

STATE OF MICHIGAN  
CIRCUIT COURT FOR THE 6<sup>TH</sup> JUDICIAL CIRCUIT  
OAKLAND COUNTY

PEOPLE OF THE STATE OF  
MICHIGAN,

HON. DENISE LANGFORD-MORRIS

Plaintiffs,

v

Bernard Yaldou  
Wissam Shammami,  
Farouk Harajli,  
Shady Abdelhamid,  
Rengachari Vijayaraghavan,  
J & A Quick Stop, Inc.,  
Dequindre Oil Co.,  
Bombay Party Shoppe, Inc.,  
Monster Oil LLC, and  
Durga Lakshmi, Inc.

No. 11-237760-FH  
11-237761-FH  
11-237762-FH  
11-237763-FH  
11-237764-FH  
11-237765-FH  
11-237766-FH  
11-237767-FH  
11-237768-FH AND  
11-237769-FH

Defendants.

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STATE OF MICHIGAN 43rd JUDICIAL DISTRICT 6TH JUDICIAL CIRCUIT	<b>INFORMATION FELONY</b>	DISTRICT: CIRCUIT: 11-237768-FH CTN: 96-11900833-01 AG #: 2011-0005327-A
District Court ORI: MI630145J	Circuit Court ORI: MI630015J	AG ORI: MI820025A
THE PEOPLE OF THE STATE OF MICHIGAN  v  BERNARD JALAL YALDOU 7275 SILVER LEAF LANE WEST BLOOMFIELD, MI 48322		Victim or complainant: State of Michigan   Complaining Witness SA PETE ACKERLY
Co-defendant(s) J & A Quick Stop, Monster Oil, LLC, Shady Mahm Abdelhamid, Bombay Party Shoppe, Inc, Wissam Mansour Shammami, Dequindre Oil Co, Farouk Ali Harajli, Durga Lakeshmi Inc, and Rengachari Vijayaraghavan		Date: On or about February 2011
City/Twp./Village Madison Heights	County in Michigan OAKLAND	Defendant SID 09/06/1990
Charge(s) See Below		Maximum Penalty See Below

STATE OF MICHIGAN, COUNTY OF OAKLAND  
IN THE NAME OF THE PEOPLE OF THE STATE OF MICHIGAN: Bill Schuette, Attorney General for the State of Michigan, appears before the court and informs the court that on the date and at 28945 John R Road, the defendant:

From January 2011 through March 2011, five gas stations in Madison Heights conspired to set their gas prices in order to increase their profits. The stations are all within a two-mile area in Madison Heights, Michigan. Review of pricing evidence obtained from each gas station demonstrated a pattern of pricing that confirmed the existence of a conspiracy between the five stations to set gas prices at a higher price than competing stations. In addition, members of the group pressured another station owner to join their price fixing conspiracy so they would not lose business to him. The stations and individuals involved in the conspiracy include:

- J & A Quick Stop, 12 Mile and John R, Madison Heights, Bernard Jalal Yaldou ("Yaldo"),
- Sphinx- Monster Oil, LLC, 12 Mile & Dequindre Rd , Madison Heights, Shady Mahm Abdelhamid ("Shady"),
- Sunoco- Bombay Party Shoppe, Inc, 11 Mile & John R, Madison Heights, Wissam "Sam" Mansour Shammami ("Sam"),
- Marathon- Dequindre Oil Co, Dequindre Road near I-696, Madison Heights, Farouk Ali Harajli ("Farouk"),
- CITGO- Durga Lakeshmi Inc, 11 Mile and Dequindre, Madison Heights, Rengachari "Vijay" Vijayaraghavan ("Vijay").

**COUNT 1: ANTITRUST VIOLATIONS**

On or about February 8, 2011 - February 9, 2011, defendant did engage in a contract, combination, or conspiracy between 2 or more persons in restraint of, or to monopolize, trade or commerce in a relevant market as prohibited by MCL 445.772 with the intent to accomplish a result prohibited by the Michigan Antitrust Reform Act contrary to MCL 445.779 [445.779];

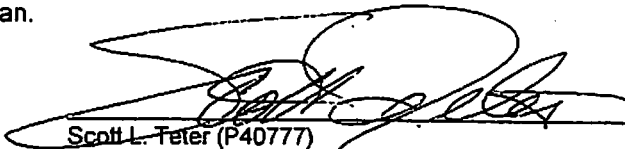
HIGH COURT MISDEMEANOR: 2 years and/or \$10,000.00 fine for an individual: fine of up to \$1,000,000.00 if the defendant is a person other than an individual.

Upon conviction of a felony or an attempted felony court shall order law enforcement to collect DNA identification profiling samples.

and against the peace and dignity of the State of Michigan.

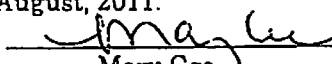
Date

8/12/11

  
\_\_\_\_\_  
Scott L. Feter (P40777)  
Assistant Attorney General  
Corporate Oversight Division  
P.o. Box 30755  
Lansing, MI 48909  
517-373-1160

### PROOF OF SERVICE

The undersigned certifies that a copy of the above document(s) was served upon the attorneys of record or parties appearing *in pro per* in the above cause by mailing the same to them at their respective address, with first class postage fully prepaid thereon, on the 15<sup>th</sup> day of August, 2011.

  
\_\_\_\_\_  
Mary Gee

STATE OF MICHIGAN 43rd JUDICIAL DISTRICT 6TH JUDICIAL CIRCUIT		<b>INFORMATION FELONY</b>		DISTRICT: CIRCUIT: 11-237761-FH CTN: 96-11900827-01 AG#: 2011-0005327-A	
District Court ORI: MI630145J		Circuit Court ORI: MI630015J		AG ORI: MI820025A	
THE PEOPLE OF THE STATE OF MICHIGAN				Victim or complainant: State of Michigan	
v					
WISSAM MANSOUR SHAMMAMI 6531 CHELSEA BRIDGE WEST BLOOMFIELD, MI 48322				Complaining Witness SA PETE ACKERLY	
Co-defendant(s) J & A Quick Stop, Bernard Jalal Yaldou, Monster Oil, LLC, Shady Mahm Abdelhamid, Bombay Party Shoppe, Inc, Dequindre Oil Co, Farouk Ali Harajli, Durga Lakeshmi Inc, and Rengachari Vijayaraghavan				Date: On or about 2-1-2011 - 3-1-2011	
City/Twp./Village Madison Heights	County in Michigan OAKLAND	Defendant SID		Defendant DOB 01/09/1960	
Charge(s) See Below				Maximum Penalty See Below	

**STATE OF MICHIGAN, COUNTY OF OAKLAND**

IN THE NAME OF THE PEOPLE OF THE STATE OF MICHIGAN: Bill Schuette , Attorney General for the State of Michigan, appears before the court and informs the court that on the date and at 130 E. Eleven Mile Road, the defendant:

From January 2011 through March 2011, five gas stations in Madison Heights conspired to set their gas prices in order to increase their profits. The stations are all within a two-mile area in Madison Heights, Michigan. Review of pricing evidence obtained from each gas station demonstrated a pattern of pricing that confirmed the existence of a conspiracy between the five stations to set gas prices at a higher price than competing stations. In addition, members of the group pressured another station owner to join their price fixing conspiracy so they would not lose business to him. The stations and individuals involved in the conspiracy include:

- J & A Quick Stop, 12 Mile and John R, Madison Heights, Bernard Jalal Yaldou ("Yaldo"),
- Sphinx- Monster Oil, LLC, 12 Mile & Dequindre Rd , Madison Heights, Shady Mahm Abdelhamid ("Shady"),
- Sunoco- Bombay Party Shoppe, Inc, 11 Mile & John R, Madison Heights, Wissam "Sam" Mansour Shammami ("Sam"),
- Marathon- Dequindre Oil Co, Dequindre Road near I-696, Madison Heights, Farouk Ali Harajli ("Farouk"),
- CITGO- Durga Lakeshmi Inc, 11 Mile and Dequindre, Madison Heights, Rengachari "Vijay" Vijayaraghavan ("Vijay").

