ALW:IJ:LAL:SC:KAN
F.#2006R00740

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

- against -

JACOB ALEXANDER,
also known as
"Kobi Alexander,"

Defendant.

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S U P E R S E D I N G
I N D I C T M E N T

Cr. No. 06-628 (S-1) (NGG)
(T. 15, U.S.C., §§ 78j(b), 78m(a) and 78ff; T. 18, U.S.C., §§ 371, 981(a)(1)(C), 982, 1341, 1343, 1348, 1349, 1510(a), 1512(b)(1), 1956(a)(1)(B)(i), 1956(a)(2)(B)(i), 1957(a), 1957(b), 2 and 3551 et seq.; T. 21, U.S.C., § 853; T. 28, U.S.C., § 2461(c))

OCT 11 2006

THE GRAND JURY CHARGES:

INTRODUCTION TO ALL COUNTS

At all times relevant to this Superseding Indictment, unless otherwise indicated:

THE CORPORATION

1. Comverse Technology Inc. ("CTI") was a New York corporation with its headquarters in Woodbury, New York.[1] Beginning in 1986, CTI was a publicly-traded corporation, the common stock of which was traded on the NASDAQ National Market System ("NASDAQ"). Through Comverse Inc., a wholly-owned subsidiary, CTI was a provider of software and software systems

[1]In 2005, CTI moved its headquarters to Manhattan, but continued to maintain offices on Long Island.

for communication and billing services. CTI was a component stock in the S&P 500 and NASDAQ-100 indices. CTI's shareholders were located throughout the United States, including in the Eastern District of New York.

2. As a public company, CTI was required to comply with the rules and regulations of the United States Securities and Exchange Commission (the "SEC"). The SEC's rules and regulations were designed to protect members of the investing public by, among other things, ensuring that a company's financial information was accurately recorded and disclosed to the investing public. Under the SEC's rules and regulations, CTI and its officers were required to file with the SEC quarterly reports (on Form 10-Q) and annual reports (on Form 10-K) which included financial statements that accurately presented CTI's financial condition and the results of its business operations in accordance with Generally Accepted Accounting Principles ("GAAP"). CTI was also required to disseminate and file with the SEC annual proxy statements to shareholders (on Form 14-A) setting forth accurate information about matters to be brought to a vote at annual shareholder meetings.

THE DEFENDANT

3. The defendant ALEXANDER, a founder of CTI, was the Chief Executive Officer ("CEO") of CTI and Chairman of the Board

of Directors.[2] ALEXANDER reviewed and approved CTI's public filings. As CEO and Chairman, ALEXANDER signed CTI's annual and quarterly public filings. ALEXANDER received a bachelor's degree in economics from Hebrew University of Jerusalem, and a master's degree in finance from New York University. On May 1, 2006, ALEXANDER resigned his positions from CTI in the midst of an internal investigation by a Special Committee of CTI's Board of Directors (the "Special Committee").

4. The defendant ALEXANDER, together with others, engaged in a scheme to backdate millions of stock options granted to himself and CTI employees to days when the stock of CTI was trading at periodic low points. The defendant reaped substantial personal gain from his fraudulent conduct.

THE OPTIONS BACKDATING SCHEME

The Process of Granting Options

5. The defendant ALEXANDER, together with others, devised a scheme to defraud predicated on the backdating of CTI's option grants. An option is the right to buy a share of stock on a future date (typically at the end of a vesting period) at a set price, known as the "exercise" or "strike" price. The exercise price is ordinarily the trading price of the stock (i.e., the

[2]ALEXANDER was a director of CTI from its formation, and became Chairman in September 1986. ALEXANDER served as President of CTI from its formation until January 2001. In April 1987, ALEXANDER was named CEO.

fair market value) on the day that the option was granted by a corporation's board of directors or, typically, the board's compensation committee. The holder of an option makes a profit by exercising the option to buy the stock at the end of the vesting period at the locked-in exercise price, and selling the stock when it is trading at a higher price than the exercise price. Options with an exercise price equal to the current trading price of the underlying stock are commonly referred to as being "at the money"; options with an exercise price below the current trading price of the stock are "in the money"; and options with an exercise price above the current trading price of the stock are "under water." Options that are in the money have a so-called "paper profit" associated with them, meaning that the options have value based on the difference between the exercise price and the current trading price, although the holder has not yet reaped the actual profit by exercising the option and selling the stock, and may need to wait until the end of a vesting period to do so.

6. When a company grants in-the-money options, i.e., options with an exercise price below the current trading price, this event has significant accounting, disclosure and tax consequences as set forth below. One way for executives to reap the benefit of in-the-money-options while evading these accounting, disclosure and tax consequences is to backdate the

options so as to conceal the fact that the company has granted in-the-money options.

The Backdating of Options

7. Backdated options are options that appear to have been granted on a certain date at the fair market value (i.e., the trading price) of the underlying stock on the date of the grant, but were actually granted on a later date. One motive for backdating is to fix a lower exercise price for the options, thereby awarding in-the-money options and inflating the gain to the holder of the options. Backdated options, therefore, are typically backdated to a date on which the stock was trading at a lower price than the price on the day of the actual grant. By fixing an earlier date as a grant date, the company makes it appear that the options were granted at fair market value - the trading price of the stock on that earlier date. In this way, the holder of the option has received in-the-money options and therefore has a head start on the spread between the exercise price and the current trading price. One motive for backdating is to evade the accounting, disclosure, and tax consequences of granting in-the-money options.

Accounting Consequences

8. The granting of in-the-money options has significant accounting consequences. Essentially, in-the-money options constitute compensation and therefore should be

"expensed" (i.e., deducted from revenue as a compensation expense). Specifically, during the relevant period, CTI followed Accounting Principles Board Opinion No. 25, Accounting for Stock Issued to Employees ("APB 25"), which provides that a company need not expense options granted at the money. This means that CTI was not required to deduct from revenue any compensation expense for granting options priced at the money on the date of the grant. However, under APB 25, CTI was required to expense any options granted with an exercise price *less* than the fair market value of the underlying shares on the date of the grant (i.e., in-the-money options). Backdating options would violate this accounting rule if CTI did not expense the in-the-money option grants over the vesting period, and would cause CTI to overstate its profits.

