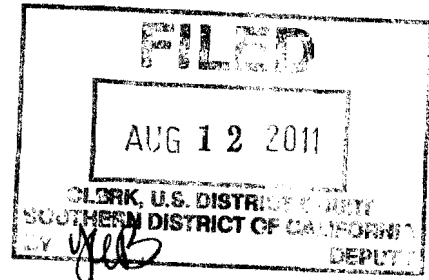


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UNITED STATES DISTRICT COURT
 SOUTHERN DISTRICT OF CALIFORNIA

July 2010 Grand Jury

9	UNITED STATES OF AMERICA,)	Case No. 11 CR 3590 BEN
10	Plaintiff,)	<u>I N D I C T M E N T</u>
11	v.)	Title 21, U.S.C., Sec. 848(a) -
12	NOFEL NOEL SULEYMAN (1),)	Continuing Criminal Enterprise;
13	aka "Jorgee,")	Title 21, U.S.C., Secs. 841(a)(1)
14	KARAR ALEKABI (2),)	and 846 - Conspiracy to Distribute
15	aka "K,")	Methamphetamine, Cocaine,
16	ALAN WALID JALU (3),)	Hydrocodone Bitartrate, Codeine,
17	CHRISTOPHER BALL (4),)	and MDMA; Title 21, U.S.C.,
18	aka "C-Bone,")	Sec. 841(a)(1) - Distribution of
19	GORDON RALPH WAITS (5),)	Methamphetamine, Cocaine,
	Defendants.)	Hydrocodone Bitartrate, Codeine,
)	and MDMA; Title 26, U.S.C.
)	Secs. 5841, 5861(d), and 5871 -
)	Possession of Unregistered
)	Firearm/Destructive Device;
)	Title 18, U.S.C., Sec. 2 - Aiding
)	and Abetting; Title 21, U.S.C.,
)	Sec. 853 - Criminal Forfeiture

The grand jury charges:

Count 1

Beginning at a date unknown to the grand jury and continuing up to and including August 12, 2011, within the Southern District of California, and elsewhere, defendant NOFEL NOEL SULEYMAN, aka "Jorgee," did knowingly and intentionally engage in a continuing criminal enterprise by violating various felony provisions of the Controlled Substances Act (Title 21, United States Code, Sections 801, et seq.), including but not limited to Title 21, United States Code,

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1 Sections 846 and 841(a)(1), as alleged in Counts 2 through 9, which
2 violations were part of a continuing series of violations of said Act
3 and were undertaken by defendant NOFEL NOEL SULEYMAN, aka "Jorgee,"
4 in concert with five or more other person with respect to whom
5 defendant NOFEL NOEL SULEYMAN, aka "Jorgee," occupied a position of
6 organizer, supervisor and other position of management, and from which
7 such continuing series of violations defendant NOFEL NOEL SULEYMAN,
8 aka "Jorgee," obtained substantial income and resources; in violation
9 of Title 21, United States Code, Section 848(a).

10 Count 2

11 Beginning at a date unknown, up to and including June 1, 2011,
12 within the Southern District of California, defendants NOFEL NOEL
13 SULEYMAN, aka "Jorgee," KARAR ALEKABI, aka "K," ALEN WALID JALU,
14 CHRISTOPHER BALL, and GORDON RALPH WAITS, did knowingly and
15 intentionally conspire together and with other persons known and
16 unknown to distribute 5 grams and more: to wit: 27.9 grams of
17 methamphetamine (actual), Cocaine, and Codeine, all Schedule II
18 Controlled Substances, and pills containing hydrocodone bitartrate and
19 MDMA, Schedule III Controlled Substances; in violation of Title 21,
20 United States Code, Sections 841(a)(1) and 846.

21 Count 3

22 On or about April 21, 2011, within the Southern District of
23 California, defendants NOFEL NOEL SULEYMAN, aka "Jorgee," and
24 CHRISTOPHER BALL, aka "C-Bone," did knowingly and intentionally
25 distribute 5 grams and more: to wit: 27.9 grams of methamphetamine
26 (actual), a Schedule II Controlled Substance; in violation of
27 Title 21, United States Code, Section 841(a)(1), and Title 18, United
28 States Code, Section 2.

Count 4

On or about April 21, 2010, within the Southern District of California, defendants NOFEL NOEL SULEYMAN, aka "Jorgee," and GORDON RALPH WAITS, did knowingly and intentionally distribute cocaine, a Schedule II Controlled Substance; in violation of Title 21, United States Code, Section 841(a)(1), and Title 18, United States Code, Section 2.

Count 5

On or about June 1, 2011, within the Southern District of California, defendant GORDON RALPH WAITS, did knowingly and intentionally distribute cocaine, a Schedule II Controlled Substance; in violation of Title 21, United States Code, Section 841(a)(1), and Title 18, United States Code, Section 2.

