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EASTERN DISTRICT OF LOUISIANA

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UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA

**FELONY**

**BILL OF INFORMATION FOR CONSPIRACY TO BRIBE  
AN AGENT OF LOCAL GOVERNMENT IN CONNECTION WITH A  
PROGRAM RECEIVING FEDERAL FUNDS**

UNITED STATES OF AMERICA

\*

CRIMINAL NO.

**13-123**

v.

\*

SECTION:

**SECT. L MAG. 4**

ZUHAIR AMEER HAMED  
JIHAD HATEM HAMAD

\*

VIOLATION: 18 U.S.C. § 371

\* \* \*

The United States Attorney charges that:

**COUNT 1**

**A. AT ALL TIMES MATERIAL HEREIN:**

1. The City of Harahan, Louisiana, was a local government which received in excess of \$10,000 in federal funds under federal programs, contracts, subsidies, loans, guarantees, insurance and other forms of federal assistance during the one year period ending June 30, 2012.

2. Public Official A, the Chief of Police of the City of Harahan, Louisiana (Harahan) who took office on January 1, 2011, was an agent of a local government, namely, the City of Harahan.

3. Defendant, **ZUHAIR AMEER HAMED (ZUHAIR HAMED)** was a person of the full age of majority who resided in Jefferson Parish, Louisiana.

4. Defendant, **JIHAD HATEM HAMAD (JIHAD HAMAD)** owned and operated a gas station and convenience store called Harahan Cheap Smokes (HCS), which was located at 6492 Jefferson Highway in the City of Harahan, Louisiana (Harahan). From in or about 2010 through 2012, **JIHAD HAMAD** was seeking a high-volume alcoholic beverage permit authorizing the sale of wine and hard liquor at HCS.

5. A church was located at 6500 Jefferson Highway, Harahan, Louisiana. The church was located less than 300 feet from HCS. Louisiana law and Harahan ordinances prohibit the sale of alcoholic beverages from premises located within 300 feet or less of a church. However, a permit may be issued allowing the sale of beverages of low alcoholic content, 6% alcohol content or less, (i.e., beer) in packages only for consumption off the premises, from a location within 300 feet of a church. HCS had been granted a permit authorizing the sale of low alcoholic content (i.e., beer).

6. The issuance of a Harahan permit for the sale of wine and hard liquor requires, among other things, a formal statement of no objection from the Chief of Police of Harahan.

7. Because a permit authorizing the sale of wine and hard liquor at HCS would lead to increased revenue at HCS, the value of the permit sought exceeded \$5,000.

8. During repeated discussions between **JIHAD HAMAD** and Public Official A about the application of HCS for a permit authorizing the sale of wine and hard liquor at HCS, Public Official A stated he would oppose the issuance of such permit because HCS was located within 300 feet of a church.

9. Public Official A was acquainted with **ZUHAIR HAMED** and erroneously believed that **ZUHAIR HAMED** was the father of **JIHAD HAMAD**. In fact, **ZUHAIR HAMED** and **JIHAD HAMAD** are not related.

10. Defendants, **ZUHAIR HAMED** and **JIHAD HAMAD**, together with others known and unknown to the United States Attorney, agreed to corruptly give and offer to give something of value, namely money, with the intent to influence an agent of a local government, namely Public Official A, in connection with any business, transaction and series of transactions, namely, the issuing or denial of a permit authorizing the sale of high-volume alcoholic beverages at HCS and any statement of no objection to the issuance of a permit authorizing the sale of high-volume alcoholic beverages at HCS.

**B. THE CONSPIRACY:**

Beginning at a time unknown but prior to on or about March 27, 2012 and continuing through in or about July 2012 in the Eastern District of Louisiana, and elsewhere, the defendants, **ZUHAIR AMEER HAMED**, and **JIHAD HATEM HAMAD**, together with others known and unknown to the United States Attorney, did knowingly and willfully combine, conspire and agree to violate Title 18, United States Code, Section 666 (a)(2) by corruptly giving, offering and agreeing to give anything of value to any person, with the intent to influence and reward an agent of the City of Harahan in connection with business, transactions and a series of transactions of the City of Harahan involving anything of value of \$5,000 or more, namely, the issuance of a high-volume alcoholic permit authorizing the sale of wine and hard liquor at Harahan Cheap Smokes and the recommendation in favor of or statement of lack of opposition to the issuance of such permit.

**C. OVERT ACTS:**

On or about the following dates, in furtherance of and to conceal the conspiracy and accomplish its purposes, the defendants, **ZUHAIR AMEER HAMED** and **JIHAD HATEM**

**HAMAD**, committed the following overt acts, among others, in the Eastern District of Louisiana and elsewhere.

1. On or about March 26, 2012, **JIHAD HAMAD** offered to have a campaign contribution to Public Official A's campaign made by the father of **JIHAD HAMAD** in exchange for Public Official A's statement of no objection to the application for a high-volume alcohol permit for HCS.

2. During a meeting on or about May 22, 2012, **ZUHAIR HAMED** offered to provide Public Official A a payment he characterized as a campaign contribution. He offered to pay Public Official A by means of a money order in blank, a business check to Public Official A's campaign, or cash in an envelope.

3. During a meeting on or about May 25, 2012, **ZUHAIR HAMED** offered to pay Public Official A the sum of \$2,000 and later stated that he would pay Public Official A more than "ten" over the course of a year.

4. Between in or about May 2012 and June 2012, **JIHAD HAMAD** gave **ZUHAIR HAMED** a total of \$3,000 for the purpose of making payments to Public Official A in return for Public Official A issuing a statement of no objection to the application of HCS for a high-volume alcoholic beverage permit.

5. On June 19, 2012, **ZUHAIR HAMED** gave Public Official A a check in the amount of \$2,000 drawn on the account of a business associated with **ZUHAIR HAMED**'s family member. The check did not have the name of the payee completed when it was tendered to Public Official A. **ZUHAIR HAMED** stated to Public Official A that Public Official A could make the check payable to whomever he wished.

6. On June 21, 2012, **ZUHAIR HAMED** provided \$1,000 in cash to Public Official A, and agreed to make additional payments as follows: \$1,000 by the first of July [2012] and an additional \$1,000 by the middle of July [2012].

7. On June 21, 2012, **JIHAD HAMAD** joined the meeting of **ZUHAIR HAMED** and Public Official A, and **JIHAD HAMAD** and **ZUHAIR HAMED** participated in a conversation regarding the amount of money HCS was losing due to the lack of a high-volume alcoholic permit which would allow it to sell wine and hard liquor.

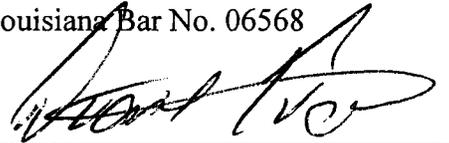
All in violation of Title 18, United States Code, Section 371.



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New Orleans, Louisiana  
May 30, 2013