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UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

Case:2:09-cr-20192  
Judge: Roberts, Victoria A  
MJ: Komives, Paul J  
Filed: 05-06-2009 At 12:13 PM  
IND USA VS MANNI ET AL (LH)

VIOLATIONS: 18 U.S.C. §§ 224  
and 1952.

- D-1 GHAZI MANNI,
- D-2 MITCHELL EDWARD KARAM,
- D-3 ADAM RYAN CUOMO,
- D-4 KEITH JUNIOR TRIPLETT,
- D-5 ANTON DU'ANE CURRIE,
- D-6 KASHIF LASHON PAYNE,
- D-7 HARVEY LAMONT McDOUGLE JR., and
- D-8 QUINTON JAMES BROUSSARD,

Defendants.

**INDICTMENT**

THE GRAND JURY CHARGES THAT:

**COUNT ONE.**

**(18 U.S.C. § 224(a) - Conspiracy to Influence Sporting Contests by Bribery)**

- D-1 GHAZI MANNI
- D-2 MITCHELL EDWARD KARAM
- D-3 ADAM RYAN CUOMO
- D-4 KEITH JUNIOR TRIPLETT
- D-5 ANTON DU'ANE CURRIE
- D-6 KASHIF LASHON PAYNE
- D-7 HARVEY LAMONT McDOUGLE JR.
- D-8 QUINTON JAMES BROUSSARD

A. GENERAL ALLEGATIONS.

At all times material to this Indictment:

1. The principal activity of individual bookmakers and bookmaking businesses consisted of accepting and recording wagers on sporting contests, paying monies to bettors who placed winning wagers, and collecting monies from bettors who placed losing wagers. Individual bookmakers and bookmaking businesses ordinarily used a "point spread" so that bettors could place wagers based on the point spread of a sporting contest rather than simply betting on which team would win. The point spread was the predicted scoring difference between the two opponents in a sporting contest. The point spread defined which team was the favorite, and which team was the "underdog," that is, the predicted losing team. In order for a bettor to win a wager placed on the favorite team, the favorite team had to win by more than the spread number. In order for a bettor to win a wager placed on the "underdog" team, the "underdog" team had to either win the contest outright, or lose by less than the spread number. For example, if Team A was the "underdog" team by three points, then a bettor who bet on Team A would have won the wager if Team A either won the game outright, or if Team A lost the game by one or two points.

2. A football or basketball game could be "fixed" by, among other ways, a player's agreement to influence the game's outcome by deliberately limiting the number of points scored by his team so that people gambling on the score of the game can profit. Such a scheme, customarily called "point shaving," entailed an effort by a player who was usually a member of the favorite team to ensure by their play during the game, or by some other means, that their team scored only a certain number of points during the game. The number of points to be scored was determined by what the point spread was on that particular game.

B. THE CONSPIRACY.

1. From at least in or about December 2004, and continuing through at least in or about December 2006, in the Eastern District of Michigan and elsewhere, GHAZI MANNI, MITCHELL EDWARD KARAM, ADAM RYAN CUOMO, KEITH JUNIOR TRIPLETT, ANTON DU'ANE CURRIE, KASHIF LASHON PAYNE, HARVEY LAMONT McDOUGLE JR., and QUINTON JAMES BROUSSARD, Defendants herein, did unlawfully, knowingly and intentionally combine, conspire, confederate and agree with each other, and with persons known and unknown to the Grand Jury, to carry into effect a scheme in commerce to influence by bribery various sporting contests, that is, football games and basketball games between the University of Toledo men's football and basketball teams and various opponents, with knowledge that the purpose of such scheme was to influence by bribery those contests.

C. MANNER, MEANS AND METHODS OF THE CONSPIRACY.

The manner, means and methods employed by the defendants, GHAZI MANNI, MITCHELL EDWARD KARAM, ADAM RYAN CUOMO, KEITH JUNIOR TRIPLETT, ANTON DU'ANE CURRIE, KASHIF LASHON PAYNE, HARVEY LAMONT McDOUGLE JR., and QUINTON JAMES BROUSSARD, and other persons known and unknown to the Grand Jury, to effect the objects of the conspiracy were as follows:

1. It was a part of the conspiracy that GHAZI MANNI, MITCHELL EDWARD KARAM, ADAM RYAN CUOMO, KEITH JUNIOR TRIPLETT, ANTON DU'ANE CURRIE, KASHIF LASHON PAYNE, HARVEY LAMONT McDOUGLE JR., and QUINTON JAMES BROUSSARD, Defendants herein, and other persons known and unknown to the Grand Jury, did agree upon and carry into effect a "point shaving" scheme to "fix" University of Toledo men's

football and basketball games during the time period from at least in or about Fall 2004 until in or about Fall 2006.

2. It was further a part of the conspiracy that GHAZI MANNI, and MITCHELL EDWARD KARAM, Defendants herein, would and did directly and indirectly pay money, and other things of value, to ANTON DU'ANE CURRIE, KASHIF LASHON PAYNE, HARVEY LAMONT McDOUGLE JR., and QUINTON JAMES BROUSSARD, Defendants herein, and other persons known and unknown to the Grand Jury, in return for providing information to them which information was not in the public domain and which related to the likely performance of the University of Toledo men's football and basketball teams and their opponents in various sporting contests, for the purpose of deciding whether an attempt should be made to "fix" a particular game in order to generate money for the conspirators.

3. It was further a part of the conspiracy that GHAZI MANNI and MITCHELL EDWARD KARAM, Defendants herein, would and did directly and indirectly pay money and other things of value to ADAM RYAN CUOMO, KEITH JUNIOR TRIPLETT, HARVEY LAMONT McDOUGLE JR., and QUINTON JAMES BROUSSARD, Defendants herein, and other persons known and unknown to the Grand Jury, in return for facilitating the "point shaving" scheme to "fix" University of Toledo men's football and basketball games by aiding in attempting to recruit other University of Toledo men's football and men's basketball team members to join the conspiracy.

