

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

UNITED STATES OF AMERICA	:	CRIMINAL NO. <u>10-_____</u>
v.	:	DATE FILED: <u>May 6, 2010</u>
SAMAN H. SALEM, a/k/a "Simon"	:	VIOLATIONS:
	:	18 U.S.C. § 1028(a)(1), (f) (production of an identification document without lawful authority - 1 count)
	:	18 U.S.C. § 1951(a), (b)(2) (extortion under color of official right - 1 count)
	:	31 U.S.C. §§ 5322, 5324 (structuring financial transactions to evade reporting requirements - 1 count)
	:	18 U.S.C. § 1512(c) (obstruction of justice - 1 count)
	:	26 U.S.C. § 7201 (tax evasion - 1 count)
	:	18 U.S.C. § 2 (aiding and abetting)
	:	Notice of forfeiture
	:	

INFORMATION

COUNT ONE

THE UNITED STATES ATTORNEY CHARGES THAT:

BACKGROUND

At all times material to this information:

1. From at least 2003 through the date of this information, defendant SAMAN H. SALEM, a/k/a "Simon," operated an illegal business in which he assisted individuals in obtaining fraudulent driver's licenses and other identification documents from the Pennsylvania Department of Transportation ("PennDOT"). His business went by the name of Professional Driving School. As part of his business, defendant SALEM made cash payments to PennDOT officials, including Harold Palmer, charged elsewhere, in exchange for the officials

issuing driver's licenses and identification cards without regard to applicants' qualifications. Defendant SALEM employed up to five individuals in his illegal business. Defendant SALEM made cash payments to Palmer in amounts of between \$20 and \$100 and caused the production of more than 200 fraudulent identification documents in this manner.

2. Defendant SAMAN H. SALEM posed as an interpreter who assisted applicants for Pennsylvania driver's licenses in taking a written administered by PennDOT. In fact, defendant SALEM assisted the applicants in cheating on the tests by providing the correct answers. Defendant SALEM assisted between 200 and 500 applicants in cheating on examinations in this manner.

3. Defendant SAMAN H. SALEM improperly obtained all or virtually all of the appointments for driving tests with driver's license examiners at PennDOT's Columbus Boulevard driver's license center by filling the appointments with names and identifying information that he stole. Defendant SALEM used more than 200 stolen identities in this manner. As a result, defendant SALEM controlled who was permitted to take driver's license examinations and other driving instructors were unable to obtain appointments at the Columbus Boulevard driver's license center. Defendant SALEM also manipulated PennDOT procedures so that Harold Palmer conducted numerous driving tests for defendant SALEM's customers.

4. To conceal the fact that defendant SAMAN H. SALEM was making illegal cash payments to Harold Palmer, on or about early 2008 and again in or about November 2008, defendant SALEM instructed Palmer not to tell authorities that Palmer was receiving cash payments from SALEM. Defendant SALEM further concealed the cash payments by passing

them to Palmer via a handshake or in a bag that contained free food or drinks supplied to Palmer by defendant SALEM.

5. Defendant SAMAN H. SALEM made more than \$1 million in cash from his scheme. On or about March 15, 2010, defendant SALEM possessed approximately \$58,718 in cash in his residence in Philadelphia and \$250,000 in cash in a safety deposit box at a bank in Philadelphia, all of which were proceeds of the scheme.

6. On or about August 26, 2009, in the Eastern District of Pennsylvania, defendant

**SAMAN H. SALEM,
a/k/a "Simon,"**

produced, attempted to produce, conspired to produce, and aided and abetted and wilfully caused the production of, without lawful authority, a form of identification, that is, a Pennsylvania driver's license and driving permit in the name of A.A.I., a person known to the United States Attorney.

In violation of Title 18, United States Code, Section 1028(a)(1), (f).

COUNT TWO

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

Between in or about early 2008 and on or about March 15, 2010, in the Eastern District of Pennsylvania, and elsewhere, defendant

**SAMAN H. SALEM,
a/k/a "Simon,"**

obstructed, delayed and affected commerce, and the movement of articles and commodities in commerce, aided and abetted such obstruction, delay, and affect, and attempted to do so, by extortion, in that the defendant SALEM obtained and attempted to obtain property, that is cash payments from individuals seeking Pennsylvania driver's licenses, with the consent of the individuals, under color of official right, part of which defendant SALEM paid to Harold Palmer, an official of PennDOT, which were not due Palmer.

All in violation of Title 18, United States Code, Sections 1951(a), (b)(2) and 2.

COUNT THREE

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

From January 1, 2005 through March 15, 2010, in the Eastern District of Pennsylvania, and elsewhere, defendant

**SAMAN H. SALEM,
a/k/a "Simon,"**

for the purpose of evading the reporting requirements of Title 31, United States Code, Section 5313(a) and the regulations promulgated thereunder, knowingly caused and attempted to cause a domestic financial institution to fail to file Currency Transaction Reports ("CTR") for currency transactions in excess of \$10,000, by depositing cash into his accounts totaling in excess of \$10,000 at one time with a bank without a CTR being filed, including, but not limited to, depositing approximately \$19,800 in cash in two deposits of \$9,900 each on June 2, 2008.

In violation of Title 31, United States Code, Sections 5322(a) and 5324(a)(1).

