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UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA
June 2008 Grand Jury

UNITED STATES OF AMERICA,) CR 09-_____
)
Plaintiff,) I N D I C T M E N T
)
v.) [18 U.S.C. § 371: Conspiracy;
) 2 U.S.C. §§ 441f, 437g(d):
ALA'A AL-ALI,) Illegal Campaign Contributions;
aka Ala'a Mohy Eddin) 2 U.S.C. §§ 441e, 437g(d):
Elali,) Campaign Contributions by
aka Alaa Al-Ali,) Foreign Nationals; 18 U.S.C.
) § 2: Aiding and Abetting and
Defendant.) Causing an Act To Be Done]
)

The Grand Jury charges:

GENERAL ALLEGATIONS

At all times relevant to this Indictment:

A. Federal Election Laws

1. The Federal Election Campaign Act ("FECA") governed candidates for Federal office and the political committees that received contributions on their behalf.

2. FECA defined "Federal office" as the office of President or Vice President of the United States or Senator or Representative in the United States Congress.

SYM:sym

1 3. FECA defined "political committee" as a committee, club,
2 association or other group of persons that receives contributions
3 aggregating in excess of \$1,000 during a calendar year or that
4 makes expenditures aggregating in excess of \$1,000 during a
5 calendar year.

6 4. FECA defined "election" to include a general, special,
7 primary, or runoff election and a convention or caucus of a
8 political party with authority to nominate a candidate.

9 5. FECA defined an "authorized political committee" as the
10 principal campaign committee or any other political committee
11 authorized, in writing, by a candidate for a Federal office to
12 receive contributions or make expenditures on behalf of such
13 candidate.

14 6. FECA defined "principal campaign committee" as a
15 political committee designated and authorized by a candidate for
16 Federal office. FECA required that a candidate for Federal
17 office designate a principal campaign committee.

18 7. Under FECA, a candidate for Federal office who received
19 contributions or made disbursements for his or her campaign was
20 deemed an agent of the candidate's authorized political
21 committee(s).

22 8. FECA required each political committee to have a
23 treasurer who was required to file periodic reports with the
24 Federal Election Commission identifying, among other things,
25 persons whose contributions aggregated in excess of \$200 within
26 the calendar year (or per election cycle in the case of
27 authorized committees of a candidate for Federal office) by name,
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1 address, and occupation and the contributions provided by those
2 contributors by date and amount.

3 9. FECA defined a "contribution" as, among other things,
4 any gift, loan, advance, or deposit of money or anything of value
5 made by any person for the purpose of influencing any election
6 for Federal office.

7 10. FECA defined a "foreign national" as any person who is
8 not a citizen of the United States, or a national of the United
9 States who is not lawfully admitted for permanent residence.

10 Defendant ALA'A AL-ALI, also known as Ala'a Mohy Eddin Elali,
11 also known as Alaa Al-Ali ("ALI") was a foreign national, in that
12 he was a citizen of Jordan and the Dominican Republic and not a
13 citizen of the United States.

14 11. FECA prohibited the following:

15 a. An individual from making a contribution, or
16 contributions, that in the aggregate exceeded \$2,300, to any
17 candidate and the candidate's authorized political committees
18 with respect to any election for federal office;

19 b. An individual from making a contribution in the
20 name of another person or knowingly permitting his or her name to
21 be used to effect such a contribution (the person in whose name
22 such a contribution is made is known as a "conduit contributor");
23 and

24 c. A foreign national from making, directly or through
25 any other person, any contributions in connection with a Federal,
26 State, or local election.

1 B. Parties and Entities

2 12. Federal Candidate 1 was a candidate for the office of
3 President of the United States.

4 13. Federal Candidate 2 was a candidate for the office of
5 President of the United States.

6 14. Federal Candidate 3 was a candidate for the office of
7 President of the United States.

8 15. State Candidate 1 was a candidate for the office of
9 Governor of the State of Florida.

