



the Filipino-manufactured, Indian-style jewelry as genuine Indian-made jewelry.

Overt Acts

4. In furtherance of the conspiracy, and to effect the objects thereof, the following overt acts, among others, were committed in the District of New Mexico, and elsewhere:

- a. From on or about November 26, 2012, and continuing to on or about June 5, 2014, **NAEL ALI**, owned and operated Gallery 8 and Galleria Azul, two distinct Native American-style arts and crafts retail stores in Old Town Albuquerque, New Mexico;
- b. From on or about November 26, 2012, and continuing to on or about June 5, 2014, **NAEL ALI**, owned and operated a separate Galleria Azul, a Native American-style arts and crafts retail store in Scottsdale, Arizona;
- c. From on or about November 26, 2012, and continuing to on or about June 5, 2014, **NAEL ALI**, employed **CHRISTINA BOWEN** to work at his stores Gallery 8 and Galleria Azul;
- d. On the following dates, **NAEL ALI** purchased from **MOHAMMAD MANASRA** Native American-style jewelry manufactured in the Philippines in the following amounts:

Date	Check Signer / Memo	Amount	Payee
12/10/2012	Nael Ali / Galleria Azul (NM)	\$750	Mohammad Manasra
12/18/2012	Nael Ali / Gallery 8	\$750	Mohammad Manasra
1/15/2013	Nael Ali / Gallery 8	\$750	Mohammad Manasra
4/20/2013	Nael Ali / Galleria Azul (NM)	\$400	Mohammad Manasra

5/25/2013	Nael Ali / Galleria Azul (NM)	\$1000	Mohammad Manasra
6/11/2013	Nael Ali / Galleria Azul (NM)	\$500	Mohammad Manasra
6/21/2013	Nael Ali / Galleria Azul (NM)	\$300	Mohammad Manasra
6/25/2013	Nael Ali / Galleria Azul (NM)	\$1000	Mohammad Manasra
8/20/2013	Nael Ali / Galleria Azul (NM)	\$550	Mohammad Manasra
10/8/2013	Nael Ali / Galleria Azul (NM)	\$1000	Mohammad Manasra
10/9/2013	Nael Ali / Galleria Azul (NM)	\$500	Mohammad Manasra
10/23/2013	Nael Ali / Galleria Azul (NM)	\$500	Mohammad Manasra
11/11/2013	Nael Ali / Galleria Azul (AZ)	\$1500	Mohammad Manasra
12/12/2013	Nael Ali / Galleria Azul (AZ)	\$1543	Mohammad Manasra
3/4/2014	Nael Ali / Galleria Azul (AZ)	\$1122	Mohammad Manasra
3/22/2014	Nael Ali / Galleria Azul (AZ)	\$1500	Mohammad Manasra
3/26/2014	Nael Ali / Galleria Azul (NM)	\$1500	Mohammad Manasra
4/15/2014	Nael Ali / Galleria Azul (AZ)	\$1500	Mohammad Manasra
4/15/2014	Nael Ali / Galleria Azul (NM)	\$750	Mohammad Manasra
5/4/2014	Nael Ali / Galleria Azul (AZ)	\$1500	Mohammad Manasra
5/16/2014	Nael Ali / Galleria Azul (AZ)	\$1500	Mohammad Manasra
8/20/2014	Nael Ali / Galleria Azul (NM)	\$1000	Mohammad Manasra
9/18/2014	Nael Ali / Galleria Azul (NM)	\$1000	Mohammad Manasra
10/6/2014	Nael Ali / Gallery Azul (NM)	\$500	Mohammad Manasra
3/21/2013	Nael Ali / Gallery 8	\$851	Mohammad Manasra
4/28/2013	Nael Ali / Gallery 8	\$500	Mohammad Manasra

5/28/2013	Nael Ali / Gallery 8	\$1000	Mohammad Manasra
6/11/2013	Nael Ali / Gallery 8	\$500	Mohammad Manasra

- e. From on or about November 26, 2012, and continuing to on or about June 5, 2014, **MOHAMMAD MANASRA** supplied **NAEL ALI** with Native American-style jewelry manufactured in the Philippines;
- f. From on or about November 26, 2012, and continuing to on or about June 5, 2014, **NAEL ALI** and **CHRISTINA BOWEN**, and others known and unknown to the Grand Jury, displayed and offered for sale within Gallery 8 and Galleria Azul, Native American-style jewelry manufactured in the Philippines in a manner that falsely suggested it was Indian produced, an Indian product, and the product of a particular Indian and Indian tribe, and in excess of \$1,000;
- g. From on or about November 26, 2012, and continuing to on or about June 5, 2014, **NAEL ALI** provided **CHRISTINA BOWEN** with a list of Native American artists' names to match the initials stamped on the Native American-style jewelry manufactured in the Philippines;
- h. On or about November 26, 2012, an employee of Gallery 8, known to the Grand Jury, sold for \$689.08 two Native American-style rings stamped "CK," and a Native American-style pendent and earring set stamped "BB," all manufactured in the Philippines, to an undercover federal agent in a manner that falsely suggested they were Navajo produced, Navajo products, and the products of a particular Navajo artist and the Navajo tribe;