**COUNT 1: ANTITRUST VIOLATIONS**

On or about February 8, 2011 - February 9, 2011, defendant did engage in a contract, combination, or conspiracy between 2 or more persons in restraint of, or to monopolize, trade or commerce in a relevant market as prohibited by MCL 445.772 with the intent to accomplish a result prohibited by the Michigan Antitrust Reform Act contrary to MCL 445.779 [445.779];

HIGH COURT MISDEMEANOR: 2 years and/or \$10,000.00 fine for an individual: fine of up to \$1,000,000.00 if the defendant is a person other than an individual.

**COUNT 2: ANTITRUST VIOLATIONS**

On or about February 11, 2011 - February 13, 2011, defendant did engage in a contract, combination, or conspiracy between 2 or more persons in restraint of, or to monopolize, trade or commerce in a relevant market as prohibited by MCL 445.772 with the intent to accomplish a result prohibited by the Michigan Antitrust Reform Act contrary to MCL 445.779 [445.779];

HIGH COURT MISDEMEANOR: 2 years and/or \$10,000.00 fine for an individual: fine of up to \$1,000,000.00 if the defendant is a person other than an individual.

**COUNT 3: ANTITRUST VIOLATIONS**

On or about February 23, 2011 - February 24, 2011, defendant did engage in a contract, combination, or conspiracy between 2 or more persons in restraint of, or to monopolize, trade or commerce in a relevant market as prohibited by MCL 445.772 with the intent to accomplish a result prohibited by the Michigan Antitrust Reform Act contrary to MCL 445.779 [445.779];

HIGH COURT MISDEMEANOR: 2 years and/or \$10,000.00 fine for an individual: fine of up to \$1,000,000.00 if the defendant is a person other than an individual.

**COUNT 4: ANTITRUST VIOLATIONS**

On or about February 27, 2011, defendant did engage in a contract, combination, or conspiracy between 2 or more persons in restraint of, or to monopolize, trade or commerce in a relevant market as prohibited by MCL 445.772 with the intent to accomplish a result prohibited by the Michigan Antitrust Reform Act contrary to MCL 445.779 [445.779];

HIGH COURT MISDEMEANOR: 2 years and/or \$10,000.00 fine for an individual: fine of up to \$1,000,000.00 if the defendant is a person other than an individual.

**COUNT 5: ANTITRUST VIOLATIONS**

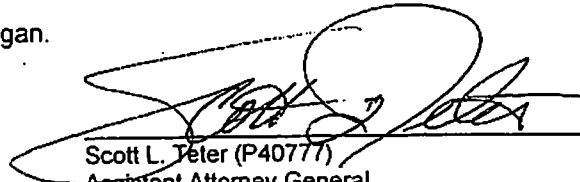
On or about March 1, 2011, defendant did engage in a contract, combination, or conspiracy between 2 or more persons in restraint of, or to monopolize, trade or commerce in a relevant market as prohibited by MCL 445.772 with the intent to accomplish a result prohibited by the Michigan Antitrust Reform Act contrary to MCL 445.779 [445.779];

HIGH COURT MISDEMEANOR: 2 years and/or \$10,000.00 fine for an individual: fine of up to \$1,000,000.00 if the defendant is a person other than an individual.

Upon conviction of a felony or an attempted felony court shall order law enforcement to collect DNA identification profiling samples.

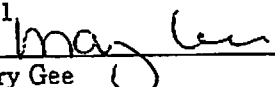
and against the peace and dignity of the State of Michigan.

8/12/11  
Date

  
Scott L. Teter (P40777)  
Assistant Attorney General  
Corporate Oversight Division  
P.o. Box 30755  
Lansing, MI 48909  
517-373-1160

**PROOF OF SERVICE**

The undersigned certifies that a copy of the above document(s) was served upon the attorneys of record or parties appearing *in pro per* in the above cause by mailing the same to them at their respective address, with first class postage fully prepaid thereon, on the 15th day of August, 2011.

  
Mary Gee

STATE OF MICHIGAN 43rd JUDICIAL DISTRICT 6TH JUDICIAL CIRCUIT	<b>INFORMATION FELONY</b>	DISTRICT: CIRCUIT: 11-237762-FH CTN: 96-11900829-01 AG#: 2011-0005327-A
District Court ORI: MI630145J	Circuit Court ORI: MI630015J	AG ORI: MI820025A

THE PEOPLE OF THE STATE OF MICHIGAN		Victim or complainant: State of Michigan
v		
FAROUK ALI HARAJLI 26068 TIMBER TRAIL DEARBORN HEIGHTS, MI 48127		Complaining Witness SA PETE AKERLY
Co-defendant(s) J & A Quick Stop, Bernard Jalal Yaldou, Monster Oil, LLC, Shady Mahm Abdelhamid, Bombay Party Shoppe, Inc, Wissam Mansour Shammami, Dequindre Oil Co, Durga Lakeshmi Inc, and Rengachari Vijayaraghavan		Date: On or about 2-1-2011 - 3-1-2011
City/Twp./Village Madison Heights	County in Michigan OAKLAND	Defendant SID 2044978E
Charge(s) See Below		Defendant DOB 04/02/1972
		Maximum Penalty See Below

STATE OF MICHIGAN, COUNTY OF OAKLAND  
IN THE NAME OF THE PEOPLE OF THE STATE OF MICHIGAN: Bill Schuette , Attorney General for the State of Michigan, appears before the court and informs the court that on the date and at 26461 Dequindre Road, the defendant:

From January 2011 through March 2011, five gas stations in Madison Heights conspired to set their gas prices in order to increase their profits. The stations are all within a two-mile area in Madison Heights, Michigan. Review of pricing evidence obtained from each gas station demonstrated a pattern of pricing that confirmed the existence of a conspiracy between the five stations to set gas prices at a higher price than competing stations. In addition, members of the group pressured another station owner to join their price fixing conspiracy so they would not lose business to him. The stations and individuals involved in the conspiracy include:

- J & A Quick Stop, 12 Mile and John R, Madison Heights, Bernard Jalal Yaldou ("Yaldo"),
- Sphinx- Monster Oil, LLC, 12 Mile & Dequindre Rd , Madison Heights, Shady Mahm Abdelhamid ("Shady"),
- Sunoco- Bombay Party Shoppe, Inc, 11 Mile & John R, Madison Heights, Wissam "Sam" Mansour Shammami ("Sam"),
- Marathon- Dequindre Oil Co, Dequindre Road near I-696, Madison Heights, Farouk Ali Harajli ("Farouk"),
- CITGO- Durga Lakeshmi Inc, 11 Mile and Dequindre, Madison Heights, Rengachari "Vijay" Vijayaraghavan ("Vijay").

**COUNT 1: ANTITRUST VIOLATIONS**

On or about February 8, 2011 - February 9, 2011, defendant did engage in a contract, combination, or conspiracy between 2 or more persons in restraint of, or to monopolize, trade or commerce in a relevant market as prohibited by MCL 445.772 with the intent to accomplish a result prohibited by the Michigan Antitrust Reform Act contrary to MCL 445.779 [445.779];

HIGH COURT MISDEMEANOR: 2 years and/or \$10,000.00 fine for an individual: fine of up to \$1,000,000.00 if the defendant is a person other than an individual.

**COUNT 2: ANTITRUST VIOLATIONS**

On or about February 11, 2011 - February 13, 2011, defendant did engage in a contract, combination, or conspiracy between 2 or more persons in restraint of, or to monopolize, trade or commerce in a relevant market as prohibited by MCL 445.772 with the intent to accomplish a result prohibited by the Michigan Antitrust Reform Act contrary to MCL 445.779 [445.779];

HIGH COURT MISDEMEANOR: 2 years and/or \$10,000.00 fine for an individual: fine of up to \$1,000,000.00 if the defendant is a person other than an individual.

