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United States of America

**FILED**

**JUL 21 2016**

CLERK, U.S. DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA  
BY J. HELINGS  
DEPUTY CLERK

8 IN THE UNITED STATES DISTRICT COURT  
9 EASTERN DISTRICT OF CALIFORNIA

11 UNITED STATES OF AMERICA,  
12 Plaintiff,

13 v.

14 YOUSEF DAHIFALLA AEZAH,  
ADHIM DAHIFALLA AEZAH, AND  
15 DIRAR DAHIFALLA AEZAH,  
16 Defendant.

CASE NO: **16 CR 000 107 DAD BAM**

**VIOLATIONS:**

21 U.S.C. §§ 846 and 841(a)(1), 841(b)(1)(C), &  
856(a) - Conspiracy to Manufacture, Distribute, and  
to Possess with the Intent to Distribute a Controlled  
Substance, and to Maintain Drug-Involved Premises;  
21 U.S.C. § 841(a)(1) & 841(b)(1)(C) – Distribution  
of a Controlled Substance; 21 U.S.C. § 856(a) –  
Maintaining Drug-Involved Premises; and  
21 U.S.C. § 853 – Criminal Forfeiture.

INDICTMENT

19 I. INTRODUCTION

20 At all relevant times herein:

21 1. Defendants YOUSEF DAHIFALLA AEZAH, ADHIM DAHIFALLA AEZAH, and  
22 DIRAR DAHIFALLA AEZAH, resided in or around Bakersfield, in the State and Eastern District of  
23 California.

24 2. AB-CHMINACA was a synthetic cannabinoid that was a Schedule I controlled substance  
25 as of January 30, 2015.

26 ///

27 ///

28 ///

1 COUNT ONE: [21 U.S.C. §§ 846 and 841(a)(1), 841(b)(1)(C), & 856(a) - Conspiracy to Manufacture,  
2 Distribute, and to Possess with Intent to Distribute a Controlled Substance, and to  
3 Maintain Drug-Involved Premises]

4 The Grand Jury charges:

5 YOUSEF DAHIFALLA AEZAH,  
6 ADHIM DAHIFALLA AEZAH, and  
7 DIRAR DAHIFALLA AEZAH,

8 defendants herein, as follows:

9 3. Paragraphs 1 through 2 are incorporated by reference as fully set forth herein.

10 4. Beginning at a time unknown, but no later than in or around January 2015, and  
11 continuing to in or around July 2016, in the County of Kern, within the State and Eastern District of  
12 California, and elsewhere, defendants YOUSEF DAHIFALLA AEZAH, ADHIM DAHIFALLA  
13 AEZAH, and DIRAR DAHIFALLA AEZAH did knowingly and intentionally conspire among  
14 themselves and with other persons, known and unknown to the Grand Jury, to manufacture, distribute,  
15 and to possess with intent to distribute a controlled substance, to wit: AB-CHMINACA, a Schedule I  
16 controlled substance, and to maintain a drug-involved premises, to wit: 4800 New Horizon Blvd., Unit  
17 A, Bakersfield, California, for the purpose of manufacturing and distributing a controlled substance, to  
18 wit: AB-CHMINACA, a Schedule I controlled substance, all in violation of Title 21, United States  
19 Code, Sections 846 and 841(a)(1), 841(b)(1)(C), & 856(a).

20  
21 COUNT TWO: [21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C) – Distribution of a Controlled Substance]

22 The Grand Jury further charges:

23 YOUSEF DAHIFALLA AEZAH,  
24 ADHIM DAHIFALLA AEZAH, and  
25 DIRAR DAHIFALLA AEZAH,

26 defendants herein, as follows:

27 5. Paragraphs 1 through 4 are incorporated by reference as fully set forth herein.

28 6. On or about April 1, 2016, in the County of Kern, within the State and Eastern District of  
California, and elsewhere, defendants YOUSEF DAHIFALLA AEZAH, ADHIM DAHIFALLA

1 AEZAH, and DIRAR DAHIFALLA AEZAH did knowingly and intentionally distribute, and aid and  
2 abet the distribution of, to wit: AB-CHMINACA, a Schedule I controlled substance, in violation of Title  
3 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).  
4

5 COUNT THREE: [21 U.S.C. § 856(a) – Maintaining Drug-Involved Premises]

6 The Grand Jury further charges:

7 YOUSEF DAHIFALLA AEZAH,  
8 ADHIM DAHIFALLA AEZAH, and  
9 DIRAR DAHIFALLA AEZAH,

defendants herein, as follows:

10 7. Paragraphs 1 through 6 are incorporated by reference as fully set forth herein.

