

STATE OF MICHIGAN 48th JUDICIAL DISTRICT JUDICIAL CIRCUIT	INFORMATION FELONY	DISTRICT: CIRCUIT:
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District Court ORI: MI630045J

26000 EVERGREEN ROAD SOUTHFIELD, MI 48076
 248-796-5800

Circuit Court ORI:

AG ORI: MI820025A

THE PEOPLE OF THE STATE OF MICHIGAN

v

	DOB
KHALID KADA 96-07901243-01	01/01/1959
ADNAN KADA 96-07901243-02	04/02/1961
ROMEL KEJBOU 96-07901243-03	
LAITH ALHAJJAR 96-07901243-04	12/27/1972
EDDIE BARASH 96-07901243-05	03/15/1951
AZIZ ABOONA 96-07901243-06	07/01/1959
EDDI ABOONA 96-07901243-07	01/06/1966
HIKMAT SOKA 96-07901243-08	12/17/1940
MICHAEL KRAUTHOFER 96-07901243-09	07/11/1970
DANIELLE KRAUTHOFER 96-07901243-10	
SAAD CHOULAGH 96-07901243-11	02/22/1970
WALEED KADA 96-07901243-12	03/03/1984
EMMETT TOMS 96-07901243-13	08/05/1954
MARLOWE SATTAM 96-07901243-14	06/02/1966
ESSAM SATTAM 96-07901243-15	02/13/1960

Victim or complainant		Complaining Witness	Date: On or about
MICHIGAN DEPARTMENT OF TREASURY		D/SGT. PAUL DIPIETRO	March 2007 - August 2007
City/Twp./Village	County in Michigan		
City of Southfield	OAKLAND		
Charge(s)	Maximum Penalty		
See Below	See Below		

STATE OF MICHIGAN, COUNTY OF OAKLAND

IN THE NAME OF THE PEOPLE OF THE STATE OF MICHIGAN: Michael A. Cox, Attorney General for the State of Michigan, appears before the court and informs the court that on the above date and in Southfield, Pontiac, Ypsilanti, Detroit, Troy, Farmington, West Bloomfield and Sterling Heights Michigan, the defendant(s):

COUNT 1 DEFENDANT(S) (01, 12): CRIMINAL ENTERPRISES - CONDUCTING

being a person employed by or associated with an enterprise, to wit: LaGrange Metals, did knowingly conduct or participate in the affairs of the enterprise directly or indirectly through a pattern of racketeering activity, consisting of two or more of the following incidents of racketeering, to wit:

on or about March 14, 2007, in Ypsilanti, Michigan, defendant did aid or abet in the commission of the following offense for financial gain, to wit: did with the intent to defraud or cheat another person by false pretense obtain from a person money, personal property, or the use of an instrument, facility, article, or other valuable thing or service ;

and on or about March 15, 2007, in Detroit, Michigan, defendant did aid or abet in the commission of the following offense for financial gain, to wit: did with the intent to defraud or cheat another person by false pretense obtain from a person money, personal property, or the use of an instrument, facility, article, or other valuable thing or service,

and on or about March 15, 2007, in Pontiac, Michigan, defendant did aid or abet in the commission of the following offense for financial gain, to wit: did with the intent to defraud or cheat another person by false pretense obtain from a person money, personal property, or the use of an instrument, facility, article, or other valuable thing or service,

and on or about March 29, 2007, in Detroit, Michigan, defendant did aid or abet in the commission of the following offense for financial gain, to wit: did with the intent to defraud or cheat another person by false pretense obtain from a person money, personal property, or the use of an instrument, facility, article, or other valuable thing or service,

and on or about April 4, 2007, in Ypsilanti, Michigan, defendant did aid or abet in the commission of the following offense for financial gain, to wit: did with the intent to defraud or cheat another person by false pretense obtain from a person money, personal property, or the use of an instrument, facility, article, or other valuable thing or service,