4. It was further a part of the conspiracy that GHAZI MANNI and MITCHELL EDWARD KARAM, Defendants herein, would and did directly and indirectly pay money and other things of value to KEITH JUNIOR TRIPLETT, ANTON DU'ANE CURRIE, KASHIF

LASHON PAYNE, and QUINTON JAMES BROUSSARD, Defendants herein, and other persons known and unknown to the Grand Jury, in return for these members using their ability as players to control events during games to attempt to ensure that the University of Toledo teams would score a certain number of points determined by the point spread.

5. It was further a part of the conspiracy that KEITH JUNIOR TRIPLETT, ANTON DU'ANE CURRIE, KASHIF LASHON PAYNE, and QUINTON JAMES BROUSSARD, Defendants herein, and other persons known and unknown to the Grand Jury, would and did receive and accept, and agree to receive and accept, money and other things of value in return for being induced to use their abilities as players to control events during games to attempt to ensure that the University of Toledo teams would score a certain number of points determined by the point spread.

6. It was further a part of the conspiracy that GHAZI MANNI, Defendant herein, would and did use interstate telephone facilities between Michigan and Ohio and elsewhere to converse with ADAM RYAN CUOMO, KEITH JUNIOR TRIPLETT, ANTON DU'ANE CURRIE, KASHIF LASHON PAYNE, HARVEY LAMONT McDOUGLE JR., and QUINTON JAMES BROUSSARD, Defendants herein.

7. It was further a part of the conspiracy that GHAZI MANNI and MITCHELL EDWARD KARAM, Defendants herein, would and did use interstate telephone facilities between Michigan and elsewhere to place wagers on certain University of Toledo men's football and basketball games, knowing that these games were "fixed," to obtain money for the conspirators in the "point shaving" scheme.

8. It was further a part of the conspiracy that on or about Sunday, November 20, 2005,

GHAZI MANNI and MITCHELL EDWARD KARAM, Defendants herein, would and did wager approximately \$42,000 on the outcome of the men's basketball game between the University of Toledo and the University of South Carolina.

9. It was further a part of the conspiracy that on or about Sunday, November 27, 2005, GHAZI MANNI and MITCHELL EDWARD KARAM, Defendants herein, would and did wager approximately \$10,000 on the outcome of the men's basketball game between the University of Toledo and Southern Methodist University.

10. It was further a part of the conspiracy that on or about Saturday, December 3, 2005, GHAZI MANNI and MITCHELL EDWARD KARAM, Defendants herein, would and did wager approximately \$10,000 on the outcome of the men's basketball game between the University of Toledo and Northern Illinois University.

11. It was further a part of the conspiracy that on or about Saturday, December 17, 2005, GHAZI MANNI and MITCHELL EDWARD KARAM, Defendants herein, would and did wager approximately \$44,000 on the outcome of the men's basketball game between the University of Toledo and St. Bonaventure University.

12. It was further a part of the conspiracy that on or about Wednesday, December 21, 2005, GHAZI MANNI and MITCHELL EDWARD KARAM, Defendants herein, would and did wager approximately \$21,000 on the outcome of the men's basketball game between the University of Toledo and East Carolina University.

13. It was further a part of the conspiracy that on or about Wednesday, January 4, 2006, GHAZI MANNI and MITCHELL EDWARD KARAM, Defendants herein, would and did wager approximately \$10,000 on the outcome of the men's basketball game between the University of

Toledo and Kent State University.

14. It was further a part of the conspiracy that on or about Saturday, January 7, 2006, GHAZI MANNI and MITCHELL EDWARD KARAM, Defendants herein, would and did wager approximately \$15,000 on the outcome of the men's basketball game between the University of Toledo and the University of Akron.

15. It was further a part of the conspiracy that on or about Sunday, January 15, 2006, GHAZI MANNI and MITCHELL EDWARD KARAM, Defendants herein, would and did wager approximately \$17,000 on the outcome of the men's basketball game between the University of Toledo and Bowling Green State University.

16. It was further a part of the conspiracy that on or about Wednesday, January 18, 2006, GHAZI MANNI and MITCHELL EDWARD KARAM, Defendants herein, would and did wager approximately \$21,000 on the outcome of the men's basketball game between the University of Toledo and Miami University (of Ohio).

17. It was further a part of the conspiracy that on or about Tuesday, January 24, 2006, GHAZI MANNI and MITCHELL EDWARD KARAM, Defendants herein, would and did wager approximately \$40,000 on the outcome of the men's basketball game between the University of Toledo and Northern Illinois University.

18. It was further a part of the conspiracy that on or about Wednesday, February 1, 2006, GHAZI MANNI and MITCHELL EDWARD KARAM, Defendants herein, would and did wager approximately \$40,000 on the outcome of the men's basketball game between the University of Toledo and Western Michigan University.

19. It was further a part of the conspiracy that on or about Saturday, February 4, 2006,

GHAZI MANNI and MITCHELL EDWARD KARAM, Defendants herein, would and did wager approximately \$20,500 on the outcome of the men's basketball game between the University of Toledo and Central Michigan University.

20. It was further a part of the conspiracy that on or about Tuesday, February 7, 2006, GHAZI MANNI and MITCHELL EDWARD KARAM, Defendants herein, would and did wager approximately \$20,000 on the outcome of the men's basketball game between the University of Toledo and Kent State University.

21. It was further a part of the conspiracy that on or about Saturday, February 18, 2006, GHAZI MANNI and MITCHELL EDWARD KARAM, Defendants herein, would and did wager approximately \$30,000 on the outcome of the men's basketball game between the University of Toledo and the University of Detroit Mercy.

22. It was further a part of the conspiracy that on or about Monday, November 20, 2006, GHAZI MANNI and MITCHELL EDWARD KARAM, Defendants herein, would and did wager approximately \$25,000 on the outcome of the men's basketball game between the University of Toledo and Virginia Commonwealth University.

23. It was further a part of the conspiracy that on or about Saturday, December 2, 2006, GHAZI MANNI and MITCHELL EDWARD KARAM, Defendants herein, would and did wager approximately \$21,000 on the outcome of the men's basketball game between the University of Toledo and Vanderbilt University.

