

FILED/ENDORSED

MAR 18 2025

By L. Chen-Knapp, Deputy Clerk

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SACRAMENTO

PEOPLE OF THE STATE OF CALIFORNIA,

Plaintiff,

GJ Number: 25SP00001

Case No. 25FE004890

v.

~~PROPOSED~~ INDICTMENT

1. RAMZI IBRAHIM SABA,

2. OSAMA ZAKOUR,

3. BANAYOTIS REDA HADDAD

4. JOSEF FRIWAT

5. JERIES AYOUB DABABNEH

Defendants.

A Grand Jury of the County of Sacramento, State of California, hereby accuses by this Indictment, the following defendants of committing, in the Counties of Sacramento, San Bernardino, Los Angeles, San Diego and Riverside, the following crimes:

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1 **SOUTHERN CALIFORNIA TRADING GROUP, LLC**

2 **COUNT ONE**

3 **[UNLICENSED DISTRIBUTOR]**

4 On or about January 25, 2018, at and in the County of Riverside, State of California,
5 defendant BANAYOTIS HADDAD, being a person required to obtain a license as a distributor,
6 engaged in business as a distributor without a license, in violation of Revenue and Taxation Code
7 section 30149.

8 It is further alleged that defendant BANAYOTIS HADDAD acted with the intent to defeat
9 or evade an unreported tax liability exceeding twenty-five thousand dollars (\$25,000) within any
10 12-consecutive month period, in violation of Revenue and Taxation Code section 30480, a felony,
11 to wit: Failure to pay \$904,534 excise tax to the California Department of Tax and Fee
12 Administration.

13 It is further alleged that Sacramento County has jurisdiction in this count pursuant to
14 Penal Code section 781.

15
16 **COUNT TWO**

17 **[UNLICENSED DISTRIBUTOR]**

18 On or about February 25, 2018, at and in the County of Riverside, State of California,
19 defendant BANAYOTIS HADDAD, being a person required to obtain a license as a distributor,
20 engaged in business as a distributor without a license, in violation of Revenue and Taxation Code
21 section 30149.

22 It is further alleged that defendant BANAYOTIS HADDAD acted with the intent to defeat
23 or evade an unreported tax liability exceeding twenty-five thousand dollars (\$25,000) within any
24 12-consecutive month period, in violation of Revenue and Taxation Code section 30480, a felony,
25 to wit: Failure to pay \$814,890 excise tax to the California Department of Tax and Fee
26 Administration.

27 It is further alleged that Sacramento County has jurisdiction in this count pursuant to
28 Penal Code section 781.

1 **COUNT THREE**

2 **[UNLICENSED DISTRIBUTOR]**

3 On or about April 25, 2018, at and in the County of Riverside, State of California,
4 defendant BANAYOTIS HADDAD, being a person required to obtain a license as a distributor,
5 engaged in business as a distributor without a license, in violation of Revenue and Taxation Code
6 section 30149.

7 It is further alleged that defendant BANAYOTIS HADDAD acted with the intent to defeat
8 or evade an unreported tax liability exceeding twenty-five thousand dollars (\$25,000) within any
9 12-consecutive month period, in violation of Revenue and Taxation Code section 30480, a felony,
10 to wit: Failure to pay \$790,773 excise tax to the California Department of Tax and Fee
11 Administration.

12 It is further alleged that Sacramento County has jurisdiction in this count pursuant to
13 Penal Code section 781.

14
15 **COUNT FOUR**

16 **[UNLICENSED DISTRIBUTOR]**

17 On or about May 25, 2018, at and in the County of Riverside, State of California,
18 defendant BANAYOTIS HADDAD, being a person required to obtain a license as a distributor,
19 engaged in business as a distributor without a license, in violation of Revenue and Taxation Code
20 section 30149.

21 It is further alleged that defendant BANAYOTIS HADDAD acted with the intent to defeat
22 or evade an unreported tax liability exceeding twenty-five thousand dollars (\$25,000) within any
23 12-consecutive month period, in violation of Revenue and Taxation Code section 30480, a felony,
24 to wit: Failure to pay \$576,533 excise tax to the California Department of Tax and Fee
25 Administration.

26 It is further alleged that Sacramento County has jurisdiction in this count pursuant to
27 Penal Code section 781.

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COUNT FIVE

[UNLICENSED DISTRIBUTOR]

On or about June 25, 2018, at and in the County of Riverside, State of California, defendant BANAYOTIS HADDAD, being a person required to obtain a license as a distributor, engaged in business as a distributor without a license, in violation of Revenue and Taxation Code section 30149.

It is further alleged that defendant BANAYOTIS HADDAD acted with the intent to defeat or evade an unreported tax liability exceeding twenty-five thousand dollars (\$25,000) within any 12-consecutive month period, in violation of Revenue and Taxation Code section 30480, a felony, to wit: Failure to pay \$555,922 excise tax to the California Department of Tax and Fee Administration.

It is further alleged that Sacramento County has jurisdiction in this count pursuant to Penal Code section 781.

COUNT SIX

[UNLICENSED DISTRIBUTOR]

On or about July 25, 2018, at and in the County of Riverside, State of California, defendant BANAYOTIS HADDAD, being a person required to obtain a license as a distributor, engaged in business as a distributor without a license, in violation of Revenue and Taxation Code section 30149.

It is further alleged that defendant BANAYOTIS HADDAD acted with the intent to defeat or evade an unreported tax liability exceeding twenty-five thousand dollars (\$25,000) within any 12-consecutive month period, in violation of Revenue and Taxation Code section 30480, a felony, to wit: Failure to pay \$789,804 excise tax to the California Department of Tax and Fee Administration.

It is further alleged that Sacramento County has jurisdiction in this count pursuant to Penal Code section 781.

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1 **COUNT SEVEN**

2 **[UNLICENSED DISTRIBUTOR]**

3 On or about August 25, 2018, at and in the County of Riverside, State of California,
4 defendant BANAYOTIS HADDAD, being a person required to obtain a license as a distributor,
5 engaged in business as a distributor without a license, in violation of Revenue and Taxation Code
6 section 30149.

7 It is further alleged that defendant BANAYOTIS HADDAD acted with the intent to defeat
8 or evade an unreported tax liability exceeding twenty-five thousand dollars (\$25,000) within any
9 12-consecutive month period, in violation of Revenue and Taxation Code section 30480, a felony,
10 to wit: Failure to pay \$322,674 excise tax to the California Department of Tax and Fee
11 Administration.

12 It is further alleged that Sacramento County has jurisdiction in this count pursuant to
13 Penal Code section 781.

14
15 **COUNT EIGHT**

16 **[UNLICENSED DISTRIBUTOR]**

17 On or about September 25, 2018, at and in the County of Riverside, State of California,
18 defendant BANAYOTIS HADDAD, being a person required to obtain a license as a distributor,
19 engaged in business as a distributor without a license, in violation of Revenue and Taxation Code
20 section 30149.

21 It is further alleged that defendant BANAYOTIS HADDAD acted with the intent to defeat
22 or evade an unreported tax liability exceeding twenty-five thousand dollars (\$25,000) within any
23 12-consecutive month period, in violation of Revenue and Taxation Code section 30480, a felony,
24 to wit: Failure to pay \$173,754 excise tax to the California Department of Tax and Fee
25 Administration.

26 It is further alleged that Sacramento County has jurisdiction in this count pursuant to
27 Penal Code section 781.

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1 **COUNT NINE**

2 **[UNLICENSED DISTRIBUTOR]**

3 On or about October 25, 2018, at and in the County of Riverside, State of California,
4 defendant BANAYOTIS HADDAD, being a person required to obtain a license as a distributor,
5 engaged in business as a distributor without a license, in violation of Revenue and Taxation Code
6 section 30149.

7 It is further alleged that defendant BANAYOTIS HADDAD acted with the intent to defeat
8 or evade an unreported tax liability exceeding twenty-five thousand dollars (\$25,000) within any
9 12-consecutive month period, in violation of Revenue and Taxation Code section 30480, a felony,
10 to wit: Failure to pay \$292,326 excise tax to the California Department of Tax and Fee
11 Administration.

12 It is further alleged that Sacramento County has jurisdiction in this count pursuant to
13 Penal Code section 781.

14
15 **COUNT TEN**

16 **[UNLICENSED DISTRIBUTOR]**

17 On or about November 25, 2018, at and in the County of Riverside, State of California,
18 defendant BANAYOTIS HADDAD, being a person required to obtain a license as a distributor,
19 engaged in business as a distributor without a license, in violation of Revenue and Taxation Code
20 section 30149.

21 It is further alleged that defendant BANAYOTIS HADDAD acted with the intent to defeat
22 or evade an unreported tax liability exceeding twenty-five thousand dollars (\$25,000) within any
23 12-consecutive month period, in violation of Revenue and Taxation Code section 30480, a felony,
24 to wit: Failure to pay \$156,159 excise tax to the California Department of Tax and Fee
25 Administration.

26 It is further alleged that Sacramento County has jurisdiction in this count pursuant to
27 Penal Code section 781.

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1 **COUNT ELEVEN**

2 **[MONEY LAUNDERING]**

3 On or about January 8, 2018 through January 29, 2018, at and in the county of Riverside,
4 State of California, defendant BANAYOTIS HADDAD willfully and unlawfully conducted a
5 transaction involving a monetary instrument of a total value exceeding \$25,000, with the specific
6 intent to promote, manage, establish, or carry on, or facilitate the promotion, management,
7 establishment, or carrying on of any criminal activity in violation of Penal Code Section
8 186.10(a)(1), a felony, to wit: \$1,440,674.50 deposited into an account at Bank of America.

9 It is further alleged that Sacramento County has jurisdiction in this count pursuant to
10 Penal Code section 781.

11
12 **COUNT TWELVE**

13 **[MONEY LAUNDERING]**

14 On or about February 2, 2018 through February 21, 2018, at and in the county of
15 Riverside, State of California, defendant BANAYOTIS HADDAD willfully and unlawfully
16 conducted a transaction involving a monetary instrument of a total value exceeding \$25,000, with
17 the specific intent to promote, manage, establish, or carry on, or facilitate the promotion,
18 management, establishment, or carrying on of any criminal activity in violation of Penal Code
19 Section 186.10(a)(1), a felony, to wit: \$959,174.20 deposited into an account at Bank of America.

20 It is further alleged that Sacramento County has jurisdiction in this count pursuant to
21 Penal Code section 781.

22
23 **COUNT THIRTEEN**

24 **[MONEY LAUNDERING]**

25 On or about March 1, 2018, at and in the county of Riverside, State of California,
26 defendant BANAYOTIS HADDAD willfully and unlawfully conducted a transaction involving a
27 monetary instrument of a total value exceeding \$5,000, with the specific intent to promote,
28 manage, establish, or carry on, or facilitate the promotion, management, establishment, or

1 carrying on of any criminal activity in violation of Penal Code Section 186.10(a)(1), a felony, to
2 wit: \$273,464 deposited into an account at Bank of America.

3 It is further alleged that Sacramento County has jurisdiction in this count pursuant to
4 Penal Code section 781.

5
6 **COUNT FOURTEEN**

7 **[MONEY LAUNDERING]**

8 On or about April 10, 2018 through April 27, 2018, at and in the county of Riverside,
9 State of California, defendant BANAYOTIS HADDAD willfully and unlawfully conducted a
10 transaction involving a monetary instrument of a total value exceeding \$25,000, with the specific
11 intent to promote, manage, establish, or carry on, or facilitate the promotion, management,
12 establishment, or carrying on of any criminal activity in violation of Penal Code Section
13 186.10(a)(1), a felony, to wit: \$1,238,561.75 deposited into an account at Bank of America.

14 It is further alleged that Sacramento County has jurisdiction in this count pursuant to
15 Penal Code section 781.

16
17 **COUNT FIFTEEN**

18 **[MONEY LAUNDERING]**

19 On or about May 8, 2018 through May 16, 2018, at and in the county of Riverside, State
20 of California, defendant BANAYOTIS HADDAD willfully and unlawfully conducted a
21 transaction involving a monetary instrument of a total value exceeding \$25,000, with the specific
22 intent to promote, manage, establish, or carry on, or facilitate the promotion, management,
23 establishment, or carrying on of any criminal activity in violation of Penal Code Section
24 186.10(a)(1), a felony, to wit: \$624,149 deposited into an account at Bank of America.

25 It is further alleged that Sacramento County has jurisdiction in this count pursuant to
26 Penal Code section 781.

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1 **COUNT SIXTEEN**

2 **[MONEY LAUNDERING]**

3 On or about June 5, 2018 through June 13, 2018, at and in the county of Riverside, State
4 of California, defendant BANAYOTIS HADDAD willfully and unlawfully conducted a
5 transaction involving a monetary instrument of a total value exceeding \$25,000, with the specific
6 intent to promote, manage, establish, or carry on, or facilitate the promotion, management,
7 establishment, or carrying on of any criminal activity in violation of Penal Code Section
8 186.10(a)(1), a felony, to wit: \$875,527 deposited into an account at Bank of America.

9 It is further alleged that Sacramento County has jurisdiction in this count pursuant to
10 Penal Code section 781.

11
12 **COUNT SEVENTEEN**

13 **[MONEY LAUNDERING]**

14 On or about July 9, 2018 through July 27, 2018, at and in the county of Riverside, State of
15 California, defendant BANAYOTIS HADDAD willfully and unlawfully conducted a transaction
16 involving a monetary instrument of a total value exceeding \$25,000, with the specific intent to
17 promote, manage, establish, or carry on, or facilitate the promotion, management, establishment,
18 or carrying on of any criminal activity in violation of Penal Code Section 186.10(a)(1), a felony,
19 to wit: \$1,072,882.45 deposited into an account at Bank of America.

20 It is further alleged that Sacramento County has jurisdiction in this count pursuant to
21 Penal Code section 781.

22
23 **COUNT EIGHTEEN**

24 **[MONEY LAUNDERING]**

25 On or about August 2, 2018, at and in the county of Riverside, State of California,
26 defendant BANAYOTIS HADDAD willfully and unlawfully conducted a transaction involving a
27 monetary instrument of a total value exceeding \$5,000, with the specific intent to promote,
28 manage, establish, or carry on, or facilitate the promotion, management, establishment, or

1 carrying on of any criminal activity in violation of Penal Code Section 186.10(a)(1), a felony, to
2 wit: \$233,286 deposited into an account at Bank of America.

