

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>UNITED STATES OF AMERICA</b>	<b>:</b>	<b>CRIMINAL NO:</b> _____
<b>v.</b>	<b>:</b>	<b>DATE FILED:</b> _____
<b>THE ORDER OF FLEAS</b>	<b>:</b>	<b>VIOLATIONS: 18 U.S.C. § 371</b>
<b>ANTHONY HANNI</b>	<b>:</b>	<b>(Conspiracy - 3 counts)</b>
<b>HABOUK SHUMAR</b>	<b>:</b>	<b>18 U.S.C. § 1955</b>
<b>a/k/a "Bootsie"</b>	<b>:</b>	<b>(Illegal Gambling Business-</b>
<b>RUSSELL HIXON</b>	<b>:</b>	<b>1 Count)</b>
<b>JAMES DURNIN, SR.</b>	<b>:</b>	<b>31 U.S.C. § 5324(a)(3)</b>
	<b>:</b>	<b>(Structuring financial</b>
	<b>:</b>	<b>transactions to evade CTR</b>
	<b>:</b>	<b>reporting requirements - 1 Count)</b>
	<b>:</b>	<b>18 U.S.C. § 1956(h)</b>
	<b>:</b>	<b>(Money Laundering Conspiracy</b>
	<b>:</b>	<b>- 1 count)</b>
	<b>:</b>	<b>18 U.S.C. § 1956(a)(1)(B)(i)</b>
	<b>:</b>	<b>(Money Laundering - 1 count)</b>
	<b>:</b>	<b>18 U.S.C. § 2</b>
	<b>:</b>	<b>(Aiding and Abetting)</b>
<b>18 U.S.C. § 982</b>	<b>:</b>	<b>(Notice of Forfeiture)</b>

**INFORMATION**

**COUNT ONE**

**(CONSPIRACY TO CONDUCT AN ILLEGAL GAMBLING BUSINESS)**

**THE UNITED STATES ATTORNEY CHARGES THAT:**

At all times material to the Information:

**THE DEFENDANTS**

1. Defendant THE ORDER OF FLEAS was a private men's social club located at

601-617 Reynolds Street, Easton, Pennsylvania.

2. Defendants RUSSELL HIXON and JAMES DURNIN, SR. were members of the board of directors of defendant ORDER OF FLEAS. HIXON became Chairman of the Board during 1995.

3. Defendants ANTHONY HANNI and HABOUK SHUMAR were engaged in the business of supplying and leasing vending and gambling machines to social clubs operating within Northampton and Lehigh Counties through their businesses M&M Amusement Company and Downtown Amusements, Inc. located in Easton, Pennsylvania.

### **THE ORDER OF FLEAS' GAMBLING BUSINESS**

4. It was a violation of the laws of the Commonwealth of Pennsylvania to intentionally or knowingly maintain or lease any device to be used for gambling purposes; to allow persons to collect and assemble for the purpose of unlawful gambling at any place under one's control; and, being the owner, tenant, lessee or occupant of any premises, to knowingly permit any part thereof to be used for the purpose of unlawful gambling.

5. A video poker machine is an electronic device which permits the player of the machine to play the game of poker for a set monetary amount. A video poker machine that contains a "knock down" button, which removes accumulated credits, and a meter, which records the number of credits knocked down, is a gambling device under the laws of the Commonwealth of Pennsylvania. These machines are designed and operated to enable the owner or lessee of the machines to make monetary payoffs of gambling winnings to players of the machines.

6. Defendants ANTHONY HANNI and HABOUK SHUMAR supplied and leased video poker machines to defendant ORDER OF FLEAS which were programmed for use as gambling devices, each containing a "knock down" button and meter, in violation of the laws of the Commonwealth of Pennsylvania.

7. Between in or about January 1994 and on or about June 4, 2003, defendant ORDER OF FLEAS conducted an illegal gambling business using the video poker machines leased

from defendants ANTHONY HANNI and HABOUK SHUMAR. The gambling business was in substantially continuous operation for periods in excess of thirty days; had a gross revenue of \$2,000 on various days during these periods; was conducted, financed, managed, supervised, directed, and owned by five or more persons; and violated the provisions of the laws of the Commonwealth of Pennsylvania, namely Title 18, Pennsylvania Consolidated Statutes, Sections 5513 (a)(1), 5513 (a)(2) and 5513 (a)(4).

