enter into a marriage with Samir Mohamad Ali Debk, a/k/a Samir Depk, for the purpose of evading a provision of the immigration laws, that is, to assist Samir Mohamad Ali Debk, a/k/a Samir Depk, a native and citizen of Lebanon admitted to the United States as a visitor until April 1, 1999, in adjusting his immigration status to a Lawful Permanent Resident based on the immediate relative status conferred by Title 8, United States Code, Section 1151(b)(2)(A)(i), as an alien married to a citizen of the United States.

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

COUNT TWENTY-SIX

On or about April 8, 1999, at Charlotte, in Mecklenburg County, North Carolina, within the Western District of North Carolina,

TERRI JEANNE PISH

a United States citizen, did knowingly present to the Immigration and Naturalization Service a Petition for Alien Relative (INS Form I-130) on behalf of Samir Mohamad Ali Debk, a/k/a Samir Depk, a native and citizen of Lebanon, which petition contained a statement TERRI JEANNE PISH then and there knew was false, to wit, TERRI JEANNE PISH represented to the Immigration and Naturalization Service that she was married to Samir Mohamad Ali Debk, a/k/a Samir Depk, knowing that her marriage to Samir Mohamad Ali Debk, a/k/a Samir Depk, was a sham, false and

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fraudulent marriage entered into for the purpose of enabling Samir Mohamad Ali Debk, a/k/a Samir Depk, to secure a permanent resident status in the United States.

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

COUNT TWENTY-SEVEN

On or about January 4, 1999, at the United States Embassy in Nicosia, Cyprus,

HAISSAM MOHAMAD HARB
a/k/a Mohamad Dbouk

a native and citizen of Lebanon, did knowingly present to a consular official of the United States Department of State, a Nonimmigrant Visa Application (Form OF-156), which contained false statements HAISSAM MOHAMAD HARB, a/k/a Mohamad Dbouk, then and there knew were false, to wit, HAISSAM MOHAMAD HARB, a/k/a Mohamad Dbouk, represented to the consular official that the purpose of his travel to the United States was a one-week trip to conduct business with Quilt Crafters in Rochester, New York, and that he had no relatives in the United States.

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

COUNT TWENTY-EIGHT

On or about January 5, 1999, at the United States Embassy in Nicosia, Cyprus,

HAISSAM MOHAMAD HARB
a/k/a Mohamad Dbouk

a native and citizen of Lebanon, did knowingly obtain a nonimmigrant visa for authorized entry into the United States, which HAISSAM MOHAMAD HARB, a/k/a Mohamad Dbouk, knew to be procured by means of false statements on the Nonimmigrant Visa Application (Form OF-156) presented to a consular official of the United States Department of State on or about January 4, 1999, and false material facts represented to said consular official during his interview on January 4, 1999, namely, that the purpose of his visit was to conduct business at Quilt Crafters in Rochester, New York, and that he had no relatives in the United States.

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

COUNT TWENTY-NINE

On or about March 8, 1999, at Charlotte, in Mecklenburg County, North Carolina, within the Western District of North Carolina,

HAISSAM MOHAMAD HARB
a/k/a Mohamad Dbouk

a native and citizen of Lebanon, having entered the United States on or about January 11, 1999 and having been admitted as a visitor until on or about April 10, 1999, did knowingly enter into a marriage with Tonia Yvonne Moore, a United States citizen, for the purpose of evading a provision of the immigration laws, that is, to adjust his immigration status to a Lawful Permanent Resident based on the immediate relative status conferred by Title 8, United States Code, Section 1151(b)(2)(A)(i), as an alien married to a citizen of the United States.

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

COUNT THIRTY

On or about April 6, 1999, at Charlotte, in Mecklenburg County, North Carolina, within the Western District of North Carolina,

HAISSAM MOHAMAD HARB
a/k/a Mohamad Dbouk

a native and citizen of Lebanon, did knowingly present to the Immigration and Naturalization Service an Application to Register Permanent Residence or Adjust Status (INS Form I-485) which contained a statement HAISSAM MOHAMAD HARB, a/k/a Mohamad Dbouk, then and there knew was false, to wit, HAISSAM MOHAMAD HARB, a/k/a Mohamad Dbouk, represented to the Immigration and Naturalization Service that he was married to Tonia Yvonne Moore, a United States citizen, knowing that his marriage to Tonia Yvonne Moore was a sham, false and fraudulent marriage entered into for the purpose of enabling HAISSAM MOHAMAD HARB, a/k/a Mohamad Dbouk, to secure a Lawful Permanent Resident visa in the United States.