3 It is further alleged that Sacramento County has jurisdiction in this count pursuant to
4 Penal Code section 781.

5
6 **COUNT NINETEEN**

7 **[MONEY LAUNDERING]**

8 On or about October 1, 2018 through October 4, 2018, at and in the county of Riverside,
9 State of California, defendant BANAYOTIS HADDAD willfully and unlawfully conducted a
10 transaction involving a monetary instrument of a total value exceeding \$25,000, with the specific
11 intent to promote, manage, establish, or carry on, or facilitate the promotion, management,
12 establishment, or carrying on of any criminal activity in violation of Penal Code Section
13 186.10(a)(1), a felony, to wit: \$465,636 deposited into an account at Bank of America.

14 It is further alleged that Sacramento County has jurisdiction in this count pursuant to
15 Penal Code section 781.

16
17 **SAMBA PREMIUM TOBACCO, INC.**

18 **COUNT TWENTY**

19 **[CONSPIRACY]**

20 From on or about January 16, 2018 through December 24, 2019, defendants RAMZI
21 IBRAHIM SABA and JOSEF FRIWAT committed the crime of conspiracy, in violation of Penal
22 Code Section 182(a)(1), in that they did unlawfully conspire together, and with other uncharged
23 person or persons, to commit the crime of filing false tax returns, in violation of Revenue and
24 Taxation Code sections 30472 and 30480, a felony.

25 It is further alleged that Sacramento County has jurisdiction in this count pursuant to
26 Penal Code section 781, and that pursuant to and for the purpose of carrying out the objectives
27 and purposes of the aforesaid conspiracy, the said defendants committed the following overt
28 act(s):

1 **OVERT ACT ONE**

2 On or about January 16, 2018, in the County of San Diego, State of California, defendant
3 JOSEF FRIWAT filed A Statement of Information for Samba Premium Tobacco, Inc. with the
4 California Secretary of State.

5 **OVERT ACT TWO**

6 On or about April 12, 2019, in the County of San Bernardino, State of California,
7 defendant RAMZI IBRAHIM SABA sent a \$400,000 wire payment from Alaska Federal Credit
8 Union account ending 8200 to Samba Premium Tobacco, Inc. Citibank account number ending
9 0632.

10 **OVERT ACT THREE**

11 On or about April 25, 2019, in the County of San Diego, State of California, defendant
12 JOSEF FRIWAT went to Mission Federal Credit Union, where he provided instructions to send a
13 \$471,734.60 wire payment from Samba Premium Tobacco, Inc. bank account ending 7455 to
14 Mecca Enterprises.

15 **OVERT ACT FOUR**

16 On or about May 10, 2019, in the County of San Diego, State of California, defendant
17 JOSEF FRIWAT went to Mission Federal Credit Union, where he provided instructions to send a
18 \$390,164.50 wire payment from Samba Premium Tobacco, Inc. bank account ending 7455 to
19 Mecca Enterprises.

20 **OVERT ACT FIVE**

21 On or about May 23, 2019, in the County of San Diego, State of California, defendant
22 JOSEF FRIWAT sent a text message to Rafael Santiago telling him he likes
23 salesnow12@gmail.com as his email.

24 **OVERT ACT SIX**

25 On or about May 23, 2019, in the County of San Diego, State of California, Rafael
26 Santiago sent defendant JOSEF FRIWAT a text message containing the password for email
27 account salesnow12@gmail.com.

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1 **OVERT ACT SEVEN**

2 On or about May 29, 2019, in the County of San Diego, State of California,
3 defendant JOSEF FRIWAT went to Mission Federal Credit Union, where he provided
4 instructions to send a \$185,299.50 wire payment from Samba Premium Tobacco, Inc. bank
5 account ending 7455 to Mecca Enterprises.

6 **OVERT ACT EIGHT**

7 On or about June 28, 2019, in the County of San Bernardino, State of California,
8 defendant RAMZI IBRAHIM SABA sent a \$393,125 wire payment from Alaska Federal Credit
9 Union account ending 8200 to Samba Premium Tobacco, Inc. Mission Federal Credit Union
10 account number ending 7455

11 **OVERT ACT NINE**

12 On or about June 29, 2019, in the County of San Diego, State of California, defendant
13 JOSEF FRIWAT went to Mission Federal Credit Union, where he provided instructions to send a
14 \$367,345.70 wire payment from Samba Premium Tobacco, Inc. bank account ending 7455 to
15 Mecca Enterprises.

16 **OVERT ACT TEN**

17 On or about August 6, 2019, in the County of San Bernardino, State of California,
18 defendant RAMZI IBRAHIM SABA sent a \$350,000 wire payment from Alaska Federal Credit
19 Union account ending 8200 to Samba Premium Tobacco, Inc. JP Morgan Chase Bank account
20 number ending 8852.

21 **OVERT ACT ELEVEN**

22 On or about August 7, 2019, in the County of San Diego, State of California, defendant
23 JOSEF FRIWAT went to JP Morgan Chase Bank, where he provided instructions to send a
24 \$398,096 wire payment to Mecca Enterprises.

25 **OVERT ACT TWELVE**

26 On or about August 12, 2019, in the County of San Bernardino, State of California,
27 defendant RAMZI IBRAHIM SABA issued a \$52,110 check to Samba Premium Tobacco, Inc.

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1 **OVERT ACT THIRTEEN**

2 On or about August 30, 2019, in the County of San Bernardino, State of California,
3 defendant RAMZI IBRAHIM SABA sent a \$300,000 wire payment from Alaska Federal Credit
4 Union account ending 8200 to Samba Premium Tobacco, Inc. JP Morgan Chase Bank account
5 number ending 8852.

6 **OVERT ACT FOURTEEN**

7 On or about September 3, 2019, in the County of San Diego, State of California,
8 defendant JOSEF FRIWAT went to JP Morgan Chase Bank, where he provided instructions to
9 send a \$264,081.80 wire payment to Mecca Enterprises.

10 **OVERT ACT FIFTEEN**

11 On or about September 9, 2019, in the County of San Bernardino, State of California,
12 defendant RAMZI IBRAHIM SABA sent a \$300,000 wire payment from Alaska Federal Credit
13 Union account ending 8200 to Samba Premium Tobacco, Inc. JP Morgan Chase Bank account
14 number ending 8852.

15 **OVERT ACT SIXTEEN**

16 On or about September 10, 2019, in the County of San Diego, State of California,
17 defendant JOSEF FRIWAT went to JP Morgan Chase Bank, where he provided instructions to
18 send a \$368,753.60 wire payment to Mecca Enterprises.

19 **OVERT ACT SEVENTEEN**

20 On or about October 1, 2019, in the County of San Diego, State of California, defendant
21 JOSEF FRIWAT went to JP Morgan Chase Bank, where he provided instructions to send a
22 \$292,747.50 wire payment to Mecca Enterprises.

23 **OVERT ACT EIGHTEEN**

24 On or about December 24, 2019, in the County of San Diego, State of California,
25 defendant JOSEF FRIWAT withdrew \$222,787.50 from Samba Premium Tobacco, Inc. JP
26 Morgan Chase Bank account ending 8852, and purchased a cashier check payable to Mecca
27 Enterprises.

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1 **COUNT TWENTY-ONE**

2 **[FALSE TAX RETURN]**

3 On or about July 18, 2019, at and in the County of Sacramento, State of California,
4 defendants RAMZI IBRAHIM SABA and JOSEF FRIWAT, being a person required to make,
5 render, sign or verify a tax return for tobacco distributor license number 050-005947, unlawfully
6 filed or caused the filing of a false or fraudulent tax return for the period April 1, 2019 through
7 June 30, 2019, in violation of Revenue and Taxation Code section 30472.

8 It is further alleged that defendants RAMZI IBRAHIM SABA and JOSEF FRIWAT acted
9 with the intent to defeat or evade an unreported tax liability exceeding twenty-five thousand
10 dollars (\$25,000) within any 12-consecutive month period, in violation of Revenue and Taxation
11 Code section 30480, a felony, to wit: Failure to pay \$1,179,676 excise tax to the California
12 Department of Tax and Fee Administration.

13
14 **COUNT TWENTY-TWO**

15 **[UNLICENSED DISTRIBUTOR]**

16 On or about July 25, 2019, at and in the County of San Bernardino, State of California,
17 defendant RAMZI IBRAHIM SABA, being a person required to obtain a license as a distributor,
18 engaged in business as a distributor without a license, in violation of Revenue and Taxation Code
19 section 30149.

20 It is further alleged that defendant RAMZI IBRAHIM SABA acted with the intent to
21 defeat or evade an unreported tax liability exceeding twenty-five thousand dollars (\$25,000)
22 within any 12-consecutive month period, in violation of Revenue and Taxation Code section
23 30480, a felony, to wit: Failure to pay \$1,179,676 excise tax to the California Department of Tax
24 and Fee Administration.

25 It is further alleged that Sacramento County has jurisdiction in this count pursuant to
26 Penal Code section 781.

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1 **COUNT TWENTY-THREE**

2 **[FALSE TAX RETURN]**

3 On or about October 28, 2019, at and in the County of Sacramento, State of California,
4 defendants RAMZI IBRAHIM SABA and JOSEF FRIWAT, being a person required to make,
5 render, sign or verify a tax return for tobacco distributor license number 050-005947, unlawfully
6 filed or caused the filing of a false or fraudulent tax return for the period July 1, 2019 through
7 September 30, 2019, in violation of Revenue and Taxation Code section 30472.

8 It is further alleged that defendants RAMZI IBRAHIM SABA and JOSEF FRIWAT acted
9 with the intent to defeat or evade an unreported tax liability exceeding twenty-five thousand
10 dollars (\$25,000) within any 12-consecutive month period, in violation of Revenue and Taxation
11 Code section 30480, a felony, to wit: Failure to pay \$426,205 excise tax to the California
12 Department of Tax and Fee Administration.

13
14 **COUNT TWENTY-FOUR**

15 **[UNLICENSED DISTRIBUTOR]**

16 On or about October 25, 2019, at and in the County of San Bernardino, State of
17 California, defendant RAMZI IBRAHIM SABA, being a person required to obtain a license as a
18 distributor, engaged in business as a distributor without a license, in violation of Revenue and
19 Taxation Code section 30149.

20 It is further alleged that defendant RAMZI IBRAHIM SABA acted with the intent to
21 defeat or evade an unreported tax liability exceeding twenty-five thousand dollars (\$25,000)
22 within any 12-consecutive month period, in violation of Revenue and Taxation Code section
23 30480, a felony, to wit: Failure to pay \$426,205 excise tax to the California Department of Tax
24 and Fee Administration.

25 It is further alleged that Sacramento County has jurisdiction in this count pursuant to
26 Penal Code section 781.

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1 **COUNT TWENTY-FIVE**

2 **[FALSE TAX RETURN]**

3 On or about January 16, 2020, at and in the County of Sacramento, State of California,
4 defendants RAMZI IBRAHIM SABA and JOSEF FRIWAT, being a person required to make,
5 render, sign or verify a tax return for tobacco distributor license number 050-005947, unlawfully
6 filed or caused the filing of a false or fraudulent tax return for the period October 1, 2019 through
7 December 31, 2019, in violation of Revenue and Taxation Code section 30472.

8 It is further alleged that defendants RAMZI IBRAHIM SABA and JOSEF FRIWAT acted
9 with the intent to defeat or evade an unreported tax liability exceeding twenty-five thousand
10 dollars (\$25,000) within any 12-consecutive month period, in violation of Revenue and Taxation
11 Code section 30480, a felony, to wit: Failure to pay \$300,034 excise tax to the California
12 Department of Tax and Fee Administration.

13
14 **COUNT TWENTY-SIX**

15 **[UNLICENSED DISTRIBUTOR]**

16 On or about January 25, 2020, at and in the County of San Bernardino, State of California,
17 defendant RAMZI IBRAHIM SABA, being a person required to obtain a license as a distributor,
18 engaged in business as a distributor without a license, in violation of Revenue and Taxation Code
19 section 30149.

20 It is further alleged that defendant RAMZI IBRAHIM SABA acted with the intent to
21 defeat or evade an unreported tax liability exceeding twenty-five thousand dollars (\$25,000)
22 within any 12-consecutive month period, in violation of Revenue and Taxation Code section
23 30480, a felony, to wit: Failure to pay \$300,034 excise tax to the California Department of Tax
24 and Fee Administration.

25 It is further alleged that Sacramento County has jurisdiction in this count pursuant to
26 Penal Code section 781.

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1 **COUNT TWENTY-SEVEN**

2 **[MONEY LAUNDERING]**

3 On or about April 12, 2019, at and in the county of San Bernardino, State of California,
4 defendant RAMZI IBRAHIM SABA willfully and unlawfully conducted a transaction involving
5 a monetary instrument of a total value exceeding \$25,000, with the specific intent to promote,
6 manage, establish, or carry on, or facilitate the promotion, management, establishment, or
7 carrying on of any criminal activity in violation of Penal Code Section 186.10(a)(1), a felony, to
8 wit: \$400,000 wire transfer from an account at Alaska Federal Credit Union.

9 It is further alleged that Sacramento County has jurisdiction in this count pursuant to
10 Penal Code section 781.

11
12 **COUNT TWENTY-EIGHT**

13 **[MONEY LAUNDERING]**

14 On or about April 25, 2019, at and in the county of San Diego, State of California,
15 defendant JOSEF FRIWAT willfully and unlawfully conducted a transaction involving a
16 monetary instrument of a total value exceeding \$25,000, with the specific intent to promote,
17 manage, establish, or carry on, or facilitate the promotion, management, establishment, or
18 carrying on of any criminal activity in violation of Penal Code Section 186.10(a)(1), a felony, to
19 wit: \$471,734.60 wire transfer from an account at Mission Federal Credit Union.

20 It is further alleged that Sacramento County has jurisdiction in this count pursuant to
21 Penal Code section 781.

22
23 **COUNT TWENTY-NINE**

24 **[MONEY LAUNDERING]**

25 On or about May 10, 2019, at and in the county of San Diego, State of California,
26 defendant JOSEF FRIWAT willfully and unlawfully conducted a transaction involving a
27 monetary instrument of a total value exceeding \$25,000, with the specific intent to promote,
28 manage, establish, or carry on, or facilitate the promotion, management, establishment, or

1 carrying on of any criminal activity in violation of Penal Code Section 186.10(a)(1), a felony, to
2 wit: \$390,164.50 wire transfer from an account at Mission Federal Credit Union.

3 It is further alleged that Sacramento County has jurisdiction in this count pursuant to
4 Penal Code section 781.

5
6 **COUNT THIRTY**

7 **[MONEY LAUNDERING]**

8 On or about May 29, 2019, at and in the county of San Diego, State of California,
9 defendant JOSEF FRIWAT willfully and unlawfully conducted a transaction involving a
10 monetary instrument of a total value exceeding \$25,000, with the specific intent to promote,
11 manage, establish, or carry on, or facilitate the promotion, management, establishment, or
12 carrying on of any criminal activity in violation of Penal Code Section 186.10(a)(1), a felony, to
13 wit: \$185,299.50 wire transfer from an account at Mission Federal Credit Union.