24. It was further a part of the conspiracy that on or about Tuesday, December 19, 2006, GHAZI MANNI and MITCHELL EDWARD KARAM, Defendants herein, would and did wager approximately \$21,000 on the outcome of the men's basketball game between the University of



Toledo and the University of Detroit Mercy.

D. OVERT ACTS.

In furtherance of the conspiracy, and to effect the object thereof, the Defendants and their co-conspirators committed and caused to be committed the following overt acts, among others, in the Eastern District of Michigan and elsewhere:

1. On or about Saturday, November 19, 2005, at approximately 1:50 p.m., ADAM RYAN CUOMO, Defendant herein, had a telephone conversation with GHAZI MANNI, Defendant herein.

2. On or about Saturday, November 19, 2005, at approximately 9:52 p.m., HARVEY LAMONT McDOUGLE JR., Defendant herein, had a telephone conversation with GHAZI MANNI, Defendant herein.

3. On or about Saturday, November 19, 2005, at approximately 9:59 p.m., HARVEY LAMONT McDOUGLE JR., Defendant herein, had a telephone conversation with GHAZI MANNI, Defendant herein.

4. On or about Sunday, November 20, 2005, at approximately 11:32 a.m., GHAZI MANNI, Defendant herein, had a telephone conversation with Samuel Aviles Villegas.

5. On or about Sunday, November 20, 2005, at approximately 12:11 p.m., MITCHELL EDWARD KARAM, Defendant herein, had a telephone conversation with GHAZI MANNI, Defendant herein.

6. On or about Sunday, November 20, 2005, at approximately 12:12 p.m., HARVEY LAMONT McDOUGLE JR., Defendant herein, had a telephone conversation with GHAZI MANNI, Defendant herein.

7. On or about Sunday, November 20, 2005, at approximately 12:47 p.m., GHAZI MANNI, Defendant herein, had a telephone conversation with MITCHELL EDWARD KARAM, Defendant herein.

8. On or about Sunday, November 20, 2005, at approximately 1:02 p.m., ADAM RYAN CUOMO, Defendant herein, had a telephone conversation with GHAZI MANNI, Defendant herein.

9. On or about Sunday, November 20, 2005, at approximately 1:36 p.m., GHAZI MANNI, Defendant herein, had a telephone conversation with MITCHELL EDWARD KARAM, Defendant herein.

10. On or about Sunday, November 20, 2005, at approximately 3:11 p.m., ADAM RYAN CUOMO, Defendant herein, had a telephone conversation with GHAZI MANNI, Defendant herein.

11. On or about Sunday, November 20, 2005, at approximately 4:01 p.m., GHAZI MANNI, Defendant herein, had a telephone conversation with MITCHELL EDWARD KARAM, Defendant herein.

12. On or about Sunday, November 20, 2005, at approximately 5:42 p.m., HARVEY LAMONT McDOUGLE JR., Defendant herein, had a telephone conversation with GHAZI MANNI, Defendant herein.

13. On or about Sunday, November 20, 2005, at approximately 9:46 p.m., GHAZI MANNI, Defendant herein, had a telephone conversation with Samuel Aviles Villegas.

14. On or about Monday, November 21, 2005, at approximately 4:54 p.m., GHAZI MANNI, Defendant herein, had a telephone conversation with Samuel Aviles Villegas.

15. On or about Monday, November 21, 2005, at approximately 5:37 p.m., HARVEY LAMONT McDOUGLE JR., Defendant herein, had a telephone conversation with GHAZI MANNI, Defendant herein.

16. On or about Friday, November 25, 2005, at approximately 9:32 a.m., MITCHELL EDWARD KARAM, Defendant herein, had a telephone conversation with GHAZI MANNI, Defendant herein.

17. On or about Friday, November 25, 2005, at approximately 10:24 a.m., GHAZI MANNI, Defendant herein, had a telephone conversation with Samuel Aviles Villegas.

18. On or about Friday, November 25, 2005, at approximately 7:02 p.m., GHAZI MANNI, Defendant herein, had a telephone conversation with Samuel Aviles Villegas.

19. On or about Saturday, November 26, 2005, at approximately 6:55 p.m., GHAZI MANNI, Defendant herein, had a telephone conversation with Samuel Aviles Villegas.

20. On or about Sunday, November 27, 2005, at approximately 12:26 a.m., GHAZI MANNI, Defendant herein, had a telephone conversation with Samuel Aviles Villegas.

21. On or about Sunday, November 27, 2005, at approximately 11:33 a.m., GHAZI MANNI, Defendant herein, had a telephone conversation with Samuel Aviles Villegas.

22. On or about Sunday, November 27, 2005, at approximately 11:43 a.m., GHAZI MANNI, Defendant herein, had a telephone conversation with MITCHELL EDWARD KARAM, Defendant herein.

23. On or about Sunday, November 27, 2005, at approximately 2:24 p.m., GHAZI MANNI, Defendant herein, had a telephone conversation with MITCHELL EDWARD KARAM, Defendant herein.

24. On or about Sunday, November 27, 2005, at approximately 2:46 p.m., GHAZI MANNI, Defendant herein, had a telephone conversation with MITCHELL EDWARD KARAM, Defendant herein.

25. On or about Monday, November 28, 2005, at approximately 4:18 p.m., GHAZI MANNI, Defendant herein, had a telephone conversation with Samuel Aviles Villegas.

26. On or about Wednesday, November 30, 2005, at approximately 9:31 p.m., GHAZI MANNI, Defendant herein, met HARVEY LAMONT McDOUGLE JR. and QUINTON JAMES BROUSSARD, Defendants herein, in a parking lot located on Stadium Boulevard near the University of Toledo football stadium in Toledo, Ohio.

27. On or about Wednesday, November 30, 2005, at approximately 9:59 p.m., GHAZI MANNI, Defendant herein, had a telephone conversation with Samuel Aviles Villegas.

