

**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>BASSAM SALAHELDEIN</b>	<b>:</b>	<b>VIOLATIONS:</b>
<b>KHALEEL EID</b>	<b>:</b>	<b>18 U.S.C. § 371 (conspiracy to commit</b>
<b>a/k/a Khalil Musa Alayayda</b>	<b>:</b>	<b>bribery - 1 count)</b>
	<b>:</b>	<b>18 U.S.C. § 666 (bribery – 1 count)</b>
	<b>:</b>	<b>18 U.S.C. §§ 1349, 1346 (conspiracy to</b>
	<b>:</b>	<b>commit mail and wire fraud: deprivation</b>
	<b>:</b>	<b>of right to honest services of public</b>
	<b>:</b>	<b>official - 1 count)</b>
	<b>:</b>	<b>18 U.S.C. § 2 (aiding and abetting)</b>

**INDICTMENT**

**COUNT ONE**

**THE GRAND JURY CHARGES THAT:**

At all times material to this indictment:

1. The City of Philadelphia and its citizens had a right to the honest services of their public officials in the operation of City government, including the Philadelphia Police Department.

**The Philadelphia Police Department**

2. The Philadelphia Police Department constituted a local government agency which received annual benefits in excess of \$10,000 in calendar year 2010 under Federal programs involving grants, contracts, subsidies, loans, guarantees, and other forms of federal assistance.

3. The Philadelphia Police Department and its officers were responsible for, among other things, promoting public safety and enforcing criminal laws within the City of

Philadelphia.

4. Philadelphia Police Officers, as public officials, owed the City of Philadelphia and its citizens, under the City Charter, the Philadelphia Code, and Pennsylvania and common law, a duty to: (a) refrain from the use of public office for private gain; (b) refrain from soliciting or accepting any item of monetary value, including bribes, gifts, loans, and other benefits, with the intent to be influenced, from any person seeking official action from, doing business with, or whose interests may be affected by the performance or nonperformance of his duties; and (c) disclose corruption to appropriate authorities.

5. Absent a legitimate excuse, every Philadelphia Police Officer had an obligation to appear in court when subpoenaed by the Philadelphia District Attorney's Office to testify in matters in which the officer was a witness due to the performance of official duties.

6. The Philadelphia Police Department was responsible for issuing licenses to carry firearms (LTCF), in accordance with federal and state law, to applicants residing in Philadelphia. As such, the Philadelphia Police Department was responsible for ensuring that LTCFs were not granted to individuals who were irresponsible, who posed a danger to others, or who were otherwise unfit or ineligible to possess an LTCF.

7. In order to issue LTCFs, the Philadelphia Police Department maintained written application forms which asked applicants questions about their background, including the existence of an applicant's criminal record. To obtain an LTCF, an individual applicant would need to meet with a Philadelphia Police Officer, provide truthful information for the application form, and be approved by the Philadelphia Police Department.

8. J.C. and L.O., persons known to the grand jury, were Philadelphia Police

Officers and, as such, were public officials of the City of Philadelphia. J.C. had the rank of Sergeant and L.O. had the rank of Officer.

**Criminal Cases to be “Fixed” by a Philadelphia Police Officer**

9. Defendant BASSAM SALAHELDEIN, a resident of Philadelphia, was previously arrested by Philadelphia Police for Aggravated Assault and was convicted in the Court of Common Pleas in Philadelphia for that case. Defendant SALAHELDEIN believed that this conviction made him ineligible to lawfully obtain an LTCF.

10. Defendant KHALEEL EID, a resident of Philadelphia, was previously arrested by Philadelphia Police for Aggravated Assault and had a pending criminal case in the Court of Common Pleas in Philadelphia for that case, scheduled for trial on November 13, 2010. L.O. was listed as the complainant in that case and was expected to testify at trial as a witness for the Philadelphia District Attorney’s Office in accordance with the performance of his official duties.

**Persons to be Coerced by a Philadelphia Police Officer**

11. M.B., a person known to the grand jury, was a person whom defendant BASSAM SALAHELDEIN wished to see harmed because defendant SALAHELDEIN believed M.B. had cost SALAHELDEIN money.

12. W.H., a person known to the grand jury, was a person whom defendant KHALEEL EID wished to see harmed because defendant EID believed W.H. had cost defendant EID money.