**COUNT 3: ANTITRUST VIOLATIONS**

On or about February 23, 2011 - February 24, 2011, defendant did engage in a contract, combination, or conspiracy between 2 or more persons in restraint of, or to monopolize, trade or commerce in a relevant market as prohibited by MCL 445.772 with the intent to accomplish a result prohibited by the Michigan Antitrust Reform Act contrary to MCL 445.779 [445.779];

HIGH COURT MISDEMEANOR: 2 years and/or \$10,000.00 fine for an individual: fine of up to \$1,000,000.00 if the defendant is a person other than an individual.

**COUNT 4: ANTITRUST VIOLATIONS**

On or about February 27, 2011, defendant did engage in a contract, combination, or conspiracy between 2 or more persons in restraint of, or to monopolize, trade or commerce in a relevant market as prohibited by MCL 445.772 with the intent to accomplish a result prohibited by the Michigan Antitrust Reform Act contrary to MCL 445.779 [445.779];

HIGH COURT MISDEMEANOR: 2 years and/or \$10,000.00 fine for an individual: fine of up to \$1,000,000.00 if the defendant is a person other than an individual.

**COUNT 5: ANTITRUST VIOLATIONS**

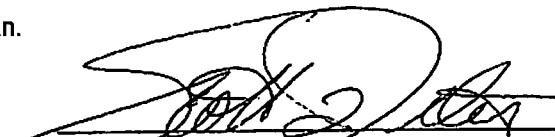
On or about March 1, 2011, defendant did engage in a contract, combination, or conspiracy between 2 or more persons in restraint of, or to monopolize, trade or commerce in a relevant market as prohibited by MCL 445.772 with the intent to accomplish a result prohibited by the Michigan Antitrust Reform Act contrary to MCL 445.779 [445.779];

HIGH COURT MISDEMEANOR: 2 years and/or \$10,000.00 fine for an individual: fine of up to \$1,000,000.00 if the defendant is a person other than an individual.

Upon conviction of a felony or an attempted felony court shall order law enforcement to collect DNA identification profiling samples.

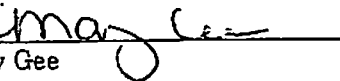
and against the peace and dignity of the State of Michigan.

8/12/11  
Date

  
\_\_\_\_\_  
Scott L. Teter (P40777)  
Assistant Attorney General  
Corporate Oversight Division  
P.o. Box 30755  
Lansing, MI 48909  
517-373-1160

**PROOF OF SERVICE**

The undersigned certifies that a copy of the above document(s) was served upon the attorneys of record or parties appearing *in pro per* in the above cause by mailing the same to them at their respective address, with first class postage fully prepaid thereon, on the 15th day of August, 2011.

  
\_\_\_\_\_  
Mary Gee

STATE OF MICHIGAN 43rd JUDICIAL DISTRICT 6TH JUDICIAL CIRCUIT		<b>INFORMATION FELONY</b>		DISTRICT: CIRCUIT: 11-237763-FH CTN: 96-11900831-01 AG #: 2011-0005327-A	
District Court ORI: MI630145J		Circuit Court ORI: MI630015J		AG ORI: MI820025A	
THE PEOPLE OF THE STATE OF MICHIGAN				Victim or complainant: State of Michigan	
v					
SHADY MOHAMED-MAHM ABDELHAMID 3854 CAMDEN DRIVE STERLING HEIGHTS, MI 48314				Complaining Witness SA PETE ACKERLY	
Co-defendant(s) J & A Quick Stop, Bernard Jalal Yaldou, Monster Oil, LLC, Bombay Party Shoppe, Inc, Wissam Mansour Shammami, Dequindre Oil Co, Farouk Ali Harajli, Durga Lakeshmi Inc, and Rengachari Vijayaraghavan				Date: On or about 2/1/2011 - 3/1/2011	
City/Twp./Village Madison Heights	County in Michigan OAKLAND	Defendant SID		Defendant DOB 07/23/1984	
Charge(s) See Below				Maximum Penalty See Below	

STATE OF MICHIGAN, COUNTY OF OAKLAND  
 IN THE NAME OF THE PEOPLE OF THE STATE OF MICHIGAN: Bill Schuette , Attorney General for the State of Michigan, appears before the court and informs the court that on the date and at 1849 E. Eleven Mile Road, the defendant:

From January 2011 through March 2011, five gas stations in Madison Heights conspired to set their gas prices in order to increase their profits. The stations are all within a two-mile area in Madison Heights, Michigan. Review of pricing evidence obtained from each gas station demonstrated a pattern of pricing that confirmed the existence of a conspiracy between the five stations to set gas prices at a higher price than competing stations. In addition, members of the group pressured another station owner to join their price fixing conspiracy so they would not lose business to him. The stations and individuals involved in the conspiracy include:

- J & A Quick Stop, 12 Mile and John R, Madison Heights, Bernard Jalal Yaldou ("Yaldo"),
- Sphinx- Monster Oil, LLC, 12 Mile & Dequindre Rd , Madison Heights, Shady Mahm Abdelhamid ("Shady"),
- Sunoco- Bombay Party Shoppe, Inc, 11 Mile & John R, Madison Heights, Wissam "Sam" Mansour Shammami ("Sam"),
- Marathon- Dequindre Oil Co, Dequindre Road near I-696, Madison Heights, Farouk Ali Harajli ("Farouk"), CITGO- Durga Lakeshmi Inc, 11 Mile and Dequindre, Madison Heights, Rengachari "Vijay" Vijayaraghavan ("Vijay").

**COUNT 1: ANTITRUST VIOLATIONS**

On or about February 8, 2011 - February 9, 2011, defendant did engage in a contract, combination, or conspiracy between 2 or more persons in restraint of, or to monopolize, trade or commerce in a relevant market as prohibited by MCL 445.772 with the intent to accomplish a result prohibited by the Michigan Antitrust Reform Act contrary to MCL 445.779 [445.779];

HIGH COURT MISDEMEANOR: 2 years and/or \$10,000.00 fine for an individual: fine of up to \$1,000,000.00 if the defendant is a person other than an individual.



**COUNT 2: ANTITRUST VIOLATIONS**

On or about February 11, 2011 - February 13, 2011, defendant did engage in a contract, combination, or conspiracy between 2 or more persons in restraint of, or to monopolize, trade or commerce in a relevant market as prohibited by MCL 445.772 with the intent to accomplish a result prohibited by the Michigan Antitrust Reform Act contrary to MCL 445.779 [445.779];

HIGH COURT MISDEMEANOR: 2 years and/or \$10,000.00 fine for an individual: fine of up to \$1,000,000.00 if the defendant is a person other than an individual.

**COUNT 3: ANTITRUST VIOLATIONS**

On or about February 23, 2011 - February 24, 2011, defendant did engage in a contract, combination, or conspiracy between 2 or more persons in restraint of, or to monopolize, trade or commerce in a relevant market as prohibited by MCL 445.772 with the intent to accomplish a result prohibited by the Michigan Antitrust Reform Act contrary to MCL 445.779 [445.779];

HIGH COURT MISDEMEANOR: 2 years and/or \$10,000.00 fine for an individual: fine of up to \$1,000,000.00 if the defendant is a person other than an individual.

**COUNT 4: ANTITRUST VIOLATIONS**

On or about February 27, 2011, defendant did engage in a contract, combination, or conspiracy between 2 or more persons in restraint of, or to monopolize, trade or commerce in a relevant market as prohibited by MCL 445.772 with the intent to accomplish a result prohibited by the Michigan Antitrust Reform Act contrary to MCL 445.779 [445.779];

HIGH COURT MISDEMEANOR: 2 years and/or \$10,000.00 fine for an individual: fine of up to \$1,000,000.00 if the defendant is a person other than an individual.

**COUNT 5: ANTITRUST VIOLATIONS**

On or about March 1, 2011, defendant did engage in a contract, combination, or conspiracy between 2 or more persons in restraint of, or to monopolize, trade or commerce in a relevant market as prohibited by MCL 445.772 with the intent to accomplish a result prohibited by the Michigan Antitrust Reform Act contrary to MCL 445.779 [445.779];


HIGH COURT MISDEMEANOR: 2 years and/or \$10,000.00 fine for an individual: fine of up to \$1,000,000.00 if the defendant is a person other than an individual.