Shareholder Impact and Disclosure Issues

9. The granting of in-the-money options has significant consequences for shareholders and therefore must be disclosed in the company's filings. CTI acknowledged in its proxy statements that it was required to obtain shareholder approval of its stock option plans in order to meet certain tax requirements and for NASDAQ approval of the trading of the stock to be used for incentive stock options. During the years at issue, CTI's stock option plans, as described in and attached to CTI's proxy statements and approved by

shareholders, required that incentive stock options, which qualify for certain beneficial tax treatment, be priced at the money or higher. Backdating options to an earlier date when the stock was trading at a lower price would violate the terms of the plans in that respect. Although the plans did allow CTI to grant in-the-money "nonqualified options" (i.e., options that were not eligible to receive the beneficial tax treatment), CTI repeatedly represented to the public that all stock options (incentive and nonqualified) were in fact granted with an exercise price equal to the fair market value of the underlying shares on the purported date of the grant.

Tax Consequences Regarding Grants to Highly-Paid Executives

10. The backdating of stock options affects whether a company can deduct the options as executive compensation. Specifically, the Internal Revenue Code ("I.R.C."), Section 162(m), generally limits the deductibility of certain executive compensation to one million dollars per executive per year. An exception is made for certain performance-based compensation, including stock options granted at the money. In its proxy statements and other public filings, as set forth in detail below, CTI falsely represented that all stock options intended to qualify as performance-based compensation under I.R.C. Section 162(m) were granted at the money. The award of in-the-money options, due to backdating, could lead a company to

violate Section 162(m) and file false tax returns by deducting improperly valued options as executive compensation expense.

BACKDATING COMPANY-WIDE GRANTS

11. The defendant ALEXANDER, together with others, engaged in a scheme to backdate millions of stock options to themselves and their employees to days when the stock of CTI was trading at periodic low points. Between 1998 and 2001, the defendant, together with others, backdated every company-wide grant and certain grants of options to new employees. As the top recipient of stock options in every company-wide grant, the defendant ALEXANDER reaped substantial personal gain from his fraudulent conduct.

The 1998 Company-Wide Grant

12. For the year 1998, the defendant ALEXANDER, together with others, caused CTI to issue a company-wide option grant dated "as of" October 9, 1998. However, as the defendant well knew, the grant did not occur on that date, but instead occurred on about October 15, 1998. On October 9, 1998, the backdated day selected for the grant, CTI's stock price was $30, the second lowest price of any day in 1998; on October 15, it was $36.50, and generally continued to climb thereafter. Thus, the options were in the money by at least $6.50 per share. The total number of options granted was approximately 744,000, with 250,000 awarded to ALEXANDER (paper profit of

$1.625 million).

The 1999 Company-Wide Grant

13. For the year 1999, the defendant ALEXANDER, together with others, caused CTI to issue a company-wide option grant dated "as of" October 18, 1999. However, as the defendant well knew, the grant did not occur on that date, but instead occurred on or about November 24, 1999. On October 18, 1999, the backdated day selected for the grant, CTI's stock was trading at $93, the lowest price since the last shareholder meeting of October 9, 1999, when the shareholders approved the 1999 stock option plan. On November 24, 1999, CTI stock was trading at $128.813 and trending upward; thus, the options were in the money by at least $35.813 per share. The total number of options granted company-wide was over 3.83 million; ALEXANDER was awarded 315,000 (paper profit of over $11 million).

The 2000 Company-Wide Grant

14. For the year 2000, the defendant ALEXANDER, together with others, caused CTI to issue a company-wide option grant dated "as of" November 30, 2000, but which instead occurred no earlier than December 13, 2000. On November 30, 2000, the backdated day selected for the grant, CTI stock was trading at $86.19, its lowest point since the company's annual meeting on September 14, 2000, when the shareholders approved

CTI's 2000 stock option plan. The stock price on December 13, 2000, was $112.125, or about $26 above the November 30, 2000 trading price. The total number of options awarded was over 8.7 million, with 600,000 awarded to ALEXANDER. Over 3,000 employees received options in this grant.

The 2001 Company-Wide Grant

15. For the year 2001, the defendant ALEXANDER, together with others, caused CTI to issue a company-wide option grant dated "as of" October 22, 2001. However, as the defendant knew, the grant did not occur on that date, but instead occurred on or about November 28, 2001. CTI's closing stock price on the backdated day of October 22, 2001 was $16.05, the second lowest price of the year in 2001; the price on November 28, 2001, was $21.01, and generally continued to rise. Thus, the options were granted in the money by nearly $5 or more per share. The total number of options granted was more than 9.4 million, with 600,000 awarded to ALEXANDER (paper profit of $3 million).

BACKDATING FOR NEW HIRES

16. The defendant ALEXANDER, together with others, arranged to reward new employees with in-the-money options backdated to days before the new employees were employed by CTI. This was improper for three reasons. First, the defendant did not disclose or cause to be disclosed to the

shareholders that in-the-money grants had been awarded. Second, the defendant did not account for these in-the-money options or cause the in-the-money options to be accounted for correctly. Third, CTI's option plans in effect at the time did not allow the granting of options to non-employees (other than directors). Because the grants were made effective before the new employees joined the company, the grants were awarded to persons who were, as of the backdated date, non-employees of the company, in violation of the shareholder-approved stock option plans.

THE PHANTOM/FARGO SLUSH FUND

17. The defendant ALEXANDER, together with others, used fictitious names to generate hundreds of thousands of backdated options, which the conspirators then parked in a secret slush fund designed to evade the requirements of CTI's stock option plans. ALEXANDER unilaterally awarded options from this slush fund to favored employees, and caused documents to be falsified in order (a) to hide the slush fund from members of the Board of Directors of CTI and from CTI's outside auditor, and (b) to conceal any accounting for the slush fund in CTI's public filings. The defendant and his conspirators called the slush fund "I.M. Fanton," a name inspired by the Broadway show "Phantom of the Opera." Subsequently, the defendant and his conspirators renamed the slush fund "Fargo,"

inspired by the movie of the same name.

18. In or about 1999, the defendant ALEXANDER directed the creation and insertion of dozens of fictitious employee names into proposed grantee lists sent to members of the Board of Directors of CTI charged with approving option grants to employees. ALEXANDER further directed that the fictitious employees each receive a grant of 5,000 options. After the designated members of the Board of Directors of CTI approved the grantee list, the defendant ALEXANDER, together with others, directed the transfer of these option grants to "phantom" employees, aggregating at least 200,000, into the Phantom/Fargo slush fund.

