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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

D-1 GHAZI MANNI,
D-2 MITCHELL EDWARD KARAM, and
D-3 RICARDO ALFREDO VALDES,

Defendants.
_____/

Case:2:09-cr-20193
Judge: Roberts, Victoria A
MJ: Whalen, R. Steven
Filed: 05-06-2009 At 12:30 PM
IND USA VS MANNI ET AL (LH)

VIOLATIONS: 18 U.S.C. §§ 224, 1349, and 1952.

INDICTMENT

THE GRAND JURY CHARGES THAT:

COUNT ONE.

(18 U.S.C. § 1349 - Conspiracy to Commit Wire Fraud)

D-1 GHAZI MANNI
D-2 MITCHELL EDWARD KARAM
D-3 RICARDO ALFREDO VALDES

A. GENERAL ALLEGATIONS.

At all times material to this Indictment:

1. The pari-mutuel wagering system was used in gambling on sporting events of relatively short duration in which participants finish in a ranked order, including thoroughbred horse races. The pari-mutuel wagering system on races was a betting system in which the

winners divided the total amount wagered by all bettors, after deducting management expenses and taxes, in proportion to the sums they had wagered individually and with regard to the odds assigned to particular outcomes.

2. The transmittal, re-transmittal, reception, and rebroadcast of television or radio signals, by satellite or other electrical or electronic means, of thoroughbred horse races which were occurring live at an in-state location to one or more out-of-state locations, or the receiving at an in-state location of events which were occurring live at an out-of-state location, known as simulcasting, allowed pari-mutuel wagering by bettors, who could bet on races without actually being present to observe them in person, at facilities outside of the state where the race was occurring live. The simulcasting of races also involved the transmission of pari-mutuel wagering information to a central site, so that all bettors wherever they were located could participate in the same pari-mutuel betting pool.

3. Live thoroughbred horse races took place at various venues within the United States of America. These venues included Tampa Bay Downs which was located in Tampa, Florida, Delaware Park which was located in Stanton, Delaware, and Great Lakes Downs which was located in Muskegon, Michigan.

4. Tampa Bay Downs was licensed by the State of Florida to conduct live thoroughbred horse racing and to offer pari-mutuel wagering at its facility in Tampa, Florida. These live thoroughbred horse races were simulcast to various other locations, including locations outside the State of Florida, to allow off-track pari-mutuel wagering on these races.

5. Delaware Park was licensed by the State of Delaware to conduct live thoroughbred horse racing and to offer pari-mutuel wagering at its facility in Stanton, Delaware. These live

thoroughbred horse races were simulcast to various other locations, including locations outside the State of Delaware to allow off-track pari-mutuel wagering on these races.

6. Great Lakes Downs was licensed by the State of Michigan to conduct live thoroughbred horse racing and to offer pari-mutuel wagering at its facility in Muskegon, Michigan. These live thoroughbred horse races were simulcast to various other locations, including locations outside the State of Michigan, to allow off-track pari-mutuel wagering on these races.

7. Among the locations that received simulcasts and that offered pari-mutuel wagering on the thoroughbred horse races that were taking place live at Tampa Bay Downs, Delaware Park, and Great Lakes Downs were Northville Downs, which was located in Northville, Michigan, and Hazel Park Harness Raceway, which was located in Hazel Park, Michigan.

8. Individuals who sought employment as jockeys to ride thoroughbred horses in horse racing contests held in the States of Florida, Delaware, and Michigan were required to be licensed, and were thereby subject to various laws, rules and regulations.

9. These various laws, rules and regulations of the States of Florida, Delaware, and Michigan generally provided that all jockeys were expected to give their best effort to win all races in which they participated; that during races any handling of their horses other than for the purpose of winning was forbidden; and that every horse in every race must have been ridden so as to win or finish as near as possible to first and demonstrate the best and fastest performance of which it was capable at the time.

10. RICARDO ALFREDO VALDES, Defendant herein, was a licensed jockey who rode thoroughbred race horses at Tampa Bay Downs, located in Tampa, Florida, and at Delaware

Park, located in Stanton, Delaware.

B. THE CONSPIRACY.

1. From at least in or about December 2005 through at least in or about December 2006, in the Eastern District of Michigan and elsewhere, GHAZI MANNI, MITCHELL EDWARD KARAM, and RICARDO ALFREDO VALDES, Defendants herein, and others known and unknown to the Grand Jury, did unlawfully, willfully, and knowingly combine, conspire, confederate, and agree together and with each other to commit an offense against the United States, to wit: to violate Title 18, United States Code, section 1343.

2. It was a part and object of the conspiracy that GHAZI MANNI, MITCHELL EDWARD KARAM, and RICARDO ALFREDO VALDES, Defendants herein, and others known and unknown to the Grand Jury, having devised and intending to devise a scheme and artifice to defraud, and for obtaining money and property by means of false and fraudulent pretenses and representations, unlawfully and knowingly would and did transmit and cause to be transmitted by means of wire communication in interstate commerce, writings, signs, signals, pictures and sounds for the purpose of executing such scheme and artifice, in violation of Title 18, United States Code, section 1343, to wit: GHAZI MANNI, MITCHELL EDWARD KARAM, and RICARDO ALFREDO VALDES, Defendants herein, and other persons known and unknown to the Grand Jury, devised and effectuated a scheme to defraud and for obtaining money by "fixing" thoroughbred horse racing contests, that is, to use insider information provided by jockeys participating in thoroughbred horse racing contests in order to select horses for wagering purposes, and to then prearrange and attempt to predetermine the results of particular thoroughbred horse racing contests by bribing jockeys participating in these contests to

give less than their best effort to win and to handle their horses other than for the purpose of winning, and to then obtain money by using the simulcast pari-mutuel wagering system to place wagers on the results of these fixed horse racing contests.

C. OVERT ACTS.

In furtherance of the conspiracy, and to effect the illegal object thereof, the Defendants and their co-conspirators committed the following overt acts, among others, in the Eastern District of Michigan and elsewhere:

1. On or about Tuesday, December 27, 2005, at approximately 10:45 a.m., RICARDO ALFREDO VALDES, Defendant herein, had a telephone conversation with GHAZI MANNI, Defendant herein.