offense for financial gain, to wit: did with the intent to defraud or cheat another person by false pretense obtain from a person money, personal property, or the use of an instrument, facility, article, or other valuable thing or service, and on or about April 16, 2007, in Detroit, Michigan, defendant did aid or abet in the commission of the following offense for financial gain, to wit: did with the intent to defraud or cheat another person by false pretense obtain from a person money, personal property, or the use of an instrument, facility, article, or other valuable thing or service, and on or about April 17, 2007, in Ypsilanti, Michigan, defendant did aid or abet in the commission of the following offense for financial gain, to wit: did with the intent to defraud or cheat another person by false pretense obtain from a person money, personal property, or the use of an instrument, facility, article, or other valuable thing or service, and on or about April 18, 2007, in Detroit, Michigan, defendant did aid or abet in the commission of the following offense for financial gain, to wit: did with the intent to defraud or cheat another person by false pretense obtain from a person money, personal property, or the use of an instrument, facility, article, or other valuable thing or service, and on or about April 20, 2007, in Pontiac, Michigan, defendant did aid or abet in the commission of the following offense for financial gain, to wit: did with the intent to defraud or cheat another person by false pretense obtain from a person money, personal property, or the use of an instrument, facility, article, or other valuable thing or service, which are interrelated by the common scheme of defrauding the Michigan Department of Treasury, and which amount to or pose a threat of continued criminal activity; contrary to MCL 750.159(1). [750.159(1)]
FELONY: 20 Years and/or \$100,000.00; criminal forfeiture of proceeds, substituted proceeds, and instrumentalities of racketeering listed on attached notification (see MCL 750.159(4)); court may order court costs, costs of investigation, and/or costs of prosecution

COUNT 2 DEFENDANT(S) (01, 12): FALSE PRETENSES - \$1,000.00 OR MORE BUT LESS THAN \$20,000.00

did, with the intent to defraud or cheat, make or use a false pretense to obtain from a person money, personal property, or the use of an instrument, facility, article, or other valuable thing or service, having a value of \$1,000.00 or more but less than \$20,000.00; contrary to MCL 750.218(4)(a). [750.2184A]

FELONY: 5 Years and/or \$10,000.00, or 3 times the value of the money or property involved, whichever is greater

COUNT 3 DEFENDANT(S) (01, 12): FALSE PRETENSES - \$1,000.00 OR MORE BUT LESS THAN \$20,000.00

did, with the intent to defraud or cheat, make or use a false pretense to obtain from a person money, personal property, or the use of an instrument, facility, article, or other valuable thing or service, having a value of \$1,000.00 or more but less than \$20,000.00; contrary to MCL 750.218(4)(a). [750.2184A]

FELONY: 5 Years and/or \$10,000.00, or 3 times the value of the money or property involved, whichever is greater

COUNT 4 DEFENDANT(S) (01, 12): FALSE PRETENSES - \$1,000.00 OR MORE BUT LESS THAN \$20,000.00

did, with the intent to defraud or cheat, make or use a false pretense to obtain from a person money, personal property, or the use of an instrument, facility, article, or other valuable thing or service, having a value of \$1,000.00 or more but less than \$20,000.00; contrary to MCL 750.218(4)(a). [750.2184A]

FELONY: 5 Years and/or \$10,000.00, or 3 times the value of the money or property involved, whichever is greater

COUNT 5 DEFENDANT(S) (01, 12): FALSE PRETENSES - \$1,000.00 OR MORE BUT LESS THAN \$20,000.00

did, with the intent to defraud or cheat, make or use a false pretense to obtain from a person money, personal property, or the use of an instrument, facility, article, or other valuable thing or service, having a value of \$1,000.00 or more but less than \$20,000.00; contrary to MCL 750.218(4)(a). [750.2184A]

FELONY: 5 Years and/or \$10,000.00, or 3 times the value of the money or property involved, whichever is greater

COUNT 6 DEFENDANT(S) (01, 12): FALSE PRETENSES - \$1,000.00 OR MORE BUT LESS THAN \$20,000.00

did, with the intent to defraud or cheat, make or use a false pretense to obtain from a person money, personal property, or the use of an instrument, facility, article, or other valuable thing or service, having a value of \$1,000.00 or more but less than \$20,000.00; contrary to MCL 750.218(4)(a). [750.2184A]

