

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
WESTERN DIVISION

UNITED STATES OF AMERICA)
)
) v. No. 10 CR 50082
) Violations: Title 18, United States
MOHAMMED HARIZ and) Code, Section 371 and 2320
ABDUL HARIZ)

COUNT ONE

The SEPTEMBER 2010 GRAND JURY charges:

Between on or about August 19, 2010, and on or about September 30, 2010, at Rockford, in the Northern District of Illinois, Western Division, and elsewhere,

MOHAMMED HARIZ and
ABDUL HARIZ,

defendants herein, conspired with each other and with others known and unknown to the Grand Jury to commit an offense against the United States, namely to intentionally traffick in counterfeit goods and knowingly use a counterfeit mark on or in connection with the goods, the use of which was likely to cause confusion, to cause mistake, and to deceive, in violation of Title 18, United States Code, Section 2320, and in order to effect the object of the conspiracy, did one or more of the following acts:

1. on or about August 19, 2010, at the Fashion Store located on West State Street in Rockford, Illinois, defendant Mohammed Hariz sold shirts, shoes, jeans, and shorts, all of which were counterfeit goods and which bore counterfeit marks on or in connection with the goods; and

2. on or about September 30, 2010, at the Fashion Store located on West State Street in Rockford, Illinois, defendant Abdul Hariz sold t-shirts, shorts, and shoes, all of which were counterfeit goods and which bore counterfeit marks on or in connection with the goods;

In violation of Title 18, United States Code, Section 371.

COUNT TWO

The SEPTEMBER 2010 GRAND JURY further charges:

On or about August 19, 2010, at Rockford, in the Northern District of Illinois,
Western Division,

MOHAMMED HARIZ,

defendant herein, did intentionally traffick and attempt to traffick in goods, namely articles of apparel and shoes, and knowingly used a counterfeit mark on or in connection with such goods, the use of which was likely to cause confusion, to cause mistake, and to deceive;

In violation of Title 18, United States Code, Section 2320.

COUNT THREE

The SEPTEMBER 2010 GRAND JURY further charges:

On or about September 30, 2010, at Rockford, in the Northern District of Illinois,
Western Division,

ABDUL HARIZ,

defendant herein, did intentionally traffick and attempt to traffick in goods, namely articles of apparel and shoes, and knowingly used a counterfeit mark on or in connection with such goods, the use of which was likely to cause confusion, to cause mistake, and to deceive;

In violation of Title 18, United States Code, Section 2320.

A TRUE BILL:

FOREPERSON

UNITED STATES ATTORNEY