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and against the peace and dignity of the State of Michigan.

Date

8/12/11

  
Scott L. Teter (P40777)  
Assistant Attorney General  
Corporate Oversight Division  
P.o. Box 30755  
Lansing, MI 48909  
517-373-1160

**PROOF OF SERVICE**

The undersigned certifies that a copy of the above document(s) was served upon the attorneys of record or parties appearing *in pro per* in the above cause by mailing the same to them at their respective address, with first class postage fully prepaid thereon, on the 15th day of August, 2011.

  
Mary Gee

STATE OF MICHIGAN 43rd JUDICIAL DISTRICT 6TH JUDICIAL CIRCUIT	<b>INFORMATION FELONY</b>	DISTRICT: CIRCUIT: 2011-237764-FH CTN: 96-11900835-01 AG#: 2011-0005327-A
District Court ORI: MI630145J	Circuit Court ORI: MI630015J	AG ORI: MI820025A

THE PEOPLE OF THE STATE OF MICHIGAN

v

RENGACHARI VIJAYARAGHAVAN  
747 NISSEN COURT  
WIXOM, MI 48393

Victim or complainant:  
State of Michigan

Complaining Witness  
SA PETE ACKERLY

Co-defendant(s)

J & A Quick Stop, Bernard Jalal Yaldou, Monster Oil, LLC, Shady Mahm Abdelhamid, Bombay Party Shoppe, Inc, Wissam Mansour Shammami, Dequindre Oil Co, Farouk Ali Harajli, and Durga Lakeshmi Inc.

Date: On or about  
2-1-2011 - 3-1-2011

City/Twp./Village  
Madison Heights

County in Michigan  
OAKLAND

Defendant SID

Defendant DOB  
03/28/1946

Charge(s)  
See Below

Maximum Penalty  
See Below

STATE OF MICHIGAN, COUNTY OF OAKLAND

IN THE NAME OF THE PEOPLE OF THE STATE OF MICHIGAN: Bill Schuette , Attorney General for the State of Michigan, appears before the court and informs the court that on the date and at 1950 E. Eleven Mile Road, the defendant:

From January 2011 through March 2011, five gas stations in Madison Heights conspired to set their gas prices in order to increase their profits. The stations are all within a two-mile area in Madison Heights, Michigan. Review of pricing evidence obtained from each gas station demonstrated a pattern of pricing that confirmed the existence of a conspiracy between the five stations to set gas prices at a higher price than competing stations. In addition, members of the group pressured another station owner to join their price fixing conspiracy so they would not lose business to him. The stations and individuals involved in the conspiracy include:

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- Sunoco- Bombay Party Shoppe, Inc, 11 Mile & John R, Madison Heights, Wissam "Sam" Mansour Shammami ("Sam"),
- Marathon- Dequindre Oil Co, Dequindre Road near I-696, Madison Heights, Farouk Ali Harajli ("Farouk"),
- CITGO- Durga Lakeshmi Inc, 11 Mile and Dequindre, Madison Heights, Rengachari "Vijay" Vijayaraghavan ("Vijay").

**COUNT 1: ANTITRUST VIOLATIONS**

On or about February 8, 2011 - February 9, 2011, defendant did engage in a contract, combination, or conspiracy between 2 or more persons in restraint of, or to monopolize, trade or commerce in a relevant market as prohibited by MCL 445.772 with the intent to accomplish a result prohibited by the Michigan Antitrust Reform Act contrary to MCL 445.779 [445.779];

HIGH COURT MISDEMEANOR: 2 years and/or \$10,000.00 fine for an individual: fine of up to \$1,000,000.00 if the defendant is a person other than an individual.

**COUNT 2: ANTITRUST VIOLATIONS**

On or about February 11, 2011 - February 13, 2011, defendant did engage in a contract, combination, or conspiracy between 2 or more persons in restraint of, or to monopolize, trade or commerce in a relevant market as prohibited by MCL 445.772 with the intent to accomplish a result prohibited by the Michigan Antitrust Reform Act contrary to MCL 445.779 [445.779];

HIGH COURT MISDEMEANOR: 2 years and/or \$10,000.00 fine for an individual: fine of up to \$1,000,000.00 if the defendant is a person other than an individual.

**COUNT 3: ANTITRUST VIOLATIONS**

On or about February 23, 2011 - February 24, 2011, defendant did engage in a contract, combination, or conspiracy between 2 or more persons in restraint of, or to monopolize, trade or commerce in a relevant market as prohibited by MCL 445.772 with the intent to accomplish a result prohibited by the Michigan Antitrust Reform Act contrary to MCL 445.779 [445.779];

HIGH COURT MISDEMEANOR: 2 years and/or \$10,000.00 fine for an individual: fine of up to \$1,000,000.00 if the defendant is a person other than an individual.

**COUNT 4: ANTITRUST VIOLATIONS**

On or about February 27, 2011, defendant did engage in a contract, combination, or conspiracy between 2 or more persons in restraint of, or to monopolize, trade or commerce in a relevant market as prohibited by MCL 445.772 with the intent to accomplish a result prohibited by the Michigan Antitrust Reform Act contrary to MCL 445.779 [445.779];

HIGH COURT MISDEMEANOR: 2 years and/or \$10,000.00 fine for an individual: fine of up to \$1,000,000.00 if the defendant is a person other than an individual.

**COUNT 5: ANTITRUST VIOLATIONS**

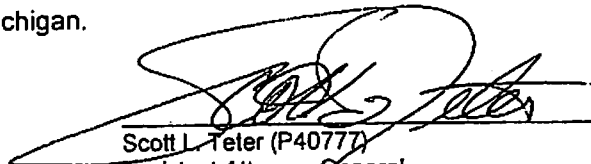
On or about March 1, 2011, defendant did engage in a contract, combination, or conspiracy between 2 or more persons in restraint of, or to monopolize, trade or commerce in a relevant market as prohibited by MCL 445.772 with the intent to accomplish a result prohibited by the Michigan Antitrust Reform Act contrary to MCL 445.779 [445.779];

HIGH COURT MISDEMEANOR: 2 years and/or \$10,000.00 fine for an individual: fine of up to \$1,000,000.00 if the defendant is a person other than an individual.

Upon conviction of a felony or an attempted felony court shall order law enforcement to collect DNA identification profiling samples.


and against the peace and dignity of the State of Michigan.

8/18/11  
Date

  
\_\_\_\_\_  
Scott L. Teter (P40777)  
Assistant Attorney General  
Corporate Oversight Division  
P.o. Box 30755  
Lansing, MI 48909  
517-373-1160

**PROOF OF SERVICE**

The undersigned certifies that a copy of the above document(s) was served upon the attorneys of record or parties appearing *in pro per* in the above cause by mailing the same to them at their respective address, with first class postage fully prepaid thereon, on the 15th day of August, 2011.

