

B.

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

Case:2:13-cr-20564  
Judge: Murphy, Stephen J.  
MJ: Randon, Mark A.  
Filed: 07-31-2013 At 11:55 AM  
INDI USA V SEALED MATTER (EB)

UNITED STATES OF AMERICA

v.

- |     |                                       |   |
|-----|---------------------------------------|---|
| D-1 | MOHAMED FARAJ<br>a/k/a "MOJO"         | 21 U.S.C. § 848;<br>21 U.S.C. § 841;    |
| D-2 | ABED FARAJ<br>a/k/a "ABOODI"          | 21 U.S.C. § 846;<br>18 U.S.C. § 924(c); |
| D-3 | FOUAD FARAJ<br>a/k/a "FRED"           | 18 U.S.C. § 922(g);<br>18 U.S.C. § 2    |
| D-4 | MOHAMMED ABDUL ALHAKAMI<br>a/k/a "AK" |   |
| D-5 | ALI AL-HISNAWI<br>a/k/a "MOLEY"       |   |
| D-6 | ADNAN BAZZI<br>a/k/a "EDDIE"          |   |

**INDICTMENT**

THE GRAND JURY CHARGES:

**COUNT ONE**

21 U.S.C. § 848(a) & (c) – *Continuing Criminal Enterprise*

- D-1 MOHAMED FARAJ
- D-2 ABED FARAJ
- D-3 FOUAD FARAJ

From in or about 2009, exact date being approximate, and continuing to the date of this indictment, in the Eastern District of Michigan, and elsewhere, the defendants, MOHAMED FARAJ, ABED FARAJ, and FOUAD FARAJ did unlawfully, knowingly, and intentionally engage in a continuing criminal enterprise in that they unlawfully, knowingly, and intentionally violated Title 21, United States Code, Sections 841(a), 843,

and 846, on three or more occasions which include, but are not limited to the substantive violations alleged more completely in Counts Two and Five of this indictment, as well as Possession with Intent to Distribute Controlled Substances and Distribution of Controlled Substances and Use of a Telecommunications Facility in Furtherance of Drug Trafficking; which Counts and Acts are re-alleged and incorporated herein by reference as though fully set forth in this Count. These and other violations were all part of a continuing series of violations of Subchapter I and II of Title 21, Section 801, et seq., that were undertaken by defendants MOHAMED FARAJ, ABED FARAJ, and FOUAD FARAJ in concert with at least five other persons with respect to whom MOHAMED FARAJ, ABED FARAJ, and FOUAD FARAJ occupied positions of principal administrator, organizer, supervisor, or leader of the enterprise from which continuing series of violations the defendant obtained substantial income and resources.

All in violation of Title 21, United States Code, Section 848(a).

**COUNT TWO**

21 U.S.C. §§ 841(a)(1); 841(b)(1)(B)(vii); 846 – *Conspiracy to Distribute Controlled Substances*

D-1 MOHAMMED FARAJ  
D-2 ABED FARAJ  
D-3 FOUAD FARAJ  
D-4 MOHAMMED ABDUL ALHAKAMI  
D-5 ALI AL-HISNAWI  
D-6 ADNAN BAZZI

From in 2009, exact date being approximate, and continuing until the date of this Indictment, in the Eastern District of Michigan, and elsewhere, defendants MOHAMMED

FARAJ, ABED FARAJ, FOUAD FARAJ, MOHAMMED ABDUL ALHAKAMI, ALI AL-HISNAWI, ADNAN BAZZI and others, known and unknown to the grand jury, did knowingly, intentionally, and unlawfully attempt, combine, conspire, confederate, and agree together and with each other, and with other persons known and unknown to the Grand Jury, to commit an offense against the United States, that is, to possess with intent to distribute and to distribute one hundred (100) kilograms or more of a mixture or substance containing a detectable amount of marijuana, a Schedule I controlled substance, amphetamine and dextroamphetamine, Schedule II controlled substances, hydrocodone (Vicodin), a Schedule III controlled substance, alprazolam (Xanax) and carisoprodol (Soma), Schedule IV controlled substances, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B)(vii), 841(b)(1)(C); 841(b)(1)(E); and 846.

