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UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION

UNITED STATES OF AMERICA

v.

CASE NO. 8:14-cr-183-T-23 TGW

HARMEET SINGH,
CEAN AL NAJJAR, and
MICHAEL PETRUCCI

21 U.S.C. §§ 802, 813, 846, 841(a)(1)
21 U.S.C. § 853 – Forfeiture

INDICTMENT

The Grand Jury charges:

COUNT ONE

From on or about March 1, 2011, through on or about March 23, 2012, in the Middle District of Florida and elsewhere, the defendants,

HARMEET SINGH,
CEAN AL NAJJAR, and
MICHAEL PETRUCCI

did knowingly and willfully conspire and agree with each other and with others both known and unknown to the Grand Jury to distribute a quantity of a mixture and substance containing a detectable amount of 1-(5-Fluoropentyl)-3-(1-naphthoyl)indole (AM2201), a controlled substance analogue, intended for human consumption, contrary to the provisions of Title 21, United States Code, Section 841(a)(1).

In violation of Title 21, United States Code, Sections 846, 802(32), 813, and 841(b)(1)(C).

COUNT TWO

From on or about March 1, 2011 through on or about March 23, 2012, in the Middle District of Florida and elsewhere, the defendants,

HARMEET SINGH,
CEAN AL NAJJAR, and
MICHAEL PETRUCCI

did knowingly and intentionally distribute, and aid and abet each other in distributing, a quantity of a mixture and substance containing a detectable amount 1-(5-Fluoropentyl)-3-(1-naphthoyl)indole (AM2201), a controlled substance analogue, intended for human consumption.

In violation of Title 21, United States Code, Sections 841(a)(1), 802(32), 813, and 841(b)(1)(C), and Title 18, United States Code, Section 2.

FORFEITURES

1. The allegations contained in Counts One and Two of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures, pursuant to the provisions of Title 21, United States Code, Section 853.

2. Upon conviction of the violations alleged in Counts One and Two of this Indictment, punishable by imprisonment for more than one (1) year,

HARMEET SINGH,

CEAN AL NAJJAR, and
MICHAEL PETRUCCI

the defendants herein, shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, all of their interest in:

- a. Property constituting, or derived from, any proceeds the defendants obtained, directly or indirectly, as a result of such violations; and
 - b. Property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such violations.
3. The property to be forfeited includes, but is not limited to:
- a. A forfeiture money judgment of at least \$13,145,032.65, representing the proceeds of the offenses;
 - b. The contents of the following bank accounts, which contain proceeds of, and constitute property intended to facilitate, the offenses in Counts One and Two:
 - i. Wells Fargo Bank Account 2000036103076 in the name of Honey 2000 Inc.;
 - ii. Wells Fargo Bank Account# 2000053963069 in the name of My Monster Glass LLC; and ;
 - iii. Wells Fargo Bank Account 2000042775977 in the name of Natures Organic LLC.

c. The real property located at 1921 Lago Vista Blvd, Palm Harbor

Florida, titled in the name of Cean Al Najjar and Rosemarie

Caputo-Al Najjar, more specifically described as:

LOT 76, BOOT RANCH EAGLE WATCH PHASE B-1,
ACCORDING TO THE PLAT THEREOF, AS RECORDED IN
PLAT BOOK 104, PAGE 62, PUBLIC RECORDS OF PINELLAS
COUNTY, FLORIDA,

which was purchased with the proceeds of the offenses charged
in Counts One and Two; and

d. The real property located at 12236 McKinnon Road Orlando,

Florida, held in the name of Harmeet Singh, and more specifically

described as:

A PORTION OF THE NORTHEAST ONE-QUARTER OF
SECTION 1, TOWNSHIP 23 SOUTH, RANGE 21 EAST,
ORANGE COUNTY, FLORIDA, BEING MORE PARTICULARLY
DESCRIBED AS FOLLOWS; COMMENCING AT THE EAST
QUARTER CORNER OF SAID SECTION 1 RUN NORTH 89
DEGREES 29 MINUTES 21 SECONDS WEST ALONG THE
SOUTH LINE OF SAID NORTHEAST ONE-QUARTER TO A
POINT BEING THE POINT OF BEGINNING OF SAID PARCEL
A, SAID POINT BEING SOUTH 89 DEGREES 29 MINUTES 21
SECONDS EAST 636.71 FEET FROM A CONCRETE
MONUMENT ON THE NORTH LINE OF TRACT A, SAID
MONUMENT BEING NORTH 89 DEGREES 29 MINUTES 21
SECONDS WEST 109.14 FEET OF THE NORTHWEST
CORNER OF LOT 68, BUTLER BAY-UNIT THREE
ACCORDING TO THE PLAT THEREOF AS RECORDED IN
PLAT BOOK 18, PAGES 4 THROUGH 9, OF THE PUBLIC
RECORDS OF ORANGE COUNTY, FLORIDA, THENCE
CONTINUE NORTH 89 DEGREES 29 MINUTES 21 SECONDS
WEST 636.71 FEET TO SAID CONCRETE MONUMENT,
THENCE DEPARTING SAID LINE RUN NORTH 3 DEGREES

16 MINUTES 08 SECONDS WEST 7.58 FEET TO A CONCRETE MONUMENT AND THE SOUTH RIGHT OF WAY OF MCKINNON ROAD, THENCE NORTH 12 DEGREES 55 MINUTES 54 SECONDS EAST 656.64 FEET ALONG SAID SOUTH RIGHT OF WAY TO A POINT, THENCE DEPARTING SAID RIGHT OF WAY RUN SOUTH 2 DEGREES 36 MINUTES 46 SECONDS EAST 206.19 FEET TO THE POINT OF BEGINNING,

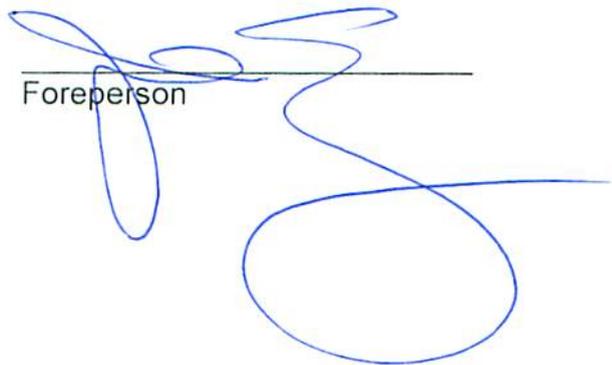
which was purchased with the proceeds of the offenses charged in Counts One and Two.

4. If any of the property described above as being subject to forfeiture, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred, 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;

the United States will seek, pursuant to Title 21, United States Code,
Section 853(p), forfeiture of any other property of said defendants up to the value
of the forfeitable property.

A TRUE BILL,

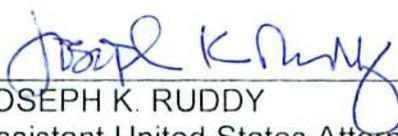


Foreperson

A. LEE BENTLEY, III
United States Attorney

By: 

JAMES A. MUENCH
Assistant United States Attorney

By: 

JOSEPH K. RUDDY
Assistant United States Attorney
Chief, Narcotics Section

UNITED STATES DISTRICT COURT
Middle District of Florida
Tampa Division

THE UNITED STATES OF AMERICA

vs.

HARMEET SINGH
CEAN AL NAJJAR, and
MICHAEL PETRUCCI

INDICTMENT

Violations:

21 U.S.C. §§ 802, 813, 846, 841(a)(1)
21 U.S.C. § 853 – Forfeiture

A true bill,



Foreperson

Filed in open court this 7th day
of May, 2014.

Clerk

Bail \$ _____