

IN THE COURT OF COMMON PLEAS OF DELAWARE COUNTY, OHIO

THE STATE OF OHIO,

: **Judge W. Duncan Whitney**

Plaintiff,

vs.

: Case No. 08CR-I-02- *0134*

DIJANA IBRAHIM,

Defendant.

COMMON PLEAS COURT  
DELAWARE COUNTY, OHIO  
FILED  
2008 FEB 29 AM 8:51  
JAN ANTONOPLOS  
CLERK

INDICTMENT

Of the Term Part I in the year two thousand eight.

Count One:

THE JURORS OF THE GRAND JURY of the State of Ohio, within and for the body of the County of Delaware, on their oaths, in the name and by the authority of the State of Ohio, do find and present that during the period of March to September 2006, in a continuing course of conduct in Delaware County and Franklin County, Ohio, DIJANA IBRAHIM,

being employed by, or associated with, an enterprise, to wit: Persons and such entities associated in fact for either illicit and licit purposes, including Hany R. Ibrahim, aka Hany Mohamed, Gihan Ahmed Ismail Zalat, aka Gigi Zahat, Mohamed Hassan, Scott McCann, Alaa Aboulenein, Bonnie Helt-Adams, Hany Bekhit, Kyle Boyde, , Moemen Ibrahim, aka Moemen Khalil, Dijana Ibrahim, Wissam Ibrahim, Mohamed A. Mohamed, aka Mike Mohamed, aka Mike Nour, Nasar Saadeh, Melinda Saadeh, Rimon Said, Rania Saleh, William Tarcy, Jeremy Virgin, Paul Wittenberg, Raed Yaish, American Bank Card International, American Remodeling, Alliante Home Services Brownstone Mortgage, Arab African International Bank Cairo Capital Home Improvements, Contract Ohio Homes, Crew Realty, Dreamland Home Improvements, Extreme Property Investments, First Liberty Land Title, Global Development, G & H Home Improvements, Granville Title, Homeline Improvement, M & M International Trade, Oakland Home Improvements, Star Motors, and others, did engage in a pattern of corrupt activity or the collection of an unlawful debt, at least one of the incidents of corrupt activity being a felony of the first, second or third degree, to wit: Aggravated Theft, a violation of R.C. Section 2913.02, Money Laundering, a violation of R.C. 1315.53(F)(1)(c) 1315.55(A)(1),(A)(2),(A)(3),(A)(4), Receiving Stolen Property, a violation of

R.C. Section 2913.51, and other offenses stated in the indictment which shall be deemed incorporated herein by reference and in the following Predicate Acts constituting conduct defined as racketeering activity under 18 U.S.C. 1961, (Organized Crime Control Act), to wit:

Predicate Act One; BANK FRAUD; Violation of 18 U.S.C.A. § 1344  
DIJANA IBRAHIM, on or about the the period of 2006, in a continuing course of conduct in Delaware County and Franklin County, did knowingly execute, or attempt to execute, a scheme or artifice to defraud a federally insured financial institution, to wit: Mortgage flipping through the direction or facilitation of fraudulent appraisals of real property, the creation of false Federal Income Tax Returns, loan documents and HUD statements, inflation of buyer's income and failure to disclose proper disposition of mortgage proceeds to America's Wholesale Lender, Huntington National Bank, First Magnus Mortgage and Citibank Mortgage and others, or to obtain money, funds, credits, assets, or other property owned by or under the custody or control of, said financial institutions by means of false or fraudulent pretenses, representations or promises in violation of 18 U.S.C., Section 1344,

