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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

CRIMINAL NO. 08-20445

Plaintiff,

HON. LAWRENCE P. ZATKOFF

v.

VIOLATIONS:

18 U.S.C. § 2 Aiding and Abetting
18 U.S.C. § 371 Conspiracy to Commit
 Visa Fraud

D-1 NAZEER HAMADNEH

18 U.S.C. § 1341 Mail Fraud

D-2 ABBAS OBEID

18 U.S.C. § 1546(a) Visa Fraud

 aka Adam Obeid,

18 U.S.C. § 1349 Conspiracy To

D-3 RONI AOUB,

 Commit Mail Fraud

D-4 MAJED MAMO,

18 U.S.C. § 1512(b)(3) Witness
 Tampering

Defendants.

FIRST SUPERSEDING INDICTMENT

THE GRAND JURY CHARGES:

GENERAL ALLEGATIONS

08 OCT 15 03:49

FILED

At all times pertinent to this Indictment:

1. Defendant NAZEER HAMADNEH owned and operated American Universities Center, a Michigan corporation, with branches located in Southfield and Dearborn, Michigan.

2. Lawrence Technological University (hereinafter “Lawrence Tech”) is an educational institution located in Southfield, Michigan, which offers undergraduate and graduate degree programs.

3. Madonna University is an educational institution located in Livonia, Michigan, which offers undergraduate degree programs.

4. Girne American University is a university located in the Turkish Republic of Northern Cyprus.

5. The University of Sint Eustatius School of Medicine (hereinafter “USESM”) is a medical school located in the Netherlands Antilles which awards Doctor of Medicine degrees to students who complete its program. During the time period of this indictment, USESM maintained administrative offices in Glen Cove, New York. In August 2005, USESM entered into a contract with American Universities Center (hereinafter “AUC). Under the contract, AUC was to act as a recruitment representative for USESM and assist in the processing of prospective medical school applicants to USESM. In return, USESM agreed to pay AUC money for each student it recruited who was ultimately accepted for enrollment at USESM.

6. American Global University School of Medicine (hereinafter “AGU”) is a medical school located in Belize which awards Doctor of Medicine degrees to students who complete its program. AGU maintains administrative offices in Columbus, Ohio. In March 2007, AGU entered into an oral agreement with defendant NAZEER

HAMADNEH. Under that agreement, AUC was to act as a recruitment representative for AGU and assist in the processing of prospective applicants to AGU. In return, AGU agreed to pay AUC money for each student it recruited who was ultimately accepted for enrollment at AGU.

7. An "I-20" is an immigration document known as a "Certificate of Eligibility for Nonimmigrant Student Status." Immigration regulations require that an I-20 be issued by an approved educational entity within the United States in order for a nonimmigrant student to obtain or maintain a student visa. Immigration regulations also provide that an approved school may only issue an I-20 if certain conditions are met, including only after proof of financial responsibility for the student is received by the school.

8. Language Center International, located in Southfield, Michigan, is a school approved by immigration authorities to issue I-20s.

COUNT ONE
(CONSPIRACY TO COMMIT MAIL FRAUD -- 18 U.S.C. § 1349)

D-1 NAZEER HAMADNEH,

D-2 ABBAS OBEID

aka Adam Obeid,

D-3 RONI AOUB,

D-4 MAJED MAMO

1. The General Allegations are incorporated in this Count by reference.
2. Between on or about August 2000 and on or about August 2008, in the Eastern District of Michigan, Southern Division, defendants NAZEER HAMADNEH, ABBAS OBEID, RONI AUOB and MAJED MAMO did knowingly combine, conspire

and agree with each other and with other persons known and unknown to the grand jury to violate Title 18, United States Code, Section 1341 (Mail Fraud), by devising and executing a scheme to defraud Lawrence Tech, Madonna University, USESM, AGU and other educational institutions, and to obtain property, that is, undergraduate and graduate degrees, by means of false and fraudulent pretenses, representations or promises, and in furtherance of the scheme and in order to execute it, caused items to be sent or delivered through the United States mail or by commercial carrier.

THE SCHEME

3. In exchange for money, defendants NAZEER HAMADNEH, ABBAS OBEID, RONI AUOB and MAJED MAMO submitted and caused to be submitted fraudulent undergraduate transcripts in the name of Girne American University to medical schools on behalf of students who otherwise had insufficient undergraduate credits to enter medical school. As a result of defendants' actions, these students, including defendants RONI AUOB and MAJED MAMO, were admitted to medical school based on the submission of fraudulent undergraduate transcripts. In addition, in exchange for money, the defendants provided and submitted fraudulent transcripts in the name of Girne American University to other educational institutions so that individuals would fraudulently obtain transfer credits from those institutions to be applied toward undergraduate degrees and so that individuals would be accepted for enrollment in graduate programs.

