

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

Holding a Criminal Term

Grand Jury Sworn in on May 15, 2009

UNITED STATES OF AMERICA

v.

DAGMAWI TEFERA AMANUEL,
SURAPHEL AYALEW,
MEKWANINT ABEBE AYELE,
SOLOMON TAMEGN AYELA,
IYASU BAZEZEW,
DEREJE TAYE DEJENE,
AMBACHEW A. DEMSSIE,
BIRHANU SHOA GEBREGZIABHER,
DEREGE GEMECHU,
TURA BURKA GEMEDA,
ERMIAS ASFAW GETACHEW,
SALAHADIN ABUBEKER HAGOS,
BAHIRU GETACHEW HAILEGEBREAL,
TADESSE MAMO HAILEYESSUS,
OMAR H. HASSEN,
MICHAEL MOLLA HUNACHEW,
ISHAQ SANI HUSSEN,
OMAR M. HUSSEN,
ABUDAWOD ALI HUSSIEN,
NEBIL MUSTEFA ISMAEL,
GEORGE SEYOUM KEBEDE,
ABBA-YOHANNES DETAMO LAILAGO,
ASHENAFI TEFERA METAW,
FEYSAL JEMAL MOHAMED,
ISMAEL OMDURMAN,
ETANA ENGEDA SHUREMU,
YITBAREK SYUME,
YONAS TADESSE,
ESMAEL ABDULBASIT TAHIR,
ZELALEM ABABU TAREKEJN,
DULA TILAHUN,
FASIL REGASSA WAKJIRA,
DANIEL WOLDETENSAY,
YOHANNES GURMU WONDIMU,

CRIMINAL NO.

CR - 09 - 253

UNDER SEAL

VIOLATION:

18 U.S.C. § 371

(Conspiracy to Commit Bribery);

18 U.S.C. § 2

(Aiding and Abetting, Causing
an Act to be Done)

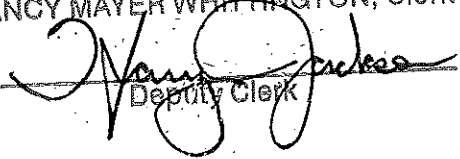
FILED IN OPEN COURT

OCT - 1 2009

CLERK, U.S. DISTRICT COURT
DISTRICT OF COLUMBIA

United States District Court
For the District of Columbia
A TRUE COPY
NANCY MAYER WHITTINGTON, Clerk

By



Deputy Clerk

FRIEDMAN, J. PLF

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Case Related To CR 09-226-(PLF)

- (b) the Chairperson had authority and influence over the issuance of individual District of Columbia taxicab operator licenses which, when issued, authorized individuals to operate taxicabs in the District of Columbia;
- (c) the Chairperson could recommend to the Council of the District of Columbia and others legislation affecting the taxicab industry in Washington, D.C.; and
- (d) the Chairperson could present positions to the Council of the District of Columbia and others in opposition to proposed legislation affecting the taxicab industry in Washington, D.C.

The Conspiracy

6. From between on or about September 3, 2009, until on or about September 28, 2009, the exact dates being unknown to the grand jury, in the District of Columbia and elsewhere, defendants **DAGMAWI TEFERA AMANUEL, SURAPHEL AYALEW, MEKWANINT ABEBE AYELE, SOLOMON TAMEGN AYELA, IYASU BAZEZEW, DEREJE TAYE DEJENE, AMBACHEW A. DEMSSIE, BIRHANU SHOA GEBREGZIABHER, DEREGE GEMECHU, TURA BURKA GEMEDA, ERMIAS ASFAW GETACHEW, SALAHADIN ABUBEKER HAGOS, BAHIRU GETACHEW HAILEGEBREAL, TADESSE MAMO HAILEYESSUS, OMAR H. HASSEN, MICHAEL MOLLA HUNACHEW, ISHAQ SANI HUSSEN, OMAR M. HUSSEN, ABUDAWOD ALI HUSSIEN, NEBIL MUSTEFA ISMAEL, GEORGE SEYOUM KEBEDE, ABBA-YOHANNES DETAMO LAILAGO, ASHENAFI TEFERA METAW, FEYSAL JEMAL MOHAMED, ISMAEL OMDURMAN, ETANA ENGEDA SHUREMU, YITBAREK SYUME, YONAS TADESSE, ESMAEL ABDULBASIT TAHIR, ZELALEM ABABU TAREKEJN, DULA TILAHUN, FASIL REGASSA WAKJIRA,**

DANIEL WOLDETENSAY, YOHANNES GURMU WONDIMU, ASHENAFI TESFAYE WORKU, ABEBAW NIGUSSIE YEHUALA, and AMEZENE A. ZEWDIE (the “**DEFENDANTS**”), and others known and unknown to the Grand Jury, knowingly and willfully conspired and agreed together and with each other, and with other persons both known and unknown to the grand jury, to commit the following offense against the United States: that is to directly and indirectly, corruptly give, offer, and promise things of value to the Chairperson, with intent to influence official acts, that is the **DEFENDANTS** agreed to give cash in various amounts to the Chairperson in return for his agreement to issue taxicab operator licenses to the **DEFENDANTS**, in violation of Title 18, United States Code, Section 201(b) (Bribery of a Public Official).

