

**FILED**

UNITED STATES DISTRICT COURT  
ALBUQUERQUE, NEW MEXICO

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO

FEB 28 2012 *er*

**MATTHEW J. DYKMAN**

CLERK

UNITED STATES OF AMERICA

Plaintiff,

vs.

NEAL KASPER,  
BRADLEY G. CHRISTIANSEN,  
SARA CHRISTIANSEN,  
TIFFANY WHITE,  
RAMZI SNOBAR,  
YACOUB SNOBAR,  
MUSTAPHA AHMAD, and  
ALI AL ARIDHI,

Defendants.

) CRIMINAL NO: 12-413  
)  
) Count: 1: 18 U.S.C. § 1349 Wire Fraud  
) Conspiracy  
)  
) Counts 2-75: 18 U.S.C. § 1343 Wire  
) Fraud  
)  
) Count 76: 41 U.S.C. § 53: Kickback  
)  
) Count 77: 18 U.S.C. § 1956(h): Money  
) Laundering Conspiracy  
)  
) Counts 78-88: 18 U.S.C. § 1957: Money  
) Laundering: use of Criminal Proceeds  
)  
) Counts 89-91: 26 U.S.C. § 7201: Income  
) Tax Evasion

INDICTMENT

The Grand Jury charges:

At all times relevant to this Indictment:

INTRODUCTION

1. During the Iraqi war and continuing until at least the end of 2011, the United States funded numerous construction and rebuilding projects in Iraq.
2. United States reconstruction contracts were administered by Departments and Agencies of the United States including the United States Air Force Center for Engineering and the Environment (AFCEE) located in San Antonio, Texas.
3. Laguna Construction Company (LCC) with offices located on the Pueblo of Laguna and also in Albuquerque, New Mexico, San Antonio, Texas, also in Villas in Baghdad,

Iraq and Amman, Jordan, performed general contracting and heavy construction activities both in the United States and in Iraq; was a corporation chartered by the United States; and was owned exclusively by the Pueblo of Laguna, a Native American Indian Tribe. LCC was managed by a Board selected by the tribal counsel of the Pueblo of Laguna.

4. LCC was designated by the United States as a minority disadvantaged company due to its Pueblo ownership which provided LCC with contracting advantages over competitors.

5. LCC operated both as a Prime Contractor and subcontractor of the United States and received multiple contracts from agencies of the United States including AFCEE for wartime reconstruction projects located in both Iraq and Jordan.

The Defendants

6. **NEAL D. KASPER (KASPER)**, was the President of LCC and was in charge of all of LCC's construction operations including those involving wartime reconstruction efforts in Iraq and Jordan. KASPER was a legal resident in New Mexico and alternately resided in Amman, Jordan and Baghdad, Iraq.

7. **BRADLEY G. CHRISTIANSEN (B. CHRISTIANSEN)**, was the Executive Vice President and Chief Operating Officer of LCC for LCC's reconstruction efforts in Iraq. **B. CHRISTIANSEN** was a legal resident in Albuquerque, New Mexico and alternately resided in Baghdad, Iraq and Amman, Jordan.

8. **SARA CHRISTIANSEN (S. CHRISTIANSEN)**, was the wife of **B. CHRISTIANSEN**, and resided in Albuquerque, New Mexico.

9. **TIFFANY WHITE (WHITE)** was LCC's Contract Compliance Manager and was located at LCC's office in San Antonio, Texas.

10. **RAMZI IBRAHIM SNOBAR (R. SNOBAR)** resided in Jordan and was an owner of Ramzi & Yacoub Snobar (Snobar), a Jordanian construction company that received multiple reconstruction contracts from LCC.

11. **YACOUB ANDRAWES SNOBAR (Y. SNOBAR)** resided in Jordan, was the relative of **RAMZI SNOBAR**, and was also an owner of Snobar.

12. **MUSTAPHA FIESAL AHMAD (AHMAD)** resided in Lebanon and Iraq and was an owner of Mercury Development Company (Mercury), a Lebanese contractor that received multiple reconstruction contracts from LCC. **AHMAD** also worked for The New Millennium Company (New Millennium), an Iraqi contractor that, prior to Mercury's existence, received multiple reconstruction contracts from LCC.

13. **ALI ABDULMUHISIN NEAMAA AL ARIDHI (AL ARIDHI)** resided in Iraq and was an owner of Tigris River Company, an Iraqi contractor that received multiple reconstruction contracts from LCC.

#### Background

14. Alpine Contractors Inc. (Alpine) is a subchapter S corporation owned by defendant **KASPER** and was used only to receive kickbacks from LCC subcontractors in Iraq.

15. New Mexico Consolidated Construction (NMCC) is a New Mexico real estate investment company in which defendant **KASPER** was a 22.5% owner.

16. Kasper and Sons is a company located in Montana that is owned by defendant **KASPER** and members of his family.

17. BGC Consulting (BGC) is a New Mexico limited liability company owned by **B.CHRISTIANSEN** that was used only to receive kickbacks from LCC subcontractors in Iraq.

18. Southwest Cobra is a New Mexico company that is owned by defendant

**B. CHRISTIANSEN.**

19. Southwest Snake Works is a New Mexico company that is owned by defendant **B.**

**CHRISTIANSEN.**

20. RTR d/b/a BNU (pseudonyms) is a company which is located in Albuquerque, New Mexico, that performed automobile restoration and kit car assembly services for defendant

**B. CHRISTIANSEN.**

21. "F Company" (a pseudonym) was an Albuquerque, New Mexico, building contractor which provided home improvement services to the Albuquerque, New Mexico residence of defendants **S. CHRISTIANSEN** and **B. CHRISTIANSEN.**

22. During the years 2003 through 2009, LCC, as a Prime Contractor and subcontractor, administered over 350 million dollars of U.S. awarded Iraqi reconstruction contracts generally under a cost plus basis in which LCC received a percentage of the total contract award as compensation.

23. A mandate, imposed by the United States on Prime Contractors and subcontractors in their administration of Iraqi war-zone reconstruction contracts required, to the greatest extent possible, the award of subcontracts to foreign companies.

24. Prime Contractors and subcontractors such as LCC, in awarding and administering lower-tier subcontracts, were obligated to follow United States contract award practices including the requirements of: competitive bidding; independent cost or price analysis; documented justification for all sole-source contract awards; verification of services rendered; and verification of costs incurred.