**Manner and Means**

1. It was part of the conspiracy that Mohamed Faraj, Abed Faraj, and Fouad Faraj established a drug trafficking organization which distributes quantities of marijuana in distinctive plastic vials with white caps as well as prescription pills. Mohamed Faraj, Abed Faraj, and Fouad Faraj acted as leaders, managers, and/or supervisors of the organization. The Faraj brothers further organized their operation by having a "street captain" always responsible for the distribution of narcotics and normally the "drug phone" used by customers to arrange narcotics transactions. This "street captain" was in turn responsible for the "street workers," or the individuals actually distributing the narcotics to their customers. The organization would normally employ teenagers or young adult men as their "street workers."

2. It was part of the conspiracy that the defendants strove to control the 6800 block of Rutherford Street, Detroit, Michigan, as their "turf," or area of operations, by maintaining a regular presence on this block in order to distribute controlled substances, specifically marijuana and prescription pills. The 6800 block of Rutherford Street is bordered by W. Warren Avenue on the north and Whitlock Street on the south. Detroit Public School, Gardner Elementary, stands at the southwest corner of Rutherford and Whitlock Streets. Such acts include but are not limited to:

a. Defendant Fouad Faraj maintaining houses at 6865 and 6871 Rutherford Street for members of the conspiracy to use as "safe" houses in the event of law enforcement activity on the 6800 block of Rutherford Street, Detroit, Michigan.

b. On or about October 27, 2009, defendant Mohammed Abdul Alhakami possessed approximately 95 vials of marijuana and 3 vials of hydrocodone pills (Vicodin) at 6898 Rutherford Street, Detroit, Michigan, and another vacant house on that block.

c. On or about December 17, 2009, defendant Mohamed Faraj and others possessed 74 vials of marijuana at 6882 and 6862 Rutherford Street, Detroit, Michigan.

d. On or about February 4, 2010, an unindicted street captain was distributing vials of marijuana on Rutherford Street, Detroit, Michigan.

3. Beginning in approximately spring 2010, the organization began to take certain steps in order to thwart the increased law enforcement activity on the 6800 block of Rutherford Street, Detroit, Michigan. Consequently, defendant Mohamed Faraj merged narcotics distribution operations with defendant Adnan Bazzi. Mohamed Faraj

instructed his street captain and workers to refer prescription pill customers to Adnan Bazzi. The organization also began to move its marijuana distribution operation around to various locations in the greater Warrendale neighborhood of the city of Detroit. The greater Warrendale neighborhood is bordered by the Southfield Freeway to the west, Greenfield to the east, Tireman Street to the north, and Paul Street to the south. Such acts include but are not limited to:

- a. On or about March 11, 2010, an unindicted co-conspirator was distributing marijuana in front of 6787 Montrose Street, Detroit, Michigan.
- b. On or about March 25, 2010, defendant Adnan Bazzi and an unindicted street captain and street worker distributed marijuana and hydrocodone (Vicodin) pills from the "Tipperary Pub," located at 8287 Southfield Freeway, Detroit, Michigan.
- c. On or about September 9, 2010, Mohammed Abdul Alhakami distributed vials of marijuana in the alley behind the storefronts of W. Warren Avenue between Rutherford and Mansfield Streets in Detroit, Michigan.
- d. On or about September 10, 2010, an unindicted street worker possessed approximately 30 vials of marijuana in an alleyway between the 6800 blocks of Rutherford and Mansfield Streets in Detroit, Michigan.
- e. On or about September 11, 2010, an unindicted street worker distributed vials of marijuana in the alley behind the storefronts of W. Warren Avenue between Rutherford and Mansfield Streets in Detroit, Michigan.
- f. On or about November 9, 2010, an unknown organization member answered a phone call to (313) 575-8382 and instructed a law enforcement confidential

informant to come to 7411 Rutherford Street, Detroit, Michigan in order to buy marijuana.

g. On or about January 25, 2011, defendant Ali Al-Hisnawi possessed approximately 22 vials of marijuana, \$207 in cash, and two cell phones at 5751 Greenview Street, Detroit, Michigan.

h. Between on or about February 5 – 22, 2011, defendant Adnan Bazzi distributed marijuana and prescription pills at 6724 Memorial Street, Detroit, Michigan.

i. On or about February 22, 2011, defendant Adnan Bazzi possessed distributable amounts of marijuana, a digital scale, ledgers, a cell phone, plastic baggies, approximately 1,500 carisoprodol pills (Somas), 155 amphetamine and dextroamphetamine pills, 87 alprazolam pills (Xanax), 12 hydrocodone pills (Vicodin), and \$2,241 in cash at 6724 and 6736 Memorial Street, Detroit, Michigan.

j. On or about April 13, 2011, defendant Mohamed Faraj possessed vials of marijuana, approximately \$1,884 in cash, and one cell phone at 6522 Longacre Street, Detroit, Michigan.

