

JUL 10 2013

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF ARKANSAS

JAMES W. McORMACK, CLERK
By: *Kathy Sullivan*
DEP. CLERK

UNITED STATES OF AMERICA)
)
v.)
)
AMJAD KATTOM; SAHAR KATTOM;)
YOUSEF QATTOUM; ABDUL AZIZ)
FARISHTA; EASSA RAWASHDEH;)
RODNEY BRYANT; AND)
ADAM KATTOUM)

No. 4:13CR 00197 BEM
21 U.S.C. §§ 841(a)(1), 841(b)(1)(C), and
813
21 U.S.C. § 846
18 U.S.C. § 1956(h)

INDICTMENT

THE GRAND JURY CHARGES THAT:

COUNT 1

From in or about July 2012, through on or about June 26, 2013, in the Eastern
District of Arkansas and elsewhere, the defendants,

AMJAD KATTOM;
SAHAR KATTOM;
YOUSEF QATTOUM;
ABDUL AZIZ FARISHTA;
EASSA RAWASHDEH;
RODNEY BRYANT; AND
ADAM KATTOUM

knowingly and intentionally conspired and agreed with each other, and with persons
known and unknown to the Grand Jury, to distribute and possess with intent to distribute
controlled substances and analogues of controlled substances, including:

- (1) prior to July 9, 2012, a mixture and substance containing a detectable amount of
AM-2201, a controlled substance analogue as defined in Title 21, United States
Code, Section 802(32), with intent for human consumption as provided in Title 21,

United States Code, Section 813, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C);

(2) prior to May 16, 2013, a mixture and substance containing a detectable amount of UR-144 and XLR11, controlled substance analogues as defined in Title 21, United States Code, Section 802(32), with intent for human consumption as provided in Title 21, United States Code, Section 813, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C);

(3) a mixture and substance containing a detectable amount of pentadrone, alpha-PVP, 4-MePPP, buphedrone, AKB48 N-(5-fluoropentyl), 5-fluoro PB-22, PB-22, and 5-MeO DALT, controlled substance analogues as defined in Title 21, United States Code, Section 802(32), with intent for human consumption as provided in Title 21, United States Code, Section 813;

(4) from July 9, 2012, and continuing until June 26, 2013, a mixture and substance containing a detectable amount of AM-2201, JWH-081, JWH-122, JWH-203, JWH-250, and MDPV, Schedule I controlled substances; and

(5) from May 16, 2013, and continuing until June 26, 2013, a mixture and substance containing a detectable amount of XLR11,

in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

All in violation of Title 21, United States Code, Section 846.

COUNT 2

On or about October 22, 2012, in the Eastern District of Arkansas, the defendant,

YOUSEF QATTOUM

knowingly and intentionally distributed and possessed with intent to distribute a mixture and substance containing a detectable amount of XLR11, a controlled substance analogue as defined in Title 21, United States Code, Section 802(32), knowing the substance was intended for human consumption as provided in Title 21, United States Code, Section 813.

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 3

On or about October 23, 2012, in the Eastern District of Arkansas, the defendant,

YOUSSEF QATTOUM

knowingly and intentionally distributed and possessed with intent to distribute a mixture and substance containing a detectable amount of XLR11, a controlled substance analogue as defined in Title 21, United States Code, Section 802(32), knowing the substance was intended for human consumption as provided in Title 21, United States Code, Section 813.

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 4

On or about May 9, 2013, in the Eastern District of Arkansas, the defendant,

EASSA RAWASHDEH

knowingly and intentionally distributed and possessed with intent to distribute a mixture and substance containing a detectable amount of PB-22, a controlled substance analogue as defined in Title 21, United States Code, Section 802(32), knowing the substance was intended for human consumption as provided in Title 21, United States Code, Section 813.

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 5

On or about June 3, 2013, in the Eastern District of Arkansas, the defendant,

ADAM KATTOUM

knowingly and intentionally distributed and possessed with intent to distribute a mixture and substance containing a detectable amount of XLR11, a Schedule I controlled substance, and PB-22, a controlled substance analogue as defined in Title 21, United States Code, Section 802(32), knowing the substance was intended for human consumption as provided in Title 21, United States Code, Section 813.

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 6

A. Prior to June 26, 2013, the defendant,

RODNEY BRYANT

had previously been convicted as follows:

1. In Pulaski County Circuit Court for theft of property, in criminal case CR 2011-0602;

B. The crime set forth in paragraph A above was punishable by a term of imprisonment exceeding one year.

C. On or about June 26, 2013, in the Eastern District of Arkansas,

RODNEY BRYANT

did knowingly possess a firearm in and affecting commerce, to wit, a Ruger, model P94, .40 caliber pistol, bearing serial number 340-73339, thereby violating Title 18, United States Code, Section 922(g)(1).

