

NELSON P. COHEN  
UNITED STATES ATTORNEY

KAREN L. LOEFFLER  
Assistant U.S. Attorney  
Federal Building & U.S. Courthouse  
222 West Seventh Avenue, Room 253, #9  
Anchorage, Alaska 99513-7567  
Phone: (907) 271-5071  
Fax: (907) 271-1500  
Email: karen.loeffler@usdoj.gov

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ALASKA

UNITED STATES OF AMERICA,	)	No. 3:06-cr-0070
	)	
Plaintiff,	)	<u>COUNT 1:</u>
	)	CONSPIRACY
vs.	)	Vio. 18 U.S.C. § 371
	)	
AZEM LIMANI, BEKIM HASIPI,	)	<u>COUNT 2:</u>
ROBIN DORMAN, DZEVID LIMANI,	)	BANK FRAUD
AGIM DELOLLI, JAN MARQUISS,	)	Vio. 18 U.S.C. §1344(2)
and KOUROSH PARTOW	)	
	)	<u>COUNTS 3 -15, 20:</u>
Defendants.	)	WIRE FRAUD
	)	Vio. 18 U.S.C. § 1343
	)	
	)	<u>COUNTS 16 - 19:</u>
	)	FALSE STATEMENTS TO
	)	FINANCIAL INSTITUTION
	)	Vio. 18 U.S.C. § 1014
	)	
	)	<u>COUNTS 21 - 39:</u>
	)	ENGAGING IN MONETARY
	)	TRANSACTIONS IN
	)	CRIMINALLY DERIVED
	)	PROPERTY
	)	Vio. 18 U.S.C. § 1957

---

FIRST SUPERSEDING INDICTMENT

The Grand Jury charges that:

General Allegations

At all times material to this indictment:

1. First National Bank of Alaska (“FNBA”) and IndyMac were insured banks and financial institutions as that term is defined in Title 31 United States Code §5312(a)(2).

2. Countrywide Home Loans (“Countrywide”), Argent Mortgage Company (“Argent”), and Ameriquest Mortgage Company (“Ameriquest”) were companies engaged in the business of mortgage lending with offices located in California. Alyeska Title Guaranty Agency (“Alyeska Title”) and Attorney’s Guaranty Title Agency (“Attorney’s Title”) were companies engaged in the business of real estate closings and settlements. Thus, Countrywide, Argent and Ameriquest, Alyeska Title and Attorney’s Title are financial institutions as that term is defined in Title 31 United States Code §5312(a)(2). Countrywide, Argent and Ameriquest each provide funds for closing on mortgage loans by wiring said funds from outside the State of Alaska to the title company in Alaska.

3. From approximately 2002 and continuing until the present, Azem Limani (“LIMANI”) has owned or operated several businesses in Anchorage, Alaska. These include Alaska Super Pawn, LRD Investments, Limani Rentals and H and L Investments. At sometime in 2003, LIMANI sold Alaska Super Pawn to BEKIM HASIPI. At differing

times during the period of this indictment BEKIM HASIPI, ROBIN DORMAN and DZEVID LIMANI worked for LIMANI in one or more of the above listed businesses.

4. KOUROSH PARTOW was a branch manager and loan officer working for Countrywide Home Loans' ("Countrywide") Anchorage branch office. As a loan officer he was responsible for arranging financing for real estate transactions. As a loan officer, PARTOW would meet with the borrower and gather the information necessary to fill out the loan application form. At Countrywide, the vast majority of his compensation derived from commissions based on the amount of the loan transaction.

#### COUNT 1: CONSPIRACY

5. Paragraphs 1 - 4 are realleged herein.

6. Beginning at some time unknown, but at least by on or about April 2002, and continuing thereafter until May 2006, the exact dates being unknown to the grand jury, the defendants, AZEM LIMANI, KOUROSH PARTOW, BEKIM HASIPI, DZEVID LIMANI, JAN MARQUISS, AGIM DELOLLI, Person A and ROBIN DORMAN and others known and unknown to the grand jury, in the District of Alaska and elsewhere, did unlawfully, and knowingly, combine, conspire, confederate and agree, with each other, to commit certain offenses against the United States, namely:

A. Bank Fraud in violation of Title 18, United States Code, Section 1344(2);

B. False Statements to Bank in violation of Title 18, United States Code, Section 1014;

C. Wire Fraud in violation of Title 18, United States Code, Section 1343; and

D. Engaging in Monetary Transactions in Criminally Derived Property in violation of Title 18, United States Code, Section 1957.