28. On or about Wednesday, November 30, 2005, at approximately 9:59 p.m., GHAZI MANNI, Defendant herein, met Samuel Aviles Villegas in a parking lot located on Stadium Boulevard near the University of Toledo football stadium in Toledo, Ohio.

29. On or about Wednesday, November 30, 2005, at approximately 10:12 p.m., HARVEY LAMONT McDOUGLE JR., Defendant herein, had a telephone conversation with GHAZI MANNI, Defendant herein.

30. On or about Thursday, December 1, 2005, at approximately 5:46 p.m., ADAM RYAN CUOMO, Defendant herein, had a telephone conversation with GHAZI MANNI, Defendant herein.

31. On or about Friday, December 2, 2005, at approximately 9:10 p.m., GHAZI MANNI, Defendant herein, met MITCHELL EDWARD KARAM, ADAM RYAN CUOMO, HARVEY

McDOUGLE JR., and QUINTON JAMES BROUSSARD, Defendants herein, at the Laikon Cafe in Detroit, Michigan.

32. On or about Friday, December 2, 2005, at approximately 10:05 p.m., GHAZI MANNI, MITCHELL EDWARD KARAM, ADAM RYAN CUOMO, HARVEY McDOUGLE JR., and QUINTON BROUSSARD, Defendants herein, met at the Greektown Casino located at 555 East Lafayette Street in Detroit, Michigan.

33. On or about Saturday, December 3, 2005, at approximately 2:52 p.m., ADAM RYAN CUOMO, Defendant herein, had a telephone conversation with GHAZI MANNI, Defendant herein.

34. On or about Saturday, December 3, 2005, at approximately 3:46 p.m., GHAZI MANNI, Defendant herein, had a telephone conversation with Samuel Aviles Villegas.

35. On or about Saturday, December 3, 2005, at approximately 3:54 p.m., ADAM RYAN CUOMO, Defendant herein, had a telephone conversation with GHAZI MANNI, Defendant herein.

36. On or about Saturday, December 3, 2005, at approximately 4:12 p.m., GHAZI MANNI, Defendant herein, had a telephone conversation with MITCHELL EDWARD KARAM, Defendant herein.

37. On or about Saturday, December 3, 2005, at approximately 7:42 p.m., ADAM RYAN CUOMO, Defendant herein, had a telephone conversation with GHAZI MANNI, Defendant herein.

38. On or about Saturday, December 3, 2005, at approximately 8:03 p.m., ADAM RYAN CUOMO, Defendant herein, had a telephone conversation with GHAZI MANNI,

Defendant herein.

39. On or about Sunday, December 4, 2005, at approximately 12:21 p.m., ADAM RYAN CUOMO, Defendant herein, had a telephone conversation with GHAZI MANNI, Defendant herein.

40. On or about Tuesday, December 6, 2005, at approximately 7:28 p.m., GHAZI MANNI, Defendant herein, had a telephone conversation with Samuel Aviles Villegas.

41. On or about Wednesday, December 7, 2005, at approximately 9:39 p.m., GHAZI MANNI, Defendant herein, had a telephone conversation with Samuel Aviles Villegas.

42. On or about Sunday, December 11, 2005, at approximately 11:42 a.m., GHAZI MANNI, Defendant herein, had a telephone conversation with Samuel Aviles Villegas.

43. On or about Monday, December 12, 2005, at approximately 11:19 p.m., ADAM RYAN CUOMO, Defendant herein, had a telephone conversation with GHAZI MANNI, Defendant herein.

44. On or about Monday, December 12, 2005, GHAZI MANNI, Defendant herein, met Samuel Aviles Villegas in Hamtramck, Michigan.

45. On or about Wednesday, December 14, 2005, at approximately 6:33 p.m., QUINTON JAMES BROUSSARD, Defendant herein, had a telephone conversation with GHAZI MANNI, Defendant herein.

46. On or about Friday, December 16, 2005, at approximately 4:15 p.m., GHAZI MANNI, Defendant herein, met ANTON DU'ANE CURRIE, Defendant herein, and Samuel Aviles Villegas at the Laikon Cafe located at 569 Monroe Street in Detroit, Michigan.

47. On or about Saturday, December 17, 2005, at approximately 10:48 a.m., ADAM

RYAN CUOMO, Defendant herein, had a telephone conversation with GHAZI MANNI, Defendant herein.

48. On or about Saturday, December 17, 2005, at approximately 1:07 p.m., ADAM RYAN CUOMO, Defendant herein, had a telephone conversation with GHAZI MANNI, Defendant herein.

49. On or about Saturday, December 17, 2005, at approximately 5:17 p.m., MITCHELL EDWARD KARAM, Defendant herein, had a telephone conversation with GHAZI MANNI, Defendant herein.

50. On or about Saturday, December 17, 2005, at approximately 6:16 p.m., GHAZI MANNI, Defendant herein, had a telephone conversation with MITCHELL EDWARD KARAM, Defendant herein.

51. On or about Saturday, December 17, 2005, at approximately 7:19 p.m., MITCHELL EDWARD KARAM, Defendant herein, had a telephone conversation with GHAZI MANNI, Defendant herein.

52. On or about Sunday, December 18, 2005, at approximately 12:13 p.m., ADAM RYAN CUOMO, Defendant herein, had a telephone conversation with GHAZI MANNI, Defendant herein.

53. On or about Sunday, December 18, 2005, at approximately 5:01 p.m., GHAZI MANNI, Defendant herein, had a telephone conversation with Samuel Aviles Villegas.

54. On or about Wednesday, December 21, 2005, at approximately 11:03a.m., ADAM RYAN CUOMO, Defendant herein, had a telephone conversation with GHAZI MANNI, Defendant herein.

55. On or about Wednesday, December 21, 2005, at approximately 1:36 p.m., MITCHELL EDWARD KARAM, Defendant herein, had a telephone conversation with GHAZI MANNI, Defendant herein.

