

IN THE COURT OF COMMON PLEAS OF DELAWARE COUNTY, OHIO

THE STATE OF OHIO,

Plaintiff,

vs.

MOEMEN IBRAHIM
AKA, MOEMEN KHALIL,

Defendant.

Judge W. Duncan Whitney

Case No. 08CR-I-02- **0133**

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 on or about August 17, 2006, in a continuing course of conduct in Delaware County and Franklin County, Ohio, MOEMEN IBRAHIM, AKA MOEMEN KHALIL,

with the intent to conceal or disguise the fact that money or a payment instrument was the proceeds of unlawful activity, to wit: Violations of 18 U.S.C. Section 1343, 18 U.S.C. Section 1344, R.C. Sections 2923.32(A),(B) and/or(C), 2923.13(A)(3), 2913.51, and/or other unlawful activity or to promote, manage, establish, carry on, or facilitate the promotion, management, establishment, or carrying on of unlawful activity, 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 from entities and/or financial institutions, i.e., First Magnus Mortgage and Citibank Mortgage, to persons and/or entities, i.e., G & H Home Improvement, Dreamland Home Improvement, American Remodeling, Crew Realty, Gihan Zalat, Mohamed Mohamed, Alaa Aboulenein, Wissam Ibrahim, Raid Yaish, and others by or through one or more money transmitters, or persons engaged in a trade or business,

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 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 on or about August 17, 2006, in a continuing course of conduct in Delaware County and Franklin County, Ohio, MOEMEN IBRAHIM, AKA MOEMEN KHALIL,

did conduct or attempt to conduct a transaction or transactions to wit: transfers of money from entities and/or financial institutions, i.e., First Magnus Mortgage and Citibank Mortgage, to persons and/or entities, i.e., G & H Home Improvement, Dreamland Home Improvement, American Remodeling, Crew Realty, Gihan Zalat, Mohamed Mohamed, Alaa Aboulenein, Wissam Ibrahim, Raid Yaish and others, knowing that the property involved in the transaction was the proceeds of some form of unlawful activity, to wit: Violations of 18 U.S.C. Section 1343, 18 U.S.C. Section 1344, R.C. Sections 2923.32(A),(B) and/or(C), 2923.13(A)(3), 2913.51, and/or other unlawful activity with the purpose of committing or furthering the commission of corrupt activity as identified in Section 2923.31,

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 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 August 17, 2006, in a continuing course of conduct in Delaware County and Franklin County, Ohio, MOEMEN IBRAHIM, AKA MOEMEN KHALIL,

did conduct or attempt to conduct a transaction or transactions to wit: transfers of money from entities and/or financial institutions, i.e., First Magnus Mortgage and Citibank Mortgage, to persons and/or entities, i.e.,

G & H Home Improvement, Dreamland Home Improvement, American Remodeling, Crew Realty, Gihan Zalat, Mohamed Mohamed, Alaa Aboulenein, Wissam Ibrahim, Raid Yaish and others knowing that the property involved in the transaction was the proceeds of some form of unlawful activity, to wit: Violations of 18 U.S.C. Section 1343, 18 U.S.C. Section 1344, R.C. Sections 2923.32(A),(B) and/or(C), 2923.13(A)(3), 2913.51, and/or other unlawful activity 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 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 on or about August 17, 2006, in a continuing course of conduct in Delaware County and Franklin County, Ohio, HANY BEKHIT, AKA HANY BAKHIT,

did conduct or attempt to conduct a transaction or transactions to wit: transfers of money from entities and/or financial institutions, i.e., First Magnus Mortgage and Citibank Mortgage, to persons and/or entities, i.e., G & H Home Improvement, Dreamland Home Improvement, American Remodeling, Crew Realty, Gihan Zalat, Mohamed Mohamed, Alaa Aboulenein, Wissam Ibrahim, Raid Yaish and others knowing that the property involved in the transaction was the proceeds of some form of unlawful activity, to wit: Violations of 18 U.S.C. Section 1343, 18 U.S.C. Section 1344, R.C. Sections 2923.32(A),(B) and/or(C), 2923.13(A)(3), 2913.51, and/or other unlawful activity with the purpose to promote, manage, establish, carry on, or facilitate the promotion, management, establishment, or carrying on of corrupt activity, as identified in Section 2923.31,