11 8. Defendants YOUSEF DAHIFALLA AEZAH, ADHIM DAHIFALLA AEZAH, and  
12 DIRAR DAHIFALLA AEZAH, from in or around January 2016 continuing to in or around July 2016,  
13 in the County of Kern, within the State and Eastern District of California, and elsewhere, did use and  
14 maintain, and aid and abet the use and maintenance of, a place: to wit: 4800 New Horizon Blvd., Unit A,  
15 Bakersfield, California, for the purpose of manufacturing and distributing a controlled substance, to wit:  
16 AB-CHMINACA, a Schedule I controlled substance, in violation of Title 21, United States Code,  
17 Sections 856(a).  
18

19  
20 FORFEITURE ALLEGATION: [21 U.S.C. §853(a) – Criminal Forfeiture]

21 The Grand Jury further alleges THAT:

22 The allegations set forth in the above Indictment are incorporated by reference as though  
23 fully set forth herein for the purpose of alleging forfeiture pursuant to 21 U.S.C. § 853 .

24 Pursuant to 21 U.S.C. § 853, and upon conviction of one or more of the offenses alleged  
25 in this Indictment, any property, real or personal, that constitutes, or is derived from, or is traceable to  
26 the proceeds obtained directly or indirectly from the commission of the criminal conduct, or scheme, or  
27 conspiracy alleged in this Indictment; or that is used or is intended to be used to facilitate or used  
28 commit the criminal conduct, or scheme, or conspiracy alleged in this Indictment; or is involved in or

1 intended to be involved in the criminal conduct, or scheme, or conspiracy alleged in this Indictment; or  
2 any property traceable to such property, shall be forfeited to the United States, including but not limited  
3 to the following:

- 4 a. Approximately \$949,073.31 in U.S. Currency seized from Wells Fargo Bank account  
5 number 1737876043 in the name of Yousef D. Aezah dba YDA Solutions;
- 6 b. Approximately \$94,880.00 in U.S. Currency;
- 7 c. One Jimenez Firearms Inc. .9mm firearm serial number 252324;
- 8 d. One AR-15 rifle with no serial number;
- 9 e. Two flash suppressors for AR-15 style rifle;
- 10 f. Five lower receivers for AR-15 style rifle;
- 11 g. Miscellaneous .9mm and .223 ammunition;
- 12 h. One industrial grade pill press;
- 13 i. 2014 Toyota Tacoma Truck, California License Plate 7R65524, VIN  
14 #3TMJU4GN1EM165769I;
- 15 j. 2015 Toyota Camry, No License Plate, VIN #4T1BF1FK4FU918269;
- 16 k. Approximately \$201,205.00 in U.S. Currency;
- 17 l. Approximately \$8,800.00 in U.S. Currency;
- 18 m. Approximately \$10,700.00 in U.S. Currency;
- 19 n. AK-47 style rifle, Serial #1K373097, Model SLR-95; and
- 20 o. Two high capacity rifle magazines.

21 Pursuant to 21 U.S.C. § 853, if any property subject to forfeiture, as a result of any act or  
22 omission of defendant(s) or agents of defendant(s) or upon direction by the defendant(s):

- 23 a. cannot be located upon the exercise of due diligence;
- 24 b. has been transferred or sold to, or deposited with, a  
25 third party;
- 26 c. has been placed beyond the jurisdiction of the court;
- 27 d. has been substantially diminished in value; or
- 28 e. has been commingled with other property which cannot

1 be divided without difficulty,

2 the United States of America shall be entitled to forfeiture of any other property of the  
3 defendants, up to the value of the property subject to forfeiture, including but not limited to a personal  
4 forfeiture money judgment, pursuant to Title 21, United States Code, Section 853(p).

5  
6 A TRUE BILL.

