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MAR 13 2003  
CLERK U.S. DISTRICT COURT  
DISTRICT OF ARIZONA  
DEPUTY

UNITED STATES DISTRICT COURT  
DISTRICT OF ARIZONA

United States of America,  
Plaintiff,

v.

1. Samih Fadl Jamal,  
aka Samih Jammal,  
aka Sammy,  
aka Sam;  
(Counts 1-8)
2. Tamer Fayez Swailem,  
aka Tony,  
aka Tony Swailem,  
aka Tony Jamal;  
(Counts 1-4 & 8)
3. Marwan Fadl Jamal;  
(Counts 1 & 8)
4. Abdulrazzak Fadl Jamal,  
aka Abdul Jamal,  
aka Abdulrazzak Fadl Jammal;  
(Counts 1-4 & 8)
5. Ramy Fadl Jamal,  
aka Rami,  
aka Rami Fadl Jammal;  
(Counts 1-4, & 8)
6. Mamoun Al-Jamal; CA  
(Counts 1-4 & 8)
7. Walid Fadl Jamal;  
aka Walid Jamal;  
(Counts 1 & 8)
8. Hani Jamal Sarawan;  
(Counts 1 & 8)

CR03-261-PHX

INDICTMENT

- VIO: 18 U.S.C. § 371  
(Conspiracy to Commit  
Interstate Transportation  
and Receipt of Stolen  
Property)  
Count 1
- 18 U.S.C. § 2314 & 2  
(Interstate Receipt of  
Stolen Property & Aid and  
Abet)  
Counts 2 and 4
- 18 U.S.C. § 2315 & 2  
(Interstate Transportation  
of Stolen Property & Aid  
and Abet)  
Count 3
- 18 U.S.C. § 1001  
(False Statement)  
Counts 5, 6 and 7
- 18 U.S.C. § 1956(h)  
(Conspiracy to Commit  
Money Laundering)  
Count 8
- 18 U.S.C. § 981, 982  
28 U.S.C. § 2461(c)  
(Forfeiture Allegations)

- 1 9. Saad Toma Yohanan; CA  
2 (Counts 1 & 8)
- 3 10. Abdul Khader Khaled Hamze;  
4 aka Abdul Khader Hamze;  
(Counts 1 & 8)
- 5 11. Ahmad My Alhulaisi;  
(Counts 1 & 8)
- 6 12. Kahled Ahmad Noaman;  
7 (Counts 1 & 8)
- 8 13. Ahmed Mohamed Ashry;  
(Counts 1-4, 8)
- 9 14. Mustapha Mohamad Khodr;  
10 (Counts 1-4 & 8)
- 11 15. Fadel Hindi;  
(Counts 1 & 8)
- 12 16. Abdelsalam Mohamad Abdelsalam;  
13 aka Abdelsalm Abdelsalam;  
(Counts 1 & 8)
- 14 17. Mohamed Anis Hemdani;  
15 (Counts 1 & 8)
- 16 18. Mounir Midani Daly;  
(Counts 1 & 8)
- 17 19. Rami Mahmoud Awwad;  
18 (Counts 1 & 8)
- 19 20. Sharif Kader Hamdan;  
(Counts 1 & 8)
- 20 21. Kamel Hamid Al-Fadheli;  
21 (Counts 1 & 8)
- 22 22. Nidal Mohammad Al-Shendi;  
(Counts 1 & 8)
- 23 23. Martha Ann Colwell;  
24 (Counts 1 & 8)
- 25 24. Sharon Faye King;  
(Counts 1 & 8)
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1 25. Slimane Hamzaoui;  
2 aka Sliman;  
(Counts 1 & 8)

3 26. Ibrahim Hassan Elrawy;  
4 aka Effrain;  
(Counts 1 & 8)

5 27. Alaa Ghassoub Obeid  
6 (Counts 1 & 8)

7 Defendants.

8 THE GRAND JURY CHARGES:

9 COUNT 1

10 From on or about December 17, 1997, until the present, the exact dates are unknown, in the  
11 District of Arizona, and other places, known and unknown to the Grand Jury, SAMIH FADL  
12 JAMAL, TAMER FAYEZ SWAILEM, MARWAN FADL JAMAL, ABDULRAZZAK FADL  
13 JAMAL, RAMY FADL JAMAL, MAMOUN AL-JAMAL, WALID FADL JAMAL, HANI  
14 JAMAL SARAWAN, SAAD TOMA YOHANAN, ABDUL KHADER KHALED HAMZE,  
15 AHMAD MY ALHULAISI, KAHLED AHMAD NOAMAN, AHMED MOHAMED ASHRY,  
16 MUSTAPHA MOHAMAD KHODR, FADEL HINDI, ABDELSALAM MOHAMAD  
17 ABDELSALAM, MOHAMED ANIS HEMDANI, MOUNIR MIDANI DALY, RAMI  
18 MAHMOUD AWWAD, SHARIF KADER HAMDAN, KAMEL HAMID AL-FADHELI,  
19 NIDAL MOHAMMAD AL-SHENDI, MARTHA ANN COLWELL, SHARON FAYE KING,  
20 SLIMANE HAMZAQOUI, IBRAHIM HASSAN ELRAWY, ALAA GHASSOUB OBEID  
21 defendants herein, conspired and agreed with other persons known and unknown to the Grand  
22 Jury, to commit offenses against the United States, that is, the receipt and transportation in  
23 interstate commerce of goods, that is, cases of infant formula, valued at more than \$5,000, which  
24 goods were then known to them to be stolen, including within the meaning of 18 U.S.C. § 21, in  
25 violation of Title 18, United States Code Sections 2314 and 2315.  
26  
27  
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1       3.    On March 7, 1998, Hani Jamal Sarawan shoplifted infant formula from Wal-Mart, 8200  
2 W. Peoria, Peoria, Arizona.

3       4.    On June 22, 1998, Ahmad My Alhulaisi shoplifted infant formula from Safeway  
4 Grocery Store, 450 White Spar Road, Prescott, Arizona.

5       5.    On October 31, 1999, Mohamed Anis Hemdani and Monir Daly, shoplifted infant  
6 formula from Safeway Grocery Store, 1225 W. Guadalupe Rd, Mesa, Arizona.

7       6.    On February 15, 2000, Hani Jamal Sarawan shoplifted infant formula from Fry's  
8 Grocery Store, 5127 W. Indian School Rd, Phoenix, Arizona.

9       7.    At or about April, 2000, Samih Fadl Jamal opened an American Express Corporate  
10 credit card account 3715-3135-55-01003 in the name of Samih Jammal/Jammal Trading  
11 Company.

12       8.    On July 14, 2000, a relative and employee of Sharif Kader Hamdan's purchased  
13 represented stolen infant formula from an undercover officer at the Ballpark Quickstop, 1025 N.  
14 7th Street.

15       9.    On August 8, 2000, Sharif Kader Hamdan agreed to purchase stolen infant formula from  
16 an Undercover Officer.

17       10.   On August 26, 2000, Rami M. Awwad and Laura Michelle Early, utilizing a white 2000  
18 Chevrolet van Illinois license 2086-XE registered to Laura M. Early, shoplifted infant formula  
19 from Walmart, 2300 Sycamore Rd, Dekalb, Illinois.

20       11.   At or about October, 2000, Samih Fadl Jamal added Abdul R. Jamal, AKA Abdulrazzak  
21 Fadl Jamal as an authorized user for the Jamal Trading Company American Express corporate  
22 credit card account.

23       12.   On or about November, 2000, Samih Fadl Jamal added Marwan Fadl Jamal as an  
24 authorized user for the Jamal Trading Company American Express corporate credit card account.

25       13.   On January 19, 2001, Samih Fadl Jamal completed a Federal Food Stamp Application  
26 for Stores, Form FCS-252, for the purpose of obtaining authorization for the Arizona Nutrition  
27 Store #1, 4419 E. Main St, Suite 107, Mesa, Arizona, to distribute infant formula through the  
28

1 WIC program.

2 14. On or about January 30, 2001, Samih Fadi Jamal and Tamer Fayed Swaleem commenced  
3 doing business as Arizona Nutrition Store #1, 4419 E. Main St, Suite 107, Mesa, Arizona.

4 15. On February 1, 2001, Rami Fadi Jamal applied for and received a Garden Grove,  
5 California, city business license for the R J Grocery Trading, 12821 Western Ave., Suite E,  
6 Garden Grove, California.

7 16. On February 12, 2001, Marwan Fadi Jamal changed universal price code "UPC" labels  
8 on cans of infant formula to fraudulently obtain the formula at a reduced price at Walmart, 2450  
9 W. Loop 338, Odessa, Texas.

10 17. On May 19, 2001, Abdul Khader Hamze, shoplifted infant formula from Walmart, in  
11 Greensboro, North Carolina.

12 18. On May 29, 2001, Samih Fadi Jamal co-signed a lease application for the Sonoran  
13 Ridge Apartments, apt. #123, 1205 E. Apache Blvd, Tempe, Arizona, for Khaled Ahmad Noaman  
14 and Alaa Ghassoub Obeid.

15 19. On June 1, 2001, Marwan Fadi Jamal shoplifted infant formula from Wal-Mart, 401 E.  
16 Highway 82, Sherman, Texas.

17 20. On June 5, 2001, Khaled Ahmad Noaman and Walid Jamal obtained infant formula by  
18 fraud at Walmart, 4517 North Midland Drive, Midland, Texas, through the utilization of a  
19 competitor price match scheme.

20 21. On August 3, 2001, Mohamed Anis Hemdani and Mounir Midani Daly shoplifted infant  
21 formula at the Albertson's grocery store in Lake Oswego, Oregon.

22 22. On August 8, 2001, Kamel Al-Fadheli shoplifted infant formula at the K-Mart store,  
23 4225 W. Indian School Road, Phoenix, Arizona.

24 23. On October 2, 2001, Samih Fadi Jamal and Ahmad Ashry transported infant formula.

25 24. On October 12, 2001, Marwan Fadi Jamal attempted to obtain infant formula by fraud  
26 by utilizing a competitor's price match scheme at the Wal-Mart, in Sulphur Springs, Texas.

27 25. On November 14, 2001, Samih Fadi Jamal co-signed the lease for apartment #2077 of  
28

1 the Sun River Apartments, 505 W. Baseline Road, Tempe, Arizona, for Khaled Noaman and  
2 Abdulrazzak Jamal.

3 26. On December 4, 2001, Salvadore Valladores, an employee of Ramy Jamal and the RJ  
4 Grocery Trading Co., rented two storage units at Public Storage in Tigard, Oregon to store  
5 quantities of infant formula.