OBJECTS OF THE CONSPIRACY

4. The primary objects of the conspiracy were:
 - (a) To obtain money from students in exchange for facilitating their enrollment into educational institutions by fraudulently providing credits for academic course work necessary for admission or transfer;
 - (b) To obtain money from AGU and USESM by supplying applicants for enrollment whose applications included fraudulent undergraduate transcripts in the name of Girne American University;
 - (c) To obtain money from students by fraudulently representing that their money would be applied to tuition and instead retaining that money;
 - (d) To evade detection of their fraudulent activities by attempting to corruptly persuade students to falsely claim to school officials and to the Federal Bureau of Investigation that they had completed course work through independent study for the credits reflected on the fraudulent transcripts.

MANNER AND MEANS OF THE CONSPIRACY

5. The defendants NAZEER HAMADNEH and ABBAS OBEID met with customers of AUC about applying to schools;

6. Defendants NAZEER HAMADNEH and ABBAS OBEID assessed the academic credits the customer had earned from legitimate educational institutions and determined how many additional credits were necessary for the customer to apply for

medical school;

7. Defendants NAZEER HAMADNEH and ABBAS OBEID for a fee, manufactured and caused to be manufactured fraudulent academic transcripts in the name of Girne American University for customers of AUC.

8. Defendants NAZEER HAMADNEH and ABBAS OBEID charged fees to provide college-level credits, reflected on fraudulent transcripts, for submission with medical school applications to GAU and USESM.

9. Defendants NAZEER HAMADNEH, ABBAS OBEID, RONI AOUB and MAJED MAMO submitted and caused to be submitted applications to Lawrence Tech, Madonna University, USESM and AGU which included fraudulent transcripts bearing the name of Girne American University.

10. Defendants NAZEER HAMADNEH, ABBAS OBEID, RONI AOUB and MAJED MAMO caused Lawrence Tech, USESM and AGU to send acceptance letters to AUC customers through the United States mail or by commercial carrier.

11. Defendants NAZEER HAMADNEH and ABBAS OBEID defrauded students of their money by falsely representing that AUC would pay the student's tuition with their money and instead HAMADNEH and OBEID retained the money;

12. Defendants NAZEER HAMADNEH, ABBAS OBEID, RONI AOUB and MAJED MAMO made efforts to evade detection of their fraudulent activities by attempting to corruptly persuade students to falsely claim to school officials and to the

Federal Bureau of Investigation that they had completed course work through independent study for the credits reflected on the fraudulent transcripts.

13. All in violation of Title 18 United States Code, Sections 1341 and 1349.

COUNTS TWO THROUGH SEVENTEEN
(MAIL FRAUD, AIDING AND ABETTING -- 18 U.S.C. §§ 1341, 2)

- D-1 NAZEER HAMADNEH**
- D-2 ABBAS OBEID**
aka Adam Obeid
- D-3 RONI AOUB**
- D-4 MAJED MAMO**

1. The General Allegations and paragraph 3 of Count One are incorporated in this Count by reference.

2. Between on or about the dates listed below, the named defendant(s) caused items to be sent or delivered through the United States mail or by commercial carrier in order to further or execute their scheme to defraud Lawrence Tech, USESM and AGU and to obtain property, that is, undergraduate and graduate degrees, by means of false and fraudulent pretenses, representations or promises.

Ct	Defendant(s)	Date	Mailing	Purpose of Mailing
2	D-1 HAMADNEH	5/11/04	Lawrence Tech acceptance letter to MS	To notify of acceptance into undergraduate school
3	D-1 HAMADNEH	5/18/04	Lawrence Tech letter acceptance to KN	To notify of acceptance into undergraduate school
4	D-1 HAMADNEH D-3 AOUB	8/25/05	USESM acceptance letter to HY	To notify of acceptance into medical school