56. On or about Wednesday, December 21, 2005, at approximately 3:13 p.m., GHAZI MANNI, Defendant herein, had a telephone conversation with Samuel Aviles Villegas.

57. On or about Wednesday, December 21, 2005, at approximately 3:49 p.m., GHAZI MANNI, Defendant herein, had a telephone conversation with Samuel Aviles Villegas.

58. On or about Wednesday, December 21, 2005, at approximately 3:58 p.m., ADAM RYAN CUOMO, Defendant herein, had a telephone conversation with GHAZI MANNI, Defendant herein.

59. On or about Wednesday, December 21, 2005, at approximately 6:36 p.m., MITCHELL EDWARD KARAM, Defendant herein, had a telephone conversation with GHAZI MANNI, Defendant herein.

60. On or about Wednesday, December 21, 2005, at approximately 8:52 p.m., Samuel Villegas had a telephone conversation with GHAZI MANNI, Defendant herein.

61. On or about Wednesday, December 21, 2005, at approximately 9:22 p.m., ANTON DU'ANE CURRIE, Defendant herein, had a telephone conversation with GHAZI MANNI, Defendant herein.

62. On or about Wednesday, December 21, 2005, at approximately 10:09 p.m., ANTON DU'ANE CURRIE, Defendant herein, had a telephone conversation with GHAZI MANNI, Defendant herein.

63. On or about Wednesday, December 21, 2005, at approximately 10:21 p.m., ANTON



DU'ANE CURRIE, Defendant herein, had a telephone conversation with GHAZI MANNI, Defendant herein.

64. On or about Wednesday, December 21, 2005, at approximately 10:34 p.m., GHAZI MANNI, Defendant herein, met ANTON DU'ANE CURRIE, Defendant herein, in the parking lot of the Ramada Inn located at 25800 Dequindre Avenue, Warren, Michigan.

65. On or about Wednesday, December 21, 2005, at approximately 11:11 p.m., GHAZI MANNI, Defendant herein, had a telephone conversation with ANTON DU'ANE CURRIE, Defendant herein.

66. On or about Thursday, December 22, 2005, at approximately 9:39 a.m., GHAZI MANNI, Defendant herein, met Samuel Aviles Villegas at the Huntington Bank located at 9301 Joseph Campau in Hamtramck, Michigan.

67. On or about Thursday, December 22, 2005, at approximately 5:32 p.m., GHAZI MANNI, Defendant herein, met ADAM RYAN CUOMO, Defendant herein, in the parking lot of Bob Evans Restaurant located at 25700 Dequindre in Warren, Michigan.

68. On or about Wednesday, December 28, 2005, at approximately 12:24 p.m., MITCHELL EDWARD KARAM, Defendant herein, had a telephone conversation with GHAZI MANNI, Defendant herein.

69. On or about Tuesday, January 3, 2006, at approximately 10:03 p.m., GHAZI MANNI, Defendant herein, had a telephone conversation with ANTON DU'ANE CURRIE, Defendant herein, and Samuel Aviles Villegas.

70. On or about Tuesday, January 3, 2006, at approximately 11:31 a.m., ADAM RYAN CUOMO, Defendant herein, had a telephone conversation with GHAZI MANNI, Defendant

herein.

71. On or about Saturday, January 7, 2006, at approximately 4:57 p.m., GHAZI MANNI, Defendant herein, had a telephone conversation with Samuel Aviles Villegas.

72. On or about Saturday, January 7, 2006, at approximately 5:01 p.m., MITCHELL EDWARD KARAM, Defendant herein, had a telephone conversation with GHAZI MANNI, Defendant herein.

73. On or about Saturday, January 7, 2006, at approximately 5:15 p.m., GHAZI MANNI, Defendant herein, had a telephone conversation with ANTON DU'ANE CURRIE, Defendant herein.

74. On or about Saturday, January 7, 2006, at approximately 5:41 p.m., MITCHELL EDWARD KARAM, Defendant herein, had a telephone conversation with GHAZI MANNI, Defendant herein.

75. On or about Saturday, January 7, 2006 at approximately 6:26 p.m., MITCHELL EDWARD KARAM, Defendant herein, had a telephone conversation with GHAZI MANNI, Defendant herein.

76. On or about Monday, January 9, 2006, at approximately 10:58 a.m., GHAZI MANNI, Defendant herein, had a telephone conversation with Samuel Aviles Villegas.

77. On or about Wednesday, January 11, 2006, at approximately 3:28 p.m., GHAZI MANNI, Defendant herein, met Samuel Aviles Villegas at the Huntington Bank located at 9301 Joseph Campau in Hamtramck, Michigan.

78. On or about Wednesday, January 11, 2006, at approximately 1:35 p.m., QUINTON JAMES BROUSSARD, Defendant herein, had a telephone conversation with GHAZI MANNI,

Defendant herein.

79. On or about Saturday, January 14, 2006, at approximately 9:33 p.m., GHAZI MANNI, Defendant herein, had a telephone conversation with Samuel Aviles Villegas.

80. On or about Sunday, January 15, 2006, at approximately 12:22 p.m., GHAZI MANNI, Defendant herein, had a telephone conversation with MITCHELL EDWARD KARAM, Defendant herein.

81. On or about Sunday, January 15, 2006, at approximately 12:57 p.m., GHAZI MANNI, Defendant herein, had a telephone conversation with MITCHELL EDWARD KARAM, Defendant herein.

82. On or about Tuesday, January 17, 2006, at approximately 9:46 p.m., GHAZI MANNI, Defendant herein, had a telephone conversation with Samuel Aviles Villegas.

83. On or about Wednesday, January 18, 2006, at approximately 2:24 p.m., GHAZI MANNI, Defendant herein, had a telephone conversation with Samuel Aviles Villegas.

84. On or about Wednesday, January 18, 2006, at approximately 2:48 p.m., GHAZI MANNI, Defendant herein, had a telephone conversation with MITCHELL EDWARD KARAM, Defendant herein.

85. On or about Wednesday, January 18, 2006, at approximately 4:30 p.m., MITCHELL EDWARD KARAM, Defendant herein, had a telephone conversation with GHAZI MANNI, Defendant herein.