Predicate Act Two; WIRE FRAUD; Violation of 18 U.S.C., Section 1343

DIJANA IBRAHIM, on or about the period of 2005 to 2007, in a continuing course of conduct in Delaware County and Franklin County devised or intended to devise a scheme or artifice to defraud, to wit: Mortgage flipping through the direction or facilitation of fraudulent appraisals of real property, the creation of false federal income tax returns, loan documents and HUD statements, inflation of buyer's income and failure to disclose proper disposition of mortgage proceeds or for obtaining money or property by means of false or fraudulent pretenses, representations, or promises, transmitted or caused to be transmitted by means of wire, radio, or television communication in interstate or foreign commerce, a writing, and/or signal, for the purpose of executing such scheme or artifice, and the violation affected a financial institution as identified in Predicate Act One, to wit: The transfer of such unlawful proceeds obtained in the scheme or artifice to defraud or about March to September, 2006 to members of the Enterprise as identified in Count One,

the value of such activity exceeding one million dollars, did conduct or participate in, directly or indirectly, the affairs of the enterprise through a pattern of corrupt activity or the collection of an unlawful debt,

this being in violation of Section 2923.32(A)(1) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

Count Two:

THE JURORS OF THE GRAND JURY of the State of Ohio, within and for the body of the County of Delaware, on their oaths, in the name and by the authority of the State of Ohio, do find and present that during the period of March to September, 2006, in a continuing course of conduct in Delaware County and Franklin County, Ohio, DIJANA IBRAHIM,

being employed by, or associated with, an enterprise, as identified in Count One of the Indictment and incorporated herein as if fully rewritten, through a pattern of corrupt activity as identified in Count One of the Indictment and incorporated herein as if fully re-written, or the collection of an unlawful debt, did acquire or maintain, directly or indirectly, an interest in, or control of, such enterprise, or real property, to wit: XXX9 Loch Levin, xxx7 Royal County Down and Grennan Woods,

this being in violation of Section 2923.32(A)(2) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

Count Three:

THE JURORS OF THE GRAND JURY of the State of Ohio, within and for the body of the County of Delaware, on their oaths, in the name and by the authority of the State of Ohio, do find and present that on or about the period of March to September, 2006 in Delaware County, Ohio, DIJANA IBRAHIM,

did knowingly receive proceeds derived, directly or indirectly, from a pattern of corrupt activity as identified in Count One of the Indictment and incorporated herein as if fully rewritten, or the collection of

any unlawful debt, and did use or invest, directly or indirectly, any part of those proceeds, or any proceeds derived from the use or investment of any of those proceeds, in the acquisition of title to, or right interest, or equity in, real property, to wit: XXX9 Loch Levin, xxx8, xxx7 Royal County Down, xxx2 Grennan Woods, or in the establishment or operation of an enterprise, the same as identified in Count One of the Indictment and incorporated herein as if fully re-written,

this being in violation of Section 2923.32(A)(3) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

Count Four:

THE JURORS OF THE GRAND JURY of the State of Ohio, within and for the body of the County of Delaware, on their oaths, in the name and by the authority of the State of Ohio, do find and present that during the period of March to September, 2006, in a continuing course of conduct in Delaware County and Franklin County, Ohio, DIJANA IBRAHIM,

with the intent to conceal or disguise the fact that money or a payment instrument was the proceeds of unlawful activity as identified in the indictment and incorporated herein as if fully re-written, or to promote, manage, establish, carry on, or facilitate the promotion, management, establishment, or carrying on of unlawful activity, as identified in Count One of the Indictment and incorporated herein as if fully re-written and other offenses whether or not fully stated herein or to avoid the making or filing of a report required under Section, 1315.53, Ohio Revised Code, that contained a material omission or misstatement, did conduct or structure or attempt to conduct or structure a transaction or transactions, to wit: transfers of money among persons, entities and/or financial institutions, to wit: America's Wholesale Lender, Huntington National Bank, Citi Bank Mortgage, First Magnus Mortgage, and other persons and/or entities as identified in Count One of the indictment and incorporated herein as if fully re-written by or through one or more money transmitters, i.e., financial institutions and mortgage lenders or persons engaged in a trade or business as identified and incorporated herein as if fully re-written,

this being in violation of Section 1315.53(F)(1)(c) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

Count Five:

THE JURORS OF THE GRAND JURY of the State of Ohio, within and for the body of the County of Delaware, on their oaths, in the name and by the authority of the State of Ohio, do find and present that during the period of March to September 2006, in a continuing course of conduct in Delaware County and Franklin County, Ohio, DIJANA IBRAHIM,

did conduct or attempt to conduct a transaction or transactions as identified in Counts One through Four of the Indictment and incorporated herein as if fully re-written knowing that the property involved in the transaction was the proceeds of some form of unlawful activity as identified in the indictment and incorporated herein as if fully re-written, and other offenses whether or not fully stated herein with the purpose of committing or furthering the commission of corrupt activity, as further identified in the indictment,

this being in violation of Section 1315.55(A)(1) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

Count Six

THE JURORS OF THE GRAND JURY of the State of Ohio, within and for the body of the County of Delaware, on their oaths, in the name and by the authority of the State of Ohio, do find and present that during the period of March to September 2006, in a continuing course of conduct in Delaware County and Franklin County, Ohio, DIJANA IBRAHIM,

did conduct or attempt to conduct a transaction or transactions as identified in Counts One through Four of the indictment and incorporated

herein as if fully re-written, knowing that the property involved in the transaction was the proceeds of some form of unlawful activity, the same as identified in the indictment and other offenses whether or not fully stated herein, with the intent to disguise the nature, location, source, ownership, or control of the property or with the intent to avoid a transaction reporting requirement under Section 1315.53 of the Revised Code or federal law,

this being in violation of Section 1315.55(A)(2) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

Count Seven

THE JURORS OF THE GRAND JURY of the State of Ohio, within and for the body of the County of Delaware, on their oaths, in the name and by the authority of the State of Ohio, do find and present that during the period of March to September, 2006, in a continuing course of criminal conduct in Delaware County, Ohio, and Franklin County, Ohio, DIJANA IBRAHIM,

did conduct or attempt to conduct a transaction or transactions as identified in Counts One through Four of the indictment with the purpose to promote, manage, establish, carry on, or facilitate the promotion, management, establishment, or carrying on of corrupt activity, the same as identified in Counts One of the indictment and incorporated herein as if fully re-written,

this being in violation of Section 1315.55(A)(3) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

Count Eight

THE JURORS OF THE GRAND JURY of the State of Ohio, within and for the body of the County of Delaware, on their oaths, in the name and by the authority of the State of Ohio, do find and present that during the period of March to September, 2006,

in a continuing course of criminal conduct in Delaware County, Ohio, and Franklin County, Ohio, DIJANA IBRAHIM,

did conduct or structure or attempt to conduct a transaction or transactions as identified in Counts One through Four of the indictment and incorporated herein as if fully re-written, that involved the proceeds of corrupt activity as identified in the indictment, the value of which was greater than ten thousand dollars knowing or having reasonable cause to know that the transaction or transactions involved the proceeds of corrupt activity, as identified in the indictment and incorporated herein as if fully re-written,

this being in violation of Section 1315.55(A)(4) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

Count Nine

THE JURORS OF THE GRAND JURY of the State of Ohio, within and for the body of the County of Delaware, on their oaths, in the name and by the authority of the State of Ohio, do find and present that during the period of March 17, 2006, in a continuing course of conduct in Delaware County and Franklin County, Ohio, DIJANA IBRAHIM,

did, with purpose to defraud, or knowing that she was facilitating a fraud forge a writing to wit: a document or documents submitted to a broker, Title Company and/or American's Wholesale Lender and/or Huntington National Bank regarding the sale and purchase of XXX9 Loch Levin, Delaware, County, so that it purported to be genuine when it was actually spurious, the loss or value being \$25,000 or more,

this being in violation of Section 2913.31(A)(2) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

Count Ten

THE JURORS OF THE GRAND JURY of the State of Ohio, within and for the body of the County of Delaware, on their oaths, in the name and by the authority of the State of Ohio, do find and present that during the period of March 17, 2006, in a continuing course of conduct in Delaware County and Franklin County, Ohio, DIJANA IBRAHIM,

did, utter, or possess with purpose to utter, a writing or writings knowing such documents to have been forged, to wit: a document or documents submitted to a broker, Title Company and/or American's Wholesale Lender and/or Huntington National Bank regarding the sale and purchase of XXX9 Loch Levin, Delaware, County, the loss or value being \$25,000 or more,

this being in violation of Section 2913.31(A)(3) of the Ohio Revised Code and against the peace and dignity of the State of Ohio