5	D-1 HAMADNEH D-3 AOUB	8/25/05	USESM acceptance letter to ZK	To notify of acceptance into medical school
6	D-1 HAMADNEH	4/25/06	Lawrence Tech acceptance letter to AM	To notify of acceptance into graduate school
7	D-1 HAMADNEH D-3 AOUB	8/7/06	USESM acceptance letter to Roni Aoub	To notify of acceptance into medical school
8	D-1 HAMADNEH	4/15/07	AGU acceptance letter to YM	To notify of acceptance into medical school
9	D-1 HAMADNEH	4/15/07	AGU acceptance letter to NH	To notify of acceptance into medical school
10	D-1 HAMADNEH	4/15/07	AGU acceptance letter to MH	To notify of acceptance into medical school
11	D-1 HAMADNEH	4/16/07	USESM acceptance letter to AK	To notify of acceptance into medical school
12	D-1 HAMADNEH	8/24/07	USESM acceptance letter to MS	To notify of acceptance into medical school
13	D-1 HAMADNEH	8/28/07	USESM acceptance letter to TZ	To notify of acceptance into medical school
14	D-1 HAMADNEH	8/28/07	USESM acceptance letter to SF	To notify of acceptance into medical school
15	D-1 HAMADNEH D-4 MAMO	9/5/07	USESM acceptance letter to Majed Mamo	To notify of acceptance into medical school
16	D-1 HAMADNEH D-4 MAMO	9/5/07	USESM acceptance letter to AS	To notify of acceptance into medical school
17	D-1 HAMADNEH D-2 OBEID	4/23/08	USESM medical school application for KA	To gain acceptance to medical school

3. All in violation of Title 18, United States Code, Sections 1341 and 2.

COUNT EIGHTEEN
(WITNESS TAMPERING – 18 U.S.C. § 1512(b)(3))

D-1 NAZEER HAMADNEH

On or about August 13, 2008, in the Eastern District of Michigan, Southern Division, defendant NAZEER HAMADNEH did knowingly attempt to corruptly persuade ZK to provide false information to a federal law enforcement officer, that is, a Special Agent of the Federal Bureau of Investigation, with the intent to hinder, delay and prevent the communication to a law enforcement officer of information relating to the possible commission of a federal offense, namely, mail fraud, in violation of Title 18, United States Code, Section 1512(b)(3).

COUNT NINETEEN
(WITNESS TAMPERING – 18 U.S.C. § 1512(b)(3))

D-4 MAJED MAMO

On or about July 25, 2008, in the Eastern District of Michigan, Southern Division, defendant MAJED MAMO did knowingly attempt to corruptly persuade AA to provide false information to a federal law enforcement officer, that is, a Special Agent of the Federal Bureau of Investigation, with the intent to hinder, delay and prevent the communication to a law enforcement officer of information relating to the possible commission of a federal offense, namely, mail fraud, in violation of Title 18, United States Code, Section 1512(b)(3).

COUNT TWENTY
(WITNESS TAMPERING – 18 U.S.C. § 1512(b)(3))

D-4 MAJED MAMO

On or about August 15, 2008, in the Eastern District of Michigan, Southern Division, defendant MAJED MAMO did knowingly attempt to corruptly persuade KA to provide false information to a federal law enforcement officer, that is, a Special Agent of the Federal Bureau of Investigation, with the intent to hinder, delay and prevent the communication to a law enforcement officer of information relating to the possible commission of a federal offense, namely, mail fraud, in violation of Title 18, United States Code, Section 1512(b)(3).

COUNT TWENTY-ONE
(CONSPIRACY TO COMMIT VISA FRAUD – 18 U.S.C. § 371)

D-1 NAZEER HAMADNEH

D-2 ABBAS OBEID

aka Adam Obeid

1. The General Allegations are incorporated in this Count by reference.
2. Between on or about January 7, 2008 and on or about January 31, 2008, in the Eastern District of Michigan, Southern Division, defendants NAZEER HAMADNEH and ABBAS OBEID did knowingly combine, conspire and agree with each other and persons known and unknown to the grand jury to violate Title 18, United States Code, Section 1546(a) (Visa Fraud) by presenting documents on behalf of nonimmigrant student ZA to Language Center International consisting of proof of financial

responsibility, that is, a forged letter of financial sponsorship and a bank statement, required by immigration laws and regulations, which contained a false statement with respect to a material fact and which failed to contain any reasonable basis in law or fact.

OBJECTS OF THE CONSPIRACY

3. The primary objects of the conspiracy were:
 - (a) To ensure the issuance by Language Center International of an I-20 on behalf of nonimmigrant student ZA so that he would retain his student visa status in the United States;
 - (b) To obtain money from nonimmigrant student ZA in exchange for fraudulent proof of financial responsibility.