25. Once LCC received a prime contract award, LCC was required to generate Request for Proposals (RFPs) and through that process solicit independent subcontract bids from foreign contractors to perform the necessary work.

26. All subcontractor bids were required to be independently prepared by the subcontractors and without collusion among the prime contractors, the subcontractors, the bidders, or LCC personnel.

27. All prime contractor (LCC) personnel involved in receiving or evaluating the subcontracts bids or involved in administering or supervising the awarded subcontracts are prohibited from accepting anything of value regardless of how it is described, that is for example: a gift, bribe or kickback, from, or on behalf of, the bidders.

28. Once bids are received, LCC is required to objectively evaluate the bids taking into consideration the qualifications and past performance of the foreign contractors and generally awards the contract to the lowest qualified bidder.

COUNT 1

(Title 18, U.S.C. §§ 1349 and 2)  
(Wire Fraud Conspiracy)

29. Paragraphs 1 through 28 are re-alleged and reincorporated as if fully set forth herein.

Purpose of the Wire Fraud Conspiracy

30. From in or about January 2004, through on or about February 18, 2009, in the District of New Mexico, and elsewhere, defendants

**NEAL D. KASPER,  
BRADLEY G. CHRISTIANSEN,**

**TIFFANY WHITE,  
RAMZI SNOBAR,  
YACOUB SNOBAR,  
MUSTAPHA AHMAD,  
and  
ALI AL ARIDHI**

and others known and unknown to the Grand Jury, did knowingly conspire, confederate and agree to defraud the United States by devising and intending to devise a scheme and artifice to defraud, by use of wire communications and wire transmissions, to obtain money and property, to wit: to unlawfully over-bill the United States by submitting materially false and fraudulent reimbursement vouchers to AFCEE and other agencies of the United States via wire transmissions to and through the United States Department of Defense (DOD), thereby causing overpayment to the subcontractors in order to generate excess funds for the subcontractors to allow Defendants **R. SNOBAR, Y. SNOBAR, AHMAD, AL ARIDHI**, and others known and unknown to the Grand Jury to offer and to pay kickbacks for the award of Iraqi reconstruction subcontracts to Defendants **KASPER, B. CHRISTIANSEN and WHITE** and others known and unknown to the Grand Jury. The Defendants named herein, Paragraph 30, did conspire, confederate and agree to complete the fraud by causing the use of wire transmissions of vouchers for Iraqi reconstruction projects from LCC in New Mexico in that they caused LCC vouchers to be presented to the AFCEE, and other agencies of the United States Department of Defense, knowing such vouchers to be false, fictitious, and fraudulent by materially overstating the cost of subcontractor mobilization by over five million dollars:

All in violation of Title 18, United States Code, Section 1349.

Manner and Means of the Conspiracy

31. Among the manner and means by which **KASPER, B. CHRISTIANSEN, WHITE, R. SNOBAR, Y. SNOBAR, AHMAD, AL ARIDHI** and others carried out the object and purpose of the conspiracy were the following:
- a. LCC would be awarded contracts by departments and agencies of the United States for Iraqi reconstruction projects;
  - b. **KASPER** and **B. CHRISTIANSEN** and others at LCC would prepare solicitations for Iraqi contractor bids on reconstruction contracts funded by the United States;
  - c. **WHITE**, would receive foreign subcontractor bids prepared by **R. SNOBAR, Y. SNOBAR, AHMAD, AL ARIDHI** and other contractors and would forward the confidential bids to **B. CHRISTIANSEN**;
  - d. **B. CHRISTIANSEN** would share the confidential bid information with favored contractors including **R. SNOBAR, Y. SNOBAR, AHMAD, AL ARIDHI**;
  - e. **B. CHRISTIANSEN** would direct the alteration of bids submitted by **R. SNOBAR, Y. SNOBAR, AHMAD, AL ARIDHI** and other favored contractors thereby allowing these companies to be the lowest qualified bidders on a rotating basis for specific contracts.
  - f. **B. CHRISTIANSEN** would eliminate competing bids from non-favored contractors by falsely representing that the contractors were incapable of meeting the contract demands;
  - g. **B. CHRISTIANSEN** and others would change contract specifications without providing the revised specifications to qualified contractors thereby

eliminating their opportunity to submit revised bids;

h. Bids submitted by **R. SNOBAR, Y. SNOBAR, AHMAD, AL ARIDHI** and other favored foreign subcontractors would materially overstate mobilization cost to be incurred for the construction project;

i. **KASPER** and **B. CHRISTIANSEN** would cause the contracts to be awarded by LCC to favored contractors including companies owned by **R. SNOBAR, Y. SNOBAR, AHMAD, AL ARIDHI** and others knowing that their bids would include false and inflated mobilization costs;

j. After LCC awarded the contract, the favored Iraqi contractors, including **R. SNOBAR, Y. SNOBAR, AHMAD, AL ARIDHI**, would incur little, if any, mobilization expense and thereby would cause the United States to be fraudulently overcharged;

k. **KASPER** and **B. CHRISTIANSEN** would approve the preferred subcontractors invoices and would cause the foreign contractors to be overpaid by the United States;

l. Soon after LCC awarded the contract, **KASPER** and **B. CHRISTIANSEN** would cause the immediate, up-front payment of a substantial portion of the contractors' inflated false mobilization expense by the United States; and

m. **KASPER** and **B. CHRISTIANSEN** would thereby cause the contractors including **R. SNOBAR, Y. SNOBAR, AHMAD, AL ARIDHI** to fraudulently receive excess funds from the United States.