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

COUNT THIRTY-ONE

On or about March 8, 1999, at Charlotte, in Mecklenburg County, North Carolina, within the Western District of North Carolina,

TONIA YVONNE MOORE

a United States citizen, did knowingly enter into a marriage with Haissam Mohamad Harb, a/k/a Mohamad Dbouk, for the purpose of evading a provision of the immigration laws, that is, to assist Haissam Mohamad Harb, a/k/a Mohamad Dbouk, a native and citizen of Lebanon admitted to the United States as a visitor until April 10, 1999, in adjusting his immigration status to a Lawful Permanent Resident based on the immediate relative status conferred by Title 8, United States Code, Section 1151(b)(2)(A)(i), as an alien married to a citizen of the United States.

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

COUNT THIRTY-TWO

On or about April 6, 1999, at Charlotte, in Mecklenburg County, North Carolina, within the Western District of North Carolina,

TONIA YVONNE MOORE

a United States citizen, did knowingly present to the Immigration and Naturalization Service a Petition for Alien Relative (INS Form I-130) on behalf of Haissam Mohamad Harb, a/k/a Mohamad Dbouk, a native and citizen of Lebanon, which petition contained a statement TONIA YVONNE MOORE then and there knew was false, to wit, TONIA YVONNE MOORE, represented to the Immigration and Naturalization Service that she was married to Haissam Mohamad Harb, a/k/a Mohamad Dbouk, knowing that her marriage to Haissam Mohamad Harb, a/k/a Mohamad Dbouk, was a sham, false and fraudulent marriage entered into for the purpose of enabling Haissam Mohamad Harb, a/k/a Mohamad Dbouk, to secure a permanent resident status in the United States.

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

COUNT THIRTY-THREE

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

**SAID MOHAMAD HARB
a/k/a Mustapha Harb**

**a/k/a Ahmad Al Alquam
a/k/a Mohamad Dbouk
HAISSAM MOHAMAD HARB
a/k/a Mohamad Dbouk
SAMIR MOHAMAD ALI DEBK
a/k/a Samir Depk
FATME MOHAMAD HARB
a/k/a Fatima Harb
a/k/a Fahtme Harb
TONIA YVONNE MOORE
TERRI JEANNE PISH
WAYNE JEFFREY SWARINGEN**

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

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

1. On or about January 5, 1999, SAID MOHAMAD HARB, a/k/a Mustapha Harb, a/k/a Ahmad Al Alquam, a/k/a Mohamad Dbouk, assisted HAISSAM MOHAMAD HARB, his brother and a native and citizen of Lebanon, in securing a US Non-Immigrant Visa issued at Nicosia, Cyprus, for an alleged one-week business trip to Quilt Crafters located in Rochester, New York.

2. On or about January 11, 1999, HAISSAM MOHAMAD HARB entered the United States at Chicago, Illinois, and presented a Lebanese passport bearing a Visitor (B-2) US Non-Immigrant Visa issued at Nicosia, Cyprus, on January 5, 1999.

3. On or about March 8, 1999, SAID MOHAMAD HARB, a/k/a Mustapha Harb, a/k/a Ahmad Al Alquam, a/k/a Mohamad Dbouk, paid a sum of money to TONIA YVONNE MOORE to marry his brother, HAISSAM MOHAMAD HARB, a native and citizen of Lebanon, for the

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purpose of obtaining a Lawful Permanent Resident status in the United States. HAISSAM MOHAMAD HARB married TONIA YVONNE MOORE on or about March 8, 1999, in Charlotte, North Carolina.

4. On or about January 4, 1999, SAID MOHAMAD HARB, a/k/a Mustapha Harb, a/k/a Ahmad Al Alquam, a/k/a Mohamad Dbouk, assisted SAMIR MOHAMAD ALI DEBK, his brother-in-law and a native and citizen of Lebanon, in securing a US Non-Immigrant Visa issued at Nicosia, Cyprus, for an alleged ten-day business trip to Cotton/Feather Company located in Stamford, Connecticut.

5. On or about January 11, 1999, Samir Mohamad Ali Debk entered the United States at Chicago, Illinois, and presented a Lebanese passport bearing a Visitor (B-2) US Non-Immigrant Visa issued at Nicosia, Cyprus, on January 4, 1999.