6 27. On December 6, 2001, Tamer Fayez Swailem and Ahmed Mohamad Ashry purchased  
7 258 cases of represented stolen infant formula from an undercover detective for \$8,605.00.

8 28. On December 6, 2001, Ahmed Mohamed Ashry and Tamer Fayez Swailem delivered  
9 represented stolen infant formula to the Jamal Trading Company.

10 29. On January 10, 2002, Tamer Fayez Swailem engaged in a telephone conversation with  
11 an undercover detective and agreed to purchase infant formula.

12 30. On January 15, 2002, Tamer Fayez Swailem purchased 288 cases of represented stolen  
13 infant formula from an undercover detective for \$10,368.00.

14 31. On January 15, 2002, Tamer Fayez Swailem delivered represented stolen infant formula  
15 to the Arizona Nutrition Store #2, 19401 N. Cave Creek Road, Phoenix, Arizona.

16 32. On January 26, 2002, Marwan Fadl Jamal attempted to obtain infant formula by fraud  
17 utilizing a competitor's price match scheme at the Wal-Mart Supercenter, in Kirksville, Missouri.

18 33. On January 26, 2002, Marwan Fadl Jamal also attempted to shoplift two shopping carts  
19 full of infant formula.

20 34. On March 13, 2002, Tamer Fayez Swailem engaged in a telephone conversation with  
21 an undercover detective and agreed to purchase infant formula.

22 35. On March 14, 2002, Tamer Fayez Swailem cashed a check in the amount of \$7,000.00  
23 from the Jamal Trading Company Wells Fargo business account.

24 36. On March 14, 2002, Tamer Fayez Swailem and Ahmed Mohamed Ashry purchased 210  
25 cases of represented stolen infant formula from an undercover detective for \$6,721.00.

26 37. On March 26, 2002, Ahmad My Alhulaisi transported infant formula.

27 38. On April 25, 2002, Martha Colwell and Sharon Faye King, utilizing a red Dodge Neon  
28

1 AZ license 740-GVK registered to Martha Colwell, delivered infant formula to the Jamal Trading  
2 Company.

3 39. On April 29, 2002, Martha Colwell and Sharon Faye King, utilizing a red Dodge Neon  
4 AZ license 740-GVK registered to Martha Colwell, delivered infant formula to the Jamal Trading  
5 Company.

6 40. On May 2, 2002, Samih Fadl Jamal completed Form FNS-252, U.S. Department of  
7 Agriculture, Food Stamp Program for Stores Application.

8 41. On May 7, 2002, Tamer Fayeز Swailem engaged in a telephone conversation with an  
9 undercover detective and agreed to purchase infant formula.

10 42. On May 8, 2002, Tamer Fayeز Swailem, and Ahmed Mohamed Ashry purchased 120  
11 cases of represented stolen infant formula from an undercover detective for \$3,600.00.

12 43. On May 8, 2002, Tamer Fayeز Swailem and Ahmed Mohamed Ashry delivered  
13 represented stolen infant formula to the Jamal Trading Company.

14 44. On or about May 8, 2002, Laura M. Early provided her vehicle, a white 2000 Chevrolet  
15 van Illinois license 2086-XE registered to Laura M. Early, to Ahmad My Alhulaisi for use in the  
16 transportation of infant formula.

17 45. On May 11, 2002, Martha Colwell and Sharon Faye King delivered infant formula to  
18 the Jamal Trading Company.

19 46. On May 12, 2002, Abdul Khader Hamze, purchased infant formula utilizing fraudulent  
20 price matching scheme in Evanston, Wyoming.

21 47. On May 14, 2002, Tamer Fayeز Swailem engaged in a telephone conversation with an  
22 undercover detective and agreed to purchase infant formula.

23 48. On May 15, 2002, Tamer Fayeز Swailem, Ahmed Mohamed Ashry, Abdulrazzak Fadl  
24 Jamal, and Moustapha Khodr purchased 1,440 cases of represented stolen infant formula in  
25 Quartzite, Arizona for an agreed amount of \$43,500.00.

26 49. On May 15, 2002, Samih Fadl Jamal, Tamer Fayeز Swailem, Ahmed Mohamed Ashry,  
27 Abdulrazzak Fadl Jamal, and Moustapha Khodr removed and discarded all Wal-Mart labels,  
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1 insignias, markings and manufacturer's packaging materials from the 1,440 cases of represented  
2 stolen infant formula, and re-packaged the represented stolen infant formula.

3 50. On May 16, 2002, Tamer Fayez Swailem and Moustapha Khodr transported represented  
4 stolen infant formula in interstate commerce from the Jamal Trading Company, Tempe, Arizona  
5 to the RJ Grocery Trading, Garden Grove, California.

6 51. On May 17, 2002, Sharon Faye King delivered infant formula to the Jamal Trading  
7 Company utilizing a red Dodge Neon, license AZ 740GVK registered to Martha Colwell

8 52. On May 20, 2002, Abdul Khader Hamze, attempted to purchase infant formula utilizing  
9 a fraudulent price matching scheme in Rock Springs, Wyoming.

10 53. On May 23, 2002, Samih Fadl Jamal cashed a check in the amount of \$5,000.00 from  
11 the Jamal Trading Company Wells Fargo business account.

12 54. On May 23, 2002, Tamer Fayez Swailem paid an undercover detective \$5,000.00 in  
13 cash as partial payment for represented stolen infant formula purchased on May 15, 2002.

14 55. On May 24, 2002, Tamer Fayez Swailem and Samih Fadl Jamal obtained \$10,000.00  
15 in cash from the Jamal Trading Company Wells Fargo business account.

16 56. On May 24, 2002, Tamer Fayez Swailem paid an undercover detective \$10,000.00 in  
17 cash as partial payment for the represented stolen infant formula purchased on May 15, 2002.

18 57. On May 29, 2002, Samih Fadl Jamal cashed a check in the amount of \$25,000.00 from  
19 the Jamal Trading Company Wells Fargo business account.

20 58. On May 29, 2002, Slimane Hamzaoui, dba. The Drean Corp., received a quantity of  
21 infant formula from Henry Contreras at Tex-Mex Trading, in Houston, Texas.

22 59. On May 29, 2002, Slimane Hamzaoui transported infant formula.

23 60. On May 31, 2002, Tamer Fayez Swailem paid an undercover detective \$20,500.00 in  
24 cash, the balance due, for the the represented stolen infant formula purchased on May 15, 2002.

25 61. On June 3, 2002, Martha Colwell and Sharon Faye King, utilizing a red Dodge Neon  
26 AZ license 740-GVK registered to Martha Colwell, delivered infant formula to the Jamal Trading  
27 Company.

1       62. On June 4, 2002, Sharif Kader Hamdan delivered infant formula to the Jamal Trading  
2 Company driving a white 2001 Honda AZ license 075-GKW registered to Sharif Hamdan.

3       63. On June 13, 2002, Samih Fadl Jamal, Slimane Hamzaoui, and Ibrahim Elrawy, signed  
4 a business agreement. The agreement was notarized by Tamer Fayez Swailem.

5       64. On June 13, 2002, a check for the amount of \$50,000 was signed by Slimane Hamzaoui  
6 and deposited into the bank account of Ibrahim Elrawy.

7       65. On June 13, 2002, a check for the amount of \$50,000 was signed by Slimane Hamzaoui  
8 and deposited into the bank account of Ibrahim Elrawy.

9       66. On June 19, 2002, Abdul Khader Hamze, attempted to purchase infant formula utilizing  
10 a fraudulent price matching scheme at a Wal-Mart in Great Falls, Montana.

11       67. On June 22, 2002, Martha Colwell and Sharon Faye King, utilizing a red Dodge Neon  
12 AZ license 740-GVK registered to Martha Colwell, delivered stolen infant formula to the Jamal  
13 Trading Company.

14       68. On June 28, 2002, Martha Colwell and Sharon Faye King, utilizing a maroon Chevrolet  
15 pickup truck AZ license 442-GEP registered to Martha Colwell, delivered infant formula to the  
16 Jamal Trading Company.

17       69. On July 2, 2002, Martha Colwell and Sharon Faye King purchased six cans of  
18 represented stolen infant formula from an undercover detective for \$30.00 in cash at the Nice  
19 Twice store, 2647 W. Bethany Home Road, Phoenix, Arizona.

20       70. On July 3, 2002, Slimane Hamzaoui delivered infant formula to the Jamal Trading  
21 Company.

22       71. On July 8, 2002, Khaled Noaman, utilizing a 1997 Dodge Caravan AZ license 596-HEJ,  
23 registered to Khaled Noaman, delivered infant formula to the Jamal Trading Company.

24       72. On July 9, 2002, Martha Colwell and Sharon Faye King, utilizing a 2001 maroon  
25 Chevrolet Silverado truck AZ 442-GEP registered to Martha Colwell, delivered infant formula  
26 to the Jamal Trading Company.

27       73. On July 26, 2002, Martha Colwell and Sharon Faye King purchased six cans of  
28

1 represented stolen infant formula from an undercover detective for \$30.00 in cash at the Nice  
2 Twice store, 2647 W. Bethany Home Road, Phoenix, Arizona.

3 74. On July 29, 2002, Fadel Hindi delivered infant formula to the Jamal Trading Company  
4 utilizing a 1993 red GEO, AZ 900-JCT, registered to Fadel Hindi.

5 75. On July 29, 2002, Abdelsalam Abdelsalam delivered infant formula to the Jamal  
6 Trading Company utilizing a 1999 Ford Expedition, AZ 242-FGB, registered to Cheryl and Scott  
7 Fisher.

8 76. On July 30, 2002, Sharif Hamdan delivered infant formula to the Jamal Trading  
9 Company.

10 77. On July 30, 2002, Abdelsalam Abdelsalam delivered infant formula to the Jamal  
11 Trading Company utilizing a 1999 Ford Expedition, AZ 242-FGB, registered to Cheryl and Scott  
12 Fisher.

13 78. On July 31, 2002, Fadel Hindi and Abdelsalam Abdelsalam delivered infant formula  
14 to the Jamal Trading Company utilizing a 1993 red GEO, AZ 900-JCT, registered to Fadel Hindi.

15 79. On August 1, 2002, Fadel Hindi and an accomplice, stole infant formula from the Wal-  
16 Mart, 1955 S. Stapley Drive, Mesa, Arizona.

17 80. On August 1, 2002, Fadel Hindi, Abdelsalam Abdelsalam, and an accomplice stole  
18 infant formula from the Wal-Mart, 6131 E. Southern Avenue, Mesa, Arizona.