Overt Acts in Furtherance of the Conspiracy

32. Beginning in or before January 2004 and continuing through at least



February 18, 2009, in Bernalillo County, in the District of New Mexico, and elsewhere, in furtherance of the conspiracy and to effect the purpose thereof, the defendants **NEAL D. KASPER, BRADLEY G. CHRISTIANSEN, TIFFANY WHITE, RAMZI SNOBAR, YACOUB SNOBAR, MUSTAPHA AHMAD, ALI AL ARIDHI**, and others committed the following overt acts, among others:

a. On or about June 1, 2004, on a project ultimately awarded to Company S, **B. CHRISTIANSEN** and others allowed Company S to alter a bid proposal on contract 2004-007-SUB02 by adding \$476,168 of mobilization expense on a job site where Company S was already mobilized and on site without requiring factual support for the expense.

b. On or about July 15, 2004, on a project ultimately awarded to Company S, **B. CHRISTIANSEN** and others awarded \$201,485 of mobilization expense on contract 2004-016-SUB01 by adding initially unrequested mobilization expense to the award and not requiring factual support.

c. In or about August of 2004, **B. CHRISTIANSEN** and others disqualified two lower bidders on contract 2004-011-SUB03 for not providing required technical information in order to award the contract to Company S as the lowest qualified bidder.

d. In or about March of 2005, **B. CHRISTIANSEN** and others assisted **AHMAD** and New Millennium in obtaining the award of contract 2005-009-012-SUB01 and subsequently awarded change orders without conducting open and fair competition and through the unjustified elimination of competitors.

e. In or about March of 2005, **B. CHRISTIANSEN** and others assisted Company S in obtaining an award for contract 2004-011-005-SUB21 without

competition by altering bid submissions to make Company S the lowest bidder.

f. In or about May of 2005, **B. CHRISTIANSEN** and others assisted Company H in obtaining an award for contract 2005-010-014-SUB01 without competition by assisting in Company H's bid submission and causing it to be the lowest bidder.

g. In or about October of 2005, **B. CHRISTIANSEN** and others assisted New Millennium in obtaining an award for contract 2005-020-017-SUB04 without competition by eliminating the lowest bidder without cause.

h. In or about December of 2005, **B. CHRISTIANSEN** and others assisted Mercury, Snobar and Company S in obtaining an award for contract 2005-038-020-SUB01; SUB02 and SUB03 without competition by having each company bid on all contracts for essentially the same service and rotating the awards so each company was awarded a contract.

i. In or about December of 2007, **B. CHRISTIANSEN** and others awarded three change orders under contract 2005-017-015-SUB05 allowing Mercury the opportunity to claim over \$500,000 of mobilization expenses that were not going to be incurred.

j. In or about August of 2006, Salinas and others shared LCC's internal Rough Order of Magnitude (ROM) price estimate for contract 2006-027-0008H-SUB01 with Mercury which was used by Mercury to create its winning bid. Salinas was an LCC employee at times and a contractor at times relevant herein.

k. In or about August of 2007, LCC employees accepted a bid from Snobar on contract 2006-027-0008H-SUB03 even though it was two weeks past the bid closing date and awarded the contract to Snobar.

l. In or about October of 2007, **B. CHRISTIANSEN** and others

increased the amount of mobilization expense awarded to Mercury from \$12,000 to \$812,000 on contract 2007-017-0014H-SUB01.

m. Paragraphs 35, 36 and 37 are alleged as further overt acts in furtherance of the wire fraud conspiracy as if fully restated herein.

All in violation of Title 18, United States Code, Section 1349.

COUNT 2 through 75  
(Title 18, U.S.C. §§ 1343 and 2)  
(Wire Fraud)

33. Paragraphs 1 through 28 and 30 through 32 are re-alleged and reincorporated as if fully set forth herein.

Purpose of the Scheme

34. From in or about January 2004, through on or about February 18, 2009, in the District of New Mexico, and elsewhere, defendants

**NEAL D. KASPER,  
BRADLEY G. CHRISTIANSEN,  
TIFFANY WHITE,  
RAMZI SNOBAR,  
YACOUB SNOBAR,  
MUSTAPHA AHMAD,  
and  
ALI AL ARIDHI**

and others known and unknown to the Grand Jury, devised and intended to devise a scheme and artifice to defraud by use of wire communications and transmissions to obtain money and property, to wit: to unlawfully over-bill the United States by submitting materially false and fraudulent reimbursement vouchers to AFCEE and other agencies of the United States via wire transmissions to and through the United States Department of Defense, thereby causing

overpayment to the subcontractors in order to generate excess funds for the subcontractors to allow defendants **AHMAD, R. SNOBAR, Y. SNOBAR, AHMAD, AL ARIDHI**, and others known and unknown to the Grand Jury to offer and to pay kickbacks for the award of Iraqi reconstruction subcontracts to defendants **KASPER, B. CHRISTIANSEN and WHITE** and others known and unknown to the Grand Jury by means of materially false and fraudulent pretenses, representations, promises and omissions as well as by intentional concealment of material facts, and for the purpose thereof, the Defendants listed herein, paragraph 34 knowingly and wilfully engaged in the acts as further set forth herein.

The Scheme and Artifice to Defraud

35. The scheme and artifice to defraud by which defendants **KASPER, B. CHRISTIANSEN, WHITE, R. SNOBAR, Y. SNOBAR, AHMAD, AL ARIDHI** and others carried out the object and purpose of the scheme were the following:

a. After LCC awarded the contract, the favored Iraqi contractors, including **R. SNOBAR, Y. SNOBAR, AHMAD, AL ARIDHI**, would incur little, if any, mobilization expense and thereby would cause the United States to be fraudulently overcharged;

b. **KASPER** and **B. CHRISTIANSEN** and others would approve the preferred subcontractors invoices and would cause the LCC in New Mexico to submit false invoices to Agencies and Departments of the United States via wire transmissions.

c. Upon receipt of the false claims, agencies and Departments of the United States would pay the claim to LCC in New Mexico via Wire Transfer.

d.. LCC would then overpay the foreign contractors from funds received from the United States;

e. Soon after LCC awarded the contract, **KASPER** and **B.**

**CHRISTIANSEN** would cause the immediate, up-front payment of a substantial portion of the contractors' inflated false mobilization expense by the United States; and

o. **KASPER** and **B. CHRISTIANSEN** would thereby cause the contractors including **R. SNOBAR, Y. SNOBAR, AHMAD, AL ARIDHI** to fraudulently receive excess funds from the United States.

