

FILED
U.S. DISTRICT COURT
EASTERN DISTRICT OF LA. 92

2018 SEP -7 A 11:18

WILLIAM W. ELEVINS
CLERK

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

FELONY

INDICTMENT FOR TRAFFICKING IN
COUNTERFEIT GOODS AND NOTICE OF FORFEITURE

UNITED STATES OF AMERICA	*	CRIMINAL NO. 18 - 191
v.	*	SECTION: SECT. A MAG. 2
MAHER SALIM	*	VIOLATIONS: 18 U.S.C. § 2320(a)(1)
a/k/a Maher Salem	*	18 U.S.C. § 2320(b)(1)(A)
a/k/a Mike Salem	*	18 U.S.C. § 2

* * *

The Grand Jury charges that:

COUNT 1

Beginning at a time unknown, and continuing until on or about January 19, 2017, in the Eastern District of Louisiana, the defendant, **MAHER SALIM a/k/a Maher Salem, a/k/a Mike Salem**, intentionally did traffic and attempt to traffic in goods, namely blue jeans, purses, pocketbooks, jogging suits, wallets, shoes, and hats, while knowingly using on and in connection with such goods, counterfeit marks, which marks were in use and were registered for those goods on the principal register of the United States Patent and Trademark Office, including the following:

X Fee USA
Process _____
X Dkt'd _____
CtRmDep _____
Doc. No. _____

- 111 pair of “True Religion” jeans
- 50 pair of “Rock Revival” jeans
- 8 “Michael Kors” purses
- 19 “Coach” wallets
- 2 “Michael Kors” wallets
- 8 “Louis Vutton” purses
- 6 “Gucci” purses
- 177 “Polo” sweatshirts
- 41 pair of “Polo” sweatpants
- 24 “Polo” jogging suits
- 44 pair of “Timberland” boots
- 336 “New Era” hats
- 473 pair of “Nike” shoes
- 21 “Adidas” jogging suits
- 114 pair of “Adidas” shoes
- 6 bottles “Dolce & Gabbana” perfume
- 110 “Mitchell & Ness” hats
- 24 “North Face” vests; and
- 43 “Nike” hats

which counterfeit marks were identical with and substantially indistinguishable from genuine marks in use and registered for those goods on the principal register in the United States Patent

and Trademark Office, and the use of which counterfeit marks was likely to cause confusion, to cause mistake, and to deceive, in violation of Title 18, United States Code, Sections 2320(a)(1) and 2.

NOTICE OF FORFEITURE

1. The allegations of Count 1 of this Indictment are realleged and incorporated by reference as though set forth fully herein for the purpose of alleging forfeiture to the United States of America pursuant to the provisions of Title 18, United States Code, Sections 2320 and 2323.

2. As a result of the offenses alleged in Count 1, defendant, **MAHER SALIM (a/k/a Maher Salem, a/k/a Mike Salem)**, shall forfeit to the United States pursuant to Title 18, United States Code, Section 2323(b), any property subject to forfeiture pursuant to violations of Title 18, United States Code, Section 2320.

3. If any of the above 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 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;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of said defendant up to the value of the above forfeitable property.

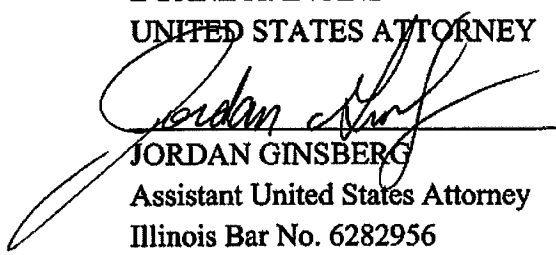
All in violation of Title 18, United States Code, Section 2323.

A TRUE BILL:



FOREPERSON

DUANE A. EVANS
UNITED STATES ATTORNEY



JORDAN GINSBERG
Assistant United States Attorney
Illinois Bar No. 6282956

New Orleans, Louisiana
September 7, 2018