19. In or about 2000, the defendant ALEXANDER, together with others, caused an additional lump sum of over 200,000 options to be deposited into the Phantom/Fargo slush fund, and caused acts of concealment to hide this transfer of options to the slush fund from members of the Board of Directors of CTI and from CTI's outside auditor.

20. In or about 2001, the defendant ALEXANDER, together with others, caused the creation and insertion into the proposed grantee list, of approximately twenty-five fictitious employees to be awarded approximately 10,000 options each. After designated members of the Board of Directors of CTI approved the grantee list, the defendant ALEXANDER,

together with others, directed the transfer of these "phantom" option grants, aggregating at least 250,000, into the Phantom/Fargo slush fund.

21. The defendant ALEXANDER, together with others, on several occasions, directed the transfer of options from the Phantom/Fargo slush fund to favored executives and employees of CTI. The defendant ALEXANDER further caused some of the Phantom/Fargo options to become immediately exercisable, in contravention of the shareholder-approved stock-option plans, resulting in immediate cash gains to the slush fund recipients totaling several million dollars.

FALSE AND MISLEADING STATEMENTS IN CTI'S PUBLIC FILINGS

22. The defendant ALEXANDER, together with others, knowingly and intentionally made false statements, misrepresentations, and material omissions in CTI's proxy statements, annual and quarterly filings, and stock option plans.

23. The proxy statements, stock option plans, and annual filings were sent to CTI's shareholders by United States mail. The annual and quarterly filings of CTI and the proxy statements sent to shareholders were filed electronically with the SEC in Washington, D.C.

The 1999 Proxy Statement and 1999 Stock Option Plan

24. On September 7, 1999, CTI filed a proxy statement for an annual shareholder meeting to be held on October 8, 1999 in Melville, New York. The matters to be brought to a vote included: (a) amending the certificate of incorporation to increase from 100 million to 300 million the aggregate number of authorized shares of CTI's common stock, and (b) adopting CTI's 1999 Stock Incentive Compensation Plan (the "1999 Plan"), which the Board of Directors had approved and recommended to shareholders.

25. Underneath a table disclosing option grants to CTI executives during the prior fiscal year, as the defendant ALEXANDER well knew and believed, the proxy statement falsely stated: "The exercise price of the options is equal to the fair market value of the underlying shares at the date of grant." This statement was false and misleading because the defendant ALEXANDER, together with others, had backdated the options to earlier dates when the stock was trading at a lower price.

26. At the annual meeting on October 8, 1999, the shareholders approved the 1999 Plan. As set forth above, with this new Plan in hand, in November 1999, the defendant ALEXANDER, together with others, issued a company-wide grant backdated to October 18, 1999, and launched the fraudulent Phantom/Fargo scheme.

The 2000 Proxy Statement and 2000 Stock Option Plan

27. On July 20, 2000, CTI filed a preliminary proxy statement regarding matters to be brought to a vote at the annual shareholder meeting to be held in Melville, New York, on September 15, 2000.[3] The matters to be brought to a vote included: (a) amending the certificate of incorporation to increase the number of authorized shares from 300 million to 600 million; and (b) adopting the 2000 Stock Incentive Compensation Plan (the "2000 Plan"), under which up to nine million shares would be newly available for the issuance of options.

28. As the defendant ALEXANDER well knew and believed, the 2000 proxy statement falsely stated that incentive stock options and any options designated as an I.R.C. Section 162(m) award under the 2000 Plan would be issued at fair market value of the stock "on the grant date." Underneath a table disclosing option grants to CTI executives during the prior fiscal year, as the defendant well knew and believed, the 2000 proxy statement falsely represented: "The exercise price of the options is equal to the fair market value of the underlying shares at the date of grant."

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[3]The final proxy statement was filed May 11, 2001, and contained the same representations as the preliminary statement.

29. At the annual meeting, the shareholders approved the 2000 Plan. As set forth above, the defendant, together with others, then backdated a company-wide grant with a false date of November 30, 2000 and continued the Phantom/Fargo slush fund scheme.

The 2001 Proxy Statement and 2001 Stock Option Plan

30. On May 11, 2001, CTI filed a proxy statement regarding matters to be brought to a vote at the annual shareholder meeting to be held in Melville, New York, on June 15, 2001. The matters to be brought to a vote included adopting the 2001 Stock Incentive Compensation Plan (the "2001 Plan"), under which 9.7 million shares would be newly available for the issuance of options.

31. As in prior years, and as the defendant ALEXANDER well knew and believed, the 2001 proxy statement falsely stated that incentive stock options and any options designated as an I.R.C. Section 162(m) award under the 2001 Plan would be issued at fair market value of the stock "on the grant date." In addition, underneath a table disclosing option grants to CTI executives during the prior fiscal year, as the defendant ALEXANDER well knew and believed, the proxy statement falsely stated: "The exercise price of the options is equal to the fair market value of the underlying shares at the date of grant."

32. At the annual meeting, the shareholders approved the 2001 Plan. As set forth above, the defendant ALEXANDER, together with others, subsequently backdated a company-wide grant with a false date of October 22, 2001.

Special 2001 Proxy Statement and Repricing of Options

33. The defendant ALEXANDER, together with others, won shareholder approval of a stock option repricing plan based on false statements, misrepresentations, and material omissions to the shareholders.

34. On December 13, 2001, CTI filed a proxy statement for a special shareholder meeting to be held in Melville, New York on January 29, 2002. The purpose of the meeting was to approve the repricing of underwater options (i.e., options whose exercise price was greater than the current trading price of the stock). If approved, the options would be reissued and repriced at the fair market value of the stock no earlier than six months and one day following cancellation of the existing options.

35. In this proxy statement, as the defendant ALEXANDER well knew and believed, CTI falsely stated: "Options granted by the Company under the Company's stock incentive compensation plans have exercise prices not less than market price of the Company's Common Stock as reported on the NASDAQ National Market System as of the respective dates of grant."

Under a table disclosing options granted in the prior fiscal year (ending January 31, 2001), as the defendant ALEXANDER well knew and believed, the proxy statement, referring to the options in the table, falsely represented: "The exercise price of the options is equal to the fair market value of the underlying shares at the date of grant." These statements were false and misleading because the options had been backdated to dates when the stock was trading at a lower price. The proxy statement represented: "The Exchange Offer is intended to realign the exercise price of previously granted options with the current trading price of the Company's Common Stock and thereby better enable the Company to motivate and retain its employees and achieve the Company's business goals." This statement was false and misleading because the defendant, together with others, failed to disclose that the starting point (i.e., the exercise price) of the underwater options was below the fair market value of the underlying stock at the time of the grant.