19 81. On August 1, 2002, Fadel Hindi and Abdelsalam Abdelsalam delivered stolen infant  
20 formula to the Jamal Trading Company utilizing a 1993 red GEO, AZ 917-JHW, registered to  
21 Fadel Hindi.

22 82. On August 5, 2002, Martha Colwell delivered infant formula to the Jamal Trading  
23 Company utilizing a maroon Chevrolet Silverado truck, license AZ 442GEP.

24 83. On August 7, 2002, Sharif Hamdan, utilizing a white 2001 Honda AZ license 075-GKW  
25 registered to Sharif Hamdan, delivered infant formula to the Jamal Trading Company.

26 84. On August 7, 2002, Abdelsalam Abdelsalam delivered infant formula to the Jamal  
27 Trading Company utilizing a 1999 Ford Expedition, AZ 242-FGB, registered to Cheryl and Scott  
28

1 Fisher.

2 85. On August 8, 2002, Fadel Hindi and accomplices, delivered infant formula to the Jamal  
3 Trading Company utilizing a 1993 red GEO, AZ 917-JHW, registered to Fadel Hindi.

4 86. On or about August 8, 2002, Nidal Al-Shendi directed an accomplice to shoplift infant  
5 formula.

6 87. On August 9, 2002, Martha Colwell and Sharon Faye King, utilizing a maroon 2001  
7 Chevrolet Silverado truck AZ license 442-GEP registered to Martha Colwell, delivered infant  
8 formula to the Jamal Trading Company.

9 88. On August 12, 2002, Abdelsalam Abdelsalam delivered infant formula to the Jamal  
10 Trading Company utilizing a 1999 Ford Expedition, AZ 242-FGB, registered to Cheryl and Scott  
11 Fisher.

12 89. On August 13, 2002, Martha Colwell, utilizing a red 2000 Dodge Neon AZ license 740-  
13 GVK registered to Martha Colwell, delivered infant formula to the Jamal Trading Company.

14 90. On August 13, 2002, Abdelsalam Abdelsalam delivered infant formula to the Jamal  
15 Trading Company utilizing a 1998 Jeep Grand Cherokee, AZ 902-HBB, registered to Cheryl  
16 Fisher.

17 91. On August 13, 2002, Fadel Hindi and an accomplice shoplifted infant formula from the  
18 Wal-Mart, 8200 W. Peoria, Peoria, Arizona.

19 92. On August 13, 2002, Fadel Hindi and an accomplice shoplifted infant formula from the  
20 Safeway, 67th Avenue and Peoria, Peoria, Arizona.

21 93. On August 13, 2002, Fadel Hindi delivered stolen infant formula to the Jamal Trading  
22 Company utilizing a 1993 red GEO, AZ 900-JCT, registered to Fadel Hindi.

23 94. On August 13, 2002, Sharif Hamdan, utilizing a white 2001 Honda AZ license 075-  
24 GKW registered to Sharif Hamdan, delivered infant formula to the Jamal Trading Company.

25 95. On August 13, 2002, Fadel Hindi and accomplices shoplifted infant formula from Wal-  
26 mart, 2020 N. 75th Ave., Phoenix, Arizona.

27 96. On August 14, 2002, Allah Obeid transported infant formula in Lufkin, TX.

28 97. On August 15, 2002, Fadel Hindi delivered infant formula to the Jamal Trading

1 Company utilizing a 1993, red GEO, AZ 917-JHW, registered to Fadel Hindi.

2 98. On August 16, 2002, Martha Colwell and Sharon Faye King, utilizing a red 2000 Dodge  
3 Neon AZ license 740-GVK registered to Martha Colwell, delivered stolen infant formula to the  
4 Jamal Trading Company.

5 99. On August 17, 2002, Abdelsalam Abdelsalam delivered infant formula to the Jamal  
6 Trading Company.

7 100. On August 17, 2002, Mustapha Khodr delivered infant formula to the Jamal Trading  
8 Company utilizing a 1997 black Nissan Sentra, license AZ 930BJM, registered to Christine  
9 Anderson-Khodr.

10 101. On August 19, 2002, Abdelsalam Abdelsalam, utilizing a green 1999 Ford Expedition  
11 AZ license 242-FGB registered to Cheryl and Scott Fisher, delivered infant formula to the Jamal  
12 Trading Company.

13 102. On August 19, 2002, Sharif Kader Hamdan, utilizing a white 2001 Honda AZ license  
14 075-GKW registered to Sharif Hamdan, delivered infant formula to the Jamal Trading Company.

15 103. On August 20, 2002, Abdelsalam Abdelsalam, utilizing a green 1999 Ford Expedition  
16 AZ license 242-FGB registered to Cheryl and Scott Fisher, delivered infant formula to the Jamal  
17 Trading Company.

18 104. On August 21, 2002, Martha Colwell and Sharon Faye King, utilizing a maroon 2001  
19 Chevrolet Silverado truck AZ license 442-GEP registered to Martha Colwell, delivered infant  
20 formula to the Jamal Trading Company.

21 105. On August 21, 2002, Fadel Hindi, utilizing a white Jeep Cherokee, delivered infant  
22 formula to the Jamal Trading Company.

23 106. On August 26, 2002, Abdelsalam Abdelsalam, utilizing a green 1999 Ford Expedition  
24 AZ license 242-FGB registered to Cheryl and Scott Fisher, delivered infant formula to the Jamal  
25 Trading Company.

26 107. On August 26, 2002, Slimane Hamzaoui delivered infant formula to the Jamal Trading  
27 Company utilizing a white Chevrolet van, 989-GZC.

28 108. On August 27, 2002, Martha Colwell and Sharon Faye King, utilizing a maroon 2001

1 Chevrolet Silverado truck AZ license 442-GEP registered to Martha Colwell, delivered infant  
2 formula to the Jamal Trading Company.

3 109. On August 28, 2002, Abdelsalam Abdelsalam, utilizing a green 1999 Ford Expedition  
4 AZ license 242-FGB registered to Cheryl and Scott Fisher, delivered infant formula to the Jamal  
5 Trading Company.

6 110. On August 29, 2002, Fadel Hindi and an accomplice shoplifted infant formula at Fry's,  
7 51st Avenue and Olive, Glendale, Arizona.

8 111. On August 29, 2002, Fadel Hindi and an accomplice shoplifted infant formula at Fry's,  
9 8325 W. Indian School, Phoenix, Arizona.

10 112. On August 29, 2002, Fadel Hindi and an accomplice shoplifted infant formula at Fry's,  
11 10659 NW Grand, Peoria, Arizona.

12 113. On August 30, 2002, Martha Colwell and Sharon Faye King, utilizing a red 2000 Dodge  
13 Neon AZ license 740- GWK registered to Martha Colwell, delivered infant formula to the Jamal  
14 Trading Company.

15 114. On August 30, 2002, Fadel Hindi and an accomplice shoplifted infant formula at Wal-  
16 Mart, 13055 Rancho Sante Fe Blvd., Avondale, Arizona.

17 115. On August 30, 2002, Fadel Hindi and an accomplice shoplifted infant formula at Wal-  
18 Mart, 1955 S. Stapley, Mesa, Arizona.

19 116. On September 2, 2002, Abdelsalam Abdelsalam, utilizing a green 1999 Ford  
20 Expedition AZ license 242-FGB registered to Cheryl and Scott Fisher, delivered infant formula  
21 to the Jamal Trading Company.

22 117. On September 3, 2002, Abdul Kader Hamze delivered infant formula to the Jamal  
23 Trading Company.

24 118. On September 3, 2002, Khaled Noaman, utilizing a 1997 Dodge Caravan AZ license  
25 596-HEJ registered to Khaled Noaman, delivered infant formula to the Jamal Trading Company.

1 119. On September 5, 2002, Martha Colwell and Sharon Faye King, utilizing a maroon 2001  
2 Chevrolet Silverado truck AZ licene 442-GEP registered to Martha Colwell, delivered infant  
3 formula to the Jamal Trading Company.

4 120. On September 5, 2002, Fadel Hindi and an accomplice shoplifted infant formula from  
5 Wal-Mart, 13055 Rancho Sante Fe Blvd., Avondale, Arizona.

6 121. On September 5, 2002, Abdelsalam Abdelsalam delivered infant formula to the Jamal  
7 Trading Company utilizing a 1999 Ford Expedition, license AZ 242FGB.

8 122. On October 3, 2002 Fadel Hindi delivered infant formula to the Jamal Trading  
9 Company utilizing a white Jeep Cherokee.

10 123. On October 7, 2002 Fadel Hindi delivered infant formula to the Jamal Trading  
11 Company utilizing a white Jeep Cherokee.

12 124. On October 12, 2002, Allah Obeid and Abdul Hamze obtained infant formula from a  
13 Wal-Mart, Scottsdale, Arizona.

14 125. On October 21, 2002, Sharif Hamdan, utilizing a white 2001 Honda AZ license 075-  
15 GKW registered to Sharif Hamdan, delivered infant formula to the Jamal Trading Company.

16 126. On October 22, 2002, Abdelsalam Abdelsalam delivered infant formula to the Jamal  
17 Trading Company utilizing a Jeep Grand Cherokee, AZ 902-HBB registered to Cheryl Fisher.

18 127. On October 22, 2002, Khaled Noaman delivered infant formula to the Jamal Trading  
19 Company.

20 128. On October 22, 2002, Martha Colwell and Sharon Faye King, utilizing a maroon 2001  
21 Chevrolet Silverado truck AZ license 442-GEP registered to Martha Colwell, delivered infant  
22 formula to the Jamal Trading Company.

23 129. On October 23, 2002 Fadel Hindi delivered infant formula to the Jamal Trading  
24 Company utilizing a white Jeep Cherokee.

25 130. On October 24, 2002 Fadel Hindi delivered infant formula to the Jamal Trading  
26 Company utilizing a white Jeep Cherokee, AZ 612-JNP, registered Fadel Hindi.

1 131. On October 24, 2002, Abdelsalam Abdelsalam delivered infant formula to the Jamal  
2 Trading Company utilizing a 1999 Ford Expedition, AZ 242-FGB, registered to Cheryl and Scott  
3 Fisher.

4 132. On October 24, 2002, Khaled Noaman, utilizing a 1997 Dodge Caravan AZ license 596-  
5 HEJ registered to Khaled Noaman, delivered infant formula to the Jamal Trading Company.

6 133. On October 25, 2002, Sharif Hamdan, utilizing a white 2001 Honda AZ license 075-  
7 GKW registered to Sharif Hamdan, delivered infant formula to the Jamal Trading Company.

