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**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

D-1 HUSSEIN ADAN BAZZI,

Defendant.

Case:2:22-cr-20363

Judge: Michelson, Laurie J.

MJ: Stafford, Elizabeth A.

Filed: 07-13-2022 At 04:15 PM

INDI USA V. BAZZI (NA)

VIOLATION:

18 U.S.C. § 1343 – Wire Fraud

\_\_\_\_\_ /

**INDICTMENT**

The Grand Jury charges:

**GENERAL ALLEGATIONS**

At all times relevant to this Indictment:

1. **HUSSEIN ADNAN BAZZI (BAZZI)** (D-1) was a resident of Dearborn, Michigan, and was the owner of “A-Star Valet of Michigan” (A-Star).
2. **A-Star** was a company that provided valet services to various small businesses in the Detroit metropolitan area.
3. **“Renaissance Center Detroit”** (Ren Cen) was a limited partnership that operated from the Renaissance Center office building in Detroit, Michigan. Ren Cen did not have a contract for valet services with A-Star.

4. **“Somerset Collection”** (Somerset) was a limited partnership that operated a luxury retail center in Troy, Michigan. Somerset did not have a contract for valet services with A-Star.
5. **“MotorCity Casino and Hotel”** (MotorCity) was a limited partnership that operated a casino and luxury hotel in Detroit, Michigan. MotorCity did not have a contract for valet services with A-Star.
6. **“Cedar Fair Entertainment”** (Cedar Fair) was a limited partnership that operated Cedar Point Amusement Park in Sandusky, Ohio. Cedar Fair did not have a contract for valet services with A-Star.
7. **“Henry Ford Hospital”** (Henry Ford) was a hospital group doing business in the State of Michigan. Henry Ford did not have a contract for valet services with A-Star.
8. **“MGM Grand Detroit”** was a casino located and doing business in Detroit, Michigan. MGM Grand Detroit did not have a contract for valet services with A-Star.
9. **D.I.**, was a well-known and prosperous Michigan business owner who did not have a business or investment relationship of any kind with **BAZZI**, A-Star, or any related entity.
10. **A.M.**, was the owner of several night clubs in the Detroit Metropolitan area.
11. **E.P.** was a businessman in the Detroit metropolitan area.

12. AOL was an email provider that maintained its email servers at data centers in the Commonwealth of Virginia. Every email message sent to or from an AOL email account passed through one of the AOL servers in the Commonwealth of Virginia.

### **THE SCHEME**

13. In or about August 2017, through in or about January 2019, in the Eastern District of Michigan, Southern Division, defendant **BAZZI**, having devised a scheme and artifice to defraud and for obtaining money by means of false and fraudulent material pretenses, representations and promises, did the following:

#### **Victim A.M.**

14. On or about June 1, 2018, **BAZZI**, with intent to defraud, solicited a \$200,000 investment from A.M. by telling him that A-Star had secured a lucrative, six-year contract with Ren Cen.

15. To trick and induce A.M. into giving him \$200,000, **BAZZI** gave A.M. a false and fraudulent contract purporting to show that Ren Cen had contracted with A-Star for valet services.

16. On or about June 27, 2018, **BAZZI**, with intent to defraud, solicited a \$500,000 investment from A.M. by telling him that A-Star had secured lucrative valet contracts with Somerset, Cedar Fair and MotorCity.

17. To trick and induce A.M. into giving him \$500,000, **BAZZI** gave A.M. false and fraudulent contracts purporting to show that Somerset, Cedar Fair and MotorCity had contracted with A-Star for valet services.

18. In a continuing effort to induce A.M. into giving him money, **BAZZI** gave A.M. fraudulent emails, contracts, and correspondence purporting to show that D.I. was investing in valet ventures with A-Star.

19. To hide the fraud and to lull A.M. into believing the investments were legitimate, **BAZZI** made three payments to A.M. claiming the funds represented a return on A.M.'s investment. The effect of these payments was to induce A.M. into continuing to invest with **BAZZI**. Ultimately A.M. gave **BAZZI** over \$1,000,000.

#### **Victim E.P.**

20. In or about February 2018, **BAZZI**, with intent to defraud, solicited a \$125,000 investment from E.P. by telling him that A-Star had secured a lucrative valet contract with MGM Grand Detroit.