36. At the special shareholder meeting, the shareholders approved the repricing plan. Backdated underwater options were cancelled on June 20, 2002, and, according to a formula specified in the plan, were reissued and repriced on December 23, 2002.

Annual and Quarterly Reports

37. It was a further part of the conspiracy that the defendant ALEXANDER, together with others, caused false and misleading statements, misrepresentations, and material omissions in the annual and quarterly reports that CTI filed with the SEC.

38. On April 30, 2002, CTI filed its annual report on Form 10-K, covering the fiscal year ended January 31, 2002. On May 29, 2002, CTI filed its amended annual report on Form 10-K/A, covering the same fiscal year. The financial statements in these reports were false and misleading, as the defendant ALEXANDER well knew and believed, because the defendant, together with others, had caused CTI to fail to expense the backdated, in-the-money options. The financial statements contained the following footnote in relevant part with respect to options:

> The Company applies Accounting Principles Board Opinion No. 25, "Accounting for Stock Issued to Employees," and related interpretations in accounting for its option plans. Accordingly, as all options have been granted at exercise prices equal to fair market value on the date of grant, no compensation expense has been recognized by the Company in connection with its stock-based compensation plans.

Because the defendant ALEXANDER had caused CTI to issue backdated options during calendar year 2001, the defendant well knew and believed that these statements were false. CTI's

annual reports for fiscal years ending January 31, 1999, January 31, 2000, and January 31, 2001, filed on April 26, 1999, May 1, 2000, and April 30, 2001, respectively, contained similar statements which the defendant knew to be false. The defendant ALEXANDER signed all the false annual reports.

39. On April 30, 2003, CTI filed its annual report on Form 10-K, covering the fiscal year ended January 31, 2003. On May 30, 2003, CTI filed its amended annual report on Form 10-K/A, covering the same fiscal year. The financial statements in the Forms 10-K and 10-K/A included financial statements from, among other years, 1999, 2000, 2001, and 2002. These financial statements were false and misleading, as the defendant ALEXANDER well knew and believed, because the defendant, together with others, had caused CTI to fail to expense the backdated, in-the-money options in 1998, 1999, 2000, and 2001.

40. On April 14, 2004, CTI filed its annual report on Form 10-K, covering the fiscal year ended January 31, 2004. The financial statements in the Form 10-K included financial statements from, among other years, 2000, 2001 and 2002. These financial statements were false and misleading, as the defendant ALEXANDER well knew and believed, because the defendant, together with others, had caused CTI to fail to expense the backdated, in-the-money options in 1999, 2000, and

2001.

41. In addition, during the years of the conspiracy, the defendant ALEXANDER, together with others, caused CTI to issue quarterly filings containing financial statements which the defendant well knew and believed to be false, because the defendant knew that CTI had failed to expense backdated options granted with an exercise price at less than the fair market value of the stock on the date of the grant. These false quarterly filings included CTI's quarterly report for the period ending October 31, 2001, filed on December 14, 2001. The defendant ALEXANDER signed all the false quarterly reports.

FALSE AND MISLEADING STATEMENTS TO INSTITUTIONAL INVESTORS

42. The defendant ALEXANDER, together with others, made false and misleading statements, misrepresentations, and omissions to CTI's institutional investors, which owned a substantial percentage of CTI stock.

43. As the defendant ALEXANDER knew, certain of these institutional investors were opposed to in-the-money options grants, and expressly demanded, in exchange for an affirmative proxy vote sought by CTI, that CTI make a commitment that it would not issue in-the-money options. Aware of these institutional investor concerns, the defendant ALEXANDER caused CTI employees to falsely represent to the institutional investors that CTI would not issue any options

with an exercise price below the fair market value of the underlying stock on the date of the grant.

OBSTRUCTION OF JUSTICE

44. On or about March 11, 2006, ALEXANDER offered another person millions of dollars as a bribe, for the purpose of inducing that other person to falsely take sole responsibility for the fraud scheme. In particular, ALEXANDER first offered $2 million, then offered $5 million, and then stated, in substance, "name your price." ALEXANDER repeated this offer, in substance, several days later. ALEXANDER added, in substance, there was no reason that both of them "should go down."

LAUNDERING THE PROCEEDS OF THE BACKDATING SCHEME

45. The defendant ALEXANDER conducted a series of financial transactions with the proceeds he derived from backdated CTI options that he exercised and sold.

46. In or about and between 1998 and 2006, the defendant ALEXANDER deposited shares obtained through the exercise of backdated CTI options into Citigroup/Smith Barney Account No. 600-003338 (the "338 Account"). ALEXANDER later sold these shares, and wired the proceeds to other accounts, or used the proceeds to make other investments. Most, if not all, of the financial transactions conducted with the proceeds of the sales of stock obtained using backdated CTI options were in

amounts in excess of $10,000.

47. The defendant ALEXANDER also maintained Citigroup/Smith Barney Account No. 600-27694 (the "694 Account"). ALEXANDER funded the 694 Account with monies from the 338 Account, and he routinely transferred several hundred thousand dollars, and millions of dollars, between the two accounts. For example, in or about January 2006, ALEXANDER transferred $800,000 from the 694 Account to the 338 Account and back again. Through these transfers, the defendant ALEXANDER commingled the proceeds obtained through the exercise of backdated CTI options with other funds.

48. On or about July 25, 2006, knowing that he was under investigation in connection with the options backdating scheme, the defendant ALEXANDER transferred approximately $7,000,000 from the 694 Account into the 338 Account.

49. In or about July 2006, knowing that he was under investigation in connection with the options backdating scheme, the defendant ALEXANDER transferred over $57,000,000 from the 338 Account to two banks in Israel, including approximately $7,000,000 from the 694 Account. ALEXANDER conducted these transfers with the intent to conceal the tainted funds from law enforcement.

COUNT ONE
(Conspiracy to Commit Securities Fraud, Mail Fraud, and Wire Fraud)

50. The allegations contained in paragraphs 1 through 49 are realleged and incorporated as if fully set forth in this paragraph.