### **THE CONSPIRACY**

8. Between in or about January 1994 and on or about June 4, 2003, in the Eastern District of Pennsylvania and elsewhere, defendants

**THE ORDER OF FLEAS**  
**ANTHONY HANNI**  
**HABOUK SHUMAR**  
**a/k/a "Bootsie"**  
**JAMES DURNIN, SR. and**  
**RUSSEL HIXON**

did conspire and agree together and with others known and unknown, to commit an offense against the United States, that is, to intentionally and knowingly conduct, finance, manage, supervise, direct and own all or part of an illegal gambling business, as that term is defined in Title 18, United States Code, Sections 1955(b)(1)(i), 1955(b)(1)(ii), and 1955(b)(1)(iii), in violation of Title 18, United States Code, Section 1955.

### **THE MANNER AND MEANS OF THE CONSPIRACY**

It was part of the conspiracy that:

9. Defendant ORDER OF FLEAS operated an illegal gambling business using video poker machines designed and manufactured as gambling devices.

10. Defendant ORDER OF FLEAS selected defendants ANTHONY HANNI and

HABOUK SHUMAR to supply and lease video poker machines to defendant ORDER OF FLEAS for use in gambling activity.

11. Defendants ORDER OF FLEAS, RUSSELL HIXON and JAMES DURNIN, SR. paid as a leasing fee to defendants ANTHONY HANNI and HABOUK SHUMAR two per cent of all money paid into the video poker machines at the ORDER OF FLEAS.

12. Defendants ANTHONY HANNI and HABOUK SHUMAR kicked back to defendants RUSSELL HIXON and JAMES DURNIN, SR. a portion of the gambling proceeds they received from defendant ORDER OF FLEAS.

### **OVERT ACTS**

In furtherance of the conspiracy and to accomplish its object, the following overt acts, among others, were committed in the Eastern District of Pennsylvania and elsewhere:

1. In or about the beginning of 1994, defendant ORDER OF FLEAS selected defendants ANTHONY HANNI and HABOUK SHUMAR to supply and lease video poker gambling machines to the ORDER OF FLEAS.

2. In or about the beginning of 1994, defendants RUSSELL HIXON and JAMES DURNIN, SR. agreed with defendants ANTHONY HANNI and HABOUK SHUMAR that defendant ORDER OF FLEAS would lease the video poker machines from HANNI and SHUMAR for two per cent of all money paid into the video poker gambling machines.

3. Between in or about January 1994 and on or about June 4, 2003, members of defendant ORDER OF FLEAS paid into the video poker machines at the ORDER OF FLEAS approximately \$8,941,000. The ORDER OF FLEAS paid gambling winnings to members of the ORDER OF FLEAS.

4. Between in or about January 1994 and on or about June 4, 2003, defendant ORDER OF FLEAS paid to defendants ANTHONY HANNI and HABOUK SHUMAR approximately \$1,899,451 for the leasing of the video poker machines.

5. Between at least early 1998 and continuing until the spring of 2003, defendants

ANTHONY HANNI and HABOUK SHUMAR kicked back to defendants RUSSELL HIXON and JAMES DURNIN, SR. approximately \$1,000 per week from the gambling proceeds they received from defendant ORDER OF FLEAS.

6. Between in or about 1994 and continuing through 2002, defendants ANTHONY HANNI and HABOUK SHUMAR kicked back to defendants RUSSELL HIXON and JAMES DURNIN, SR. approximately \$10,000 each summer and Christmas season from the gambling proceeds they received from the ORDER OF FLEAS.