2. On or about Tuesday, December 27, 2005, at approximately 10:50 a.m., GHAZI MANNI, Defendant herein, had a telephone conversation with RICARDO ALFREDO VALDES, Defendant herein.

3. On or about Monday, January 9, 2006, at approximately 6:39 p.m., GHAZI MANNI, Defendant herein, had a telephone conversation with RICARDO ALFREDO VALDES, Defendant herein.

4. On or about Tuesday, January 10, 2006, at approximately 9:15 a.m., GHAZI MANNI, Defendant herein, had a telephone conversation with RICARDO ALFREDO VALDES, Defendant herein.

5. On or about Tuesday, January 10, 2006, at approximately 9:21 a.m., GHAZI MANNI, Defendant herein, had a telephone conversation with MITCHELL EDWARD KARAM, Defendant herein.

6. On or about Tuesday, January 10, 2006, at approximately 9:22 a.m., GHAZI MANNI, Defendant herein, had a telephone conversation with RICARDO ALFREDO VALDES, Defendant herein.

7. On or about Tuesday, January 10, 2006, at approximately 9:25 a.m., GHAZI MANNI, Defendant herein, had a telephone conversation with RICARDO ALFREDO VALDES, Defendant herein.

8. On or about Tuesday, January 10, 2006, at approximately 9:40 a.m., MITCHELL EDWARD KARAM, Defendant herein, had a telephone conversation with GHAZI MANNI, Defendant herein.

9. On or about Tuesday, January 10, 2006, at approximately 10:06 a.m., GHAZI MANNI, Defendant herein, retrieved a voice message from RICARDO ALFREDO VALDES, Defendant herein, left at approximately 9:09 a.m.

10. On or about Tuesday, January 10, 2006, at approximately 1:12 p.m., MITCHELL EDWARD KARAM, Defendant herein, had a telephone conversation with GHAZI MANNI, Defendant herein.

11. On or about Tuesday, January 10, 2006, at approximately 2:00 p.m., MITCHELL EDWARD KARAM, Defendant herein, had a telephone conversation with GHAZI MANNI, Defendant herein.

12. On or about Tuesday, January 10, 2006, at approximately 4:06 p.m., MITCHELL EDWARD KARAM, Defendant herein, had a telephone conversation with a pari-mutuel teller employed by Northville Downs located in Northville, Michigan.

13. On or about Tuesday, January 10, 2006, at approximately 4:16 p.m., MITCHELL

EDWARD KARAM, Defendant herein, had a telephone conversation with a pari-mutuel teller employed by Northville Downs located in Northville, Michigan.

14. On or about Tuesday, January 10, 2006, at approximately 4:31 p.m., MITCHELL EDWARD KARAM, Defendant herein, had a telephone conversation with a pari-mutuel teller employed by Northville Downs located in Northville, Michigan.

15. On or about Tuesday, January 10, 2006, at approximately 4:35 p.m., MITCHELL EDWARD KARAM, Defendant herein, had a telephone conversation with GHAZI MANNI, Defendant herein.

16. On or about Tuesday, January 10, 2006, at approximately 4:37 p.m., RICARDO ALFREDO VALDES, Defendant herein, rode a horse in the tenth race at Tampa Bay Downs located in Tampa, Florida.

17. On or about Tuesday, January 10, 2006, at approximately 4:41 p.m., MITCHELL EDWARD KARAM, Defendant herein, had a telephone conversation with GHAZI MANNI, Defendant herein.

18. On or about Tuesday, January 10, 2006, at approximately 4:45 p.m., MITCHELL EDWARD KARAM, Defendant herein, had a telephone conversation with a pari-mutuel teller employed by Northville Downs located in Northville, Michigan.

19. On or about Tuesday, January 10, 2006, at approximately 6:19 p.m., GHAZI MANNI, Defendant herein, made a telephone call and left a voice message for RICARDO ALFREDO VALDES, Defendant herein.

20. On or about Tuesday, January 10, 2006, at approximately 6:56 p.m., GHAZI MANNI, Defendant herein, made a telephone call and left a voice message for RICARDO

ALFREDO VALDES, Defendant herein.

21. On or about Tuesday, January 10, 2006, at approximately 7:40 p.m., RICARDO ALFREDO VALDES, Defendant herein, had a telephone conversation with GHAZI MANNI, Defendant herein.

22. On or about Wednesday, January 11, 2006, at approximately 10:44 a.m., MITCHELL EDWARD KARAM, Defendant herein, had a telephone conversation with GHAZI MANNI, Defendant herein.

23. On or about Wednesday, January 11, 2006, at approximately 10:45 a.m., GHAZI MANNI, Defendant herein, had a telephone conversation with MITCHELL EDWARD KARAM, Defendant herein.

24. On or about Wednesday, January 11, 2006, at approximately 11:16 a.m., MITCHELL EDWARD KARAM, Defendant herein, had a telephone conversation with GHAZI MANNI, Defendant herein.

25. On or about Wednesday, January 11, 2006, at approximately 11:31 a.m., MITCHELL EDWARD KARAM, Defendant herein, had a telephone conversation with GHAZI MANNI, Defendant herein.

26. On or about Wednesday, January 11, 2006, at approximately 11:33 a.m., RICARDO ALFREDO VALDES, Defendant herein, made a telephone call and left a voice message for GHAZI MANNI, Defendant herein.

27. On or about Wednesday, January 11, 2006, at approximately 11:34 a.m., GHAZI MANNI, Defendant herein, had a telephone conversation with MITCHELL EDWARD KARAM, Defendant herein.

28. On Wednesday, January 11, 2006, at approximately 12:02 p.m., GHAZI MANNI, Defendant herein, had a telephone conversation with RICARDO ALFREDO VALDES, Defendant herein.

29. On or about Wednesday, January 11, 2006, at approximately 12:42 p.m., MITCHELL EDWARD KARAM, Defendant herein, had a telephone conversation with GHAZI MANNI, Defendant herein.

30. On or about Thursday, January 12, 2006, at approximately 9:34 a.m., MITCHELL EDWARD KARAM, Defendant herein, had a telephone conversation with GHAZI MANNI, Defendant herein.