#### PURPOSE OF THE CONSPIRACY

7. The purpose of the conspiracy was for LIMANI, with the help of PARTOW, on the Countrywide loans, and the co-conspirators named above to obtain financing for the purchase of residential real estate in Anchorage, Alaska from various financial institutions and mortgage companies through a pattern of providing false and fraudulent statements and documents, use of inflated income, use of nominee borrowers and purchasers and other fraudulent actions with the result of concealing from said organizations the defendant borrowers' true financial circumstances, the purposes and nature of the loans, and the co-conspirators relationships with each other. LIMANI and other co-conspirators would then sell the properties purchased with the fraudulently obtained loans, in some instances to each other through the use of other fraudulently obtained loans and in some instances to third party buyers, retaining the profits of the sales for the benefit of LIMANI and the other co-conspirators. PARTOW would receive commissions on the closing of the fraudulently obtained loans.

MANNER AND MEANS

8. The manner and means by which the conspiracy was carried out included, among other things, providing false and fraudulent documents and statements to various lenders, providing inflated statements of the borrowers' income, bank accounts and assets, providing verification of false documentation and using nominee borrowers and purchasers— that is, misstating the true purpose, purchaser and/or borrower by having one co-conspirator act as a nominee, or stand in, for LIMANI who was the true beneficiary of the financial transaction. As a result of the conspiracy the defendants were able to obtain financing, refinancing, cash out refinancing and sales of residential real estate properties in Anchorage, Alaska in a manner that permitted them to obtain the profits of their venture with, in many cases, no personal investment of funds. PARTOW was further able to obtain commissions on the closing of loans that he knew to be fraudulent. A further result of the conspiracy was to place all market risk on the financial institutions and preclude said institutions from the ability to make informed decisions about their loans.

9. In furtherance of the conspiracy, the defendants obtained loans from two banks and three mortgage companies. As part of the conspiracy, they obtained at least 15 loans involving the purchase and/or refinancing of 14 separate properties located in Anchorage, Alaska.

10. It was a part of the conspiracy that beginning sometime in 2002, LIMANI obtained a series of loans from FNBA, including a number of unsecured loans. In support

of the loans, LIMANI provided FNBA with documents purporting to be his tax returns for the tax years 2000 and 2001. In fact, the 2000 tax return provided by LIMANI substantially overstated his gross receipts from Alaska Super Pawn and his gross, adjusted and net income as shown by the amended tax return he later filed with the Internal Revenue Service (“IRS”). LIMANI further provided FNBA with a document that purported to be his 2001 tax return. That document was never filed with the IRS. It also substantially overstated his gross receipts and gross, adjusted and net income as shown by the actual tax return he later filed with the IRS. At the time that Limani provided FNBA with his purported 2001 tax return he was working with different accountants to amend his previous return and create an actual 2001 return to be filed with the IRS. Limani never informed FNBA of the actual documents filed with the IRS, nor the fact that his actual returns showed significantly less income than the ones he provided to FNBA in support of his loans.

11. It was further a part of the conspiracy that between June 28, 2002, and July 2, 2002, BEKIM HASIPI and LIMANI arranged for a nominee purchase and loan on property located at 1343 Chirikof Court, Anchorage, Alaska. The purchase was financed through a loan at FNBA. HASIPI acted as a nominee purchaser for LIMANI by executing a quit claim deed on the property to LIMANI before he purchased the property. HASIPI then obtained a loan from FNBA for \$175,000 for the purchase of the property. The actual purchase price of the property was \$160,000. LIMANI then filed the quit claim deed and later refinanced the FNBA loan with a loan at another mortgage company.

12. It was further a part of the conspiracy that in April and May 2002, LIMANI submitted three loan applications for the purchase of three residential properties in Anchorage, Alaska to IndyMac, with each application falsely stating that no part of the down payment for the loan was borrowed. In fact, in each case, the down payment derived from a loan from FNBA.

13. It was further a part of the conspiracy that in October 2002, LIMANI applied for and obtained a loan in the amount of \$174,250 from Ameriquest. The purpose of the loan was to purchase property located at 4840 Leah Court, Anchorage, Alaska. In support of the loan, LIMANI provided a handwritten statement falsely stating that his net income from Alaska Super Pawn for 2002 year to date was \$193,266 and that he had approximately \$15,000 in monthly income. LIMANI's statement of income from Alaska Super Pawn substantially overstated his net income from the business. His down payment for the purchase came from a loan at FNBA.

14. It was further a part of the conspiracy that on June 13, 2003, LIMANI arranged to sell the property located at 4840 Leah Court to Person A. Person A obtained a loan from Countrywide. In support of his loan request, Person A provided false information to Countrywide, concealing the fact that he acted as a nominee purchaser for LIMANI in that LIMANI provided the down payment for the purchase, made all the subsequent mortgage payments on the loan and obtained the proceeds from the subsequent resale of the property.

