

FILED

AUG 10 2006

Phil Lombardi, Clerk
U.S. DISTRICT COURT

IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF OKLAHOMA

UNITED STATES OF AMERICA,)
)
 Plaintiff,)
)
 vs.)
)
 LEE R. SNIDER,)
)
 Defendant.)

Case No. **06 CR 136 HDC**

INFORMATION

[18 U.S.C. 1956(h): Conspiracy to
Money Launder]

THE UNITED STATES ATTORNEY CHARGES:

COUNT ONE

[18 U.S.C. § 1956(h)]

Beginning on or about September 2001, and continuing through about October 2002, exact dates unknown, in the Northern District of Oklahoma and elsewhere, defendant **LEE R. SNIDER** and others known and unknown to the United States Attorney, wilfully and knowingly combined, conspired, confederated and agreed together and with each other to commit Laundering of Monetary Instruments, in violation of Title 18, United States Code, Section 1956(h) and Title 18, United States Code, Section 2, offenses against the United States, to-wit:

S/D

OBJECTS OF THE CONSPIRACY

1. To knowingly and wilfully conduct and attempt to conduct financial transactions affecting interstate and foreign commerce, involving proceeds of a specified unlawful activity; that is, illegal importation and distribution of marijuana, knowing that the transactions were designed, in whole and in part, to conceal and disguise the source, ownership, and control of the proceeds of said specified unlawful activity and to avoid a transaction reporting requirement under Federal law, knowing that the property involved in the financial transaction represented proceeds of some form of unlawful activity, in violation of Title 18, United States Code, Sections 1956(h), (a)(1)(B)(i) and (ii).

a. At all relevant times the defendant utilized an address within the Northern District of Oklahoma.

b. At all time relevant Mach Aero International, Inc. was operated by **LEE R. SNIDER**.

c. At all times relevant currency transaction reports, as set forth in Title 31, United States Code, Section 5313 are required for transactions involving currency, including deposits and withdrawals. These reports were to be made by the financial institution as required by federal regulation.

d. At all times relevant Central Burners Jet Inc. was a company involved in the sale and purchase of aircraft; JODA LLC was a company involved in the financing of airplane purchases and TA Aviation Inc. was a company involved in purchase and leasing

aircraft, among other things.

e. The airplanes are described as follows:

1. Lockheed Jet Star aircraft, Model 1329, registration number N731WL, serial number 5070;
2. Aero Commander, Model 1121, registration number N382AA, serial number 56;
3. Aero Commander, Model 1121A, registration number N121A, serial number 129;
4. Aero Commander, Model 1121, registration number N40593 aka N499TR, serial number 41;
5. Dassault/SUD, Model 20F, registration number N513AC; serial number 242;
6. Aero Commander, Model 1121, registration number N74GM, serial number 74;
7. GulfStream, Model GII, registration number N701S, serial number 069;
8. Cessna, Model 208 Caravan, registration number N770TC, serial number 20800014.

MANNER AND MEANS

LEE R. SNIDER did and would operate an aircraft leasing business known as Mach

Aero International, Inc. in the Northern District of Oklahoma.

LEE R. SNIDER would and did lease aircraft in a manner so as to hide the involvement of persons known to the United States Attorney. Said activity done to avoid detection by law enforcement and to disguise the source and ownership of funds used in transactions.

LEE R. SNIDER would and did enter into agreements with individuals known and unknown to the United States Attorney.

LEE R. SNIDER would and did obtain financing for aircraft and then lease said aircraft to individuals known to the United States Attorney.

LEE R. SNIDER would and did collect funds, in U.S. Currency, transported in suitcases and briefcases for the leasing of aircraft. Said funds were derived from narcotics related activity conducted by others known to the United States Attorney.

LEE R. SNIDER would and did transport U.S. Currency to locations within the State of Oklahoma to further purchase or lease various aircraft.

LEE R. SNIDER would and did obtain funds from persons known and unknown to the United States Attorney and applied said funds towards the purchase of aircraft.

LEE R. SNIDER would and did assign lease of said aircraft to individuals knowing that funds used were derived from unlawful activity that being narcotics trafficking.

LEE R. SNIDER would and did accept U.S. Currency and transported said currency to Houston, Texas.