COUNT FOUR

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

1. Beginning in approximately June 2008, United States Immigration and Customs Enforcement (“ICE”) and the United States Attorney’s Office commenced an investigation into, among other things, defendant SAMAN H. SALEM’s operation of an illegal business in which he assisted individuals in obtaining Pennsylvania driver’s licenses and other documents by making cash payments to PennDOT officials and acting as a corrupt interpreter who assisted defendant SALEM’s customers in cheating on PennDOT driving examinations. The Federal Bureau of Investigation (“FBI”), the United States Department of Transportation – Office of Inspector General, the Internal Revenue Service (“IRS”), and the Pennsylvania State Police later joined the investigation.

2. In approximately June 2008, a federal grand jury sitting in the Eastern District of Pennsylvania commenced an investigation into the matter described above.

3. Between January and March 2010, an individual defendant SAMAN H. SALEM knew as “Marwan” solicited defendant SALEM to assist “Marwan” in corruptly obtaining a Pennsylvania driver’s license using fraudulent identity documents that “Marwan” advised defendant SALEM falsely showed that “Marwan” was a United States Citizen born in Puerto Rico.

4. On or about March 9, 2010, defendant SAMAN H. SALEM spoke with Harold Palmer, who, at the time, was cooperating with the federal agents conducting the investigation described above. During this conversation, defendant SALEM urged Palmer to lie and falsely claim that Palmer had not received any cash payments from defendant SALEM.

5. On approximately March 11, 2010, as part of the federal grand investigation, FBI Special Agents asked defendant SAMAN H. SALEM whether he knew “Marwan” or whether he had had any contact with “Marwan” recently. In order to obstruct the above-described investigation, defendant SALEM falsely denied that he had had contact with “Marwan” or that he knew “Marwan” even though, as defendant SALEM knew, he had had numerous conversations with a person he knew as “Marwan” about obtaining a fraudulent driver’s license using papers that falsely identified “Marwan” as a United States citizen born in Puerto Rico.

6. On or about March 9, 2010, in the Eastern District of Pennsylvania, defendant

**SAMAN H. SALEM,
a/k/a “Simon,”**

corruptly endeavored to influence, obstruct, and impede the due administration of justice, that is, the pending federal grand jury investigation of described above by: (a) lying to federal agents about whether defendant SALEM had spoken to or had contact with a person defendant SALEM knew as “Marwan;” and (b) urging and attempting to convince Harold Palmer to falsely deny having received cash payments of any kind from defendant SALEM.

In violation of Title 18, United States Code, Section 1512(c).

COUNT FIVE

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

1. Paragraphs One through Five of Count One are incorporated by reference.

2. Between on or about January 1, 2003, and the date of this information, in the Eastern District of Pennsylvania and elsewhere, defendant

**SAMAN H. SALEM,
a/k/a "Simon,"**

willfully engaged in a continuing attempt to evade and defeat a large part of the tax due and owing by him and to the United States of America for the calendar years 2003 through 2009, through various means. As a result of this course of conduct, defendant SALEM evaded the payment of more than \$200,000 in federal taxes.

2. As part of this attempt to evade federal income taxes, defendant SAMAN H. SALEM committed the following overt acts, among others:

a. He conducted his business predominantly in cash as a way to conceal the fact that he was receiving hundreds of thousands of dollars in taxable income each year.

b. He paid his employees' wages entirely in cash, did not properly account for these wages, did not withhold taxes from these wages, and did not issue statements to his employees listing the wages paid them.

c. He did not deposit all of the cash received from the operation of his business into his bank accounts to conceal the true amount of taxable income he receive each year.

d. He stored hundreds of thousands of dollars in cash in his home and a safety deposit box at a bank in Philadelphia.

e. He filed a materially false 2003 federal income tax return which grossly understated his adjusted gross income.

f. He failed to file any federal income tax returns for the years 2004 through 2009.

g. He structured cash deposits into his bank accounts to avoid currency reporting requirements.

h. He transferred large amounts of cash from his accounts in Pennsylvania to accounts overseas.

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

NOTICE OF FORFEITURE

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

1. As a result of the violations of Title 18, United States Code, Sections 1028(a)(1), (f) and 31 U.S.C. §§ 5322 and 5324, set forth in this information defendant

**SAMAN H. SALEM,
a/k/a "Simon,"**

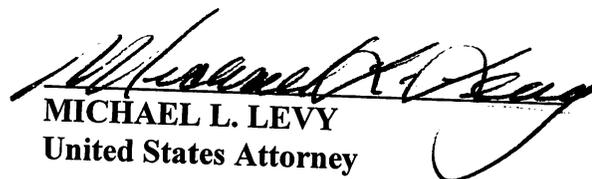
shall forfeit to the United States of America: (a) any property, real or personal, that constitutes or is derived from proceeds traceable to the commission of such offenses; and (b) any property, real or personal, that was involved in the commission of such offense, including, but not limited to, approximately \$308,718 in United States currency seized from defendant SAMAN H. SALEM on or about March 15, 2010.

2. If any of the property subject to forfeiture, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (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 divided without difficulty;

it is the intent of the United States, pursuant to Title 28, United States Code, Section 2461(c), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendants up to the value of the property subject to forfeiture.

All pursuant to Title 18, United States Code, Section 982(a)(2)(B), and Title 31,
United States Code, Section 5317(c).


MICHAEL L. LEVY
United States Attorney