FELONY: 5 Years and/or \$10,000.00, or 3 times the value of the money or property involved, whichever is greater

\$20,000.00

did, with the intent to defraud or cheat, make or use a false pretense to obtain from a person money, personal property, or the use of an instrument, facility, article, or other valuable thing or service, having a value of \$1,000.00 or more but less than \$20,000.00; contrary to MCL 750.218(4)(a). [750.2184A]

FELONY: 5 Years and/or \$10,000.00, or 3 times the value of the money or property involved, whichever is greater

COUNT 8 DEFENDANT(S) (01, 12): FALSE PRETENSES - \$1,000.00 OR MORE BUT LESS THAN \$20,000.00

did, with the intent to defraud or cheat, make or use a false pretense to obtain from a person money, personal property, or the use of an instrument, facility, article, or other valuable thing or service, having a value of \$1,000.00 or more but less than \$20,000.00; contrary to MCL 750.218(4)(a). [750.2184A]

FELONY: 5 Years and/or \$10,000.00, or 3 times the value of the money or property involved, whichever is greater

COUNT 9 DEFENDANT(S) (01, 12): FALSE PRETENSES - \$1,000.00 OR MORE BUT LESS THAN \$20,000.00

did, with the intent to defraud or cheat, make or use a false pretense to obtain from a person money, personal property, or the use of an instrument, facility, article, or other valuable thing or service, having a value of \$1,000.00 or more but less than \$20,000.00; contrary to MCL 750.218(4)(a). [750.2184A]

FELONY: 5 Years and/or \$10,000.00, or 3 times the value of the money or property involved, whichever is greater

COUNT 10 DEFENDANT(S) (01, 12): FALSE PRETENSES - \$1,000.00 OR MORE BUT LESS THAN \$20,000.00

did, with the intent to defraud or cheat, make or use a false pretense to obtain from a person money, personal property, or the use of an instrument, facility, article, or other valuable thing or service, having a value of \$1,000.00 or more but less than \$20,000.00; contrary to MCL 750.218(4)(a). [750.2184A]

FELONY: 5 Years and/or \$10,000.00, or 3 times the value of the money or property involved, whichever is greater

COUNT 11 DEFENDANT(S) (01, 12): FALSE PRETENSES - \$1,000.00 OR MORE BUT LESS THAN \$20,000.00

did, with the intent to defraud or cheat, make or use a false pretense to obtain from a person money, personal property, or the use of an instrument, facility, article, or other valuable thing or service, having a value of \$1,000.00 or more but less than \$20,000.00; contrary to MCL 750.218(4)(a). [750.2184A]

FELONY: 5 Years and/or \$10,000.00, or 3 times the value of the money or property involved, whichever is greater

COUNT 12 DEFENDANT(S) (01, 12): BEVERAGE CONTAINERS - RETURNING NONRETURNABLES - MORE THAN 100

did return or attempt to return to a dealer for a refund, more than 100 nonreturnable beverage containers, that the person knew or should have known did not have a deposit paid for them at the time of purchase; contrary to MCL 445.574a(2)(b). [445.574A2B-A]

MISDEMEANOR: 93 Days and/or \$500.00

COUNT 13 DEFENDANT(S) (01, 12): BEVERAGE CONTAINERS - RETURNING NONRETURNABLES - MORE THAN 100

did return or attempt to return to a dealer for a refund, more than 100 nonreturnable beverage containers, that the person knew or should have known did not have a deposit paid for them at the time of purchase; contrary to MCL 445.574a(2)(b). [445.574A2B-A]

MISDEMEANOR: 93 Days and/or \$500.00

COUNT 14 DEFENDANT(S) (01, 12): BEVERAGE CONTAINERS - RETURNING NONRETURNABLES - MORE THAN 100

did return or attempt to return to a dealer for a refund, more than 100 nonreturnable beverage containers, that the person knew or should have known did not have a deposit paid for them at the time of purchase; contrary to MCL 445.574a(2)(b). [445.574A2B-A]