  
\_\_\_\_\_  
Mary Gee

STATE OF MICHIGAN 43rd JUDICIAL DISTRICT 6TH JUDICIAL CIRCUIT	<b>INFORMATION FELONY</b>	DISTRICT: CIRCUIT: 11-237765-FH CTN: 96-11900834-01 AG #: 2011-0005327-A
District Court ORI: MI630145J	Circuit Court ORI: MI630015J	AG ORI: MI820025A

THE PEOPLE OF THE STATE OF MICHIGAN		Victim or complainant: State of Michigan
v		
J & A QUICK STOP, INC. JALAL YALDOU, RESIDENT AGENT 28945 JOHN R ROAD MADISON HEIGHTS, MI 48071		Complaining Witness SA PETE ACKERLY
Co-defendant(s) Bernard Jalal Yaldou, Monster Oil, LLC, Shady Mahm Abdelhamid, Bombay Party Shoppe, Inc, Wissam Mansour Shammami, Dequindre Oil Co, Farouk Ali Harajli, Durga Lakeshmi Inc, and Rengachari Vijayaraghavan		Date: On or about 2-1-2011 - 3-1-2011
City/Twp./Village Madison Heights	County in Michigan OAKLAND	Defendant SID
Charge(s) See Below		Maximum Penalty See Below

STATE OF MICHIGAN, COUNTY OF OAKLAND  
IN THE NAME OF THE PEOPLE OF THE STATE OF MICHIGAN: Bill Schuette , Attorney General for the State of Michigan, appears before the court and informs the court that on the date and at 28945 John R Road, the defendant:

From January 2011 through March 2011, five gas stations in Madison Heights conspired to set their gas prices in order to increase their profits. The stations are all within a two-mile area in Madison Heights, Michigan. Review of pricing evidence obtained from each gas station demonstrated a pattern of pricing that confirmed the existence of a conspiracy between the five stations to set gas prices at a higher price than competing stations. In addition, members of the group pressured another station owner to join their price fixing conspiracy so they would not lose business to him. The stations and individuals involved in the conspiracy include:

- J & A Quick Stop, 12 Mile and John R, Madison Heights, Bernard Jalal Yaldou ("Yaldo"),
- Sphinx- Monster Oil, LLC, 12 Mile & Dequindre Rd , Madison Heights, Shady Mahm Abdelhamid ("Shady"),
- Sunoco- Bombay Party Shoppe, Inc, 11 Mile & John R, Madison Heights, Wissam "Sam" Mansour Shammami ("Sam"),
- Marathon- Dequindre Oil Co, Dequindre Road near I-696, Madison Heights, Farouk Ali Harajli ("Farouk"),
- CITGO- Durga Lakeshmi Inc, 11 Mile and Dequindre, Madison Heights, Rengachari "Vijay" Vijayaraghavan ("Vijay").

**COUNT 1: ANTITRUST VIOLATIONS**

On or about February 8, 2011 - February 9, 2011, defendant did engage in a contract, combination, or conspiracy between 2 or more persons in restraint of, or to monopolize, trade or commerce in a relevant market as prohibited by MCL 445.772 with the intent to accomplish a result prohibited by the Michigan Antitrust Reform Act contrary to MCL 445.779 [445.779];

HIGH COURT MISDEMEANOR: 2 years and/or \$10,000.00 fine for an individual: fine of up to \$1,000,000.00 if the defendant is a person other than an individual.

**COUNT 2: ANTITRUST VIOLATIONS**

On or about February 11, 2011 - February 13, 2011, defendant did engage in a contract, combination, or conspiracy between 2 or more persons in restraint of, or to monopolize, trade or commerce in a relevant market as prohibited by MCL 445.772 with the intent to accomplish a result prohibited by the Michigan Antitrust Reform Act contrary to MCL 445.779 [445.779];

HIGH COURT MISDEMEANOR: 2 years and/or \$10,000.00 fine for an individual: fine of up to \$1,000,000.00 if the defendant is a person other than an individual.

**COUNT 3: ANTITRUST VIOLATIONS**

On or about February 23, 2011 - February 24, 2011, defendant did engage in a contract, combination, or conspiracy between 2 or more persons in restraint of, or to monopolize, trade or commerce in a relevant market as prohibited by MCL 445.772 with the intent to accomplish a result prohibited by the Michigan Antitrust Reform Act contrary to MCL 445.779 [445.779];

HIGH COURT MISDEMEANOR: 2 years and/or \$10,000.00 fine for an individual: fine of up to \$1,000,000.00 if the defendant is a person other than an individual.

**COUNT 4: ANTITRUST VIOLATIONS**

On or about February 27, 2011, defendant did engage in a contract, combination, or conspiracy between 2 or more persons in restraint of, or to monopolize, trade or commerce in a relevant market as prohibited by MCL 445.772 with the intent to accomplish a result prohibited by the Michigan Antitrust Reform Act contrary to MCL 445.779 [445.779];

HIGH COURT MISDEMEANOR: 2 years and/or \$10,000.00 fine for an individual: fine of up to \$1,000,000.00 if the defendant is a person other than an individual.

**COUNT 5: ANTITRUST VIOLATIONS**

On or about March 1, 2011, defendant did engage in a contract, combination, or conspiracy between 2 or more persons in restraint of, or to monopolize, trade or commerce in a relevant market as prohibited by MCL 445.772 with the intent to accomplish a result prohibited by the Michigan Antitrust Reform Act contrary to MCL 445.779 [445.779];

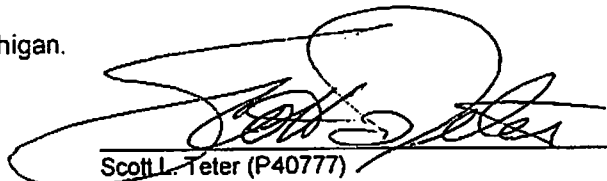
HIGH COURT MISDEMEANOR: 2 years and/or \$10,000.00 fine for an individual: fine of up to \$1,000,000.00 if the defendant is a person other than an individual.

Upon conviction of a felony or an attempted felony court shall order law enforcement to collect DNA identification profiling samples.

and against the peace and dignity of the State of Michigan.

Date

8/12/11

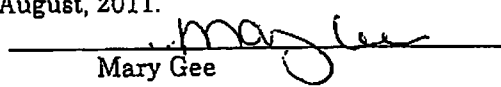


Scott L. Teter (P40777)  
Assistant Attorney General  
Corporate Oversight Division  
P.o. Box 30755  
Lansing, MI 48909  
517-373-1160

**PROOF OF SERVICE**

The undersigned certifies that a copy of the above document(s) was served upon the attorneys of record or parties appearing *in pro per* in the above cause by mailing the same to them at their respective address, with first class postage fully prepaid thereon, on the 15<sup>th</sup> day of August, 2011.

Mary Gee



STATE OF MICHIGAN 43rd JUDICIAL DISTRICT 6TH JUDICIAL CIRCUIT	<b>INFORMATION FELONY</b>	DISTRICT: CIRCUIT: 11-237766-FH CTN: 96-11900830-01 AG#: 2011-0005327-A
District Court ORI: MI630145J	Circuit Court ORI: MI630015J	AG ORI: MI820025A

THE PEOPLE OF THE STATE OF MICHIGAN  v  DEQUINDRE OIL CO. NAHID HAMMAD, RESIDENT AGENT 26461 DEQUINDRE ROAD MADISON HEIGHTS, MI 48071		Victim or complainant: State of Michigan          Complaining Witness SA PETE ACKERLY
Co-defendant(s) J & A Quick Stop, Bernard Jalal Yaldou, Monster Oil, LLC, Shady Mahm Abdelhamid, Bombay Party Shoppe, Inc, Wissam Mansour Shammami, Farouk Ali Harajli, Durga Lakeshmi Inc, and Rengachari Vijayaraghavan		Date: On or about 2-1-2011 - 3-1-2011
City/Twp./Village Madison Heights	County in Michigan OAKLAND	Defendant SID   Defendant DOB
Charge(s) See Below		Maximum Penalty See Below

STATE OF MICHIGAN, COUNTY OF OAKLAND  
IN THE NAME OF THE PEOPLE OF THE STATE OF MICHIGAN: Bill Schuette , Attorney General for the State of Michigan, appears before the court and informs the court that on the date and at 26461 Dequindre Road, the defendant:

From January 2011 through March 2011, five gas stations in Madison Heights conspired to set their gas prices in order to increase their profits. The stations are all within a two-mile area in Madison Heights, Michigan. Review of pricing evidence obtained from each gas station demonstrated a pattern of pricing that confirmed the existence of a conspiracy between the five stations to set gas prices at a higher price than competing stations. In addition, members of the group pressured another station owner to join their price fixing conspiracy so they would not lose business to him. The stations and individuals involved in the conspiracy include:

- J & A Quick Stop, 12 Mile and John R, Madison Heights, Bernard Jalal Yaldou ("Yaldo"),
- Sphinx- Monster Oil, LLC, 12 Mile & Dequindre Rd , Madison Heights, Shady Mahm Abdelhamid ("Shady"),
- Sunoco- Bombay Party Shoppe, Inc, 11 Mile & John R, Madison Heights, Wissam "Sam" Mansour Shammami ("Sam"),
- Marathon- Dequindre Oil Co, Dequindre Road near I-696, Madison Heights, Farouk Ali Harajli ("Farouk"),
- CITGO- Durga Lakeshmi Inc, 11 Mile and Dequindre, Madison Heights, Rengachari "Vijay" Vijayaraghavan ("Vijay").