31. On or about Saturday, January 14, 2006, at approximately 9:11 a.m., RICARDO ALFREDO VALDES, Defendant herein, had a telephone conversation with GHAZI MANNI, Defendant herein.

32. On or about Saturday, January 14, 2006, at approximately 9:13 a.m., GHAZI MANNI, Defendant herein, had a telephone conversation with MITCHELL EDWARD KARAM, Defendant herein.

33. On or about Saturday, January 14, 2006, at approximately 9:16 a.m., GHAZI MANNI, Defendant herein, had a telephone conversation with RICARDO ALFREDO VALDES, Defendant herein.

34. On or about Saturday, January 14, 2006, at approximately 9:21 a.m., GHAZI MANNI, Defendant herein, had a telephone conversation with MITCHELL EDWARD KARAM, Defendant herein.

35. On or about Saturday, January 14, 2006, at approximately 9:28 a.m., MITCHELL

EDWARD KARAM, Defendant herein, had a telephone conversation with GHAZI MANNI, Defendant herein.

36. On or about Saturday, January 14, 2006, at approximately 9:32 a.m., GHAZI MANNI, Defendant herein, had a telephone conversation with RICARDO ALFREDO VALDES, Defendant herein.

37. On or about Saturday, January 14, 2006, at approximately 9:43 a.m., MITCHELL EDWARD KARAM, Defendant herein, had a telephone conversation with GHAZI MANNI, Defendant herein.

38. On or about Saturday, January 14, 2006, at approximately 10:18 a.m., MITCHELL EDWARD KARAM, Defendant herein, had a telephone conversation with GHAZI MANNI, Defendant herein.

39. On or about Saturday, January 14, 2006, at approximately 12:56 p.m., MITCHELL EDWARD KARAM, Defendant herein, had a telephone conversation with GHAZI MANNI, Defendant herein.

40. On or about Saturday, January 14, 2006, at approximately 1:26 p.m., MITCHELL EDWARD KARAM, Defendant herein, had a telephone conversation with GHAZI MANNI, Defendant herein.

41. On or about Monday, January 16, 2006, at approximately 7:43 p.m., GHAZI MANNI, Defendant herein, had a telephone conversation with RICARDO ALFREDO VALDES, Defendant herein.

42. On or about Thursday, January 19, 2006, at approximately 7:32 p.m., RICARDO ALFREDO VALDES, Defendant herein, had a telephone conversation with GHAZI MANNI,

Defendant herein.

43. On or about Monday, January 23, 2006, at approximately 9:59 a.m., RICARDO ALFREDO VALDES, Defendant herein, had a telephone conversation with GHAZI MANNI, Defendant herein.

44. On or about Friday, January 27, 2006, at approximately 10:27 a.m., GHAZI MANNI, Defendant herein, had a telephone conversation with MITCHELL EDWARD KARAM, Defendant herein.

45. On or about Saturday, January 28, 2006, at approximately 10:43 a.m., GHAZI MANNI, Defendant herein, had a telephone conversation with MITCHELL EDWARD KARAM, Defendant herein.

46. On or about Saturday, January 28, 2006, at approximately 8:17 p.m., GHAZI MANNI, Defendant herein, had a telephone conversation with RICARDO ALFREDO VALDES, Defendant herein.

47. On or about Saturday, January 28, 2006, at approximately 9:53 p.m., RICARDO ALFREDO VALDES, Defendant herein, had a telephone conversation with GHAZI MANNI, Defendant herein.

48. On or about Sunday, January 29, 2006, at approximately 9:30 a.m., RICARDO ALFREDO VALDES, Defendant herein, had a telephone conversation with GHAZI MANNI, Defendant herein.

49. On or about Sunday, January 29, 2006, at approximately 9:32 a.m., GHAZI MANNI, Defendant herein, had a telephone conversation with MITCHELL EDWARD KARAM, Defendant herein.

50. On or about Sunday, January 29, 2006, at approximately 9:41 a.m., GHAZI MANNI, Defendant herein, had a telephone conversation with MITCHELL EDWARD KARAM, Defendant herein.

51. On or about Sunday, January 29, 2006, at approximately 9:47 a.m., GHAZI MANNI, Defendant herein, had a telephone conversation with MITCHELL EDWARD KARAM, Defendant herein.

52. On or about Sunday, January 29, 2006, at approximately 9:56 a.m., GHAZI MANNI, Defendant herein, had a telephone conversation with RICARDO ALFREDO VALDES, Defendant herein.

53. On or about Sunday, January 29, 2006, at approximately 12:19 p.m., GHAZI MANNI, Defendant herein, had a telephone conversation with MITCHELL EDWARD KARAM, Defendant herein.

54. On or about Sunday, January 29, 2006, at approximately 12:24 p.m., MITCHELL EDWARD KARAM, Defendant herein, had a telephone conversation with GHAZI MANNI, Defendant herein.

55. On or about Sunday, January 29, 2006, at approximately 12:33 p.m., MITCHELL EDWARD KARAM, Defendant herein, had a telephone conversation with GHAZI MANNI, Defendant herein.

56. On or about Sunday, January 29, 2006, at approximately 12:43 p.m., GHAZI MANNI, Defendant herein, had a telephone conversation with MITCHELL EDWARD KARAM, Defendant herein.

57. On or about Sunday, January 29, 2006, at approximately 12:51 p.m., RICARDO

ALFREDO VALDES, Defendant herein, had a telephone conversation with GHAZI MANNI, Defendant herein.

58. On or about Sunday, January 29, 2006, at approximately 1:11 p.m., GHAZI MANNI, Defendant herein, had a telephone conversation with MITCHELL EDWARD KARAM, Defendant herein.

59. On or about Sunday, January 29, 2006, at approximately 1:22 p.m., MITCHELL EDWARD KARAM, Defendant herein, had a telephone conversation with GHAZI MANNI, Defendant herein.

60. On or about Sunday, January 29, 2006, at approximately 1:29 p.m., MITCHELL EDWARD KARAM, Defendant herein, had a telephone conversation with GHAZI MANNI, Defendant herein.

61. On or about Sunday, January 29, 2006, at approximately 1:32 p.m., RICARDO ALFREDO VALDES, Defendant herein, rode a horse in the third race at Tampa Bay Downs located in Tampa, Florida.