8 134. On October 25, 2002, Abdelsalam Abdelsalam delivered infant formula to the Jamal  
9 Trading Company utilizing a 1999 Ford Expedition, AZ 242-FGB, registered to Cheryl and Scott  
10 Fisher.

11 135. On October 29, 2002, Abdelsalam Abdelsalam delivered infant formula to the Jamal  
12 Trading Company utilizing a 1999 Ford Expedition, AZ 242-FGB, registered to Cheryl and Scott  
13 Fisher.

14 136. On October 29, 2002 Fadel Hindi delivered infant formula to the Jamal Trading  
15 Company utilizing a white Jeep Cherokee, AZ 612-JNP, registered Fadel Hindi.

16 137. On October 29, 2002, Martha Colwell and Sharon Faye King, utilizing a maroon 2001  
17 Chevrolet Silverado truck AZ license 442-GEP registered to Martha Colwell, delivered infant  
18 formula to the Jamal Trading Company.

19 138. On October 29, 2002, Nidal Alshendi delivered infant formula to the Jamal Trading  
20 Company utilizing a maroon 1995 Dodge Caravan, license AZ 396HWM, registered to Concorde  
21 Enterprise Incorporated.

22 139. On October 30, 2002 Fadel Hindi delivered infant formula to the Jamal Trading  
23 Company utilizing a white Jeep Cherokee, AZ 612-JNP, registered Fadel Hindi.

24 140. On October 30, 2002, John Doe purchased represented stolen infant formula from an  
25 undercover detective at the Dollar Store and Meat, 1109 W. Hatcher, Phoenix, Arizona.

26 141. On October 31, 2002, John Doe purchased cans of represented stolen infant formula  
27



1 from an undercover detective at the Dollar Store and Meat, 1109 W. Hatcher, Phoenix, Arizona.

2 142. On October 31, 2002, Martha Colwell and Sharon Faye King purchased cans of  
3 represented stolen infant formula from an undercover detective.

4 143. On November 6, 2002, Abdelsalam Abdelsalam and accomplices shoplifted infant  
5 formula from Walmart, 3721 E. Thomas, Phoenix, Arizona.

6 144. On November 8, 2002, Abdelsalam Abdelsalam delivered infant formula to the Jamal  
7 Trading Company utilizing a Jeep Grand Cherokee, AZ 902-HBB registered to Cheryl Fisher.

8 145. On November 9, 2002, Abdelsalam Abdelsalam delivered infant formula to the Jamal  
9 Trading Company utilizing a 1999 Ford Expedition, AZ 242-FGB, registered to Cheryl and Scott  
10 Fisher.

11 146. On November 13, 2002, Martha Colwell and Sharon Faye King, utilizing a maroon  
12 2001 Chevrolet Silverado truck AZ license 442-GEP registered to Martha Colwell, delivered  
13 infant formula to the Jamal Trading Company.

14 147. On November 18, 2002 Fadel Hindi delivered infant formula to the Jamal Trading  
15 Company utilizing a white Jeep Cherokee, AZ 612-JNP, registered Fadel Hindi.

16 148. On November 18, 2002, Abdelsalam Abdelsalam delivered infant formula to the Jamal  
17 Trading Company utilizing a 1999 Ford Expedition, AZ 242-FGB, registered to Cheryl and Scott  
18 Fisher.

19 149. On November 19, 2002, Abdelsalam Abdelsalam delivered infant formula to the Jamal  
20 Trading Company utilizing a 1999 Ford Expedition, AZ 242-FGB, registered to Cheryl and Scott  
21 Fisher.

22 150. On November 19, 2002, Martha Colwell and Sharon Faye King, utilizing a maroon  
23 2001 Chevrolet Silverado truck AZ license 442-GEP registered to Martha Colwell, delivered  
24 stolen infant formula to the Jamal Trading Company.

25 151. On November 19, 2002, Slimane Hamzaoui delivered infant formula to the Jamal  
26 Trading Company.

1 152. On November 20, 2002 Fadel Hindi delivered infant formula to the Jamal Trading  
2 Company utilizing a white Jeep Cherokee, AZ 612-JNP, registered Fadel Hindi.

3 153. On November 20, 2002, Abdelsalam Abdelsalam delivered infant formula to the Jamal  
4 Trading Company utilizing a 1999 Ford Expedition, AZ 242-FGB, registered to Cheryl and Scott  
5 Fisher.

6 154. On November 21, 2002 Fadel Hindi delivered infant formula to the Jamal Trading  
7 Company utilizing a white Jeep Cherokee, AZ 612-JNP, registered Fadel Hindi.

8 155. On November 25, 2002, Abdelsalam Abdelsalam delivered infant formula to the Jamal  
9 Trading Company utilizing a 1999 Ford Expedition, AZ 242-FGB, registered to Cheryl and Scott  
10 Fisher.

11 156. On November 27, 2002, Abdelsalam Abdelsalam delivered infant formula to the Jamal  
12 Trading Company utilizing a Jeep Grand Cherokee, AZ 902-HBB registered to Cheryl Fisher.

13 157. On November 27, 2002 Fadel Hindi delivered infant formula to the Jamal Trading  
14 Company utilizing a white Jeep Cherokee, AZ 612JNP, registered Fadel Hindi.

15 158. On November 29, 2002, Mohammad Anis Hemdani and Mounir Midani Daly shoplifted  
16 infant formula at Polly's Market, 1101 S. Main, Chelsea, Michigan.

17 159. On November 30, 2002, Abdelsalam Abdelsalam delivered infant formula to the  
18 Jamal Trading Company utilizing a 1999 Ford Expedition, AZ 242-FGB, registered to Cheryl and  
19 Scott Fisher.

20 160. On December 13, 2002, Martha Colwell and Sharon Faye King purchased sixty-six cans  
21 of represented stolen infant formula from an undercover detective.

22 161. On December 17, 2002, Abdelsalam Abdelsalam delivered infant formula to the Jamal  
23 Trading Company.

24 162. On December 18, 2002, Abdelsalam Abdelsalam delivered infant formula to the Jamal  
25 Trading Company utilizing a 1999 Ford Expedition, AZ 242-FGB, registered to Cheryl and Scott  
26 Fisher.

1 163. On December 23, 2002, Martha Colwell and Sharon Faye King, utilizing a maroon 2001  
2 Chevrolet Silverado truck AZ license 442-GEP registered to Martha Colwell, delivered infant  
3 formula to the Jamal Trading Company.

4 164. On December 23, 2002, Abdelsalam Abdelsalam delivered infant formula to the Jamal  
5 Trading Company utilizing a 1999 Ford Expedition, AZ 242-FGB, registered to Cheryl and Scott  
6 Fisher.

7 165. On December 26, 2002, Abdelsalam Abdelsalam delivered infant formula to the Jamal  
8 Trading Company utilizing a 1999 Ford Expedition, AZ 242-FGB, registered to Cheryl and Scott  
9 Fisher.

10 166. On December 28, 2002, Martha Colwell and Sharon Faye King, utilizing a maroon 2001  
11 Chevrolet Silverado truck AZ license 442-GEP registered to Martha Colwell, delivered infant  
12 formula to the Jamal Trading Company.

13 167. On December 31, 2002, Abdelsalam Abdelsalam delivered infant formula to the Jamal  
14 Trading Company utilizing a 1999 Ford Expedition, AZ 242-FGB, registered to Cheryl and Scott  
15 Fisher.

16 168. On January 3, 2003, Martha Colwell and Sharon Faye King, utilizing a maroon 2001  
17 Chevrolet Silverado AZ license 442-GEP registered to Martha Colwell delivered infant formula  
18 to the Jamal Trading Company.

19 169. On January 3, 2003, Abdelsalam Abdelsalam and Cheryl Fisher delivered infant  
20 formula to the Jamal Trading Company utilizing a 1999 Ford Expedition, AZ 242-FGB,  
21 registered to Cheryl and Scott Fisher.

22 170. On January 4, 2003, Abdelsalam Abdelsalam delivered infant formula to the Jamal  
23 Trading Company utilizing a 1999 Ford Expedition, AZ 242-FGB, registered to Cheryl and Scott  
24 Fisher.

25 171. On January 5, 2003, Abdelsalam Abdelsalam delivered infant formula to the Jamal  
26 Trading Company utilizing a 1999 Ford Expedition, AZ 242-FGB, registered to Cheryl and Scott  
27

1 Fisher.

2 172. On January 6, 2003, Abdelsalam Abdelsalam delivered infant formula to the Jamal  
3 Trading Company utilizing a 1999 Ford Expedition, AZ 242-FGB, registered to Cheryl and Scott  
4 Fisher.

5 173. On January 8, 2003, Mustapha Khodr delivered infant formula to the Jamal Trading  
6 Company utilizing a 1998 Ford Mustang, license AZ 785KAT, registered to Christine and  
7 Mustapha Khodr.

8 174. On January 9, 2003, Martha Colwell and Sharon Faye King, utilizing a maroon 2001  
9 Chevrolet Silverado truck AZ license 442-GEP registered to Martha Colwell, delivered infant  
10 formula to the Jamal Trading Company.

11 175. On January 15, 2003, Slimane Hamzaoui received infant formula at the Jamal Trading  
12 Company utilizing a white Chevrolet van, license AZ 989GZC, registered to Slimane Hamzaoui.

13 176. On January 16, 2003, Abdelsalam Abdelsalam delivered infant formula to the Jamal  
14 Trading Company utilizing a 1999 Ford Expedition, AZ 242-FGB, registered to Cheryl and Scott  
15 Fisher.

16 177. On January 17, 2003, Martha Colwell, utilizing a maroon 2001 Chevrolet Silverado  
17 truck AZ license 442-GEP registered to Martha Colwell, delivered infant formula to the Jamal  
18 Trading Company.

19 178. On January 22, 2003, 2 pallets of infant were shipped from ENA, Houston, Texas to  
20 Jamal Trading Company via ABF Freight System, Inc. Tamer Swailem signed the bill of lading  
21 as the "shipper".

22 179. On January 24, 2003, Abdelsalam Abdelsalam, utilizing a Jeep Grand Cherokee Arizona  
23 license 902-HBB, delivered infant formula to the Jamal Trading Company.

24 180. On January 27, 2003, Abdelsalam Abdelsalam, utilizing a green 1999 Ford Expedition  
25 AZ license 242-FGB registered to Cheryl and Scott Fisher, delivered infant formula to the Jamal  
26 Trading Company.

