

U.S. DISTRICT COURT  
 NORTHERN DISTRICT OF TEXAS  
**FILED**  
 SEP | 3 2006  
 CLERK, U.S. DISTRICT COURT  
 By \_\_\_\_\_ Deputy

IN THE UNITED STATES DISTRICT COURT  
 FOR THE NORTHERN DISTRICT OF TEXAS  
 DALLAS DIVISION

ORIGINAL

UNITED STATES OF AMERICA

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§

v.

No. 3:06-CR-085-L

ABDUL RAHMAN KARRIEM (2)

FACTUAL RESUME

Abdul Rahman Karriem, the defendant, Michael J. Todd, the defendant's attorney,  
 and the United States of America agree to the law and facts as follows:

I. Elements of the Offense

A. Wire Fraud

The essential elements of an offense under 18 U.S.C. § 1343 are as follows:

*First:* that the defendant knowingly created a scheme to defraud, that is, to: recruit straw purchasers and borrowers to purchase targeted single-family residences in the Dallas-Fort Worth area; fraudulently inflate the value of the targeted residences; prepare and submit false and fraudulent loan applications in the name of the straw purchasers to secure mortgage loans based on the inflated value of the targeted residences; obtain inflated loans from mortgage lenders based on the false and fraudulent misrepresentations about the value of the targeted residences as well as the straw purchasers' qualifications; and pay the original owners of the targeted residences from the fraudulently obtained loan proceeds and distribute the remaining loan proceeds among the coconspirators;

- Second:* that the defendant acted with a specific intent to defraud;
- Third:* that the defendant caused another person to use interstate wire communications facilities for the purpose of carrying out the scheme; and
- Fourth:* that the scheme to defraud employed false material representations.

B. Aiding and Abetting

The essential elements of an offense under 18 U.S.C. § 2 are as follows:

- First:* that some person committed the offense of wire fraud as described in Section I.A. above;
- Second:* that the defendant associated with the criminal venture;
- Third:* that the defendant purposefully participated in the criminal venture; and
- Fourth:* that the defendant sought by action to make that venture successful.

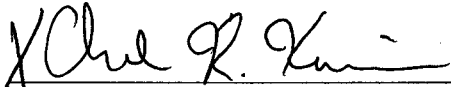
II. Stipulated Facts

The stipulated facts that support the defendant's plea of guilty to Count One of the indictment are as follows:

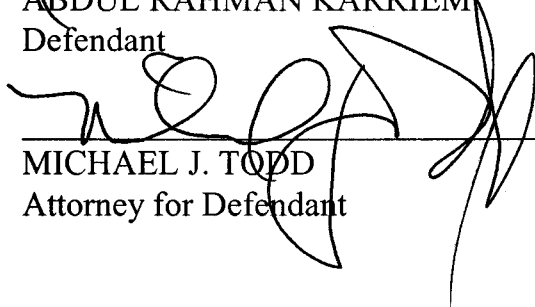
On or about April 4, 2003, co-defendant Vernon Cooks, Jr., also known as Jibreel Rashad, entered into a One to Four Family Residential Contract to purchase a single-family residence located at 419 North Edgefield Avenue, Dallas, Texas (419 North Edgefield) for \$130,000 from G.G. and I.G. On or about April 8, 2003, Cooks entered into a One to Four Family Residential Contract to sell 419 North Edgefield for \$221,000 to M.M., a straw purchaser whom Cooks had recruited.

To fund the transactions, Cooks contacted **Abdul Rahman Karriem**, a mortgage broker and the owner of 1st United Mortgage in Dallas, Texas, to prepare a loan application in M.M.'s name and submit it, along with fraudulent documents, to Wells Fargo Home Mortgage, Inc. (Wells Fargo). **Karriem** knowingly submitted a loan application in M.M.'s name to Wells Fargo that contained material misrepresentations regarding M.M.'s income, rental history and intent to use the loan proceeds to purchase a primary residence. In addition to the loan application, **Karriem** knowingly submitted fraudulent income tax returns and a fraudulent rent verification form to Wells Fargo. As a result of these materially false submissions, **Karriem**, along with Cooks and others, caused Wells Fargo, on or about May 21, 2003, to fund and transmit by wire communication \$208,229.49 to Signature Title Company to close straw borrower M.M.'s purchase of 419 North Edgefield from Cooks. Cooks used \$129,587.59 of the fraudulently obtained loan proceeds to purchase 419 North Edgefield from the original owners, G.G. and I.G., and caused Signature Title Company to transmit by wire communication excess loan proceeds in the amount of \$81,679.14 into his personal bank account. **Karriem** received a portion of the fraudulently obtained loan proceeds, \$5,473.88, for his involvement in the scheme.

AGREED TO AND SIGNED this 13th day of September, 2006.

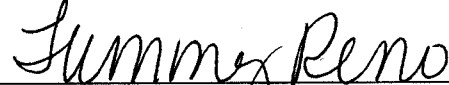


ABDUL RAHMAN KARRIEM  
Defendant



MICHAEL J. TODD  
Attorney for Defendant

RICHARD B. ROPER  
UNITED STATES ATTORNEY



TAMMY RENO  
Assistant United States Attorney  
Texas Bar No. 00797301  
1100 Commerce Street, Third Floor  
Dallas, Texas 75242  
Telephone: 214.659.8600  
Facsimile: 214.659.8803