62. On or about Sunday, January 29, 2006, at approximately 1:38 p.m., GHAZI MANNI, Defendant herein, had a telephone conversation with MITCHELL EDWARD KARAM, Defendant herein.

63. On or about Sunday, January 29, 2006, at approximately 2:29 p.m., MITCHELL EDWARD KARAM, Defendant herein, had a telephone conversation with GHAZI MANNI, Defendant herein.

64. On or about Sunday, January 29, 2006, at approximately 6:05 p.m., RICARDO ALFREDO VALDES, Defendant herein, had a telephone conversation with GHAZI MANNI,

Defendant herein.

65. On or about Sunday, January 29, 2006, at approximately 6:22 p.m., MITCHELL EDWARD KARAM, Defendant herein, had a telephone conversation with GHAZI MANNI, Defendant herein.

66. On or about Sunday, January 29, 2006, at approximately 8:30 p.m., GHAZI MANNI, Defendant herein, had a telephone conversation with MITCHELL EDWARD KARAM, Defendant herein.

67. On or about Monday, January 30, 2006, at approximately 10:38 a.m., GHAZI MANNI, Defendant herein, had a telephone conversation with RICARDO ALFREDO VALDES, Defendant herein.

68. On or about Monday, January 30, 2006, at approximately 11:39 a.m., RICARDO ALFREDO VALDES, Defendant herein, had a telephone conversation with GHAZI MANNI, Defendant herein.

69. On or about Monday, January 30, 2006, at approximately 3:52 p.m., GHAZI MANNI, Defendant herein, had a telephone conversation with MITCHELL EDWARD KARAM, Defendant herein.

70. On or about Monday, January 30, 2006, at approximately 5:49 p.m., MITCHELL EDWARD KARAM, Defendant herein, had a telephone conversation with GHAZI MANNI, Defendant herein.

71. On or about Monday, January 30, 2006, at approximately 7:37 p.m., GHAZI MANNI, Defendant herein, had a telephone conversation with RICARDO ALFREDO VALDES, Defendant herein.

72. On or about Monday, January 30, 2006, at approximately 8:18 p.m., GHAZI MANNI, Defendant herein, had a telephone conversation with RICARDO ALFREDO VALDES, Defendant herein.

73. On or about Tuesday, January 31, 2006, at approximately 9:06 a.m., GHAZI MANNI, Defendant herein, had a telephone conversation with MITCHELL EDWARD KARAM, Defendant herein.

74. On or about Tuesday, January 31, 2006, at approximately 9:07 a.m., MITCHELL EDWARD KARAM, Defendant herein, had a telephone conversation with GHAZI MANNI, Defendant herein.

75. On or about Tuesday, January 31, 2006, at approximately 9:42 a.m., MITCHELL EDWARD KARAM, Defendant herein, had a telephone conversation with GHAZI MANNI, Defendant herein.

76. On or about Tuesday, January 31, 2006, at approximately 10:01 a.m., MITCHELL EDWARD KARAM, Defendant herein, had a telephone conversation with GHAZI MANNI, Defendant herein.

77. On or about Tuesday, January 31, 2006, at approximately 10:02 a.m., GHAZI MANNI, Defendant herein, had a telephone conversation with MITCHELL EDWARD KARAM, Defendant herein.

78. On or about Tuesday, January 31, 2006, at approximately 10:03 a.m., RICARDO ALFREDO VALDES, Defendant herein, had a telephone conversation with GHAZI MANNI, Defendant herein.

79. On or about Tuesday, January 31, 2006, at approximately 10:04 a.m., GHAZI

MANNI, Defendant herein, had a telephone conversation with RICARDO ALFREDO VALDES, Defendant herein.

80. On or about Tuesday, January 31, 2006, at approximately 10:35 a.m., MITCHELL EDWARD KARAM, Defendant herein, had a telephone conversation with GHAZI MANNI, Defendant herein.

81. On or about Tuesday, January 31, 2006, at approximately 11:01 a.m., GHAZI MANNI, Defendant herein, had a telephone conversation with an employee of Huntington Bank located in Hamtramck, Michigan.

82. On or about Tuesday, January 31, 2006, at approximately 11:04 a.m., GHAZI MANNI, Defendant herein, had a telephone conversation with an employee of Huntington Bank located in Hamtramck, Michigan.

83. On or about Tuesday, January 31, 2006, at approximately 11:08 a.m., GHAZI MANNI, Defendant herein, had a telephone conversation with RICARDO ALFREDO VALDES, Defendant herein.

84. On or about Tuesday, January 31, 2006, at approximately 11:09 a.m., GHAZI MANNI, Defendant herein, had a telephone conversation with RICARDO ALFREDO VALDES, Defendant herein.

85. On or about Tuesday, January 31, 2006, at approximately 11:14 a.m., MITCHELL EDWARD KARAM, Defendant herein, had a telephone conversation with GHAZI MANNI, Defendant herein.

86. On or about Tuesday, January 31, 2006, at approximately 11:18 a.m., GHAZI MANNI, Defendant herein, had a telephone conversation with RICARDO ALFREDO VALDES,

Defendant herein.

87. On or about Tuesday, January 31, 2006, at approximately 11:19 a.m., GHAZI MANNI, Defendant herein, had a telephone conversation with an employee of Huntington Bank located in Hamtramck, Michigan.

88. On or about Tuesday, January 31, 2006, at approximately 11:33 a.m., MITCHELL EDWARD KARAM, Defendant herein, had a telephone conversation with GHAZI MANNI, Defendant herein.

89. On or about Tuesday, January 31, 2006, at approximately 11:35 a.m., GHAZI MANNI, Defendant herein, had a telephone conversation with MITCHELL EDWARD KARAM, Defendant herein.

90. On or about Tuesday, January 31, 2006, at approximately 11:35 a.m., GHAZI MANNI, Defendant herein, met MITCHELL EDWARD KARAM, Defendant herein, at the F.G. Coney Island located at 2404 Dequindre, Hazel Park, Michigan.

91. On or about Tuesday, January 31, 2006, at approximately 11:56 a.m., RICARDO ALFREDO VALDES, Defendant herein, had a telephone conversation with GHAZI MANNI, Defendant herein.