Execution of the Scheme

36. Beginning in or before January 2004 and continuing through at least February 18, 2009, in Bernalillo County, in the District of New Mexico, and elsewhere, in furtherance of the scheme and to effect the purpose thereof, the defendants **KASPER, B. CHRISTIANSEN, WHITE, R. SNOBAR, Y. SNOBAR, AHMAD, AL ARIDHI**, and others committed the following acts, among others:

a. The acts alleged as Counts 2 through 75 are alleged as further acts in furtherance of and in the execution of the wire fraud scheme as if fully restated herein.

b. **R. SNOBAR, Y. SNOBAR, AHMAD, AL ARIDHI** and others would offer kickbacks to LCC personnel for the award of Iraqi reconstruction contracts;

c. **KASPER**, and **B. CHRISTIANSEN** and others would fraudulently eliminate "for cause" the bid submissions of foreign subcontractors who were unwilling to pay kickbacks for the award of reconstruction contracts;

d. **R. SNOBAR, Y. SNOBAR, AHMAD, AL ARIDHI**, and others would falsely overstate actual expenditures to be incurred including mobilization costs on subcontracts in order to obtain excess funds to pay kickbacks;

e. **KASPER, B. CHRISTIANSEN**, and others would approve for payment foreign subcontractors invoices which falsely overcharged the United States for costs not incurred;

f. **R. SNOBAR, Y. SNOBAR, AHMAD, AL ARIDHI**, and others would pay kickbacks in the form of the wire transfer of funds and the delivery of property to **KASPER, B. CHRISTIANSEN, WHITE**, and others in return for the award of LCC subcontracts; and

g. **KASPER, B. CHRISTIANSEN, WHITE** and others would receive kickbacks many in the form of wire transfers from Iraqi subcontractors in return for the award of Iraqi reconstruction contracts funded by the United States.

Acts in Furtherance of the Wire Fraud

37. Beginning in or before January 2004 and continuing through at least February 18, 2009 in Bernalillo County, in the District of New Mexico, and elsewhere, in furtherance of the wire fraud scheme and to execute said scheme of, the defendants **NEAL D. KASPER, BRADLEY G. CHRISTIANSEN, TIFFANY WHITE, RAMZI SNOBAR, YACOUB SNOBAR, MUSTAPHA AHMAD, ALI AL ARIDHI** and others committed the following acts, among others:

a. On or about the following dates, **R. SNOBAR** and **Y. SNOBAR** caused Snobar to wire-transfer the following kickbacks from Bank Audi bank in Jordan to **WHITE's** Bank of America Account # 4591 in San Antonio, Texas.

<u>Date</u>	<u>Amount</u>
September 18, 2006	\$8,972

September 22, 2006	\$8,972
September 27, 2006	\$8,972
October 17, 2006	\$8,972
October 20, 2006	\$8,972
December 19, 2006	\$8,972
August 31, 2007	\$8,480
March 20, 2008	\$4,985
May 23, 2008	\$8,880
June 20, 2008	\$5,180
July 10, 2008	\$5,580
August 6, 2008	\$5,680
September 2, 2008	\$5,780
September 3, 2008	\$4,285
October 9, 2008	\$5,272
October 27, 2008	\$5,072
February 17, 2009	\$3,885
Total	\$116,911

b. On or about the following dates, **R. SNOBAR** and **Y. SNOBAR** caused Snobar to wire-transfer the following kickbacks from Bank Audi in Jordan to Clair Wright's Umpqua Bank Account # 5987 in California for the benefit of **WHITE**.

<u>Date</u>	<u>Amount</u>
December 4, 2008	\$7,472
December 4, 2008	\$7,472
December 8, 2008	\$4,972
Total	\$19,916

c. On or about April 28, 2006, defendant **AHMAD** caused the delivery of a 2006 Porsche Cayman valued at \$68,275 to Albuquerque, New Mexico, as a kickback from Mercury Development Company to and for the benefit of **B. CHRISTIANSEN** for the award of Iraqi reconstruction subcontracts.

d. On or about the dates indicated below, the following demand for funds in the identified amounts were submitted by wire transmission to Agencies and Departments of the United States initiating from within the State of New Mexico and terminating at a location outside of the State of New Mexico.

e. In Counts Two through Eleven **NEAL D. KASPER, BRADLEY G. CHRISTIANSEN, TIFFANY WHITE, RAMZI SNOBAR, YACOUB SNOBAR, MUSTAPHA AHMAD, ALI AL ARIDHI** and others known and unknown to the grand jury, as part of the scheme and artifice to defraud did wire and cause to be wired the following documents and claims to be delivered to the Department of Defense and other agencies of the United States the following:

Count	Claim Date	Subcontract #	Subcontractor	Approximate Claim(s) Amount	Approximate False Claim Amount
2	5/02/07	2005-017-015-SUB05	Mercury Development	\$2,031,642	\$110,000
3	10/22/07	2005-017-015-SUB05	Mercury Development	\$6,097,137	\$110,000
4	4/02/07	2006-027-0008H-SUB01	Mercury Development	\$557,575	\$51,000
5	2/28/07	2006-029-0009H-	Mercury Development	\$1,261,349	\$190,000



		SUB01			
6	5/01/07	2006-029-0009H-SUB01	Mercury Development	\$2,498,331	\$190,000
7	8/14/07	2005-017-015-SUB07	Aridh Al-Sahil	\$2,594,552	\$100,000
8	1/18/08	2007-017-0014H-SUB01	Mercury Development	\$438,946	\$324,800
9	3/18/08	2007-017-0014H-SUB01	Mercury Development	\$2,741,247	\$324,800
10	6/30/08	2007-017-0014H-SUB01	Mercury Development	\$2,142,179	\$146,160
11	12/19/07	2007-022-0015H-SUB01	Snobar	\$5,669,886	\$580,000
				Total	\$2,126,760

f. On or about the dates indicated below, the following wire transfer of funds in the identified amounts were submitted and caused to be submitted and accepted and solicited by the named defendants. The wire transmission initiating from a location outside of the State of New Mexico and terminated and received in the State of New Mexico. In Counts Twelve through Thirty-nine **BRADLEY G. CHRISTIANSEN, RAMZI SNOBAR, and YACOUB SNOBAR**, and others known and unknown to the grand jury, as part of the scheme and artifice to defraud did wire and cause to be wired the following documents and funds:

Count	Date	Defendants	Wired from	Received By	Amount
12	4/10/08	B. CHRISTIANSEN	Snobar	BGC Consulting	\$7,980