**COUNT 1: ANTITRUST VIOLATIONS**

On or about February 8, 2011 - February 9, 2011, defendant did engage in a contract, combination, or conspiracy between 2 or more persons in restraint of, or to monopolize, trade or commerce in a relevant market as prohibited by MCL 445.772 with the intent to accomplish a result prohibited by the Michigan Antitrust Reform Act contrary to MCL 445.779 [445.779];

HIGH COURT MISDEMEANOR: 2 years and/or \$10,000.00 fine for an individual: fine of up to \$1,000,000.00 if the defendant is a person other than an individual.

**COUNT 2: ANTITRUST VIOLATIONS**

On or about February 11, 2011 - February 13, 2011, defendant did engage in a contract, combination, or conspiracy between 2 or more persons in restraint of, or to monopolize, trade or commerce in a relevant market as prohibited by MCL 445.772 with the intent to accomplish a result prohibited by the Michigan Antitrust Reform Act contrary to MCL 445.779 [445.779];

HIGH COURT MISDEMEANOR: 2 years and/or \$10,000.00 fine for an individual: fine of up to \$1,000,000.00 if the defendant is a person other than an individual.

**COUNT 3: ANTITRUST VIOLATIONS**

On or about February 23, 2011 - February 24, 2011, defendant did engage in a contract, combination, or conspiracy between 2 or more persons in restraint of, or to monopolize, trade or commerce in a relevant market as prohibited by MCL 445.772 with the intent to accomplish a result prohibited by the Michigan Antitrust Reform Act contrary to MCL 445.779 [445.779];

HIGH COURT MISDEMEANOR: 2 years and/or \$10,000.00 fine for an individual: fine of up to \$1,000,000.00 if the defendant is a person other than an individual.

**COUNT 4: ANTITRUST VIOLATIONS**

On or about February 27, 2011, defendant did engage in a contract, combination, or conspiracy between 2 or more persons in restraint of, or to monopolize, trade or commerce in a relevant market as prohibited by MCL 445.772 with the intent to accomplish a result prohibited by the Michigan Antitrust Reform Act contrary to MCL 445.779 [445.779];

HIGH COURT MISDEMEANOR: 2 years and/or \$10,000.00 fine for an individual: fine of up to \$1,000,000.00 if the defendant is a person other than an individual.

**COUNT 5: ANTITRUST VIOLATIONS**

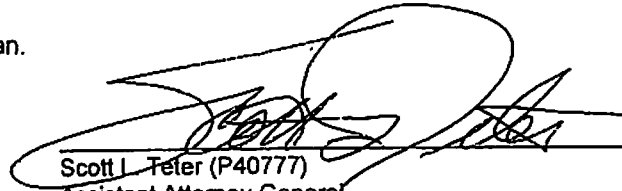
On or about March 1, 2011, defendant did engage in a contract, combination, or conspiracy between 2 or more persons in restraint of, or to monopolize, trade or commerce in a relevant market as prohibited by MCL 445.772 with the intent to accomplish a result prohibited by the Michigan Antitrust Reform Act contrary to MCL 445.779 [445.779];

HIGH COURT MISDEMEANOR: 2 years and/or \$10,000.00 fine for an individual: fine of up to \$1,000,000.00 if the defendant is a person other than an individual.

Upon conviction of a felony or an attempted felony court shall order law enforcement to collect DNA identification profiling samples.


and against the peace and dignity of the State of Michigan.

8/12/11  
Date

  
\_\_\_\_\_  
Scott L. Teter (P40777)  
Assistant Attorney General  
Corporate Oversight Division  
P.o. Box 30755  
Lansing, MI 48909  
517-373-1160

**PROOF OF SERVICE**

The undersigned certifies that a copy of the above document(s) was served upon the attorneys of record or parties appearing *in pro per* in the above cause by mailing the same to them at their respective address, with first class postage fully prepaid thereon, on the 15th day of August, 2011.

  
\_\_\_\_\_  
Mary Gee

STATE OF MICHIGAN 43rd JUDICIAL DISTRICT 6TH JUDICIAL CIRCUIT	<b>INFORMATION FELONY</b>	DISTRICT: CIRCUIT: 11-237767-FH CTN: 96-11900828-01 AG#: 2011-0005327-A
District Court ORI: MI630145J	Circuit Court ORI: MI630015J	AG ORI: MI820025A
THE PEOPLE OF THE STATE OF MICHIGAN  v  BOMBAY PARTY SHOPPE, INC. WISSAM SHAMAMMI, RESIDENT AGENT 6531 CHELSEA BRIDGE WEST BLOOMFIELD, MI 48322		Victim or complainant: State of Michigan   Complaining Witness SA PETE ACKERLY
Co-defendant(s) J & A Quick Stop, Bernard Jalal Yaldou, Monster Oil, LLC, Shady Mahm Abdelhamid, Wissam Mansour Shammami, Dequindre Oil Co, Farouk Ali Harajli, Durga Lakeshmi Inc, and Rengachari Vijayaraghavan		Date: On or about 2-1-2011 - 3-1-2011
City/Twp./Village Madison Heights	County in Michigan OAKLAND	Defendant SID  Defendant DOB
Charge(s) See Below	Maximum Penalty See Below	

STATE OF MICHIGAN, COUNTY OF OAKLAND  
IN THE NAME OF THE PEOPLE OF THE STATE OF MICHIGAN: Bill Schuette, Attorney General for the State of Michigan, appears before the court and informs the court that on the date and at 130 E. Eleven Mile, Road, the defendant:

From January 2011 through March 2011, five gas stations in Madison Heights conspired to set their gas prices in order to increase their profits. The stations are all within a two-mile area in Madison Heights, Michigan. Review of pricing evidence obtained from each gas station demonstrated a pattern of pricing that confirmed the existence of a conspiracy between the five stations to set gas prices at a higher price than competing stations. In addition, members of the group pressured another station owner to join their price fixing conspiracy so they would not lose business to him. The stations and individuals involved in the conspiracy include:

- J & A Quick Stop, 12 Mile and John R, Madison Heights, Bernard Jalal Yaldou ("Yaldo"),
- Sphinx- Monster Oil, LLC, 12 Mile & Dequindre Rd, Madison Heights, Shady Mahm Abdelhamid ("Shady"),
- Sunoco- Bombay Party Shoppe, Inc, 11 Mile & John R, Madison Heights, Wissam "Sam" Mansour Shammami ("Sam"),
- Marathon- Dequindre Oil Co, Dequindre Road near I-696, Madison Heights, Farouk Ali Harajli ("Farouk"),
- CITGO- Durga Lakeshmi Inc, 11 Mile and Dequindre, Madison Heights, Rengachari "Vijay" Vijayaraghavan ("Vijay").

**COUNT 1: ANTITRUST VIOLATIONS**

On or about February 8, 2011 - February 9, 2011, defendant did engage in a contract, combination, or conspiracy between 2 or more persons in restraint of, or to monopolize, trade or commerce in a relevant market as prohibited by MCL 445.772 with the intent to accomplish a result prohibited by the Michigan Antitrust Reform Act contrary to MCL 445.779 [445.779];

HIGH COURT MISDEMEANOR: 2 years and/or \$10,000.00 fine for an individual: fine of up to \$1,000,000.00 if the defendant is a person other than an individual.



**COUNT 2: ANTITRUST VIOLATIONS**

On or about February 11, 2011 - February 13, 2011, defendant did engage in a contract, combination, or conspiracy between 2 or more persons in restraint of, or to monopolize, trade or commerce in a relevant market as prohibited by MCL 445.772 with the intent to accomplish a result prohibited by the Michigan Antitrust Reform Act contrary to MCL 445.779 [445.779];

HIGH COURT MISDEMEANOR: 2 years and/or \$10,000.00 fine for an individual: fine of up to \$1,000,000.00 if the defendant is a person other than an individual.