86. On or about Saturday, January 21, 2006, at approximately 1:48 p.m., GHAZI MANNI, Defendant herein, had a telephone conversation with Samuel Aviles Villegas.

87. On or about Tuesday, January 24, 2006, at approximately 2:29 p.m., MITCHELL

EDWARD KARAM, Defendant herein, had a telephone conversation with GHAZI MANNI, Defendant herein.

88. On or about Tuesday, January 24, 2006, at approximately 4:17 p.m., MITCHELL EDWARD KARAM, Defendant herein, had a telephone conversation with GHAZI MANNI, Defendant herein.

89. On or about Wednesday, January 25, 2006, at approximately 7:45 p.m., GHAZI MANNI, Defendant herein, had a telephone conversation with Samuel Aviles Villegas.

90. On or about Thursday, January 26, 2006, at approximately 11:27 a.m., ADAM RYAN CUOMO, Defendant herein, had a telephone conversation with GHAZI MANNI, Defendant herein.

91. On or about Thursday, January 26, 2006, at approximately 3:57 p.m., GHAZI MANNI, Defendant herein, had a telephone conversation with Samuel Aviles Villegas.

92. On or about Thursday, January 26, 2006, at approximately 4:10 p.m., HARVEY LAMONT McDOUGLE JR., Defendant herein, had a telephone conversation with GHAZI MANNI, Defendant herein.

93. On or about Friday, January 27, 2006, at approximately 3:05 p.m., GHAZI MANNI, Defendant herein, had a telephone conversation with Samuel Aviles Villegas.

94. On or about Sunday, January 29, 2006, at approximately 2:15 p.m., ADAM RYAN CUOMO, Defendant herein, had a telephone conversation with GHAZI MANNI, Defendant herein.

95. On or about Wednesday, February 1, 2006, at approximately 6:15 p.m., MITCHELL EDWARD KARAM, Defendant herein, had a telephone conversation with GHAZI MANNI,

Defendant herein.

96. On or about Wednesday, February 1, 2006, at approximately 6:42 p.m., GHAZI MANNI, Defendant herein, had a telephone conversation with MITCHELL EDWARD KARAM, Defendant herein.

97. On or about Wednesday, February 1, 2006, at approximately 9:00 p.m., ADAM RYAN CUOMO, Defendant herein, had a telephone conversation with GHAZI MANNI, Defendant herein.

98. On or about Thursday, February 2, 2006, at approximately 4:42 p.m., ADAM RYAN CUOMO, Defendant herein, had a telephone conversation with GHAZI MANNI, Defendant herein.

99. On or about Friday, February 3, 2006, at approximately 7:15 p.m., GHAZI MANNI, Defendant herein, had a telephone conversation with Samuel Aviles Villegas.

100. On or about Saturday, February 4, 2006, at approximately 12:15 p.m., Samuel Aviles Villegas had a telephone conversation with GHAZI MANNI, Defendant herein.

101. On or about Saturday, February 4, 2006, at approximately 12:29 p.m., Samuel Aviles Villegas had a telephone conversation with GHAZI MANNI, defendant herein.

102. On or about Saturday, February 4, 2006, at approximately 3:57 p.m., GHAZI MANNI, Defendant herein, had a telephone conversation with Samuel Aviles Villegas.

103. On or about Saturday, February 4, 2006, at approximately 4:12 p.m., GHAZI MANNI, Defendant herein, had a telephone conversation with MITCHELL EDWARD KARAM, Defendant herein.

104. On or about Saturday, February 4, 2006, at approximately 4:22 p.m., GHAZI

MANNI, Defendant herein, had a telephone conversation with MITCHELL EDWARD KARAM, Defendant herein.

105. On or about Saturday, February 4, 2006, at approximately 4:27 p.m., MITCHELL EDWARD KARAM, Defendant herein, had a telephone conversation with GHAZI MANNI, Defendant herein.

106. On or about Saturday, February 4, 2006, at approximately 9:46 p.m., Samuel Aviles Villegas had a telephone conversation with GHAZI MANNI, Defendant herein.

107. On or about Saturday, February 4, 2006, at approximately 9:50 p.m., Samuel Aviles Villegas had a telephone conversation with GHAZI MANNI, Defendant herein.

108. On or about Tuesday, Tuesday, February 7, 2006, at approximately 5:20 p.m., GHAZI MANNI, Defendant herein, had a telephone conversation with MITCHELL EDWARD KARAM, Defendant herein.

109. On or about Tuesday, February 7, 2006, at approximately 5:38 p.m., KASHIF LASHON PAYNE, Defendant herein, had a telephone conversation with GHAZI MANNI, Defendant herein.

110. On or about Wednesday, February 8, 2006, at approximately 2:50 p.m., HARVEY LAMONT McDOUGLE JR., Defendant herein, had a telephone conversation with GHAZI MANNI, Defendant herein.

111. On or about Friday, February 17, 2006, at approximately 6:08 p.m., HARVEY LAMONT McDOUGLE JR., Defendant herein, had a telephone conversation with GHAZI MANNI, Defendant herein.

112. On or about Saturday, February 18, 2006, at approximately 12:13 p.m., Samuel

Aviles Villegas had a telephone conversation with GHAZI MANNI, Defendant herein.

113. On or about Saturday, February 18, 2006, at approximately 12:43 p.m., Samuel Aviles Villegas and KASHIF LASHON PAYNE, Defendant herein, had a telephone conversation with GHAZI MANNI, Defendant herein.

114. On or about Saturday, February 18, 2006, at approximately 12:50 p.m., GHAZI MANNI, Defendant herein, had a telephone conversation with MITCHELL EDWARD KARAM, Defendant herein.

115. On or about Tuesday, March 21, 2006, at approximately 12:54 p.m., HARVEY LAMONT McDOUGLE JR., Defendant herein, had a telephone conversation with GHAZI MANNI, Defendant herein.