MANNER AND MEANS OF THE CONSPIRACY

4. The defendant NAZEER HAMADNEH received a bank statement from a customer of AUC. Defendants NAZEER HAMADNEH and ABBAS OBEID then submitted that bank statement, along with a fraudulent letter of sponsorship with a forged signature of the AUC customer, to Language Center International as proof of financial responsibility for a nonimmigrant student, ZA. Language Center International, relying on the fraudulent proof of financial responsibility, issued an I-20 for nonimmigrant student ZA which reflected the fraudulent sponsorship information.

OVERT ACTS

5. On January 7, 2007, defendants NAZEER HAMADNEH and ABBAS

OBEID met with nonimmigrant student ZA and discussed his enrollment in Language Center International and the issuance of an I-20 for him by that school;

6. On that same date, defendant NAZEER HAMADNEH informed nonimmigrant student ZA that defendant HAMADNEH would obtain a bank statement for him for submission to the Language Center International so that an I-20 would issue; defendant ABBAS OBEID indicated that he would provide the bank statement to Language Center International on behalf of nonimmigrant student ZA;

7. On January 16, 2008, defendant ABBAS OBEID submitted the bank statement of another AUC customer and a fraudulent letter of sponsorship with the forged signature of the AUC customer to Language Center International for issuance of an I-20 on behalf of nonimmigrant student ZA.

8. All in violation of Title 18 United States Code, Section 371.

COUNT TWENTY-TWO
(VISA FRAUD, AIDING & ABETTING – 18 U.S.C. §§ 1546(a), 2)

D-1 NAZEER HAMADNEH

D-2 ABBAS OBEID

aka Adam Obeid

1. Between on or about January 16, 2008, within the Eastern District of Michigan, Southern Division, defendants NAZEER HAMADNEH and ABBAS OBEID, knowingly presented documents to Language Center International on behalf of nonimmigrant student ZA consisting of proof of financial responsibility, that is, a bank statement and a forged financial sponsorship statement, required by immigration laws and

regulations, which contained a false statement with respect to a material fact and which failed to contain any reasonable basis in law or fact

2. All in violation of 18 United States Code, Section 1546(a) and 2.

COUNT TWENTY-THREE
(VISA FRAUD – 18 U.S.C. § 1546(a))

D-1 NAZEER HAMADNEH

1. Between on or about January 11, 2007, within the Eastern District of Michigan, Southern Division, defendant NAZEER HAMADNEH, knowingly presented a document to Language Center International on behalf of nonimmigrant student MA consisting of proof of financial responsibility, that is, a bank statement, required by immigration laws and regulations, which contained a false statement with respect to a material fact and which failed to contain any reasonable basis in law or fact.

2. All in violation of 18 United States Code, Section 1546(a).

COUNT TWENTY-FOUR
(VISA FRAUD – 18 U.S.C. § 1546(a))

D-1 NAZEER HAMADNEH

1. Between on or about August 27, 2007, within the Eastern District of Michigan, Southern Division, defendant NAZEER HAMADNEH, knowingly presented documents to Language Center International on behalf of his nephew, nonimmigrant student OS, consisting of proof of financial responsibility, that is, a bank letter and a forged letter of financial sponsorship, required by immigration laws and regulations,

which contained a false statement with respect to a material fact and which failed to contain any reasonable basis in law or fact.

2. All in violation of 18 United States Code, Section 1546(a).

THIS IS A TRUE BILL.

s/GRAND JURY FOREPERSON

TERRENCE BERG
Acting United States Attorney

s/JONATHAN TUKEL
Assistant United States Attorney

s/CATHLEEN M. CORKEN
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Dated: October 15, 2008

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United States District Court Eastern District of Michigan	Criminal Case Cover Sheet	Case Number 08-20445
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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.

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

Case Title: USA v. NAZEER HAMADNEH et.al.

County where offense occurred : Wayne

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: 08-20445 **Judge:** Lawrence Zatkoff

- 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>
D-1 NAZEER HAMADNEH	18 U.S.C. § 1349, 1341,2, 371, 1546(a), 2
D-2 ABBAS OBEID	18 U.S.C. §1349, 1341, 2, 371, 1546(a), 2,
D-3 RONI AOUB	18 U.S.C. § 1349, 1341, 2,
D-4 MAJED MAMO	18 U.S.C. § 1349, 1341, 2, 1512(b)(3),

Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.

October 15, 2008
Date



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