Count 6

On or about March 31, 2011, within the Southern District of California, defendants NOFEL NOEL SULEYMAN, aka "Jorgee," and ALEN WALID JALU, did knowingly and intentionally distribute codeine, a Schedule II Controlled Substance; in violation of Title 21, United States Code, Section 841(a)(1), and Title 18, United States Code, Section 2.

Count 7

On or about March 30, 2011, within the Southern District of California, defendants NOFEL NOEL SULEYMAN, aka "Jorgee," and ALEN WALID JALU, did knowingly and intentionally distribute pills containing hydrocodone bitartrate, a Schedule III Controlled Substance; in violation of Title 21, United States Code, Section 841(a)(1), and Title 18, United States Code, Section 2.

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Count 8

On or about April 6, 2011, within the Southern District of California, defendants NOFEL NOEL SULEYMAN, aka "Jorgee," and KARAR ALEKABI, aka "K," did knowingly and intentionally distribute pills containing MDMA, a Schedule III Controlled Substance; in violation of Title 21, United States Code, Section 841(a)(1), and Title 18, United States Code, Section 2.

Count 9

On or about April 12, 2011, within the Southern District of California, defendants NOFEL NOEL SULEYMAN, aka "Jorgee," and KARAR ALEKABI, aka "K," did knowingly and intentionally distribute pills containing MDMA, a Schedule III Controlled Substance; in violation of Title 21, United States Code, Section 841(a)(1), and Title 18, United States Code, Section 2.

Count 10

On or about May 23, 2011, within the Southern District of California, defendant NOFEL NOEL SULEYMAN, aka "Jorgee," did knowingly possess a firearm, to wit: a destructive device consisting of a pipe bomb containing gun powder, marbles, and nails and designed for use as a weapon, not registered to him in the National Firearms Registration and Transfer Record; in violation of Title 26, United States Code, Sections 5841, 5861(d), and 5871, and Title 18, United States Code, Section 2.

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CRIMINAL FORFEITURE ALLEGATIONS

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2 1. The allegations contained in Counts 1 through 9 are
3 realleged and by their reference fully incorporated herein for the
4 purpose of alleging forfeiture to the United States of America
5 pursuant to the provisions of Title 21, United States Code,
6 Section 853.

7 2. As a result of the commission of the felony offenses alleged
8 in this indictment, said violations being punishable by imprisonment
9 for more than one year and pursuant to Title 21, United States Code,
10 Section 853(a)(1), defendants NOFEL NOEL SULEYMAN, aka "Jorgee," KARAR
11 ALEKABI, aka "K," ALEN WALID JALU, CHRISTOPHER BALL, aka "C-Bone," and
12 GORDON RALPH WAITS, upon conviction, forfeit to the United States all
13 their rights, title and interest in any and all property constituting,
14 or derived from, any proceeds the Defendants obtained, directly or
15 indirectly, as the result of the offenses.

16 3. As a result of the commission of the felony offenses alleged
17 in this indictment, said violations being punishable by imprisonment
18 for more than one year and pursuant to Title 21, United States Code,
19 Section 853(a)(2), defendants NOFEL NOEL SULEYMAN, aka "Jorgee," KARAR
20 ALEKABI, aka "K," ALEN WALID JALU, CHRISTOPHER BALL, aka "C-Bone," and
21 GORDON RALPH WAITS, shall, upon conviction, forfeit to the United
22 States all their rights, title and interest in any and all property
23 used or intended to be used in any manner or part to commit and to
24 facilitate the commission of the violations alleged in this
25 indictment.

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

3 (a) cannot be located upon the exercise of due diligence;

4 (b) has been transferred or sold to, or deposited with, a
5 third party;

6 (c) has been placed beyond the jurisdiction of the Court;

7 (d) has been substantially diminished in value; or

8 (e) has been commingled with other property which cannot
9 be subdivided without difficulty;

10 it is the intent of the United States, pursuant to Title 21, United
11 States Code, Section 853(p), to seek forfeiture of any other property
12 of the defendant up to the value of the said property listed above as
13 being subject to forfeiture.

14 All in violation of Title 21, United States Code, Section 853.

15 DATED: August 12, 2011.

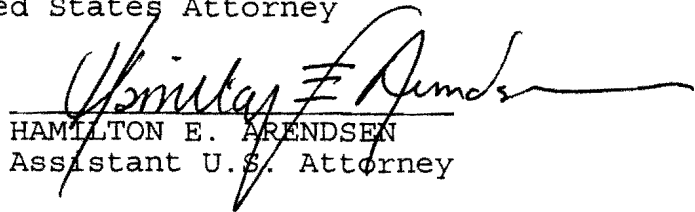
16 A TRUE BILL:

17 

18 Foreperson

19 LAURA E. DUFFY
20 United States Attorney

21 By:


22 HAMILTON E. ARENSEN
23 Assistant U.S. Attorney
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25
26
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