LEE R. SNIDER would and did register aircraft in the name of Mach Aero International knowing the aircraft was to be used or had been used in narcotics related activity.

LEE R. SNIDER would and did claim ownership of aircraft seized by law enforcement authorities in Panama.

LEE R. SNIDER would and did structure deposits of U.S. Currency in various financial institutions in a manner so as to avoid currency transaction reporting requirements and disguise the source and ownership of said currency. **LEE R. SNIDER** utilized various bank accounts at financial institution within the Northern District of Oklahoma to structure the deposits.

LEE R. SNIDER would and did obtain U.S. Currency derived from narcotics related activity and assist in delivery to others in various locations throughout the United States.

LEE R. SNIDER would and did secret currency at a location in the Northern District of Oklahoma knowing said money was derived from unlawful activity, that being narcotics trafficking.

OVERT ACTS

In furtherance of the conspiracy and to achieve the objects thereof, the defendant and others both known and unknown to the United States Attorney, committed and caused to be committed the following overt acts, among others, in the Northern District of Oklahoma and elsewhere.

1. On or about September 18, 2001, **LEE R. SNIDER**, doing business as Mach Aero International, entered into an agreement to purchase and then to lease a Lockheed JetStar 731 aircraft, registered as N731WL. Said lease was to an individual known to the United States Attorney. Funds used for this transaction were derived from narcotics trafficking.

2. On or about September 25, 2001, **LEE R. SNIDER** purchased Lockheed JetStar 731, registration number N731WL from Central Business Jets, Inc. for \$2,295,000. Said purchase was financed by Joda LLC for \$1.6 million and Central Burners Jets for \$220,000. \$700,000 in U.S. Currency was placed in escrow for the purchase. Said currency was derived from narcotics related activity.

3. Beginning in or around September of 2001, **LEE R. SNIDER** accepted U.S. Currency transported in bags and briefcases from a person known to the United States Attorney, within the Northern District of Oklahoma. Said currency was derived from narcotics related activity.

4. On or about November 20, 2002, **LEE R. SNIDER** transported approximately \$125,000 in cash to Aero Reports Inc. in Oklahoma City. Said currency was to be used as down payment to purchase aircraft, Aero Commander aircrafts, registration numbers N499TR and N121PA.

5. On or about November 25, 2002, **LEE R. SNIDER** agreed to assign the lease of an aircraft to individuals known to Snider to be involved in narcotics trafficking. Said aircraft was to be used to transport controlled substances from outside the United States to

locations within the United States and currency from within the United States to outside the United States.

6. On or about November 25, 2002, **LEE R. SNIDER** took possession of \$980,000 in U.S. Currency. Said currency was derived from narcotics trafficking.

7. On or about December 19, 2002, **LEE R. SNIDER** transported \$700,000 in U.S. Currency from the Northern District of Oklahoma to Houston, Texas. Said currency was derived from narcotics trafficking.

8. In November of 2002, **LEE R. SNIDER**, leased or purchased a Lockheed, JetStar 731 aircraft, registration number N121PA in the name of Mach Aero International, Inc. knowing said aircraft was going to be used to transport controlled substances and U.S. Currency derived from the sale of controlled substances.

9. In November of 2002, **LEE R. SNIDER**, leased or purchased an Aero Commander aircraft, registration number N382AA in the name of Mach Aero International, Inc. knowing said aircraft was being used to transport controlled substances and U.S. Currency derived from the sale of controlled substances.

10. On or before November 7, 2002, others known to the United States Attorney secreted \$3.1 million in U.S. Currency within the Aero Commander aircraft, registration number N382AA.

11. On January 22, 2003, **LEE R. SNIDER** attempted to claim the Aero Commander aircraft, registration number N382AA from law enforcement authorities in

Panama.

12. Between December 4, 2001 and March 2003, **LEE R. SNIDER** structured the deposit of approximately \$603,670 in U.S. Currency in various fraudulent transactions within the Northern District of Oklahoma. Said structuring was designed to avoid the currency transaction reporting requirements and to disguise and conceal the nature, source and ownership of the funds.