15. It was a further part of the conspiracy that in April 2003, LIMANI applied

for and obtained a loan in the amount of \$375,250 from Argent. The purpose of the loan was to refinance a previous loan at Ameriquest that had been used to refinance earlier loans related to the purchase of LIMANI's residence at 11200 Briggs Court, Anchorage, Alaska. In support of the loan, LIMANI provided signed documentation falsely stating that his monthly income, as listed on his loan application, included \$38,000 from Alaska Super Pawn and rental properties that netted \$64,779.50. In fact, said statements substantially overstated his income and earnings.

16. It was further a part of the conspiracy that in May 2003, LIMANI applied for and obtained a loan in the amount of \$441,000 from Argent. The purpose of the loan was to refinance a previous loan from Countrywide that had been used to pay off a construction loan from FNBA for property located at 2000 Hillcrest Circle, Anchorage, Alaska. In support of the loan, LIMANI provided the same signed documentation used to support his Argent loan for the Briggs Court purchase. LIMANI's loan application listed monthly income of \$38,000 from Alaska Super Pawn but further falsely stated that he had net monthly rental income of \$85,287.30 for a total monthly income of \$123,287.30. In fact, said statements substantially overstated his income and earnings.

17. It was further a part of the conspiracy that in or about January 2004, JAN MARQUISS applied for and obtained a loan in the amount of \$480,000 from Countrywide. The purpose of the loan was to refinance a loan from FNBA that was used to purchase a property located at 2683 Wesleyan Drive, Anchorage, Alaska. According to the loan application, the property was to be MARQUISS' primary residence. In support of

the loan, PARTOW caused the application to falsely state that MARQUISS had monthly income of \$19,300 and \$500,000 in a checking account at Key Bank. PARTOW further caused the loan papers to falsely state that none of the money for the purchase was to be borrowed. In fact, said income statements significantly overstated Marquiss' income and assets as MARQUISS and PARTOW well knew. In addition, MARQUISS did not purchase the property as a primary residence but acted as a nominee purchaser for LIMANI. LIMANI made the loan payments on the property and obtained the proceeds of the subsequent sale of the property.

18. It was further a part of the conspiracy that in April 2004, DZEVID LIMANI applied for and obtained a loan in the amount of \$243,000 from Countrywide. The purpose of the loan was to purchase property located at 12387 Division Street, Anchorage, Alaska as a primary residence. According to the loan papers, DZEVID LIMANI was purchasing the property from ROBIN DORMAN. In the loan application, DZEVID LIMANI falsely listed the source of his down payment as savings and checking. PARTOW further caused the loan papers to falsely state that DZEVID LIMANI made \$12,200 per month as a manager of Alaska Super Pawn and had savings in an account at FNBA of \$200,000. In fact, said statements significantly overstated DZEVID LIMANI's income and assets.. Further, contrary to his loan application, the down payment for the purchase came from AZEM LIMANI who signed for DORMAN as the seller and thereafter made the mortgage payments on the loan, thus, using DZEVID LIMANI as a nominee purchaser. The proceeds of the sale of this property were then used by

DORMAN as part of the down payment on the property located at 12363 Division St. detailed below. In addition, approximately \$15,000 from the proceeds of the sale of the property were provided to LIMANI by DORMAN.

19. It was further a part of the conspiracy that in April 2004, ROBIN DORMAN applied for and obtained a loan in the amount of \$247,500 from Countrywide. The purpose of the loan was stated to be the purchase of a primary residence located at 12363 Division Street, Anchorage, Alaska. In support of the loan, DORMAN falsely stated that she had worked as an office manager for H and L Investments for 2 years and made \$5,300 per month. She further falsely claimed to have \$63,000 in two FNBA accounts and falsely stated that the down payment for the property would come from her savings/checking accounts. In fact, approximately \$8,288.20 of the down payment paid by DORMAN was provided by LIMANI. The rest of the down payment came from the sale of the property located at 12387 Division St. that was sold by DORMAN to DZEVID LIMANI. \$50,664.77 of the proceeds from the sale of the property were provided to AZEM LIMANI through LRD Investments. DORMAN's income statements substantially overstated her income.

20. It was further a part of the conspiracy that in or about May 2004, BEKIM HASIPI applied for and obtained a loan in the amount of \$247,500 from Countrywide. The purpose of the loan was to purchase property located at 12371 Division Street from JAN MARQUISS as a primary residence. In support of the loan, PARTOW caused the loan papers to falsely state that HASIPI had monthly income of \$9,800 and \$48,000 in a savings account at FNBA. In fact, said income statements significantly overstated

HASIPI's income and assets. In addition, the transaction involved a nominee sale and purchase for LIMANI who thereafter made the majority of the loan payments and obtained all of the proceeds from the sale through LRD Investments, with the exception of fees and mortgage lender pay offs.

