STATE OF MICHIGAN CIRCUIT COURT FOR THE 6^{TH} JUDICIAL CIRCUIT OAKLAND COUNTY

PEOPLE OF THE STATE OF MICHIGAN,

HON. DENISE LANGFORD-MORRIS

Plaintiffs,

v	
Bernard Yaldou	No. 11-237760-FH
Wissam Shammami,	11-237761-FH
Farouk Harajli,	11-237762-FH
Shady Abdelhamid,	11-237763-FH
Rengachari Vijayaraghavan,	11-237764-FH
J & A Quick Stop, Inc.,	11-237765-FH
Dequindre Oil Co.,	11-237766-FH
Bombay Party Shoppe, Inc.,	11-237767-FH
Monster Oil LLC, and	11-237768-FH AND
Durga Lakshmi, Inc.	11-237769-FH

Defendants.

STATE OF MICHIGAN 43rd JUDICIAL DISTRICT 6TH JUDICIAL CIRCUIT	INFORMATION FELONY	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 M	Victim or complainant: State of Michigan	
V		
BERNARD JALAL YALDOU 7275 SILVER LEAF LANE WEST BLOOMFIELD, MI 48322		
		Complaining Witness SA PETE ACKERLY
Co-defendant(s) J & A Quick Stop, Monster Oil, LLC Shoppe, Inc, Wissam Mansour Sh Durga Lakeshmi Inc, and Rengach	C, Shady Mahm Abdelhamid, Bombay Part ammami, Dequindre Oil Co, Farouk Ali Har nari Vijayaraghayan	Date: On or about y February 2011 ajli,
City/Typ Afillage County in Mic	Defendant DOB	

STATE OF MICHIGAN, COUNTY OF OAKLAND

Madison Heights

Charge(s)

See Below

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:

09/06/1990

See Below

Maximum Penalty

- 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];

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

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

PROOF OF SERVICE

STATE OF MICHIGAN 43rd JUDICIAL DISTRICT **INFORMATION** DISTRICT: **6TH JUDICIAL CIRCUIT** CIRCUIT: 11-237761-FH **FELONY** CTN: 96-11900827-01 AG#: 2011-0005327-A District Court ORI: MI630145J Circuit Court ORI: MI630015J AG ORI: MI820025A Victim or complainant: State of Michigan THE PEOPLE OF THE STATE OF MICHIGAN ٧ WISSAM MANSOUR SHAMMAMI 6531 CHELSEA BRIDGE WEST BLOOMFIELD, MI 48322 Complaining Witness SA PETE ACKERLY Co-defendant(s) Date: On or about J & A Quick Stop, Bernard Jalal Yaldou, Monster Oil, LLC, Shady Mahm 2-1-2011 - 3-1-2011 Abdelhamid, Bombay Party Shoppe, Inc. Dequindre Oil Co. Farouk Ali Haraili, Durga Lakeshmi Inc. and Rengachari Vijavaraghavan

Defendant DOB

Maximum Penalty

01/09/1960

See Below

STATE OF MICHIGAN, COUNTY OF OAKLAND

County in Michigan

OAKLAND

City/Two./Village

Charge(s)

See Below

Madison Heights

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:

Defendant SID

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];

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

Scott L. Teter (P40777)

Assistant Attorney General
Corporate Oversight Division
P.o. Box 30755

Lansing, MI 48909 517-373-1160

PROOF OF SERVICE

STATE OF MICHIGAN 43rd JUDICIAL DISTRICT INFORMATION DISTRICT: 6TH JUDICIAL CIRCUIT CIRCUIT: 11-237762-FH **FELONY** CTN: 96-11900829-01 AG#: 2011-0005327-A District Court ORI: MI630145J Circuit Court ORI: MI630015J AG ORI: MI820025A Victim or complainant: State of Mcihigan THE PEOPLE OF THE STATE OF MICHIGAN FAROUK ALI HARAJLI 26068 TIMBER TRAIL DEARBORN HEIGHTS, MI 48127 Complaining Witness SA PETE AKERLY Co-defendant(s) Date: On or about 2-1-2011 - 3-1-2011 J & A Quick Stop, Bernard Jalal Yaldou, Monster Oil, LLC, Shady Mahm Abdelhamid, Bombay Party Shoppe, Inc, Wissam Mansour Shammami, Deguindre Oil Co. Durga Lakeshmi Inc. and Rengachari Vijayaraghavan City/Twp./Village County in Michigan Defendant SID Defendant DOB 2044978E 04/02/1972 Madison Heights OAKLAND