10 C. Incorporation By Reference

11 16. These General Allegations are incorporated by reference
12 into each and every count of this Indictment.

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COUNT ONE

[18 U.S.C. § 371, 2 U.S.C. §§ 441e, 441f, 437g(d)]

A. THE OBJECT OF THE CONSPIRACY

17. Beginning in or about April 2006 and continuing to in or about October 2008, in Los Angeles, Orange, San Bernardino, and Riverside Counties, within the Central District of California, defendant ALA'A AL-ALI, also known as Ala'a Mohy Eddin Elali, also known as Alaa Al-Ali ("ALI"), unindicted co-conspirator F.A., and others known and unknown to the Grand Jury, knowingly and willfully conspired and agreed to the following:

a. To violate the FECA by making conduit contributions that aggregated \$25,000 or more within each of the calendar years 2007 and 2008, that is, contributions in the names of others, in violation of 2 U.S.C. §§ 441f and 437g(d); and

b. To violate the FECA by making contributions by a foreign national that aggregated \$25,000 or more within each of the calendar years 2007 AND 2008, in violation of 2 U.S.C. §§ 441e and 437g(d).

B. MEANS BY WHICH THE OBJECTS OF THE CONSPIRACY WERE TO BE ACCOMPLISHED

18. Defendant ALI would solicit individuals to make contributions to the principal campaign committees of Federal Candidate 1, Federal Candidate 2, Federal Candidate 3, and State Candidate 1 and would inform such individuals that he would reimburse their contributions.

19. Defendant ALI would instruct unindicted co-conspirator F.A. to solicit other individuals to make

1 contributions to the principal campaign committees of Federal
2 Candidate 1, Federal Candidate 2, Federal Candidate 3, and State
3 Candidate 1 that defendant ALI would reimburse.

4 20. Defendant ALI would inform those individuals and cause
5 them to be informed that they would be reimbursed for their
6 contributions to the principal campaign committees of Federal
7 Candidate 1, Federal Candidate 2, Federal Candidate 3, and State
8 Candidate 1.

9 21. Defendant ALI would collect and receive contributions
10 to the principal campaign committees of Federal Candidate 1,
11 Federal Candidate 2, Federal Candidate 3, and State Candidate 1
12 from the individuals referenced in paragraphs 18, 19, and 20,
13 above (hereafter the "conduit contributors") and would cause
14 their contributions to be sent to and received by the principal
15 campaign committees of Federal Candidate 1, Federal Candidate 2,
16 Federal Candidate 3, and State Candidate 1.

17 22. Defendant ALI would write out and sign bank checks
18 drawn on the bank account of defendant ALI reimbursing some of
19 the conduit contributors for their contributions to the principal
20 campaign committees of Federal Candidate 1, Federal Candidate 2,
21 Federal Candidate 3, and State Candidate 1.

22 23. Defendant ALI would give cash to some of the conduit
23 contributors to reimburse them for their contributions to the
24 principal campaign committees of Federal Candidate 1, Federal
25 Candidate 2, Federal Candidate 3, and State Candidate 1.

26 24. Defendant ALI would give or cause others to give the
27 contribution checks to H.S., D.S. and M.M. for delivery to the
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1 principal campaign committees of Federal Candidate 1, Federal
2 Candidate 2, Federal Candidate 3, and State Candidate 1.

3 25. As a result of this conspiracy, defendant ALI caused at
4 least \$60,000 in illegal contributions to be made to the
5 principal campaign committees of Federal Candidate 1, Federal
6 Candidate 2, and Federal Candidate 3 and approximately \$5,000 in
7 illegal contributions to be made to the principal campaign
8 committee of State Candidate 1.