6. On or about April 6, 1999, SAID MOHAMAD HARB, a/k/a Mustapha Harb, a/k/a Ahmad Al Alquam, a/k/a Mohamad Dbouk, paid a sum of money to TERRI JEANNE PISH to marry his brother-in-law, SAMIR MOHAMAD ALI DEBK, a native and citizen of Lebanon, for the purpose of obtaining a Lawful Permanent Resident status in the United States. SAMIR MOHAMAD ALI DEBK married TERRY JEANNE PISH on April 6, 1999, in Charlotte, North Carolina.

7. On an uncertain date prior to October 5, 1999, SAID MOHAMAD HARB, a/k/a Mustapha Harb, a/k/a Ahmad Al Alquam, a/k/a Mohamad Dbouk, traveled to Lebanon and Cyprus with WAYNE JEFFREY SWARINGEN, a United States citizen, to arrange a fraudulent marriage between SAID MOHAMAD HARB'S sister, FATME MOHAMAD HARB, a native and citizen of Lebanon, and WAYNE JEFFREY SWARINGEN in order for FATME MOHAMAD HARB to obtain an immigrant visa to the United States.

8. On or about October 5, 1999, SAID MOHAMAD HARB, a/k/a Mustapha Harb, a/k/a Ahmad Al Alquam, a/k/a Mohamad Dbouk, paid WAYNE JEFFREY SWARINGEN to marry FATME MOHAMAD HARB. WAYNE JEFFREY SWARINGEN married FATME MOHAMAD HARB on or about October 5, 1999 in Larnaca, Cyprus.

9. On or about January 27, 2000, FATME MOHAMAD HARB entered the United States at Atlanta, Georgia and presented a Lebanese passport and a US Immigrant Visa (CR-10) issued at Nicosia, Cyprus, on January 21, 2000.

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

COUNT THIRTY-FOUR

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

SAID MOHAMAD HARB

a/k/a Mustapha Harb

a/k/a Ahmad Al Alquam

a/k/a Mohamad Dbouk

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

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

COUNT THIRTY-FIVE

INTRODUCTORY PARAGRAPHS

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

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

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

MOHAMAD YOUSSEF HAMMOUD

a/k/a Ali A. A. Abousaleh

a/k/a Ali A. A. Albousaleh

BASSAM YOUSSEF HAMMOUD

a/k/a Bassem Hammoud

a/k/a Bassam Hammoud

CHAWKI YOUSSEF HAMMOUD

MOHAMAD ATEF DARWICHE

a/k/a Mohamad Darwich

ALI HUSSEIN DARWICHE

a/k/a Ali Hussein Darwich

ALI FAYEZ DARWICHE

a/k/a Ali Darwich

a/k/a Ali Darwieh

SAID MOHAMAD HARB

a/k/a Mustapha Harb

**a/k/a Ahmad Al Alquam
a/k/a Mohamad Dbouk
ANGELA GEORGIA TSIOUMAS
a/k/a Angie Tsioumas
MEHDI HACHEM MOUSSAOUI
a/k/a Mehdi Moussoui
a/k/a Mehdi Masawi**

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

OBJECT OF THE CONSPIRACY

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

OVERT ACTS IN FURTHERANCE OF THE CONSPIRACY

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

1. On or about March 3, 1996, CHAWKI YOUSSEF HAMMOUD was stopped by West Virginia State Police transporting approximately 405 cartons of cigarettes from North Carolina to Michigan for resale.
2. On or about January 24, 1997, ALI FAYEZ DARWICHE loaded three mini-vans with cigarettes at JR Tobacco in Statesville, North Carolina. Those vans, driven by BASSAM HAMMOOD, MEHDI MOUSSAOUI and another individual were later stopped by Kentucky Department of Motor Vehicles. A total of approximately 4,464 cartons of cigarettes were seized.
3. On or about February 27, 1997, MOHAMAD HAMMOUD and CHAWKI HAMMOUD loaded a large quantity of cigarettes into a van at JR Tobacco in Statesville, North Carolina. They transported the cigarettes to a mini-warehouse, where they were later loaded into two vehicles. These vehicles, one of which was driven by MOHAMAD HAMMOUD, were thereafter driven to Michigan and unloaded.
4. On or about April 14, 1997, MOHAMAD HAMMOUD was stopped by West Virginia State Police and was found to be in possession of \$45,922.00.

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5. On or about July 7, 1997, a van rented by MOHAMMAD ATEF DARWICHE was loaded with a large quantity of cigarettes at JR Tobacco in Statesville, North Carolina. The cigarettes were later reloaded into two mini-vans, which were driven to the homes of ANGELA TSIUMAS and SAID HARB. The following day SAID HARB drove one of the mini-vans to Michigan and unloaded the cigarettes at a gas station.