k. In or about April 2011, the organization began to use the residence at 6850 Auburn Street, Detroit, Michigan, as a location to store illegal narcotics and to conduct narcotics transactions.

l. In or about June 2011, the organization began to use the residence at 6213 Rosemont Street, Detroit, Michigan as a location to store illegal narcotics.

m. On or about May 9, 2013, an unindicted street worker for the organization possessed 14 vials of marijuana and \$202 in cash in the vicinity of Abington Street and W. Warren Avenue, Detroit, Michigan.

n. On or about May 27, 2013, an unindicted street worker for the organization possessed 24 vials of marijuana and \$316 in cash on the 6800 block of Abington Street, Detroit, Michigan.

o. On or about May 28, 2013, an unindicted street worker for the organization possessed 15 vials of marijuana and \$389 in cash at 6856 Rutherford Street, Detroit, Michigan.

p. On or about June 24, 2013, Ali Al-Hisnawi possessed vials of marijuana.

4. It was further part of the conspiracy, in an attempt to thwart law enforcement activity and to avoid the seizure of the organization's illegal narcotics, narcotics proceeds, and firearms in one law enforcement action, Mohamed Faraj and Ali Al-Hisnawi agreed to intentionally set fire to houses in the area and then use them as separate store houses for illegal narcotics, narcotics proceeds, and firearms.

5. It was further part of the conspiracy that the defendants, with others known and unknown to the Grand Jury, agreed to purchase, maintain, and circulate a collection of firearms in order to protect their illegal narcotics and narcotics proceeds, as well as to protect their turf. Such acts included but are not limited to:

a. On or about October 13, 2009, an unidentified co-conspirator sat in a second floor window of the vacant house at 6885 Rutherford Street with a firearm.

b. On or about October 27, 2009, defendant Mohammed Abdul Alhakami possessed an assault rifle, serial number 11357899, and ammunition at 6898 Rutherford Street, Detroit, Michigan.

c. On or about November 4, 2009, a loaded 9mm handgun, serial number TVA44487, was found stored at 6877 Rutherford Street, Detroit, Michigan.

d. On or about February 4, 2010, defendant Fouad Faraj possessed a Mossburg shotgun, serial number K593092, at 6865 Rutherford Street, Detroit, Michigan.

e. On or about September 9, 2010, an unindicted street worker of the organization possessed a ROMARM/CUGIR, model DRACO, 7.62mm x 39mm caliber, semi-automatic pistol, serial number DR-8650-10, in the vicinity of the alley behind the storefronts of W. Warren Avenue between Rutherford and Mansfield Streets in Detroit, Michigan.

f. On or about February 22, 2011, defendant Adnan Bazzi possessed a loaded FEG 9mm semi-automatic pistol, model P9R, serial number R23793, at 6736 Memorial Street, Detroit, Michigan.

6. It was further part of the conspiracy that the defendants, with others known and unknown to the Grand Jury, agreed that acts of violence and intimidation would be committed by themselves and other co-conspirators against rival narcotics dealers or members of the community as deemed necessary to continue their illegal narcotic activities. Such acts included but are not limited to:

a. In or about May 2010, defendant Abed Faraj, along with another unknown individual, physically assaulted an unindicted street captain who refused to



break Mahmoud Harajli's arm after ordered to by defendants Mohamed and Abed Faraj since Mohamed Faraj believed that Harajli had provided information to the police about the organization's activities.

b. In or about May 2010, an unindicted street captain broke both of Mahmoud Harajli's arms by striking them with a 2x4 board.

c. On or about July 5, 2010, defendant Ali Al-Hisnawi, at the direction of defendant Mohamed Faraj, set fire to a building on the south side of the 16000 block of W. Warren Avenue, Detroit, Michigan in order to allow the organization's customers less restricted access to the alleyway behind the businesses on W. Warren. Multiple business fronts were burned in this fire.

7. It was further part of the conspiracy that the organization maintained one phone number [(313) 575-8382] as its primary "drug phone," i.e. the phone number their customers could call to facilitate narcotics transactions, from approximately 2009 through the date of this indictment.

All in violation of Title 21, United States Code, Section 841(a)(1) and 846.