92. On or about Tuesday, January 31, 2006, at approximately 11:58 a.m., GHAZI MANNI, Defendant herein, had a telephone conversation with an employee of Huntington Bank located in Hamtramck, Michigan.

93. On or about Tuesday, January 31, 2006, at approximately 12:39 p.m., GHAZI MANNI, Defendant herein, had a telephone conversation with RICARDO ALFREDO VALDES, Defendant herein.

94. On or about Tuesday, January 31, 2006, at approximately 12:40 p.m., GHAZI MANNI, Defendant herein, had a telephone conversation with an employee of Huntington Bank located in Hamtramck, Michigan.

95. On or about Tuesday, January 31, 2006, at approximately 12:59 p.m., GHAZI MANNI, Defendant herein, had a telephone conversation with an employee of Huntington Bank located in Hamtramck, Michigan.

96. On or about Tuesday, January 31, 2006, at approximately 1:00 p.m., GHAZI MANNI, Defendant herein, had a telephone conversation with RICARDO ALFREDO VALDES, Defendant herein.

97. On or about Tuesday, January 31, 2006, at approximately 1:38 p.m., RICARDO ALFREDO VALDES, Defendant herein, had a telephone conversation with GHAZI MANNI, Defendant herein.

98. On or about Tuesday, January 31, 2006, at approximately 3:44 p.m., RICARDO ALFREDO VALDES, Defendant herein, rode a horse in the eighth race at Tampa Bay Downs located in Tampa, Florida.

99. On or about Tuesday, January 31, 2006, at approximately 6:12 p.m., RICARDO ALFREDO VALDES, Defendant herein, made a telephone call and left a voice message for GHAZI MANNI, Defendant herein.

100. On or about Tuesday, January 31, 2006, at approximately 6:21 p.m., GHAZI MANNI, Defendant herein, had a telephone conversation with RICARDO ALFREDO VALDES, Defendant herein.

101. On or about Tuesday, January 31, 2006, at approximately 7:26 p.m., MITCHELL

EDWARD KARAM, Defendant herein, had a telephone conversation with GHAZI MANNI, Defendant herein.

102. On or about Tuesday, January 31, 2006, at approximately 7:33 p.m., GHAZI MANNI, Defendant herein, had a telephone conversation with MITCHELL EDWARD KARAM, Defendant herein.

103. On or about Tuesday, January 31, 2006, at approximately 7:50 p.m., GHAZI MANNI, Defendant herein, had a telephone conversation with MITCHELL EDWARD KARAM, Defendant herein.

104. On or about Sunday, February 12, 2006, at approximately 10:38 a.m., RICARDO ALFREDO VALDES, Defendant herein, had a telephone conversation with GHAZI MANNI, Defendant herein.

105. On or about Sunday, February 12, 2006, at approximately 10:42 a.m., GHAZI MANNI, Defendant herein, had a telephone conversation with MITCHELL EDWARD KARAM, Defendant herein.

106. On or about Sunday, February 12, 2006, at approximately 10:45 a.m., GHAZI MANNI, Defendant herein, had a telephone conversation with RICARDO ALFREDO VALDES, Defendant herein.

107. On or about Sunday, February 12, 2006, at approximately 4:32 p.m., MITCHELL EDWARD KARAM, Defendant herein, had a telephone conversation with GHAZI MANNI, Defendant herein.

108. On or about Sunday, February 12, 2006, at approximately 5:41 p.m., GHAZI MANNI, Defendant herein, had a telephone conversation with MITCHELL EDWARD KARAM,

Defendant herein.

109. On or about Sunday, February 12, 2006, at approximately 7:16 p.m., GHAZI MANNI, Defendant herein, had a telephone conversation with MITCHELL EDWARD KARAM, Defendant herein.

110. On or about Monday, February 13, 2006, at approximately 10:30 a.m., GHAZI MANNI, Defendant herein, had a telephone conversation with MITCHELL EDWARD KARAM, Defendant herein.

111. On or about Monday, February 13, 2006, at approximately 8:25 p.m., GHAZI MANNI, Defendant herein, had a telephone conversation with RICARDO ALFREDO VALDES, Defendant herein.

112. On or about Tuesday, February 14, 2006, at approximately 11:18 a.m., GHAZI MANNI, Defendant herein, had a telephone conversation with RICARDO ALFREDO VALDES, Defendant herein.

113. On or about Tuesday, February 14, 2006, at approximately 11:45 a.m., GHAZI MANNI, Defendant herein, had a telephone conversation with RICARDO ALFREDO VALDES, Defendant herein.

114. On or about Tuesday, February 14, 2006, at approximately 6:46 p.m., GHAZI MANNI, Defendant herein, had a telephone conversation with RICARDO ALFREDO VALDES, Defendant herein.

115. On or about Thursday, February 16, 2006, at approximately 11:45 a.m., GHAZI MANNI, Defendant herein, had a telephone conversation with RICARDO ALFREDO VALDES, Defendant herein.

116. On or about Friday, February 17, 2006, at approximately 10:54 a.m., GHAZI MANNI, Defendant herein, had a telephone conversation with RICARDO ALFREDO VALDES, Defendant herein.

117. On or about Saturday, March 25, 2006, at approximately 10:29 a.m., RICARDO ALFREDO VALDES, Defendant herein, made a telephone call and left a voice message for GHAZI MANNI, Defendant herein.

118. On or about Sunday, March 26, 2006, at approximately 11:02 a.m., RICARDO ALFREDO VALDES, Defendant herein, had a telephone conversation with GHAZI MANNI, Defendant herein.

119. On or about Tuesday, April 11, 2006, at approximately 8:37 p.m., RICARDO ALFREDO VALDES, Defendant herein, had a telephone conversation with GHAZI MANNI, Defendant herein.

120. On or about Friday, April 14, 2006, at approximately 8:50 p.m., GHAZI MANNI, Defendant herein, had a telephone conversation with RICARDO ALFREDO VALDES, Defendant herein.

121. On or about Saturday, April 15, 2006, at approximately 10:49 a.m., GHAZI MANNI, Defendant herein, had a telephone conversation with RICARDO ALFREDO VALDES, Defendant herein.