**/s/ Signature on file w/AUSA**

7  
8 FOREPERSON

9 BENJAMIN B. WAGNER  
10 United States Attorney

11 By: **KEVIN P. ROONEY for**

12 KIRK E. SHERRIFF  
13 Assistant United States Attorney  
14 Chief, Fresno Division  
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No. \_\_\_\_\_

**UNITED STATES DISTRICT COURT**

*Eastern District of California*

*Criminal Division*

**FILED**

**JUL 21 2016**

CLERK, U.S. DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA  
BY J. HELINGS  
DEPUTY CLERK

**THE UNITED STATES OF AMERICA**

vs.

YOUSEF DAHIFALLA AEZAH  
ADHIM DAHIFALLA AEZAH  
DIRAR DAHIFALLA AEZAH

**16 CR 000 107 DAD BAM**

INDICTMENT

**VIOLATION(S):** 21 U.S.C. § 846 and 841(a)(1), 841(b)(1)(C) & 856(a)- Conspiracy to Manufacture, Distribute, and Possess with the Intent to Distribute a Controlled Substance, and to Maintain Drug-Involved Premises; 21 U.S.C. § 841(a)(1) & 841(b)(1)(C)- Distribution of a Controlled Substance; 21 U.S.C. § 856(a)- maintaining a Drug Involved Premises; and 21 U.S.C. § 853-Criminal Forfeiture

*A true bill,*

*Foreman.*

*Filed in open court this \_\_\_\_\_ day*

*of \_\_\_\_\_, A.D. 20 \_\_\_\_\_*

*Clerk.*

*Bail, \$ \_\_\_\_\_*

**NO BAIL WARRANT**

*for each defendant*

*E. P. [Signature]*

AO 257 (Rev. 9/92)  YES: SAB conflict in USAO (before 01/01/13)  YES: SKO conflict in USAO (Before 4/12/10) PER 18 U.S.C. 3170

**DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION -- IN U.S. DISTRICT COURT**

BY  COMPLAINT  INFORMATION  INDICTMENT  
 SUPERSEDING: Case No.

**OFFENSE CHARGED**  
  
PLEASE SEE INDICTMENT  
  
 Petty  
 Minor  
 Misdemeanor  
 Felony  
  
Place of offense **Kern COUNTY** U.S.C. Citation **Please see Indictment**

Name of District Court, and/or Judge/Magistrate Judge Location (City)  
**EDCA**

**DEFENDANT -- U.S. vs.**  
**YOUSEF DAHIFALLA AEZAH**  
Address **16 CR 000 107 DAD BAM**  
Birth Date  Male  Alien  
 Female (if applicable)  
(Optional unless a juvenile)

**PROCEEDING**  
Name of Complainant Agency, or Person (& Title, if any)  
**DEA, Ryan Olson**  
 person is awaiting trial in another Federal or State Court, give name of court  
 this person/proceeding is transferred from another district per FRCrP  20  21  40. Show District  
 this is a reprosecution of charges previously dismissed which were dismissed on motion of:  
 U.S. Att'y  Defense } **SHOW DOCKET NO.**  
 this prosecution relates to a pending case involving this same defendant  
 prior proceedings or appearance(s) before U.S. Magistrate Judge regarding this defendant were recorded under **MAGISTRATE JUDGE CASE NO.**

**DEFENDANT**  
**IS NOT IN CUSTODY**  
1)  Has not been arrested, pending outcome of this proceeding  
If not detained, give date any prior summons was served on above charges  
2)  Is a Fugitive  
3)  Is on Bail or Release from (show District)  
**IS IN CUSTODY**  
4)  On this charge  
5)  On another conviction  
6)  Awaiting trial on other charges }  Fed'l  State  
If answer to (6) is "Yes," show name of institution  
  
Has detainer been filed?  Yes  No } If "Yes," give date filed  
Mo. Day Year  
**DATE OF ARREST**  
Or ... if Arresting Agency & Warrant were not Federal  
Mo. Day Year  
**DATE TRANSFERRED TO U.S. CUSTODY**

Name and Office of Person Furnishing Information on THIS FORM **MICHELLE HOLLIDAY**

U.S. Att'y  Other U.S. Agency  
Name of Asst. U.S. Att'y (if assigned) **GRANT B. RABENN**

FORFEITURE ALLEGATION

This report amends AO 257 previously submitted  
**ADDITIONAL INFORMATION OR COMMENTS**