		R. SNOBAR Y. SNOBAR			
13	4/23/08	B. CHRISTIANSEN R. SNOBAR Y. SNOBAR	Snobar	BGC Consulting	\$7,980
14	5/14/08	B. CHRISTIANSEN R. SNOBAR Y. SNOBAR	Snobar	BGC Consulting	\$11,980
15	5/27/08	B. CHRISTIANSEN R. SNOBAR Y. SNOBAR	Snobar	BGC Consulting	\$11,980
16	6/05/08	B. CHRISTIANSEN R. SNOBAR Y. SNOBAR	Snobar	BGC Consulting	\$11,972
17	6/25/08	B. CHRISTIANSEN R. SNOBAR Y. SNOBAR	Snobar	BGC Consulting	\$6,980
18	6/30/08	B. CHRISTIANSEN R. SNOBAR Y. SNOBAR	Snobar	BGC Consulting	\$5,980
19	7/09/08	B. CHRISTIANSEN R. SNOBAR Y. SNOBAR	Snobar	BGC Consulting	\$7,980
20	7/21/08	B. CHRISTIANSEN R. SNOBAR Y. SNOBAR	Snobar	BGC Consulting	\$8,480
21	7/23/08	B. CHRISTIANSEN R. SNOBAR Y. SNOBAR	Snobar	BGC Consulting	\$8,480
22	8/06/08	B. CHRISTIANSEN R. SNOBAR Y. SNOBAR	Snobar	BGC Consulting	\$7,980
23	8/29/08	B. CHRISTIANSEN R. SNOBAR Y. SNOBAR	Snobar	BGC Consulting	\$7,980

				Total	\$105,752
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Count	Date	Defendants	Wired From	Received By	Amount
24	4/10/07	B. CHRISTIANSEN R. SNOBAR Y. SNOBAR	Snobar	F Company f/b/o B. Christiansen	\$8,980
25	4/13/07	B. CHRISTIANSEN R. SNOBAR Y. SNOBAR	Snobar	F Company f/b/o B. Christiansen	\$7,980
26	4/18/07	B. CHRISTIANSEN R. SNOBAR Y. SNOBAR	Snobar	F Company f/b/o B. Christiansen	\$8,480
27	4/25/07	B. CHRISTIANSEN R. SNOBAR Y. SNOBAR	Snobar	F Company f/b/o B. Christiansen	\$8,980
28	5/02/07	B. CHRISTIANSEN R. SNOBAR Y. SNOBAR	Snobar	F Company f/b/o B. Christiansen	\$7,980
29	6/18/07	B. CHRISTIANSEN R. SNOBAR Y. SNOBAR	Snobar	F Company f/b/o B. Christiansen	\$8,972
30	6/26/07	B. CHRISTIANSEN R. SNOBAR Y. SNOBAR	Snobar	F Company f/b/o B. Christiansen	\$7,972
31	8/30/07	B. CHRISTIANSEN R. SNOBAR Y. SNOBAR	Snobar	F Company f/b/o B. Christiansen	\$7,980
32	9/04/07	B. CHRISTIANSEN R. SNOBAR Y. SNOBAR	Snobar	F Company f/b/o B. Christiansen	\$5,980
				Total	\$73,304

Count	Date	Defendants	Wired From	Received By	Amount
33	3/26/08	B. CHRISTIANSEN R. SNOBAR Y. SNOBAR	Snobar	RTR f/b/o B. Christiansen	\$7,927
34	4/02/08	B. CHRISTIANSEN R. SNOBAR Y. SNOBAR	Snobar	RTR f/b/o B. Christiansen	\$7,972
35	4/04/08	B. CHRISTIANSEN R. SNOBAR Y. SNOBAR	Snobar	RTR f/b/o B. Christiansen	\$8,980
36	4/14/08	B. CHRISTIANSEN R. SNOBAR Y. SNOBAR	Snobar	RTR f/b/o B. Christiansen	\$7,980
37	4/23/08	B. CHRISTIANSEN R. SNOBAR Y. SNOBAR	Snobar	RTR f/b/o B. Christiansen	\$7,980
				Total	\$40,839

Count	Date	Defendants	Wired From	Received By	Amount
38	6/13/08	B. CHRISTIANSEN R. SNOBAR Y. SNOBAR	Snobar	BNU f/b/o B. Christiansen	\$7,980
39	8/06/08	B. CHRISTIANSEN R. SNOBAR Y. SNOBAR	Snobar	BNU f/b/o B. Christiansen	\$7,980
				Total	\$15,960

g. On or about the dates indicated below, the following wire transfer of funds in the identified amounts were submitted and caused to be submitted and accepted and solicited by the named defendants. The wire transmission initiating from a location outside of the State of New Mexico and terminated and received in the State of New Mexico. In Counts Forty through

Seventy-five **NEAL KASPER, RAMZI SNOBAR, and YACOUB SNOBAR**, and others

known and unknown to the grand jury, as part of the scheme and artifice to defraud did wire and

cause to be wired the following documents and funds:

Count	Date	Defendants	Wired From	Received By	Amount
40	7/26/07	KASPER R. SNOBAR Y. SNOBAR	Snobar	NMCC	\$8,472
41	7/30/07	KASPER R. SNOBAR Y. SNOBAR	Snobar	NMCC	\$8,480
42	8/30/07	KASPER R. SNOBAR Y. SNOBAR	Snobar	NMCC	\$8,480
43	10/03/07	KASPER R. SNOBAR Y. SNOBAR	Snobar	NMCC	\$8,472
44	11/30/07	KASPER R. SNOBAR Y. SNOBAR	Snobar	NMCC	\$6,972
45	12/05/07	KASPER R. SNOBAR Y. SNOBAR	Snobar	NMCC	\$6,980
46	2/11/08	KASPER R. SNOBAR Y. SNOBAR	Snobar	NMCC	\$8,480
47	2/14/08	KASPER R. SNOBAR Y. SNOBAR	Snobar	NMCC	\$8,472
48	3/17/08	KASPER R. SNOBAR Y. SNOBAR	Snobar	NMCC	\$8,480
49	4/17/08	KASPER R. SNOBAR	Snobar	NMCC	\$8,480