14 It is further alleged that Sacramento County has jurisdiction in this count pursuant to
15 Penal Code section 781.

16
17 **COUNT THIRTY-ONE**

18 **[MONEY LAUNDERING]**

19 On or about June 28, 2019, at and in the county of San Bernardino, State of California,
20 defendant RAMZI IBRAHIM SABA willfully and unlawfully conducted a transaction involving
21 a monetary instrument of a total value exceeding \$25,000, with the specific intent to promote,
22 manage, establish, or carry on, or facilitate the promotion, management, establishment, or
23 carrying on of any criminal activity in violation of Penal Code Section 186.10(a)(1), a felony, to
24 wit: \$393,125 wire transfer from an account at Alaska Federal Credit Union.

25 It is further alleged that Sacramento County has jurisdiction in this count pursuant to
26 Penal Code section 781.

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1 **COUNT THIRTY-TWO**

2 **[MONEY LAUNDERING]**

3 On or about June 29, 2019, at and in the county of San Diego, State of California,
4 defendant JOSEF FRIWAT willfully and unlawfully conducted a transaction involving a
5 monetary instrument of a total value exceeding \$25,000, with the specific intent to promote,
6 manage, establish, or carry on, or facilitate the promotion, management, establishment, or
7 carrying on of any criminal activity in violation of Penal Code Section 186.10(a)(1), a felony, to
8 wit: \$367,345.70 wire transfer from an account at Mission Federal Credit Union.

9 It is further alleged that Sacramento County has jurisdiction in this count pursuant to
10 Penal Code section 781.

11
12 **COUNT THIRTY-THREE**

13 **[MONEY LAUNDERING]**

14 On or about August 6, 2019, at and in the county of San Bernardino, State of California,
15 defendant RAMZI IBRAHIM SABA willfully and unlawfully conducted a transaction involving
16 a monetary instrument of a total value exceeding \$25,000, with the specific intent to promote,
17 manage, establish, or carry on, or facilitate the promotion, management, establishment, or
18 carrying on of any criminal activity in violation of Penal Code Section 186.10(a)(1), a felony, to
19 wit: \$350,000 wire transfer from an account at Alaska Federal Credit Union.

20 It is further alleged that Sacramento County has jurisdiction in this count pursuant to
21 Penal Code section 781.

22
23 **COUNT THIRTY-FOUR**

24 **[MONEY LAUNDERING]**

25 On or about August 7, 2019, at and in the county of San Diego, State of California,
26 defendant JOSEF FRIWAT willfully and unlawfully conducted a transaction involving a
27 monetary instrument of a total value exceeding \$25,000, with the specific intent to promote,
28 manage, establish, or carry on, or facilitate the promotion, management, establishment, or

1 carrying on of any criminal activity in violation of Penal Code Section 186.10(a)(1), a felony, to
2 wit: \$398,096 wire transfer from an account at JP Morgan Chase Bank.

3 It is further alleged that Sacramento County has jurisdiction in this count pursuant to
4 Penal Code section 781.

5
6 **COUNT THIRTY-FIVE**

7 **[MONEY LAUNDERING]**

8 On or about August 12, 2019, at and in the county of San Bernardino, State of California,
9 defendant RAMZI IBRAHIM SABA willfully and unlawfully conducted a transaction involving
10 a monetary instrument of a total value exceeding \$25,000, with the specific intent to promote,
11 manage, establish, or carry on, or facilitate the promotion, management, establishment, or
12 carrying on of any criminal activity in violation of Penal Code Section 186.10(a)(1), a felony, to
13 wit: \$52,110 check issued from an account at Alaska Federal Credit Union.

14 It Is further alleged that Sacramento County has jurisdiction in this count pursuant to
15 Penal Code section 781.

16
17 **COUNT THIRTY-SIX**

18 **[MONEY LAUNDERING]**

19 On or about August 30, 2019, at and in the county of San Bernardino, State of California,
20 defendant RAMZI IBRAHIM SABA willfully and unlawfully conducted a transaction involving
21 a monetary instrument of a total value exceeding \$25,000, with the specific intent to promote,
22 manage, establish, or carry on, or facilitate the promotion, management, establishment, or
23 carrying on of any criminal activity in violation of Penal Code Section 186.10(a)(1), a felony, to
24 wit: \$300,000 wire transfer from an account at Alaska Federal Credit Union.

25 It is further alleged that Sacramento County has jurisdiction in this count pursuant to
26 Penal Code section 781.

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1 **COUNT THIRTY-SEVEN**

2 **[MONEY LAUNDERING]**

3 On or about September 3, 2019, at and in the county of San Diego, State of California,
4 defendant JOSEF FRIWAT willfully and unlawfully conducted a transaction involving a
5 monetary instrument of a total value exceeding \$25,000, with the specific intent to promote,
6 manage, establish, or carry on, or facilitate the promotion, management, establishment, or
7 carrying on of any criminal activity in violation of Penal Code Section 186.10(a)(1), a felony, to
8 wit: \$264,081.80 wire transfer from an account at JP Morgan Chase Bank.

9 It is further alleged that Sacramento County has jurisdiction in this count pursuant to
10 Penal Code section 781.

11
12 **COUNT THIRTY-EIGHT**

13 **[MONEY LAUNDERING]**

14 On or about September 9, 2019, at and in the county of San Bernardino, State of
15 California, defendant RAMZI IBRAHIM SABA willfully and unlawfully conducted a transaction
16 involving a monetary instrument of a total value exceeding \$25,000, with the specific intent to
17 promote, manage, establish, or carry on, or facilitate the promotion, management, establishment,
18 or carrying on of any criminal activity in violation of Penal Code Section 186.10(a)(1), a felony,
19 to wit: \$300,000 wire transfer from an account at Alaska Federal Credit Union.

20 It is further alleged that Sacramento County has jurisdiction in this count pursuant to
21 Penal Code section 781.

22
23 **COUNT THIRTY-NINE**

24 **[MONEY LAUNDERING]**

25 On or about September 10, 2019, at and in the county of San Diego, State of California,
26 defendant JOSEF FRIWAT willfully and unlawfully conducted a transaction involving a
27 monetary instrument of a total value exceeding \$25,000, with the specific intent to promote,
28 manage, establish, or carry on, or facilitate the promotion, management, establishment, or

1 carrying on of any criminal activity in violation of Penal Code Section 186.10(a)(1), a felony, to
2 wit: \$368,753.60 wire transfer from an account at JP Morgan Chase Bank.

3 It is further alleged that Sacramento County has jurisdiction in this count pursuant to
4 Penal Code section 781.

5
6 **COUNT FORTY**

7 **[MONEY LAUNDERING]**

8 On or about October 1, 2019, at and in the county of San Diego, State of California,
9 defendant JOSEF FRIWAT willfully and unlawfully conducted a transaction involving a
10 monetary instrument of a total value exceeding \$25,000, with the specific intent to promote,
11 manage, establish, or carry on, or facilitate the promotion, management, establishment, or
12 carrying on of any criminal activity in violation of Penal Code Section 186.10(a)(1), a felony, to
13 wit: \$292,747.50 wire transfer from an account at JP Morgan Chase Bank.

14 It is further alleged that Sacramento County has jurisdiction in this count pursuant to
15 Penal Code section 781.

16
17 **COUNT FORTY-ONE**

18 **[MONEY LAUNDERING]**

19 On or about December 24, 2019, at and in the county of San Diego, State of California,
20 defendant JOSEF FRIWAT willfully and unlawfully conducted a transaction involving a
21 monetary instrument of a total value exceeding \$25,000, with the specific intent to promote,
22 manage, establish, or carry on, or facilitate the promotion, management, establishment, or
23 carrying on of any criminal activity in violation of Penal Code Section 186.10(a)(1), a felony, to
24 wit: \$52,110 check issued from an account at JP Morgan Chase Bank.

25 It is further alleged that Sacramento County has jurisdiction in this count pursuant to
26 Penal Code section 781.

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1 **SOUTHWEST DISTRIBUTOR**

2 **COUNT FORTY-TWO**

3 **[FALSE TAX RETURN]**

4 On or about November 24, 2019, at and in the County of Sacramento, State of California,
5 defendant RAMZI IBRAHIM SABA, being a person required to make, render, sign or verify a
6 tax return for tobacco distributor license number 243-618944, unlawfully filed or caused the
7 filing of a false or fraudulent tax return for the period October 1, 2019 through October 31, 2019,
8 in violation of Revenue and Taxation Code section 30472.

9 It is further alleged that defendant RAMZI IBRAHIM SABA acted with the intent to
10 defeat or evade an unreported tax liability exceeding twenty-five thousand dollars (\$25,000)
11 within any 12-consecutive month period, in violation of Revenue and Taxation Code section
12 30480, a felony, to wit: Failure to pay \$383,658 excise tax to the California Department of Tax
13 and Fee Administration.

14
15 **COUNT FORTY-THREE**

16 **[FALSE TAX RETURN]**

17 On or about December 4, 2019, at and in the County of Sacramento, State of California,
18 defendant RAMZI IBRAHIM SABA, being a person required to make, render, sign or verify a
19 tax return for tobacco distributor license number 243-618944, unlawfully filed or caused the
20 filing of a false or fraudulent tax return for the period November 1, 2019 through November 30,
21 2019, in violation of Revenue and Taxation Code section 30472.

22 It is further alleged that defendant RAMZI IBRAHIM SABA acted with the intent to
23 defeat or evade an unreported tax liability exceeding twenty-five thousand dollars (\$25,000)
24 within any 12-consecutive month period, in violation of Revenue and Taxation Code section
25 30480, a felony, to wit: Failure to pay \$223,042 excise tax to the California Department of Tax
26 and Fee Administration.

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1 **COUNT FORTY-FOUR**

2 **[FALSE TAX RETURN]**

3 On or about February 17, 2020, at and in the County of Sacramento, State of California,
4 defendant RAMZI IBRAHIM SABA, being a person required to make, render, sign or verify a
5 tax return for tobacco distributor license number 243-618944, unlawfully filed or caused the
6 filing of a false or fraudulent tax return for the period December 1, 2019 through December 31,
7 2019, in violation of Revenue and Taxation Code section 30472.

8 It is further alleged that defendant RAMZI IBRAHIM SABA acted with the intent to
9 defeat or evade an unreported tax liability exceeding twenty-five thousand dollars (\$25,000)
10 within any 12-consecutive month period, in violation of Revenue and Taxation Code section
11 30480, a felony, to wit: Failure to pay \$379,951 excise tax to the California Department of Tax
12 and Fee Administration.

13
14 **COUNT FORTY-FIVE**

15 **[FALSE TAX RETURN]**

16 On or about May 27, 2020, at and in the County of Sacramento, State of California,
17 defendant RAMZI IBRAHIM SABA, being a person required to make, render, sign or verify a
18 tax return for tobacco distributor license number 243-618944, unlawfully filed or caused the
19 filing of a false or fraudulent tax return for the period April 1, 2020 through April 30, 2020, in
20 violation of Revenue and Taxation Code section 30472.

21 It is further alleged that defendant RAMZI IBRAHIM SABA acted with the intent to
22 defeat or evade an unreported tax liability exceeding twenty-five thousand dollars (\$25,000)
23 within any 12-consecutive month period, in violation of Revenue and Taxation Code section
24 30480, a felony, to wit: Failure to pay \$199,972 excise tax to the California Department of Tax
25 and Fee Administration.

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1 **COUNT FORTY-SIX**

2 **[UNLICENSED DISTRIBUTOR]**

3 On or about July 25, 2020, at and in the County of San Bernardino, State of California,
4 defendant RAMZI IBRAHIM SABA, being a person required to obtain a license as a distributor,
5 engaged in business as a distributor without a license, in violation of Revenue and Taxation Code
6 section 30149.

7 It is further alleged that defendant RAMZI IBRAHIM SABA acted with the intent to
8 defeat or evade an unreported tax liability exceeding twenty-five thousand dollars (\$25,000)
9 within any 12-consecutive month period, in violation of Revenue and Taxation Code section
10 30480, a felony, to wit: Failure to pay \$276,487 excise tax to the California Department of Tax
11 and Fee Administration.

12 It is further alleged that Sacramento County has jurisdiction in this count pursuant to
13 Penal Code section 781.

14
15 **COUNT FORTY-SEVEN**

16 **[UNLICENSED DISTRIBUTOR]**

17 On or about January 25, 2020, at and in the County of San Bernardino, State of California,
18 defendant RAMZI IBRAHIM SABA, being a person required to obtain a license as a distributor,
19 engaged in business as a distributor without a license, in violation of Revenue and Taxation Code
20 section 30149.

21 It is further alleged that defendant RAMZI IBRAHIM SABA acted with the intent to
22 defeat or evade an unreported tax liability exceeding twenty-five thousand dollars (\$25,000)
23 within any 12-consecutive month period, in violation of Revenue and Taxation Code section
24 30480, a felony, to wit: Failure to pay \$441,272 excise tax to the California Department of Tax
25 and Fee Administration.

26 It is further alleged that Sacramento County has jurisdiction in this count pursuant to
27 Penal Code section 781.

28 ///

1 **COUNT FORTY-EIGHT**

2 **[UNLICENSED DISTRIBUTOR]**

3 On or about February 25, 2020, at and in the County of San Bernardino, State of
4 California, defendant RAMZI IBRAHIM SABA, being a person required to obtain a license as a
5 distributor, engaged in business as a distributor without a license, in violation of Revenue and
6 Taxation Code section 30149.

7 It is further alleged that defendant RAMZI IBRAHIM SABA acted with the intent to
8 defeat or evade an unreported tax liability exceeding twenty-five thousand dollars (\$25,000)
9 within any 12-consecutive month period, in violation of Revenue and Taxation Code section
10 30480, a felony, to wit: Failure to pay \$690,058 excise tax to the California Department of Tax
11 and Fee Administration.

12 It is further alleged that Sacramento County has jurisdiction in this count pursuant to
13 Penal Code section 781.

14
15 **COUNT FORTY-NINE**

16 **[UNLICENSED DISTRIBUTOR]**

17 On or about April 25, 2020, at and in the County of San Bernardino, State of California,
18 defendant RAMZI IBRAHIM SABA, being a person required to obtain a license as a distributor,
19 engaged in business as a distributor without a license, in violation of Revenue and Taxation Code
20 section 30149.