51. In or about and between January 1998 and March 2006, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant JACOB ALEXANDER, also known as "Kobi Alexander," together with others, did knowingly, willfully, and intentionally conspire to (1) use and employ manipulative and deceptive devices and contrivances directly and indirectly, by use of means and instrumentalities of interstate commerce and the mails, in contravention of Rule 10b-5 of the Rules and Regulations of the United States Securities and Exchange Commission (Title 17, Code of Federal Regulations, Section 240.10b-5), and directly and indirectly to (a) employ devices, schemes and artifices to defraud; (b) make untrue statements of material fact and omit to state material facts necessary in order to make the statements made, in light of the circumstances under which they were made, not misleading; and (c) engage in acts, practices and a course of business which would and did operate as a fraud and deceit upon CTI, its shareholders, and members of the investing public, in connection with purchases and sales of the

securities of CTI, in violation of Title 15, United States Code, Sections 78j(b) and 78ff; and (2) devise a scheme and artifice to defraud CTI, its shareholders, and members of the investing public, and to obtain money and property from CTI, its shareholders, and members of the investing public by means of materially false and fraudulent pretenses, representations and promises, and for the purpose of executing such scheme and artifice, and attempting to do so, (a) to cause mail matter to be delivered by the United States Postal Service and commercial foreign and interstate carriers according to the directions thereon, in violation of Title 18, United States Code, Section 1341, and (b) to transmit and cause to be transmitted, by means of wire communication in interstate and foreign commerce, writings, signs, signals, pictures and sounds, in violation of Title 18, United States Code, Section 1343.

52. In furtherance of the conspiracy, and to effect its objectives, within the Eastern District of New York and elsewhere, the defendant JACOB ALEXANDER, also known as "Kobi Alexander," and his coconspirators committed and caused to be committed the following:

OVERT ACTS

a. On or about October 15, 1998, the defendant ALEXANDER caused a Comverse employee to transmit, by fax and commercial foreign and interstate carriers, to designated

members of the CTI Board of Directors, Unanimous Written Consent Forms backdated "as of" October 9, 1998.

b. In or about October 1999, the defendant ALEXANDER caused the creation of the Phantom/Fargo options slush fund.

c. In or about October 1999, the defendant ALEXANDER caused a Comverse employee to create names of fictitious employees to be inserted into the proposed options grant list for consideration and approval by designated members of the Board of Directors of CTI.

d. On or about April 26, 1999, the defendant ALEXANDER signed CTI's Form 10-K, for fiscal year ended January 31, 1999, and caused it to be filed by wire with the SEC.

e. On or about November 24, 1999, the defendant ALEXANDER caused a Comverse employee to transmit, by fax and commercial foreign and interstate carriers, to designated members of the CTI Board of Directors, Unanimous Written Consent Forms backdated "as of" October 18, 1999.

f. On or about May 1, 2000, the defendant ALEXANDER signed CTI's Form 10-K, for fiscal year ended January 31, 2000, and caused it to be filed by wire with the SEC.

g. In or about August 2000, the defendant ALEXANDER caused the transfer of approximately 48,000 options to an employee from the Phantom/Fargo options slush fund, and made the options immediately exercisable. The employee immediately

exercised the options and sold the stock for an instant profit of approximately $2 million.

h. On or about September 5, 2000, the defendant ALEXANDER caused a Comverse employee to backdate an options grant for a newly-hired employee to August 11, 2000, notwithstanding the fact that the newly-hired employee was not scheduled to begin, and did not begin, his/her employment with Comverse until September 17, 2000.

i. In or about December 2000, the defendant ALEXANDER caused the transfer of approximately 40,000 options to an employee from the Phantom/Fargo options slush fund, and made the options immediately exercisable. The employee immediately exercised the options and sold the stock for an instant profit of approximately $2 million.

j. On or about March 2, 2001, the defendant ALEXANDER caused a Comverse employee to transmit, by fax and commercial foreign and interstate carriers, to designated members of the CTI Board of Directors, Unanimous Written Consent Forms backdated "as of" November 30, 2000.

k. On or about April 30, 2001, the defendant ALEXANDER signed CTI's Form 10-K, for fiscal year ended January 31, 2001, and caused it to be filed by wire with the SEC.

l. In or about June 2001, the defendant ALEXANDER caused CTI employees to make false and misleading

representations, by e-mail, telephone, and letter, to institutional investors, namely, that CTI would not, without the institutional investors' approval, grant any stock options under the 2001 stock option plan having an exercise price below the fair market value of the underlying shares on the date of the grant.

m. In or about November 2001, the defendant ALEXANDER caused a Comverse employee to create names of fictitious employees to be inserted into the proposed options grant list for consideration by designated members of the Board of Directors of CTI.

n. On or about November 28, 2001, the defendant ALEXANDER caused a Comverse employee to transmit, by fax and commercial foreign and interstate carrier, to members of the CTI Board of Directors, Unanimous Written Consent Forms backdated "as of" October 22, 2001.

o. On or about January 16, 2002, the defendant ALEXANDER caused CTI's Proxy Statement, Soliciting Shareholder Approval for the 2002 Stock Option Plan, to be delivered by the United States Postal Service to shareholders of CTI common stock in Brooklyn, Queens, and Staten Island, New York.

p. On or about April 30, 2002, the defendant ALEXANDER signed CTI's Form 10-K, for fiscal year ended January 31, 2002, and caused it to be filed by wire with the SEC.

q. On or about December 23, 2002, the defendant ALEXANDER received nearly 2,000,000 repriced (previously under-water) CTI options.

r. On or about May 29, 2002, the defendant ALEXANDER signed CTI's Form 10-K/A, for fiscal year ended January 31, 2002, and caused it to be filed by wire with the SEC.

s. On or about April 30, 2003, the defendant ALEXANDER signed CTI's Form 10-K, for fiscal year ended January 31, 2003, and caused it to be filed by wire with the SEC.

t. On or about May 30, 2003, the defendant ALEXANDER signed CTI's Form 10-K/A, for fiscal year ended January 31, 2003, and caused it to be filed by wire with the SEC.

u. On or about April 14, 2004, the defendant ALEXANDER signed CTI's Form 10-K, for fiscal year ended January 31, 2004, and caused it to be filed by wire with the SEC.

v. On or about April 8, 2005, the defendant ALEXANDER exercised 22,500 options that had been repriced on December 23, 2002, for a net gain of approximately $333,939.

w. On or about April 11, 2005, the defendant ALEXANDER exercised 2,500 options that had been repriced on December 23, 2002, for a net gain of approximately $36,450.

x. On or about April 12, 2005, the defendant ALEXANDER exercised 25,000 options that had been repriced on December 23, 2002, for a net gain of approximately $364,800.

y. On or about January 5, 2006, the defendant ALEXANDER exercised 7,500 options that had been repriced on December 23, 2002, for a net gain of approximately $123,975.

z. On or about January 6, 2006, the defendant ALEXANDER exercised 218,000 options that had been repriced on December 23, 2002, for a net gain of approximately $3,632,665.

aa. On or about January 9, 2006, the defendant ALEXANDER exercised 49,000 options that had been repriced on December 23, 2002, for a net gain of approximately $811,386.

bb. On or about and between March 3, 2006 and March 5, 2006, the defendant ALEXANDER, in response to questions from the CTI lawyer regarding CTI options grants, stated, in substance, that "we" picked "good days" for company-wide option grants by acting quickly upon noticing a "dip" in the CTI stock price.