13. On or about February 18, 2003, **LEE R. SNIDER** and others known to the United States Attorney, delivered approximately \$499,000 in U.S. Currency to an individual in Fort Lauderdale, Florida. Said funds were to be used to purchase a Dassault/SUD, Model Falcon 20F aircraft, registration number N513AC. Said aircraft was to be used to transport controlled substances and U.S. Currency derived from the sale of controlled substances.

14. On or about February 22, 2003, **LEE R. SNIDER** and others known to the United States Attorney delivered a suitcase containing \$500,000 to an individual in Atlanta, Georgia. Further, **LEE R. SNIDER** and others known to the United States Attorney flew the Dassault/SUD, Model Falcon 20F aircraft, registration number N513AC to Houston, Texas.

15. On or about March 24, 2003, persons known to the United States Attorney, paid an individual \$880,000 in U.S. Currency. Those persons gave \$300,000 in U.S. Currency to **LEE R. SNIDER** for the purchase of a GulfStream, Model GII Jet aircraft, registration number N701S. Said currency was derived from the sale of controlled substances.

16. On or about April 14, 2003, **LEE R. SNIDER** had concealed approximately \$220,000 in U.S. Currency in a residence located in the Northern District of Oklahoma. Said currency was derived from the sale of controlled substances.

In furtherance of the conspiracy and to achieve the objects thereof, the defendant and others both known and unknown to the United States Attorney, committed and caused to be committed the following overt acts, among others, in the Northern District of Oklahoma, and elsewhere. Said overt acts 17-47 are depicted in the chart below which lists transactions involving accounts in the name of, Mach Aero International, Inc. and **LEE R. SNIDER**.

Overt Act #	Payee Name	Date	Check Number	Amount
17	Central Business Jets Inc.	8/22/2002	Wire Transfer	\$10,000.00

Overt Act #	Payee Name	Date	Check Number	Amount
18	Central Business Jets Inc.	9/3/2002	Wire Transfer	\$10,000.00
19	Central Business Jets Inc.	9/3/2002	Wire Transfer	\$10,000.00
20	Central Business Jets Inc.	11/13/2002	1012	\$25,000.00
21	Central Business Jets Inc.	12/18/2002	1001	\$29,973.50
22	Central Business Jets Inc.	12/18/2002	3012	\$29,973.50
23	JODA LLC	10/25/2001	Wire Transfer	\$27,395.90
24	JODA LLC	12/7/2001	Wire Transfer	\$27,395.90
25	JODA LLC	1/8/2002	1052	\$27,395.90
26	JODA LLC	2/5/2002	1069	\$27,395.90
27	JODA LLC	3/7/2002	1079	\$27,395.90
28	JODA LLC	4/18/2002	1111	\$27,395.90
29	JODA LLC	5/16/2002	1125	\$27,395.90
30	JODA LLC	6/10/2002	1143	\$27,395.90
31	JODA LLC	7/11/2002	1182	\$27,395.90
32	JODA LLC	8/5/2002	1198	\$28,765.70
33	JODA LLC	9/4/2002	1225	\$27,395.90
34	JODA LLC	10/4/2002	1270	\$27,395.90
35	JODA LLC	11/8/2002	1011	\$27,395.90
36	JODA LLC	12/9/2002	1041	\$27,395.90
37	JODA LLC	1/15/2003	1001	\$13,395.90
38	JODA LLC	2/12/2003	1032	\$20,000.00
39	JODA LLC	3/11/2003	1007	\$25,135.50
40	JODA LLC	3/12/2003	1043	\$15,000.00
41	TA Aviation	9/3/2003	Wire Transfer	\$28,000.00

Overt Act #	Payee Name	Date	Check Number	Amount
42	TA Aviation	9/20/2002	Wire Transfer	\$25,000.00
43	TA Aviation	9/20/2002	Wire Transfer	\$25,000.00
44	TA Aviation	9/27/2002	Wire Transfer	\$15,000.00
45	TA Aviation	9/27/2002	Wire Transfer	\$15,000.00
46	TA Aviation	10/11/2002	Wire Transfer	\$25,000.00
47	TA Aviation	10/15/2002	Wire Transfer	\$25,000.00
			TOTAL	\$721,390.80

All in violation of Title 18, United States Code, Section 1956(h).

UNITED STATES OF AMERICA

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