27 181. On February 1, 2003, Nidal Alshendi delivered infant formula to the Jamal Trading  
28 Company utilizing a maroon 1995 Dodge Caravan, license AZ 396HWM, registered to Concord

Enterprise Incorporated.

182. On February 1, 2003, Abdelsalam Abdelsalam delivered infant formula to the Jamal Trading Company utilizing a 1999 Ford Expedition, AZ 242-FGB, registered to Cheryl and Scott Fisher.

183. On February 2, 2003, Abdelsalam Abdelsalam and accomplices shoplifted one hundred and forty cans of infant formula from the Wal-Mart, 8250 Razorback Road, Colorado Springs, Colorado.

184. On February 3, 2003, Martha Colwell, utilizing a maroon 2001 Chevrolet Silverado truck AZ license 442-GEP registered to Martha Colwell, delivered infant formula to the Jamal Trading Company.

185. On February 26, 2003, Martha Colwell, utilizing a maroon 2001 Chevrolet Silverado truck AZ license 442-GEP registered to Martha Colwell, delivered infant formula to the Jamal Trading Company

186. 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 Six.

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

## COUNT TWO

On or about May 15, 2002, in the District of Arizona, the defendants SAMIH FADL JAMAL, TAMER FAYEZ SWAILEM, AHMED MOHAMED ASHRY, ABDULRAZZAK FADL JAMAL, MOUSTAPHA MOHAMAD KHODR, RAMY JAMAL, and MAMOUN AL-JAMAL, and other persons known and unknown to the Grand Jury, aided and abetted by one another, and by other persons known and unknown to the Grand Jury, did receive, possess, conceal goods, that is, cases of infant formula, valued at \$5,000 or more, which were then known to be stolen, converted or taken by fraud, within the meaning of 18 U.S.C. §21.

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

1 COUNT THREE

2 On or about May 16, 2002, in the District of Arizona, the defendants SAMIH FADL  
3 JAMAL, TAMER FAYEZ SWAILEM, AHMED MOHAMED ASHRY, ABDULRAZZAK  
4 FADL JAMAL, MOUSTAPHA MOHAMAD KHODR, RAMY JAMAL, and MAMOUN AL-  
5 JAMAL, and other persons known and unknown to the Grand Jury, aided and abetted by one  
6 another, and by other persons known and unknown to the Grand Jury, did receive, possess,  
7 conceal goods, that is, cases of infant formula, valued at \$5,000 or more, which were then known  
8 to be stolen, converted or taken by fraud, within the meaning of 18 U.S.C. §21.

9 All in violation of Title 18, United States Code, Sections 2315 and 2.

10 COUNT FOUR

11 On or about May 16, 2002, in the District of Arizona and elsewhere, the defendants,  
12 SAMIH FADL JAMAL, TAMER FAYEZ SWAILEM, AHMED MOHAMED ASHRY,  
13 ABDULRAZZAK FADL JAMAL, MOUSTAPHA MOHAMAD KHODR, RAMY JAMAL,  
14 and MAMOUN AL-JAMAL, aided and abetted by one another, and by other persons, known and  
15 unknown to the grand jury, unlawfully transported, transmitted, and transferred in interstate  
16 commerce and caused to be transported, transmitted, and transferred in interstate commerce from  
17 Phoenix, Arizona to Garden Grove, California, goods, wares, merchandise of the value of \$5,000  
18 or more, that is, 960 cases of infant formula, knowing the same to have been stolen, converted,  
19 and taken by fraud, within the meaning of 18 U.S.C. §21.

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

21  
22 COUNT FIVE

23 On or about January 19, 2001, in the District of Arizona, in a matter within the jurisdiction  
24 of the United States Department of Agriculture, an agency of the United States, the Defendant  
25 SAMIH FADL JAMAL, did knowingly and willfully make a false, fraudulent, and fictitious  
26 material statement and representation; that is, on part 2 business ethics section of Form FNS-252,  
27 U.S. Department of Agriculture, Food Stamp Program for Stores Application, he falsely answered  
28 "No" when asked had he ever been previously convicted of a crime, knowing said answer to be

1 false.

2 All in violation of Title 18, United States Code, Section 1001.

3 **COUNT SIX**

4 On or about August 3, 2001, in the District of Arizona, in a matter within the jurisdiction of  
5 the United States Department of Agriculture, an agency of the United States, the Defendant  
6 SAMIH FADL JAMAL, did knowingly and willfully make a false, fraudulent, and fictitious  
7 material statement and representation; that is, on part 2 business ethics section of Form FNS-252,  
8 U.S. Department of Agriculture, Food Stamp Program for Stores Application, he falsely answered  
9 "No" when asked had he ever been previously convicted of a crime, knowing said answer to be  
10 false.

11 All in violation of Title 18, United States Code, Section 1001.

12 **COUNT SEVEN**

13 On or about May 2, 2002, in the District of Arizona, in a matter within the jurisdiction of the  
14 United States Department of Agriculture, an agency of the United States, the Defendant SAMIH  
15 FADL JAMAL, did knowingly and willfully make a false, fraudulent, and fictitious material  
16 statement and representation; that is, on part 2 business ethics section of Form FNS-252, U.S.  
17 Department of Agriculture, Food Stamp Program for Stores Application, he falsely answered  
18 "No" when asked had he ever been previously convicted of a crime, knowing said answer to be  
19 false.

20 All in violation of Title 18, United States Code, Section 1001.

21 **COUNT EIGHT**

22 From on or about a date in 1997, the exact dates are unknown to the Grand Jury, and  
23 continuing until the present, in the District of Arizona, and other places known and unknown to  
24 the Grand Jury, SAMIH FADL JAMAL, TAMER FAYEZ SWAILEM, MARWAN FADL  
25 JAMAL, ABDULRAZZAK FADL JAMAL, RAMY FADL JAMAL, MAMOUN AL-JAMAL,  
26 WALID FADL JAMAL, HANI JAMAL SARAWAN, SAAD TOMA YOHANAN, KHALED  
27 ABDUL KHADER HAMZE, AHMAD MY ALHULAISI, KAHLED AHMAD NOAMAN,  
28 AHMED MOHAMED ASHRY, MUSTAPHA MOHAMAD KHODR, FADEL HINDI,

1 ABDELSALAM MOHAMAD ABDELSALAM, MOHAMED ANIS HEMDANI, MOUNIR  
2 MIDANI DALY, RAMI MAHMOUD AWWAD, SHARIF KADER HAMDAN, KAMEL  
3 HAMID AL-FADHELI, NIDAL MOHAMMAD AL-SHENDI, MARTHA ANN COLWELL,  
4 SHARON FAYE KING, SLIMANE HAMZAOU, IBRAHIM HASSAN ELRAWY,, ALAA  
5 GHASSOUB OBEID and others known and unknown to the Grand Jury, did knowingly and  
6 unlawfully combine, conspire, confederate and agree together, to:

7 1. Conduct financial transactions affecting interstate and foreign commerce, which involved  
8 the proceeds of a specified unlawful activity, that is conspiracy to commit interstate  
9 transportation and receipt of stolen property of the value of \$5,000.00 or more, in violation  
10 of 18 U.S.C. § 2314 and §2315, with the intent to promote the carrying on of at least one of  
11 the aforementioned specified unlawful activities, and that while conducting and attempting  
12 to conduct such financial transactions, the defendants knew that the property involved in the  
13 financial transactions represented the proceeds of some form of unlawful activity, in  
14 violation of 18 U.S.C. §1956(a)(1)(A)(i); and

15 2. Conduct financial transactions affecting interstate and foreign commerce, which involved  
16 the proceeds of a specified unlawful activity, that is conspiracy to committ interstate  
17 transportation and receipt of stolen property of the value of \$5,000.00 or more, in violation  
18 of 18 U.S.C. § 2314 and §2315; knowing that the transaction is designed in whole or in part  
19 to avoid a transaction reporting requirement under state or federal law, in violation of 18  
20 U.S.C. §1956(a)(1)(B)(ii).

21 3. Engage in monetary transactions affecting interstate and foreign commerce in criminally  
22 derived property of a value of greater than \$10,000.00 from one or more violations of  
23 conspiracy to committ interstate transportation and receipt of stolen property of the value of  
24 \$5,000.00 or more, in violation of 18 U.S.C. § 2314; and §2315; in violation of 18 U.S.C.  
25 § 2315, in violation of 18 U.S.C. § 1957.

26 **MANNER, MEANS, AND METHODS**

27 1. It was a part of the conspiracy that the conspirators involved used the business  
28 known as Jamal Trading Company, Inc., in Tempe Arizona, including, but not limited to, the  
employees and real and personal property and financial and other accounts of that business,

a. in interstate transportation of stolen property of the value of  
\$5,000.00 or more, in violation of 18 U.S.C. § 2314; receipt,  
possession, concealment, storage, selling, and disposing of stolen  
property of the value of \$5,000,00 or more that has moved  
interstate after being stolen, in violation of 18 U.S.C. § 2315; and

b. in financial and monetary transactions in the proceeds of one or  
more violations of 18 U.S.C. § 2314 and § 2315, in violation of 18



1 U.S.C. § 1956 and § 1957.

2 2. The conspirators used accounts at financial institutions, including, but not limited  
3 to, accounts in the name of Jamal Trading Company Inc. to pay those who supplied infant  
4 formula, including stolen infant formula, and to deposit the proceeds of the sale of infant  
5 formula, including stolen infant formula. The deposits of the proceeds of the sale of stolen infant  
6 formula into the accounts and the commingling of those illegal proceeds with the proceeds of the  
7 sale of non-stolen infant formula constituted

8 a. financial transactions affecting interstate and foreign commerce  
9 in the proceeds of specified unlawful activity in violation of 18  
10 U.S.C. § 1956(a)(1)(A)(i) because the financial transactions were  
11 made with the intent to promote the carrying on of a specified  
12 unlawful activity, that is interstate transportation of stolen  
13 property, in violation of 18 U.S.C. § 2314; receipt, possession,  
14 concealment, storage, selling, and disposing of stolen property of  
15 the value of \$5,000.00 or more that has moved interstate after  
16 being stolen, in violation of 18 U.S.C. § 2315, and

17 b. financial transactions affecting interstate and foreign commerce  
18 in the proceeds of specified unlawful activity in violation of 18  
19 U.S.C. § 1956(a)(1)(B)(ii) because the financial transactions were  
20 designed, at least in part, to avoid a transaction reporting  
21 requirement under state or federal law, and

22 c. monetary transactions affecting interstate and foreign commerce  
23 in criminally derived property of a value greater than \$10,000.00,  
24 in violation of 18 U.S.C. § 1957, because the monetary transactions  
25 involved the proceeds of interstate transportation of stolen property  
26 of the value of \$5,000.00 or more, in violation of 18 U.S.C. §  
27 2314; receipt, possession, concealment, storage, selling, and  
28 disposing of stolen property of the value of \$5,000.00 or more that

has moved interstate after being stolen, in violation of 18 U.S.C. §  
2315.