COUNT 7

From in or about July 2012 and continuing through on or about June 26, 2013, in the Eastern District of Arkansas and elsewhere, the defendants,

AMJAD KATTOM and
SAHAR KATTOM

knowingly and intentionally conspired with each other, and with others known and unknown to the Grand Jury, to commit offenses against the United States in violation of Title 18, United States Code, Section 1956, to wit:

(a) to knowingly conduct and attempt to conduct financial transactions affecting interstate and foreign commerce, which involved the proceeds of a specified unlawful activity, that is, conspiracy to distribute and possess with intent to distribute controlled substances and analogues of controlled substances, in violation of Title 21, United States Code, Section 846, with the intent to promote the carrying on of specified unlawful activity, that is conspiracy to distribute and possess with intent to distribute controlled substances and analogues of controlled substances, in violation of Title 21, United States Code, Section 846, and that while conducting and attempting to conduct such financial transactions knew that the property involved in the financial transactions represented the proceeds of some form of unlawful activity in violation of Title 18, United States Code, Section 1956(a)(1)(A)(i); and

(b) to knowingly conduct and attempt to conduct financial transactions affecting interstate and foreign commerce, which transactions involved the proceeds of specified unlawful activity, that is, conspiracy to distribute and possess with intent to distribute controlled substances and analogues of controlled substances, in violation of Title 21, United States Code, Section 846, knowing that the transactions were designed in whole or in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, and that while conducting and attempting to conduct such financial transactions, knew that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

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

COUNT 8

From in or about July 2012 and continuing through on or about June 26, 2013, in the Eastern District of Arkansas and elsewhere, the defendants,

YOUSEF QATTOUM and
ABDUL AZIZ FARISHTA

knowingly and intentionally conspired with each other, and with others known and unknown to the Grand Jury, to commit offenses against the United States in violation of Title 18, United States Code, Section 1956, to wit:

(a) to knowingly conduct and attempt to conduct financial transactions affecting interstate and foreign commerce, which involved the proceeds of a specified unlawful activity, that is, conspiracy to distribute and possess with intent to distribute controlled

substances and analogues of controlled substances, in violation of Title 21, United States Code, Section 846, with the intent to promote the carrying on of specified unlawful activity, that is conspiracy to distribute and possess with intent to distribute controlled substances and analogues of controlled substances, in violation of Title 21, United States Code, Section 846, and that while conducting and attempting to conduct such financial transactions knew that the property involved in the financial transactions represented the proceeds of some form of unlawful activity in violation of Title 18, United States Code, Section 1956(a)(1)(A)(i); and

(b) to knowingly conduct and attempt to conduct financial transactions affecting interstate and foreign commerce, which transactions involved the proceeds of specified unlawful activity, that is, conspiracy to distribute and possess with intent to distribute controlled substances and analogues of controlled substances, in violation of Title 21, United States Code, Section 846, knowing that the transactions were designed in whole or in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, and that while conducting and attempting to conduct such financial transactions, knew that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

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

FORFEITURE ALLEGATION 1

Upon conviction of the offense set forth in Count 1 of this Indictment, the defendants,

AMJAD KATTOM and
SAHAR KATTOM

shall forfeit to the United States, under Title 21, United States Code Section 853, all property constituting or derived from, proceeds obtained directed or indirectly from the offense and all property used and intended to be used to commit, or to facilitate the commission of the offense, including but not limited to the following property:

1. Approximately \$17,338.40 in United States currency;
2. Real Property and Buildings Located at 410 Parliament Street, Little Rock, Arkansas; and
3. Real Property and Buildings Located at 3200 Baseline Road, Little Rock, Arkansas.

FORFEITURE ALLEGATION 2

Upon conviction of the offense set forth in Count 7 of this Indictment, the defendants,

AMJAD KATTOM and
SAHAR KATTOM

shall forfeit to the United States, under Title 21, United States Code, Section 982(a)(1), all property constituting or derived from, proceeds obtained directed or indirectly from the offense and all property used and intended to be used to commit, or to facilitate the commission of the offense, including but not limited to the following property:

1. Approximately \$17,338.40 in United States currency;
2. Real Property and Buildings Located at 410 Parliament Street, Little Rock, Arkansas; and

3. Real Property and Buildings Located at 3200 Baseline Road, Little Rock, Arkansas.

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