

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION

UNITED STATES OF AMERICA

v.

CASE NO. 8:14 CR 185 T 23 MAP

ALI EL KHATEEB,
ALA EDDIN M. KHALED,
GEORGE CHALLITA, and
ANWAR GABER

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

INDICTMENT

SEALED

The Grand Jury charges:

COUNT ONE

From on or about March 1, 2011 through on or about July 8, 2012, in the
Middle District of Florida and elsewhere, the defendants,

ALI EL KHATEEB,
ALA EDDIN M. KHALED, and
GEORGE CHALLITA

did knowingly and willfully conspire and agree with each other and with others both
known and unknown to the Grand Jury to distribute and possess with intent to
distribute, for human consumption, a quantity of a mixture and substance
containing a detectable amount of AM-2201, a controlled substance analogue,
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).

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SEALED

COUNT TWO

From on or about March 1, 2011 through on or about July 8, 2012, in the Middle District of Florida and elsewhere, the defendants,

ALI EL KHATEEB,
ALA EDDIN M. KHALED, and
GEORGE CHALLITA

did knowingly and intentionally distribute and possess with intent to distribute, and aid and abet each other in distributing and in possessing with intent to distribute, for human consumption, a quantity of a mixture and substance containing a detectable amount AM-2201, a controlled substance analogue.

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.

COUNT THREE

From on or about May 16, 2013 continuing through the date of this indictment, in the Middle District of Florida and elsewhere, the defendants,

ALI EL KHATEEB,
ALA EDDIN M. KHALED, and
ANWAR GABER

did knowingly and willfully conspire and agree with each other and with others both known and unknown to the Grand Jury to distribute and possess with intent to distribute, a Schedule I controlled substance XLR-11, contrary to the provisions of Title 21, United States Code Section 841(a)(1).

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

COUNT FOUR

From on or about May 16, 2013, through at least on or about September 30, 2013 in the Middle District of Florida and elsewhere, the defendants,

ALI EL KHATEEB,
ALA EDDIN M. KHALED, and
ANWAR GABER

did knowingly and intentionally distribute and possess with intent to distribute, and aid and abet each other in distributing and in possessing with intent to distribute XLR-11 , a Schedule I controlled substance.

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

FORFEITURES

1. The allegations contained in Counts One through Four 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 through Four of this Indictment, punishable by imprisonment for more than one (1) year,

ALI EL KHATEEB,
ALA EDDIN M. KHALED,
GEORGE CHALLITA, and
ANWAR GABER

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 defendant 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 \$5,900,000.00, representing the proceeds of the offenses;
 - b. The contents of the following bank accounts, held in the name of B & B Distributors, LLC, which contain proceeds of, and constitute property intended to facilitate, the offenses in Counts Three, Four:
 - i. Bank of America Account number 229048484689;
 - ii. Bank of America Account number 229048484676;
 - iii. SunTrust Bank Account number 1000153663447; and
 - iv. Wells Fargo Bank Account number 5841884793;

- c. The real property located at 14655 SW 60th Terrace, Ocala, Florida, titled in the name of Patricia and Ali El-Khateeb, more specifically described as:

ALL THAT CERTAIN LAND SITUATE IN MARION COUNTY, FLORIDA, TO-WIT: LOT 10, BLOCK 1251 MARION OAKS UNIT NINE, ACCORDING TO THE MAP OR PLAT THEREOF AS RECORDED IN PLAT BOOK O, PAGE 164 THROUGH 193, PUBLIC RECORDS OF MARION COUNTY, FLORIDA,

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

- d. The real property located at 5703 Imperial Key, Tampa, Florida, held in the name of Amelia El-Khateeb, and more specifically described below:

LOT 49, TAMPA SHORES UNIT NO. 7, ACCORDING TO THE MAP OR PLAT THEREOF, AS RECORDED IN PLAT BOOK 43, PAGE(S) 39, OF THE PUBLIC RECORDS OF

HILLSBOROUGH COUNTY, FLORIDA

LESS AND EXCEPT THE FOLLOWING PORTION OF SAID LOT 49: BEGIN AT THE WESTERNMOST CORNER OF SAID LOT 49 FOR A POINT OF BEGINNING, THENCE NORTH

36 DEGREES 05 MINUTES 00 SECONDS EAST A DISTANCE OF 18.18 FEET; THENCE SOUTH 53 DEGREES 51 MINUTES 00 SECONDS EAST A DISTANCE OF 101.77 FEET TO

A POINT ON A CURVE, SAID POINT BEING ON THE WESTERN RIGHT OF WAY BOUNDARY OF IMPERIAL KEY (50 FOOT ROAD DEDICATION); THENCE ON AN ARC TO THE

LEFT IN A SOUTHERLY DIRECTION ALONG STATED WESTERLY RIGHT OF WAY BOUNDARY OF IMPERIAL KEY A DISTANCE OF 26.04 FEET WITH A RADIUS OF 50 FEET

SUBTENDED BY A CHORD OF 25.75 FEET, CHORD BEARING SOUTH 08 DEGREES 55 MINUTES 46 SECONDS EAST TO A POINT ON A CURVE; THENCE NORTH 53 DEGREES 51 MINUTES 00 SECONDS WEST A DISTANCE OF 120 FEET TO THE POINT OF BEGINNING,

which was used and intended to be used to facilitate the offenses charged in Counts Three, and Four.