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

**COUNT**

**TWO**

**(CONDUCTING AN ILLEGAL GAMBLING BUSINESS)**

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

From in or about February 1999 and continuing up to and including on or about June 4, 2003, in the Eastern District of Pennsylvania and elsewhere, defendants

**THE ORDER OF FLEAS  
ANTHONY HANNI  
HABOUK SHUMAR  
a/k/a "Bootsie"  
JAMES DURNIN, SR.  
RUSSEL HIXON**

did intentionally and knowingly conduct, finance, manage, supervise, direct, and own all or part of, and aid and abet in the conducting of, an illegal gambling business as that term is defined in Title 18, United States Code, Section 1955(b), that is, a gambling business in violation of the laws of Pennsylvania, in

that the defendants --

- a. intentionally and knowingly maintained and leased a device to be used for gambling purposes, in violation of the laws of the Commonwealth of Pennsylvania, Title 18, Pennsylvania Consolidated Statutes, Section 5513(a)(1);
- b. allowed persons to collect and assemble at 601-617 Reynolds Street, Easton, Pennsylvania for the purpose of unlawful gambling, in violation of the laws of the Commonwealth of Pennsylvania, Title 18, Pennsylvania Consolidated Statutes, Section 5513(a)(2); and
- c. being the owner of 601-617 Reynolds Street, Easton, Pennsylvania, knowingly permitted any part thereof to be used for the purpose of unlawful gambling, in violation of Title 18, Pennsylvania Consolidated Statutes, Section 5513(a)(4),

and said gambling business, which involved five or more persons who conducted, financed, managed, supervised, directed and owned all and part of said business, remained in substantially continuous operation for a period of in excess of thirty days, and had a gross revenue in excess of \$2,000 in a single day.

In violation of Title 18, United States Code, Section 1955 and Section 2.

**COUNT THREE**  
**(CONSPIRACY TO STRUCTURE FINANCIAL TRANSACTIONS)**

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

1. Federal law requires that a financial institution file with the Commissioner of Internal Revenue a report of all currency transactions involving more than \$10,000. These reports are referred to as "Currency Transaction Reports" or "CTRs."

2. Federal law forbids any individual or entity from structuring or assisting in structuring currency transactions with one or more financial institutions for the purpose of evading the foregoing reporting requirements.

3. First Star Savings Bank ("First Star"), with a branch location at Northwood Avenue, Palmer, Pennsylvania, was a financial institution required by federal law to file CTR reports. Defendant ORDER OF FLEAS maintained an account at the bank beginning in or about November, 1990 through in or about December 2002.

4. First Union National Bank ("First Union"), with a branch location at 394 W. Berwick Street, Easton, Pennsylvania, was a financial institution required by federal law to file CTR reports. Defendant ORDER OF FLEAS maintained two accounts at the bank beginning on or about December 18, 2002 through on or about June 4, 2003.

5. Nazareth National Bank ("Nazareth Bank"), with a branch location at 101 S. Third Street, Easton, Pennsylvania, was a financial institution required by federal law to file CTR reports. Defendant ORDER OF FLEAS maintained two accounts at the bank beginning on or about December 19, 2002 through on or about June 4, 2003.

6. Between in or about January 1994 and on or about June 4, 2003, defendant ORDER OF FLEAS operated a gambling business as charged in Counts One and Two of this Information. The ORDER OF FLEAS deposited proceeds from the gambling business into its bank accounts at First Star, First Union, and Nazareth Bank.

## **THE CONSPIRACY**

7. Between in or about September 1995 and on or about May 30, 2003, in the Eastern District of Pennsylvania and elsewhere, defendant

### **THE ORDER OF FLEAS**

did conspire and agree with others known and unknown, to commit an offense against the United States, that is, to knowingly and for the purpose of evading the reporting requirements of Section 5313(a) of Title 31, United States Code, and the regulations promulgated thereunder, structure and assist in structuring, attempt to structure and assist in structuring, transactions, that is, the depositing of United States currency in amounts less than \$10,000, with one or more domestic financial institutions, and did so as part of a pattern of illegal activity involving more than \$100,000 in a 12-month period, in violation of Title 31, United States Code, Section 5324(a)(3).

## **MANNER AND MEANS OF THE CONSPIRACY**

It was part of the conspiracy that:

8. Defendant ORDER OF FLEAS maintained various bank accounts at multiple banks in the Easton area.

9. Defendant ORDER OF FLEAS deposited gambling proceeds into its bank accounts in amounts less than \$10,000.

10. Between in or about September 1995 and on or about May 30, 2003, defendant ORDER OF FLEAS structured the depositing of approximately \$7,380,000 in United States currency into its account at First Star to avoid the reporting requirements of financial institutions.