MISDEMEANOR: 93 Days and/or \$500.00

COUNT 15 DEFENDANT(S) (01, 12): BEVERAGE CONTAINERS - RETURNING NONRETURNABLES - MORE THAN 100

did return or attempt to return to a dealer for a refund, more than 100 nonreturnable beverage containers, that the person knew or should have known did not have a deposit paid for them at the time of purchase; contrary to MCL 445.574a(2)(b). [445.574A2B-A]

MISDEMEANOR: 93 Days and/or \$500.00

COUNT 16 DEFENDANT(S) (01, 12): BEVERAGE CONTAINERS - RETURNING NONRETURNABLES - MORE THAN 100

did return or attempt to return to a dealer for a refund, more than 100 nonreturnable beverage containers, that the person knew or should have known did not have a deposit paid for them at the time of purchase; contrary to MCL 445.574a(2)(b). [445.574A2B-A]

MISDEMEANOR: 93 Days and/or \$500.00

COUNT 17 DEFENDANT(S) (01, 12): BEVERAGE CONTAINERS - RETURNING NONRETURNABLES - MORE THAN 100

did return or attempt to return to a dealer for a refund, more than 100 nonreturnable beverage containers, that the person knew or should have known did not have a deposit paid for them at the time of purchase; contrary to MCL 445.574a(2)(b). [445.574A2B-A]

MISDEMEANOR: 93 Days and/or \$500.00

COUNT 18 DEFENDANT(S) (01, 12): BEVERAGE CONTAINERS - RETURNING NONRETURNABLES - MORE THAN 100

did return or attempt to return to a dealer for a refund, more than 100 nonreturnable beverage containers, that the person knew or should have known did not have a deposit paid for them at the time of purchase; contrary to MCL 445.574a(2)(b). [445.574A2B-A]

MISDEMEANOR: 93 Days and/or \$500.00

COUNT 19 DEFENDANT(S) (01, 12): BEVERAGE CONTAINERS - RETURNING NONRETURNABLES - MORE THAN 100

did return or attempt to return to a dealer for a refund, more than 100 nonreturnable beverage containers, that the person knew or should have known did not have a deposit paid for them at the time of purchase; contrary to MCL 445.574a(2)(b). [445.574A2B-A]

MISDEMEANOR: 93 Days and/or \$500.00

COUNT 20 DEFENDANT(S) (01, 12): BEVERAGE CONTAINERS - RETURNING NONRETURNABLES - MORE THAN 100

did return or attempt to return to a dealer for a refund, more than 100 nonreturnable beverage containers, that the person knew or should have known did not have a deposit paid for them at the time of purchase; contrary to MCL 445.574a(2)(b). [445.574A2B-A]

MISDEMEANOR: 93 Days and/or \$500.00

COUNT 21 DEFENDANT(S) (01, 12): BEVERAGE CONTAINERS - RETURNING NONRETURNABLES - MORE THAN 100

did return or attempt to return to a dealer for a refund, more than 100 nonreturnable beverage containers, that the person knew or should have known did not have a deposit paid for them at the time of purchase; contrary to MCL 445.574a(2)(b). [445.574A2B-A]

MISDEMEANOR: 93 Days and/or \$500.00

COUNT 22 DEFENDANT(S) (02): FALSE PRETENSES - \$1,000.00 OR MORE BUT LESS THAN \$20,000.00

did, with the intent to defraud or cheat, make or use a false pretense to obtain from a person money, personal property, or the use of an instrument, facility, article, or other valuable thing or service, having a value of \$1,000.00 or more but less than \$20,000.00; contrary to MCL 750.218(4)(a). [750.2184A]

FELONY: 5 Years and/or \$10,000.00, or 3 times the value of the money or property involved, whichever is greater

COUNT 23 DEFENDANT(S) (02): BEVERAGE CONTAINERS - RETURNING NONRETURNABLES - MORE THAN 100

THAN 100

did return or attempt to return to a dealer for a refund, more than 100 nonreturnable beverage containers, that the person knew or should have known did not have a deposit paid for them at the time of purchase; contrary to MCL 445.574a(2)(b). [445.574A2B-A]