4. If any of the property described above as being 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, 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.

5. The substitute assets subject to forfeiture include, but are not limited to:

- a. The following bank accounts:

- i. SunTrust Bank account number 1000113928609, held in the name of Ali Elkhateeb;
 - ii. SunTrust Bank account number 1000139181068, held in the name of Ali Elkhateeb;
 - iii. Capital One Bank Account number 5627839288, held in the name of Anwar Gaber or Manar Gaber; and
 - iv. Fifth Third Bank Account number 7422097639, held in the name of Ali Elkhateeb;
- b. The following pieces of real property:
 - i. 9813 Sorbonne Loop, Seffner, Florida, held in the name of 1 ICON Invest Land Trust;
 - ii. 18112 Sweet Jasmine Drive, Tampa, Florida, held in the Name of Sweet Jasmine LT, LLC;
 - iii. Lots 25 and 26 SW 106th Place Ocala, Florida, held in the name of Amelia Elkhateeb;
 - iv. Lots 36 & 37 Silver Spring Shores Number 7, Ocala, Florida, held in the name of Amelia Elkhateeb;
 - v. 13235 SE 110th Ct Ocklawaha, Florida, held in the name of TGM Investment Group, LLC; and
 - vi. 4935 NE 25th Ave, Ocala Florida, held in the name of TGM Investment Group, LLC;
- c. The following pieces of real property, held in the name of nominee ICON Real Estate Investments, LLC:
 - i. 10830 SE 90th Court, Ocala, Florida;
 - ii. 19 Almond Trail, Ocala, Florida;
 - iii. 2020 NE 41st Street, Ocala, Florida
 - iv. 11 Locust Circle, Ocala, Florida;

- v. 3405 NE 45th Street, Ocala, Florida;
- vi. 32 Water Track Drive, Ocala, Florida;
- vii. 5417 NW 55th Place, Ocala, Florida;
- viii. 3 Oak Trail, Ocala, Florida;
- ix. 6080 NW 67th Avenue Road, Ocala, Florida;
- x. 3000 NE 43rd Place Ocala, Florida;
- xi. 10 Hemlock Terrace Pass, Ocala, Florida
- xii. 60 Silver Place Ocala, Florida;
- xiii. 10537 Coral Key Avenue, Tampa, Florida;
- xiv. 2810 NE 36th Street Ocala, Florida;
- xv. 61 Spring Loop Ocala, Florida;
- xvi. 8789 SE 89th Street, Ocala, Florida;
- xvii. 204 Marion Oaks Lane, Ocala, Florida;
- xviii. 14491 SW 41st Avenue Road, Ocala, Florida;
- xix. 10411 SW 42nd Avenue, Ocala, Florida;
- xx. 4097 SW 98th Street Ocala, Florida;
- xxi. 4190 SW 103rd Place, Ocala, Florida; and
- xxii. Lot 2 Ocala Waterway Estates, Ocala, Florida

- d. The following pieces of real property, held in the name of nominee JGM Investment Group, LLC:

- i. 3615 NE 19th Place, Ocala, Florida;
- ii. 3617 NE 19th Place, Ocala, Florida;
- iii. 10255 SE 158th Place, Ocala, Florida;
- iv. 1771 SE 39th Street, Ocala, Florida;
- v. 1130 NE 12th Street, Ocala, Florida;
- vi. 475 Water Lane, Ocala, Florida;
- vii. 14355 SE 60th Avenue, Ocala, Florida;

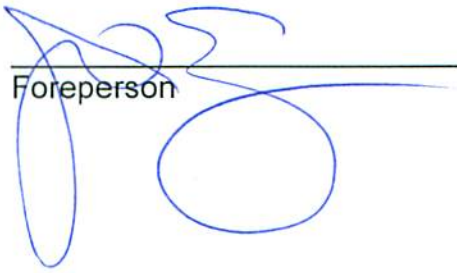
- viii. 3619 NE 19th Place, Ocala, Florida;
 - ix. 1655 NE 35th Street, Ocala, Florida;
 - x. 2585 NE 49th Place, Ocala, Florida;
 - xi. 22687 SW Rainbow Lakes Blvd, Dunnellon Florida;
 - xii. 23767 SW Rainbow lakes Blvd Ocala, Florida;
 - xiii. 14771 NE 113th Terrace, Fort Mc Coy, Florida;
 - xiv. 4501 NE 12th Street, Ocala, Florida;
 - xv. 2116 NE 39th Avenue, Ocala, Florida; and
 - xvi. 5510 SE 30th Avenue, Ocala, Florida;
- e. The following pieces of real property, held in the name of nominee APLT 11 LLC:
- i. 5725 SE 3rd Place, Ocala, Florida;
 - ii. 6395 NW 57th Avenue, Ocala, Florida;
 - iii. 1713 NE 29th Street, Ocala, Florida; and
 - iv. 44 Teak Course, Ocala, Florida;
- f. The following business and any and all of their assets:
- i. 36th Ave Raja Properties LLC;
 - ii. A-1 Food Mart of Ocala Inc.;
 - iii. APLT 11 LLC;
 - iv. APLT12 LLC ;
 - v. Assurance Real Estate Investments LLC;
 - vi. B & B Distributor LLC;
 - vii. Chacko And Co Inc.;
 - viii. Chevron of Ocala, Inc.;
 - ix. Country Food & Gas Inc.;