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 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 on or about August 17, 2006, in a continuing course of conduct in Delaware County and Franklin County, Ohio, MOEMEN IBRAHIM, AKA MOEMEN KHALIL,

did conduct or structure or attempt to conduct a transaction or transactions with persons, entities and/or financial institutions, i.e., First Magnus Mortgage and Citibank Mortgage, to persons and/or entities, i.e., G & H Home Improvement, Dreamland Home Improvement, American Remodeling, Crew Realty, Gihan Zalat, Mohamed Mohamed, Alaa Aboulenein, Wissam Ibrahim, Raid Yaish and others that involved the proceeds of corrupt activity a 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, to wit: Violations of 18 U.S.C. Section 1343, 18 U.S.C. Section 1344, R.C. Sections 2923.32(A),(B) and/or(C), 2923.13(A)(3), 2913.51, and/or other corrupt activity as identified in Section 2923.31,

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 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 on or about August 17, 2006, in a continuing course of conduct in Delaware County and Franklin County, Ohio, MOEMEN IBRAHIM, AKA MOEMEN KHALIL,

did, with purpose to defraud, or knowing that he was facilitating a fraud forge a writing to wit: a document or documents submitted to Broker, Title Company, First Magnus Mortgage, Citi Bank Mortgage, Dept. of Housing and Urban Development and others regarding the sale and purchase of XXX5 Coachmen, Delaware, County, so that it purported to be genuine when it was actually spurious, the loss or value is \$500,000 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 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 on or about August 17, 2006, in a continuing course of conduct in Delaware County and Franklin County, Ohio, MOEMEN IBRAHIM, AKA MOEMEN KHALIL,

with purpose to defraud, or knowing that he was facilitating a fraud, did utter, or possess with purpose to utter, a writing that MOEMEN IBRAHIM AKA MOEMEN KHALIL knew to have been forged, to wit: A document or documents submitted to Broker, Title Company, First Magnus Mortgage and Citi Bank Mortgage, Dept. of Housing and Urban Development, regarding the sale and purchase of XXX5 Coachmen, Delaware, County, the loss or value being \$500,000 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 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 August 17, 2006, in a continuing course of conduct in Delaware County and Franklin County, Ohio, MOEMEN IBRAHIM, AKA MOEMEN KHALIL,

with purpose to deprive First Magnus Bank and Citi Bank, 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 \$500,000 or more but less than \$1,000,000,

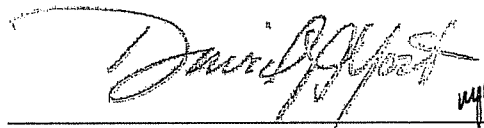
this being in violation of Section 2913.02(A)(3) of the Ohio Revised Code and against the peace and dignity of the State of Ohio.

Count Nine:

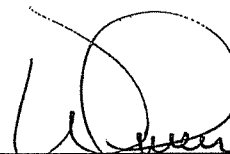
THE JURORS OF THE GRAND JURY of the State of Ohio, within and for the body of the County of Delaware, on their oaths, in the name and by the authority of the State of Ohio, do find and present that during the period of August 17, 2006, in a continuing course of conduct in Delaware County and Franklin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

did receive, retain, or dispose of property of another, to wit: cash or other legal tender, the property of First Magnus Mortgage and Citi Bank Mortgage, having reasonable cause to believe that the property was obtained through commission of a theft offense and the 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:

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

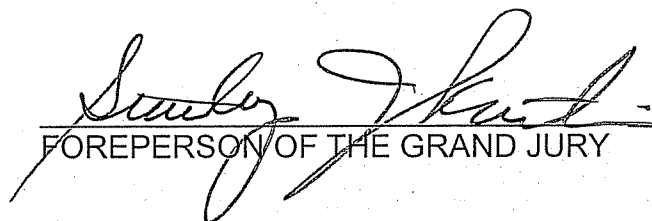
Forgery
Section 2913.31(A)(3) O.R.C.
Third Degree Felony

Aggravated Theft
Section 2913.02(A)(3) O.R.C.
Third 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.

Case No. 08CR-I-02-0133

Judge W. Duncan Whitney

MOEMEN IBRAHIM
7453 Ratchford Court
New Albany, Ohio 43054

Defendant,

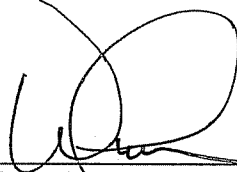
PROSECUTING ATTORNEY'S
REQUEST FOR ISSUANCE OF
WARRANT UPON INDICTMENT

TO: Jan Antonoplos, Clerk of Courts

MOEMEN 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