PLEASE ISSUE NO BAIL WARRANT

  
AUSA INITIALS

**PENALTY SLIP**

**DEFENDANT:** Yousef AEZAH

**COUNT ONE:**

**VIOLATION:** 21 U.S.C. § 846 and 841(a)(1) & (b)(1)(C) -  
Conspiracy to Distribute a Controlled  
Substance

**PENALTY:** 20 Years Imprisonment  
\$1,000,000 Criminal Fine  
Mandatory 3 Years Supervised Release

**COUNT TWO:**

**VIOLATION:** 21 U.S.C. § 841(a)(1) & (b)(1)(C) -  
Distribution of a Controlled Substance

**PENALTY:** 20 Years Imprisonment  
\$1,000,000 Criminal Fine  
Mandatory 3 Years Supervised Release

**COUNT THREE:**

**VIOLATION:** 21 U.S.C. § 856(a)(1), (b) - Maintaining a  
Drug-Involved Premises

**PENALTY:** 20 Years Imprisonment  
\$500,000 Criminal Fine  
Supervised Release of not More than 3 Years

**FORFEITURE ALLEGATION:**

21 U.S.C. § 853(a) - Criminal Forfeiture



AO 257 (Rev. 9/92)  YES: SAB conflict in USAO (before 01/01/13)  YES: SKO conflict in USAO (Before 4/12/10) PER 18 U.S.C. 3170

**DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION -- IN U.S. DISTRICT COURT**

BY  COMPLAINT  INFORMATION  INDICTMENT  
 SUPERSEDING: Case No.

Name of District Court, and/or Judge/Magistrate Judge Location (City)  
EDCA

**OFFENSE CHARGED**  
  
PLEASE SEE INDICTMENT  
  
 Petty  
 Minor  
 Misdemeanor  
 Felony  
  
Place of offense Kern COUNTY  
U.S.C. Citation Please see Indictment

**DEFENDANT -- U.S. vs.**  
**ADHIM DAHIFALLA AEZAH**  
Address **1: 16 CR 000 107 DAD BAM**  
Birth Date  Male  Alien  
 Female (if applicable)  
(Optional unless a juvenile)

**PROCEEDING**  
Name of Complainant Agency, or Person (& Title, if any)  
**DEA, Ryan Olson**  
 person is awaiting trial in another Federal or State Court, give name of court  
 this person/proceeding is transferred from another district per FRCrP  20  21  40. Show District  
 this is a reprosecution of charges previously dismissed which were dismissed on motion of:  
 U.S. Att'y  Defense } SHOW DOCKET NO.  
 this prosecution relates to a pending case involving this same defendant  
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3)  Is on Bail or Release from (show District)  
**IS IN CUSTODY**  
4)  On this charge  
5)  On another conviction  
6)  Awaiting trial on other charges }  Fed'l  State  
If answer to (6) is "Yes," show name of institution  
  
Has detainer been filed?  Yes  No } If "Yes," give date filed  
Mo. Day Year  
**DATE OF ARREST**   
Or... if Arresting Agency & Warrant were not Federal  
Mo. Day Year  
**DATE TRANSFERRED TO U.S. CUSTODY**

Name and Office of Person Furnishing Information on THIS FORM MICHELLE HOLLIDAY  
 U.S. Att'y  Other U.S. Agency

