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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

Case:2:17-cr-20595
Judge: Battani, Marianne O.
MJ: Stafford, Elizabeth A.
Filed: 09-07-2017 At 03:32 PM
INDI USA v. RAMADAN (SO)

v.

VIOLATION: 18 U.S.C. § 922(k)

D-1 YOUSEF MOHAMMAD RAMADAN,

Defendant.

_____ /

INDICTMENT

THE GRAND JURY CHARGES:

COUNT ONE

(18 U.S.C. 922(k) -- Knowing Possession of a Firearm with an Obliterated
Serial Number, Which Had Been Shipped in Interstate Commerce)

1. From approximately April, 2016, up to and including August 23,
2017, Defendant Yousef Mohammad Ramadan used a storage unit at Devon Self
Storage, 4750 South State Road, Ann Arbor, Michigan, to possess various
firearms, firearm parts, and other items.

2. On August 23, 2017, Defendant Yousef Mohammad Ramadan

knowingly possessed a firearm, that is, a Jennings J-22, silver plated semi-automatic handgun with a black grip, which fires .22 LR bullets, which firearm had the manufacturer's serial number removed, obliterated, and altered. At some time, the firearm had been shipped or transported in interstate commerce.

In violation of Section 922(k) of Title 18, United States Code.

COUNT TWO

(18 U.S.C. 922(k) -- Knowing Possession of a Firearm with an Obliterated Serial Number, Which Had Been Shipped in Interstate Commerce)

1. The allegations of Paragraph One of Count One are incorporated by reference.

2. On August 23, 2017, Defendant Yousef Mohammad Ramadan knowingly possessed a firearm, that is, a Ruger Mk. II .22 caliber black semi-automatic handgun with a small Ruger logo on the handgun, which firearm had the manufacturer's serial number removed, obliterated, and altered. At some time, the firearm had been shipped or transported in interstate commerce.

In violation of Section 922(k) of Title 18, United States Code.

THIS IS A TRUE BILL.

s/ Grand Jury Foreperson
GRAND JURY FOREPERSON

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Acting United States Attorney

s/ Jonathan Tukel
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Dated: September 7, 2017

United States District Court Eastern District of Michigan	Criminal Case Cov
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NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to comp

Companion Case Information	Companion Case Number:
This may be a companion case based upon LCrR 57.10 (b)(4) ¹ :	Judge Assigned:
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	AUSA's Initials:

Case Title: USA v. D-1 YOUSEF MOHAMMAD RAMADAN

County where offense occurred : Washtenaw County, MI

Check One: **Felony** **Misdemeanor** **Petty**

Indictment/ Information --- no prior complaint.
 Indictment/ Information --- based upon prior complaint [Case number: 17-mj-30426]
 Indictment/ Information --- based upon LCrR 57.10 (d) [Complete Superseding section below].

Superseding Case Information

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

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

<u>Defendant name</u>	<u>Charges</u>	<u>Prior Complaint (if applicable)</u>
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Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.

September 7, 2017
 Date

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 Attorney Bar #:

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