11. Between in or about December 2002 and on or about May 30, 2003, defendant ORDER OF FLEAS structured the depositing of approximately \$314,512 in United States currency into its accounts at First Union to avoid the reporting requirements of financial institutions.

12. Between in or about December 2002 and on or about May 30, 2003, defendant ORDER OF FLEAS structured the depositing of approximately \$331,330 in United States currency into



its accounts at Nazareth Bank to avoid the reporting requirements of financial institutions.

### **OVERT ACTS**

In furtherance of the conspiracy and to accomplish its object, the following overt acts, among others, were committed in the Eastern District of Pennsylvania and elsewhere:

1. During 1996, defendant ORDER OF FLEAS made 94 deposits of currency in amounts between \$8,000 and \$9,500 into its account at First Star.
2. During 1997, defendant ORDER OF FLEAS made 103 deposits of currency in amounts between \$9,000 and \$9,900 into its account at First Star.
3. During 1998, defendant ORDER OF FLEAS made 113 deposits of currency in amounts between \$9,000 and \$9,900 into its account at First Star.
4. During 1999, defendant ORDER OF FLEAS made 133 deposits of currency in the amount of \$9,800 into its account at First Star.
5. Between on or about January 1, 2000 and on or about March 15, 2000 and between on or about June 1, 2000 through on or about December 31, 2000, defendant ORDER OF FLEAS made 74 deposits of currency in the amount of \$9,800 into its account at First Star.
6. During 2001, defendant ORDER OF FLEAS made 91 deposits of currency in the amount of \$9,800 into its account at First Star.
7. During 2002, defendant ORDER OF FLEAS made 97 deposits of currency in the amount of \$9,800 into its account at First Star.
8. Between on or about December 18, 2002 and on or about May 28, 2003, defendant ORDER OF FLEAS made 46 structured deposits of currency in amounts less than \$10,000, totaling approximately \$314,512, into its accounts at First Union
9. Between December 19, 2002 and May 30, 2003, defendant ORDER OF FLEAS made 40 structured deposits of currency in amounts less than \$10,000, totaling approximately \$331,330, into its accounts at Nazareth Bank.

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

**COUNT FOUR**  
**(STRUCTURING FINANCIAL TRANSACTIONS)**

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

1. Paragraphs one through 6 of Count Three are realleged.
2. Between on or about December 18, 2002 and on or about December 31, 2002, at Easton, Pennsylvania, in the Eastern District of Pennsylvania, defendant

**THE ORDER OF FLEAS**

knowingly and for the purpose of evading the reporting requirements of Section 5313(a) of Title 31, United States Code, and the regulations promulgated thereunder, structured and assisted in structuring, and attempted to structure and assist in the structuring of, transactions, that is five deposits of \$9,800 in currency, with a domestic financial institution, that is, First Union National Bank, and did so as part of a pattern of illegal activity, involving more than \$100,000 in a 12-month period; these deposits being gambling proceeds from the operation of an illegal gambling business.

In violation of Title 31, United States Code, Sections 5324(a)(3) and (c)(2).

## **COUNT FIVE**

### **(CONSPIRACY TO DEFRAUD THE INTERNAL REVENUE SERVICE)**

#### **THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:**

At all times material to the Information:

1. Defendant THE ORDER OF FLEAS was a private men's social club located at 601-617 Reynolds Street, Easton, Pennsylvania.
2. Defendant ORDER OF FLEAS maintained a board of directors, a set of officers, and hired full-time and part-time employees.

#### **THE CONSPIRACY**

3. Between in or about January 1998 and on or about June 4, 2003, in the Eastern District of Pennsylvania and elsewhere, defendant

#### **THE ORDER OF FLEAS**

conspired and agreed with others known and unknown to defraud the United States by impeding, impairing, obstructing, and defeating the lawful functions of the Internal Revenue Service of the Department of the Treasury in the ascertainment, computation, assessment and collection of income taxes.