9 C. OVERT ACTS

10 26. In furtherance of the conspiracy and to accomplish the
11 objects of the conspiracy, defendant ALI, unindicted co-
12 conspirator F.A., and others known and unknown to the Grand Jury,
13 committed and caused to be committed various overt acts in Los
14 Angeles, Orange, San Bernardino, and Riverside Counties, within
15 the Central District of California, and elsewhere, including, but
16 not limited to, the following:

17 **Conduit Contributors F.A. and S.A.**

18 **Overt Act No. 1**

19 On or about April 3, 2006, defendant ALI solicited
20 unindicted co-conspirator F.A. to make contributions from both
21 unindicted co-conspirator F.A. and his wife, conduit contributor
22 S.A., to the principal campaign committee of State Candidate 1.

23 **Overt Act No. 2**

24 On or about April 3, 2006, defendant ALI caused unindicted
25 co-conspirator F.A. and his wife, conduit contributor S.A., to
26 each make a \$500 contribution to the principal campaign committee
27 of State Candidate 1.

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1 **Overt Act No. 3**

2 On or about April 3, 2006, defendant ALI wrote out a bank
3 check bearing no number in the amount of \$1,000 drawn on
4 defendant ALI's bank account in order to reimburse unindicted co-
5 conspirator F.A. and his wife, conduit contributor S.A., for
6 conduit contributions to the principal campaign committee of
7 State Candidate 1.

8 **Overt Act No. 4**

9 On or about December 9, 2007, defendant ALI solicited
10 unindicted co-conspirator F.A. to make contributions from both
11 unindicted co-conspirator F.A. and his wife, conduit contributor
12 S.A., to the principal campaign committee of Federal Candidate 1.

13 **Overt Act No. 5**

14 On or about December 9, 2007, defendant ALI solicited
15 unindicted co-conspirator F.A. to make contributions from both
16 unindicted co-conspirator F.A. and his wife, conduit contributor
17 S.A., to the principal campaign committee of Federal Candidate 2.

18 **Overt Act No. 6**

19 On or about December 9, 2007, defendant ALI caused
20 unindicted co-conspirator F.A. and his wife, conduit contributor
21 S.A., to each make a \$2,300 contribution to the principal
22 campaign committee of Federal Candidate 1.

23 **Overt Act No. 7**

24 On or about December 9, 2007, defendant ALI caused
25 unindicted co-conspirator F.A. and his wife, conduit contributor
26 S.A., to each make a \$2,300 contribution to the principal
27 campaign committee of Federal Candidate 2.

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1 **Overt Act No. 8**

2 On or about December 9, 2007, defendant ALI wrote out a bank
3 check bearing number 1022 in the amount of \$7,000 drawn on
4 defendant ALI's bank account in order to reimburse unindicted co-
5 conspirator F.A. and his wife, conduit contributor S.A., for
6 conduit contributions to the principal campaign committees of
7 Federal Candidate 1 and Federal Candidate 2.

8 **Overt Act No. 9**

9 On or about December 21, 2007, defendant ALI wrote out a
10 bank check bearing number 1031 in the amount of \$1,600 drawn on
11 defendant ALI's bank account in order to reimburse unindicted co-
12 conspirator F.A. and his wife, conduit contributor S.A., for
13 conduit contributions to the principal campaign committees of
14 Federal Candidate 1 and Federal Candidate 2.

15 **Overt Act No. 10**

16 On or about March 1, 2008, defendant ALI solicited
17 unindicted co-conspirator F.A. to make contributions from both
18 unindicted co-conspirator F.A. and his wife, conduit contributor
19 S.A., to the principal campaign committee of Federal Candidate 3.

20 **Overt Act No. 11**

21 On or about March 1, 2008, defendant ALI caused conduit
22 contributor S.A. to write one check totaling \$9,200, which
23 accounted for two \$4,600 contributions, to the principal campaign
24 committee of Federal Candidate 3.

25 **Overt Act No. 12**

26 On or about March 1, 2008, defendant ALI gave to unindicted
27 co-conspirator F.A. cash in the amount of \$9,200 in order to
28 reimburse unindicted co-conspirator F.A. and his wife, conduit

1 contributor S.A., for conduit contributions to the principal
2 campaign committee of Federal Candidate 3.