**COUNT THREE**

18 U.S.C. §§ 924(c), 2 – *Possession of a Firearm in Furtherance of Drug Trafficking Offense*

D-1 MOHAMMED FARAJ  
D-2 ABED FARAJ  
D-3 FOUAD FARAJ  
D-4 MOHAMMED ABDUL ALHAKAMI  
D-6 ADNAN BAZZI

From in or about 2009, exact date being approximate, and continuing to on or about the date of this Indictment, in the Eastern District of Michigan, Southern Division,

MOHAMMED FARAJ, ABED FARAJ, FOUAD FARAJ, MOHAMMED ABDUL ALHAKAMI, and ADNAN BAZZI, did aid and abet each other and others known and unknown to the Grand Jury, and did knowingly, intentionally, and unlawfully possess firearms, including but not limited to, a 9mm handgun, serial number TVA44487, an assault rifle, serial number 11357899, a ROMARM/CUGIR, model DRACO, 7.62mm x 39mm caliber, semi-automatic pistol, serial number DR-8650-10, a Mossburg shotgun, serial number K593092, and a FEG 9mm semi-automatic pistol, model P9R, serial number R23793, among others, in furtherance of a drug trafficking offense for which they may be prosecuted in a court of the United States, that is, conspiracy to possess with intent to deliver controlled substances as alleged in Count Two; in violation of Title 18, United States Code, Sections 924(c) and 2.

**COUNT FOUR**

18 U.S.C. §§ 922(g) – *Felon in Possession of Firearm*

D-6 ADNAN BAZZI

On or about February 22, 2011, in the Eastern District of Michigan, Southern Division, and elsewhere, defendant ADNAN BAZZI, having previously been convicted of a felony, did knowingly, intentionally, and unlawfully possess a firearm, that is, a FEG 9mm semi-automatic pistol, model P9R, serial number R23793, said firearm having previously traveled in interstate commerce; in violation of Title 18, United States Code, Section 922(g).

**COUNT FIVE**

21 U.S.C. § 843(b) – *Use of Communication Facility in Facilitating the Commission of Violations of the Controlled Substance Act*

D-1 MOHAMED FARAJ

From in or about 2009, exact date being approximate, and continuing to on or about the date of this Indictment, in the Eastern District of Michigan, Southern Division, MOHAMED FARAJ, knowingly and intentionally, on numerous occasions, used a communication facility, to wit: a telephone, in causing or facilitating the commission of acts constituting a felony under the Controlled Substances Act, to wit: conspiracy to distribute controlled substances, in violation of 21 U.S.C. §846.

All in violation of Title 21, United States Code, Section 843(b).

**FORFEITURE ALLEGATIONS**

Pursuant to Fed.R.Cr.P. 32.2(a), 21 U.S.C. §853, 18 U.S.C. §924(d), and 28 U.S.C. §2461(c), the government hereby provides notice to the defendant(s) of its intention to seek forfeiture of all proceeds, direct or indirect, or property traceable thereto, all property that facilitated the commission of the violations alleged, or property traceable thereto, and all property involved in, or property traceable thereto, of the violations set forth in this Indictment.

If any of the property subject to forfeiture, as a result of any act or omission of the defendant(s):

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;

- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p).

A TRUE BILL

/s/ Grand Jury Foreperson  
GRAND JURY FOREPERSON

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United States District Court Eastern District of Michigan	<b>Criminal Case Cover</b>
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NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it accurately in all respects.

**Reassignment/Recusal Information** This matter was opened in the USAO prior to August 15, 2008 [ ]

<b>Companion Case Information</b>	Companion Case Number:
This may be a companion case based upon LCrR 57.10 (b)(4) <sup>1</sup> :	Judge Assigned:
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	AUSA's Initials:

Case Title: USA v. Mohamed Faraj, et al.

County where offense occurred : Wayne County and Elsewhere

Check One:  Felony  Misdemeanor  Petty

- Indictment/  Information --- no prior complaint.
- Indictment/  Information --- based upon prior complaint [Case number: \_\_\_\_\_ ]
- Indictment/  Information --- based upon LCrR 57.10 (d) [Complete Superseding section below].

**Superseding Case Information**

Superseding to Case No: \_\_\_\_\_ Judge: \_\_\_\_\_

- Original case was terminated; no additional charges or defendants.
- Corrects errors; no additional charges or defendants.
- Involves, for plea purposes, different charges or adds counts.
- Embraces same subject matter but adds the additional defendants or charges below:

<u>Defendant name</u>	<u>Charges</u>	<u>Prior Complaint (if applicable)</u>
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Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.

July 31, 2013  
 \_\_\_\_\_  
 Date

/s/ Christopher Graveline  
 \_\_\_\_\_  
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<sup>1</sup> Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.