**COUNT 3: ANTITRUST VIOLATIONS**

On or about February 23, 2011 - February 24, 2011, defendant did engage in a contract, combination, or conspiracy between 2 or more persons in restraint of, or to monopolize, trade or commerce in a relevant market as prohibited by MCL 445.772 with the intent to accomplish a result prohibited by the Michigan Antitrust Reform Act contrary to MCL 445.779 [445.779];

HIGH COURT MISDEMEANOR: 2 years and/or \$10,000.00 fine for an individual: fine of up to \$1,000,000.00 if the defendant is a person other than an individual.

**COUNT 4: ANTITRUST VIOLATIONS**

On or about February 27, 2011, defendant did engage in a contract, combination, or conspiracy between 2 or more persons in restraint of, or to monopolize, trade or commerce in a relevant market as prohibited by MCL 445.772 with the intent to accomplish a result prohibited by the Michigan Antitrust Reform Act contrary to MCL 445.779 [445.779];

HIGH COURT MISDEMEANOR: 2 years and/or \$10,000.00 fine for an individual: fine of up to \$1,000,000.00 if the defendant is a person other than an individual.

**COUNT 5: ANTITRUST VIOLATIONS**

On or about March 1, 2011, defendant did engage in a contract, combination, or conspiracy between 2 or more persons in restraint of, or to monopolize, trade or commerce in a relevant market as prohibited by MCL 445.772 with the intent to accomplish a result prohibited by the Michigan Antitrust Reform Act contrary to MCL 445.779 [445.779];


HIGH COURT MISDEMEANOR: 2 years and/or \$10,000.00 fine for an individual: fine of up to \$1,000,000.00 if the defendant is a person other than an individual.

Upon conviction of a felony or an attempted felony court shall order law enforcement to collect DNA identification profiling samples.

and against the peace and dignity of the State of Michigan.

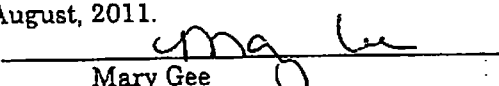
Date

8/12/11

  
Scott L. Teter (P40777)  
Assistant Attorney General  
Corporate Oversight Division  
P.o. Box 30755  
Lansing, MI 48909  
517-373-1160

**PROOF OF SERVICE**

The undersigned certifies that a copy of the above document(s) was served upon the attorneys of record or parties appearing *in pro per* in the above cause by mailing the same to them at their respective address, with first class postage fully prepaid thereon, on the 15th day of August, 2011.

  
Mary Gee

STATE OF MICHIGAN 43rd JUDICIAL DISTRICT 6TH JUDICIAL CIRCUIT	<b>INFORMATION FELONY</b>	DISTRICT: F080221A-E CIRCUIT: 11-237768-FH CTN: 96-11900832-01 AG: 2011-0005327-A
District Court ORI: MI630145J	Circuit Court ORI: MI630015J	AG ORI: MI820025A

THE PEOPLE OF THE STATE OF MICHIGAN		Victim or complainant: State of Michigan
v		
MONSTER OIL LLC SHADY ABDELHAMID, RESIDENT AGENT 23990 GROESBECK HIGHWAY WARREN, MI 48089		
Co-defendant(s) J & A Quick Stop, Bernard Jalal Yaldou, Shady Mahm Abdelhamid, Bombay Party Shoppe, Inc, Wissam Mansour Shammami, Dequindre Oil Co, Farouk Ali Harajli, Durga Lakeshmi Inc, and Rengachari Vijayaraghavan		Complaining Witness SA PETE ACKERLY
Date: On or about 2-1-2011 - 3-1-2011		
City/Twp./Village Madison Heights	County in Michigan OAKLAND	Defendant DOB
Charge(s) See Below		Maximum Penalty See Below

STATE OF MICHIGAN, COUNTY OF OAKLAND  
IN THE NAME OF THE PEOPLE OF THE STATE OF MICHIGAN: Bill Schuette , Attorney General for the State of Michigan, appears before the court and informs the court that on the date and at 1849 E. Eleven Mile Road, the defendant:

From January 2011 through March 2011, five gas stations in Madison Heights conspired to set their gas prices in order to increase their profits. The stations are all within a two-mile area in Madison Heights, Michigan. Review of pricing evidence obtained from each gas station demonstrated a pattern of pricing that confirmed the existence of a conspiracy between the five stations to set gas prices at a higher price than competing stations. In addition, members of the group pressured another station owner to join their price fixing conspiracy so they would not lose business to him. The stations and individuals involved in the conspiracy include:

- J & A Quick Stop, 12 Mile and John R, Madison Heights, Bernard Jalal Yaldou ("Yaldo"),
- Sphinx- Monster Oil, LLC, 12 Mile & Dequindre Rd , Madison Heights, Shady Mahm Abdelhamid ("Shady"),
- Sunoco- Bombay Party Shoppe, Inc, 11 Mile & John R, Madison Heights, Wissam "Sam" Mansour Shammami ("Sam"),
- Marathon- Dequindre Oil Co, Dequindre Road near I-696, Madison Heights, Farouk Ali Harajli ("Farouk"),
- CITGO- Durga Lakeshmi Inc, 11 Mile and Dequindre, Madison Heights, Rengachari "Vijay" Vijayaraghavan ("Vijay").

**COUNT 1: ANTITRUST VIOLATIONS**

On or about February 8, 2011 - February 9, 2011, defendant did engage in a contract, combination, or conspiracy between 2 or more persons in restraint of, or to monopolize, trade or commerce in a relevant market as prohibited by MCL 445.772 with the intent to accomplish a result prohibited by the Michigan Antitrust Reform Act contrary to MCL 445.779 [445.779];

HIGH COURT MISDEMEANOR: 2 years and/or \$10,000.00 fine for an individual: fine of up to \$1,000,000.00 if the defendant is a person other than an individual.

**COUNT 2: ANTITRUST VIOLATIONS**

On or about February 11, 2011 - February 13, 2011, defendant did engage in a contract, combination, or conspiracy between 2 or more persons in restraint of, or to monopolize, trade or commerce in a relevant market as prohibited by MCL 445.772 with the intent to accomplish a result prohibited by the Michigan Antitrust Reform Act contrary to MCL 445.779 [445.779];

HIGH COURT MISDEMEANOR: 2 years and/or \$10,000.00 fine for an individual: fine of up to \$1,000,000.00 if the defendant is a person other than an individual.

**COUNT 3: ANTITRUST VIOLATIONS**

On or about February 23, 2011 - February 24, 2011, defendant did engage in a contract, combination, or conspiracy between 2 or more persons in restraint of, or to monopolize, trade or commerce in a relevant market as prohibited by MCL 445.772 with the intent to accomplish a result prohibited by the Michigan Antitrust Reform Act contrary to MCL 445.779 [445.779];

HIGH COURT MISDEMEANOR: 2 years and/or \$10,000.00 fine for an individual: fine of up to \$1,000,000.00 if the defendant is a person other than an individual.

**COUNT 4: ANTITRUST VIOLATIONS**

On or about February 27, 2011, defendant did engage in a contract, combination, or conspiracy between 2 or more persons in restraint of, or to monopolize, trade or commerce in a relevant market as prohibited by MCL 445.772 with the intent to accomplish a result prohibited by the Michigan Antitrust Reform Act contrary to MCL 445.779 [445.779];

HIGH COURT MISDEMEANOR: 2 years and/or \$10,000.00 fine for an individual: fine of up to \$1,000,000.00 if the defendant is a person other than an individual.