#### **MANNER AND MEANS OF THE CONSPIRACY**

It was part of the conspiracy that:

4. Defendant ORDER OF FLEAS paid income to directors, officers, and employees of ORDER OF FLEAS in a manner to evade the payment of employment tax by ORDER OF FLEAS and income taxes by the directors, officers, and employees to the United States.
5. Defendant ORDER OF FLEAS operated an illegal gambling business using video poker machines designed and manufactured as gambling devices.
6. Defendant ORDER OF FLEAS received proceeds from the illegal

gambling business and used portions of those funds to dispense income through cash payments to directors, officers, and employees.

7. Defendant ORDER OF FLEAS paid salary to part-time employees in the form of cash, totaling approximately \$343,000, without the filing of IRS W-2 forms and without reporting the payments for employment tax purposes.

8. Defendant ORDER OF FLEAS paid monthly salary bonuses and annual Christmas bonuses to directors, officers, and full-time employees in the form of cash, totaling approximately \$519,000, without the filing of IRS W-2 forms and without reporting the payments for employment tax purposes.

9. Defendant ORDER OF FLEAS board of directors Russell Hixon and James Durnin, Sr. received cash kickbacks, totaling approximately \$381,000, from video poker machine vendors.

10. Defendant ORDER OF FLEAS directors and officers split between themselves and employees \$10,000 in cash received as a kick back from video poker machine vendors each summer and Christmas seasons.

11. Defendant ORDER OF FLEAS directors, officers, and employees failed to report to the Internal Revenue Service the cash payments received in paragraphs 6 through 10 above.

## **OVERT ACTS**

In furtherance of the conspiracy and to accomplish its object, the following overt acts, among others, were committed in the Eastern District of Pennsylvania and elsewhere:

1. On a monthly basis between in or about January 1998 and in or about December 2002, defendant ORDER OF FLEAS paid cash bonuses to each of the directors, officers, and full time employees in the amount of \$225. On or about January 1, 2003, the board of directors increased their monthly cash bonus to \$525.
2. On a monthly basis between in or about January 1998 and in or about June 2003, defendant ORDER OF FLEAS paid cash bonuses to part-time employees.
3. In or about December 1998, defendant ORDER OF FLEAS paid Christmas cash bonuses to directors, officers, and employees totaling \$21,250.
4. In or about December 1999, defendant ORDER OF FLEAS paid Christmas cash bonuses to directors, officers, and employees totaling \$25,900.
5. On or about April 26, 2000, defendant ORDER OF FLEAS directors and officers split between themselves \$10,000 in cash of ORDER OF FLEAS funds.
6. In or about December 2000, defendant ORDER OF FLEAS paid Christmas cash bonuses to directors, officers, and employees totaling \$27,100.
7. In or about December 2001, defendant ORDER OF FLEAS paid Christmas cash bonuses to directors, officers, and employees totaling \$29,500.
8. In or about December 2002, defendant ORDER OF FLEAS paid Christmas cash bonuses to directors, officers, and employees totaling \$29,100.
9. Between in or about March 2000 through on or about June 4, 2003, defendant ORDER OF FLEAS paid cash salaries and bonuses to part-time employees totaling approximately \$343,000.
10. Between in or about January 1998 through on or about June 4, 2003, defendant ORDER OF FLEAS directors Russell Hixon and James Durnin, Sr. received

approximately \$381,000 in cash kickback payments from the vendors of the video poker machines.

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

## **COUNT SIX**

### **(CONSPIRACY TO COMMIT MONEY LAUNDERING)**

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

1. Defendants ANTHONY HANNI and HABOUK SHUMAR were engaged in the business of supplying and leasing video poker machines to social clubs located within Northampton and Lehigh Counties through their businesses M&M Amusement and Downtown Amusements, Inc. located in Easton, Pennsylvania.

2. Between on or about March 31, 1997 and on or about June 15, 2000, in the Eastern District of Pennsylvania and elsewhere, defendants

**ANTHONY HANNI and  
HABOUK SHUMAR  
a/k/a "Bootsie"**

did conspire and agree together and with others known and unknown, to knowingly conduct financial transactions, that is, the deposit and withdrawal of money, which involved the proceeds of a specified unlawful activity, that is, proceeds from an illegal gambling business conducted in violation of Title 18, United States Code, Section 1955, knowing that the property involved in the financial transactions, that is, currency of the United States and personal checks, represented the proceeds of an unlawful activity, and knowing that the transactions were designed in whole and in part to conceal and disguise the nature, source, ownership, and control of the proceeds of said specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

### **MANNER AND MEANS OF THE CONSPIRACY**

It was part of the conspiracy that:

3. Defendants ANTHONY HANNI and HABOUK SHUMAR supplied and leased video poker machines to social clubs in Lehigh and Northampton Counties which were

programmed for use as gambling devices, each containing a "knock down" button and meter, in violation of the laws of the Commonwealth of Pennsylvania.