(Title 18, United States Code, Sections 371 and 3551 et seq.)

COUNT TWO
(Securities Fraud)

53. The allegations contained in paragraphs 1 through 49 are realleged and incorporated as if fully set forth in this paragraph.

54. In or about and between January 1998 and March 2006, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant JACOB

ALEXANDER, also known as "Kobi Alexander," together with others, did knowingly and willfully, directly and indirectly, use and employ manipulative and deceptive devices and contrivances in violation of Rule 10b-5 of the Rules and Regulations of the SEC (Title 17, Code of Federal Regulations, Section 240.10b-5), in that the defendant, together with others, did knowingly and willfully, directly and indirectly, (1) employ devices, schemes, and artifices to defraud; (2) make untrue statements of material fact and omit to state material facts necessary in order to make statements made, in light of the circumstances under which they were made, not misleading; and (3) engage in acts, practices, and courses of business which would and did operate as a fraud and deceit upon CTI, its shareholders, and members of the investing public, in connection with purchases and sales of the securities of CTI, and by use of interstate commerce and the mails.

(Title 15, United States Code, Sections 78j(b) and 78ff; Title 18, United States Code, Sections 2 and 3551 et seq.)

COUNTS THREE THROUGH TEN
(False SEC Filings)

55. The allegations contained in paragraphs 1 through 49 are realleged and incorporated as if fully set forth in this paragraph.

56. On or about the dates listed below, within the Eastern District of New York and elsewhere, the defendant JACOB ALEXANDER, also known as "Kobi Alexander," together with others, did unlawfully, willfully, and knowingly, make and cause to be made statements in reports and documents required to be filed with the SEC under the Securities Exchange Act of 1934 and the rules and regulations promulgated thereunder, which statements were false and misleading with respect to material facts, to wit: the filings listed below:

COUNT	**FILING**	**APPROXIMATE DATE OF FILING**
THREE	Preliminary Proxy Statement Soliciting Shareholder Approval for 2002 Stock Option Repricing Plan	December 13, 2001
FOUR	Form 10Q for CTI for quarter ended October 31, 2001	December 14, 2001
FIVE	Proxy Statement Soliciting Shareholder Approval for 2002 Stock Option Plan	January 16, 2002
SIX	Form 10-K for CTI for fiscal year ended January 31, 2002	April 30, 2002
SEVEN	Form 10-K/A for CTI for fiscal year ended January 31, 2002	May 29, 2002
EIGHT	Form 10-K for CTI for fiscal year ended January 31, 2003	April 30, 2003
NINE	Form 10-K/A for CTI for fiscal year ended January 31, 2003	May 30, 2003
TEN	Form 10-K for CTI for fiscal year ended January 31, 2004	April 14, 2004

(Title 15, United States Code, Sections 78m(a) and 78ff; Title 18, United States Code, Sections 2 and 3551 et seq.)

COUNT ELEVEN
(Conspiracy to Commit Securities Fraud)

57. The allegations contained in paragraphs 1 through 49 are realleged and incorporated as if fully set forth in this paragraph.

58. On or about and between July 30, 2002 and March 2006, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant JACOB ALEXANDER, also known as "Kobi Alexander," together with others, did knowingly and intentionally conspire to execute a scheme and artifice (a) to defraud CTI, its shareholders, and members of the investing public in connection with securities of an issuer with a class of securities that was registered under Section 12 of the Securities Exchange Act of 1934, to wit: the common stock of CTI, and (b) to obtain, by means of materially false and fraudulent pretenses, representations and promises, money and property in connection with the purchase and sale of securities of an issuer with a class of securities that was registered under Section 12 of the Securities Exchange Act of 1934, to wit: the common stock of CTI.

(Title 18, United States Code, Sections 1349 and 3551 et seq.)

COUNT TWELVE
(Securities Fraud)

59. The allegations contained in paragraphs 1 through 49 are realleged and incorporated as if fully set forth in this paragraph.

60. On or about and between July 30, 2002 and March 2006, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant JACOB ALEXANDER, also known as "Kobi Alexander," together with others, did knowingly and intentionally execute a scheme and artifice (a) to defraud CTI, its shareholders, and members of the investing public in connection with securities of an issuer with a class of securities that was registered under Section 12 of the Securities Exchange Act of 1934, to wit: the common stock of CTI, and (b) to obtain, by means of materially false and fraudulent pretenses, representations and promises, money and property in connection with the purchase and sale of securities of an issuer with a class of securities that was registered under Section 12 of the Securities Exchange Act of 1934, to wit: the common stock of CTI.

(Title 18, United States Code, Sections 1348, 2 and 3551 et seq.)

COUNTS THIRTEEN THROUGH FIFTEEN
(Mail Fraud)

61. The allegations contained in paragraphs 1 through 49 are realleged and incorporated as if fully set forth in this paragraph.

62. In or about and between January 1998 and March 2006, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant JACOB ALEXANDER, also known as "Kobi Alexander," together with others, did knowingly and intentionally devise a scheme and artifice to defraud CTI, its shareholders, and members of the investing public, and to obtain money and property from the CTI, its shareholders, and members of the investing public, by means of materially false and fraudulent pretenses, representations and promises.