122. On or about Saturday, April 15, 2006, at approximately 12:32 p.m., GHAZI MANNI, Defendant herein, had a telephone conversation with RICARDO ALFREDO VALDES, Defendant herein.

123. On or about Saturday, April 15, 2006, at approximately 1:36 p.m., RICARDO

ALFREDO VALDES, Defendant herein, rode a horse in the third race at Tampa Bay Downs located in Tampa, Florida.

124. On or about Saturday, April 15, 2006, at approximately 5:32 p.m., GHAZI MANNI, Defendant herein, had a telephone conversation with RICARDO ALFREDO VALDES, Defendant herein.

125. On or about Saturday, April 15, 2006, at approximately 9:12 p.m., GHAZI MANNI, Defendant herein, had a telephone conversation with MITCHELL EDWARD KARAM, Defendant herein.

126. On or about Sunday, April 16, 2006, at approximately 11:44 a.m., GHAZI MANNI, Defendant herein, had a telephone conversation with MITCHELL EDWARD KARAM, Defendant herein.

127. On or about Monday, April 17, 2006, at approximately 9:58 a.m., RICARDO ALFREDO VALDES, Defendant herein, made a telephone call and left a voice message for GHAZI MANNI, Defendant herein.

128. On or about Monday, April 17, 2006, at approximately 12:42 p.m., RICARDO ALFREDO VALDES, Defendant herein, had a telephone conversation with GHAZI MANNI, Defendant herein.

129. On or about Thursday, August 17, 2006, at approximately 5:44 p.m., RICARDO ALFREDO VALDES, Defendant herein, had a telephone conversation with GHAZI MANNI, Defendant herein.

130. On or about Saturday, August 19, 2006, at approximately 10:26 a.m., GHAZI MANNI, Defendant herein, had a telephone conversation with MITCHELL EDWARD KARAM,

Defendant herein.

131. On or about Saturday, August 19, 2006, at approximately 10:39 a.m., GHAZI MANNI, Defendant herein, had a telephone conversation with MITCHELL EDWARD KARAM, Defendant herein.

132. On or about Saturday, August 19, 2006, at approximately 12:28 p.m., GHAZI MANNI, Defendant herein, had a telephone conversation with MITCHELL EDWARD KARAM, Defendant herein.

133. On or about Saturday, August 19, 2006, at approximately 12:29 p.m., GHAZI MANNI, Defendant herein, had a telephone conversation with RICARDO ALFREDO VALDES, Defendant herein.

134. On or about Saturday, August 19, 2006, at approximately 12:32 p.m., GHAZI MANNI, Defendant herein, had a telephone conversation with MITCHELL EDWARD KARAM, Defendant herein.

135. On or about Saturday, August 19, 2006, at approximately 2:21 p.m., MITCHELL EDWARD KARAM, Defendant herein, had a telephone conversation with GHAZI MANNI, Defendant herein.

136. On or about Saturday, August 19, 2006, at approximately 2:30 p.m., GHAZI MANNI, Defendant herein, had a telephone conversation with MITCHELL EDWARD KARAM, Defendant herein.

137. On or about Tuesday, August 21, 2006, at approximately 11:48 a.m., RICARDO ALFREDO VALDES, Defendant herein, had a telephone conversation with GHAZI MANNI, Defendant herein.

138. On or about Tuesday, August 21, 2006, at approximately 1:42 p.m., MITCHELL EDWARD KARAM, Defendant herein, had a telephone conversation with GHAZI MANNI, Defendant herein.

139. On or about Tuesday, August 21, 2006, at approximately 2:21 p.m., MITCHELL EDWARD KARAM, Defendant herein, had a telephone conversation with GHAZI MANNI, Defendant herein.

140. On or about Tuesday, August 21, 2006, at approximately 2:56 p.m., MITCHELL EDWARD KARAM, Defendant herein, had a telephone conversation with GHAZI MANNI, Defendant herein.

141. On or about Tuesday, August 21, 2006, at approximately 4:39 p.m., MITCHELL EDWARD KARAM, Defendant herein, had a telephone conversation with GHAZI MANNI, Defendant herein.

142. On or about Tuesday, August 21, 2006, at approximately 4:56 p.m., MITCHELL EDWARD KARAM, Defendant herein, had a telephone conversation with GHAZI MANNI, Defendant herein.

143. On or about Tuesday, August 22, 2006, at approximately 11:07 a.m., GHAZI MANNI, Defendant herein, had a telephone conversation with RICARDO ALFREDO VALDES, Defendant herein.

144. On or about Tuesday, August 22, 2006, at approximately 1:24 p.m., GHAZI MANNI, Defendant herein, had a telephone conversation with RICARDO ALFREDO VALDES, Defendant herein.

145. On or about Thursday, August 24, 2006, at approximately 5:36 p.m., GHAZI

MANNI, Defendant herein, had a telephone conversation with RICARDO ALFREDO VALDES, Defendant herein.

146. On or about Saturday, August 26, 2006, at approximately 10:24 a.m., GHAZI MANNI, Defendant herein, had a telephone conversation with RICARDO ALFREDO VALDES, Defendant herein.

147. On or about Saturday, August 26, 2006, at approximately 11:32 a.m., MITCHELL EDWARD KARAM, Defendant herein, had a telephone conversation with GHAZI MANNI, Defendant herein.

148. On or about Saturday, August 26, 2006, at approximately 12:48 p.m., GHAZI MANNI, Defendant herein, had a telephone conversation with RICARDO ALFREDO VALDES, Defendant herein.

149. On or about Saturday, August 26, 2006, at approximately 1:03 p.m., MITCHELL EDWARD KARAM, Defendant herein, had a telephone conversation with GHAZI MANNI, Defendant herein.

150. On or about Saturday, August 26, 2006, at approximately 2:48 p.m., GHAZI MANNI, Defendant herein, had a telephone conversation with MITCHELL EDWARD KARAM, Defendant herein.

151. On or about Saturday, August 26, 2006, at approximately 5:41 p.m., GHAZI MANNI, Defendant herein, had a telephone conversation with RICARDO ALFREDO VALDES, Defendant herein.

152. On or about Saturday, August 26, 2006, at approximately 7:25 p.m., GHAZI MANNI, Defendant herein, had a telephone conversation with RICARDO ALFREDO VALDES,

Defendant herein.