21. It was further a part of the conspiracy that in or about October 2004, ROBIN DORMAN applied for and obtained a loan in the amount of \$256,000 from Countrywide. The purpose of the loan was stated to be for the purchase of property located at 1743 Minerva Way, Anchorage, Alaska as a primary residence. In support of the loan, DORMAN falsely stated that she had monthly income of \$6,800 made up of \$1,300 from part time employment and \$5,500 from H and L Investments and that she had \$45,000 in a checking account at "AK USA". DORMAN further falsely stated that none of the money for the purchase was to be borrowed. In fact, said income statements significantly overstated DORMAN's income. Further, LIMANI supplied the down payment for the loan and falsely verified DORMAN's income when contacted by a representative of Countrywide.

22. It was further a part of the conspiracy that in or about October 2004, AGIM DELOLLI applied for and obtained a loan in the amount of \$318,900 from Countrywide. The purpose of the loan was stated to be for the purchase of property located at 10541 Rezanof Circle, Anchorage, Alaska as a primary residence. In support of the loan, PARTOW caused the loan papers to falsely state that DELOLLI had monthly income of \$24,000 and \$100,000 located in a savings account at Wells Fargo Bank. In fact, said

loan application, signed by DELOLLI significantly overstated DELOLLI's income and assets. LIMANI supplied the down payment for the purchase. Subsequently, when DELOLLI sold the property to JAN MARQUISS, LIMANI obtained approximately \$73,000 from the proceeds of the sale.

23. It was further a part of the conspiracy that in or about August 2005, AGIM DELOLLI applied for and obtained a loan in the amount of \$202,500 from Countrywide. The stated purpose of the loan was to purchase property located at 6710 Reedyke Circle, Anchorage, Alaska as a primary residence. In support of the loan, PARTOW caused the loan application to falsely state that DELOLLI had monthly income of \$15,000 from Agim's Auto Enterprises and that DELOLLI had \$45,000 in a savings account at Wells Fargo Bank. In fact, said loan application, signed by DELOLLI significantly overstated DELOLLI's income and assets. In addition, LIMANI paid some of the fees used to make the purchase and DELOLLI acted as a nominee purchaser for DORMAN, who made all of the subsequent mortgage payments and lived at 6710 Reedyke as her primary residence.

24. It was further a part of the conspiracy that in or about May 2005, Person B a person known to the grand jury, applied for and obtained two loans from Countrywide in the amounts of \$440,000 and \$55,000. The stated purpose of the loans was to purchase property located at 11200 Briggs Court, Anchorage, Alaska from LIMANI as a primary residence. In support of the loan, PARTOW caused the loan application to falsely state that Person B had monthly income of \$15,000 and \$585,000 in accounts at FNBA. In

fact, said loan application, significantly overstated Person B's income and assets.

Further, the alleged sale's actual purpose was to provide funds to LIMANI who continued to live at 11200 Briggs Court and make all of the subsequent loan payments.

25. It was further a part of the conspiracy that on or about May 11, 2006, Person C, a person known to the grand jury, applied for a loan at Countrywide at LIMANI's request. The loan application was for the amount of \$192,000. The stated purpose of the loan was to purchase property located at 4149 S. Timberland Loop, Wasilla, Alaska, Alaska from LIMANI as a primary residence. In support of the loan, PARTOW caused the loan application to falsely state that Person C had monthly income of \$ 8,900 and \$32,000 in an account at FNBA. PARTOW further caused the loan application to state that a cash down payment was being held by "Dzevid Alimi" – a fictitious person. In fact, said loan application, significantly overstated Person C's income and assets. Further, the alleged sale's actual purpose was to provide funds to LIMANI. The loan did not close as PARTOW was asked to leave employment with Countrywide before it could close.

26. As a result of the conspiracy to date, the defendant borrowers have obtained at least \$750,000 in profits from the sale of properties in addition to the properties currently owned by the defendants.

#### Overt Acts

27. In furtherance of the conspiracy, and in order to effect the objects thereof, the defendants committed numerous overt acts within the District of Alaska, including but not limited to the following:

1

On June 28, 2002, BEKIM HASIPI signed a quit claim deed quit claiming the property located at 1343 Chirikof Court to LIMANI. HASIPI then arranged to purchase the property as a nominee borrower for LIMANI.

2

On October 23, 2002, LIMANI obtained a loan from Ameriquest for the purpose of purchasing property located at 4840 Leah Court. In support of his loan request he fraudulently overstated his income.

3

On June 13, 2003, LIMANI and Person A arranged for Person A to obtain a loan from Countrywide for the purpose of arranging a nominee purchase of property located at 4840 Leah Court from LIMANI.