6. On or about August 25, 1997, ANGELA TSIUMAS drove a mini-van from Charlotte, North Carolina to West Virginia. She was stopped by West Virginia State Police and found to be in possession of 1,455 cartons of cigarettes.

7. On or about March 24, 1998, at Eastway Tobacco, CHAWKI HAMMOUD sold 1,080 cartons of cigarettes to an individual he believed was going to transport them to Michigan for resale.

8. On or about August 4, 1998, a van rented by ALI FAYEZ DARWICHE was loaded with large quantities of cigarettes at Golden Leaf Tobacco in Blacksburg, South Carolina and at JR Tobacco in Statesville, North Carolina. The cigarettes were unloaded by ALI FAYEZ DARWICHE into a mini-warehouse rented by him. The cigarettes were later loaded by ALI FAYEZ DARWICHE and another individual into a vehicle that was stopped by West Virginia State Police. Inside the vehicle were 809 cartons of cigarettes.

9. In or about March 1999, ANGELA TSIUMAS sold more than \$11,000.00 of cigarettes to an individual she believed would transport them to Michigan for resale.

10. During the course of the conspiracy MOHAMAD HAMMOUD and SAID HARB recruited and paid various individuals to drive contraband cigarettes from Charlotte, North Carolina to Michigan for delivery.

11. During the course of the conspiracy BASSAM HAMMOOD, CHAWKI HAMMOUD, MOHAMAD HAMMOUD, ALI FAYEZ DARWICHE and ALI HUSSEIN DARWICHE rented mini-warehouses which were used for the storage of contraband cigarettes.

12. During the course of the conspiracy SAID HARB and ANGELA TSIUMAS made purchases of bulk quantities of cigarettes intended for shipment from North Carolina to Michigan.

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

14. During the course of the conspiracy the co-conspirators engaged in numerous acts of money laundering and conspiracy to launder money, as alleged in Count 36.

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

COUNT THIRTY-SIX

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

MOHAMAD YOUSSEF HAMMOUD

a/k/a Ali A. A. Abousaleh

a/k/a Ali A. A. Albousaleh

BASSAM YOUSSEF HAMMOUD

a/k/a Bassem Hammoud

a/k/a Bassam Hammoud

CHAWKI YOUSSEF HAMMOUD

MOHAMAD ATEF DARWICHE

a/k/a Mohamad Darwich

ALI HUSSEIN DARWICHE

a/k/a Ali Hussein Darwich

ALI FAYEZ DARWICHE

a/k/a Ali Darwich

a/k/a Ali Darwieh

SAID MOHAMAD HARB

a/k/a Mustapha Harb

a/k/a Ahmad Al Alquam

a/k/a Mohamad Dbouk

ANGELA GEORGIA TSIUMAS

a/k/a Angie Tsioumas

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

- (a) knowing that the property involved in a financial transaction represented the proceeds of some form of unlawful activity, to conduct and attempt to conduct such a financial transaction with the intent to promote the carrying on of specified unlawful activity in violation of 18 U.S.C. § 1956(a)(1)(A)(i); and
- (b) knowing that the property involved in a financial transaction represented the proceeds of some form of unlawful activity, to conduct and attempt to conduct such

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a financial transaction with intent to engage in conduct constituting a violation of § 7201 or § 7206 of the Internal Revenue Code of 1986 in violation of 18 U.S.C. § 1956(a)(1)(A)(ii); and

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

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

NOTICE OF FORFEITURE

Notice is hereby given that:

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

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

REAL PROPERTY AND BUSINESSES

1. BP Gas Station d/b/a M and A Oil, Inc., located at Exit 60 I 85, the assets, inventory, and accounts used by this business entity, including the real estate where it is located, Lot Number two (2) of Copperfield, Northeast, a map of which is recorded in Map Book 35, Page 55, Cabarrus County Registry, consisting of 1.2 acres, more or less, and conveyed to M.A. Oil, Inc. at 5425 Donnefield Dr. Charlotte, NC 28227 by deed recorded on February 3, 2000 at Book 2782, Page 328 Cabarrus County Registry.
2. 5425 Donnefield Drive, Charlotte, NC 28227, the residence of Mohammad Youssef Hammoud, Ali Hussein Darwiche, Mohamad Atef Darwiche, and Angela Tsioumas, more particularly described in a deed to Angela Georgia Tsioumas, dated 2/27/98, and recorded at Book 9522, Page 339, Mecklenburg County Registry.
3. 8521 Mineral Ridge Way, Charlotte, NC 28269, as described in a deed to Ali F. Darwiche recorded May 29, 1998 at Book 9704, Page 387, Mecklenburg County Registry. The residence of Ali Faye Darwich.