		Y. SNOBAR			
50	5/05/08	KASPER R. SNOBAR Y. SNOBAR	Snobar	NMCC	\$8,480
				Total	\$90,248

Count	Date	Defendants	Wired From	Received By	Amount
51	11/07/07	KASPER R. SNOBAR Y. SNOBAR	Snobar	Wells Fargo Personal Bank Acct. # 1683 of Kasper	\$8,480
52	4/25/07	KASPER R. SNOBAR Y. SNOBAR	Snobar	Alpine	\$9,180
53	5/16/07	KASPER R. SNOBAR Y. SNOBAR	Snobar	Alpine	\$8,980
54	8/30/07	KASPER R. SNOBAR Y. SNOBAR	Snobar	Alpine	\$8,480
55	11/05/07	KASPER R. SNOBAR Y. SNOBAR	Snobar	Alpine	\$8,480
56	3/14/08	KASPER R. SNOBAR Y. SNOBAR	Snobar	Alpine	\$8,480
57	4/28/08	KASPER R. SNOBAR Y. SNOBAR	Snobar	Alpine	\$8,480
58	4/30/08	KASPER R. SNOBAR Y. SNOBAR	Snobar	Alpine	\$8,480
59	5/23/08	KASPER	Snobar	Alpine	\$8,280

		R. SNOBAR Y. SNOBAR			
60	5/29/08	KASPER R. SNOBAR Y. SNOBAR	Snobar	Alpine	\$7,980
61	6/20/08	KASPER R. SNOBAR Y. SNOBAR	Snobar	Alpine	\$9,080
62	7/10/08	KASPER R. SNOBAR Y. SNOBAR	Snobar	Alpine	\$8,780
63	8/06/08	KASPER R. SNOBAR Y. SNOBAR	Snobar	Alpine	\$8,880
64	8/20/08	KASPER R. SNOBAR Y. SNOBAR	Snobar	Alpine	\$8,680
65	8/25/08	KASPER R. SNOBAR Y. SNOBAR	Snobar	Alpine	\$8,280
66	9/11/08	KASPER R. SNOBAR Y. SNOBAR	Snobar	Alpine	\$8,680
67	9/15/08	KASPER R. SNOBAR Y. SNOBAR	Snobar	Alpine	\$8,280
68	9/24/08	KASPER R. SNOBAR Y. SNOBAR	Snobar	Alpine	\$8,872
69	10/06/08	KASPER R. SNOBAR Y. SNOBAR	Snobar	Alpine	\$8,572
70	10/09/08	KASPER R. SNOBAR	Snobar	Alpine	\$8,572

		Y. SNOBAR			
71	10/14/08	KASPER R. SNOBAR Y. SNOBAR	Snobar	Alpine	\$8,072
72	10/27/08	KASPER R. SNOBAR Y. SNOBAR	Snobar	Alpine	\$8,872
73	10/29/08	KASPER R. SNOBAR Y. SNOBAR	Snobar	Alpine	\$6,972
74	11/24/08	KASPER R. SNOBAR Y. SNOBAR	Snobar	Alpine	\$7,972
75	11/25/08	KASPER R. SNOBAR Y. SNOBAR	Snobar	Alpine	\$8,972
				Total	\$204,356

Counts 2-75 all in violation of Title, United States Code, Section 1343.

COUNT 76  
(41 U.S.C. §§ 53 and 2)  
(Illegal Kickbacks)

38. On or about January 28, 2008 in Bernalillo County, in the District of New Mexico, and elsewhere, for the purposes of soliciting, receiving, offering and paying kickbacks and attempting to do so, the defendants,

**BRADLEY G. CHRISTIANSEN**  
**and**  
**MUSTAPHA AHMAD,**

solicited, offered, paid and received the delivery of a 1967 Ford Shelby GT500E valued at



\$290,000 as a kickback in return for the award or Iraqi reconstruction contracts all in violation of Title 41, United States Code, Section 53 and 2:

COUNT 77  
(18 U.S.C. § 1956(h))  
(Money Laundering Conspiracy)

39. Paragraphs 1 through 28 and Paragraphs 31-32 and 35-39 of this Indictment are hereby realleged and incorporated by reference as if fully set forth herein.

40. From in or about January 2004, through in or about February 18, 2009, in Bernalillo County, in the District of New Mexico, and elsewhere, for the purposes of executing the money laundering conspiracy and attempting to do so, the defendants,

**NEAL D. KASPER,**  
**BRADLEY G. CHRISTIANSEN,**  
**SARA CHRISTIANSEN,**  
**and**  
**TIFFANY WHITE**

and others known and unknown to the Grand Jury, did unlawfully, willfully and knowingly combine, conspire, confederate and agree together and with each other, and with others known and unknown to the Grand Jury, to commit certain offenses under Title 18, United States Code, Section 1957, by engaging and attempting to engage in monetary transactions by, through, or to a financial institution, affecting interstate or foreign commerce, in criminally derived property of a value greater than \$10,000, knowing that the property involved in the financial transaction represented the proceeds of some form of unlawful activity, in violation of 18 U.S.C. § 1957.

Manner and Means Used in the Money Laundering Conspiracy

41. Among the manner and means by which **KASPER, B. CHRISTIANSEN,**

**S. CHRISTIANSEN**, and **WHITE** and others carried out the conspiracy were the following:

a. Paragraph 31 describing the manner and means of the conspiracy charged in Count One and Paragraph 35 describing the scheme and artifice to defraud charged in counts 2-75 of this Indictment are re-alleged and reincorporated as if fully set forth herein as part of the manner and means of the illegal money laundering conspiracy charged in this count.

b. **KASPER, B. CHRISTIANSEN, S. CHRISTIANSEN, WHITE** and others would cause the kickbacks paid by foreign subcontractors to be paid via wire transfers to accounts in the names of the defendants' relatives and received by the defendants;

c. **KASPER, B. CHRISTIANSEN, S. CHRISTIANSEN, WHITE** and others would cause the kickbacks paid by foreign subcontractors to be paid via wire transfers to accounts in the names of the businesses owned by the defendants;

d. **KASPER, B. CHRISTIANSEN, S. CHRISTIANSEN, WHITE** and others would cause the kickbacks paid by foreign subcontractors to be paid via wire transfers to unrelated businesses on behalf of the defendants;

e. **KASPER, B. CHRISTIANSEN, S. CHRISTIANSEN, WHITE** and others would cause the foreign subcontractors to provide personal property including automobiles as kickbacks;

f. **KASPER, B. CHRISTIANSEN, S. CHRISTIANSEN, WHITE** and others would cause the kickbacks paid by foreign subcontractors to be paid in currency;

g. **KASPER, B. CHRISTIANSEN, S. CHRISTIANSEN**, and **WHITE** and others would knowingly spend in excess of \$10,000 of the criminal derived

proceeds received from kickbacks paid by foreign subcontractors to acquire goods and to remodel residential real property.