3 **Conduit Contributor W.N.**

4 **Overt Act No. 13**

5 On or about June 2, 2006, defendant ALI solicited conduit
6 contributor W.N. to make a contribution to the principal campaign
7 committee of State Candidate 1.

8 **Overt Act No. 14**

9 In or about June 2006, defendant ALI caused conduit
10 contributor W.N. to make two \$500 contributions to the principal
11 campaign committee of State Candidate 1.

12 **Overt Act No. 15**

13 In or about June 2006, defendant ALI gave to conduit
14 contributor W.N. cash in the amount of \$1,000 in order to
15 reimburse conduit contributor W.N. for conduit contributions to
16 the principal campaign committee of State Candidate 1.

17 **Conduit Contributor N.I.A. and S.M.A.**

18 **Overt Act No. 16**

19 On or about June 2, 2006, defendant ALI solicited conduit
20 contributor N.I.A. to make contributions from both conduit
21 contributor N.I.A. and his wife, conduit contributor S.M.A., to
22 the principal campaign committee of State Candidate 1.

23 **Overt Act No. 17**

24 On or about June 2, 2006, defendant ALI caused conduit
25 contributor N.I.A. and his wife, conduit contributor S.M.A., to
26 make three \$500 contributions to the principal campaign committee
27 of State Candidate 1.

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1 **Overt Act No. 18**

2 On or about June 2, 2006, defendant ALI gave to conduit
3 contributor N.I.A. cash in the amount of \$1,500 in order to
4 reimburse conduit contributor N.I.A. and his wife, conduit
5 contributor S.M.A., for three conduit contributions to the
6 principal campaign committee of State Candidate 1.

7 **Overt Act No. 19**

8 On or about December 9, 2007, defendant ALI solicited
9 conduit contributor S.M.A. to make contributions from both
10 conduit contributor S.M.A. and her husband, conduit contributor
11 N.I.A., to the principal campaign committee of Federal
12 Candidate 1.

13 **Overt Act No. 20**

14 On or about December 9, 2007, defendant ALI solicited
15 conduit contributor S.M.A. to make contributions from both
16 conduit contributor S.M.A. and her husband, conduit contributor
17 N.I.A., to the principal campaign committee of Federal
18 Candidate 2.

19 **Overt Act No. 21**

20 On or about December 9, 2007, defendant ALI caused conduit
21 contributor S.M.A. and her husband, conduit contributor N.I.A.,
22 to each make a \$2,300 contribution to the principal campaign
23 committee of Federal Candidate 1.

24 **Overt Act No. 22**

25 On or about December 9, 2007, defendant ALI caused conduit
26 contributor S.M.A. and her husband, conduit contributor N.I.A.,
27 to each make a \$2,300 contribution to the principal campaign
28 committee of Federal Candidate 2.

1 **Overt Act No. 23**

2 On or about December 8, 2007, defendant ALI wrote out a bank
3 check bearing number 1021 in the amount of \$6,000 drawn on
4 defendant ALI's bank account in order to reimburse conduit
5 contributor N.I.A. and his wife, conduit contributor S.M.A., for
6 conduit contributions to the principal campaign committees of
7 Federal Candidate 1 and Federal Candidate 2.

8 **Overt Act No. 24**

9 On or about March 1, 2008, defendant ALI solicited conduit
10 contributor S.M.A. to make contributions from both conduit
11 contributor S.M.A. and her husband, conduit contributor N.I.A.,
12 to the principal campaign committee of Federal Candidate 3.

13 **Overt Act No. 25**

14 On or about March 1, 2008, defendant ALI caused conduit
15 contributor S.M.A. to write one check totaling \$9,200, which
16 accounted for two \$4,600 contributions, to the principal campaign
17 committee of Federal Candidate 3.