21 It is further alleged that defendant RAMZI IBRAHIM SABA acted with the intent to
22 defeat or evade an unreported tax liability exceeding twenty-five thousand dollars (\$25,000)
23 within any 12-consecutive month period, in violation of Revenue and Taxation Code section
24 30480, a felony, to wit: Failure to pay \$353,530 excise tax to the California Department of Tax
25 and Fee Administration.

26 It is further alleged that Sacramento County has jurisdiction in this count pursuant to
27 Penal Code section 781.

28 ///

1 **COUNT FIFTY**

2 **[UNLICENSED DISTRIBUTOR]**

3 On or about May 25, 2020, at and in the County of San Bernardino, State of California,
4 defendant RAMZI IBRAHIM SABA, being a person required to obtain a license as a distributor,
5 engaged in business as a distributor without a license, in violation of Revenue and Taxation Code
6 section 30149.

7 It is further alleged that defendant RAMZI IBRAHIM SABA acted with the intent to
8 defeat or evade an unreported tax liability exceeding twenty-five thousand dollars (\$25,000)
9 within any 12-consecutive month period, in violation of Revenue and Taxation Code section
10 30480, a felony, to wit: Failure to pay \$707,066 excise tax to the California Department of Tax
11 and Fee Administration.

12 It is further alleged that Sacramento County has jurisdiction in this count pursuant to
13 Penal Code section 781.

14
15 **COUNT FIFTY-ONE**

16 **[UNLICENSED DISTRIBUTOR]**

17 On or about June 25, 2020, at and in the County of San Bernardino, State of California,
18 defendant RAMZI IBRAHIM SABA, being a person required to obtain a license as a distributor,
19 engaged in business as a distributor without a license, in violation of Revenue and Taxation Code
20 section 30149.

21 It is further alleged that defendant RAMZI IBRAHIM SABA acted with the intent to
22 defeat or evade an unreported tax liability exceeding twenty-five thousand dollars (\$25,000)
23 within any 12-consecutive month period, in violation of Revenue and Taxation Code section
24 30480, a felony, to wit: Failure to pay \$496,888 excise tax to the California Department of Tax
25 and Fee Administration.

26 It is further alleged that Sacramento County has jurisdiction in this count pursuant to
27 Penal Code section 781.

28 ///

1 **COUNT FIFTY-TWO**

2 **[UNLICENSED DISTRIBUTOR]**

3 On or about July 25, 2020, at and in the County of San Bernardino, State of California,
4 defendant RAMZI IBRAHIM SABA, being a person required to obtain a license as a distributor,
5 engaged in business as a distributor without a license, in violation of Revenue and Taxation Code
6 section 30149.

7 It is further alleged that defendant RAMZI IBRAHIM SABA acted with the intent to
8 defeat or evade an unreported tax liability exceeding twenty-five thousand dollars (\$25,000)
9 within any 12-consecutive month period, in violation of Revenue and Taxation Code section
10 30480, a felony, to wit: Failure to pay \$113,184 excise tax to the California Department of Tax
11 and Fee Administration.

12 It is further alleged that Sacramento County has jurisdiction in this count pursuant to
13 Penal Code section 781.

14
15 **COUNT FIFTY-THREE**

16 **[UNLICENSED DISTRIBUTOR]**

17 On or about November 25, 2020, at and in the County of San Bernardino, State of
18 California, defendant RAMZI IBRAHIM SABA, being a person required to obtain a license as a
19 distributor, engaged in business as a distributor without a license, in violation of Revenue and
20 Taxation Code section 30149.

21 It is further alleged that defendant RAMZI IBRAHIM SABA acted with the intent to
22 defeat or evade an unreported tax liability exceeding twenty-five thousand dollars (\$25,000)
23 within any 12-consecutive month period, in violation of Revenue and Taxation Code section
24 30480, a felony, to wit: Failure to pay \$342,588 excise tax to the California Department of Tax
25 and Fee Administration.

26 It is further alleged that Sacramento County has jurisdiction in this count pursuant to
27 Penal Code section 781.

28 ///

1 **COUNT FIFTY-FOUR**

2 **[UNLICENSED DISTRIBUTOR]**

3 On or about December 25, 2020, at and in the County of San Bernardino, State of
4 California, defendant RAMZI IBRAHIM SABA, being a person required to obtain a license as a
5 distributor, engaged in business as a distributor without a license, in violation of Revenue and
6 Taxation Code section 30149.

7 It is further alleged that defendant RAMZI IBRAHIM SABA acted with the intent to
8 defeat or evade an unreported tax liability exceeding twenty-five thousand dollars (\$25,000)
9 within any 12-consecutive month period, in violation of Revenue and Taxation Code section
10 30480, a felony, to wit: Failure to pay \$213,165 excise tax to the California Department of Tax
11 and Fee Administration.

12 It is further alleged that Sacramento County has jurisdiction in this count pursuant to
13 Penal Code section 781.

14
15 **COUNT FIFTY-FIVE**

16 **[UNLICENSED DISTRIBUTOR]**

17 On or about January 25, 2021, at and in the County of San Bernardino, State of California,
18 defendant RAMZI IBRAHIM SABA, being a person required to obtain a license as a distributor,
19 engaged in business as a distributor without a license, in violation of Revenue and Taxation Code
20 section 30149.

21 It is further alleged that defendant RAMZI IBRAHIM SABA acted with the intent to
22 defeat or evade an unreported tax liability exceeding twenty-five thousand dollars (\$25,000)
23 within any 12-consecutive month period, in violation of Revenue and Taxation Code section
24 30480, a felony, to wit: Failure to pay \$108,312 excise tax to the California Department of Tax
25 and Fee Administration.

26 It is further alleged that Sacramento County has jurisdiction in this count pursuant to
27 Penal Code section 781.

28 ///

1 **COUNT FIFTY-SIX**

2 **[UNLICENSED DISTRIBUTOR]**

3 On or about May 25, 2021, at and in the County of San Bernardino, State of California,
4 defendant RAMZI IBRAHIM SABA, being a person required to obtain a license as a distributor,
5 engaged in business as a distributor without a license, in violation of Revenue and Taxation Code
6 section 30149.

7 It is further alleged that defendant RAMZI IBRAHIM SABA acted with the intent to
8 defeat or evade an unreported tax liability exceeding twenty-five thousand dollars (\$25,000)
9 within any 12-consecutive month period, in violation of Revenue and Taxation Code section
10 30480, a felony, to wit: Failure to pay \$456,291 excise tax to the California Department of Tax
11 and Fee Administration.

12 It is further alleged that Sacramento County has jurisdiction in this count pursuant to
13 Penal Code section 781.

14
15 **COUNT FIFTY-SEVEN**

16 **[UNLICENSED DISTRIBUTOR]**

17 On or about September 25, 2021, at and in the County of San Bernardino, State of
18 California, defendant RAMZI IBRAHIM SABA, being a person required to obtain a license as a
19 distributor, engaged in business as a distributor without a license, in violation of Revenue and
20 Taxation Code section 30149.

21 It is further alleged that defendant RAMZI IBRAHIM SABA acted with the intent to
22 defeat or evade an unreported tax liability exceeding twenty-five thousand dollars (\$25,000)
23 within any 12-consecutive month period, in violation of Revenue and Taxation Code section
24 30480, a felony, to wit: Failure to pay \$549,980 excise tax to the California Department of Tax
25 and Fee Administration.

26 It is further alleged that Sacramento County has jurisdiction in this count pursuant to
27 Penal Code section 781.

28 ///

1 **COUNT FIFTY-EIGHT**

2 **[MONEY LAUNDERING]**

3 On or about October 15, 2019, at and in the county of San Bernardino, State of California,
4 defendant RAMZI IBRAHIM SABA willfully and unlawfully conducted a transaction involving
5 a monetary instrument of a total value exceeding \$5,000, with the specific intent to promote,
6 manage, establish, or carry on, or facilitate the promotion, management, establishment, or
7 carrying on of any criminal activity in violation of Penal Code Section 186.10(a)(1), a felony, to
8 wit: \$334,723 withdrawn from an account at Alaska USA Federal Credit Union.

9 It is further alleged that Sacramento County has jurisdiction in this count pursuant to
10 Penal Code section 781.

11
12 **COUNT FIFTY-NINE**

13 **[MONEY LAUNDERING]**

14 On or about October 23, 2019, at and in the county of San Bernardino, State of California,
15 defendant RAMZI IBRAHIM SABA willfully and unlawfully conducted a transaction involving
16 a monetary instrument of a total value exceeding \$5,000, with the specific intent to promote,
17 manage, establish, or carry on, or facilitate the promotion, management, establishment, or
18 carrying on of any criminal activity in violation of Penal Code Section 186.10(a)(1), a felony, to
19 wit: \$312,582 withdrawn from an account at Alaska USA Federal Credit Union.

20 It is further alleged that Sacramento County has jurisdiction in this count pursuant to
21 Penal Code section 781.

22
23 **COUNT SIXTY**

24 **[MONEY LAUNDERING]**

25 On or about November 9, 2019, at and in the county of San Bernardino, State of
26 California, defendant RAMZI IBRAHIM SABA willfully and unlawfully conducted a transaction
27 involving a monetary instrument of a total value exceeding \$5,000, with the specific intent to
28 promote, manage, establish, or carry on, or facilitate the promotion, management, establishment,

1 or carrying on of any criminal activity in violation of Penal Code Section 186.10(a)(1), a felony,
2 to wit: \$376,314 withdrawn from an account at Alaska USA Federal Credit Union.

3 It is further alleged that Sacramento County has jurisdiction in this count pursuant to
4 Penal Code section 781.

5
6 **COUNT SIXTY-ONE**

7 **[MONEY LAUNDERING]**

8 On or about November 26, 2019, at and in the county of San Bernardino, State of
9 California, defendant RAMZI IBRAHIM SABA willfully and unlawfully conducted a transaction
10 involving a monetary instrument of a total value exceeding \$5,000, with the specific intent to
11 promote, manage, establish, or carry on, or facilitate the promotion, management, establishment,
12 or carrying on of any criminal activity in violation of Penal Code Section 186.10(a)(1), a felony,
13 to wit: \$326,315 withdrawn from an account at Alaska USA Federal Credit Union.

14 It is further alleged that Sacramento County has jurisdiction in this count pursuant to
15 Penal Code section 781.

16
17 **COUNT SIXTY-TWO**

18 **[MONEY LAUNDERING]**

19 On or about December 11, 2019, at and in the county of San Bernardino, State of
20 California, defendant RAMZI IBRAHIM SABA willfully and unlawfully conducted a transaction
21 involving a monetary instrument of a total value exceeding \$5,000, with the specific intent to
22 promote, manage, establish, or carry on, or facilitate the promotion, management, establishment,
23 or carrying on of any criminal activity in violation of Penal Code Section 186.10(a)(1), a felony,
24 to wit: \$314,735 withdrawn from an account at Alaska USA Federal Credit Union.

25 It is further alleged that Sacramento County has jurisdiction in this count pursuant to
26 Penal Code section 781.

27 ///

28 ///

1 **COUNT SIXTY-THREE**

2 **[MONEY LAUNDERING]**

3 On or about April 24, 2020, at and in the county of San Bernardino, State of California,
4 defendant RAMZI IBRAHIM SABA willfully and unlawfully conducted a transaction involving
5 a monetary instrument of a total value exceeding \$5,000, with the specific intent to promote,
6 manage, establish, or carry on, or facilitate the promotion, management, establishment, or
7 carrying on of any criminal activity in violation of Penal Code Section 186.10(a)(1), a felony, to
8 wit: \$290,000 withdrawn from an account at Alaska USA Federal Credit Union.

9 It is further alleged that Sacramento County has jurisdiction in this count pursuant to
10 Penal Code section 781.

11
12 **COUNT SIXTY-FOUR**

13 **[MONEY LAUNDERING]**

14 On or about April 27, 2020, at and in the county of San Bernardino, State of California,
15 defendant RAMZI IBRAHIM SABA willfully and unlawfully conducted a transaction involving
16 a monetary instrument of a total value exceeding \$5,000, with the specific intent to promote,
17 manage, establish, or carry on, or facilitate the promotion, management, establishment, or
18 carrying on of any criminal activity in violation of Penal Code Section 186.10(a)(1), a felony, to
19 wit: \$47,300 withdrawn from an account at Alaska USA Federal Credit Union.

20 It is further alleged that Sacramento County has jurisdiction in this count pursuant to
21 Penal Code section 781.

22
23 **COUNT SIXTY-FIVE**

24 **[MONEY LAUNDERING]**

25 On or about June 4, 2020, at and in the county of San Bernardino, State of California,
26 defendant RAMZI IBRAHIM SABA willfully and unlawfully conducted a transaction involving
27 a monetary instrument of a total value exceeding \$5,000, with the specific intent to promote,
28 manage, establish, or carry on, or facilitate the promotion, management, establishment, or

1 carrying on of any criminal activity in violation of Penal Code Section 186.10(a)(1), a felony, to
2 wit: \$197,163 withdrawn from an account at Alaska USA Federal Credit Union.

3 It is further alleged that Sacramento County has jurisdiction in this count pursuant to
4 Penal Code section 781.

5
6 **COUNT SIXTY-SIX**
7 **[MONEY LAUNDERING]**

8 On or about June 17, 2020, at and in the county of San Bernardino, State of California,
9 defendant RAMZI IBRAHIM SABA willfully and unlawfully conducted a transaction involving
10 a monetary instrument of a total value exceeding \$5,000, with the specific intent to promote,
11 manage, establish, or carry on, or facilitate the promotion, management, establishment, or
12 carrying on of any criminal activity in violation of Penal Code Section 186.10(a)(1), a felony, to
13 wit: \$269,323 withdrawn from an account at Alaska USA Federal Credit Union.

14 It is further alleged that Sacramento County has jurisdiction in this count pursuant to
15 Penal Code section 781.

16
17 **DESERT WHOLESALE**

18 **COUNT SIXTY-SEVEN**
19 **[CONSPIRACY]**

20 From on or about February 10, 2022 through May 20, 2022, defendants RAMZI
21 IBRAHIM SABA, BANAYOTIS HADDAD and OSAMA ZAKOUR committed the crime of
22 conspiracy, in violation of Penal Code Section 182(a)(1), in that they did unlawfully conspire
23 together, and with other uncharged person or persons, to commit the crime of filing false tax
24 return, in violation of Revenue and Taxation Code sections 30472 and 30480, a felony.

