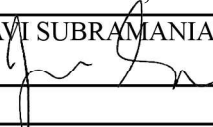


Presented to the Court by the foreman of the  
Grand Jury in open Court, in the presence  
of the Grand Jury and FILED in the U.S.  
DISTRICT COURT at Seattle, Washington

June 12, 2024

RAVI SUBRAMANIAN, Clerk

By  Deputy

UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff,

v.

DUNIA ALMEZAL,  
LAYLA ALMANSURI,  
SHAHAD ALMANSURI,  
RAGHAD ALMANSURI, and  
NEJOOM ALMANSURI,

Defendants.

NO. CR24-101 RSL

INDICTMENT

The Grand Jury charges that:

**COUNT 1**

**(Conspiracy to Commit Mail Fraud)**

1. Beginning in or about March 2022, and continuing until the present, in  
Snohomish County, within the Western District of Washington, and elsewhere, DUNIA  
ALMEZAL, LAYLA ALMANSURI, SHAHAD ALMANSURI, RAGHAD  
ALMANSURI, and NEJOOM ALMANSURI (the “DEFENDANTS”), together and with  
others known and unknown, conspired, confederated and agreed to commit the offense of  
Mail Fraud in violation of Title 18, United States Code, Section 1341. That is, the

1 DEFENDANTS, with intent to defraud, knowingly devised a scheme and artifice to  
2 defraud, and to obtain money and property by means of materially false and fraudulent  
3 pretenses, representations, promises, and omissions, and for the purpose of executing and  
4 attempting to execute the scheme and artifice to defraud, did knowingly cause  
5 merchandise to be delivered by mail and private and commercial interstate carrier.

6 **A. The Scheme to Defraud**

7 2. At all relevant times, Victim Company (“VC”) was a retailer with more than  
8 700 stores throughout the United States and around the world. VC sells its products in its  
9 brick-and-mortar stores and online.

10 3. At all times relevant to this Indictment, the DEFENDANTS used a Fast Track  
11 Return (“FTR”) policy offered by VC, through which customers could return  
12 merchandise via mail and obtain refunds within two hours. Specifically, customers could  
13 request return shipping labels through their online accounts to return up to three items at  
14 a time. After customers scanned these return labels at a post office, VC would provide  
15 refunds through electronic gift cards sent to the email address associated with the  
16 particular order within approximately two hours. As a result, VC issued refunds prior to  
17 receiving any actual returned merchandise.

18 4. The essence of the scheme and artifice to defraud was for the DEFENDANTS  
19 to purchase VC merchandise online, causing such merchandise to be delivered via the  
20 mails, and then obtain duplicate refunds for that same merchandise, first by obtaining a  
21 refund through VC’s FTR policy by scanning return shipping labels for the VC  
22 merchandise at the post office without actually mailing the merchandise back to VC for  
23 return, and second, by returning this same merchandise—for which an FTR refund had  
24 already been obtained—to brick-and-mortar VC stores to obtain another fraudulent  
25 refund.

26 **B. Manner and Means**

27 5. It was part of the scheme and artifice to defraud that the DEFENDANTS

1 purchased items online from VC using gift cards several times each week, on average, to  
2 be delivered via the mails to the DEFENDANTS' residences, all within the Western  
3 District of Washington:

- 4 • DUNIA ALMEZAL resides in Marysville, WA ("Subject Premises 1");
- 5 • LAYLA ALMANSURI resides in Stanwood, WA ("Subject Premises 2");
- 6 • SHAHAD ALMANSURI resides in Marysville, WA ("Subject Premises 3"); and
- 7 • RAGHAD ALMANSURI and NEJOOM ALMANSURI reside in Marysville, WA ("Subject Premises 4").

8 6. It was part of the scheme and artifice to defraud that before the items were  
9 delivered to their residences, the DEFENDANTS submitted to VC requests online for  
10 return labels for the items purchased, pursuant to the FTR policy. VC then emailed digital  
11 return labels to the email addresses provided.

12 7. It was part of the scheme and artifice to defraud that the DEFENDANTS  
13 printed the return labels, took them to the postal office, and scanned the barcodes using  
14 the self-service kiosk as though the items listed in the return labels were to be mailed.  
15 The DEFENDANTS did not, however, mail back the items on the scanned return labels  
16 at the post office.

17 8. It was part of the scheme and artifice to defraud that within two hours of the  
18 return labels being scanned at the postal office, the DEFEDANTS would receive  
19 electronic gift cards that were issued to the same email address in the amount of the  
20 refunded items, pursuant to VC's FTR policy.