Overt Acts in Furtherance of the Conspiracy

42. Beginning in or before January 2004 and continuing through at least February 18, 2009 in Bernalillo County, in the District of New Mexico, and elsewhere, in furtherance of the money laundering conspiracy and to effect the purpose thereof, the defendants **NEAL D. KASPER, BRADLEY G. CHRISTIANSEN, SARA CHRISTIANSEN, TIFFANY WHITE**, and others committed the following overt acts, among others involving the knowing transfer of criminal proceeds in excess of \$10,000:

- a. On or about October 11, 2006, **WHITE** transferred \$16,800 from BOA account 7601 to BOA account 4591.
- b. On or about October 13, 2006, **WHITE** debited BOA account 4591 for \$15,000 for the purchase of a motorcycle.
- c. On or about October 24, 2006, **WHITE** made an electronic funds transfer from BOA account 4591 for \$10,765.08 to pay a credit card bill of defendant **KASPER**.
- d. On or about December 28, 2006, **WHITE** purchased a cashier's check for \$11,900 from BOA account 4591.
- e. On or about January 2, 2008, **WHITE** purchased a cashier's check for \$14,654.95 from BOA account 7601 utilized to purchase a 2004 Chrysler Crossfire.
- f. On or about November 2, 2006, **S. CHRISTIANSEN** and **B. CHRISTIANSEN** delivered or had delivered, cash in the sum of \$ 50,000.00 to F Company for

home renovations.

g. On or about December 14, 2006 **S. CHRISTIANSEN** and **B. CHRISTIANSEN** delivered or had delivered, cash in the sum of \$20,000.00 to F Company for home renovations.

h. On or about January 26, 2007 **S. CHRISTIANSEN** and **B. CHRISTIANSEN** delivered cash in the sum of \$30,000.00 to F Company for home renovations.

i. On or about February 14, 2007 **S. CHRISTIANSEN** and **B. CHRISTIANSEN** delivered cash in the sum of \$80,000.00 to F Company for home renovations.

j. Counts 78 through 89 are alleged as further overt acts in furtherance of the money laundering conspiracy as if fully restated herein.

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

COUNTS 78 to 88  
(18 U.S.C. §§ 1957 and 2)  
(Money Laundering: Engaging in Monetary Transactions Greater than \$10,000 in Property  
Derived from Specified Unlawful Activity)

43. Paragraphs 1 through 28 of the Introduction; Paragraphs 31 and 32 of Count 1; and Paragraph 35 and of Counts 2-75 of this Indictment are hereby realleged and incorporated by reference as if fully set forth herein.

44. On or about the dates set forth below, in Bernalillo County, in the District of New Mexico, and elsewhere,

**NEAL D. KASPER,  
BRADLEY G. CHRISTIANSEN,  
TIFFANY WHITE  
and  
SARA CHRISTIANSEN**

did knowingly engage and attempt to engage in monetary transactions by through or to a financial institution, affecting interstate or foreign commerce, in criminally derived property of a value greater than \$10,000, that is the following transfers of funds for the defendant's personal benefit, such property having been derived from a specified unlawful activity, that is, defrauding the United States through the submission of false claims and the receipt of illegal kickbacks as described below:

Count	Transaction	Date	Amount
78	Cash Payment by <b>S. CHRISTIANSEN</b> and <b>B. CHRISTIANSEN</b> to F Company for Home Renovations	03/12/2007	\$30,000
79	Cash Payment by <b>S. CHRISTIANSEN</b> and <b>B. CHRISTIANSEN</b> to F Company for Home Renovations	04/06/2007	\$20,000
80	Cash Payment by <b>S. CHRISTIANSEN</b> and <b>B. CHRISTIANSEN</b> to F Company for Home Renovations	04/27/2007	\$20,000
81	Cash Payment by <b>S. CHRISTIANSEN</b> and <b>B. CHRISTIANSEN</b> to F Company for Home Renovations	05/16/2007	\$49,500
82	Cash Payment by <b>S. CHRISTIANSEN</b> and <b>B. CHRISTIANSEN</b> to F Company for Home Renovations	05/23/2007	\$22,000
		Total	\$141,500

Count	Transaction	Date	Amount
83	Transfer from <b>KASPER's</b> Alpine Wells Fargo account 8375 for the purchase of farm equipment	07/23/2008	\$18,000

Count	Transaction	Date	Amount
84	Transfer from <b>KASPER's</b> Alpine Wells Fargo account 8375 for the purchase of two trucks	09/02/2008	\$16,740
85	Purchase of three cashier's checks by withdrawing funds from <b>KASPER's</b> Alpine Wells Fargo account 8375	09/12/2008	\$28,682.55
86	Check drawn on <b>KASPER's</b> Alpine Wells Fargo account 8375 made payable to Kasper & Sons LLC owned by <b>KASPER</b>	10/06/2008	\$15,000
87	Check drawn on <b>KASPER's</b> Alpine Wells Fargo account 8375 made payable to Kasper & Sons LLC owned by <b>KASPER</b>	10/23/2008	\$25,284
88	Check drawn on <b>KASPER's</b> Alpine Wells Fargo account 8375 made payable to Kasper & Sons LLC	05/12/2009	\$11,000
		Total	\$114,706.55

All in violation of Title 18, United States Code, Sections 1957 and 2.