63. For the purpose of executing this scheme and artifice, and attempting to do so, on or about November 28, 2001, the defendant ALEXANDER, together with others, did cause mail matter, to wit: Unanimous Written Consent forms and cover letters, to be sent from 170 Crossways Park Drive, Woodbury, New York, by commercial foreign and interstate carriers, to the members of the Board of Directors of CTI as set forth below:

COUNT	DIRECTOR AND ADDRESS OF RECEIPT OF MAIL MATTER
THIRTEEN	Sam Oolie Oolie Enterprises c/o No Fire Technologies, Inc. 21 Industrial Avenue Upper Saddle River, New Jersey 07458
FOURTEEN	John H. Friedman Easton Capital Corp. 641 Lexington Avenue New York, New York 10022
FIFTEEN	Ron Hiram 8 Balvy Street, Apt. 13 Tel Aviv 62331 Israel

(Title 18, United States Code, Sections 1341, 2 and 3551 et seq.)

COUNT SIXTEEN
(Mail Fraud)

64. The allegations contained in paragraphs 1 through 49 are realleged and incorporated as if fully set forth in this paragraph.

65. In or about and between January 1998 and March 2006, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant JACOB ALEXANDER, also known as "Kobi Alexander," together with others, did knowingly and intentionally devise a scheme and artifice to defraud CTI, its shareholders, and members of the investing public, and to obtain money and property from CTI, its shareholders, and members of the investing public, by means

of materially false and fraudulent pretenses, representations and promises.

66. For the purpose of executing this scheme and artifice, and attempting to do so, on or about January 16, 2002, the defendant ALEXANDER, together with others, did cause mail matter, to wit: a Proxy Statement Soliciting Shareholder Approval for the 2002 Stock Option Plan, to be delivered by the United States Postal Service to shareholders of CTI common stock in Brooklyn, Queens, and Staten Island, New York.

(Title 18, United States Code, Sections 1341, 2 and 3551 et seq.)

COUNT SEVENTEEN THROUGH THIRTY
(Wire Fraud)

67. The allegations contained in paragraphs 1 through 49 are realleged and incorporated as if fully set forth in this paragraph.

68. In or about and between January 1998 and March 2006, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant JACOB ALEXANDER, also known as "Kobi Alexander," together with others, did knowingly and intentionally devise a scheme and artifice to defraud CTI, its shareholders, and members of the investing public, and to obtain money and property from CTI, its shareholders, and members of the investing public, by means of materially false and fraudulent pretenses, representations

and promises.

69. For the purpose of executing this scheme and artifice, and attempting to do so, on or about the dates set forth below, the defendant ALEXANDER, together with others, did transmit and cause to be transmitted by means of wire communication in interstate and foreign commerce, writings, signs, signals, pictures and sounds, as set forth below:

COUNT	WIRE COMMUNICATION	APPROXIMATE DATE
SEVENTEEN	Fax transmission of cover letter and Unanimous Written Consent form from CTI in Woodbury, New York to Sam Oolie in Upper Saddle River, New Jersey	November 28, 2001
EIGHTEEN	Fax transmission of cover letter and Unanimous Written Consent form from CTI in Woodbury, New York to John Friedman, in New York, New York	November 28, 2001
NINETEEN	Fax transmission of cover letter and Unanimous Written Consent form from CTI in Woodbury, New York to Ron Hiram in Tel Aviv, Israel	November 28, 2001
TWENTY	Preliminary Proxy Statement Soliciting Shareholder Approval for 2002 Stock Option Repricing Plan - Electronically Filed With SEC	December 13, 2001
TWENTY-ONE	Form 10Q for CTI for quarter ending October 31, 2001 - Electronically Filed With SEC	December 14, 2001

TWENTY-TWO	Proxy Statement Soliciting Shareholder Approval for 2002 Stock Option Plan - Electronically Filed With SEC	January 16, 2002
TWENTY-THREE	E-mail from CTI employee to David Kreinberg regarding data entry of option grants from the "as of" October 22, 2001 grant.	January 23, 2002
TWENTY-FOUR	E-mail from CTI employee to Garth Moran regarding Notices of Grant of Stock Options from the "as of" October 22, 2001 grant	March 20, 2002
TWENTY-FIVE	E-mail from CTI employee to Zvia Barak regarding Stock Option Agreements from the "as of" October 22, 2001 grant	March 25, 2002
TWENTY-SIX	Form 10-K for CTI for fiscal year ended January 31, 2002 - Electronically Filed With SEC	April 30, 2002
TWENTY-SEVEN	Form 10-K/A for CTI for fiscal year ended January 31, 2002 - Electronically Filed With SEC	May 29, 2002
TWENTY-EIGHT	Form 10-K for CTI for fiscal year ended January 31, 2003 - Electronically Filed With SEC	April 30, 2003
TWENTY-NINE	Form 10-K/A for CTI for fiscal year ended January 31, 2003 - Electronically Filed With SEC	May 30, 2003
THIRTY	Form 10-K for CTI for fiscal year ended January 31, 2004 - Electronically Filed With SEC	April 14, 2004

(Title 18, United States Code, Sections 1343, 2 and 3551 et seq.)

COUNT THIRTY-ONE
(Money Laundering)

70. The allegations contained in paragraphs 1 through 49 are realleged and incorporated as if fully set forth in this paragraph.

71. In or about and between 1998 and 2006, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant JACOB ALEXANDER, also known as "Kobi Alexander," knowing that the property involved in financial transactions represented the proceeds of some form of unlawful activity, did knowingly and intentionally conduct and attempt to conduct financial transactions affecting interstate and foreign commerce which in fact involved the proceeds of specified unlawful activity, to wit: mail, wire, and securities fraud, knowing that the transactions were designed in whole and in part to conceal and disguise the nature, location, source, ownership and control of such proceeds.

(Title 18, United States Code, Sections 1956(a)(1)(B)(i), 2 and 3551 et seq.)

COUNT THIRTY-TWO
(Engaging in Unlawful Monetary Transactions)

72. The allegations contained in paragraphs 1 through 49 are realleged and incorporated as if fully set forth in this paragraph.

73. In or about and between 1998 and 2006, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant JACOB ALEXANDER, also known as "Kobi Alexander," did knowingly and intentionally engage and attempt to engage in monetary transactions, in and affecting interstate and foreign commerce, in criminally derived property of a value greater than $10,000 and that was derived from specified unlawful activity, to wit: mail, wire, and securities fraud, knowing that the property involved in such financial transactions represented the proceeds of some form of unlawful activity.

(Title 18, United States Code, Sections 1957(a), 1957(b), 2 and 3551 et seq.)

COUNT THIRTY-THREE
(Money Laundering)

74. The allegations contained in paragraphs 1 through 49 are realleged and incorporated as if fully set forth in this paragraph.