STATE OF MICHIGAN, COUNTY OF OAKLAND

Charge(s)

See Below

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:

Maximum Penalty

See Below

- 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" Vijayaraqhavan ("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];

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.

Scott L. Teter (P40777)
Assistant Attorney General
Corporate Oversight Division
P.o. Box 30755

Lansing, MI 48909 517-373-1160

PROOF OF SERVICE

STATE OF MICHIGAN 43rd JUDICIAL DISTRICT 6TH JUDICIAL CIRCUIT

INFORMATION **FELONY**

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

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, 2/1/2011 - 3/1/2011

Date: On or about

Inc, Wissam Mansour Shammami, Dequindre Oil Co, Farouk Ali Harajli, Durga

Lakeshmi Inc. and Rengachari Vijayaraghavan

Defendant DOB

City/Twp./Village Madison Heights County in Michigan OAKLAND

Defendant SID

07/23/1984 Maximum Penalty

Charge(s) See Below

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];

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.

_

Scott L. Teter (P40777

Assistant Attorney General

Corporate Oversight Division

P.o. Box 30755

Lansing, MI 48909

517-373-1160

PROOF OF SERVICE

STATE OF MICHIGAN DISTRICT: INFORMATION 43rd JUDICIAL DISTRICT CIRCUIT: 2011-237764-FH 6TH JUDICIAL CIRCUIT **FELONY** CTN: 96-11900835-01 AG#: 2011-0005327-A AG ORI: MI820025A Circuit Court ORI: MI630015J District Court ORI: MI630145J Victim or complainant: State of Michigan THE PEOPLE OF THE STATE OF MICHIGAN RENGACHARI VIJAYARAGHAVAN 747 NISSEN COURT WIXOM, MI 48393 Complaining Witness SA PETE ACKERLY Date: On or about Co-defendant(s) 2-1-2011 - 3-1-2011 J & A Quick Stop, Bernard Jalal Yaldou, Monster Oil, LLC, Shady Mahm Abdelhamid, Bombay Party Shoppe, Inc, Wissam Mansour Shammami,

STATE OF MICHIGAN, COUNTY OF OAKLAND

Citv/Twp./Village

Charge(s)

See Below

Madison Heights

Deguindre Oil Co, Farouk Ali Harajli, and Durga Lakeshmi Inc.

OAKLAND

County in Michigan

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:

Defendant SID

Defendant DOB

Maximum Penalty

03/28/1946

See Below

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
- 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];

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.

Scott LaTeter (P4077

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 ____day of August, 2011.

STATE OF MICHIGAN 43rd JUDICIAL DISTRICT 6TH JUDICIAL CIRCUIT		INFORMATION FELONY	CIRC CTN:	RICT: :UIT: 11-237765-FH 96-11900834-01 : 2011-0005327-A
District Court ORI: MI630145J	Circu	uit Court ORI: MI630015J	AG O	RI: MI820025A
THE PEOPLE OF THE ST	TATE OF MICHIGAN	J		Victim or complainant: State of Michigan
v				
J & A QUICK STOP, INC. JALAL YALDOU, RESIDE 28945 JOHN R ROAD MADISON HEIGHTS, MI	ENT AGENT			
				Complaining Witness SA PETE ACKERLY
	ansour Shammam	hady Mahm Abdelhamid, Boi ii, Dequindre Oil Co, Farouk i yaraghavan		Date: On or about 2-1-2011 - 3-1-2011
City/Twp./Village Madison Heights	County in Michigan OAKLAND	Defendant SID		Defendant DOB

STATE OF MICHIGAN, COUNTY OF OAKLAND

Charge(s)

See Below

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:

Maximum Penalty

See Below

- 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];

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.