153. On or about Monday, August 28, 2006, at approximately 9:34 a.m., GHAZI MANNI, Defendant herein, had a telephone conversation with MITCHELL EDWARD KARAM, Defendant herein.

154. On or about Monday, August 28, 2006, at approximately 12:14 p.m., GHAZI MANNI, Defendant herein, had a telephone conversation with RICARDO ALFREDO VALDES, Defendant herein.

155. On or about Monday, August 28, 2006, at approximately 12:17 p.m., GHAZI MANNI, Defendant herein, had a telephone conversation with MITCHELL EDWARD KARAM, Defendant herein.

156. On or about Monday, August 28, 2006, at approximately 12:24 p.m., MITCHELL EDWARD KARAM, Defendant herein, had a telephone conversation with GHAZI MANNI, Defendant herein.

157. On or about Monday, August 28, 2006, at approximately 3:33 p.m., GHAZI MANNI, Defendant herein, had a telephone conversation with MITCHELL EDWARD KARAM, Defendant herein.

158. On or about Monday, August 28, 2006, at approximately 4:33 p.m., MITCHELL EDWARD KARAM, Defendant herein, had a telephone conversation with GHAZI MANNI, Defendant herein.

159. On or about Monday, August 28, 2006, at approximately 4:32 p.m., GHAZI MANNI, Defendant herein, had a telephone conversation with MITCHELL EDWARD KARAM, Defendant herein.

160. On or about Sunday, September 3, 2006, at approximately 12:22 p.m., GHAZI MANNI, Defendant herein, had a telephone conversation with RICARDO ALFREDO VALDES, Defendant herein.

161. On or about Tuesday, September 5, 2006, at approximately 3:22 p.m., GHAZI MANNI, Defendant herein, had a telephone conversation with MITCHELL EDWARD KARAM, Defendant herein.

162. On or about Tuesday, September 5, 2006, at approximately 4:32 p.m., MITCHELL EDWARD KARAM, Defendant herein, had a telephone conversation with GHAZI MANNI, Defendant herein.

163. On or about Tuesday, September 5, 2006, at approximately 8:24 p.m., GHAZI MANNI, Defendant herein, had a telephone conversation with MITCHELL EDWARD KARAM, Defendant herein.

164. On or about Saturday, September 9, 2006, at approximately 11:45 a.m., GHAZI MANNI, Defendant herein, had a telephone conversation with RICARDO ALFREDO VALDES, Defendant herein.

165. On or about Sunday, September 10, 2006, at approximately 12:56 p.m., GHAZI MANNI, Defendant herein, had a telephone conversation with RICARDO ALFREDO VALDES, Defendant herein.

166. On or about Wednesday, September 13, 2006, at approximately 4:19 p.m., GHAZI MANNI, Defendant herein, had a telephone conversation with RICARDO ALFREDO VALDES, Defendant herein.

167. On or about Tuesday, December 5, 2006, at approximately 7:41 p.m., GHAZI

MANNI, Defendant herein, had a telephone conversation with RICARDO ALFREDO VALDES, Defendant herein.

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

COUNT TWO.

(18 U.S.C. § 224(a) - Conspiracy to Influence Sporting Contests by Bribery)

D-1 GHAZI MANNI
D-2 MITCHELL EDWARD KARAM
D-3 RICARDO ALFREDO VALDES

A. GENERAL ALLEGATIONS.

The general allegations contained in paragraphs one through ten of Part A of Count One are re-alleged and incorporated by reference herein as if fully rewritten.

B. THE CONSPIRACY.

1. From at least in or about December 2005, and continuing through at least in or about December 2006, in the Eastern District of Michigan and elsewhere, GHAZI MANNI, MITCHELL EDWARD KARAM, and RICARDO ALFREDO VALDES, Defendants herein, did unlawfully, willfully, and knowingly combine, conspire, confederate, and agree together and with each other, and with other persons known and unknown to the Grand Jury, to carry into effect a scheme in commerce to influence by bribery sporting contests; to wit: selected thoroughbred horse races held in Florida, Delaware, and Michigan, with knowledge that the purpose of such scheme was to influence by bribery those contests.

C. MANNER, MEANS AND METHODS OF THE CONSPIRACY.

1. That the manner, means and methods employed by the defendants, GHAZI MANNI, MITCHELL EDWARD KARAM, and RICARDO ALFREDO VALDES, and other persons

known and unknown to the Grand Jury, to effect the objects of the conspiracy were as follows:

2. It was part of the conspiracy that GHAZI MANNI and MITCHELL EDWARD KARAM, Defendants herein, would and did, directly and indirectly, give, offer, and promise money to RICARDO ALFREDO VALDES, Defendant herein, and other persons known and unknown to the Grand Jury, with intent to induce them to use less than their best efforts to win a race and to undertake a course of conduct for other than the purpose of winning a race in order to influence the order of finish of various thoroughbred horse races held in Florida, Delaware, and Michigan.

3. It was a part of the conspiracy that RICARDO ALFREDO VALDES, Defendant herein, and other persons known and unknown to the Grand Jury, would and did receive and accept, and agree to receive and accept, money and other things of value in return for being induced to use less than their best efforts to win a race and to undertake a course of conduct for other than the purpose of winning a race in order to influence the order of finish of various thoroughbred horse races held in Florida.

4. It was further part of the conspiracy that GHAZI MANNI and MITCHELL EDWARD KARAM, Defendants herein, would and did place wagers on certain thoroughbred horse racing contests, knowing that these contests were "fixed," to generate money for the conspirators in the scheme.

5 It was further a part of the conspiracy that RICARDO ALFREDO VALDES, Defendant herein, would and did also facilitate the "fixing" of thoroughbred horse racing contests by attempting to recruit other thoroughbred horse jockeys to join the conspiracy.

6. It was further a part of the conspiracy that GHAZI MANNI and RICARDO ALFREDO

VALDES, Defendants herein, would and did use interstate telephone facilities between Michigan and Florida and elsewhere, to carry into effect the scheme to obtain money by influencing the order of finish of various thoroughbred horse races.