75. In or about and between January 2006 and August 2006, both dates being approximate and inclusive, within the Southern District of New York and elsewhere, the defendant JACOB ALEXANDER, also known as "Kobi Alexander," did knowingly and intentionally transport, transmit and transfer monetary instruments and funds, and attempt to do so, from a place in the United States, to wit: New York, New York, to and through a

place outside the United States, to wit: Israel, knowing that the monetary instruments and funds involved in the transportation, transmission and transfer represented the proceeds of some form of unlawful activity, and knowing that such transportation, transmission and transfer was designed in whole or in part to conceal and disguise the nature, location, source, ownership and control of the proceeds of the specified unlawful activity, to wit: mail, wire and securities fraud.

(Title 18, United States Code, Sections 1956(a)(2)(B)(i), 2 and 3551 et seq.)

COUNT THIRTY-FOUR
(Obstruction of Criminal Investigation: Bribery)

76. The allegations contained in paragraphs 1 through 49 are realleged and incorporated as if fully set forth in this paragraph.

77. On about and between March 11, 2006 and March 15, 2006, both dates being approximate and inclusive, within the Southern District of New York, the defendant JACOB ALEXANDER, also known as "Kobi Alexander," did knowingly and willfully endeavor by means of bribery to obstruct and prevent the communication of information relating to violations of criminal statutes of the United States, namely the offenses set

forth in Counts One through Thirty of this Superseding Indictment, by another person to a criminal investigator.

(Title 18, United States Code, Sections 1510(a) and 3551 et seq.)

COUNT THIRTY-FIVE
(Obstruction of Official Proceeding: Witness Tampering)

78. The allegations contained in paragraphs 1 through 49 are realleged and incorporated as if fully set forth in this paragraph.

79. On about and between March 11, 2006 and March 15, 2006, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant JACOB ALEXANDER, also known as "Kobi Alexander," did knowingly and willfully attempt to corruptly persuade another person with intent to influence and prevent the testimony of that person in an official proceeding.

(Title 18, United States Code, Sections 1512(b)(1) and 3551 et seq.)

CRIMINAL FORFEITURE ALLEGATION
FOR COUNTS ONE THROUGH THIRTY
(Mail, Wire, Securities Fraud, False SEC Filings and Conspiracy)

80. The United States hereby gives notice to the defendant that, upon his conviction of Counts One through Thirty, the government will seek forfeiture in accordance with Title 18, United States Code, Section 981(a)(1)(C) and Title

28, United States Code, Section 2461(c), which require any person convicted of such offenses to forfeit any property constituting or derived from proceeds obtained directly or indirectly as a result of such offenses, including but not limited to:

(a) all right, title and interest in all funds on deposit at Bank Hapoalim, Account No. 131883, held in the name of Kobi J. Alexander;

(b) all right, title and interest in all funds on deposit at Bank Leumi, Account No. 603401/78, held in the name of Jacob Alexander; and

(c) a sum of money equal to approximately $138,000,000 in United States currency.

81. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

(a) cannot be located upon the exercise of due diligence;

(b) has been transferred or sold to, or deposited with, a third party;

(c) has been placed beyond the jurisdiction of the court;

(d) has been substantially diminished in value; or

(e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c), to seek forfeiture of any property of such defendant up to the value of the forfeitable property described above, including, but not limited to:

(a) all right, title and interest in the apartment located at 301 West 57th Street, Apt. 34AB, New York, New York 10019 held in the name of Jacob Alexander; and

(b) all right, title and interest in 230 West 56th Street, Apt. 64A, New York, New York 10019, held in the name of Jacob Alexander.

(Title 28, United States Code, Section 2461(c); Title 18, United States Code, Section 981(a)(1)(C); Title 21, United States Code, Section 853)

CRIMINAL FORFEITURE ALLEGATION
FOR COUNTS THIRTY-ONE THROUGH THIRTY-THREE
(Money Laundering)

82. The United States hereby gives notice to the defendant that, upon his conviction of Counts Thirty-One through Thirty-Three, the government will seek forfeiture in accordance with Title 18, United States Code, Section 982, of all property involved his violation of those offenses, and all property traceable to such property, including but not limited to:

(a) all right, title and interest in all funds on deposit at Bank Hapoalim, Account No. 131883, held in the name of Kobi J. Alexander; and

(b) all right, title and interest in all funds on deposit at Bank Leumi, Account No. 603401/78, held in the name of Jacob Alexander.

If any of the above described forfeitable property, as a result of any act or omission of the defendant:

(a) cannot be located upon the exercise of due diligence;

(b) has been transferred or sold to, or deposited with, a

third party;

(c) has been placed beyond the jurisdiction of the court;

(d) has been substantially diminished in value; or

(e) has been commingled with other property, which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of such defendant up to the value of the forfeitable property described above, including but not limited to the following:

(a) all right, title and interest in the apartment located at 301 West 57th Street, Apt. 34AB, New York, New York 10019 held in the name of Jacob Alexander; and

(b) all right, title and interest in 230 West 56th Street, Apt. 64A, New York, New York 10019, held in the name of Jacob Alexander.

(Title 18, United States Code, Section 982; Title 21, United States Code, Section 853)

A TRUE BILL

FOREPERSON

ROSLYNN R. MAUSKOPF
UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK

BY: Eric Gajewski
ACTING UNITED STATES ATTORNEY
PURSUANT TO 28 C.F.R. 0.136

F#2006R00740
06-628 (S-1) (NGG)
FORM DBD-34
JUN. 85

UNITED STATES DISTRICT COURT

EASTERN DISTRICT of NEW YORK

Criminal Division

THE UNITED STATES OF AMERICA

JACOB ALEXANDER,
also known as
"Kobi Alexander,"
Defendant.

SUPERSEDING INDICTMENT

(T. 15, U.S.C., §§ 78j(b), 78m(a) and 78ff;
T. 18, U.S.C., §§ 371, 981(a)(1)(C), 982, 1341, 1343,
1348, 1349, 1510(a), 1512(b)(1), 1956(a)(1)(B)(I),
1956(a)(2)(B)(i), 1957(a), 1957(b), 2 and 3551 et seq.;
T. 21, U.S.C., § 853; T. 28, U.S.C., § 2461(c))

A true bill.

_____
Foreman

Filed in open court this _____ *day,*

of _____ *A.D. 20* _____

_____
Clerk

Bail, $ _____

AUSA Ilene Jaroslaw, (718) 254-6236