**OVERT ACTS**

In furtherance of the conspiracy and to effect the objects thereof, one or more of the conspirators committed at least one overt act in the District of Arizona, of many overt acts, including the following:

(The Grand Jury realleges the overt acts contained in count 1 of the indictment as if fully set forth below)

Act	Date	Bank Acc.	Check #	Amount	To/Purpose
1	9/30/1997	BofA5645	7341	\$30,000.00	Check cashed by Samih Jammal
2	10/7/1997	BofA5645	1256	\$12,880.50	Check from JTC to J&M Distributors/ Baby formula
3	10/13/1997	BofA5645	1265	\$817.16	Atef Khalil/ Baby formula purchase
4	10/15/1997	BofA5645	1267	\$679.63	Ahmed Eid Algedi/Baby formula purchase
5	10/15/1997	BofA5645	1270	\$60,000.00	Check to JTC cashed by Samih Jammal
6	10/22/1997	BofA5645	1288	\$238.64	U.S. West Comm./ Business phone
7	10/27/1997	BofA5645	1319	\$1,069.50	Omar McClain/ Baby formula purchase
8	10/29/1997	BofA5645	1316	\$693.07	D. Wong & Associates/ Rent
9	11/10/1997	BofA5645	1346	\$2,000.00	Check from JTC to Sliman Hamzaoui/ Baby formula
10	11/14/1997	BofA5645	1354	\$100,000.00	Check cashed by Marwan Jamal
11	12/1/1997	BofA5645	1371	\$693.07	D. Wong & Associates/ Rent

1	12	12/5/1997	BofA5645	1553	\$53,750.00	Check to JTC cashed by Samih Jammal
2	13	1/17/1998	BofA5645	1653	\$27,000.00	Check cashed by Samih Jammal
3	14	2/10/1998	WF2100	1029	\$691.38	D. Wong & Associates/ Rent
4	15	7/25/1998	WF2100	1096	\$8,171.00	Fadi Awwad/ Baby formula purchase
5	16	11/1/1998	WF2100	1220	\$387.00	Elham Mezail/ Baby formula purchase
6	17	11/11/1998	WF2100	1235	\$1,060.35	Budget Rent A Car/ Vehicle rental
7	18	11/18/1998	BofA5645	1687	\$170.00	U.S. West Comm./ Business phone
8	19	1/27/1999	WF2100	1268	\$688.00	Check from JTC to Mounir Daly/ Baby formula
9	20	2/25/1999	WF2100	1256	\$900.00	Imad Mezail/ Baby formula purchase
10	21	4/28/1999	WF2100	1369	\$691.38	D. Wong & Associates/ Rent
11	22	5/3/1999	BofA5645	1762	\$1,647.00	Check from JTC to Hani Sarawan/ Baby formula
12	23	6/8/1999	WF2100	1425	\$4,000.00	Check from JTC to Rami Awwad
13	24	6/10/1999	WF2100	1427	\$35,000.00	Check to JTC cashed by Samih Jammal
14	25	6/26/1999	WF2100	1455	\$40,000.00	Check to JTC cashed by Samih Jammal
15	26	6/27/1999	WF2100	1462	\$1,554.00	Check from JTC to Hani Sarawan/ Baby formula
16	27	8/24/1999	BofA6442	2000	\$40,000.00	Check to JTC cashed by Samih Jammal
17	28	8/26/1999	WF6442	2007	\$35,000.00	Check from JTC to Saad Yohanan/ Baby formula
18	29	8/31/1999	BofA6442	2204	\$50,000.00	Check to JTC cashed by Samih Jammal

1	30	9/2/1999	WF6442	2205	\$1,000.00	Check from JTC to Ahmed Alhulaisi
2						
3	31	9/6/1999	WF8037	1057	\$1,504.66	Check from JTC to Hani Sarawan/ Baby formula
4						
5	32	9/9/1999	BofA6442	2213	\$40,000.00	Check to JTC cashed by Samih Jammal
6						
7	33	11/14/1999	WF6442	2347	\$2,000.00	Check from JTC to Rami Awwad/ Baby formula
8						
9	34	11/15/1999	BofA6442	Teller	\$50,000.00	Teller withdrawal by Samih Jammal
10						
11	35	11/19/1999	BofA6442	2372	\$8,634.00	Naji Aboabdo/ Baby formula purchase
12						
13	36	12/7/1999	WF8037	1121	\$810.00	U.S. West Comm/ Business phone
14						
15	37	12/20/1999	WF6442	2423	\$1,900.00	Check from JTC to Hani Sarawan/ Baby formula
16						
17	38	1/3/2000	WF6442	2457	\$560.00	Check from JTC to Kamel Al Fadheli/ Baby formula
18						
19	39	1/13/2000	WF8037	2964	\$70,000.00	Check cashed by Samih Jammal
20						
21	40	2/14/2000	WF6442	2522	\$1,932.00	Check from JTC to Hani Sarawan/ Baby formula
22						
23	41	2/29/2000	WF6442	2541	\$18,263.78	Check from JTC to Tamier Swailem
24						
25	42	3/7/2000	WF8037	1176	\$7,000.00	Check from JTC to Tamier Swailem
26						
27	43	3/28/2000	WF8037	1222	\$2,318.00	Check from JTC to Mamoun Al Jammal/ Baby formula
28						
	44	3/28/2000	WF8037	1223	\$9,000.00	Check from JTC to Mamoun Al Jammal/ Baby formula
	45	3/28/2000	WF8037	1224	\$9,000.00	Check from JTC to Mamoun Al Jammal/ Baby formula
	46	4/18/2000	WF8037	1250	\$5,864.00	Check from JTC to Mamoun Al Jammal/ Baby formula
	47	4/18/2000	WF8037	1251	\$5,000.00	Check from JTC to Mamoun Al Jammal/ Baby formula

1	48	4/29/2000	WF8037	1254	\$2,500.00	Daed White/ Employee salary
2						
3	49	5/6/2000	WF8037	1298	\$50,000.00	Check cashed by Samih Jammal
4						
5	50	5/13/2000	WF8037	1316	\$3,681.58	Check from JTC to Hani Sarawan/ Baby formula
6	51	5/21/2000	WF8037	1347	\$6,300.00	Check from JTC to Rami Awwad
7						
8	52	5/26/2000	WF8037	1362	\$65,000.00	Check cashed by Samih Jammal
9						
10	53	6/23/2000	WF8037	1512	\$9,000.00	Chase USA Credit Card/ Bill payment
11	54	6/23/2000	WF8037	1429	\$60,000.00	Check cashed by Samih Jammal
12						
13	55	6/28/2000	WF8037	1449	\$2,500.00	Daed White/ Employee salary
14	56	6/28/2000	WF8037	1447	\$21,560.00	Check from JTC to J&M Distributors/ Baby formula
15						
16	57	7/4/2000	WF8037	1456	\$7,770.00	Check from JTC to Saad Yohanan/ Baby formula
17	58	7/4/2000	WF8037	1457	\$7,000.00	Check from JTC to Saad Yohanan/ Baby formula
18						
19	59	7/6/2000	WF8037	1462	\$50,000.00	Check cashed by Samih Jammal
20	60	7/26/2000	WF8037	1493	\$866.66	Reliance Management/ Rent
21						
22	61	8/10/2000	WF8037	1555	\$60,000.00	Check cashed by Samih Jammal
23	62	8/12/2000	WF8037	1567	\$50,000.00	Check cashed by Samih Jammal
24						
25	63	8/19/2000	WF8037	1588	\$880.50	Check from JTC to Hemdani Mohammad Anis
26	64	8/22/2000	WF8037	1597	\$477.07	Celtic Forklift/ payment on forklift
27						
28	65	8/23/2000	WF8037	1599	\$51,000.00	Check cashed by Samih Jammal

1	66	8/25/2000	WF8037	1610	\$50,000.00	Check cashed by Samih Jammal
2						
3	67	9/5/2000	WF8037	1630	\$1,717.50	Check from JTC to Sharif Hamdan/ Baby formula
4						
5	68	9/19/2000	WF8037	1586	\$20,000.00	Check from JTC to Ramy Jammal/ Baby formula
6						
7	69	10/3/2000	WF8037	1681	\$9,500.00	Check from JTC to Saad Yohanan/ Baby formula
8						
9	70	10/3/2000	WF8037	1682	\$9,500.00	Check from JTC to Saad Yohanan/ Baby formula
10						
11	71	10/3/2000	WF8037	1683	\$9,500.00	Check from JTC to Saad Yohanan/ Baby formula
12						
13	72	10/3/2000	WF8037	1684	\$9,500.00	Check from JTC to Saad Yohanan/ Baby formula
14						
15	73	10/3/2000	WF8037	1685	\$9,500.00	Check from JTC to Saad Yohanan/ Baby formula
16						
17	74	10/3/2000	WF8037	1686	\$9,500.00	Check from JTC to Saad Yohanan/ Baby formula
18						
19	75	1/15/2000	WF8037	1814	\$3,701.60	McDonald Packaging/ Packaging supplies
20						
21	76	1/15/2000	WF8037	1815	\$2,266.00	Check from JTC to Kamel Al Fadheli/ Baby formula
22						
23	77	12/1/2000	WF8037	1866	\$50,000.00	Check cashed by Samih Jammal
24						
25	78	2/11/2000	WF8037	1887	\$70,000.00	Check cashed by Samih Jammal
26						
27	79	2/12/2000	WF8037	1895	\$9,500.00	Check from JTC to Mamoun Al Jammal/ Baby formula
28						
	80	2/12/2000	WF8037	1896	\$9,500.00	Check from JTC to Mamoun Al Jammal/ Baby formula
	81	2/12/2000	WF8037	1897	\$9,500.00	Check from JTC to Mamoun Al Jammal/ Baby formula
	82	2/12/2000	WF8037	1898	\$4,342.00	Check from JTC to Mamoun Al Jammal/ Baby formula
	83	2/28/2000	WF8037	2941	\$900.24	Priest Business Park/ Rent