Count Eleven:

THE JURORS OF THE GRAND JURY of the State of Ohio, within and for the body of the County of Delaware, on their oaths, in the name and by the authority of the State of Ohio, do find and present that during the period of August 14, 2006, in a continuing course of conduct in Delaware County and Franklin County, Ohio, DIJANA IBRAHIM,

did, with purpose to defraud, or knowing that she was facilitating a fraud forge a writing to wit: a document or documents submitted to a broker, Title Company and/or First Magnus Mortgage and Citibank Mortgage regarding the sale and purchase of XXX7 Royal County Down, Delaware, County, so that it purported to be genuine when it was actually spurious, the loss or value being \$25,000 or more,

this being in violation of Section 2913.31(A)(2) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

Count Twelve

THE JURORS OF THE GRAND JURY of the State of Ohio, within and for the body of the County of Delaware, on their oaths, in the name and by the authority of the State of Ohio, do find and present that during the period of August 14, 2006, in a continuing course of conduct in Delaware County and Franklin County, Ohio, DIJANA IBRAHIM,

did, utter, or possess with purpose to utter, a writing or writings knowing such documents to have been forged, to wit: a document or documents submitted to a broker, Title Company and/or First Magnus Mortgage and Citibank Mortgage regarding the sale and purchase of XXX7 Royal County Down, Delaware, County, the loss or value being \$25,000 or more,

this being in violation of Section 2913.31(A)(3) of the Ohio Revised Code and against the peace and dignity of the State of Ohio

Count Thirteen

THE JURORS OF THE GRAND JURY of the State of Ohio, within and for the body of the County of Delaware, on their oaths, in the name and by the authority of the State of Ohio, do find and present that during the period of September 1, 2006, in a continuing course of conduct in Delaware County and Franklin County, Ohio, DIJANA IBRAHIM,

did, with purpose to defraud, or knowing that she was facilitating a fraud

forge a writing to wit: a document or documents submitted to a broker, Title Company and/or First Magnus Mortgage and Citibank Mortgage regarding the sale and purchase of XXX2 Grennan Woods, Delaware, County, so that it purported to be genuine when it was actually spurious, the loss or value being \$25,000 or more,

this being in violation of Section 2913.31(A)(2) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

Count Fourteen

THE JURORS OF THE GRAND JURY of the State of Ohio, within and for the body of the County of Delaware, on their oaths, in the name and by the authority of the State of Ohio, do find and present that during the period of September 1, 2006, in a continuing course of conduct in Delaware County and Franklin County, Ohio, DIJANA IBRAHIM,

did, utter, or possess with purpose to utter, a writing or writings knowing such documents to have been forged, to wit: a document or documents submitted to a broker, Title Company and/or First Magnus Mortgage and Citibank Mortgage regarding the sale and purchase of XXX2 Grennan Woods, Delaware, County, the loss or value being \$25,000 or more,

this being in violation of Section 2913.31(A)(3) of the Ohio Revised Code and against the peace and dignity of the State of Ohio

Count Fifteen

THE JURORS OF THE GRAND JURY of the State of Ohio, within and for the body of the County of Delaware, on their oaths, in the name and by the authority of the State of Ohio, do find and present that during the period of March to September, 2006,

in a continuing course of conduct in Delaware County and Franklin County, Ohio,  
DIJANA IBRAHIM,

with purpose to deprive American's Wholesale Lender, Huntington National Bank, First Magnus Mortgage, Citi Bank Mortgage and others, the owners, of property or services, to wit: cash or other legal tender, did knowingly obtain or exert control over said property or services, by deception, the value of said property being greater than \$1,000,000,

this being in violation of Section 2913.02(A)(3) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

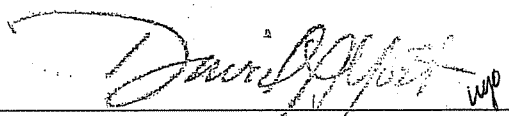
Count Sixteen:


THE JURORS OF THE GRAND JURY of the State of Ohio, within and for the body of the County of Delaware, on their oaths, in the name and by the authority of the State of Ohio, do find and present that during the period of March 2007 through September 2007, in a continuing course of conduct in Delaware County and Franklin County, Ohio,  
DIJANA IBRAHIM,

did receive, retain, or dispose of property of another, to wit: cash or other legal tender, the property of American's Wholesale Lender, Huntington National Bank, First Magnus Mortgage, Citi Bank Mortgage and others, having reasonable cause to believe that the property was obtained through commission of a theft offense and the said value of such property or services being greater than \$100,000,

this being in violation of Section 2913.51(A) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

**DAVE YOST  
PROSECUTING ATTORNEY**

  
\_\_\_\_\_  
(0056290)

By:   
\_\_\_\_\_  
ASSISTANT PROSECUTING ATTORNEY  
(0034637)

INDICTMENT FOR:

Engaging In Pattern Of  
Corrupt Activity  
Section 2923.32(A)(1) O.R.C.  
First Degree Felony

Engaging In Pattern Of  
Corrupt Activity  
Section 2923.32(A)(2) O.R.C.  
First Degree Felony

Engaging In Pattern Of  
Corrupt Activity  
Section 2923.32(A)(3) O.R.C.  
First Degree Felony

Money Laundering  
Section 1315.53(F)(1)(c) O.R.C.  
Fourth Degree Felony

Money Laundering  
Section 1315.55(A)(1) O.R.C.  
Third Degree Felony

Money Laundering  
Section 1315.55(A)(2) O.R.C.  
Third Degree Felony

Money Laundering  
Section 1315.55(A)(3) O.R.C.  
Third Degree Felony

Money Laundering

Section 1315.55(A)(4) O.R.C.  
Third Degree Felony

Forgery  
Section 2913.31(A)(2) O.R.C.  
Third Degree Felony  
Six Counts

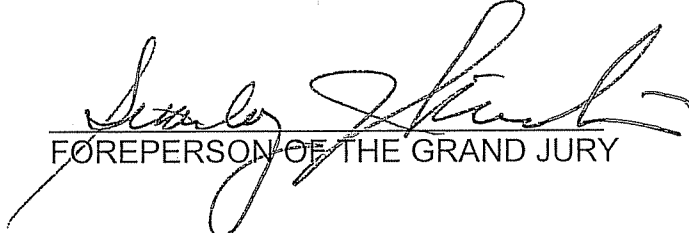
Forgery  
Section 2913.31(A)(3) O.R.C.  
Third Degree Felony

Aggravated Theft  
Section 2913.02(A)(3) O.R.C.  
First Degree Felony

Receiving Stolen Property  
Section 2913.51(A) O.R.C.  
Third Degree Felony

A TRUE BILL

This Bill of Indictment found upon testimony sworn and sent before the Grand Jury at the request of the Prosecuting Attorney.

  
FOREPERSON OF THE GRAND JURY

IN THE COURT OF COMMON PLEAS OF DELAWARE COUNTY, OHIO

THE STATE OF OHIO,

Plaintiff,

vs.

Judge W. Duncan Whitney

Case No. 08CR-I-02-0134

DIJANA IBRAHIM  
5644 Congressional Place  
Hilliard, Ohio 43026

Defendant,

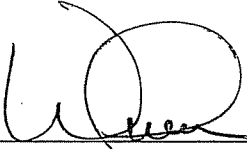
PROSECUTING ATTORNEY'S  
REQUEST FOR ISSUANCE OF  
WARRANT UPON INDICTMENT

TO: Jan Antonoplos, Clerk of Courts

DIJANA IBRAHIM has been named as a Defendant in an Indictment returned by the Delaware County Grand Jury.

Issue a Warrant to an appropriate officer and direct him to execute it upon the Defendant at the address stated in the caption of this request.

Special instructions for executing officer: None.

  
\_\_\_\_\_  
William J. Owen (0034637)  
Assistant Prosecuting Attorney

JAN ANTONOPLIOS  
CLERK

2008 FEB 29 AM 8:51

COMMON PLEAS COURT  
DELAWARE COUNTY, OHIO  
FILED