4. Defendants ANTHONY HANNI and HABOUK SHUMAR hired a person known to the United States Attorney (herein referred to as "the bagman") to collect proceeds of unlawful gambling activity at social clubs paid as a fee to HANNI and SHUMAR for the leasing of video poker machines.

5. To conceal their involvement in the leasing of the video poker machines to the social clubs, defendants ANTHONY HANNI and HABOUK SHUMAR prepared and signed a written agreement with the bagman to give the appearance that the bagman, rather than the defendants, was the lessor of the video poker machines.

6. To conceal their involvement in the leasing of the video poker machines to the social clubs, defendants ANTHONY HANNI and HABOUK SHUMAR directed the bagman to open a bank account under his name into which to deposit the gambling proceeds.

7. Defendants ANTHONY HANNI and HABOUK SHUMAR directed the bagman to sign blank checks on his account and provide them to HANNI and SHUMAR.

8. Defendants ANTHONY HANNI and HABOUK SHUMAR withdrew money from the bank account opened by the bagman by cashing checks provided by the bagman after completing the missing entries on the checks.

### **OVERT ACTS**

In furtherance of the conspiracy and to accomplish its object, defendants ANTHONY HANNI and HABOUK SHUMAR, and others both known and unknown, committed and caused to be committed the following overt acts, among others, in the Eastern District of Pennsylvania and elsewhere:

1. In or about the fall of 1996, defendant HABOUK SHUMAR discussed with the bagman the hiring of the bagman to collect money gambling proceeds from social clubs which leased video poker machines from defendants ANTHONY HANNI and HABOUK



SHUMAR.

2. In or about the end of 1996, defendant HABOUK SHUMAR introduced the bagman to SHUMAR's contacts at social clubs from whom the bagman would receive gambling proceeds for defendants ANTHONY HANNI and SHUMAR.

3. On approximately a weekly basis, the bagman collected money from social clubs for defendants ANTHONY HANNI and HABOUK SHUMAR.

4. In or about March 1997, defendants ANTHONY HANNI and HABOUK SHUMAR directed the bagman to open a bank account into which to deposit the gambling proceeds that the bagman collected.

5. Between on or about March 31, 1997 and on or about June 15, 2000, the bagman deposited into his bank account money approximately \$2,662,256 collected from social clubs for defendants ANTHONY HANNI and HABOUK SHUMAR.

6. Between on or about September 28, 1998 and on or about June 15, 2000, defendants ANTHONY HANNI and HABOUK SHUMAR gave the bagman additional money collected by other persons from social clubs to be deposited into the bagman's bank account.

7. Between on or about March 31, 1997 and on or about June 15, 2000, the bagman provided a blank check signed by the bagman to defendant ANTHONY HANNI and a breakdown of the money collected from social clubs. In turn, defendants HANNI and HABOUK SHUMAR withdrew money from the bagman's account using the checks provided by the bagman.

All in violation of Title 18, United States Code, Section 1956(h).

**COUNT SEVEN**

**(MONEY LAUNDERING)**

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

1. Through their businesses M&M Amusement and Downtown Amusements, Inc. located in Easton, Pennsylvania, defendants ANTHONY HANNI and HABOUK SHUMAR supplied and leased video poker machines to social clubs in Lehigh and Northampton Counties which were programmed for use as gambling devices, each containing a "knock down" button and meter, in violation of the laws of the Commonwealth of Pennsylvania.

2. Defendants ANTHONY HANNI and HABOUK SHUMAR hired a person known to the United States Attorney (herein referred to as "the bagman") to collect proceeds of unlawful gambling activity at social clubs paid as a fee to HANNI and SHUMAR for the leasing of video poker machines.