7. It was further a part of the conspiracy that GHAZI MANNI and MITCHELL EDWARD KARAM, Defendants herein, would and did use the interstate simulcast pari-mutuel wagering system to carry into effect the scheme to obtain money by influencing the order of finish of various thoroughbred horse races.

D. OVERT ACTS.

In furtherance of the conspiracy, and to effect the object thereof, the Defendants and their co-conspirators committed and caused to be committed the overt acts contained in paragraphs one through one hundred sixty-seven of Part D of Count One, which are re-alleged and incorporated by reference herein as if fully rewritten, and which were committed in the Eastern District of Michigan and elsewhere.

All in violation of Title 18, United States Code, Sections 224(a).

COUNTS THREE THROUGH NINETEEN.

(18 U.S.C. § 1952 - Unlawful Use of a Facility in Interstate Commerce)

D-1 GHAZI MANNI
D-3 RICARDO ALFREDO VALDES

On the dates listed below, in the Eastern District of Michigan and elsewhere, the Defendants listed below, and others known and unknown to the Grand Jury, did knowingly use and cause to be used a facility in interstate commerce with intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment and carrying on of unlawful

activity, as that term is defined in Title 18, United States Code, Section 1952(b), to wit: bribery in violation of Title 18, United States Code, section 224; Michigan Compiled Laws Sections 750.157a(a) and 431.332; Florida Statutes section 838.12; and Delaware Code, Title 28, Section 705, and thereafter did perform and attempt to perform acts to promote, manage, establish, and carry on, and to facilitate the promotion, management, establishment, and carrying on of said unlawful activity:

COUNT	DEFENDANTS	DATE AND APPROXIMATE TIME OF USE OF INTERSTATE FACILITY TO AND FROM THE EASTERN DISTRICT OF MICHIGAN
THREE	GHAZI MANNI RICARDO ALFREDO VALDES	JANUARY 10, 2006 9:15 A.M.
FOUR	GHAZI MANNI RICARDO ALFREDO VALDES	JANUARY 10, 2006 9:22 A.M.
FIVE	GHAZI MANNI RICARDO ALFREDO VALDES	JANUARY 10, 2006 7:40 P.M.
SIX	GHAZI MANNI RICARDO ALFREDO VALDES	JANUARY 28, 2006 8:17 P.M.
SEVEN	GHAZI MANNI RICARDO ALFREDO VALDES	JANUARY 28, 2006 9:53 P.M.
EIGHT	GHAZI MANNI RICARDO ALFREDO VALDES	JANUARY 29, 2006 9:30 A.M.
NINE	GHAZI MANNI RICARDO ALFREDO VALDES	JANUARY 29, 2006 9:56 A.M.
TEN	GHAZI MANNI RICARDO ALFREDO VALDES	JANUARY 30, 2006 10:38 A.M.
ELEVEN	GHAZI MANNI RICARDO ALFREDO VALDES	JANUARY 30, 2006 7:37 P.M.

TWELVE	GHAZI MANNI RICARDO ALFREDO VALDES	JANUARY 30, 2006 8:18 P.M.
THIRTEEN	GHAZI MANNI RICARDO ALFREDO VALDES	JANUARY 31, 2006 10:04 A.M.
FOURTEEN	GHAZI MANNI RICARDO ALFREDO VALDES	JANUARY 31, 2006 11:56 A.M.
FIFTEEN	GHAZI MANNI RICARDO ALFREDO VALDES	JANUARY 31, 2006 1:38 P.M.
SIXTEEN	GHAZI MANNI RICARDO ALFREDO VALDES	APRIL 14, 2006 8:50 P.M.
SEVENTEEN	GHAZI MANNI RICARDO ALFREDO VALDES	APRIL 15, 2006 10:49 A.M.
EIGHTEEN	GHAZI MANNI RICARDO ALFREDO VALDES	APRIL 15, 2006 12:32 P.M.
NINETEEN	GHAZI MANNI RICARDO ALFREDO VALDES	APRIL 15, 2006 5:32 P.M.

All in violation of Title 18, United States Code, Section 1952(a)(3).

THIS IS A TRUE BILL.

s/Grand Jury Foreperson
GRAND JURY FOREPERSON

TERRENCE BERG
United States Attorney

s/Lynn A. Helland
LYNN A. HELLAND
Assistant Chief, Criminal Division

s/David E. Morris
DAVID E. MORRIS
Assistant U.S. Attorney

s/Saima S. Mohsin
SAIMA S. MOHSIN
Assistant U.S. Attorney
U.S. Department of Justice
211 West Fort Street, Suite 2001
Detroit, Michigan 48226-3211
Telephone: 313-226-9646

DATED: May 6, 2009.

...ted States District Court ...Eastern District of Michigan	**Criminal Case Cover Sheet**	**Case Number**

NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it accurately in all respects.

Companion Case Information	**Companion Case Number:** 1. U.S. v. Samuel Aviles Villegas 08-20353 - Hon. Julian Abele Cook 2. U.S. v. Ghazi Manni, et al (Separate action from the instant case, filed May 6, 2009, case number and Judge unknown)
This may be a companion case based upon **LCrR 57.10 (b)(4)**[1]:	
■ **Yes** ☐ **No**	**AUSA's Initials:** dem

Case Title: USA v. GHAZI MANNI, et al

County where offense occurred : Wayne

Case:2:09-cr-20193
Judge: Roberts, Victoria A
MJ: Whalen, R. Steven
Filed: 05-06-2009 At 12:30 PM
IND USA VS MANNI ET AL (LH)

Check One: ■ **Felony** ☐ **Misdemeanor** ☐ **Petty**

✓ **Indictment --- no prior complaint.**
____ Indictment/____Information --- based upon prior complaint [**Case number:**]
____ Information — based upon LCrR 57.10 (d) *[Complete Superseding section below].*

Superseding Case Information:

Superseding to Case No: _____ **Judge:** _____

☐ Original case was terminated; no additional charges or defendants.
☐ Corrects errors; no additional charges or defendants.
☐ Involves, for plea purposes, different charges or adds counts.
☐ Embraces same subject matter but adds the additional defendants or charges below:

Defendant name	**Charges**	**Prior Complaint (if applicable)**

Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.

May 6, 2009
Date

DAVID E. MORRIS (P61451)
Assistant United States Attorney
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[1] Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.