COUNT 89  
(26 U.S.C. § 7201 and 2)  
(Federal Income Tax Evasion for the Tax Year 2006)

45. That on or about the 15<sup>th</sup> day of October, 2007, in the District of New Mexico, **BRADLEY G. CHRISTIANSEN**, a resident of Albuquerque, New Mexico, who during the calendar year 2006 was married, did willfully attempt to evade and defeat a large part of the income tax due and owing by him and his spouse to the United States of America for the calendar year 2006, by preparing and causing to be prepared, and by electronically signing and causing to be electronically signed, a false and fraudulent joint U.S. Individual Income Tax Return, Form 1040, on behalf of himself and his spouse, which was filed with the Internal Revenue Service. In that return, it was stated that their joint taxable income for the calendar year 2006 was the sum of

\$245,813 and that the amount of tax due and owing thereon was the sum of \$73,554. In fact, as he then and there knew, their joint taxable income for the calendar year was the sum of \$320,734, upon which joint taxable income there was owing to the United States of America an income tax of \$99,353.

All in violation of Title 26, United States Code, Section 7201.

COUNT 90  
(26 U.S.C. § 7201 and 2)  
(Federal Income Tax Evasion for the Tax Year 2007)

46. That on or about the 25<sup>th</sup> day of June, 2008, in the District of New Mexico, **BRADLEY G. CHRISTIANSEN**, a resident of Albuquerque, New Mexico, who during the calendar year 2007 was married, did willfully attempt to evade and defeat a large part of the income tax due and owing by him and his spouse to the United States of America for the calendar year 2007, by preparing and causing to be prepared, and by electronically signing and causing to be electronically signed, a false and fraudulent joint U.S. Individual Income Tax Return, Form 1040, on behalf of himself and his spouse, which was filed with the Internal Revenue Service. In that return, it was stated that their joint taxable income for the calendar year 2007 was the sum of \$245,692 and that the amount of tax due and owing thereon was the sum of \$74,280. In fact, as he then and there knew, their joint taxable income for the calendar year was the sum of \$326,358, upon which joint taxable income there was owing to the United States of America an income tax of \$102,147.

All in violation of Title 26, United States Code, Section 7201.

COUNT 91  
(26 U.S.C. § 7201 and 2)  
(Federal Income Tax Evasion for the Tax Year 2008)

47. That on or about the 14<sup>th</sup> day of October, 2009, in the District of New Mexico, **BRADLEY G. CHRISTIANSEN**, a resident of Albuquerque, New Mexico, who during the calendar year 2008 was married, did willfully attempt to evade and defeat a large part of the income tax due and owing by him and his spouse to the United States of America for the calendar year 2008, by preparing and causing to be prepared, and by electronically signing and causing to be electronically signed, a false and fraudulent joint U.S. Individual Income Tax Return, Form 1040, on behalf of himself and his spouse, which was filed with the Internal Revenue Service. In that return, it was stated that their joint taxable income for the calendar year 2008 was the sum of \$265,390 and that the amount of tax due and owing thereon was the sum of \$71,217. In fact, as he then and there knew, their joint taxable income for the calendar year was the sum of \$618,109, upon which joint taxable income there was owing to the United States of America an income tax of \$187,913.

All in violation of Title 26, United States Code, Section 7201.

FORFEITURE ALLEGATION

Paragraphs 1 through 47 of this Indictment are incorporated as part of this section of the indictment as if fully re-alleged herein for the purpose of alleging forfeiture to the United States pursuant to 18 U.S.C. § 982(a)(1).



Upon conviction of any offense in violation of 18 U.S.C. § 1956 or 18 U.S.C. § 1957, the defendants, **NEAL D. KASPER, BRADLEY G. CHRISTIANSEN, SARA CHRISTIANSEN, AND TIFFANY WHITE** shall forfeit to the United States pursuant to 18 U.S.C. § 982(a)(1) any property, real or personal, involved in such offense, or any property traceable to such property.

The property to be forfeited to the United States includes but is not limited to the following:

1. Money Judgment:

A sum of money equal to at least \$ 5,257,067 in United States currency, including any interest accruing to the date of the judgment, representing the amount of money involved in the offense or traceable to property involved in the offense.

2. Real Property:

(A). A parcel of real estate, including the residence, garage, outbuildings, and all other appurtenances thereto and fixtures and improvements thereon, located at 11510 Anaheim Ave.

NE, Albuquerque, New Mexico, and more particularly described as:

LOT NUMBERED EIGHT (8) IN BLOCK NUMBERED SIXTEEN (16) OF TRACT NUMBERED TWO (2), UNIT NUMBERED ONE (1), OF NORTH ALBUQUERQUE ACRES, A SUBDIVISION OF A TRACT OF LAND IN SCHOOL DISTRICTS THREE (3) AND FOUR (4), ALBUQUERQUE, BERNALILLO COUNTY, NEW MEXICO, AS THE SAME IS SHOWN AND DESIGNATED ON THE PLAT OF SAID SUBDIVISION, FILED IN THE OFFICE OF THE COUNTY CLERKS OF BERNALILLO COUNTY, NEW MEXICO, ON MARCH 23, 1931, IN PLAT BOOK D, FOLIO 130.

(B). A parcel of real estate, including the residence, garage, outbuildings, and all other appurtenances thereto and fixtures and improvements thereon, located at 844 Secretariat Drive, Cibolo, Texas 78108, and more particularly described as:

LOT 12, BLOCK 22, BELMONT PARK SUBDIVISION, UNIT 2A SUBDIVISION IN GUADALUPE COUNTY, TEXAS, ACCORDING TO THE MAP OR PLAT THEREOF RECORDED IN VOLUME 6, PAGE 741 OF THE PLAT RECORDS GUADALUPE COUNTY, TEXAS.

PARCEL ID:R369622.

3. Funds:

Funds in the amount of \$10,149.87 from First National Bank of Fairfield Account Number 1503687.

4. Currency:

United States currency in the amounts of \$ 20,000 and \$ 5,900 found in 11510 Anaheim Ave. NE, Albuquerque, New Mexico on February 18, 2009. United States currency in the amount of \$4,100 found in the office of Neal Kasper at 5201 Venice Avenue NE, Suite A, Albuquerque, New Mexico on February 18, 2009.

5. Substitute Assets:

If any of the above described forfeitable property, as a result of any act or omission of the defendant:

- A. cannot be located upon exercise of due diligence;
- B. has been transferred or sold to, or deposited with, a third person;
- C. has been placed beyond the jurisdiction of the Court;
- D. has been substantially diminished in value; or
- E. has been commingled with other property which cannot be subdivided without difficulty;