18 **Overt Act No. 26**

19 On or about March 1, 2008, defendant ALI gave to conduit
20 contributor S.M.A. cash in the amount of \$9,200 in order to
21 reimburse conduit contributor S.M.A. and her husband, conduit
22 contributor N.I.A., for conduit contributions to the principal
23 campaign committee of Federal Candidate 3.

24 **Conduit Contributors A.A. and M.A.**

25 **Overt Act No. 27**

26 On or about June 4, 2006, defendant ALI solicited conduit
27 contributor A.A. to make a contribution for both conduit
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1 contributor A.A. and his wife, conduit contributor M.A., to the
2 principal campaign committee of State Candidate 1.

3 **Overt Act No. 28**

4 On or about June 4, 2006, defendant ALI caused conduit
5 contributor A.A. and his wife, conduit contributor M.A., to each
6 make a \$500 contribution to the principal campaign committee of
7 State Candidate 1.

8 **Overt Act No. 29**

9 On or about June 4, 2006, defendant ALI gave to conduit
10 contributor A.A. cash in the amount of \$1,000 in order to
11 reimburse conduit contributor A.A. and his wife, conduit
12 contributor M.A., for conduit contributions to the principal
13 campaign committee of State Candidate 1.

14 **Overt Act No. 30**

15 On or about March 1, 2008, defendant ALI solicited conduit
16 contributor A.A. to make a contribution for both conduit
17 contributor A.A. and his wife, conduit contributor M.A., to the
18 principal campaign of Federal Candidate 3.

19 **Overt Act No. 31**

20 On or about March 1, 2008, defendant ALI caused conduit
21 contributor A.A. to write one check totaling \$9,200, which
22 accounted for two \$4,600 contributions to the principal campaign
23 committee of Federal Candidate 3.

24 **Overt Act No. 32**

25 On or about March 1, 2008, defendant ALI gave to conduit
26 contributor A.A. cash in the amount of \$9,200 in order to
27 reimburse conduit contributor A.A. and his wife, conduit
28

1 contributor M.A., for conduit contributions to the principal
2 campaign committee of Federal Candidate 3.

3 **Conduit Contributors I.M. and S.M.**

4 **Overt Act No. 33**

5 On or about June 3, 2006, defendant ALI solicited conduit
6 contributor I.M. to make contributions from both conduit
7 contributor I.M. and his wife, conduit contributor S.M., to the
8 principal campaign committee of State Candidate 1.

9 **Overt Act No. 34**

10 On or about June 3, 2006, defendant ALI caused conduit
11 contributor I.M. and his wife, conduit contributor S.M., to each
12 make a \$500 contribution to the principal campaign committee of
13 State Candidate 1.

14 **Overt Act No. 35**

15 On or about June 3, 2006, defendant ALI gave to conduit
16 contributor I.M. cash in the amount of \$1,000 in order to
17 reimburse conduit contributor I.M. and his wife, conduit
18 contributor S.M., for conduit contributions to the principal
19 campaign committee of State Candidate 1.

20 **Overt Act No. 36**

21 On or about December 9, 2007, defendant ALI solicited
22 conduit contributor I.M. to make contributions for both conduit
23 contributor I.M. and his wife, conduit contributor S.M., to the
24 principal campaign committee of Federal Candidate 1.

25 **Overt Act No. 37**

26 On or about December 9, 2007, defendant ALI solicited
27 conduit contributor I.M. to make contributions for both conduit
28

1 contributor I.M. and his wife, conduit contributor S.M., to the
2 principal campaign committee of Federal Candidate 2.

3 **Overt Act No. 38**

4 On or about December 9, 2007, defendant ALI caused conduit
5 contributor I.M. and his wife, conduit contributor S.M., to each
6 make a \$2,300 contribution to the principal campaign committee of
7 Federal Candidate 1.

8 **Overt Act No. 39**

9 On or about December 9, 2007, defendant ALI caused conduit
10 contributor I.M. and his wife, conduit contributor S.M., to each
11 make a \$2,300 contribution to the principal campaign committee of
12 Federal Candidate 2.

