

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	CRIMINAL NO. 09-729-05
v.	:	DATE FILED: _____
MOHAMAD MAJED	:	VIOLATIONS:
	:	18 U.S.C. § 371
	:	(conspiracy to violate the Digital Millennium Copyright Act – 1 count)

SUPERSEDING INFORMATION

COUNT ONE

THE UNITED STATES ATTORNEY CHARGES THAT:

1. From on or about November 1, 2008, through on or about November 22, 2009, at Philadelphia, in the Eastern District of Pennsylvania, defendant

MOHAMAD MAJED

conspired and agreed with others known and unknown to the grand jury to commit an offense against the United States, that is, to willfully, and for purposes of commercial advantage and private financial gain, circumvent a technological measure that effectively controls access to a work protected under Title 17 of the United States Code, namely, a copyrighted work, in violation of Title 17, United States Code, Sections 1201(a)(1)(A) and 1204(a).

MANNER AND MEANS

It was part of the conspiracy that:

2. Defendant MOHAMAD MAJED and others known and unknown to the United States Attorney, participated in the purchase of hundreds of cellular telephones, specifically, Tracfone and Boost Mobile cellular telephones, from a law enforcement officer (the “UC”) acting in an undercover capacity. The UC represented to the defendants that the goods and merchandise were stolen.

3. Defendant MOHAMAD MAJED and others known and unknown to the United States Attorney, cut the cellular telephones out of their plastic casings and packaged them for sale and use overseas where the copyrighted software would be circumvented in order that the cellular telephones be capable of operating.

OVERT ACTS

In furtherance of this conspiracy, defendant MOHAMAD MAJED and others known and unknown to the Grand Jury, committed the following overt acts in the Eastern District of Pennsylvania and elsewhere:

1. On or about November 1, 2008, defendant MOHAMAD MAJED and Sadek Mohamad Koumaiha, a/k/a "Sammy," and Hassan Mahmoud Koumaiha, both charged elsewhere, met the UC in Philadelphia and took possession of approximately 4,105 purportedly stolen cellular telephones, removed 1,680 from their packaging, and repackaged them for overseas shipping by the UC.

2. On or about November 1, 2008, Sadek Mohamad Koumaiha, a/k/a "Sammy," directed the UC in Philadelphia to ship 1,680 of the repackaged cellular telephones to a specified address in Hong Kong.

3. On or about November 1, 2008, defendant MOHAMAD MAJED and Sadek Mohamad Koumaiha, a/k/a "Sammy," and Hassan Mahmoud Koumaiha took possession of approximately 2,425 purportedly stolen cellular telephones and transported them to Michigan.

4. On or about November 22, 2009, defendant MOHAMAD MAJED and Sadek Mohamad Koumaiha, a/k/a "Sammy," Hassan Mahmoud Koumaiha, Ali-Ibrahim El Sayed

Abdallah, charged elsewhere, traveled to Philadelphia to meet the UC and take possession of approximately 6,500 purportedly stolen cellular telephones

All in violation of Title 18, United States Code, Section 371.

ZANE DAVID MEMEGER
United States Attorney