3. To conceal their involvement in the leasing of the video poker machines to the social clubs, defendants ANTHONY HANNI and HABOUK SHUMAR directed the bagman to open a bank account under his name into which to deposit the gambling proceeds.

4. Between on or about April 13, 1999 and on or about April 20, 1999, the bagman deposited into his bank account at the Summit Bank, Bethlehem, Pennsylvania, approximately \$46,964 in gambling proceeds that he had collected for defendants ANTHONY HANNI and HABOUK SHUMAR.

5. On or about April 19, 1999, the bagman provided defendants ANTHONY HANNI and HABOUK SHUMAR with a blank check signed by the bagman.

5. On or about April 20, 1999, in the Eastern District of Pennsylvania,  
defendants

**ANTHONY HANNI and  
HABOUK SHUMAR  
a/k/a "Bootsie"**

did knowingly conduct, and aid, abet, induce, and procure the conducting of, a financial transaction, that is, the withdrawal of money from the Summit Bank, that is, approximately \$45,210, which involved the proceeds of a specified unlawful activity, that is, proceeds from an illegal gambling business conducted in violation of Title 18, United States Code, Section 1955, knowing that the property involved in the financial transaction, that is, currency of the United States, represented the proceeds of an unlawful activity, and knowing that the transaction was designed in whole and in part to conceal and disguise the nature, source, ownership, and control of the proceeds of said specified unlawful activity.

In violation of Title 18, United States Code, Section 1956(a)(1)(B)(i) and Section 2.

### **NOTICE OF FORFEITURE**

As a result of the violations of Title 31, United States Code, Sections 5324(a)(3) and 5324(c) and Title 18, United States Code, Sections 1955 and 371, as set forth in Counts One through Four of this Information, defendant

### **ORDER OF FLEAS**

shall forfeit to the United States, pursuant to Title 18, United States Code, Sections 982 and 1955(d), the following property:

1. \$54,615.26 that was seized from Nazareth National Bank account #9972074;
2. \$49,578.27 that was seized from Nazareth National Bank account #9971907;
3. \$19,077.13 that was seized from First Union (Wachovia) Bank account #2000011649908;
4. \$27,398.59 that was seized from First Union (Wachovia) Bank account #2000011649898;
5. \$198,331 in cash seized from 601-17 Reynolds Street, Easton on June 4, 2003; and
6. All money that is contained in investment accounts and mutual funds maintained through Investment Advisors and Consultants, Inc., including accounts JB 1001090 and 01000058266, valued as of October 14, 2003 at approximately \$184,757.74.

The foregoing property was involved in or traceable to the commission of violations of Title 31, United States Code, Sections 5324(a)(3) and 5324(c) and Title 18, United States Code, Sections 1955 and 371, as charged in this Information, or constitutes substitute assets pursuant to Title 18, United States Code, Sections 982 and 1955(d), and Title 28, United States Code, Section 2461.

### **NOTICE OF FORFEITURE**

As a result of the violation of Title 18, United States Code, Sections 371 and 1955 as set forth in Counts One and Two of this Information, defendant

**ANTHONY HANNI**

shall forfeit to the United States, pursuant to Title 18, United States Code, Section 1955(d), the following property:

1. the sum of five hundred thousand dollars (\$500,000).

The foregoing property was involved in or traceable to the commission of violations of Title 18 , United States Code, Sections 371 and 1955, as charged in this Information, or constitutes substitute assets pursuant to Title 18, United States Code, Section 1955(d) and Title 28, United States Code, Section 2461.

**NOTICE OF FORFEITURE**

As a result of the violation of Title 18, United States Code, Sections 371 and 1955 as set forth in Counts One and Two of this Information, defendant

**HABOUK SHUMAR**

shall forfeit to the United States, pursuant to Title 18, United States Code, Section 1955(d), the following property:

1. the sum of five hundred thousand dollars (\$500,000).

The foregoing property was involved in or traceable to the commission of violations of Title 18 , United States Code, Sections 371 and 1955, as charged in this Information, or constitutes substitute assets pursuant to Title 18, United States Code, Section 1955(d) and Title 28, United States Code, Section 2461.

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**PATRICK L. MEEHAN**  
**United States Attorney**