13 **Overt Act No. 40**

14 On or about December 9, 2007, defendant ALI wrote out a bank
15 check bearing number 1026 in the amount of \$5,200 drawn on
16 defendant ALI's bank account in order to reimburse conduit
17 contributor I.M. and his wife, conduit contributor S.M., for
18 conduit contributions to the principal campaign committees of
19 Federal Candidate 1 and Federal Candidate 2.

20 **Overt Act No. 41**

21 On or about December 9, 2007, defendant ALI gave to conduit
22 contributor I.M. cash in the amount of \$4,000 in order to
23 reimburse conduit contributor I.M. and his wife, conduit
24 contributor S.M., for conduit contributions to the principal
25 campaign committees of Federal Candidate 1 and Federal Candidate
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1 **Conduit Contributors N.A. and H.A.**

2 **Overt Act No. 42**

3 On or about December 10, 2007, defendant ALI solicited
4 conduit contributor H.A. to make contributions from both conduit
5 contributor H.A. and his wife, conduit contributor N.A., to the
6 principal campaign committee of Federal Candidate 1.

7 **Overt Act No. 43**

8 On or about December 10, 2007, defendant ALI solicited
9 conduit contributor H.A. to make contributions from both conduit
10 contributor H.A. and his wife, conduit contributor N.A., to the
11 principal campaign committee of Federal Candidate 2.

12 **Overt Act No. 44**

13 On or about December 10, 2007, defendant ALI caused conduit
14 contributor H.A. and his wife, conduit contributor N.A., to each
15 make a \$2,300 contribution to the principal campaign committee of
16 Federal Candidate 1. _____

17 **Overt Act No. 45**

18 On or about December 10, 2007, defendant ALI caused conduit
19 contributor H.A. and his wife, conduit contributor N.A., to each
20 make a \$2,300 contribution to the principal campaign committee of
21 Federal Candidate 2.

22 **Overt Act No. 46**

23 On or about December 13, 2007, defendant ALI wrote out a
24 bank check bearing number 1037 in the amount of \$3,000 drawn on
25 defendant ALI's bank account in order to reimburse conduit
26 contributor H.A. and his wife, conduit contributor N.A., for
27 conduit contributions to the principal campaign committees of
28 Federal Candidate 1 and Federal Candidate 2.

1 **Overt Act No. 47**

2 On or about December 15, 2007, defendant ALI wrote out a
3 bank check bearing number 1035 in the amount of \$3,000 drawn on
4 defendant ALI's bank account in order to reimburse conduit
5 contributor H.A. and his wife, conduit contributor N.A., for
6 conduit contributions to the principal campaign committees of
7 Federal Candidate 1 and Federal Candidate 2.

8 **Overt Act No. 48**

9 On or about December 16, 2007, defendant ALI wrote out a
10 bank check bearing number 1036 in the amount of \$2,200 drawn on
11 defendant ALI's bank account in order to reimburse conduit
12 contributor H.A. and his wife, conduit contributor N.A., for
13 conduit contributions to the principal campaign committees of
14 Federal Candidate 1 and Federal Candidate 2.

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COUNT TWO

[2 U.S.C. §§ 441f, 437g(d); 18 U.S.C. § 2]

27. In or about December 2007, in Los Angeles, Orange, San Bernardino, and Riverside Counties, within the Central District of California, and elsewhere, defendant ALA'A AL-ALI, also known as Ala'a Mohy Eddin Elali, also known as Alaa Al-Ali ("ALI"), knowingly and willfully violated the FECA by making, and causing to be made, contributions in the names of other persons that aggregated \$25,000 or more during the 2007 calendar year. More specifically, defendant ALI knowingly and willfully caused other persons to contribute to the principal campaign committees of Federal Candidate 1 and Federal Candidate 2, respectively, authorized political committees supporting the election of a candidate for President of the United States, and advanced to those persons and reimbursed those persons a total of \$25,000 or more for their contributions:

<u>Contribution</u> <u>Amount</u>	<u>Conduit</u> <u>Contributor</u>	<u>Campaign</u>
\$2,300	H.A.	Federal Candidate 1
\$2,300	N.A.	Federal Candidate 1
\$2,300	F.A.	Federal Candidate 1
\$2,300	S.A.	Federal Candidate 1
\$2,300	N.I.A.	Federal Candidate 1
\$2,300	S.M.A.	Federal Candidate 1
\$2,300	I.M.	Federal Candidate 1
\$2,300	S.M.	Federal Candidate 1
\$2,300	H.A.	Federal Candidate 2
\$2,300	N.A.	Federal Candidate 2

	<u>Contribution</u>	<u>Conduit</u>	<u>Campaign</u>
	<u>Amount</u>	<u>Contributor</u>	
2	\$2,300	F.A.	Federal Candidate 2
3	\$2,300	S.A.	Federal Candidate 2
4	\$2,300	N.I.A.	Federal Candidate 2
5	\$2,300	S.M.A.	Federal Candidate 2
6	\$2,300	I.M.	Federal Candidate 2
7	\$2,300	S.M.	Federal Candidate 2
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COUNT THREE

[2 U.S.C. §§ 441f, 437g(d); 18 U.S.C. § 2]

28. On or about March 17, 2008, in Los Angeles, Orange, San Bernardino, and Riverside Counties, within the Central District of California, and elsewhere, defendant ALA'A AL-ALI, also known as Ala'a Mohy Eddin Elali, also known as Alaa Al-Ali ("ALI"), knowingly and willfully violated the FECA by making, and causing to be made, contributions in the names of other persons that aggregated \$25,000 or more during the 2008 calendar year. More specifically, defendant ALI knowingly and willfully caused other persons to contribute to the principal campaign committee of Federal Candidate 3, an authorized political committee supporting the election of a candidate for President of the United States, and advanced to those persons and reimbursed those persons a total of \$25,000 or more for their contributions:

<u>Contribution</u> <u>Amount</u>	<u>Conduit</u> <u>Contributor</u>	<u>Campaign</u>
\$4,600	A.A.	Federal Candidate 3
\$4,600	F.A.	Federal Candidate 3
\$4,600	M.A.	Federal Candidate 3
\$4,600	S.A.	Federal Candidate 3
\$4,600	N.I.A.	Federal Candidate 3
\$4,600	S.M.A.	Federal Candidate 3

COUNT FOUR

[2 U.S.C. §§ 441e, 437g(d); 18 U.S.C. § 2]

29. In or about December 2007, in Los Angeles, Orange, San Bernardino, and Riverside Counties, within the Central District of California, and elsewhere, defendant ALA'A AL-ALI, also known as Ala'a Mohy Eddin Elali, also known as Alaa Al-Ali ("ALI"), knowingly and willfully violated the FECA by making, and causing to be made, contributions by a foreign national that aggregated \$25,000 or more during the 2007 calendar year. More specifically, defendant ALI, a foreign national, knowingly and willfully caused other persons to contribute to the principal campaign committees of Federal Candidate 1 and Federal Candidate 2, authorized political committees supporting the election of a candidate for President of the United States, and advanced to those persons and reimbursed those persons a total of \$25,000 or more for their contributions:

<u>Contribution</u> <u>Amount</u>	<u>Conduit</u> <u>Contributor</u>	<u>Campaign</u>
\$2,300	H.A.	Federal Candidate 1
\$2,300	N.A.	Federal Candidate 1
\$2,300	F.A.	Federal Candidate 1
\$2,300	S.A.	Federal Candidate 1
\$2,300	N.I.A.	Federal Candidate 1
\$2,300	S.M.A.	Federal Candidate 1
\$2,300	I.M.	Federal Candidate 1
\$2,300	S.M.	Federal Candidate 1
\$2,300	H.A.	Federal Candidate 2
\$2,300	N.A.	Federal Candidate 2