21 9. It was part of the scheme and artifice to defraud that after the items were  
22 delivered to their residences, the DEFENDANTS took the items to brick-and-mortar VC  
23 stores to conduct physical returns of the items and obtain a second refund for the items.  
24 The DEFENDANTS traveled individually and with each other to conduct returns in VC  
25 stores located in Arizona, California, Colorado, Florida, Michigan, Nevada, and Oregon,  
26 as well as Washington. The VC stores refunded the cost of the items to various debit  
27

1 cards. Through this scheme, the conspirators purchased merchandise from VC using gift  
2 cards and obtained refunds for the same merchandise twice.

3 10. It was part of the scheme and artifice to defraud that the DEFENDANTS  
4 conducted hundreds of online purchases of VC items, at a rate of several purchases a  
5 week on average, over the course of the last two years and continuing through the  
6 present. Oftentimes even before the VC items were delivered, the DEFENDANTS  
7 requested return labels and scanned the labels at post offices to obtain refunds.

8 11. It was part of the scheme and artifice to defraud that when the VC orders were  
9 delivered to the DEFENDANTS' homes, they returned them in VC stores. Most of the  
10 physical returns were made at VC stores outside of Washington State.

11 12. It was part of the scheme and artifice to defraud that the DEFENDANTS  
12 purchased roundtrip flights for each other to return VC merchandise in other states. They  
13 traveled together to return merchandise that had already been scanned for return at post  
14 offices.

15 13. It was part of the scheme and artifice to defraud that the DEFENDANTS  
16 transferred some of the fraudulent proceeds as payments or "cuts" between themselves,  
17 as demonstrated by various Zelle payments of several hundred dollars between LAYLA  
18 ALMANSURI and RAGHAD ALMANSURI, titled as "Your Cut," "Cut and Bags,"  
19 "Dee cut," "Dunia's Cut," and "Dee Cut From Today and Yesterday."

20 14. It was part of the scheme and artifice to defraud that the DEFENDANTS were  
21 responsible for at least \$1,000,000 worth of fraudulently induced refunds from VC from  
22 March 2022 through May 2024.

23 All in violation of Title 18, United States Code, Section 1349.

24 **COUNTS 2-25**

25 **(Mail Fraud)**

26 15. The Grand Jury incorporates by reference Paragraphs 1-14 of this Indictment  
27 as if fully set forth herein.

16. Beginning in or about March 2022, and continuing until the present, in Snohomish County, within the Western District of Washington, and elsewhere, DUNIA ALMEZAL, LAYLA ALMANSURI, SHAHAD ALMANSURI, RAGHAD ALMANSURI, and NEJOOM ALMANSURI, together and with others known and unknown, with intent to defraud, knowingly devised a scheme and artifice to defraud, and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, and omissions.

17. On or about the dates set forth below, for the purpose of executing and attempting to execute this scheme and artifice to defraud, the DEFENDANTS did knowingly cause, and did aid and abet the causing of, merchandise to be delivered by mail and private and commercial interstate carrier, as specified below, with each instance constituting a separate count of this Indictment:

Count	Delivery Date	Mailing
2	3/29/2023	Online order by DUNIA ALMEZAL for merchandise to be delivered to her home address, SUBJECT PREMISES 1, via FedEx, tracking number 638307240150.
3	4/2/2023	Online order by DUNIA ALMEZAL for merchandise to be delivered to her home address, SUBJECT PREMISES 1, via FedEx, tracking number 638307557988.
4	4/3/2023	Online order by DUNIA ALMEZAL for merchandise to be delivered to her home address, SUBJECT PREMISES 1, via FedEx, tracking number 638307667514.
5	4/12/2023	Online order by DUNIA ALMEZAL for merchandise to be delivered to her home address, SUBJECT PREMISES 1, via FedEx, tracking number 638308589898.
6	4/14/2023	Online order by DUNIA ALMEZAL for merchandise to be delivered to her home address, SUBJECT PREMISES 1, via FedEx, tracking number 638308742370.

Count	Delivery Date	Mailing
7	3/29/2023	Online order by LAYLA ALMANSURI for merchandise to be delivered to her home address, SUBJECT PREMISES 2, via FedEx, tracking number 638307132880.

Count	Delivery Date	Mailing
8	4/2/2023	Online order by LAYLA ALMANSURI for merchandise to be delivered to her home address, SUBJECT PREMISES 2, via FedEx, tracking number 638307547770.
9	4/2/2023	Online order by LAYLA ALMANSURI for merchandise to be delivered to her home address, SUBJECT PREMISES 2, via FedEx, tracking number 638307573355.
10	4/6/2023	Online order by LAYLA ALMANSURI for merchandise to be delivered to her home address, SUBJECT PREMISES 2, via FedEx, tracking number 638307889363.
11	4/8/2023	Online order by LAYLA ALMANSURI for merchandise to be delivered to her home address, SUBJECT PREMISES 2, via FedEx, tracking number 638308069712.