- i. On or about November 30, 2012, an employee working at Galleria Azul, known to the Grand Jury, sold for \$96.30 a Native American-style ring stamped "OY," manufactured in the Philippines, to an undercover federal agent in a manner that falsely suggested it was Navajo produced, a Navajo product, and the product of the Navajo tribe;
- j. On or about April 23, 2013, **NAEL ALI**, sold jewelry, from his business Galleria Azul, to the Oneida Indian Nation in the amount of \$28,085 for the purpose of supplying jewelry to an Oneida tribe gallery in upstate New York and the Oneida's participation in an international festival;
- k. On or about February 26, 2014, **CHRISTINA BOWEN**, while working at Gallery 8, told an undercover federal agent that the rings the agent had purchased on November 26, 2012, were made by the Navajo artist "Calvin Kee";
- l. On or about February 26, 2014, **CHRISTINA BOWEN** called **NAEL ALI** from the Gallery 8 store landline regarding an order of more Calvin Kee rings;
- m. On or about February 26, 2014, **CHRISTINA BOWEN**, while working at Gallery 8, told an undercover agent that she spoke with **NAEL ALI** and he told her he would speak with Calvin Kee to order more rings;
- n. On or about February 26, 2014, **CHRISTINA BOWEN**, while working at Gallery 8, told an undercover agent that Calvin Kee exclusively supplies Gallery 8 with his jewelry;
- o. On or about April 2, 2014, **CHRISTINA BOWEN**, told an undercover federal agent from her Gallery 8 store landline that the Calvin Kee rings were still being produced and that she did not want to rush the artist and interfere with the

production of his high quality product;

- p. On or about May 29, 2014, **NAEL ALI**, while working at Galleria Azul in Scottsdale, Arizona, sold for \$120.00 a Native American-style ring stamped with a raincloud symbol, manufactured in the Philippines, to an undercover federal agent in a manner that falsely suggested it was Navajo produced, a Navajo product, and the product of the Navajo tribe;
- q. On or about May 29, 2014, **NAEL ALI**, made representations to an undercover federal agent that the rings the agent ordered at Gallery 8 on February 26, 2014, had been made by a Navajo artist, "Calvin Kee," though no such artist exists;
- r. On or about May 29, 2014, **NAEL ALI**, told an undercover federal agent that all the jewelry in his stores is made by Native Americans;
- s. On or about May 31, 2014, **CHRISTINA BOWEN**, while working at Gallery 8, told an undercover federal agent that **NAEL ALI** had spoken to the artist Calvin Kee about the agent's order and was informed by Calvin Kee that he could not make all the rings in brown as ordered because he ran out of brown stones;
- t. On or about August 14, 2014, **NAEL ALI**, sold jewelry, from his business Galleria Azul, to the Oneida Indian Nation for the amount of \$9,850 for the purpose of supplying jewelry to an Oneida tribe gallery in upstate New York and the Oneida's participation in an international festival;

In violation of 18 U.S.C. § 371.

Count 2

On or about February 26, 2014, in Bernalillo County, in the District of New Mexico, the defendant, **CHRISTINA BOWEN**, did knowingly display and offer for sale, and did sell for \$1,000 and more, a good, specifically: jewelry, in a manner that suggested that the good was Indian produced, an Indian product, and the product of a particular Indian and Indian tribe, resident within the United States, when in truth and in fact, as she there and then well knew and believed, the good was not Indian produced, an Indian product, and the product of a particular Indian and Indian tribe.

In violation of 18 U.S.C. § 1159.

Count 3

From on or about February 26, 2014, and continuing to on or about June 5, 2014, in Bernalillo County, in the District of New Mexico, the defendants, **NAEL ALI** and **CHRISTINA BOWEN**, did knowingly display and offer for sale, and did sell for \$1,000 and more, a good, specifically: jewelry, in a manner that suggested that the good was Indian produced, an Indian product, and the product of a particular Indian and Indian tribe, resident within the United States, when in truth and in fact, as they there and then well knew and believed, the good was not Indian produced, an Indian product, and the product of a particular Indian and Indian tribe.

In violation of 18 U.S.C. § 1159, 18 U.S.C. § 2.

Count 4

On or about October 19, 2014, in Bernalillo County, in the District of New Mexico, the defendant, **MOHAMMAD MANASRA**, did knowingly display and offer for sale, and did sell for \$1,000 and more, a good, specifically: jewelry, in a manner that suggested that the good was Indian produced, an Indian product, and the product of a particular Indian and Indian tribe, resident within the United States, when in truth and in fact, as he there and then well knew and believed, the good was not Indian produced, an Indian product, and the product of a particular Indian and Indian tribe.

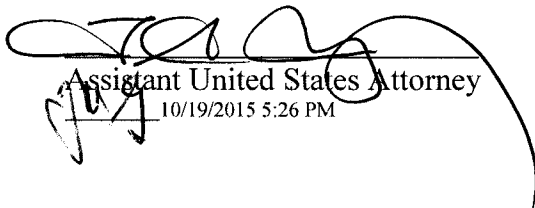
In violation of 18 U.S.C. § 1159.

A TRUE BILL:

/s/

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FOREPERSON OF THE GRAND JURY



Assistant United States Attorney  
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