	<u>Contribution</u>	<u>Conduit</u>	<u>Campaign</u>
	<u>Amount</u>	<u>Contributor</u>	
2	\$2,300	F.A.	Federal Candidate 2
3	\$2,300	S.A.	Federal Candidate 2
4	\$2,300	N.I.A.	Federal Candidate 2
5	\$2,300	S.M.A.	Federal Candidate 2
6	\$2,300	I.M.	Federal Candidate 2
7	\$2,300	S.M.	Federal Candidate 2
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COUNT FIVE

[2 U.S.C. §§ 441e, 437g(d); 18 U.S.C. § 2]

30. On or about March 17, 2008, in Los Angeles, Orange, San Bernardino, and Riverside Counties, within the Central District of California, and elsewhere, defendant ALA'A AL-ALI, also known as Ala'a Mohy Eddin Elali, also known as Alaa Al-Ali ("ALI"), knowingly and willfully violated the FECA by making, and causing to be made, contributions by a foreign national that aggregated \$25,000 or more during the 2008 calendar year. More specifically, defendant ALI, a foreign national, knowingly and willfully caused other persons to contribute to the principal campaign committee of Federal Candidate 3, an authorized political committee supporting the election of a candidate for President of the United States, and advanced to those persons and reimbursed those persons a total of \$25,000 or more for their contributions:

<u>Contribution</u> <u>Amount</u>	<u>Conduit</u> <u>Contributor</u>	<u>Campaign</u>
\$4,600	A.A.	Federal Candidate 3
\$4,600	F.A.	Federal Candidate 3
\$4,600	M.A.	Federal Candidate 3
\$4,600	S.A.	Federal Candidate 3
\$4,600	N.I.A.	Federal Candidate 3
\$4,600	S.M.A.	Federal Candidate 3

COUNT SIX

[2 U.S.C. §§ 441e, 437g(d); 18 U.S.C. § 2]

31. On or about June 19, 2006, in Los Angeles, Orange, San Bernardino, and Riverside Counties, within the Central District of California, and elsewhere, defendant ALA'A AL-ALI, also known as Ala'a Mohy Eddin Elali, also known as Alaa Al-Ali ("ALI"), knowingly and willfully violated the FECA by making, and causing to be made, contributions by a foreign national that aggregated \$2,000 or more during the 2006 calendar year. More specifically, defendant ALI, a foreign national, knowingly and willfully caused other persons to contribute to the principal campaign committee of State Candidate 1, an authorized political committee supporting the election of a candidate for Governor of the State of Florida, and advanced to those persons and reimbursed those persons a total of \$2,000 or more for their contributions:

<u>Contribution</u> <u>Amount</u>	<u>Conduit</u> <u>Contributor</u>	<u>Campaign</u>
\$500	A.A.	State Candidate 1
\$500	M.A.	State Candidate 1
\$500	F.A.	State Candidate 1
\$500	S.A.	State Candidate 1
\$500	N.I.A.	State Candidate 1
\$500	N.I.A.	State Candidate 1
\$500	S.M.A.	State Candidate 1
\$500	I.M.	State Candidate 1
\$500	S.M.	State Candidate 1
\$500	W.N.	State Candidate 1

<u>Contribution</u>	<u>Conduit</u>	<u>Campaign</u>
<u>Amount</u>	<u>Contributor</u>	
\$500	W.N.	State Candidate 1

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A TRUE BILL

Foreperson

THOMAS P. O'BRIEN
United States Attorney

CHRISTINE C. EWELL
Assistant United States Attorney
Chief, Criminal Division

STEPHANIE YONEKURA McCAFFREY
Executive Assistant United States Attorney

DENNIS MITCHELL
Assistant United States Attorney
Environmental Crimes Section