- x. Crescent City Phones LLC ;
- xi. Hari Krupa 11 Inc DBA Quick King Food Store;
- xii. Holy Land Fashion LLC;
- xiii. Icon Real Estate Investments LLC;
- xiv. Ideal Properties of Florida, LLC;
- xv. JGM Investment Group LLC;
- xvi. Luxury Concepts LLC;
- xvii. Moealzer Inc.;
- xviii. Murti Petroleum Three Inc. DBA Quick King Food Mart;
- xix. Murti Property's Inc. ;
- xx. Neelima Food Stores Inc.;
- xxi. Neelima Inc. DBA Paradise Bar and Lounge;
- xxii. Neelima Liquor Holdings Inc.;
- xxiii. Neelima Liquor Inc.;
- xxiv. Ocala Acres 1 LLC;
- xxv. Prayosha Inc. of Live Oak DBA Live Oak Liquors;
- xxvi. Sachi One Inc. Quick King Food Store # 12;
- xxvii. Sahil Food Mart Inc.;
- xxviii. Seven Gables Apartments & Investments, LLC;
- xxix. Shree Shiv Inc.;
- xxx. Shreeji Bapa Krupa LLC;
- xxxi. Shree Narayan Krupa One Inc. DBA Quick King Food Store;
- xxxii. Sweet Jasmine Lt LLC;
- xxxiii. T 47 Petro 2 Inc.;
- xxxiv. T 47 Petro 4 Inc.;
- xxxv. TGM Investment Group LLC;
- xxxvi. Tias Food Distributor, Inc.;
- xxxvii. Unifirst Fashions, Inc.;

- xxxviii. Wholesale and More LLC;
- xxxix. Research Enterprises USA One Inc.;
 - xl. Sr 52 Investment LLC;
 - xli. Shree Umiya Investment LLC;
 - xl.ii. Tyron Investment LLC;
 - xl.iii. Vrp, LLC;
 - xl.ii. Anupam Enterprises Inc.;
 - xl.ii. Dhruv Enterprises USA Inc.;
 - xl.ii. Varahi Enterprises Inc.;
 - xl.ii. Rightway Food Store;
 - xl.ii. Jnbk Investment LLC;
 - xl.ii. Om Subway Two Inc.;
 - l. Bellview One LLC;
 - li. Efytel, LLC;
 - lii. Forest City One LLC;
 - lii. Jax One Investments LLC;
 - lii. Newport Richey 1 LLC;
 - lii. Harileela Realestate LLC;
 - lii. Bartow 1 LLC;
 - lii. Orlando 11 LLC;
 - lii. Jnbk Investment LLC;
 - lii. Roma LLC;
 - lii. Dhruv 1 LLC;
 - lii. Maruti Real Estate Investments LLC;
 - lii. Lecanto One LLC;
 - lii. Hudson One LLC;
 - lii. Dhruv Management LLC;

- lxv. R & V Orlando LLC; and
- lxvi. Rasikp FI LLC.

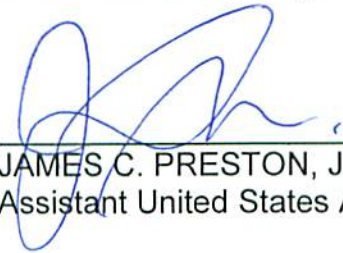
A TRUE BILL,



Foreperson

A. LEE BENTLEY, III
United States Attorney

By:



JAMES C. PRESTON, JR.
Assistant United States Attorney

By:



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

FORM OBD-34
APR 1991

No.

UNITED STATES DISTRICT COURT
Middle District of Florida
Tampa Division

THE UNITED STATES OF AMERICA

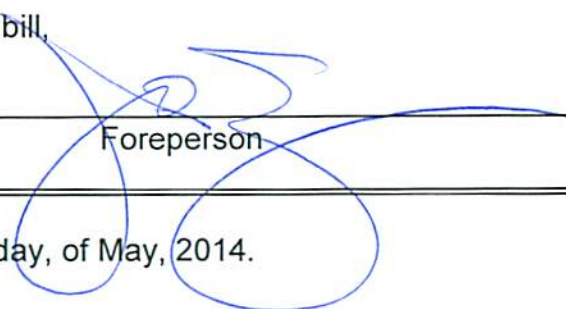
vs.

ALI EL KHATEEB,
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ANWAR GABER.

INDICTMENT

Violations: Title 21, United States Code, Sections 846, 841(a)(1), 802, 813, 841(b)(1)(C)

A true bill,



Foreperson

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

Clerk

Bail \$ _____