**COUNT 5: ANTITRUST VIOLATIONS**

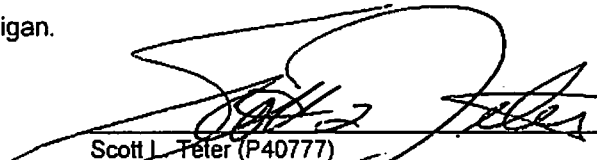
On or about March 1, 2011, defendant did engage in a contract, combination, or conspiracy between 2 or more persons in restraint of, or to monopolize, trade or commerce in a relevant market as prohibited by MCL 445.772 with the intent to accomplish a result prohibited by the Michigan Antitrust Reform Act contrary to MCL 445.779 [445.779];

HIGH COURT MISDEMEANOR: 2 years and/or \$10,000.00 fine for an individual: fine of up to \$1,000,000.00 if the defendant is a person other than an individual.

Upon conviction of a felony or an attempted felony court shall order law enforcement to collect DNA identification profiling samples.

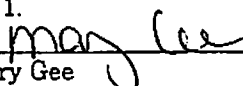
and against the peace and dignity of the State of Michigan.

Date 8/12/11

  
\_\_\_\_\_  
Scott J. Peter (P40777)  
Assistant Attorney General  
Corporate Oversight Division  
P.o. Box 30755  
Lansing, MI 48909  
517-373-1160

**PROOF OF SERVICE**

The undersigned certifies that a copy of the above document(s) was served upon the attorneys of record or parties appearing *in pro per* in the above cause by mailing the same to them at their respective address, with first class postage fully prepaid thereon, on the 15th day of August, 2011.

  
\_\_\_\_\_  
Mary Gee

STATE OF MICHIGAN 43rd JUDICIAL DISTRICT 6TH JUDICIAL CIRCUIT		<b>INFORMATION FELONY</b>		DISTRICT: CIRCUIT: 11-237769-FH CTN: 96-11900836-01 AG#: 2011-0005327-A	
District Court ORI: MI630145J		Circuit Court ORI: MI630015J		AG ORI: MI820025A	
THE PEOPLE OF THE STATE OF MICHIGAN				Victim or complainant: State of Michigan	
v					
DURGA LAKSHMI, INC. JANAKI VIJAYARAGHAVAN, RESIDENT AGENT 747 NISSEN COURT WIXOM, MI 48393				Complaining Witness SA PETE ACKERLY	
Co-defendant(s) J & A Quick Stop, Bernard Jalal Yaldou, Monster Oil, LLC, Shady Mahm Abdelhamid, Bombay Party Shoppe, Inc, Wissam Mansour Shammami, Dequindre Oil Co, Farouk Ali Harajli and Rengachari Vijayaraghavan				Date: On or about 2-1-2011 - 3-1-2011	
City/Twp./Village Madison Heights	County in Michigan OAKLAND	Defendant SID		Defendant DOB	
Charge(s) See Below				Maximum Penalty See Below	

STATE OF MICHIGAN, COUNTY OF OAKLAND  
 IN THE NAME OF THE PEOPLE OF THE STATE OF MICHIGAN: Bill Schuette , Attorney General for the State of Michigan, appears before the court and informs the court that on the date and at 1950 E. Eleven Mile Road, the defendant:

From January 2011 through March 2011, five gas stations in Madison Heights conspired to set their gas prices in order to increase their profits. The stations are all within a two-mile area in Madison Heights, Michigan. Review of pricing evidence obtained from each gas station demonstrated a pattern of pricing that confirmed the existence of a conspiracy between the five stations to set gas prices at a higher price than competing stations. In addition, members of the group pressured another station owner to join their price fixing conspiracy so they would not lose business to him. The stations and individuals involved in the conspiracy include:

- J & A Quick Stop, 12 Mile and John R, Madison Heights, Bernard Jalal Yaldou ("Yaldo"),
- Sphinx- Monster Oil, LLC, 12 Mile & Dequindre Rd , Madison Heights, Shady Mahm Abdelhamid ("Shady"),
- Sunoco- Bombay Party Shoppe, Inc, 11 Mile & John R, Madison Heights, Wissam "Sam" Mansour Shammami ("Sam"),
- Marathon- Dequindre Oil Co, Dequindre Road near I-696, Madison Heights, Farouk Ali Harajli ("Farouk"),
- CITGO- Durga Lakeshmi Inc, 11 Mile and Dequindre, Madison Heights, Rengachari "Vijay" Vijayaraghavan ("Vijay").

**COUNT 1: ANTITRUST VIOLATIONS**

On or about February 8, 2011 - February 9, 2011, defendant did engage in a contract, combination, or conspiracy between 2 or more persons in restraint of, or to monopolize, trade or commerce in a relevant market as prohibited by MCL 445.772 with the intent to accomplish a result prohibited by the Michigan Antitrust Reform Act contrary to MCL 445.779 [445.779];

HIGH COURT MISDEMEANOR: 2 years and/or \$10,000.00 fine for an individual: fine of up to \$1,000,000.00 if the defendant is a person other than an individual.

**COUNT 2: ANTITRUST VIOLATIONS**

On or about February 11, 2011 - February 13, 2011, defendant did engage in a contract, combination, or conspiracy between 2 or more persons in restraint of, or to monopolize, trade or commerce in a relevant market as prohibited by MCL 445.772 with the intent to accomplish a result prohibited by the Michigan Antitrust Reform Act contrary to MCL 445.779 [445.779];

HIGH COURT MISDEMEANOR: 2 years and/or \$10,000.00 fine for an individual: fine of up to \$1,000,000.00 if the defendant is a person other than an individual.

**COUNT 3: ANTITRUST VIOLATIONS**

On or about February 23, 2011 - February 24, 2011, defendant did engage in a contract, combination, or conspiracy between 2 or more persons in restraint of, or to monopolize, trade or commerce in a relevant market as prohibited by MCL 445.772 with the intent to accomplish a result prohibited by the Michigan Antitrust Reform Act contrary to MCL 445.779 [445.779];

HIGH COURT MISDEMEANOR: 2 years and/or \$10,000.00 fine for an individual: fine of up to \$1,000,000.00 if the defendant is a person other than an individual.

**COUNT 4: ANTITRUST VIOLATIONS**

On or about February 27, 2011, defendant did engage in a contract, combination, or conspiracy between 2 or more persons in restraint of, or to monopolize, trade or commerce in a relevant market as prohibited by MCL 445.772 with the intent to accomplish a result prohibited by the Michigan Antitrust Reform Act contrary to MCL 445.779 [445.779];

HIGH COURT MISDEMEANOR: 2 years and/or \$10,000.00 fine for an individual: fine of up to \$1,000,000.00 if the defendant is a person other than an individual.

**COUNT 5: ANTITRUST VIOLATIONS**

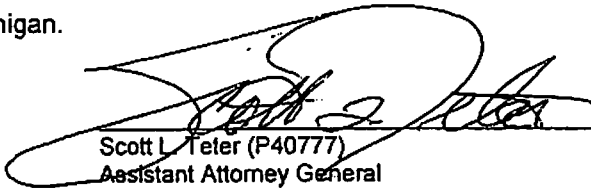
On or about March 1, 2011, defendant did engage in a contract, combination, or conspiracy between 2 or more persons in restraint of, or to monopolize, trade or commerce in a relevant market as prohibited by MCL 445.772 with the intent to accomplish a result prohibited by the Michigan Antitrust Reform Act contrary to MCL 445.779 [445.779];

HIGH COURT MISDEMEANOR: 2 years and/or \$10,000.00 fine for an individual: fine of up to \$1,000,000.00 if the defendant is a person other than an individual.

Upon conviction of a felony or an attempted felony court shall order law enforcement to collect DNA identification profiling samples.

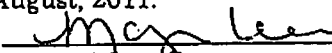
and against the peace and dignity of the State of Michigan.

8/12/11  
Date

  
Scott L. Teter (P40777)  
Assistant Attorney General  
Corporate Oversight Division  
P.o. Box 30755  
Lansing, MI 48909  
517-373-1160

**PROOF OF SERVICE**

The undersigned certifies that a copy of the above document(s) was served upon the attorneys of record or parties appearing *in pro per* in the above cause by mailing the same to them at their respective address, with first class postage fully prepaid thereon, on the 15th day of August, 2011.

  
Mary Gee