25 It is further alleged that Sacramento County has jurisdiction in this count pursuant to
26 Penal Code section 781, and that pursuant to and for the purpose of carrying out the objectives
27 and purposes of the aforesaid conspiracy, the said defendants committed the following overt
28 act(s):

1 **OVERT ACT ONE**

2 On or about February 10, 2022, in the County of San Bernardino, State of California,
3 defendant RAMZI IBRAHIM SABA purchased a \$290,827.20 cashier check from Alaska USA
4 Federal Credit Union.

5 **OVERT ACT TWO**

6 On or about March 14, 2022, in the County of San Bernardino, State of California,
7 defendant RAMZI IBRAHIM SABA purchased a \$67,830.40 cashier check from Alaska USA
8 Federal Credit Union.

9 **OVERT ACT THREE**

10 On or about March 21, 2022, in the County of San Bernardino, State of California,
11 defendant RAMZI IBRAHIM SABA wire transferred \$20,000 to Ravi's Import Warehouse.

12 **OVERT ACT FOUR**

13 On or about March 31, 2022, in the County of San Bernardino, State of California,
14 defendant RAMZI IBRAHIM SABA wire transferred \$48,642.60 Ravi's Import Warehouse.

15 **OVERT ACT FIVE**

16 On or about April 11, 2022, in the County of San Bernardino, State of California,
17 defendant RAMZI IBRAHIM SABA purchased a \$101,553 cashier check from Chino
18 Commercial Bank.

19 **OVERT ACT SIX**

20 On or about April 11, 2022, in the County of San Bernardino, State of California,
21 defendant BANAYOTIS HADDAD purchased a \$98,005 cashier's check from Chase bank.

22 **OVERT ACT SEVEN**

23 On or about April 11, 2022, in the County of San Bernardino, State of California,
24 defendant RAMZI IBRAHIM SABA purchased a \$154,817 cashier check from Alaska USA
25 Federal Credit Union.

26 **OVERT ACT EIGHT**

27 On or about April 25, 2022, defendant OSAMA ZAKOUR texted Mousa Samir Michael
28 Rahib.

1 **OVERT ACT NINE**

2 On or about April 26, 2022, in the County of San Bernardino, State of California,
3 defendant RAMZI IBRAHIM SABA purchased a \$369,059.30 cashier check from Chino
4 Commercial Bank.

5 **OVERT ACT TEN**

6 On or about May 16, 2022, in the County of San Bernardino, State of California,
7 defendant BANAYOTIS HADDAD purchased a \$245,500.00 cashier's check from Chase bank.

8 **OVERT ACT ELEVEN**

9 On or about May 20, 2022, in the County of San Bernardino, State of California,
10 defendant RAMZI IBRAHIM SABA withdrew \$66.662 from Chino Commercial Bank account
11 ending in 4643.

12 **COUNT SIXTY-EIGHT**

13 **[FALSE TAX RETURN]**

14
15 On or about April 4, 2022, at and in the County of Sacramento, State of California,
16 defendants RAMZI IBRAHIM SABA and OSAMA ZAKOUR, being a person required to make,
17 render, sign or verify a tax return for tobacco distributor license number 256-336576, unlawfully
18 filed or caused the filing of a false or fraudulent tax return for the period February 1, 2022
19 through February 28, 2022, in violation of Revenue and Taxation Code section 30472.

20 It is further alleged that defendants RAMZI IBRAHIM SABA and OSAMA ZAKOUR
21 acted with the intent to defeat or evade an unreported tax liability exceeding twenty-five thousand
22 dollars (\$25,000) within any 12-consecutive month period, in violation of Revenue and Taxation
23 Code section 30480, a felony, to wit: Failure to pay \$376,098.95 excise tax to the California
24 Department of Tax and Fee Administration.

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1 **COUNT SIXTY-NINE**

2 **[UNLICENSED DISTRIBUTOR]**

3 On or about March 25, 2022, at and in the County of San Bernardino, State of California,
4 defendant RAMZI IBRAHIM SABA and OSAMA ZAKOUR, being persons required to obtain a
5 license as a distributor, engaged in business as a distributor without a license, in violation of
6 Revenue and Taxation Code section 30149.

7 It is further alleged that defendant RAMZI IBRAHIM SABA and OSAMA ZAKOUR
8 acted with the intent to defeat or evade an unreported tax liability exceeding twenty-five thousand
9 dollars (\$25,000) within any 12-consecutive month period, in violation of Revenue and Taxation
10 Code section 30480, a felony, to wit: Failure to pay \$376,098.95 excise tax to the California
11 Department of Tax and Fee Administration.

12 It is further alleged that Sacramento County has jurisdiction in this count pursuant to
13 Penal Code section 781.

14
15 **COUNT SEVENTY**

16 **[FALSE TAX RETURN]**

17 On or about April 4, 2022, at and in the County of Sacramento, State of California,
18 defendants RAMZI IBRAHIM SABA and OSAMA ZAKOUR, being a person required to make,
19 render, sign or verify a tax return for tobacco distributor license number 256-336576, unlawfully
20 filed or caused the filing of a false or fraudulent tax return for the period March 1, 2022 through
21 March 31, 2022, in violation of Revenue and Taxation Code section 30472.

22 It is further alleged that defendants RAMZI IBRAHIM SABA and OSAMA ZAKOUR
23 acted with the intent to defeat or evade an unreported tax liability exceeding twenty-five thousand
24 dollars (\$25,000) within any 12-consecutive month period, in violation of Revenue and Taxation
25 Code section 30480, a felony, to wit: Failure to pay \$259,891.43 excise tax to the California
26 Department of Tax and Fee Administration.

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1 **COUNT SEVENTY-ONE**

2 **[UNLICENSED DISTRIBUTOR]**

3 On or about April 25, 2022, at and in the County of San Bernardino, State of California,
4 defendant RAMZI IBRAHIM SABA, BANAYOTIS HADDAD, and OSAMA ZAKOUR, being
5 persons required to obtain a license as a distributor, engaged in business as a distributor without a
6 license, in violation of Revenue and Taxation Code section 30149.

7 It is further alleged that defendant RAMZI IBRAHIM SABA and OSAMA ZAKOUR
8 acted with the intent to defeat or evade an unreported tax liability exceeding twenty-five thousand
9 dollars (\$25,000) within any 12-consecutive month period, in violation of Revenue and Taxation
10 Code section 30480, a felony, to wit: Failure to pay \$259,891.43 excise tax to the California
11 Department of Tax and Fee Administration.

12 It is further alleged that Sacramento County has jurisdiction in this count pursuant to
13 Penal Code section 781.

14
15 **COUNT SEVENTY-TWO**

16 **[FALSE TAX RETURN]**

17 On or about May 17, 2022, at and in the County of Sacramento, State of California,
18 defendants RAMZI IBRAHIM SABA and OSAMA ZAKOUR, being a person required to make,
19 render, sign or verify a tax return for tobacco distributor license number 256-336576, unlawfully
20 filed or caused the filing of a false or fraudulent tax return for the period April 1, 2022 through
21 April 30, 2022, in violation of Revenue and Taxation Code section 30472.

22 It is further alleged that defendants RAMZI IBRAHIM SABA and OSAMA ZAKOUR
23 acted with the intent to defeat or evade an unreported tax liability exceeding twenty-five thousand
24 dollars (\$25,000) within any 12-consecutive month period, in violation of Revenue and Taxation
25 Code section 30480, a felony, to wit: Failure to pay \$575,293.62 excise tax to the California
26 Department of Tax and Fee Administration.

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1 **COUNT SEVENTY-THREE**

2 **[UNLICENSED DISTRIBUTOR]**

3 On or about May 25, 2022, at and in the County of San Bernardino, State of California,
4 defendant RAMZI IBRAHIM SABA, BANAYOTIS HADDAD, and OSAMA ZAKOUR, being
5 persons required to obtain a license as a distributor, engaged in business as a distributor without a
6 license, in violation of Revenue and Taxation Code section 30149.

7 It is further alleged that defendant RAMZI IBRAHIM SABA and OSAMA ZAKOUR
8 acted with the intent to defeat or evade an unreported tax liability exceeding twenty-five thousand
9 dollars (\$25,000) within any 12-consecutive month period, in violation of Revenue and Taxation
10 Code section 30480, a felony, to wit: Failure to pay \$575,293.62 excise tax to the California
11 Department of Tax and Fee Administration.

12 It is further alleged that Sacramento County has jurisdiction in this count pursuant to
13 Penal Code section 781.

14
15 **COUNT SEVENTY-FOUR**

16 **[FALSE TAX RETURN]**

17 On or about August 17, 2022, at and in the County of Sacramento, State of California,
18 defendants RAMZI IBRAHIM SABA and OSAMA ZAKOUR, being a person required to make,
19 render, sign or verify a tax return for tobacco distributor license number 256-336576, unlawfully
20 filed or caused the filing of a false or fraudulent tax return for the period May 1, 2022 through
21 May 31, 2022, in violation of Revenue and Taxation Code section 30472.

22 It is further alleged that defendants RAMZI IBRAHIM SABA and OSAMA ZAKOUR
23 acted with the intent to defeat or evade an unreported tax liability exceeding twenty-five thousand
24 dollars (\$25,000) within any 12-consecutive month period, in violation of Revenue and Taxation
25 Code section 30480, a felony, to wit: Failure to pay \$416,311.57 excise tax to the California
26 Department of Tax and Fee Administration.

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28 ///

1 **COUNT SEVENTY-FIVE**

2 **[UNLICENSED DISTRIBUTOR]**

3 On or about June 25, 2022, at and in the County of San Bernardino, State of California,
4 defendant RAMZI IBRAHIM SABA, BANAYOTIS HADDAD, and OSAMA ZAKOUR, being
5 persons required to obtain a license as a distributor, engaged in business as a distributor without a
6 license, in violation of Revenue and Taxation Code section 30149.

7 It is further alleged that defendant RAMZI IBRAHIM SABA and OSAMA ZAKOUR
8 acted with the intent to defeat or evade an unreported tax liability exceeding twenty-five thousand
9 dollars (\$25,000) within any 12-consecutive month period, in violation of Revenue and Taxation
10 Code section 30480, a felony, to wit: Failure to pay \$416,311.57 excise tax to the California
11 Department of Tax and Fee Administration.

12 It is further alleged that Sacramento County has jurisdiction in this count pursuant to
13 Penal Code section 781.

14
15 **COUNT SEVENTY-SIX**

16 **[FALSE TAX RETURN]**

17 On or about August 17, 2022, at and in the County of Sacramento, State of California,
18 defendants RAMZI IBRAHIM SABA and OSAMA ZAKOUR, being a person required to make,
19 render, sign or verify a tax return for tobacco distributor license number 256-336576, unlawfully
20 filed or caused the filing of a false or fraudulent tax return for the period June 1, 2022 through
21 June 30, 2022, in violation of Revenue and Taxation Code section 30472.

22 It is further alleged that defendant RAMZI IBRAHIM SABA and OSAMA ZAKOUR
23 acted with the intent to defeat or evade an unreported tax liability exceeding twenty-five thousand
24 dollars (\$25,000) within any 12-consecutive month period, in violation of Revenue and Taxation
25 Code section 30480, a felony, to wit: Failure to pay \$202,828.85 excise tax to the California
26 Department of Tax and Fee Administration.

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28 ///

1 **COUNT SEVENTY-SEVEN**

2 **[UNLICENSED DISTRIBUTOR]**

3 On or about July 25, 2022, at and in the County of San Bernardino, State of California,
4 defendant RAMZI IBRAHIM SABA and OSAMA ZAKOUR, being persons required to obtain a
5 license as a distributor, engaged in business as a distributor without a license, in violation of
6 Revenue and Taxation Code section 30149.

7 It is further alleged that defendant RAMZI IBRAHIM SABA and OSAMA ZAKOUR
8 acted with the intent to defeat or evade an unreported tax liability exceeding twenty-five thousand
9 dollars (\$25,000) within any 12-consecutive month period, in violation of Revenue and Taxation
10 Code section 30480, a felony, to wit: Failure to pay \$202,828.85 excise tax to the California
11 Department of Tax and Fee Administration.

12 It is further alleged that Sacramento County has jurisdiction in this count pursuant to
13 Penal Code section 781.

14
15 **R.H. DISTRIBUTION**

16 **COUNT SEVENTY-EIGHT**

17 **[CONSPIRACY]**

18 From on or about December 6, 2021 through November 3, 2022, defendants RAMZI
19 IBRAHIM SABA and BANAYOTIS HADDAD committed the crime of conspiracy, in violation
20 of Penal Code Section 182(a)(1), in that they did unlawfully conspire together, and with other
21 uncharged person or persons, act as unlicensed distributors, in violation of Revenue and Taxation
22 Code sections 30149 and 30480, a felony.

23 It is further alleged that Sacramento County has jurisdiction in this count pursuant to
24 Penal Code section 781, and that pursuant to and for the purpose of carrying out the objectives
25 and purposes of the aforesaid conspiracy, the said defendants committed the following overt
26 act(s):

27 **OVERT ACT ONE**

28 On or about December 6, 2021, in the County of Riverside, State of California, defendant

1 BANAYOTIS HADDAD opened bank account number ending 1897 at JP Morgan Chase Bank.

2 **OVERT ACT TWO**

3 On or about December 10, 2021, through November 3, 2022, in the County of San
4 Bernardino, State of California, defendant RAMZI SABA received invoices from R.H.
5 Distribution, which he placed in a file in his office.

6 **OVERT ACT THREE**

7 On or about January 5, 2022, in the County of San Bernardino, State of California,
8 defendant RAMZI IBRAHIM SABA purchased a cashier's check made payable to Global
9 Tobacco for \$198,921.60.

10 **OVERT ACT FOUR**

11 On or about January 11, 2022, in the County of San Bernardino, State of California,
12 defendant RAMZI IBRAHIM SABA purchased a cashier check made payable to Mecca
13 Enterprises for \$305,247.10.

14 **OVERT ACT FIVE**

15 On or about January 24, 2022, in the County of San Bernardino, State of California,
16 defendant RAMZI IBRAHIM SABA purchased a cashier check made payable to Global Tobacco
17 for \$102,816.

18 **OVERT ACT SIX**

19 On or about April 11, 2022, in the County of Riverside, State of California, defendant
20 BANAYOTIS HADDAD purchased a cashier check made payable to Mecca Enterprises for
21 \$98,005.

22 **OVERT ACT SEVEN**

23 On or about April 20, 2022, in the County of Riverside, State of California, defendant
24 BANAYOTIS HADDAD opened bank account number ending 1343 at PNC Bank.