4

On April 1, 2003, LIMANI obtained a loan from Argent for the purpose of refinancing a previous loan on property located at 11200 Briggs Ct. In support of his loan request he fraudulently overstated his income.

5

On May 17, 2003, LIMANI obtained a loan from Argent for the purpose of refinancing a previous loan on property located at 2000 Hillcrest Circle. In support of his loan request he fraudulently overstated his income.

6

On January 28, 2004, JAN MARQUISS obtained a loan from Countrywide for the purpose of refinancing a previous loan on property located at 2683 Wesleyan Dr. MARQUISS acted as a nominee purchaser for LIMANI, and PARTOW and MARQUISS fraudulently overstated MARQUISS' income and assets in his loan application.

7

On April 10, 2004, DZEVID LIMANI obtained a loan from Countrywide for the purpose of purchasing property located at 12387 Division St. from ROBIN DORMAN. PARTOW and DZEVID LIMANI fraudulently overstated DZEVID LIMANI's income in the loan application. DZEVID LIMANI acted as a nominee purchaser for LIMANI who also received some of the proceeds of the purchase from ROBIN DORMAN.

8

On April 21, 2004, ROBIN DORMAN obtained a loan from Countrywide for the purpose of purchasing property located at 12363 Division St. DORMAN fraudulently overstated her income in the loan application and provided LIMANI with most of the proceeds from the purchase of the property.

9

On May 6, 2004, BEKIM HASIPI obtained a loan from Countrywide for the purpose of purchasing property located at 12371 Division St. PARTOW and HASIPI fraudulently overstated HASIPI's income in the loan application. HASIPI acted as a nominee purchaser for LIMANI.

10

On October 25, 2004, ROBIN DORMAN obtained a loan from Countrywide for the purpose of purchasing property located at 1743 Minerva Way. DORMAN fraudulently overstated her income in the loan application and falsely stated that the down payment was not borrowed, when in fact LIMANI provided the down payment for the loan.

11

On October 28, 2004, AGIM DELOLLI obtained a loan from Countrywide for the purpose of purchasing property located at 10541 Rezanof Circle. PARTOW caused the loan application to fraudulently overstate DELOLLI's income and assets.

12

On or about February 2, 2005, JAN MARQUISS obtained loans in the amount of \$520,000 and \$65,000 from Countrywide for the purported purchase of property located at 10541 Rezanof Circle as a primary residence. PARTOW caused the loan application to fraudulently overstate MARQUISS' income and assets. MARQUISS never resided at this location as his primary residence. LIMANI received approximately \$73,000 from the proceeds of the sale of said property from DELOLLI to MARQUISS.

13

On or about May 29, 2005, Person B obtained a 2 loans from Countrywide in the total amount of \$495,000 for the purported purchase of property located at 11200 Briggs Court from LIMANI as a primary residence. PARTOW caused the loan application to

16

fraudulently overstate Person B's income and assets. PARTOW and LIMANI fraudulently concealed the fact that the loan was not a true purchase, but a concealed cash out refinance by LIMANI.

14

On or about August 23, 2005, AGIM DELOLLI obtained a loan from Countrywide in the amount of \$202,500 for the purported purchase of property located at 6710 Reedyke Circle as a primary residence. PARTOW caused the loan application to fraudulently overstate DELOLLI's income and assets. DELOLLI fraudulently concealed the fact that he acted as a nominee purchaser for ROBIN DORMAN.

15

On or about May 11, 2006, at LIMANI's request Person C attempted to obtain a loan from Countrywide in the amount of \$192,000 for the purported purchase of property located at 4149 Timberland Loop, Wasilla, Alaska. PARTOW caused the loan application to falsely state Person C's income and assets and falsely recite a down payment held by a fictitious individual.

All of which is in violation of Title 18, United States Code, Section 371

COUNTS 2 - 15: BANK AND WIRE FRAUD

28. Paragraphs 1 - 4 and 7 - 26 are realleged and incorporated herein.

29. Beginning at a date unknown but at least on or about February 2002, and continuing thereafter until May 2006, the exact dates being unknown to the grand jury, the defendants AZEM LIMANI, KOUROSH PARTOW, BEKIM HASIPI, ROBIN

DORMAN, DZEVID LIMANI, and JAN MARQUISS and others known and unknown to the Grand Jury, in the District of Alaska, knowingly executed and attempted to execute a material scheme and artifice to obtain moneys, funds, credits and assets owned by and under the custody and control of FNBA and IndyMac and money and property of Countrywide, Argent and Ameriquest by means of material false and fraudulent pretenses, representations and promises.