MISDEMEANOR: 93 Days and/or \$500.00

COUNT 24 DEFENDANT(S) (03): FALSE PRETENSES - \$1,000.00 OR MORE BUT LESS THAN \$20,000.00

did, with the intent to defraud or cheat, make or use a false pretense to obtain from a person money, personal property, or the use of an instrument, facility, article, or other valuable thing or service, having a value of \$1,000.00 or more but less than \$20,000.00; contrary to MCL 750.218(4)(a). [750.2184A]

FELONY: 5 Years and/or \$10,000.00, or 3 times the value of the money or property involved, whichever is greater

COUNT 25 DEFENDANT(S) (03): FALSE PRETENSES - \$1,000.00 OR MORE BUT LESS THAN \$20,000.00

did, with the intent to defraud or cheat, make or use a false pretense to obtain from a person money, personal property, or the use of an instrument, facility, article, or other valuable thing or service, having a value of \$1,000.00 or more but less than \$20,000.00; contrary to MCL 750.218(4)(a). [750.2184A]

FELONY: 5 Years and/or \$10,000.00, or 3 times the value of the money or property involved, whichever is greater

COUNT 26 DEFENDANT(S) (03): BEVERAGE CONTAINERS - RETURNING NONRETURNABLES - MORE THAN 100

did return or attempt to return to a dealer for a refund, more than 100 nonreturnable beverage containers, that the person knew or should have known did not have a deposit paid for them at the time of purchase; contrary to MCL 445.574a(2)(b). [445.574A2B-A]

MISDEMEANOR: 93 Days and/or \$500.00

COUNT 27 DEFENDANT(S) (03): BEVERAGE CONTAINERS - RETURNING NONRETURNABLES - MORE THAN 100

did return or attempt to return to a dealer for a refund, more than 100 nonreturnable beverage containers, that the person knew or should have known did not have a deposit paid for them at the time of purchase; contrary to MCL 445.574a(2)(b). [445.574A2B-A]

MISDEMEANOR: 93 Days and/or \$500.00

COUNT 28 DEFENDANT(S) (04): CRIMINAL ENTERPRISES - CONDUCTING

being a person employed by or associated with an enterprise, to wit: Value Foods Supermarket, did knowingly conduct or participate in the affairs of the enterprise directly or indirectly through a pattern of racketeering activity, consisting of two or more of the following incidents of racketeering, to wit:

on or about March 14, 2007, in Ypsilanti, Michigan, defendant did aid or abet in the commission of the following offense for financial gain, to wit: did with the intent to defraud or cheat another person by false pretense obtain from a person money, personal property, or the use of an instrument, facility, article, or other valuable thing or service;

and on or about April 4, 2007, in Ypsilanti, Michigan, defendant did aid or abet in the commission of the following offense for financial gain, to wit: did with the intent to defraud or cheat another person by false pretense obtain from a person money, personal property, or the use of an instrument, facility, article, or other valuable thing or service,

and on or about April 17, 2007, in Ypsilanti, Michigan, defendant did aid or abet in the commission of the following offense for financial gain, to wit: did with the intent to defraud or cheat another person by false pretense obtain from a person money, personal property, or the use of an instrument, facility, article, or other valuable thing or service, which are interrelated by the common scheme of defrauding the Michigan Department of Treasury, and which amount to or pose a threat of continued criminal activity; contrary to MCL 750.159(1). [750.15911]

FELONY: 20 Years and/or \$100,000.00; criminal forfeiture of proceeds, substituted proceeds, and instrumentalities of racketeering listed on attached notification (see MCL 750.159(4)); court may order court costs, costs of investigation, and/or costs of prosecution

COUNT 29 DEFENDANT(S) (04): FALSE PRETENSES - \$1,000.00 OR MORE BUT LESS THAN \$20,000.00

did, with the intent to defraud or cheat, make or use a false pretense to obtain from a person money, personal property, or the use of an instrument, facility, article, or other valuable thing or service, having a value of \$1,000.00 or more but less than \$20,000.00; contrary to MCL 750.218(4)(a). [750.2184A]

FELONY: 5 Years and/or \$10,000.00, or 3 times the value of the money or property involved, whichever is greater