Mindre

Assistant Attorney General Corporate Oversight Division P.o. Box 30755

Lansing, MI 48909 517-373-1160

PROOF OF SERVICE

STATE OF MICHIGAN 43rd JUDICIAL DISTRICT INFORMATION DISTRICT: **6TH JUDICIAL CIRCUIT** CIRCUIT: 11-237766-FH FELONY CTN: 96-11900830-01 AG#: 2011-0005327-A District Court ORI: MI630145J Circuit Court ORI: MI630015J AG ORI: MI820025A Victim or complainant: State of Michigan THE PEOPLE OF THE STATE OF MICHIGAN DEQUINDRE OIL CO. NAHID HAMMAD, RESIDENT AGENT 26461 DEQUINDRE ROAD MADISON HEIGHTS, MI 48071 Complaining Witness SA PETE ACKERLY Co-defendant(s) Date: On or about J & A Quick Stop, Bernard Jalal Yaldou, Monster Oil, LLC, Shady Mahm 2-1-2011 - 3-1-2011 Abdelhamid, Bombay Party Shoppe, Inc., Wissam Mansour Shammami, Farouk Ali Harajli, Durga Lakeshmi Inc, and Rengachari Vijayaraghavan

STATE OF MICHIGAN, COUNTY OF OAKLAND

County in Michigan

OAKLAND

City/Twp./Village

Charge(s)

See Below

Madison Heights

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:

Defendant SID

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:

Defendant DOB

Maximum Penalty

See Below

- 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]:

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

Scott L Feter (P40777)

Assistant Attorney General Corporate Oversight Division

P.o. Box 30755

Lansing, MI 48909

517-373-1160

PROOF OF SERVICE

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

STATE OF MICHIGAN, COUNTY OF OAKLAND

Charge(s)

See Below

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:

Maximum Penalty

See Below

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]:

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.

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 _____day of August, 2011.

STATE OF MICHIGA	PSS feetings.		DISTRICT: F080221A-E		
43rd JUDICIAL DISTI		INFORMATION	CIRC	UIT: 11-237768-FH	
6TH JUDICIAL CIRCL	JIT			CTN: 96-11900832-01	
		ILLONI	AG: 2	011-0005327-A	
District Court ORI: MI6301	45J C	ircuit Court ORI: MI630015J	AG O	AG ORI: MI820025A	
				Victim or complainant:	
THE PEOPLE OF THE STATE OF MICHIGAN			State of Michigan		
v					
MONSTER OIL LLC				9	
SHADY ABDELHAM	ID, RESIDENT AGEN	T [*]			
23990 GROESBECK	HIGHWAY				
WARREN, MI 48089	3				
	e			Complaining Witness SA PETE ACKERLY	
Co-defendant(s)			Date: On or about		
			2-1-2011 - 3-1-2011		
Party Shoppe, Inc, \	Nissam Mansour Sh	ammami, Dequindre Oil Co, Fa	arouk Ali		
Harajli, Durga Lakes	shmi Inc, and Renga	chari Vijayaraghavan			
City/Twp./Village	County in Michigan	Defendant SID		Defendant DOB	
Madison Heights	OAKLAND				

STATE OF MICHIGAN, COUNTY OF OAKLAND

Charge(s)

See Below

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:

Maximum Penalty

See Below

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];

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 1445.7791:

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.

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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 day of August, 2011.

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

STATE OF MICHIGAN, COUNTY OF OAKLAND

OAKLAND

Madison Heights

Charge(s)

See Below

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:

Maximum Penalty

See Below

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]:

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.

Scott L Teter (P40777)

Aesistant Attorney General

Corporate Oversight Division

P.o. Box 30755 Lansing, MI 48909 517-373-1160

PROOF OF SERVICE