30. The substance of the scheme and its manner and means are described in the description of the conspiracy set forth in paragraphs 6 - 26 of the Indictment and are realleged herein as noted above. On or about the dates set forth below, for the purpose of executing and attempting to execute the above described scheme and artifice, the defendants, did knowingly cause to be transmitted in interstate commerce by means of a wire communication certain signals and sounds, to wit: funds wire transferred at the closing of each real estate transaction, with each execution of the bank fraud scheme and each wiring, alleged as separate and distinct counts as identified by count, defendant charged, property and lender and date of wiring below:

<u>Count</u>	<u>Defendant[s] Charged</u>	<u>Property Involved/Lender</u>	<u>Wiring/Date</u>	<u>Statute</u>
2	Azem Limani Bekim Hasipi	1343 Chirikof Court/ FNBA	July 2, 2002	18 U.S.C. §1344(2)
3	Azem Limani	4840 Leah Court/Ameriquest	10/23/2002	18 U.S.C. §1343
4	Azem Limani	4840 Leah Court/ Countrywide	6/23/2003	18 U.S.C. §1343

5	Azem Limani	11200 Briggs Ct./ Argent	4/1/2003	18 U.S.C. §1343
6	Azem Limani	2000 Hillcrest/Argent	5/17/2003	18 U.S.C. §1343
7	Jan Marquiss Azem Limani Kourosh Partow	2683 Wesleyan Dr./Countrywide	1/28/2004	18 U.S.C. §1343
8	Dzevid Limani Azem Limani Robin Dorman Kourosh Partow	12387 Division St./Countrywide	4/10/2004	18 U.S.C. §1343
9	Robin Dorman Azem Limani	12363 Division St./Countrywide	4/21/2004	18 U.S.C. §1343
10	Bekim Hasipi Azem Limani Kourosh Partow	12371 Division St./Countrywide	5/6/2004	18 U.S.C. §1343
11	Robin Dorman Azem Limani	1743 Minerva Way/Countrywide	10/25/2004	18 U.S.C. §1343
12	Agim Delolli Azem Limani Kourosh Partow	10541 Rezanof Circle Countrywide	10/28/04	18 U.S.C. §1343
13	Jan Marquiss Azem Limani Kourosh Partow	10541 Rezanof Circle Countrywide	2/2/2005	18 U.S.C. §1343
14	Kourosh Partow Azem Limani	11200 Briggs Court Countrywide	5/29/2005	18 U.S.C. §1343

15	Agim Delolli	6710 Reedyke	8/23/2005	18 U.S.C. §1343
	Robin Dorman	Circle		
	Kourosh	Countrywide		
	Partow			

All of which is in violation of Title 18, United States Code, Sections 1344(2) and 1343 as separately detailed above and section 2.

#### COUNTS 16 - 18: FALSE STATEMENTS

31. IndyMac is a federally chartered savings bank with a main office located in Pasedena, California. In 2002, IndyMac had a loan program permitting what was called no income loans. Under this program borrowers could obtain loans without proof of income where the borrowers had an excellent credit score, they were purchasing real estate with an 80 percent loan to value ratio and invested their own equity in the other 20 percent of the purchase price.

32. In or about April and May 2002, in the District of Alaska, the defendant, AZEM LIMANI, knowingly made false statements for the purpose of influencing the action of IndyMac, a federally chartered savings bank, in that LIMANI submitted three loan applications each for the purchase of certain residential property in Anchorage, Alaska with each application falsely stating that no part of the down payment for the loan was borrowed, when, in truth and fact, as LIMANI well knew, these statements were false as the down payment in each case derived from a loan from FNBA. As detailed below each application is alleged as a separate and distinct count.

<u>Count</u>	<u>Date of Loan Application</u>	<u>Property to be Purchased</u>
16	May 9, 2002	438 Pine St.
17	May 9, 2002	127 W. 22 <sup>nd</sup> Ave. #503
18	April 11, 2002	2675 Wesleyan Dr.

All of which is in violation of Title 18, United States Code, Section 1014.

#### COUNT 19: FALSE STATEMENTS

33. Beginning in 2002, Limani obtained a series of loans from FNBA, including a series of unsecured loans. In order to obtain the loans Limani provided FNBA with yearly tax returns and other financial information. Limani provided a copy of his 2000 tax return dated December 12, 2001, to FNBA. This return showed gross receipts from Alaska Super Pawn of \$1,725,000, and gross income of \$436,734.50 with net profits of \$173,983.42 and an adjusted gross income of \$169,820.25. At the time LIMANI provided the document to FNBA it had not been filed with the IRS and was not filed until April 2002. Limani subsequently hired a different tax preparer and filed an amended return with the IRS. That return showed substantially less amounts for gross receipts, gross income and net profit. In addition, the amended return showed a gross loss for Limani of \$70,266. LIMANI continued to obtain loans from FNBA after the date of his amended return but never provided this return to the bank..