116. On or about Thursday, March 23, 2006, at approximately 4:02 p.m., MITCHELL EDWARD KARAM, Defendant herein, had a telephone conversation with GHAZI MANNI, Defendant herein.

117. On or about Thursday, April 6, 2006, at approximately 1:04 p.m., Samuel Aviles Villegas had a telephone conversation with GHAZI MANNI, Defendant herein.

118. On or about Thursday, April 13, 2006, at approximately 3:30 p.m., Samuel Aviles Villegas and KASHIF LASHON PAYNE, Defendant herein, had a telephone conversation with GHAZI MANNI, Defendant herein.

119. On or about Thursday, August 17, 2006, at approximately 2:35 p.m., HARVEY LAMONT McDOUGLE JR., Defendant herein, had a telephone conversation with GHAZI MANNI, Defendant herein.

120. On or about Saturday, August 19, 2006, at approximately 8:37 p.m., QUINTON

JAMES BROUSSARD, Defendant herein, had a telephone conversation with GHAZI MANNI, Defendant herein.

121. On or about Tuesday, August 21, 2006, at approximately 6:19 p.m., HARVEY LAMONT McDOUGLE JR., Defendant herein, had a telephone conversation with GHAZI MANNI, Defendant herein.

122. On or about Tuesday, August 21, 2006, at approximately 7:26 p.m., MITCHELL EDWARD KARAM, Defendant herein, had a telephone conversation with GHAZI MANNI, Defendant herein.

123. On or about Thursday, August 24, 2006, GHAZI MANNI, Defendant herein, met with MITCHELL KARAM, Defendant herein, at the Sahara Restaurant located at 23133 Coolidge Highway, Oak Park, Michigan.

124. On or about Thursday, August 24, 2006, at approximately 9:31 p.m., QUINTON JAMES BROUSSARD, Defendant herein, had a telephone conversation with GHAZI MANNI, Defendant herein.

125. On or about Monday, August 28, 2006, at approximately 4:30 p.m., GHAZI MANNI, Defendant herein, met HARVEY LAMONT McDOUGLE JR., Defendant herein, in the parking lot of King Cole Foods located at 40 Clairmount Avenue in Detroit, Michigan.

126. On or about Tuesday, August 29, 2006, at approximately 3:10 p.m., QUINTON JAMES BROUSSARD, Defendant herein, had a telephone conversation with GHAZI MANNI, Defendant herein.

127. On or about Tuesday, September 5, 2006, at approximately 9:31 p.m., HARVEY LAMONT McDOUGLE JR., Defendant herein, had a telephone conversation with GHAZI



MANNI, Defendant herein.

128. On or about Saturday, September 9, 2006, at approximately 8:40 p.m., ADAM RYAN CUOMO, Defendant herein, had a telephone conversation with GHAZI MANNI, Defendant herein.

129. On or about Monday, November 20, 2006, at approximately 1:48 p.m., KASHIF LASHON PAYNE, Defendant herein, had a telephone conversation with GHAZI MANNI, Defendant herein.

130. On or about Monday, November 20, 2006, at approximately 2:30 p.m., KASHIF LASHON PAYNE, Defendant herein, had a telephone conversation with GHAZI MANNI, Defendant herein.

131. On or about Tuesday, November 21, 2006, at approximately 11:08 a.m., ADAM RYAN CUOMO, Defendant herein, had a telephone conversation with GHAZI MANNI, Defendant herein.

132. On or about Wednesday, November 29, 2006, at approximately 5:12 p.m., KASHIF LASHON PAYNE, Defendant herein, had a telephone conversation with GHAZI MANNI, Defendant herein.

133. On or about Wednesday, November 29, 2006, at approximately 5:16 p.m., KASHIF LASHON PAYNE, Defendant herein, had a telephone conversation with GHAZI MANNI, Defendant herein.

134. On or about Friday, December 1, 2006 at approximately 10:23 p.m., KASHIF LASHON PAYNE, Defendant herein, had a telephone conversation with GHAZI MANNI, Defendant herein.

135. On or about Saturday, December 2, 2006, at approximately 6:06 p.m., KASHIF LASHON PAYNE, Defendant herein, had a telephone conversation with GHAZI MANNI, Defendant herein.

136. On or about Saturday, December 2, 2006, at approximately 6:27 p.m., GHAZI MANNI, Defendant herein, had a telephone conversation with KASHIF LASHON PAYNE, Defendant herein.

137. On or about Sunday, December 3, 2006, at approximately 6:37 p.m., HARVEY LAMONT McDOUGLE JR., Defendant herein, had a telephone conversation with GHAZI MANNI, Defendant herein.

138. On or about Monday, December 4, 2006, at approximately 8:45 p.m., HARVEY LAMONT McDOUGLE JR., Defendant herein, had a telephone conversation with GHAZI MANNI, Defendant herein.

139. On or about Monday, December 4, 2006, at approximately 10:43 p.m., KASHIF LASHON PAYNE, Defendant herein, had a telephone conversation with GHAZI MANNI, Defendant herein.

140. On or about Tuesday, December 5, 2006, at approximately 5:24 p.m., KASHIF LASHON PAYNE, Defendant herein, had a telephone conversation with GHAZI MANNI, Defendant herein.

141. On or about Friday, December 15, 2006, at approximately 9:26 p.m., KASHIF LASHON PAYNE, Defendant herein, had a telephone conversation with GHAZI MANNI, Defendant herein.

142. On or about Tuesday, December 19, 2006, at approximately 5:17 p.m., KASHIF

LASHON PAYNE, Defendant herein, had a telephone conversation with GHAZI MANNI, Defendant herein.

143. On or about Tuesday, December 19, 2006, at approximately 10:13 p.m., KASHIF LASHON PAYNE, Defendant herein, had a telephone conversation with GHAZI MANNI, Defendant herein.

All in violation of Title 18, United States Code, Section 224(a).