Count	Delivery Date	Mailing
12	4/5/23	Online order by SHAHAD ALMANSURI for merchandise to be delivered to her home address, SUBJECT PREMISES 3, via FedEx, tracking number 63461738544.
13	4/10/23	Online order by SHAHAD ALMANSURI for merchandise to be delivered to her home address, SUBJECT PREMISES 3, via FedEx, tracking number 638308253145.
14	4/12/2023	Online order by SHAHAD ALMANSURI for merchandise to be delivered to her home address, SUBJECT PREMISES 3, via FedEx, tracking number 638308552401.
15	4/14/2023	Online order by SHAHAD ALMANSURI for merchandise to be delivered to her home address, SUBJECT PREMISES 3, via FedEx, tracking number 638308693106.
16	4/16/2023	Online order by SHAHAD ALMANSURI for merchandise to be delivered to her home address, SUBJECT PREMISES 3, via FedEx, tracking number 638309037209.
17	4/29/2023	Online order by SHAHAD ALMANSURI for merchandise to be delivered to her home address, SUBJECT PREMISES 3, via FedEx, tracking number 638310344772.

Count	Delivery Date	Mailing
18	3/29/2023	Online order by RAGHAD ALMANSURI for merchandise to be delivered to her home address, SUBJECT PREMISES 4, via FedEx, tracking number 638307230089.



Count	Delivery Date	Mailing
19	5/3/2023	Online order by RAGHAD ALMANSURI for merchandise to be delivered to her home address, SUBJECT PREMISES 4, via FedEx, tracking number 638310726719.
20	5/4/2023	Online order by RAGHAD ALMANSURI for merchandise to be delivered to her home address, SUBJECT PREMISES 4, via FedEx, tracking number 638310801545.

Count	Delivery Date	Mailing
21	3/24/2023	Online order by NEJOOM ALMANSURI for merchandise to be delivered to her home address, SUBJECT PREMISES 4, via FedEx, tracking number 638306804519.
22	3/26/2023	Online order by NEJOOM ALMANSURI for merchandise to be delivered to her home address, SUBJECT PREMISES 4, via FedEx, tracking number 638306978947.
23	3/29/2023	Online order by NEJOOM ALMANSURI for merchandise to be delivered to her home address, SUBJECT PREMISES 4, via FedEx, tracking number 638307145674.
24	4/5/2023	Online order by NEJOOM ALMANSURI for merchandise to be delivered to her home address, SUBJECT PREMISES 4, via FedEx, tracking number 638307792183.
25	4/7/2023	Online order by NEJOOM ALMANSURI for merchandise to be delivered to her home address, SUBJECT PREMISES 4, via FedEx, tracking number 638308056447.

It is further alleged that each of the above offenses was committed during and in furtherance of, and was a foreseeable part of, the conspiracy charged in Count 1 of this Indictment.

All in violation of Title 18, United States Code, Section 1341 and Section 2.

### **FORFEITURE ALLEGATION**

The allegations contained in Counts 1 - 25 of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture. Upon conviction of any of the offenses alleged in Counts 1 - 25, Defendants DUNIA ALMEZAL, LAYLA ALMANSURI, SHAHAD ALMANSURI, RAGHAD ALMANSURI, and NEJOOM

1 ALMANSURI shall forfeit to the United States any property constituting or derived from  
2 proceeds traceable to the offense. All such property is forfeitable pursuant to Title 18,  
3 United States Code, Section 981(a)(1)(C), by way of Title 28, United States Code,  
4 Section 2461(c), and includes but is not limited to a sum of money reflecting the proceeds  
5 the Defendant obtained as result of the offense.

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1 **Substitute Assets.** If any of the above-described forfeitable property, as a result of any  
2 act or omission of the defendant,

- 3 a. cannot be located upon the exercise of due diligence;  
4 b. has been transferred or sold to, or deposited with, a third party;  
5 c. has been placed beyond the jurisdiction of the Court;  
6 d. has been substantially diminished in value; or,  
7 e. has been commingled with other property which cannot be divided  
8 without difficulty,

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

12  
13 A TRUE BILL: *yes*  
14 DATED: *6/12/2024*

15 *Signature of Foreperson redacted pursuant*  
16 *to the policy of the Judicial Conference of*  
17 *the United States.*

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19  
20 FOREPERSON

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22  
23   
24 TESSA M. GORMAN  
25 United States Attorney

26  
27   
28 AMY JAQUETTE  
29 Assistant United States Attorney

30  
31   
32 RACHEL YEMINI  
33 Assistant United States Attorney