34. In December 2002, LIMANI provided a copy of what purported to be his 2001 tax return for the tax year 2001 to FNBA. At the time that LIMANI provided this document to FNBA, he had already hired a second accounting firm to amend his previous return and prepare his actual 2001 tax return. The purported return provided to FNBA

showed gross receipts for Alaska Pawn of \$1,879, 013, gross income of \$379,961 and net profit of \$195,936. Limani's return, as provided to FNBA also showed adjusted gross income of \$215,496. The 2001 return provided to FNBA was never filed with the IRS. Instead, Limani's actual return showed gross receipts for Alaska Super Pawn, and gross income of substantially less than that reported to the bank. His actual return showed a and a net loss for Alaska Super Pawn and an adjusted gross loss. Limani obtained 2 loans for a total amount of \$170,000 from FNBA based on the fraudulent 2001 tax return provided to the bank.

35. On or about December 31, 2002, in the District of Alaska, the defendant, AZEM LIMANI, knowingly made false statements for the purpose of influencing the action of FNBA, a federally chartered savings bank, in that LIMANI provide the bank a fraudulent tax return when, as LIMANI well knew, the tax return and the figures contained in the tax return were not true representations of his actual tax information.

All of which is in violation of Title 18, United States Code, Section 1014.

#### COUNT 20: WIRE FRAUD

36. Paragraphs 2 is realleged herein.

37. In 2005, JAN MARQUISS and KOUROSH PARTOW, in the District of Alaska devised and intended to devise a material scheme to obtain money and property from Countrywide by material false and fraudulent pretenses, representations and promises.

38. The scheme involved fraudulently overstating MARQUISS' income to

obtain a loan as follows: On or about September 2005, MARQUISS applied for a loan for \$203,000 from Countrywide. The purpose of the loan was to provide funds to refinance property located at 20129 Upper Bowery as a primary residence. In support of his loan request PARTOW caused the loan application to falsely state that MARQUISS had monthly income of \$25,000 which statement significantly overstated MARQUISS income.

39. On or about September 20, 2005, in the District of Alaska and elsewhere, the defendants, KOUROSH PARTOW and JAN MARQUISS, for the purpose of executing and attempting to execute the above described scheme to obtain money under false and fraudulent pretenses, did knowingly cause to be transmitted in interstate commerce by means of a wire communication certain signals and sounds, to wit: funds wire transferred at the closing of the loan to refinance 20129 Upper Bowery Lane, Chugiak, Alaska.

All of which is in violation of Title 18, United States Code, Section 1343 and 2.

COUNTS 21 -39: ENGAGING IN MONETARY TRANSACTIONS IN  
CRIMINALLY DERIVED PROPERTY

40. Paragraphs 1-3 and 6-25 are realleged herein.

41. On or about the dates set forth below, in the District of Alaska, the defendants, AZEM LIMANI, BEKIM HASIPI, ROBIN DORMAN, DZEVID LIMANI, AGIM DELOLLI, and JAN MARQUISS, aiding and abetting each other, did knowingly engage and attempt to engage in a monetary transaction by, through or to a financial institution, affecting interstate or foreign commerce, in criminally derived property of a

value greater than \$10,000 by depositing checks representing the proceeds of the sales of properties, said properties having been purchased through the use of fraudulently obtained loans as detailed in counts 2 -15 above. That is, defendants caused the deposit, withdrawal, or exchange of funds or monetary instruments, such property having been derived from the specified unlawful activity of bank fraud and mail fraud with each monetary transaction identified below by date, transaction and amount alleged as a separate and distinct count.

<u>Count</u>	<u>Defendant</u>	<u>Monetary Transaction/Amount</u>	<u>Date</u>
21	Azem Limani	Check for \$138,783 from Alyeska Title to FNBA for the refinance of property located at 1343 Chirikof Court derived from fraudulently obtained loan described in Count 2	3/11/03
22	Azem Limani	Check for \$34,146.57 issued to Azem Limani by Attorneys Title, representing proceeds of sale of property located at 4840 Leah Court derived from fraudulently obtained loan described in Count 3.	6/13/2003
23	Azem Limani	Wire transfer of \$183,283 from Attorney's Title to Ameriquest representing proceeds of sale of property located at 4840 Leah Court derived from fraudulently obtained loan described in Count 3.	6/13/2003
24	Azem Limani	Check for \$18,822.67 issued to Azem Limani by Alyeska Title representing proceeds from sale of property located at 4840 Leah purchased through, fraudulently obtained loan described in Count 4	7/30/2004
25	Azem Limani	Wire transfer of \$214,260.24 from Alyeska Title to Countrywide representing proceeds from sale of property located at 4840 Leah purchased through fraudulently obtained loan described in Count 4	7/30/2004

