

UNITED STATES DISTRICT COURT

**FILED**

SOUTHERN DISTRICT OF TEXAS

09 OCT 29 AM 10:59 *27*

LAREDO DIVISION

U.S. COURTS  
SOUTHERN DISTRICT  
OF TEXAS

UNITED STATES OF AMERICA

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§

V.

CRIMINAL NO. **L-09-2499**

**VAHRAM AYNILIAN (1)**

**FRED LUKACH (2)**

**CRIMINAL INFORMATION**

THE UNITED STATES ATTORNEY CHARGES:

**COUNT ONE**

On or about January 5, 2007 in the Southern District of Texas, and within the jurisdiction of the Court, defendant,

**VAHRAM AYNILIAN**

fraudulently and knowingly facilitated the transportation of merchandise from the United States to Mexico by selling fraudulent North American Free Trade Agreement (NAFTA) Certificate of Origin documents: to wit: after a shipment of fabric rolls manufactured outside the United States arrived in Laredo, TX, defendant, **VAHRAM AYNILIAN**, contrary to law or regulation of the United States sold fraudulent NAFTA Certificate of Origin documents, knowing that said documents would be presented to Mexican Customs to fraudulently claim that the shipment of fabric rolls were manufactured in the United States (when he knew they were not) thereby avoiding the payment of Mexican duties, as follows:

<b>Count</b>	<b>Date of Offense</b>	<b>Shipment of Merchandise</b>
<b>One</b>	On or about 01/05/2007	Invoice Number: 80007 Country Exported: Foreign Merchandise / Quantity: Fabric Rolls

All in violation of Title 18, United States Code, Sections 2 and 554.

**COUNT TWO**

On or about February 18, 2009 in the Southern District of Texas, and within the jurisdiction of the Court, defendant,

**FRED LUKACH**

fraudulently and knowingly facilitated the transportation of merchandise from the United States to Mexico by hiring another person to provide fraudulent North American Free Trade Agreement (NAFTA) Certificate of Origin documents: to wit: after a shipment of textiles manufactured outside of the United States arrived in Laredo, TX, defendant, **FRED LUKACH**, contrary to law or regulation of the United States hired another person to provide fraudulent NAFTA Certificate of Origin documents, knowing that said documents would be presented to Mexican Customs to fraudulently claim that the shipment of fabric rolls were manufactured in the United States (when he knew they were not) thereby avoiding the payment of Mexican duties, as follows:

<b>Count</b>	<b>Date of Offense</b>	<b>Shipment of Merchandise</b>
<b>Two</b>	On or about 02/18/2009	Invoice Number: 12538 Country Exported: Foreign Merchandise / Quantity: Fabric Rolls

All in violation of Title 18, United States Code, Sections 2 and 554.

**NOTICE OF HOLDINGS SUBJECT TO FORFEITURE**

Pursuant to Title 19, United States Code, Section 1595a (d), as a result of the commission of the violation charged in Count One of the Indictment, notice is given that the defendant, **VAHRAM AYNILIAN**, shall forfeit to the United States of America– the proceeds obtained, directly or indirectly, as the result of the offense charged in Count One, specifically the sum of ONE HUNDRED NINETY-NINE THOUSAND AND TWO-HUNDRED ONE DOLLARS and 20/100 (\$199,201.20) United State currency.

TIM JOHNSON  
UNITED STATES ATTORNEY



By: SAM S. SHELDON  
Assistant United States Attorney

USA-74-24b  
(Rev. 6-1-71)

LAREDO DIVISION **CRIMINAL DOCKET**

NO. **L-00-2499**

FILE:  
CRIMINAL INFORMATION

Filed 10-29-09

Judge: G.P. Kazen

UNITED STATES OF AMERICA

ATTORNEYS:  
TIM JOHNSON, USA

VS.

SAM SHELDON, AUSA

VAHRAM AYNILIAN  
FRED LUKACH

	Appt'd	Private

CHARGE: Cts. 1-2: SMUGGLING OF GOODS INTO THE UNITED STATES  
(TOTAL) [18 USC 2 AND 554]  
(COUNTS:) \_\_\_\_\_  
(2) \_\_\_\_\_

**PENALTY:** CTS 1-2: NOT MORE THAN 10 YRS; NOT MORE THAN 3 YRS SUPERVISED  
RELEASE; \$250,000.00

In Jail: \_\_\_\_\_ NAME & ADDRESS  
On Bond: \_\_\_\_\_ of Surety:  
No Arrest: \_\_\_\_\_

**PROCEEDINGS:**

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