**THE CONSPIRACY**

13. From in or about at least October 13, 2010 to at least on or about

December 2, 2010, in the Eastern District of Pennsylvania, and elsewhere, defendants

**BASSAM SALAHELDEIN,  
KHALEEL EID,  
a/k/a Khalil Musa Alayayda**

conspired and agreed, together and with others known and unknown to the grand jury, to commit an offense against the United States, that is, to corruptly give, offer, and agree to give a thing of value to an agent of the Philadelphia Police Department, a local government agency which received benefits of over \$10,000 in a one-year period under a Federal program involving a grant, contract, subsidy, loan, and other form of federal assistance, intending to influence and reward the agent in connection with business, a transaction, and series of transactions of the Philadelphia Police Department of value of \$5,000 or more, in violation of Title 18, United States Code, Section 666(a)(2).

**OBJECTIVE OF THE CONSPIRACY**

14. It was an objective of the conspiracy to provide J.C. with approximately \$8,000 so that J.C. would abuse his position as a Philadelphia Police Officer for the personal gain of defendants BASSAM SALAHELDEIN and KHALEEL EID.

**MANNER AND MEANS**

It was part of the conspiracy that:

15. Defendants BASSAM SALAHELDEIN and KHALEEL EID provided payments of cash or promised cash to J.C. These payments were co-mingled in that part of the payments provided by Defendant EID were to be credited as payments from defendant SALAHELDEIN.

16. Defendants BASSAM SALAHELDEIN and KHALEEL used mobile

telephones to contact J.C. via text message and oral conversation.

17. Defendants BASSAM SALAHELDEIN and KHALEEL EID provided J.C. with biographical information about themselves so that J.C. could use illegal means to ensure that the criminal records of both men would not reflect any criminal convictions.

18. Defendants BASSAM SALAHELDEIN and KHALEEL EID provided J.C. with information about persons they wished to see harmed so that J.C. could use illegal means to achieve the results desired by the defendants.

### **OVERT ACTS**

In furtherance of the conspiracy, defendants BASSAM SALAHELDEIN and KHALEEL EID committed the following overt acts in the Eastern District of Pennsylvania and elsewhere:

1. On or about October 13, 2010, defendant BASSAM SALAHELDEIN met with J.C. and asked him if he had any police contacts in Northeast Philadelphia. Defendant SALAHELDEIN advised him that a friend needed help with a criminal case in which he had been arrested for assaulting a police officer during a traffic stop. Defendant SALAHELDEIN advised J.C. that his friend could pay several thousand dollars for J.C.'s "help." Defendant SALAHELDEIN told J.C. he would send J.C. the name and date of birth of his friend so that J.C. could look into the case.

2. On or about October 13, 2010, defendant KHALEEL EID gave defendant BASSAM SALAHELDEIN his date of birth so that defendant SALAHELDEIN could provide that information to J.C.

3. On or about October 13, 2010, defendant BASSAM SALAHELDEIN sent a text message to J.C. containing the name and date of birth of defendant KHALEEL EID so that J.C. could use his position as a Philadelphia Police Officer to investigate EID's case and decide whether he could fix it.

4. On or about October 19, 2010, defendant BASSAM SALAHELDEIN gave J.C. a bribe payment of \$300 and, among other things, an LTCF application containing false information about defendant SALAHELDEIN, including a fraudulent claim that defendant SALAHELDEIN had never been arrested for any crime. Defendant SALAHELDEIN told J.C. he had friends who might be willing to pay for J.C.'s illegal services. Defendant SALAHELDEIN took from J.C. blank LTCF applications for his friends.

5. On or about November 11, 2010, defendant BASSAM SALAHELDEIN met with J.C. to negotiate the amount of the payment due from defendant KHALEEL EID so that J.C. would ensure that L.O. would not appear to testify at EID's trial.

6. On or about November 15, 2010, defendant BASSAM SALAHELDEIN gave J.C. \$2,000 cash. Defendant SALAHELDEIN advised that defendant KHALEEL EID had given him the money and that \$500 of that money would be credited towards defendant SALAHELDEIN's payments to have J.C. illegally expunge defendant SALAHELDEIN's criminal conviction.

7. On or about November 19, 2010, defendant KHALEEL EID appeared at the Criminal Justice Center in Philadelphia, where his case was scheduled for trial. After defendant EID's case was continued because L.O. failed to appear, defendant EID met with J.C. outside of the Criminal Justice Center. Defendant EID told J.C. that he was grateful that, thanks

to J.C., L.O. had not appeared for trial that day and would not appear in the future. Defendant KHALEEL EID asked J.C. for his phone number so they could be "friends" in the future.

8. On or about November 19, 2010, defendant BASSAM SALAHELDEIN spoke with J.C. about the money needed for defendant SALAHELDEIN's record expungement. Defendant SALAHELDEIN told J.C. that he wanted to "force" M.B. to pay him back approximately \$30,000. Defendant SALAHELDEIN told J.C. that if J.C. could collect any portion of that money on defendant SALAHELDEIN's behalf, J.C. could keep 50% of the amount.

