

4.

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

SAMIR FADHIL MAHMOUD,

Defendant.

Case: 2:06-cr-20518
Assigned To: Rosen, Gerald E
Referral Judge: Whalen, R. Steven
Filed: 09-28-2006 At 02:46 PM
INFO USA V. MAHMOUD (TAM)

Violation: 18 U.S.C. § 1001

Offense: False Statements

INFORMATION

THE UNITED STATES ATTORNEY CHARGES:

COUNT ONE

1. From April 2005 until the present, **SAMIR FADHIL MAHMOUD** worked for a construction company ("Company") receiving funds from the United States Air Force to assist in the reconstruction of Iraq. **MAHMOUD**'s jobs included acting as a Project Manager for the building of military recruitment centers in Hilla and Mosul, Iraq.

2. Beginning in 2005 and continuing through the present, the Defense Criminal Investigative Service (DCIS), U.S. Immigration and Customs Enforcement (U.S. ICE), and other law enforcement agencies were conducting an investigation into allegations of illegal payments and gifts offered or made to Company employees in exchange for promised assistance in obtaining, retaining or altering contracts and subcontracts associated with the reconstruction of Iraq.

3. On or about July 16, 2006, **MAHMOUD** traveled from his permanent residence, located in the Eastern District of Michigan, to the Eastern District of Texas for the purpose of providing information to the DCIS and U.S. ICE officials investigating the alleged illegal activities.

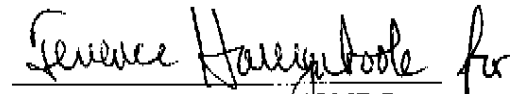
4. On or about July 17, 2006, in the Eastern District of Texas and elsewhere, in a matter within the jurisdiction of the executive branch of the Government of the United States, that is, the above-described investigation, the defendant, **SAMIR FADHIL MAHMOUD**, did knowingly and willfully make a materially false, fictitious and fraudulent statement and representation as to a material fact, in that, **MAHMOUD** falsely stated that he had not offered or provided any things of value in excess of \$50 to Company employees, when in truth and in fact, as defendant **MAHMOUD** well knew, defendant **MAHMOUD** had offered and provided things valued far in excess of \$50 to at least one Company employee.

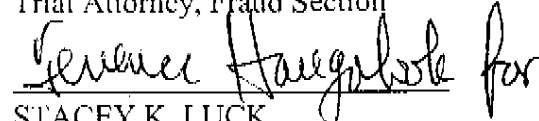
In violation of Title 18, United States Code, Section 1001(a)(2).

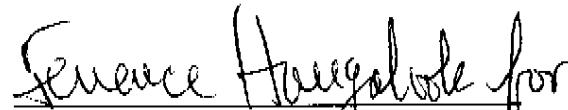
STEPHEN J. MURPHY
United States Attorney
Eastern District of Michigan

STEVEN A. TYRRELL
Acting Chief, Fraud Section
Criminal Division
United States Department of Justice

Dated: 9/28/06


NATHANIEL B. EDMONDS
Trial Attorney, Fraud Section


STACEY K. LUCK
Trial Attorney, Fraud Section
Criminal Division
United States Department of Justice


REGINA R. MCCULLOUGH (P64936)
Assistant United States Attorney

Companion Case information MUST be completed by AUSA and initialed

United States District Court
Eastern District of Michigan

Criminal Case (

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NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to

Companion Case Information

This may be a companion case based upon LCrR 57.10 (b)(4)':

Yes No

Companion Case Number:

Judge Assigned:

AUSA's Initials:

Case Title: USA v. Samir Fadhil Mahmoud

County where offense occurred : Eastern District Michigan and elsewhere

Check One: Felony Misdemeanor Petty

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

Superseding Case Information:

Superseding to Case No: _____ Judge: _____

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

Defendant name

Charges

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

9/28/06

Date

Regina McCullough for

Regina McCullough (Requires AUSA's signature)
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