21. To trick and induce E.P. into giving him \$125,000, on February 11, 2018, **BAZZI** emailed E.P. false and fraudulent profit and loss statements, cash flow statements, and a balance sheet purporting to show, based on past performance, how lucrative the contract between A-Star and MGM Grand Detroit would be.

22. On or about February 23, 2018, **BAZZI**, with intent to defraud, and to obtain money by means of false and fraudulent material representations and promises emailed E.P. a fraudulent contract for valet services purporting to be between MGM Grand Detroit and A-Star.

**COUNT ONE**

(18 U.S.C. § 1343 - Wire Fraud)

**D-1 HUSSEIN ADNAN BAZZI**

The general allegations are included in this count.

23. For the purpose of executing the scheme, and to obtain money by means of false and fraudulent material pretenses, promises, and representations, on June 27, 2018, **BAZZI** transmitted and caused the transmission by means of wire communication in interstate or foreign commerce, writings, signs, signals, pictures or sounds, in the form of a wire transfer of funds in the amount of \$500,000 from A.M.'s UBS AG Bank account in New York, to **BAZZI**'s Bank of America account in Dearborn Michigan.

All in violation of Title 18, United States Code, Section 1343.

**COUNT TWO**

(18 U.S.C. § 1343 - Wire Fraud)

**D-1 HUSSEIN ADNAN BAZZI**

The general allegations are included in this count.

24. For the purpose of executing the scheme, and to obtain money by means

of false and fraudulent material pretenses, promises, and representations, on February 11, 2018, **BAZZI** transmitted and caused the transmission by means of wire communication in interstate or foreign commerce, writings, signs, signals, pictures or sounds, in the form of an email communication from his email account, a starvalet@yahoo.com, in the State of Michigan through the Commonwealth of Virginia to E.P.'s AOL email account.

All in violation of Title 18, United States Code, Section 1343.

**COUNT THREE**

(18 U.S.C. § 1343 - Wire Fraud)

**D-1 HUSSEIN ADNAN BAZZI**

The general allegations are included in this count.

25. For the purpose of executing the scheme and to obtain money by means of false and fraudulent material pretenses, promises, and representations, on February 23, 2018, **BAZZI** transmitted and caused the transmission by means of wire communication in interstate or foreign commerce, writings, signs, signals, pictures or sounds, in the form of an email communication from his email account, a starvalet@yahoo.com, in the State of Michigan through the Commonwealth of Virginia to E.P.'s AOL email account.

All in violation of Title 18, United States Code, Section 1343.

**FORFEITURE ALLEGATION**

(18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c) – *Criminal Forfeiture*)

26. The general allegations and Count One of this Information are included to allege forfeiture under Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

27. Upon conviction of an offense in violation of Title 18, United States Code, Section 1343, the defendant shall forfeit to the United States of America, under Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the offense. The forfeiture in this case may include entry of a forfeiture money judgment in an amount up to the value of the property subject to forfeiture for the violations of conviction.

28. If, by any act or omission of the defendant, the proceeds of the offense cannot be located upon the exercise of due diligence, have been transferred, sold to, or deposited with a third party, have been placed beyond the jurisdiction of the court, have been substantially diminished in value, or have been commingled with other

property which cannot be divided without difficulty, the United States of America shall seek to forfeit substitute property under Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

All in violation of Title 18, United States Code, Section 1343.

**THIS IS A TRUE BILL.**

*s/Grand Jury Foreperson*  
GRAND JURY FOREPERSON

DAWN N. ISON  
United States Attorney

*s/John K. Neal*  
JOHN K. NEAL  
Chief, White Collar Crime Unit  
Assistant United States Attorney

*s/Karen L. Reynolds*  
KAREN L. REYNOLDS  
Assistant United States Attorney

Date: July 13, 2022



**(Companion Case information MUST be completed by AFSA)**

United States District Court  
Eastern District of Michigan

**Criminal Case Co**

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NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to com

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

**Case Title:** USA v. Hussein Adan Bazzi

**County where offense occurred :** Wayne/Oakland

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

- Indictment/ \_\_\_ Information --- **no** prior complaint.
- Indictment/ \_\_\_ Information --- based upon prior complaint [Case number: \_\_\_\_\_]
- 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><b>Defendant name</b></u>	<u><b>Charges</b></u>	<u><b>Prior Complaint (if applicable)</b></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.**

July 13, 2022  
Date

s/Karen L. Reynolds  
Karen L. Reynolds  
Assistant United States Attorney  
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Attorney Bar #:

<sup>1</sup> 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.