26	Azem Limani	Wire transfer of \$380,777.71 from Alyeska Title to Countrywide representing proceeds of sale of property located at 11200 Briggs Court purchased through fraudulently obtained loan described in Count 5.	5/25/2005
27	Azem Limani	Check for \$17,828.46 from Alyeska Title to Azem Limani representing proceeds of sale of property located at 11200 Briggs Court purchased through fraudulently obtained loan described in Count 5.	5/25/2005
28	Azem Limani	Wire transfer of \$437,686.74 from Alyeska Title to Ameriquest representing proceeds of sale of property located at 2000 Hillcrest purchased through fraudulently obtained loan described in Count 6.	11/11/2004
29	Azem Limani Jan Marquiss	Check for \$88,173.77 from Alyeska Title to Azem Limani representing proceeds of sale of property located at 2683 Wesleyan Dr. purchased through fraudulently obtained loan described in Count 7	12/29/2004
30	Azem Limani Jan Marquiss	Wire transfer of \$474,168.93 from Alyeska Title to Countrywide representing proceeds of sale of property located at 2683 Wesleyan Dr. purchased through fraudulently obtained loan described in Count 7	12/29/2004
31	Azem Limani Jan Marquiss	Wire transfer of \$58,824 from Alyeska Title to Countrywide representing proceeds of sale of property located at 2683 Wesleyan Dr. purchased through fraudulently obtained loan described in Count 7	12/29/2004
32	Azem Limani Dzevid Limani Robin Dorman	Check for \$53,847.61 issued to Robin Dorman by Alyeska Title representing proceeds of purchase of property located at 12387 Division St. purchased through fraudulently obtained loan described in Count 8	4/13/2004

- |    |  |   |           |
|----|--|---|-----------|
| 33 | Azem<br>Limani<br>Robin<br>Dorman                    | Deposit of Check no. 1110 for \$15,000 in to Alaska USA Federal Credit Union, a financial institution, Bank Account no. 856594 written by Robin Dorman to Azem Limani for representing proceeds of purchase of property located at 12387 Division St. purchased through fraudulently obtained loan described in Count 8 | 4/13/2004 |
| 34 | Robin<br>Dorman<br>Azem<br>Limani                    | Check to LRD Investments for \$50,664.77 issued by Alyeska Title representing proceeds of purchase of property located at 12363 Division St. purchased through fraudulently obtained loan described in Count 9  | 4/22/2004 |
| 35 | Robin<br>Dorman<br>Azem<br>Limani                    | Check no. 1117 written on account no. 847504 at Alaska USA Federal Credit Union, a financial institution, by Robin Dorman for \$14,600, which represented proceeds of sale of property located at 12363 Division St. purchased through fraudulently obtained loan described in Count 9                                  | 4/12/2004 |
| 36 | Bekim<br>Hasipi<br>Azem<br>Limani                    | Check to LRD Investments for \$34,664.08 issued by Alyeska Title representing proceeds from the purchase of property located at 12371 Division St purchased through fraudulently obtained loan described in Count 10  | 5/07/2004 |
| 37 | Agim<br>Delolli<br>Azem<br>Limani<br>Jan<br>Marquiss | Check to Azem Limani for \$48,587.95 issued by Alyeska Title representing proceeds from the sale of property located at 10541 Rezanof Circle purchased through fraudulently obtained loan described in Count 12   | 2/3/2005  |
| 38 | Agim<br>Delolli<br>Azem<br>Limani<br>Jan<br>Marquiss | Wire transfer of \$322,131.06 issued by Alyeska Title to Countrywide representing proceeds from the sale of property located at 10541 Rezanof Circle purchased through fraudulently obtained loan described in Count 12   | 2/3/2005  |

39	Agim Delolli Azem Limani Jan Marquiss	Wire transfer of \$50,597.91 issued by Alyeska Title to Countrywide representing proceeds from the sale of property located at 10541 Rezanof Circle purchased through fraudulently obtained loan described in Count 12	2/3/2005
----	--	--	----------

All in violation of Title 18, United States Code, Sections 1957 and 2.

A TRUE BILL.

/s Grand Jury Foreperson  
GRAND JURY FOREPERSON

/s Karen L. Loeffler  
KAREN L. LOEFFLER  
Assistant U.S. Attorney  
222 West 7<sup>th</sup> Ave., #9, Rm. 253  
Anchorage, AK 99513-7567  
Phone: 907-271-5071  
Fax: 907-271-1500  
Email: karen.loeffler@usdoj.gov

/s Nelson P. Cohen  
NELSON P. COHEN  
United States Attorney  
222 West 7<sup>th</sup> Ave., #9, Rm. 253  
Anchorage, AK 99513-7567  
Phone: 907-271-5071  
Fax: 907-271-1500

DATED: 12/12/06