**COUNTS TWO THROUGH TWENTY.**

**(18 U.S.C. § 1952 - Unlawful Use of a Facility in Interstate Commerce)**

- D-1 GHAZI MANNI
- D-3 ADAM RYAN CUOMO
- D-5 ANTON DU'ANE CURRIE
- D-6 KASHIF LASHON PAYNE
- D-7 HARVEY LAMONT McDOUGLE JR.
- D-8 QUINTON JAMES BROUSSARD

On the dates listed below, in the Eastern District of Michigan and elsewhere, the Defendants listed below, and others known and unknown to the Grand Jury, did knowingly use and cause to be used a facility in interstate commerce with intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment and carrying on of unlawful activity, as that term is defined in Title 18, United States Code, Section 1952(b), to wit: bribery in violation of Title 18, United States Code, section 224; Michigan Compiled Laws Sections 750.157a(a) and 750.124, and Ohio Revised Code Section 2915.05, and thereafter did perform and attempt to perform acts to promote, manage, establish, and carry on, and to facilitate the promotion, management, establishment, and carrying on of said unlawful activity:

COUNT	DEFENDANTS	DATE AND APPROXIMATE TIME OF USE OF INTERSTATE FACILITY TO AND FROM THE EASTERN DISTRICT OF MICHIGAN
TWO	GHAZI MANNI ADAM RYAN CUOMO	DECEMBER 17, 2005 10:48 A.M.
THREE	GHAZI MANNI ADAM RYAN CUOMO	DECEMBER 17, 2005 1:07 P.M.
FOUR	GHAZI MANNI ADAM RYAN CUOMO	DECEMBER 21, 2005 11:03 A.M.
FIVE	GHAZI MANNI ADAM RYAN CUOMO	DECEMBER 21, 2005 3:58 P.M.
SIX	GHAZI MANNI ADAM RYAN CUOMO	JANUARY 3, 2006 11:31 A.M.
SEVEN	GHAZI MANNI ADAM RYAN CUOMO	JANUARY 26, 2006 11:27 A.M.
EIGHT	GHAZI MANNI ANTON DU'ANE CURRIE	DECEMBER 21, 2005 9:22 P.M.
NINE	GHAZI MANNI ANTON DU'ANE CURRIE	JANUARY 7, 2006 5:15 P.M.
TEN	GHAZI MANNI KASHIF LASHON PAYNE	FEBRUARY 7, 2006 5:38 P.M.
ELEVEN	GHAZI MANNI KASHIF LASHON PAYNE	NOVEMBER 20, 2006 1:48 P.M.
TWELVE	GHAZI MANNI KASHIF LASHON PAYNE	NOVEMBER 20, 2006 2:30 P.M.
THIRTEEN	GHAZI MANNI KASHIF LASHON PAYNE	DECEMBER 1, 2006 10:23 P.M.
FOURTEEN	GHAZI MANNI KASHIF LASHON PAYNE	DECEMBER 19, 2006 5:17 P.M.
FIFTEEN	GHAZI MANNI HARVEY LAMONT McDOUGLE JR.	NOVEMBER 28, 2005 1:52 P.M.

SIXTEEN	GHAZI MANNI HARVEY LAMONT McDOUGLE JR.	NOVEMBER 30, 2005 10:12 A.M.
SEVENTEEN	GHAZI MANNI HARVEY LAMONT McDOUGLE JR.	SEPTEMBER 5, 2006 9:31 P.M.
EIGHTEEN	GHAZI MANNI HARVEY LAMONT McDOUGLE JR.	DECEMBER 3, 2006 6:37 P.M.
NINETEEN	GHAZI MANNI HARVEY LAMONT McDOUGLE JR.	DECEMBER 4, 2006 8:45 P.M.
TWENTY	GHAZI MANNI QUINTON JAMES BROUSSARD	JANUARY 11, 2006 1:35 P.M.

All in violation of Title 18, United States Code, Section 1952(a)(3)(A).

THIS IS A TRUE BILL.

s/Grand Jury Foreperson  
GRAND JURY FOREPERSON

TERRENCE BERG  
United States Attorney

s/Lynn A. Helland  
LYNN A. HELLAND  
Assistant Chief, Criminal Division

s/David E. Morris  
DAVID E. MORRIS  
Assistant U.S. Attorney

s/Saima S. Mohsin  
SAIMA S. MOHSIN  
Assistant U.S. Attorney  
U.S. Department of Justice  
211 West Fort Street, Suite 2001  
Detroit, Michigan 48226-3211  
Telephone: 313-226-9646

DATED: May 6, 2009.

United States District Court  
Eastern District of Michigan

**Criminal Case Cover Sheet**

Case Number

NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it accurately in all respects.

<b>Companion Case Information</b>	<b>Companion Case Number:</b> 1. U.S. v. Samuel Aviles Villegas 08-20353 - Hon. Julian Abele Cook  2. U.S. v. Ghazi Manni, et al (Separate action from the instant case, filed May 6, 2009, case number and Judge unknown)
	This may be a companion case based upon LCrR 57.10 (b)(4) <sup>1</sup> :  <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
AUSA's Initials: <i>JEM</i>	

Case Title: USA v. GAZI MANNI, et al

Case: 2:09-cr-20192  
Judge: Roberts, Victoria A  
MJ: Komives, Paul J  
Filed: 05-06-2009 At 12:13 PM  
IND USA VS MANNI ET AL (LH)

County where offense occurred : Wayne

Check One:       Felony       Misdemeanor       Petty

\_\_\_\_\_ Indictment — no prior complaint.  
 Indictment --- based upon prior complaint:  
                  08-30355      D-3 ADAM RYAN CUOMO  
                  07-30182      D-7 HARVEY LAMONT McDOUGLE, JR.  
\_\_\_\_\_ 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.

May 6, 2009  
Date

*David E. Morris*  
DAVID E. MORRIS (P61451)  
Assistant United States Attorney  
211 W. Fort, Suite 2001  
Detroit, MI 48226  
Telephone: (313) 226-9646  
Email: [Dave.Morris@usdoj.gov](mailto:Dave.Morris@usdoj.gov)

<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. 5/20/04