25 **OVERT ACT EIGHT**

26 On or about April 22, 2022, in the County of Riverside, State of California, defendant
27 BANAYOTIS HADDAD sent a \$102,225.70 wire transfer from PNC Bank account number
28 ending 1343 to Mecca Enterprises.

1 **OVERT ACT NINE**

2 On or about May 3, 2022, in the County of Los Angeles, State of California, defendant
3 BANAYOTIS HADDAD emailed a tobacco license to Farhad Kohanim.

4 **OVERT ACT TEN**

5 On or about May 4, 2022, in the County of Los Angeles, State of California,
6 defendant BANAYOTIS HADDAD provided wire payment instructions to Farhad Kohanim.

7 **OVERT ACT ELEVEN**

8 On or about May 6, 2022, in the County of Riverside, State of California, defendant
9 BANAYOTIS HADDAD sent a \$105,000 wire transfer from PNC Bank account number ending
10 1343 to Ravi's Import Warehouse.

11 **OVERT ACT TWELVE**

12 On or about May 16, 2022, in the County of Riverside, State of California, defendant
13 BANAYOTIS HADDAD purchased a cashier check made payable to Mecca Enterprises for
14 \$245,500.

15 **OVERT ACT THIRTEEN**

16 On or about August 1, 2022, in the County of Los Angeles, State of California, defendant
17 BANAYOTIS HADDAD offered to sell tobacco to Mohammad Khan.

18 **OVERT ACT FOURTEEN**

19 On or about August 15, 2022, in the County of Los Angeles, State of California, defendant
20 BANAYOTIS HADDAD provided wire payment instructions to Mohammad Khan.

21 **OVERT ACT FIFTEEN**

22 On or about September 22, 2022, in the County of San Bernardino, State of California,
23 defendant RAMZI IBRAHIM SABA purchased a cashier check made payable to Global Tobacco
24 for \$36,792.

25 **OVERT ACT SIXTEEN**

26 On or about September 30, 2022, in the County of Riverside, State of California,
27 defendant BANAYOTIS HADDAD sent an email to Farhad Kohanim, asking him to wire funds
28 to Bank of America account number ending 0005.

1 **OVERT ACT SEVENTEEN**

2 On or about October 12, 2022, in the County of San Bernardino, State of California,
3 defendant RAMZI IBRAHIM SABA purchased a cashier check made payable to Global Tobacco
4 for \$36,792.

5 **OVERT ACT EIGHTEEN**

6 On or about October 19, 2022, in the County of Riverside, State of California, defendant
7 BANAYOTIS HADDAD opened bank account number ending 2929 at Bank of America for R.H.
8 Distribution.

9 **OVERT ACT NINETEEN**

10 On or about October 26, 2022, in the County of San Bernardino, State of California,
11 defendant RAMZI IBRAHIM SABA purchased a cashier's check made payable to Global
12 Tobacco totaling \$122,640.

13 **COUNT SEVENTY-NINE**

14 **[UNLICENSED DISTRIBUTOR]**

15
16 On or about December 25, 2021, at and in the County of San Bernardino, State of
17 California, defendants RAMZI IBRAHIM SABA and BANAYOTIS HADDAD, being a person
18 required to obtain a license as a distributor, engaged in business as a distributor without a license,
19 in violation of Revenue and Taxation Code section 30149.

20 It is further alleged that defendants RAMZI IBRAHIM SABA and BANAYOTIS
21 HADDAD acted with the intent to defeat or evade an unreported tax liability exceeding twenty-
22 five thousand dollars (\$25,000) within any 12-consecutive month period, in violation of Revenue
23 and Taxation Code section 30480, a felony, to wit: Failure to pay \$215,344.81 excise tax to the
24 California Department of Tax and Fee Administration.

25 It is further alleged that Sacramento County has jurisdiction in this count pursuant to
26 Penal Code section 781.

1 **COUNT EIGHTY**

2 **[UNLICENSED DISTRIBUTOR]**

3 On or about February 25, 2022, at and in the County of San Bernardino, State of
4 California, defendants RAMZI IBRAHIM SABA and BANAYOTIS HADDAD, being a person
5 required to obtain a license as a distributor, engaged in business as a distributor without a license,
6 in violation of Revenue and Taxation Code section 30149.

7 It is further alleged that defendants RAMZI IBRAHIM SABA and BANAYOTIS
8 HADDAD acted with the intent to defeat or evade an unreported tax liability exceeding twenty-
9 five thousand dollars (\$25,000) within any 12-consecutive month period, in violation of Revenue
10 and Taxation Code section 30480, a felony, to wit: Failure to pay \$306,842.53 excise tax to the
11 California Department of Tax and Fee Administration.

12 It is further alleged that Sacramento County has jurisdiction in this count pursuant to
13 Penal Code section 781.

14
15 **COUNT EIGHTY-ONE**

16 **[UNLICENSED DISTRIBUTOR]**

17 On or about April 25, 2022, at and in the County of San Bernardino, State of California,
18 defendants RAMZI IBRAHIM SABA and BANAYOTIS HADDAD, being a person required to
19 obtain a license as a distributor, engaged in business as a distributor without a license for the, in
20 violation of Revenue and Taxation Code section 30149.

21 It is further alleged that defendants RAMZI IBRAHIM SABA and BANAYOTIS
22 HADDAD acted with the intent to defeat or evade an unreported tax liability exceeding twenty-
23 five thousand dollars (\$25,000) within any 12-consecutive month period, in violation of Revenue
24 and Taxation Code section 30480, a felony, to wit: Failure to pay \$219,237.63 excise tax to the
25 California Department of Tax and Fee Administration.

26 It is further alleged that Sacramento County has jurisdiction in this count pursuant to
27 Penal Code section 781.

1 **COUNT EIGHTY-TWO**

2 **[UNLICENSED DISTRIBUTOR]**

3 On or about May 25, 2022, at and in the County of San Bernardino, State of California,
4 defendants RAMZI IBRAHIM SABA and BANAYOTIS HADDAD, being a person required to
5 obtain a license as a distributor, engaged in business as a distributor without a license for the, in
6 violation of Revenue and Taxation Code section 30149.

7 It is further alleged that defendants RAMZI IBRAHIM SABA and BANAYOTIS
8 HADDAD acted with the intent to defeat or evade an unreported tax liability exceeding twenty-
9 five thousand dollars (\$25,000) within any 12-consecutive month period, in violation of Revenue
10 and Taxation Code section 30480, a felony, to wit: Failure to pay \$63,633.30 excise tax to the
11 California Department of Tax and Fee Administration.

12 It is further alleged that Sacramento County has jurisdiction in this count pursuant to
13 Penal Code section 781.

14 ///

15 **COUNT EIGHTY-THREE**

16 **[UNLICENSED DISTRIBUTOR]**

17 On or about July 25, 2022, at and in the County of San Bernardino, State of California,
18 defendants RAMZI IBRAHIM SABA and BANAYOTIS HADDAD, being a person required to
19 obtain a license as a distributor, engaged in business as a distributor without a license for the, in
20 violation of Revenue and Taxation Code section 30149.

21 It is further alleged that defendants RAMZI IBRAHIM SABA and BANAYOTIS
22 HADDAD acted with the intent to defeat or evade an unreported tax liability exceeding twenty-
23 five thousand dollars (\$25,000) within any 12-consecutive month period, in violation of Revenue
24 and Taxation Code section 30480, a felony, to wit: Failure to pay \$114,939.31 excise tax to the
25 California Department of Tax and Fee Administration.

26 It is further alleged that Sacramento County has jurisdiction in this count pursuant to
27 Penal Code section 781.
28

1 **COUNT EIGHTY-FOUR**

2 **[UNLICENSED DISTRIBUTOR]**

3 On or about August 25, 2022, at and in the County of San Bernardino, State of California,
4 defendants RAMZI IBRAHIM SABA and BANAYOTIS HADDAD, being a person required to
5 obtain a license as a distributor, engaged in business as a distributor without a license for the, in
6 violation of Revenue and Taxation Code section 30149.

7 It is further alleged that defendants RAMZI IBRAHIM SABA and BANAYOTIS
8 HADDAD acted with the intent to defeat or evade an unreported tax liability exceeding twenty-
9 five thousand dollars (\$25,000) within any 12-consecutive month period, in violation of Revenue
10 and Taxation Code section 30480, a felony, to wit: Failure to pay \$87,133.66 excise tax to the
11 California Department of Tax and Fee Administration.

12 It is further alleged that Sacramento County has jurisdiction in this count pursuant to
13 Penal Code section 781.

14
15 **COUNT EIGHTY-FIVE**

16 **[UNLICENSED DISTRIBUTOR]**

17 On or about September 25, 2022, at and in the County of San Bernardino, State of
18 California, defendants RAMZI IBRAHIM SABA and BANAYOTIS HADDAD, being a person
19 required to obtain a license as a distributor, engaged in business as a distributor without a license,
20 in violation of Revenue and Taxation Code section 30149.

21 It is further alleged that defendants RAMZI IBRAHIM SABA and BANAYOTIS
22 HADDAD acted with the intent to defeat or evade an unreported tax liability exceeding twenty-
23 five thousand dollars (\$25,000) within any 12-consecutive month period, in violation of Revenue
24 and Taxation Code section 30480, a felony, to wit: Failure to pay \$246,985.50 excise tax to the
25 California Department of Tax and Fee Administration.

26 It is further alleged that Sacramento County has jurisdiction in this count pursuant to
27 Penal Code section 781.
28

1 **COUNT EIGHTY-SIX**

2 **[UNLICENSED DISTRIBUTOR]**

3 On or about November 25, 2022, at and in the County of San Bernardino, State of
4 California, defendants RAMZI IBRAHIM SABA and BANAYOTIS HADDAD, being a person
5 required to obtain a license as a distributor, engaged in business as a distributor without a license,
6 in violation of Revenue and Taxation Code section 30149.

7 It is further alleged that defendants RAMZI IBRAHIM SABA and BANAYOTIS
8 HADDAD acted with the intent to defeat or evade an unreported tax liability exceeding twenty-
9 five thousand dollars (\$25,000) within any 12-consecutive month period, in violation of Revenue
10 and Taxation Code section 30480, a felony, to wit: Failure to pay \$93,700.95 excise tax to the
11 California Department of Tax and Fee Administration.

12 It is further alleged that Sacramento County has jurisdiction in this count pursuant to
13 Penal Code section 781.

14
15 **COUNT EIGHTY-SEVEN**

16 **[MONEY LAUNDERING]**

17 On or about January 5, 2022, at and in the county of San Bernardino, State of California,
18 defendant RAMZI IBRAHIM SABA willfully and unlawfully conducted a transaction involving
19 a monetary instrument of a total value exceeding \$5,000, with the specific intent to promote,
20 manage, establish, or carry on, or facilitate the promotion, management, establishment, or
21 carrying on of any criminal activity in violation of Penal Code Section 186.10(a)(1), a felony, to
22 wit: \$198,921.60 withdrawn from an account at Alaska USA Federal Credit Union.

23 It is further alleged that Sacramento County has jurisdiction in this count pursuant to
24 Penal Code section 781.

25 **COUNT EIGHTY-EIGHT**

26 **[MONEY LAUNDERING]**

27 On or about January 11, 2022, at and in the county of San Bernardino, State of California,
28 defendant RAMZI IBRAHIM SABA willfully and unlawfully conducted a transaction involving

1 a monetary instrument of a total value exceeding \$5,000, with the specific intent to promote,
2 manage, establish, or carry on, or facilitate the promotion, management, establishment, or
3 carrying on of any criminal activity in violation of Penal Code Section 186.10(a)(1), a felony, to
4 wit: \$305,247.10 withdrawn from an account at Alaska USA Federal Credit Union.

5 It is further alleged that Sacramento County has jurisdiction in this count pursuant to
6 Penal Code section 781.

7
8 **COUNT EIGHTY-NINE**

9 **[MONEY LAUNDERING]**

10 On or about January 24, 2022, at and in the county of San Bernardino, State of California,
11 defendant RAMZI IBRAHIM SABA willfully and unlawfully conducted a transaction involving
12 a monetary instrument of a total value exceeding \$5,000, with the specific intent to promote,
13 manage, establish, or carry on, or facilitate the promotion, management, establishment, or
14 carrying on of any criminal activity in violation of Penal Code Section 186.10(a)(1), a felony, to
15 wit: \$102,816 withdrawn from an account at Alaska USA Federal Credit Union.

16 It is further alleged that Sacramento County has jurisdiction in this count pursuant to
17 Penal Code section 781.

18
19 **COUNT NINETY**

20 **[MONEY LAUNDERING]**

21 On or about April 11, 2022, at and in the county of Riverside, State of California,
22 defendant BANAYOTIS HADDAD willfully and unlawfully conducted a transaction involving a
23 monetary instrument of a total value exceeding \$5,000, with the specific intent to promote,
24 manage, establish, or carry on, or facilitate the promotion, management, establishment, or
25 carrying on of any criminal activity in violation of Penal Code Section 186.10(a)(1), a felony, to
26 wit: \$98,005 withdrawn from an account at JP Morgan Chase Bank.

27 It is further alleged that Sacramento County has jurisdiction in this count pursuant to
28 Penal Code section 781.

1
2 **COUNT NINETY-ONE**

3 **[MONEY LAUNDERING]**

4 On or about April 22, 2022, at and in the county of Riverside, State of California,
5 defendant BANAYOTIS HADDAD willfully and unlawfully conducted a transaction involving a
6 monetary instrument of a total value exceeding \$5,000, with the specific intent to promote,
7 manage, establish, or carry on, or facilitate the promotion, management, establishment, or
8 carrying on of any criminal activity in violation of Penal Code Section 186.10(a)(1), a felony, to
9 wit: \$102,225.70 wire transfer from an account at PNC Bank.

10 It is further alleged that Sacramento County has jurisdiction in this count pursuant to
11 Penal Code section 781.
12

13 **COUNT NINETY-TWO**

14 **[MONEY LAUNDERING]**

15 On or about May 6, 2022, at and in the county of Riverside, State of California, defendant
16 BANAYOTIS HADDAD willfully and unlawfully conducted a transaction involving a monetary
17 instrument of a total value exceeding \$5,000, with the specific intent to promote, manage,
18 establish, or carry on, or facilitate the promotion, management, establishment, or carrying on of
19 any criminal activity in violation of Penal Code Section 186.10(a)(1), a felony, to wit: \$105,000
20 wire transfer from an account at PNC Bank.