A Goal of the Conspiracy

7. It was a goal of the conspiracy to obtain corruptly and illegally licenses to operate taxicabs in the District of Columbia from the Chairperson in exchange for cash.

Manner and Means of the Conspiracy

8. The **DEFENDANTS** and other unindicted co-conspirators, both known and unknown to the Grand Jury, used the following manner and means among others to accomplish the object of the conspiracy:

- (a) It was part of the conspiracy that the **DEFENDANTS** would and did play different roles in the conspiracy, and took upon themselves different tasks and participated in the conduct of the organization through various criminal acts. The **DEFENDANTS** made themselves and their services available at various times throughout the life of the conspiracy and participated in activities required to obtain corruptly licenses to operate taxicabs in the District of Columbia. Some of the roles assumed and carried

out by **YITBAREK SYUME** and **SURAPHEL AYALEW** and other unindicted co-conspirators both known and unknown to the grand jury included, among others, recruiting and organizing co-conspirators who wanted to obtain corruptly taxicab operator licenses; collecting approximately \$110,000 in cash to be used for bribe payments to the Chairperson; and instructing co-conspirators as to when, where, and how cash payments should be made to the Chairperson.

- (b) It was further part of the conspiracy that **YITBAREK SYUME** and **SURAPHEL AYALEW** collected and forwarded to the Chairperson applications of co-conspirators who wanted to obtain corruptly taxicab operators licenses.
- (c) It was further part of the conspiracy that the **DEFENDANTS** met the Chairperson to provide fingerprints and photographs in conjunction with attempting to obtain corruptly taxicab operator licenses, at which time they also paid cash to the Chairperson for the operator licenses.

Overt Acts

9. In furtherance of the conspiracy and in order to achieve the goals thereof, the **DEFENDANTS** and others, known and unknown to the grand jury, within the District of Columbia, and elsewhere, committed overt acts, including, but not limited to the following:

- (1) On or about September 3, 2009, **YITBAREK SYUME** and **SURAPHEL AYALEW** met the Chairperson, at which time they discussed the method by which they would obtain corruptly taxicab operator licences, including the preparation of applications, the location for meetings, and the amount of the bribes to be paid to the Chairperson.
- (2) On or about September 11, 2009, **YITBAREK SYUME**, **SURAPHEL AYALEW**,

TADESSE MAMO HAILEYESSUS, ASHENAFI TEFERA METAW, MEKWANINT ABEBE AYELE, MICHAEL MOLLA HUNACHEW, ISHAQ SANI HUSSEN, ABBA-YOHANNES DETAMO LAILAGO, ABUDAWOD ALI HUSSIEN, ETANA ENGEDA SHUREMU, OMAR H. HASSEN, FASIL REGASSA WAKJIRA, ESMAEL ABDULBASIT TAHIR, DULA TILAHUN, TURA BURKA GEMEDA, YOHANNES GURMU WONDIMU, and IYASU BAZEZEW met the Chairperson, at which time they paid cash to him for taxicab operator licenses that they were attempting to obtain corruptly.

(3) On or about September 18, 2009, **YITBAREK SYUME** gave the Chairperson approximately \$51,000 in cash as partial payment for taxicab operator licenses that he and the other co-conspirators were attempting to obtain corruptly.

(4) On or about September 18, 2009, **YITBAREK SYUME, DEREGE GEMECHU, ERMIAS ASFAW GETACHEW, SALAHADIN ABUBEKER HAGOS, YONAS TADESSE, AMEZENE A. ZEWDIE, BIRHANU SHOA GEBREGZIABHER, DEREJE TAYE DEJENE, DAGMAWI TEFERA AMANUEL, ASHENAFI TESFAYE WORKU, OMAR M. HUSSEN, and GEORGE SEYOUM KEBEDE** met the Chairperson, at which time they paid cash to him for the taxicab operator licenses that they were attempting to obtain corruptly.

(5) On or about September 20, 2009, **YITBAREK SYUME, ISMAEL OMDURMAN, SOLOMON TAMEGN AYELA, DANIEL WOLDETENSAY, NEBIL MUSTEFA ISMAEL, FEYSAL JEMAL MOHAMED, AMBACHEW A. DEMSSIE, ABEBAW NIGUSSIE YEHUALA, BAHIRU GETACHEW HAILEGEBREAL, and ZELALEM ABABU TAREKEJN** met the Chairperson, at which time they paid him for taxicab operator licenses that they were attempting to obtain corruptly.

(6) On or about September 21, 2009, YITBAREK SYUME gave the Chairperson approximately \$40,000 in cash as partial payment for taxicab operator licenses that he and the other co-conspirators were attempting to obtain corruptly.

(7) On or about September 27, 2009, SURAPHEL AYALEW met the Chairperson at which time he discussed the logistics for the receipt of taxicab operator licenses by himself and the other co-conspirators.

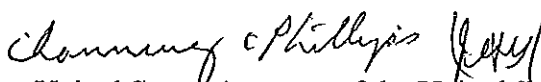
(8) On or about September 28, 2009, YITBAREK SYUME met the Chairperson at which time he discussed the logistics for the receipt of taxicab operator licences by himself and the other co-conspirators.

(Conspiracy to Commit Bribery, Aiding and Abetting, Causing an Act to be Done, in violation of Title 18, United States Code, Sections 371 and 2)

A TRUE BILL:



FOREPERSON


Acting United States Attorney of the United States
in and for the District of Columbia