1	84	2/29/2000	WF8037	2948	\$70,000.00	Check cashed by Samih Jammal
2						
3	85	1/2/2001	WF8037	2952	\$9,937.00	Check from JTC to Mamoun Al Jammal/ Baby formula
4						
5	86	1/2/2001	WF8037	2953	\$9,937.00	Check from JTC to Mamoun Al Jammal/ Baby formula
6						
7	87	1/17/2001	WF8037	2968	\$5,000.00	Check from JTC to Arizona Nutrition Stores Inc.
8						
9	88	2/5/2001	WF8037	3003	\$9,500.00	Check from JTC to Mamoun Al Jammal/ Baby formula
10						
11	89	2/5/2001	WF8037	3004	\$9,500.00	Check from JTC to Mamoun Al Jammal/ Baby formula
12						
13	90	2/5/2001	WF8037	3005	\$9,500.00	Check from JTC to Mamoun Al Jammal/ Baby formula
14						
15	91	2/5/2001	WF8037	3006	\$4,802.00	Check from JTC to Mamoun Al Jammal/ Baby formula
16						
17	92	2/14/2001	WF8037	3032	\$9,000.00	Check from JTC to Mamoun Al Jammal/ Baby formula
18						
19	93	2/14/2001	WF8037	3033	\$2,606.00	Check from JTC to Mamoun Al Jammal/ Baby formula
20						
21	94	2/23/2001	WF8037	3056	\$60,000.00	Check cashed by Samih Jammal
22						
23	95	3/16/2001	WF8037	3123	\$180.00	Check from JTC to Mounir Daly
24						
25	96	3/17/2001	WF8037	3126	\$60,000.00	Check cashed by Samih Jammal
26						
27	97	3/25/2001	WF8037	3136	\$8,000.00	Check from JTC to Mamoun Al Jammal/ Baby formula
28						
	98	3/25/2001	WF8037	3137	\$8,000.00	Check from JTC to Mamoun Al Jammal/ Baby formula
	99	3/25/2001	WF8037	3138	\$7,197.00	Check from JTC to Mamoun Al Jammal/ Baby formula
	100	4/1/2001	WF8037	3151	\$9,000.00	Check from JTC to Mamoun Al Jammal/ Baby formula
	101	4/1/2001	WF8037	3152	\$9,000.00	Check from JTC to Mamoun Al Jammal/ Baby formula

1	102	4/1/2001	WF8037	3153	\$9,000.00	Check from JTC to Mamoun Al Jammal/ Baby formula
2						
3	103	4/1/2001	WF8037	3154	\$604.00	Check from JTC to Mamoun Al Jammal/ Baby formula
4						
5	104	5/30/2001	WF8037	3243	\$30,000.00	Check to JTC cashed by Samih Jammal
6						
7	105	6/7/2001	WF8037	3253	\$9,000.00	Check from JTC to Mamoun Al Jammal/ Baby formula
8	106	6/7/2001	WF8037	3255	\$9,000.00	Check from JTC to Mamoun Al Jammal/ Baby formula
9						
10	107	6/7/2001	WF8037	3257	\$9,125.00	Check from JTC to Mamoun Al Jammal/ Baby formula
11	108	6/12/2001	WF8037	3267	\$551.69	Penske Truck Leasing/ Vehicle rental
12						
13	109	6/20/2001	WF8037	3279	\$2,866.00	Elway Packaging /Packaging supplies
14	110	6/25/2001	WF8037	3291	\$9,000.00	Check from JTC to Mamoun Al Jammal/ Baby formula
15						
16	111	6/25/2001	WF8037	3292	\$9,000.00	Check from JTC to Mamoun Al Jammal/ Baby formula
17	112	6/25/2001	WF8037	3293	\$8,340.00	Check from JTC to Mamoun Al Jammal/ Baby formula
18						
19	113	6/25/2001	WF8037	3294	\$9,000.00	Check from JTC to Mamoun Al Jammal/ Baby formula
20	114	6/25/2001	WF8037	3295	\$2,140.00	Check from JTC to Mamoun Al Jammal/ Baby formula
21						
22	115	7/2/2001	WF8037	3308	\$9,000.00	Check from JTC to Mamoun Al Jammal/ Baby formula
23	116	7/2/2001	WF8037	3309	\$9,000.00	Check from JTC to Mamoun Al Jammal/ Baby formula
24						
25	117	7/2/2001	WF8037	3310	\$9,000.00	Check from JTC to Mamoun Al Jammal/ Baby formula
26	118	7/2/2001	WF8037	3311	\$9,190.00	Check from JTC to Mamoun Al Jammal/ Baby formula
27						
28	119	7/10/2001	WF8037	3321	\$6,000.00	Check from JTC to Mamoun Al Jammal/ Baby formula



1	120	7/10/2001	WF8037	3322	\$6,000.00	Check from JTC to Mamoun Al Jammal/ Baby formula
2	121	7/10/2001	WF8037	3323	\$6,000.00	Check from JTC to Mamoun Al Jammal/ Baby formula
3	122	7/10/2001	WF8037	3324	\$6,000.00	Check from JTC to Mamoun Al Jammal/ Baby formula
4	123	7/10/2001	WF8037	3325	\$7,417.00	Check from JTC to Mamoun Al Jammal/ Baby formula
5	124	7/12/2001	WF8037	3330	\$1,100.00	Check from JTC to Abdul Razzek Jamal
6	125	7/14/2001	WF8037	3335	\$40,000.00	Check from JTC to Drean Corp.
7	126	7/18/2001	WF8037	3338	\$9,301.00	Check from JTC to Hemdani Mohammad Anis
8	127	7/31/2001	WF8037	WT	\$42,329.00	Wire Transfer from JTC to Twins Wholesale Inc.
9	128	8/22/2001	WF8037	3392	\$2,400.00	Check from JTC to Marwan Jammal
10	129	8/28/2001	WF8037	Teller	\$102,480.00	Teller withdrawal by Samih Jammal
11	130	9/7/2001	WF8037	3406	\$50,000.00	Check cashed by Samih Jammal
12	131	9/17/2001	WF8037	3419	\$1,134.00	Check from JTC to Hani Sarawan/ Baby formula
13	132	10/16/2001	WF8037	3459	\$8,000.00	Check from JTC to Mamoun Al Jammal/ Baby formula
14	133	10/16/2001	WF8037	3460	\$8,000.00	Check from JTC to Mamoun Al Jammal/ Baby formula
15	134	10/16/2001	WF8037	3461	\$8,000.00	Check from JTC to Mamoun Al Jammal/ Baby formula
16	135	10/16/2001	WF8037	3462	\$8,000.00	Check from JTC to Mamoun Al Jammal/ Baby formula
17	136	10/16/2001	WF8037	3463	\$9,401.00	Check from JTC to Mamoun Al Jammal/ Baby formula
18	137	10/18/2001	WF8037	3470	\$5,000.00	Check from JTC to Khaled Noaman

1	138	11/7/2001	WF8037	3500	\$6,458.00	Noha Nashed/ Baby formula purchase
2						
3	139	11/14/2001	WF8037	3513	\$20,600.00	Check to JTC cashed by Samih Jammal
4						
5	140	11/28/2001	WF4702	2271	\$932.98	Priest Business Park/ Rent
6						
7	141	11/29/2001	WF8037	3528	\$8,993.00	Check from JTC to Kamel Al Fadhel/ Baby formula
8						
9	142	12/14/2001	WF4702	2287	\$1,332.40	Elway Packaging/ Packaging supplies
10						
11	143	12/17/2001	WF8037	3554	\$9,500.00	Check from JTC to Ahmed Ashry
12						
13	144	12/29/2001	WF8037	3568	\$4,000.00	Check from JTC Abdul K. Hamze/ Baby formula
14						
15	145	1/2/2002	WF4702	2297	\$933.00	Reliance Management / Rent
16						
17	146	1/4/2002	WF4702	2301	\$20,000.00	Check cashed by Samih Jammal
18						
19	147	1/16/2002	WF8037	3586	\$4,921.66	Check from JTC to Kamel Al Fadhel/ Baby formula
20						
21	148	1/18/2002	WF8037	3594	\$6,563.63	Check from JTC to Khaled Noaman
22						
23	149	1/23/2002	WF8037	3603	\$15,000.00	Check cashed by Samih Jammal
24						
25	150	2/5/2002	WF8037	3609	\$9,500.00	Check from JTC to Ramy Jammal/ Baby formula
26						
27	151	2/5/2002	WF8037	3610	\$8,105.00	Check from JTC to Ramy Jammal/ Baby formula
28						
	152	2/6/2002	WF8037	3614	\$2,383.00	Elway Packaging/ Packaging supplies
	153	2/25/2002	WF8037	3634	\$5,000.00	Check from JTC to Marwan Jammal
	154	3/19/2002	WF4702	2367	\$1,168.00	Reliance Management / Rent
	155	3/21/2002	WF8037	3661	\$6,000.00	Check from JTC Abdul K. Hamze/ Baby formula

1	156	3/21/2002	WF8037	3663	\$1,706.63	Check from JTC to Sharon King/ Baby formula
2						
3	157	3/27/2002	WF8037	3674	\$2,223.00	Check from JTC to Ahmad Al Hulasi
4						
5	158	3/31/2002	WF8037	3685	\$1,452.00	Check from JTC to Sliman Hamzaoui/ Baby formula
6	159	4/9/2002	WF8037	3703	\$2,262.15	Check from JTC to Martha Colwell/ Baby formula
7						
8	160	4/10/2002	WF8037	3705	\$4,370.00	Check from JTC to Hani Sarawan/ Baby formula
9						
10	161	5/29/2002	WF8037	3797	\$25,000.00	Check cashed by Samih Jammal
11	162	6/16/2002	WF8037	3833	\$11,614.00	Check from JTC to RJ Grocery Trading
12						
13	163	6/27/2002	WF3087	3848	\$4,404.85	Elway Packaging/ Packaging supplies
14						
15	164	7/3/2002	WF8037	3860	\$19,635.00	Check from JTC to Drean Corp.
16	165	7/11/2002	WF8037	3863	\$4,318.33	Check from JTC to Nidal Al Shendi/ Baby formula
17						
18	166	7/22/2002	WF8037	3880	\$1,689.85	Budget/ Vehicle rental
19	167	7/24/2002	WF8037	3887	\$8,056.00	Check from JTC to ENA International
20						
21	168	7/29/2002	WF8037	3906	\$1,664.40	Check from JTC to Fadel Hindi/ Baby formula
22						
23	169	8/4/2002	WF8037	3909	\$6,000.00	Check from JTC to Ramy Jammal/ Baby formula
24						
25	170	8/4/2002	WF8037	3910	\$6,273.00	Check from JTC to Ramy Jammal/ Baby formula
26	171	8/8/2002	WF8037	3924	\$4,000.00	Check from JTC to Oasis Trading
27						
28	172	8/19/2002	WF8037	3936	\$9,720.00	Check from JTC to Ramy Jammal/ Baby formula

173	8/19/2002	WF8037	3937	\$9,772.00	Check from JTC to Ramy Jammal/ Baby formula
174	8/20/2002	WF8037	3944	\$1,750.83	Check from JTC to Abdelsalam Abdelsalam
176	9/23/2002	WF8037	4014	\$5,000.00	Check from JTC to Ramy Jammal/ Baby formula
177	9/23/2002	WF8037	4015	\$8,802.00	Check from JTC to Ramy Jammal/ Baby formula
178	9/23/2002	WF8037	4016	\$5,000.00	Check from JTC to Ramy Jammal/ Baby formula
179	10/3/2002	WF8037	4043	\$3,000.00	Check from JTC to Abdul Razzek Jamal
180	10/7/2002	WF8037	4053	\$62.00	Check from JTC to Cheryl Fisher/ Baby formula
181	11/4/2002	WF8037	4120	\$976.33	Check from JTC to Sharif Hamdan/ Baby formula
182	11/7/2002	WF8037	4128	\$3,787.00	Check from JTC to Alaa Obeid
183	11/16/2002	WF8037	4146	\$6,597.76	Check from JTC to Fady Masri/ Baby formula

All in violation of 18 U.S.C. § 1956(h).