21 It is further alleged that Sacramento County has jurisdiction in this count pursuant to
22 Penal Code section 781.

23 ///

24 ///

25 **COUNT NINETY-THREE**

26 **[MONEY LAUNDERING]**

27 On or about May 16, 2022, at and in the county of Riverside, State of California,
28 defendant BANAYOTIS HADDAD willfully and unlawfully conducted a transaction involving a

1 monetary instrument of a total value exceeding \$5,000, with the specific intent to promote,
2 manage, establish, or carry on, or facilitate the promotion, management, establishment, or
3 carrying on of any criminal activity in violation of Penal Code Section 186.10(a)(1), a felony, to
4 wit: \$245,500 withdrawn from an account at JP Morgan Chase Bank.

5 It is further alleged that Sacramento County has jurisdiction in this count pursuant to
6 Penal Code section 781.

7
8 **COUNT NINETY-FOUR**

9 **[MONEY LAUNDERING]**

10 On or about September 22, 2022, at and in the county of San Bernardino, State of
11 California, defendant RAMZI IBRAHIM SABA willfully and unlawfully conducted a transaction
12 involving a monetary instrument of a total value exceeding \$5,000, with the specific intent to
13 promote, manage, establish, or carry on, or facilitate the promotion, management, establishment,
14 or carrying on of any criminal activity in violation of Penal Code Section 186.10(a)(1), a felony,
15 to wit: \$36,792 withdrawn from an account at Chino Commercial Bank.

16 It is further alleged that Sacramento County has jurisdiction in this count pursuant to
17 Penal Code section 781.

18
19 **COUNT NINETY-FIVE**

20 **[MONEY LAUNDERING]**

21 On or about October 12, 2022, at and in the county of San Bernardino, State of California,
22 defendant RAMZI IBRAHIM SABA willfully and unlawfully conducted a transaction involving
23 a monetary instrument of a total value exceeding \$5,000, with the specific intent to promote,
24 manage, establish, or carry on, or facilitate the promotion, management, establishment, or
25 carrying on of any criminal activity in violation of Penal Code Section 186.10(a)(1), a felony, to
26 wit: \$36,792 withdrawn from an account at Chino Commercial Bank.

27 It is further alleged that Sacramento County has jurisdiction in this count pursuant to
28 Penal Code section 781.

1
2 **COUNT NINETY-SIX**

3 **[MONEY LAUNDERING]**

4 On or about October 26, 2022, at and in the county of San Bernardino, State of California,
5 defendant RAMZI IBRAHIM SABA willfully and unlawfully conducted a transaction involving
6 a monetary instrument of a total value exceeding \$5,000, with the specific intent to promote,
7 manage, establish, or carry on, or facilitate the promotion, management, establishment, or
8 carrying on of any criminal activity in violation of Penal Code Section 186.10(a)(1), a felony, to
9 wit: \$122,640 withdrawn from an account at Chino Commercial Bank.

10 It is further alleged that Sacramento County has jurisdiction in this count pursuant to
11 Penal Code section 781.
12

13 **ZAG DISTRO, INC.**

14 **COUNT NINETY-SEVEN**

15 **[CONSPIRACY]**

16 From on or about August 3, 2023, through January 19, 2024, defendants OSAMA
17 ZAKOUR and JERIES DABABNEH committed the crime of conspiracy, in violation of Penal
18 Code Section 182(a)(1), in that they did unlawfully conspire together, and with other uncharged
19 person or persons, to file false tax returns, in violation of Revenue and Taxation Code sections
20 30472 and 30480, a felony.

21 It is further alleged that Sacramento County has jurisdiction in this count pursuant to
22 Penal Code section 781, and that pursuant to and for the purpose of carrying out the objectives
23 and purposes of the aforesaid conspiracy, the said defendants committed the following overt
24 act(s):

25 **OVERT ACT ONE**

26 On or about August 3, 2023, in the county of San Bernardino, defendant OSAMA
27 ZAKOUR completed an Authorization Agreement for Preauthorized Payments for Ravi's Import
28 Warehouse, Inc.

1 **OVERT ACT TWO**

2 On or about August 9, 2023, in the county of San Bernardino, defendant OSAMA
3 ZAKOUR completed an ACH Debit Authorization for Mecca Enterprises, Inc.

4 **OVERT ACT THREE**

5 On or about August 16, 2023, in the county of San Bernardino, defendant OSAMA
6 ZAKOUR completed an ACH Debit Authorization and an Application for Direct Purchase for
7 Good Times.

8 **OVERT ACT FOUR**

9 On or about January 5, 2024, in the county of San Bernardino, defendant JERIES
10 DABABNEH sent a text message to Sam Grair.

11 **OVERT ACT FIVE**

12 On or about January 19, 2024, in the county of San Bernardino, defendant JERIES
13 DABABNEH sent a text message to Sam Grair.

14
15 **COUNT ONE NINETY-EIGHT**

16 **[FALSE TAX RETURN]**

17 On or about September 23, 2023, at and in the County of Sacramento, State of California,
18 defendants OSAMA ZAKOUR and JERIES DABABNEH, being a person required to make,
19 render, sign or verify a tax return for tobacco distributor license number 235-791648, unlawfully
20 filed or caused the filing of a false or fraudulent tax return for the period August 1, 2023 through
21 August 30, 2023, in violation of Revenue and Taxation Code section 30472.

22 It is further alleged that defendant OSAMA ZAKOUR and JERIES DABABNEH acted
23 with the intent to defeat or evade an unreported tax liability exceeding twenty-five thousand
24 dollars (\$25,000) within any 12-consecutive month period, in violation of Revenue and Taxation
25 Code section 30480, a felony, to wit: Failure to pay \$573,239 excise tax to the California
26 Department of Tax and Fee Administration.

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28 ///

1 **COUNT NINETY-NINE**

2 **[FALSE TAX RETURN]**

3 On or about November 3, 2023, at and in the County of Sacramento, State of California,
4 defendant OSAMA ZAKOUR and JERIES DABABNEH, being a person required to make,
5 render, sign or verify a tax return for tobacco distributor license number 235-791648, unlawfully
6 filed or caused the filing of a false or fraudulent tax return for the period September 1, 2023
7 through September 30, 2023, in violation of Revenue and Taxation Code section 30472.

8 It is further alleged that defendant OSAMA ZAKOUR and JERIES DABABNEH acted
9 with the intent to defeat or evade an unreported tax liability exceeding twenty-five thousand
10 dollars (\$25,000) within any 12-consecutive month period, in violation of Revenue and Taxation
11 Code section 30480, a felony, to wit: Failure to pay \$1,016,217 excise tax to the California
12 Department of Tax and Fee Administration.

13
14 **COUNT ONE HUNDRED**

15 **[FALSE TAX RETURN]**

16 On or about November 23, 2023, at and in the County of Sacramento, State of California,
17 defendant OSAMA ZAKOUR and JERIES DABABNEH, being a person required to make,
18 render, sign or verify a tax return for tobacco distributor license number 235-791648, unlawfully
19 filed or caused the filing of a false or fraudulent tax return for the period October 1, 2023 through
20 October 31, 2023, in violation of Revenue and Taxation Code section 30472.

21 It is further alleged that defendant OSAMA ZAKOUR and JERIES DABABNEH acted
22 with the intent to defeat or evade an unreported tax liability exceeding twenty-five thousand
23 dollars (\$25,000) within any 12-consecutive month period, in violation of Revenue and Taxation
24 Code section 30480, a felony, to wit: Failure to pay \$682,268 excise tax to the California
25 Department of Tax and Fee Administration.

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1 **COUNT ONE HUNDRED ONE**

2 **[FALSE TAX RETURN]**

3 On or about December 14, 2023, at and in the County of Sacramento, State of California,
4 defendant OSAMA ZAKOUR and JERIES DABABNEH, being a person required to make,
5 render, sign or verify a tax return for tobacco distributor license number 235-791648, unlawfully
6 filed or caused the filing of a false or fraudulent tax return for the period November 1, 2023
7 through November 30, 2023, in violation of Revenue and Taxation Code section 30472.

8 It is further alleged that defendant OSAMA ZAKOUR and JERIES DABABNEH acted
9 with the intent to defeat or evade an unreported tax liability exceeding twenty-five thousand
10 dollars (\$25,000) within any 12-consecutive month period, in violation of Revenue and Taxation
11 Code section 30480, a felony, to wit: Failure to pay \$494,620 excise tax to the California
12 Department of Tax and Fee Administration.

13
14 **COUNT ONE HUNDRED TWO**

15 **[FALSE TAX RETURN]**

16 On or about January 5, 2024, at and in the County of Sacramento, State of California,
17 defendant OSAMA ZAKOUR and JERIES DABABNEH, being a person required to make,
18 render, sign or verify a tax return for tobacco distributor license number 235-791648, unlawfully
19 filed or caused the filing of a false or fraudulent tax return for the period December 1, 2023
20 through December 31, 2023, in violation of Revenue and Taxation Code section 30472.

21 It is further alleged that defendant OSAMA ZAKOUR and JERIES DABABNEH acted
22 with the intent to defeat or evade an unreported tax liability exceeding twenty-five thousand
23 dollars (\$25,000) within any 12-consecutive month period, in violation of Revenue and Taxation
24 Code section 30480, a felony, to wit: Failure to pay \$201,476 excise tax to the California
25 Department of Tax and Fee Administration.

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1 **COUNT ONE HUNDRED THREE**

2 **[FALSE TAX RETURN]**

3 On or about February 20, 2024, at and in the County of Sacramento, State of California,
4 defendant OSAMA ZAKOUR and JERIES DABABNEH, being a person required to make,
5 render, sign or verify a tax return for tobacco distributor license number 235-791648, unlawfully
6 filed or caused the filing of a false or fraudulent tax return for the period January 1, 2024 through
7 January 31, 2024, in violation of Revenue and Taxation Code section 30472.

8 It is further alleged that defendant OSAMA ZAKOUR and JERIES DABABNEH acted
9 with the intent to defeat or evade an unreported tax liability exceeding twenty-five thousand
10 dollars (\$25,000) within any 12-consecutive month period, in violation of Revenue and Taxation
11 Code section 30480, a felony, to wit: Failure to pay \$1,086,370 excise tax to the California
12 Department of Tax and Fee Administration.

13
14 **COUNT ONE HUNDRED FOUR**

15 **[UNLICENSED DISTRIBUTOR]**

16 On or about February 25, 2024, at and in the County of Los Angeles, State of California,
17 defendant JERIES DABABNEH, being a person required to obtain a license as a distributor,
18 engaged in business as a distributor without a license, in violation of Revenue and Taxation Code
19 section 30149.

20 It is further alleged that defendant JERIES DABABNEH acted with the intent to defeat or
21 evade an unreported tax liability exceeding twenty-five thousand dollars (\$25,000) within any 12-
22 consecutive month period, in violation of Revenue and Taxation Code section 30480, a felony, to
23 wit: Failure to pay \$1,086,370 excise tax to the California Department of Tax and Fee
24 Administration.

25 It is further alleged that Sacramento County has jurisdiction in this count pursuant to
26 Penal Code section 781.

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1 **COUNT ONE HUNDRED FIVE**

2 **[FALSE TAX RETURN]**

3 On or about March 21, 2024, at and in the County of Sacramento, State of California,
4 defendant OSAMA ZAKOUR and JERIES DABABNEH, being a person required to make,
5 render, sign or verify a tax return for tobacco distributor license number 235-791648, unlawfully
6 filed or caused the filing of a false or fraudulent tax return for the period February 1, 2024
7 through February 29, 2024, in violation of Revenue and Taxation Code section 30472.

8 It is further alleged that defendant OSAMA ZAKOUR and JERIES DABABNEH acted
9 with the intent to defeat or evade an unreported tax liability exceeding twenty-five thousand
10 dollars (\$25,000) within any 12-consecutive month period, in violation of Revenue and Taxation
11 Code section 30480, a felony, to wit: Failure to pay \$1,140,559 excise tax to the California
12 Department of Tax and Fee Administration.

13
14 **COUNT ONE HUNDRED SIX**

15 **[UNLICENSED DISTRIBUTOR]**

16 On or about March 25, 2024, at and in the County of Los Angeles, State of California,
17 defendant JERIES DABABNEH, being a person required to obtain a license as a distributor,
18 engaged in business as a distributor without a license, in violation of Revenue and Taxation Code
19 section 30149.

20 It is further alleged that defendant JERIES DABABNEH acted with the intent to defeat or
21 evade an unreported tax liability exceeding twenty-five thousand dollars (\$25,000) within any 12-
22 consecutive month period, in violation of Revenue and Taxation Code section 30480, a felony, to
23 wit: Failure to pay \$1,140,559 excise tax to the California Department of Tax and Fee
24 Administration.

25 It is further alleged that Sacramento County has jurisdiction in this count pursuant to
26 Penal Code section 781.

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1 **COUNT ONE HUNDRED SEVEN**

2 **[FALSE TAX RETURN]**

3 On or about April 23, 2024, at and in the County of Sacramento, State of California,
4 defendant OSAMA ZAKOUR and JERIES DABABNEH, being a person required to make,
5 render, sign or verify a tax return for tobacco distributor license number 235-791648, unlawfully
6 filed or caused the filing of a false or fraudulent tax return for the period March 1, 2024 through
7 March 31, 2024, in violation of Revenue and Taxation Code section 30472.

8 It is further alleged that defendant OSAMA ZAKOUR and JERIES DABABNEH acted
9 with the intent to defeat or evade an unreported tax liability exceeding twenty-five thousand
10 dollars (\$25,000) within any 12-consecutive month period, in violation of Revenue and Taxation
11 Code section 30480, a felony, to wit: Failure to pay \$1,304,045 excise tax to the California
12 Department of Tax and Fee Administration.

13
14 **COUNT ONE HUNDRED EIGHT**

15 **[UNLICENSED DISTRIBUTOR]**

16 On or about April 25, 2024, at and in the County of Los Angeles, State of California,
17 defendant JERIES DABABNEH, being a person required to obtain a license as a distributor,
18 engaged in business as a distributor without a license, in violation of Revenue and Taxation Code
19 section 30149.

20 It is further alleged that defendant JERIES DABABNEH acted with the intent to defeat or
21 evade an unreported tax liability exceeding twenty-five thousand dollars (\$25,000) within any 12-
22 consecutive month period, in violation of Revenue and Taxation Code section 30480, a felony, to
23 wit: Failure to pay \$1,304,045 excise tax to the California Department of Tax and Fee
24 Administration.

25 It is further alleged that Sacramento County has jurisdiction in this count pursuant to
26 Penal Code section 781.

27 ///

28 ///

1 **COUNT ONE HUNDRED NINE**

2 **[FALSE TAX RETURN]**

3 On or about May 27, 2024, at and in the County of Sacramento, State of California,
4 defendant OSAMA ZAKOUR and JERIES DABABNEH, being a person required to make,
5 render, sign or verify a tax return for tobacco distributor license number 235-791648, unlawfully
6 filed or caused the filing of a false or fraudulent tax return for the period April 1, 2024 through
7 April 30, 2024, in violation of Revenue and Taxation Code section 30472.