CURRENCY

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

VEHICLES

1. 1999 Toyota 4-Runner, NC License Plate LPX-4358, VIN JT3HN87R3X9022012, titled in the name of Angela G. Tsioumas,.
2. 1998 Black Lincoln, Navigator, NC License Plate MXW-4081, VIN 5LMFU28L7WLJ04266, owned and driven by Said Harb, but registered to Mohit Behl who is a nominee.
3. 1999 Black Mercedes model CLK430, VIN WDBLJ70G6XF078708, NC temporary tag, seized at Said Harb's residence.
4. 1999 Lexus, NC License Plate ALICO1, VIN JT6HT00W9X0025091, titled in the name of Ali Darwich, owned and operated by Ali F. Darwiche.
5. 1998 Ford Van, NC License Plate ALIC03, VIN 1FTNE24L7WHA01745, titled in the name of Alico Painting; .

FINANCIAL ACCOUNTS

1. All funds in accounts in the name or control of Mohamad Hammoud, SSN 237-75-3540, a/k/a Ali A. A. Albousaleh, SSN 246-81-0641, or one of his aliases, including the following:
 - a. First Union checking account number 1000000789647.
 - b. First Union savings account number 3000000948745.
 - c. Huntington Bank of Michigan checking account number 4242015032.
 - d. First Union checking account number 10000004574654.
 - e. Centura Bank checking account number 300-303-031-3.
 - f. Huntington Bank of Michigan checking account number 2010727460.
2. All funds in accounts in the name or control of Angela Tsioumas or one of her aliases, including the following:
 - a. Centura Bank checking account number 300-303-814-7.
 - b. Centura Bank money market account number 300-305-432-3.
3. All funds in accounts in the name or control of Said Harb or one of his aliases, including the following:
 - a. NationsBank checking account number 651571879.
4. All funds in accounts in the name or control of Chawki Hammoud and Dalida Darwiche or one of their aliases, including the following:
 - a. BB&T checking account number 5212566383.
 - b. Centura checking account number 3003038681.
 - c. Centura savings account number 3009016969.

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5. All funds in accounts in the name or control of Bassam Hamood or one of his aliases, including the following:
 - a. Wachovia checking account number 31869-225180 and saving account number 1869776488.
6. All funds in accounts in the name or control of Mohamad Darwiche or one of his aliases, including the following:
 - a. First Union checking number 3140160.
7. All funds in accounts in the name or control of Ali Fayez Darwiche or one of his aliases, including the following:
 - a. First Union checking account, number 2000000642262 (in the name of Alico Painting).
 - b. First Union checking account number 1000000788130 and savings account, number 3000000223923.
 - c. Centura Bank checking account number 3003053064.
 - d. Centura Bank checking account number 3000004005 (in the name of Alico Painting).
 - e. First Union checking account number 1000000788156 and savings account number 3000000948554.
8. All funds in the following accounts:
 - a. Account number 3003030313 at Centura Bank in the name of Ali A. A. Abousaleh.
 - b. Centra Bank account number 3000010827 in the name of Cedarland Palace.
 - c. Account number 0005402328 at First Charter National Bank in the name of M&A Oil Inc.
 - d. Bank of America account number 000682137870 in the name of Ahmad A. Darwiche.

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- e. Account number 001115189 at First Charter National Bank in the name of Sorben Inc. d/b/a Cedarland.
- f. First Union National Bank account number 1010016570791 in the name of Pierrot N. Sammour.
- g. Centura Bank account 3003091056, jointly in the name of Mohamad Hammoud and Naame Ahmad Darwiche.
- h. Account number 3003059351 at Centura Bank in the name of Mohamad Atef Darwiche and Mary Denise Covington.
- i. ETrade Security Account number 10100069546102196464756441 in the name of Ali Fayez Darwiche.
- j. Account numbers 540105258, 1000004677768, 2000001086830, and 21000000955409 at First Union National Bank, all in the name of some combination of Ali Fayez Darwiche and/or his business, Alico Painting Co.
- k. Account numbers 0005402328 and 1190520 at First Charter National Bank in the name of M&A Oil Inc.

A TRUE BILL:



MARK T. CALLOWAY
UNITED STATES ATTORNEY



KENNETH D. BELL, FIRST ASSISTANT
UNITED STATES ATTORNEY