### FORFEITURE ALLEGATIONS

Upon conviction of one or more of the offenses alleged in Counts 1 and 2 of this Indictment, defendants shall forfeit to the United States pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c) any property, real or personal, constituting or derived from proceeds obtained directly or indirectly as a result of the said violations, including but not limited to the following:

#### (A) MONEY JUDGMENT:

A sum of money equal to approximately \$11,274,571.39 in United States currency, in that such sum in aggregate represents the amount of proceeds obtained as a result of the offenses (18 U.S.C. §§ 2314, 2315), for which the defendants are jointly and severally liable.

All United States currency funds or other monetary instruments credited to all accounts involved in or traceable to the offense, including but not limited to the following:

- 1           1. Jamal Trading Company account #376068037 at Wells Fargo Bank, 64 E Broadway,  
2 Tempe, Arizona,
- 3           2. Jamal Trading Company account #664594702 at Wells Fargo Bank, 64 E Broadway,  
4 Tempe, Arizona,
- 5           3. Ameritrade, 1005 N. Ameritrade Place, Bellevue, Nebraska, account 773153090 in the  
6 name of Samih Fadi Jammal SR.,
- 7           4. Drean Corporation. account #0632077095 at Wells Fargo Bank, 1004 W Chandler  
8 Blvd., Chandler, Arizona,
- 9           5. Drean Corporation account #06574347 at Bank One Corp., 201 N Central, Phoenix,  
10 Arizona,
- 11          6. J&M Distributors account #954036554 at Wells Fargo Bank, El Cajon Branch 475  
12 Fletcher Park Way, El Cajon, California,
- 13          7. Oasis International account #4671917188 at Wells Fargo Bank, 100 W Washington,  
14 Phoenix, Arizona,
- 15          8. RJ Grocery Trading account #1003345970 at Wells Fargo Bank, Garden Grove branch,  
16 Garden Grove, California,
- 17          9. RJ Grocery Trading account #6296019034 at Wells Fargo Bank, Garden Grove branch,  
18 Garden Grove, California,
- 19          10. RJ Grocery Trading account #932903356 at Bank of America, N.A., 201 E  
20 Washington, Phoenix, Arizona,
- 21          11. RJ Grocery Trading account #932525799 at Bank of America, N.A., 201 E  
22 Washington, Phoenix, Arizona,
- 23          12. Martha Colwell and Sharon King account #239301595 at Bank of America, N.A., 201  
24 E Washington, Phoenix, Arizona,
- 25          13. Martha Colwell and Sharon King account #275114842 at Bank of America, N.A., 201  
26 E Washington, Phoenix, Arizona,
- 27          14. Nice Twice account #4671557205 at Bank of America, N.A., 201 E Washington,  
28 Phoenix, Arizona,

1           15. Arizona Nutrition Stores account #664595501 at Wells Fargo Bank, 100 W  
2 Washington, Phoenix, Arizona,

3           As the result of committing one or more of the money laundering offenses in violation of  
4 18 U.S.C. § 1956, alleged in Count 6 of this Indictment, defendants shall forfeit to the United  
5 States pursuant to 18 U.S.C. § 982(a)(1):

6           1. All right, title, and interest in any and all property involved in each offense in  
7 violation of Title 18, United States Code, Section 1956, or conspiracy to commit such offense,  
8 for which the defendants are convicted, and all property traceable to such property, including the  
9 following: 1) all money or other property that was the subject of each transaction, transportation,  
10 transmission or transfer in violation of Section 1956(a)(1) or (2); 2) all commissions, fees and  
11 other property constituting proceeds obtained as a result of those violations; and 3) all property  
12 used in any manner or part to commit or to facilitate the commission of those violations  
13 including, but not limited to the following:

14                   (A) Approximately \$11,274,571.39 in United States currency, in that such  
15 sum in aggregate represents the amount involved in the aforestated offense, and is property  
16 traceable thereto, for which the defendants are jointly and severally liable.

17                   (B) All United States currency funds or other monetary instruments credited  
18 to all accounts involved in or traceable to the offense, including but not limited to the following:

19           1. Jamal Trading Company account #376068037 at Wells Fargo Bank, 64 E Broadway,  
20 Tempe, Arizona,

21           2. Jamal Trading Company account #664594702 at Wells Fargo Bank, 64 E Broadway,  
22 Tempe, Arizona,

23           3. Ameritrade, 1005 N. Ameritrade Place, Bellevue, Nebraska, account 773153090 in the  
24 name of Samih Fadl Jammal SR.,

25           4. Drean Corporation. account #0632077095 at Wells Fargo Bank, 1004 W Chandler  
26 Blvd., Chandler, Arizona,

27           5. Drean Corporation account #06574347 at Bank One Corp., 201 N Central, Phoenix,  
28 Arizona,

          6. J&M Distributers account #954036554 at Wells Fargo Bank, El Cajon Branch 475

1 Fletcher Park Way, El Cajon, California,

2 7. Oasis International account #4671917188 at Wells Fargo Bank, 100 W Washington,  
3 Phoenix, Arizona,

4 8. RJ Grocery Trading account #1003345970 at Wells Fargo Bank, Garden Grove branch,  
5 Garden Grove, California,

6 9. RJ Grocery Trading account #6296019034 at Wells Fargo Bank, Garden Grove branch,  
7 Garden Grove, California,

8 10. RJ Grocery Trading account #932903356 at Bank of America, N.A., 201 E  
9 Washington, Phoenix, Arizona,

10 11. RJ Grocery Trading account #932525799 at Bank of America, N.A., 201 E  
11 Washington, Phoenix, Arizona,

12 12. Martha Colwell and Sharon King account #239301595 at Bank of America, N.A., 201  
13 E Washington, Phoenix, Arizona,

14 13. Martha Colwell and Sharon King account #275114842 at Bank of America, N.A., 201  
15 E Washington, Phoenix, Arizona,

16 14. Nice Twice account #4671557205 at Bank of America, N.A., 201 E Washington,  
17 Phoenix, Arizona,

18 15. Arizona Nutrition Stores account #664595501 at Wells Fargo Bank, 100 W Washington,  
19 Phoenix, Arizona,

20 Pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18,  
21 United States Code, Section 982(b) and 28 U.S.C. § 2461, each defendant shall forfeit substitute  
22 property, up to the value of the amount described above, if, by any act or omission of the  
23 defendants, the property described in I and II above, or any portion thereof, cannot be located  
24 upon the exercise of due diligence; has been transferred, sold to or deposited with a third party;  
25 has been placed beyond the jurisdiction of the Court; has been substantially diminished in value;  
26 or has been commingled with other property which cannot be divided without difficulty,  
27 including, but not limited to, the following:

28 A) All United States currency, funds or other monetary instruments credited to the  
following accounts:

1 1. Personal checking account #0911668317 at Wells Fargo Bank, 64 E  
2 Broadway, Tempe, Arizona,

3 2. Savings account #6337166243 at Wells Fargo Bank, Wells Fargo Bank,  
4 64 E Broadway, Tempe, Arizona.

5 **(B) REAL PROPERTY:**

6 (1) 824 W Watson

7 Being the same property conveyed to Samih F. Jammal by deed #991137718 dated  
8 December 21, 1999 and recorded as parcel #301-05-048 in the office of the Maricopa County  
9 Clerk;

10 (2) 1361 S Cholla Place

11 Being the same property conveyed to Slimane/ Quahida Hamzaoui by deed #000582988  
12 dated July 31, 2000 and recorded as parcel #303-26-471 in the office of the Maricopa County  
13 Clerk,.

14 **(C) VEHICLES**

15 (1) 1994 Chevrolet Suburban bearing Arizona plate 195-HFR, Vin  
16 #1GNFK16K9RJ302307, registered to Fatma and Tamier Swailem, 1001 E Windsor, Tucson,  
17 Arizona;

18  
19 (2) 1999 Chevrolet Truck bearing Arizona plate CB46172, Vin #1GBJG31R1X1090783,  
20 registered to Jammal Trading Company/ Samih Jammal, P.O. Box 24171, Tempe, Arizona ;

21 (3) 1996 Jeep Cherokee bearing Arizona plate 612-JNP, Vin #1J4FT68S3TL103372,  
22 registered to Fadel Hindi, 2301 W Village Dr., Phoenix, Arizona;

23 (4) 2000 Nissan Pathfinder bearing Arizona plate 658-FEB, Vin  
24 #JN8AR07Y5YW398065, registered to Samih F. Jammal, P.O. Box 24171, Tempe, Arizona.

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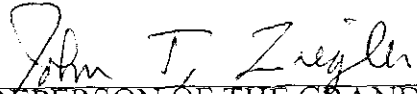
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1 All in accordance with Title 18, United States Code, Sections 981(a)(1)(C); 982(a)(1), 28  
2 U.S.C. Section 2461 and Rule 32.2(a), Federal Rules of Criminal Procedure.

3  
4 A TRUE BILL

5   
6 FOREPERSON OF THE GRAND JURY  
Date: March 13, 2003

7 PAUL K. CHARLTON  
8 United States Attorney  
9 District of Arizona

10   
KEVIN M. RAPP  
Assistant U.S. Attorney

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