8 It is further alleged that defendant OSAMA ZAKOUR and JERIES DABABNEH acted
9 with the intent to defeat or evade an unreported tax liability exceeding twenty-five thousand
10 dollars (\$25,000) within any 12-consecutive month period, in violation of Revenue and Taxation
11 Code section 30480, a felony, to wit: Failure to pay \$547,404 excise tax to the California
12 Department of Tax and Fee Administration.

13
14 **COUNT ONE HUNDRED TEN**

15 **[UNLICENSED DISTRIBUTOR]**

16 On or about May 25, 2024, at and in the County of Los Angeles, State of California,
17 defendant JERIES DABABNEH, being a person required to obtain a license as a distributor,
18 engaged in business as a distributor without a license, in violation of Revenue and Taxation Code
19 section 30149.

20 It is further alleged that defendant JERIES DABABNEH acted with the intent to defeat or
21 evade an unreported tax liability exceeding twenty-five thousand dollars (\$25,000) within any 12-
22 consecutive month period, in violation of Revenue and Taxation Code section 30480, a felony, to
23 wit: Failure to pay \$547,404 excise tax to the California Department of Tax and Fee
24 Administration.

25 It is further alleged that Sacramento County has jurisdiction in this count pursuant to
26 Penal Code section 781.

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1 **COUNT ONE HUNDRED ELEVEN**

2 **[MONEY LAUNDERING]**

3 On or about August 28, 2023, at and in the county of San Bernardino, State of California,
4 defendant OSAMA ZAKOUR willfully and unlawfully conducted a transaction involving a
5 monetary instrument of a total value exceeding \$5,000, with the specific intent to promote,
6 manage, establish, or carry on, or facilitate the promotion, management, establishment, or
7 carrying on of any criminal activity in violation of Penal Code Section 186.10(a)(1), a felony, to
8 wit: \$200,000 wire transfer from an account at Comerica Bank.

9 It is further alleged that Sacramento County has jurisdiction in this count pursuant to
10 Penal Code section 781.

11
12 **COUNT ONE HUNDRED TWELVE**

13 **[MONEY LAUNDERING]**

14 On or about September 5, 2023 through September 27, 2023, at and in the county of San
15 Bernardino, State of California, defendant OSAMA ZAKOUR willfully and unlawfully
16 conducted a transaction involving a monetary instrument of a total value exceeding \$25,000, with
17 the specific intent to promote, manage, establish, or carry on, or facilitate the promotion,
18 management, establishment, or carrying on of any criminal activity in violation of Penal Code
19 Section 186.10(a)(1), a felony, to wit: \$1,071,432.50 electronic transfer from an account at
20 Comerica Bank.

21 It is further alleged that Sacramento County has jurisdiction in this count pursuant to
22 Penal Code section 781.

23
24 **COUNT ONE HUNDRED THIRTEEN**

25 **[MONEY LAUNDERING]**

26 On or about October 2, 2023 through October 26, 2023, at and in the county of San
27 Bernardino, State of California, defendant OSAMA ZAKOUR willfully and unlawfully
28 conducted a transaction involving a monetary instrument of a total value exceeding \$25,000, with

1 the specific intent to promote, manage, establish, or carry on, or facilitate the promotion,
2 management, establishment, or carrying on of any criminal activity in violation of Penal Code
3 Section 186.10(a)(1), a felony, to wit: \$885,291.50 electronic transfer from an account at
4 Comerica Bank.

5 It is further alleged that Sacramento County has jurisdiction in this count pursuant to
6 Penal Code section 781.

7
8 **COUNT ONE HUNDRED FOURTEEN**

9 **[MONEY LAUNDERING]**

10 On or about November 3, 2023 through November 29, 2023, at and in the county of San
11 Bernardino, State of California, defendant OSAMA ZAKOUR willfully and unlawfully
12 conducted a transaction involving a monetary instrument of a total value exceeding \$25,000, with
13 the specific intent to promote, manage, establish, or carry on, or facilitate the promotion,
14 management, establishment, or carrying on of any criminal activity in violation of Penal Code
15 Section 186.10(a)(1), a felony, to wit: \$1,060,406 electronic transfer from an account at Comerica
16 Bank.

17 It is further alleged that Sacramento County has jurisdiction in this count pursuant to
18 Penal Code section 781.

19
20 **COUNT ONE HUNDRED FIFTEEN**

21 **[MONEY LAUNDERING]**

22 On or about December 1, 2023 through December 26, 2023, at and in the county of San
23 Bernardino, State of California, defendant OSAMA ZAKOUR willfully and unlawfully
24 conducted a transaction involving a monetary instrument of a total value exceeding \$25,000, with
25 the specific intent to promote, manage, establish, or carry on, or facilitate the promotion,
26 management, establishment, or carrying on of any criminal activity in violation of Penal Code
27 Section 186.10(a)(1), a felony, to wit: \$1,037,046.57 electronic transfer from an account at
28 Comerica Bank.

1 It is further alleged that Sacramento County has jurisdiction in this count pursuant to
2 Penal Code section 781.

3
4 **COUNT ONE HUNDRED SIXTEEN**

5 **[MONEY LAUNDERING]**

6 On or about January 3, 2024 through January 29, 2024, at and in the county of San
7 Bernardino, State of California, defendant OSAMA ZAKOUR willfully and unlawfully
8 conducted a transaction involving a monetary instrument of a total value exceeding \$25,000, with
9 the specific intent to promote, manage, establish, or carry on, or facilitate the promotion,
10 management, establishment, or carrying on of any criminal activity in violation of Penal Code
11 Section 186.10(a)(1), a felony, to wit: \$1,746,227.97 electronic transfer from an account at
12 Comerica Bank.

13 It is further alleged that Sacramento County has jurisdiction in this count pursuant to
14 Penal Code section 781.

15 **COUNT ONE HUNDRED SEVENTEEN**

16 **[MONEY LAUNDERING]**

17 On or about March 5, 2024 through March 27, 2024, at and in the county of San
18 Bernardino, State of California, defendant OSAMA ZAKOUR willfully and unlawfully
19 conducted a transaction involving a monetary instrument of a total value exceeding \$25,000, with
20 the specific intent to promote, manage, establish, or carry on, or facilitate the promotion,
21 management, establishment, or carrying on of any criminal activity in violation of Penal Code
22 Section 186.10(a)(1), a felony, to wit: \$2,271,956 electronic transfer from an account at Comerica
23 Bank.

24 It is further alleged that Sacramento County has jurisdiction in this count pursuant to
25 Penal Code section 781.

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1
2 **COUNT ONE HUNDRED EIGHTEEN**

3 **[MONEY LAUNDERING]**

4 On or about April 1, 2024 through April 24, 2024, at and in the county of San Bernardino,
5 State of California, defendant OSAMA ZAKOUR willfully and unlawfully conducted a
6 transaction involving a monetary instrument of a total value exceeding \$25,000, with the specific
7 intent to promote, manage, establish, or carry on, or facilitate the promotion, management,
8 establishment, or carrying on of any criminal activity in violation of Penal Code Section
9 186.10(a)(1), a felony, to wit: \$1,313,194 electronic transfer from an account at Comerica Bank.

10 It is further alleged that Sacramento County has jurisdiction in this count pursuant to
11 Penal Code section 781.
12

13 **SPECIAL ALLEGATION ONE**

14 **[WHITE COLLAR CRIME ENHANCEMENT IN EXCESS OF \$500,000]**

15 It is further alleged, pursuant to Penal Code Section 186.11(a)(2), that the offenses set
16 forth in Counts One through Ten, Twenty through Twenty-Six, Forty-Two through Fifty-Seven,
17 Sixty-Seven through Eighty-Six, and Ninety-Eight through One Hundred Eleven are related
18 felonies, a material element of which is fraud, which involve a pattern of related felony conduct,
19 and the pattern of related felony conduct involves the taking or loss by another person or entity of
20 more than five hundred thousand dollars (\$500,000).

21 NOTICE: A conviction of this offense excludes the defendant from a sentence of
22 imprisonment in the county jail pursuant to Penal Code section 1170(h).
23

24 **SPECIAL ALLEGATION TWO**

25 **[STATUTE OF LIMITATIONS – TOLLING OF TIME PERIOD]**

26 It is further alleged pursuant to Penal Code section 804(d), that the offenses alleged in
27 Counts One through Nineteen of this Indictment have been pending in the Superior Court of
28

1 California, County of Riverside, in Case No. RIF2400816, since February 21, 2024, when an
2 arrest warrant was issued for defendant BANAYOTIS HADDAD on the same charges.

3 It is further alleged pursuant to Penal Code section 804(d), that the offenses alleged in
4 Counts Forty-Two through Sixty-Six of this Indictment have been pending in the Superior Court
5 of California, County of Sacramento, in Case No. 23FE012026, since August 3, 2023, when an
6 arrest warrant was issued for defendant RAMZI IBRAHIM SABA on the same charges.

7 It is further alleged pursuant to Penal Code section 804(d), that the offenses alleged in
8 Counts Sixty-Seven through Seventy-Seven of this Indictment have been pending in the Superior
9 Court of California, County of Sacramento, in Case No. 24FE006863, since April 23, 2024, when
10 arrest warrants were issued for defendants OSAMA ZAKOUR and RAMZI IBRAHIM SABA on
11 the same charges.

12 Thus, the issuance of the arrest warrants tolled the statute of limitations pursuant to Penal
13 Code section 803(b).

14 SPECIAL ALLEGATION THREE

15 [STATUTE OF LIMITATIONS – PROSECUTION WITHIN SIX YEARS]

16 It is further alleged that the overt acts alleged in Count Twenty are continuing offenses,
17 and that the last overt act committed in furtherance of the conspiracy to file false tax returns was
18 on December 24, 2019.

19 It is further alleged that the overt acts alleged in Count Seventy-Eight are continuing
20 offenses, and that the last overt act committed in furtherance of the conspiracy to file false tax
21 returns was on November 3, 2022.

22 It is further alleged that the overt acts alleged in Count Ninety-Seven are continuing
23 offenses, and that the last overt act committed in furtherance of the conspiracy to file false tax
24 returns was on January 19, 2024.

25 It is also alleged, pursuant to Revenue and Taxation Code Section 30481, that the statute
26 of limitation for filing false tax returns is six years after commission of the offense. Pursuant to
27 *People v. Dalton* (2019 7 Cal.5th 166), the statute of limitations for conspiracy is the same as the
28 underlying offense. Thus, prosecution for the offense is within the statute of limitations.

1
2 **SPECIAL ALLEGATION FOUR**

3 **[STATUTE OF LIMITATIONS – PROSECUTION WITHIN SIX YEARS]**

4 It is further alleged, pursuant to Revenue and Taxation Code Section 30481, that
5 prosecution for the offenses set forth in Counts Twenty-One through Twenty-Six, Seventy-Eight
6 through Eighty-Six, and Ninety-Seven through One Hundred Ten is six years. It is also alleged
7 that false tax returns were filed beginning on April 12, 2019. Thus, prosecution for the offenses
8 have been instituted within six years after commission of the offenses.
9

10 **SPECIAL ALLEGATION FIVE**

11 **[STATUTE OF LIMITATIONS – DISCOVERY WITHIN THREE YEARS]**

12 It is further alleged pursuant to Penal Code section 801.5, that prosecution for the offenses
13 alleged in Counts Twenty-Seven through Forty-One, Counts Eighty-Six through Ninety-Six, and
14 Counts One Hundred Eleven through One Hundred Eighteen is three years after the discovery of
15 the commission of the offense.

16 It is further alleged pursuant to Penal Code section 803(c), that the offenses set forth in
17 Counts Twenty-Seven through Forty-One were not discovered until at least March 21, 2022. On
18 February 23, 2022 and March 1, 2022, investigators from the California Department of Justice
19 served search warrants at JP Morgan Chase Bank and Mission federal Credit union, for records
20 related to defendant JOSEF FRIWAT. On March 21, 2022 and April 6, 2022, the aforementioned
21 banks provided the requested records. A subsequent review of the records revealed that
22 defendant RAMZI IBRAHIM SABA sent wire payments to defendant JOSEF FRIWAT, and that
23 defendant JOSEF FRIWAT sent wire payments to Mecca Enterprises as payment for tobacco
24 purchases. Prior to receipt of the bank records, investigators had no actual or constructive
25 knowledge that one or more bank accounts was being used to facilitate the purchase of tobacco.


26 It is further alleged pursuant to Penal Code section 803(c), that the offenses set forth in
27 Counts Eighty-Six through Ninety-Six were not discovered until at least September 15, 2023. On
28 August 21, 2023 and May 9, 2024, investigators from the California Department of Justice served

1 search warrants at JP Morgan Chase Bank, Alaska Federal Credit Union and Chino Commercial
2 Bank, for records related to defendants RAMZI IBRAHIM SABA and BANAYOTIS HADDAD.
3 On September 15, 2023, June 4, 2024 and July 8, 2024, the aforementioned banks provided the
4 requested records. A subsequent review of the records revealed that defendants RAMZI
5 IBRAHIM SABA and BANAYOTIS HADDAD sent wire payments to Mecca Enterprises and
6 Global Tobacco as payment for tobacco purchases. Prior to receipt of the bank records,
7 investigators had no actual or constructive knowledge that one or more bank accounts was being
8 used to facilitate the purchase of tobacco.

9 It is further alleged pursuant to Penal Code section 803(c), that the offenses set forth in
10 Counts One Hundred Eleven through One Hundred Eighteen were not discovered until at least
11 February 4, 2025. On January 21, 2025, investigators from the California Department of Justice
12 served a search warrant at Comerica Bank, for records related to defendant OSAMA ZAKOUR.
13 On February 4, 2025 and February 14, 2025, Comerica Bank provided the requested records. A
14 subsequent review of the records revealed that defendant OSAMA ZAKOUR sent wire payments
15 to Mecca Enterprises, J&D Enterprises, Ravi's Import Warehouse, and Good Times USA as
16 payment for tobacco purchases. Prior to receipt of the bank records, investigators had no actual
17 or constructive knowledge that one or more bank accounts was being used to facilitate the
18 purchase of tobacco.

19
20 * * * * *

21 A TRUE BILL, and with a finding that the requirements of Penal Code section 923(a) have been
22 satisfied.

23 
24 Foreperson of the Grand Jury Juror #

25 Dated: 03/14/25
26
27
28