

SUPERIOR COURT OF N.J.
REC'D

JAN 11 2006

DONALD F. PUGHAN
CLERK

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

State Grand Jury
Number SGJ518-06-10
Superior Court
Docket Number 06-01-00003-S

STATE OF NEW JERSEY)

v.)

SHAHIN KAYED)
also known as Mustafa)

RIZEK KAYED)
also known as Ricky)

MOHAMMAD AWADALLA)
also known as Mike)

GAZI NASSRALLAH)
also known as Jino)

SIYAM KAYED)
also known as Sammy)

BELAL DALIA)

and)

RIBHI MUSTAFA)
also known as Ray)

INDICTMENT

The Grand Jurors of and for the State of New Jersey, upon their oaths, present that:

COUNT ONE

(Conspiracy - First Degree)

SHAHIN KAYED

RIZEK KAYED

MOHAMMAD AWADALLA

GAZI NASSRALLAH

SIYAM KAYED

BELAL DALIA

and

RIBHI MUSTAFA

between on or about October 1, 1999 and in or about July 2004, at the Township of North Bergen, in the County of Hudson, and in the States of New York, Pennsylvania and Maryland, elsewhere, and within the jurisdiction of this Court, with the purpose of promoting or facilitating the crimes of theft by deception and money laundering, did agree that:

A. One or more of them knowingly would engage in conduct which would constitute the aforesaid crimes, or

B. One or more of them would aid in the planning, solicitation or commission of said crimes, that is:

1. Theft by Deception in that they would purposely obtain the property of others by deception, the amount of such theft aggregating in excess of \$75,000, contrary to the provisions of N.J.S.A. 2C:20-4; and,

2. Money Laundering in that they would direct, organize, finance, plan, manage, supervise, or control the transportation of or transactions in property known to be derived from criminal activity, in an amount of \$500,000 or more, contrary to the provisions of N.J.S.A. 2C:21-25;

All in violation of the provisions of N.J.S.A. 2C:5-2, and against the peace of this State, the government and dignity of the same.

COUNT TWO

(Theft by Deception - Second Degree)

SHAHIN KAYED

RIZEK KAYED

MOHAMMAD AWADALLA

GAZI NASSRALLAH

SIYAM KAYED

BELAL DALIA

and

RIBHI MUSTAFA

between on or about October 1, 1999 and in or about July 2004, at the Township of North Bergen, in the County of Hudson, and in the States of New York, Pennsylvania, and Maryland, elsewhere, and within the jurisdiction of this Court, did purposely obtain the property of another in an amount of \$75,000 or more by deception, that is, the said SHAHIN KAYED, RIZEK KAYED, MOHAMMAD AWADALLA, GAZI NASSRALLAH, SIYAM KAYED, BELAL DALIA and RIBHI MUSTAFA did engage in a coupon fraud scheme in which they purposely obtained \$75,000 or more by creating or reinforcing the false impression that certain retail stores, whose identities are known to the Grand Jurors, were entitled to receive payments for coupons;

WHEREAS IN TRUTH AND IN FACT, as the said SHAHIN KAYED, RIZEK KAYED, MOHAMMAD AWADALLA, GAZI NASSRALLAH, SIYAM KAYED, BELAL DALIA and RIBHI MUSTAFA well knew, the said retail stores were not

entitled to receive payments for coupons, contrary to the provisions of N.J.S.A. 2C:20-4 and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT THREE

(Money Laundering - First Degree)

SHAHIN KAYED

RIZEK KAYED

MOHAMMAD AWADALLA

GAZI NASSRALLAH

SIYAM KAYED

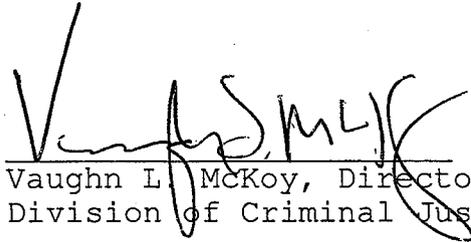
BELAL DALIA

and

RIBHI MUSTAFA

between on or about October 1, 1999 and in or about July, 2004, at the Township of North Bergen, in the County of Hudson, and in the States of New York, Pennsylvania, and Maryland, elsewhere, and within the jurisdiction of this Court, did direct, organize, finance, plan, manage, supervise, or control the transportation of or transactions in property known to be derived from criminal activity, in an amount of \$500,000 or more, that is, the said SHAHIN KAYED, RIZEK KAYED, MOHAMMAD AWADALLA, GAZI NASSRALLAH, SIYAM KAYED, BELAL DALIA and RIBHI MUSTAFA did direct, organize, finance, plan, manage, supervise, or control the transportation of coupon checks or transactions of negotiating coupon checks, in an aggregate amount of \$500,000 or more, which they knew to be derived through a coupon fraud scheme which constituted theft by deception, contrary to the

provisions of N.J.S.A. 2C:21-25c and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.


Vaughn L. McKoy, Director
Division of Criminal Justice

A TRUE BILL:

William J. Orsini
Foreperson

Dated: 1/11/06

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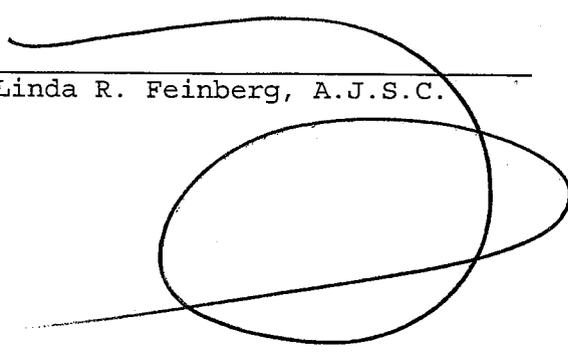
ORDER OF VENUE

An Indictment having been returned to this Court by the State Grand Jury in the above captioned matter,

IT IS ORDERED on this 11th day of January, 2006, pursuant to paragraph 8 of the State Grand Jury Act, that the County of Hudson be and hereby is designated as the County of venue for the purpose of trial.

IT IS FURTHER ORDERED that the Clerk of the Superior Court shall transmit forthwith the Indictment in this matter and a

certified copy of this Order to the Criminal Division Manager of the County
of Hudson County for filing.



Linda R. Feinberg, A.J.S.C.