

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>UNITED STATES OF AMERICA</b>	<b>:</b>	<b>CRIMINAL NO.</b> _____
<b>v.</b>	<b>:</b>	<b>DATE FILED:</b> _____
<b>KADIDIA TRAORE,</b> <b>a/k/a “Mariama”</b>	<b>:</b>	<b>VIOLATIONS: 18 U.S.C. § 1343</b> <b>(Wire fraud - 21</b>
<b>a/k/a “Hadja Camara”</b>	<b>:</b>	<b>Counts)</b>
<b>MUHAMMAD WURIE JAH</b>	<b>:</b>	<b>18 U.S.C. § 2 (Aiding</b>
<b>AHMED TOUNKARA</b>	<b>:</b>	<b>and abetting)</b>

**INDICTMENT**

**COUNTS ONE THROUGH TWENTY-ONE**

THE GRAND JURY CHARGES THAT:

1. From on or about November 5, 2003, to on or about December 8, 2003, at Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendants

**KADIDIA TRAORE,**  
**a/k/a “Mariama”**  
**a/k/a “Hadja Camara”**  
**MUHAMMAD WURIE JAH,**  
**and AHMED TOUNKARA**

devised and intended to devise a scheme to defraud a person known to the grand jury as M.M., and others, and to obtain money and property by means of false and fraudulent pretenses, representations, and promises.

It was part of the scheme that:

2. Defendants KADIDIA TRAORE, MUHAMMAD WURIE JAH, and AHMED TOUNKARA falsely represented to M.M. that they were interested in purchasing his gas station in Philadelphia, Pennsylvania.

3. Defendants KADIDIA TRAORE, MUHAMMAD WURIE JAH, and AHMED TOUNKARA offered to pay M.M. \$225,000 for his gas station from a suitcase supposedly containing approximately \$3 million in United States currency that had been covered with a black substance, when in fact, the suitcase contained only paper covered with a black substance, in the size and shape of United States currency.

4. Defendants KADIDIA TRAORE, MUHAMMAD WURIE JAH, and AHMED TOUNKARA told M.M. that to enable the defendants to buy M.M.'s gas station, M.M. would have to loan the defendants \$125,000 in cash. The defendants falsely represented to M.M. that the \$125,000 was necessary to purchase sufficient quantities of a liquid chemical that would be used to clean the alleged money that was covered in the black substance and make the alleged money negotiable. The defendants further falsely represented to M.M. that once the money was cleaned, the defendants would launder the tainted money through M.M. in the following manner: repay M.M. the \$125,000 that he would have loaned the defendants; pay M.M. \$225,000 for his gas station; and pay M.M. and others who helped M.M. approximately \$300,000 for the loan of \$125,000 and for holding the suitcase containing the alleged money.

5. To conceal their true identities and avoid detection by M.M. or authorities, defendants KADIDIA TRAORE, MUHAMMAD WURIE JAH, and AHMED TOUNKARA communicated with M.M. concerning the scheme using cellular telephones whose service was purchased with false identification information.

6. On or about December 8, 2003, defendants KADIDIA TRAORE, MUHAMMAD WURIE JAH, and AHMED TOUNKARA accepted \$5,000 in cash from M.M. as a partial payment of the \$125,000 that M.M. had agreed to loan the defendants for the

purchase of the liquid chemical to clean the alleged money.

THE WIRES

7. On or about each of the dates and times set forth below, in the Eastern District of Pennsylvania and elsewhere, defendants

**KADIDIA TRAORE,**  
**a/k/a “Mariama”**  
**a/k/a “Hadjia Camara”**  
**MUHAMMAD WURIE JAH,**  
**and AHMED TOUNKARA,**

for the purpose of executing the scheme described above, and aiding and abetting its execution, caused to be transmitted by means of wire communication in interstate commerce the signals and sounds described below for each count, each transmission constituting a separate count:

<u>COUNT</u>	<u>DATE &amp; TIME</u>	<u>DESCRIPTION</u>
1	11/6/03 12:42 p.m.	A telephone call from M.M. in Philadelphia, Pennsylvania, at telephone number 610-842-1381, to Washington, D.C., at telephone number 202-321-8870
2	11/7/03 1:23 p.m.	A telephone call from Washington, D.C., at telephone number 202-321-8870, to M.M. in Philadelphia, Pennsylvania, at telephone number 610-842-1381
3	11/10/03 10:23 a.m.	A telephone call from M.M. in Philadelphia, Pennsylvania, at telephone number 610-842-1381, to Washington, D.C., at telephone number 202-321-8870
4	11/10/03 10:33 a.m.	A telephone call from Washington, D.C., at telephone number 202-321-8870, to M.M. in Philadelphia, Pennsylvania, at telephone number 610-842-1381
5	11/13/03 11:46 a.m.	A telephone call from Washington, D.C., at telephone number 202-321-8870, to M.M. in Philadelphia, Pennsylvania, at telephone number 610-842-1381
6	11/15/03 10:05 a.m.	A telephone call from M.M. in Philadelphia, Pennsylvania, at telephone number 610-842-1381, to Washington, D.C., at telephone number 202-321-8870

7	11/17/03 3:04 p.m.	A telephone call from Washington, D.C., at telephone number 202-321-8870, to M.M. in Philadelphia, Pennsylvania, at telephone number 610-842-1381
8	11/17/03 6:27 p.m.	A telephone call from Washington, D.C., at telephone number 202-321-8870, to M.M. in Philadelphia, Pennsylvania, at telephone number 610-842-1381
9	11/17/03 7:20 p.m.	A telephone call from M.M. in Philadelphia, Pennsylvania, at telephone number 610-842-1381, to Washington, D.C., at telephone number 202-321-8870
10	11/19/03 10:23 a.m.	A telephone call from M.M. in Philadelphia, Pennsylvania, at telephone number 215-922-5305, to Washington, D.C., at telephone number 202-321-8870
11	11/19/03 11:25 a.m.	A telephone call from Washington, D.C., at telephone number 202-321-8870, to M.M. in Philadelphia, Pennsylvania, at telephone number 610-842-1381
12	11/24/03 11:03 a.m.	A telephone call from M.M. in Philadelphia, Pennsylvania, at telephone number 610-842-1381, to Washington, D.C., at telephone number 202-321-8870
13	11/24/03 11:09 a.m.	A telephone call from M.M. in Philadelphia, Pennsylvania, at telephone number 215-922-5305, to Washington, D.C., at telephone number 202-321-8870
14	11/24/03 12:24 p.m.	A telephone call from M.M. in Philadelphia, Pennsylvania, at telephone number 610-842-1381, to Washington, D.C., at telephone number 202-321-8870
15	11/24/03 12:25 p.m.	A telephone call from M.M. in Philadelphia, Pennsylvania, at telephone number 610-842-1381, to Washington, D.C., at telephone number 202-321-8870
16	11/25/03 12:42 p.m.	A telephone call from M.M. in Philadelphia, Pennsylvania, at telephone number 610-842-1381, to Washington, D.C., at telephone number 202-321-8870
17	11/25/03 12:55 p.m.	A telephone call from M.M. in Philadelphia, Pennsylvania, at telephone number 610-842-1381, to Washington, D.C., at telephone number 202-321-8870
18	11/28/03 6:18 p.m.	A telephone call from Washington, D.C., at telephone number 240-426-5416, to M.M. in Philadelphia, Pennsylvania, at telephone number 610-842-1381

19	11/28/03 6:46 p.m.	A telephone call from Washington, D.C., at telephone number 240-426-5416, to M.M. in Philadelphia, Pennsylvania, at telephone number 610-842-1381
20	11/28/03 8:34 p.m.	A telephone call from Washington, D.C., at telephone number 240-426-5416, to M.M. in Philadelphia, Pennsylvania, at telephone number 610-842-1381
21	12/3/03 11:38 a.m.	A telephone call from Washington, D.C., at telephone number 240-426-5416, to M.M. in Philadelphia, Pennsylvania, at telephone number 610-842-1381

All in violation of Title 18, United States Code, Sections 1343 and 2.

**A TRUE BILL:**

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**FOREPERSON**

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**PATRICK L. MEEHAN**  
United States Attorney