COUNT 30 DEFENDANT(S) (04): FALSE PRETENSES - \$1,000.00 OR MORE BUT LESS THAN \$20,000.00 did, with the intent to defraud or cheat, make or use a false pretense to obtain from a person money, personal property, or the use of an instrument, facility, article, or other valuable thing or service, having a value of \$1,000.00 or more but less than \$20,000.00; contrary to MCL 750.218(4)(a). [750.2184A]

FELONY: 5 Years and/or \$10,000.00, or 3 times the value of the money or property involved, whichever is greater

COUNT 31 DEFENDANT(S) (04): FALSE PRETENSES - \$1,000.00 OR MORE BUT LESS THAN \$20,000.00 did, with the intent to defraud or cheat, make or use a false pretense to obtain from a person money, personal property, or the use of an instrument, facility, article, or other valuable thing or service, having a value of \$1,000.00 or more but less than \$20,000.00; contrary to MCL 750.218(4)(a). [750.2184A]

FELONY: 5 Years and/or \$10,000.00, or 3 times the value of the money or property involved, whichever is greater

COUNT 32 DEFENDANT(S) (04): BEVERAGE CONTAINERS - RETURNING NONRETURNABLES - MORE THAN 100

did return or attempt to return to a dealer for a refund, more than 100 nonreturnable beverage containers, that the person knew or should have known did not have a deposit paid for them at the time of purchase; contrary to MCL 445.574a(2)(b). [445.574A2B-A]

MISDEMEANOR: 93 Days and/or \$500.00

COUNT 33 DEFENDANT(S) (04): BEVERAGE CONTAINERS - RETURNING NONRETURNABLES - MORE THAN 100

did return or attempt to return to a dealer for a refund, more than 100 nonreturnable beverage containers, that the person knew or should have known did not have a deposit paid for them at the time of purchase; contrary to MCL 445.574a(2)(b). [445.574A2B-A]

MISDEMEANOR: 93 Days and/or \$500.00

COUNT 34 DEFENDANT(S) (04): BEVERAGE CONTAINERS - RETURNING NONRETURNABLES - MORE THAN 100

did return or attempt to return to a dealer for a refund, more than 100 nonreturnable beverage containers, that the person knew or should have known did not have a deposit paid for them at the time of purchase; contrary to MCL 445.574a(2)(b). [445.574A2B-A]

MISDEMEANOR: 93 Days and/or \$500.00

COUNT 35 DEFENDANT(S) (05): CRIMINAL ENTERPRISES - CONDUCTING

being a person employed by or associated with an enterprise, to wit: Value Save Food Center, did knowingly conduct or participate in the affairs of the enterprise directly or indirectly through a pattern of racketeering activity, consisting of two or more of the following incidents of racketeering, to wit:

on or about April 16, 2007, in Detroit, Michigan, defendant did aid or abet in the commission of the following offense for financial gain, to wit: did with the intent to defraud or cheat another person by false pretense obtain from a person money, personal property, or the use of an instrument, facility, article, or other valuable thing or service;

and on or about April 18, 2007, in Detroit, Michigan, defendant did aid or abet in the commission of the following offense for financial gain, to wit: did with the intent to defraud or cheat another person by false pretense obtain from a person money, personal property, or the use of an instrument, facility, article, or other valuable thing or service, which are interrelated by the common scheme of defrauding the Michigan Department of Treasury, and which amount to or pose a threat of continued criminal activity; contrary to MCL 750.159i(1). [750.159i1]

FELONY: 20 Years and/or \$100,000.00; criminal forfeiture of proceeds, substituted proceeds, and instrumentalities of racketeering listed on attached notification (see MCL 750.159j(4)); court may order court costs, costs of investigation, and/or costs of prosecution

COUNT 36 DEFENDANT(S) (05): FALSE PRETENSES - \$1,000.00 OR MORE BUT LESS THAN \$20,000.00 did, with the intent to defraud or cheat, make or use a false pretense to obtain from a person money, personal property, or the use of an instrument, facility, article, or other valuable thing or service, having a value of \$1,000.00 or more but less than \$20,000.00; contrary to MCL 750.218(4)(a). [750.2184A]