Name of Asst. U.S. Att'y (if assigned) GRANT B. RABENN  
 FORFEITURE ALLEGATION

ADDITIONAL INFORMATION OR COMMENTS

PLEASE ISSUE NO BAIL WARRANT

  
AUSA INITIALS

**PENALTY SLIP**

**DEFENDANT: ADHIM AEZAH**

**COUNT ONE:**

**VIOLATION:** 21 U.S.C. § 846 and 841(a)(1) & (b)(1)(C) -  
Conspiracy to Distribute a Controlled  
Substance

**PENALTY:** 20 Years Imprisonment  
\$1,000,000 Criminal Fine  
Mandatory 3 Years Supervised Release

**COUNT TWO:**

**VIOLATION:** 21 U.S.C. § 841(a)(1) & (b)(1)(C) -  
Distribution of a Controlled Substance

**PENALTY:** 20 Years Imprisonment  
\$1,000,000 Criminal Fine  
Mandatory 3 Years Supervised Release

**COUNT THREE:**

**VIOLATION:** 21 U.S.C. § 856(a)(1), (b) - Maintaining a  
Drug-Involved Premises

**PENALTY:** 20 Years Imprisonment,  
\$500,000 Criminal Fine  
Supervised Release of not More than 3 Years

**FORFEITURE ALLEGATION:**

21 U.S.C. § 853(a) - Criminal Forfeiture

AO 257 (Rev. 9/92)  YES: SAB conflict in USAO (before 01/01/13)  YES: SKO conflict in USAO (Before 4/12/10) PER 18 U.S.C. 3170

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BY  COMPLAINT  INFORMATION  INDICTMENT  
 SUPERSEDING: Case No.

Name of District Court, and/or Judge/Magistrate Judge Location (City)  
EDCA

**OFFENSE CHARGED**

PLEASE SEE INDICTMENT

- Petty
- Minor
- Misdemeanor
- Felony

Place of offense **Kern COUNTY** U.S.C. Citation  
Please see Indictment

**DEFENDANT -- U.S. vs.**  
**DIRAR DAHIFALLA AEZAH**

Address **7: 1 6 CR 0 0 0 1 0 7 DAD BAM**

Birth Date  Male  Alien  
 Female (if applicable)

(Optional unless a juvenile)

**PROCEEDING**

Name of Complainant Agency, or Person (& Title, if any)  
**DEA, Ryan Olson**

- person is awaiting trial in another Federal or State Court, give name of court
- this person/proceeding is transferred from another district per FRCrP  20  21  40. Show District
- this is a reprosecution of charges previously dismissed which were dismissed on motion of:
  - U.S. Att'y
  - Defense
- this prosecution relates to a pending case involving this same defendant
- prior proceedings or appearance(s) before U.S. Magistrate Judge regarding this defendant were recorded under

SHOW DOCKET NO.

MAGISTRATE JUDGE CASE NO.

Name and Office of Person Furnishing Information on THIS FORM  
**MICHELLE HOLLIDAY**

U.S. Att'y  Other U.S. Agency

Name of Asst. U.S. Att'y (if assigned) **GRANT B. RABENN**

FORFEITURE ALLEGATION

**DEFENDANT**

**IS NOT IN CUSTODY**

- 1)  Has not been arrested, pending outcome of this proceeding  
If not detained, give date any prior summons was served on above charges
- 2)  Is a Fugitive
- 3)  Is on Bail or Release from (show District)

**IS IN CUSTODY**

- 4)  On this charge
- 5)  On another conviction
- 6)  Awaiting trial on other charges }  Fed'l  State  
If answer to (6) is "Yes," show name of institution

Has detainer been filed?  Yes  No  
If "Yes," give date filed  
Mo. Day Year

**DATE OF ARREST**

Or ... if Arresting Agency & Warrant were not Federal  
Mo. Day Year

**DATE TRANSFERRED TO U.S. CUSTODY**

This report amends AO 257 previously submitted

**ADDITIONAL INFORMATION OR COMMENTS**

PLEASE ISSUE NO BAIL WARRANT



AUSA INITIALS

**PENALTY SLIP**

**DEFENDANT: DIRAR AEZAH**

**COUNT ONE:**

**VIOLATION:** 21 U.S.C. § 846 and 841(a)(1) & (b)(1)(C) -  
Conspiracy to Distribute a Controlled  
Substance

**PENALTY:** 20 Years Imprisonment  
\$1,000,000 Criminal Fine  
Mandatory 3 Years Supervised Release

**COUNT TWO:**

**VIOLATION:** 21 U.S.C. § 841(a)(1) & (b)(1)(C) -  
Distribution of a Controlled Substance

**PENALTY:** 20 Years Imprisonment  
\$1,000,000 Criminal Fine  
Mandatory 3 Years Supervised Release

**COUNT THREE:**

**VIOLATION:** 21 U.S.C. § 856(a)(1), (b) - Maintaining a  
Drug-Involved Premises

**PENALTY:** 20 Years Imprisonment  
\$500,000 Criminal Fine  
Supervised Release of not More than 3 Years

**FORFEITURE ALLEGATION:**

21 U.S.C. § 853(a) - Criminal Forfeiture