9. On or about November 22, 2010, defendant KHALEEL EID left two voice messages for J.C. When J.C. returned the messages on November 22, 2010, defendant EID offered J.C. payment in exchange for exacting revenge on W.H., that is, to "fuck him up."

10. On or about November 23, 2010, defendant KHALEEL EID met with J.C. and provided J.C. with information about W.H. Defendant EID stated he would be willing to pay the price of \$2,500 to attack W.H.

11. On or about November 24, 2010, defendant BASSAM SALAHELDEIN spoke with J.C. about the status of his LTCF and stated that he had another customer with money that also wanted J.C.'s help in obtaining an LTCF. Defendant SALAHELDEIN agreed that J.C. should consider new payments from EID as part of the fee for defendant SALAHELDEIN's record expungement. Defendant SALAHELDEIN further agreed that J.C. should consider money collected from M.B. as part of the fee toward the record expungement.

12. On December 2, 2010, defendant BASSAM SALAHELDEIN drove to the Philadelphia Police Gun Permit Unit in order to receive from J.C. a fraudulently obtained LTCF

and \$4,000 that defendant SALAHELDEIN believed J.C. had collected from M.B.

13. On December 2, 2010, Defendant KHALEEL EID drove to meet J.C. in order to discuss their illegal relationship.

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

**COUNT TWO**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. Paragraphs 1 to 12 and 14 to 18, and Overt Acts 1 to 13 of Count One of this indictment are incorporated here.

2. From in or about at least October 13, 2010 to at least on or about December 2, 2010, in the Eastern District of Pennsylvania defendants

**BASSAM SALAHELDEIN,  
KHALEEL EID,  
a/k/a Khalil Musa Alayayda**

corruptly gave, offered, and agreed to give a thing of value, and aided and abetted the corrupt giving, offering, and agreeing to give a thing of value, to J.C., an agent of the Philadelphia Police Department, a local government agency which received benefits of over \$10,000 in a one-year period under a Federal program involving a grant, contract, subsidy, loan, and other form of federal assistance, intending to influence and reward J.C. in connection with business, a transaction, and series of transactions of the Philadelphia Police Department of value of \$5,000 or more, that is, the expungement of defendant SALAHELDEIN's criminal conviction, the dismissal of defendant EID's pending criminal case, the acquisition of a LTCF based on fraudulent statements about defendant SALAHELDEIN's criminal history, the collection of \$8,000 from M.B., and the use of J.C.'s position as a Philadelphia Police Officer to perform favors and other corrupt activities on behalf of defendants SALAHELDEIN and EID, totaling more than \$6,300.

In violation of Title 18, United States Code, Sections 666(a)(2) and 2.

**COUNT THREE**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. Paragraphs 1 to 12 and 14 to 18 of Count One of this indictment are incorporated here.

2. From in or about at least October 13, 2010 to at least on or about December 2, 2010, in the Eastern District of Pennsylvania and elsewhere, defendants

**BASSAM SALAHELDEIN,  
KHALEEL EID,  
a/k/a Khalil Musa Alayayda**

conspired and agreed, together and with others known and unknown to the grand jury, to devise a scheme to defraud the City of Philadelphia and its citizens of the right to J.C.'s honest services in the affairs of the Philadelphia Police Department, and to use the United States mails and other interstate delivery services and interstate wire communications to further the scheme to defraud, in violation of Title 18, United States Code, Sections 1341, 1343, and 1346.

**OVERT ACTS**

In furtherance of the conspiracy, defendants BASSAM SALAHELDEIN and KHALEEL EID committed the following overt acts in the Eastern District of Pennsylvania and elsewhere:

1. Overt Acts 1 to 13 of Count One of this indictment are incorporated here.

2. On or about the dates listed below, in the Eastern District of Pennsylvania, and elsewhere, defendants BASSAM SALAHELDEIN and KHALEEL EID, for the purpose of executing the scheme described in paragraph 2, caused the following items to be sent using the United States mails and other interstate delivery services and interstate wire communications:

<b>DATE</b>	<b>DESCRIPTION</b>
November 19, 2010	A data transmission, containing case docket information for a criminal case, sent via the Internet from the Criminal Justice Center in Philadelphia to the Pennsylvania Common Pleas Case Management System.
November 29, 2010	A letter of approval from the City of Philadelphia Police Department Gun Permit Unit sent via U.S. Mail to the home address of defendant BASSAM SALAHHELDEIN.

All in violation of Title 18, United States Code, Sections 1349 and 1346.

**A TRUE BILL:**

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**GRAND JURY FOREPERSON**



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**ZANE DAVID MEMEGER**  
**UNITED STATES ATTORNEY**

**First Assistant U.S. Attorney**

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First Assistant U.S. Attorney