

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

UNITED STATES OF AMERICA )  
 )  
 v. ) No. \_\_\_\_\_  
 )  
 HAKIM A. JARADAT, ) Violations: Title 18, United States Code,  
 OSCAR PAREDES, ) Sections 1341 and 1343.  
 MARYAM KHAN, and )  
 RUWAIDA DABBOUSEH ) **UNDER SEAL**

**COUNT ONE**

The SPECIAL JANUARY 2009 GRAND JURY charges:

1. At times material to this indictment:

a. The Federal Bureau of Investigation and the Department of Housing and Urban Development, Office of Inspector General, conducted an undercover operation in which a cooperating individual (CI) posed as someone selling residences to nominee buyers by fraudulently obtaining mortgage loans on behalf of the nominee buyers who would default on the loans; and undercover agents (UCs) posed as the nominee buyers and as para-legals assisting in closing the real estate transactions;

b. As part of this undercover investigation, residences owned by the government, including 2853 W. Everett Street, Blue Island, Illinois (2853 W. Everett), were deeded to fictitious identities which the CI represented to be nominee sellers through which he controlled the residence;

c. Defendant HAKIM A. JARADAT was self-employed as a professional tax preparer located at 3948 North Austin Avenue, Chicago, Illinois.

d. Defendant MARYAM KHAN was an attorney licensed to practice law in the

state of Illinois and had offices at 7804 West College Drive, Palos Heights, Illinois.

e. AmTrust Bank (AmTrust) was a financial institution, the deposits of which were insured by the Federal Deposit Insurance Corporation, which made mortgage loans.

2. Beginning in or about March 2008 and continuing until in or about June 2008, in the Northern District of Illinois, Eastern Division, and elsewhere,

HAKIM A. JARADAT,  
OSCAR PAREDES,  
MARYAM KHAN and  
RUWAIDA DABBOUSEH,

defendants herein, and others known and unknown to the Grand Jury, knowingly devised and participated in a scheme to defraud and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, which scheme affected a financial institution, as further described below.

3. It was part of the scheme that defendants HAKIM A. JARADAT, OSCAR PAREDES, MARYAM KHAN and RUWAIDA DABBOUSEH fraudulently obtained mortgage loan proceeds from AmTrust by knowingly causing to be prepared and submitted a loan application and supporting loan documents on behalf of a nominee buyer of 2583 W. Everett which contained materially false and fraudulent statements concerning the nominee buyer's qualifications for the loan.

4. It was further part of the scheme that, on or about March 25, 2008, defendant HAKIM A. JARADAT met with the CI and offered to assist the CI in fraudulently obtaining a mortgage loan for a transaction involving 2853 W. Everett and, specifically, to recruit someone to assist in the preparation of the fraudulent mortgage loan application.

5. It was further part of the scheme that, on or about March 27, 2008, defendant

OSCAR PAREDES had a telephone conversation with the CI in which defendant PAREDES identified himself as defendant HAKIM A. JARADAT's friend and stated that he would help the CI fraudulently obtain a mortgage loan.

6. It was further part of the scheme that, on or about May 2, 2008, defendant OSCAR PAREDES had a telephone conversation with the CI in which defendant PAREDES confirmed that he was in the process of preparing a mortgage loan application in the name of a nominee buyer for 2853 W. Everett, well knowing that the nominee was a fictitious identity.

7. It was further part of the scheme that, on or about May 2, 2008, defendant HAKIM A. JARADAT and the CI had a telephone conversation with defendant OSCAR PAREDES in which defendant PAREDES requested that they produce fraudulent copies of tax returns in the name of the nominee buyer which would report income as being approximately \$75,000 per year, and that defendant JARADAT and the CI create false documentation representing that the nominee buyer had assets in a pre-existing bank account. Following the telephone call, defendant HAKIM A. JARADAT agreed to provide the CI with false tax returns for 2006 and 2007 in the name of nominee buyer.

8. It was further part of the scheme that, on or about May 5, 2008, defendant HAKIM A. JARADAT provided the CI with tax returns for 2006 and 2007 in the name of the nominee buyer, well knowing that they were false and that they would be used to support a fraudulent loan application on behalf of the nominee buyer to purchase 2853 W. Everett. Defendant JARADAT received \$200 from the CI in return for the false tax returns.

9. It was further part of the scheme that, on or about May 20, 2008, defendant OSCAR

PAREDES met with the CI and requested from \$7,000 to \$10,000 as compensation for his assistance in preparing the fraudulent mortgage loan application.

10. It was further part of the scheme that defendants OSCAR PAREDES and HAKIM A. JARADAT caused to be prepared and submitted to AmTrust a loan application and supporting documentation on behalf of the nominee buyer to purchase 2853 W. Everett, well knowing it to contain materially false and fraudulent statements and documents, including the false tax returns prepared by defendant HAKIM A. JARADAT, and a false representation that the nominee buyer had approximately \$38,000 in a LaSalle Bank checking account.

11. It was further part of the scheme that, after the title company expressed concerns about the difference between the appraised value of 2853 W. Everett and the loan amount, defendant RUWAIDA DABBOUSEH referred the CI to defendant MARYAM KHAN.

12. It was further part of the scheme that, on or about May 28, 2009, defendant RUWAIDA DABBOUSEH and the CI met with defendant MARYAM KHAN at her law office and informed defendant KHAN that the nominee buyer and nominee seller of 2853 W. Everett were not, in fact, real people. Defendant KHAN warned defendant DABBOUSEH and the CI about the potential liabilities, both criminal and civil, they all faced by proceeding with the fraudulent mortgage loan. Defendant KAHN then spoke with the title company and a representative of the lender, explaining the difference between the appraised value of the Everett property and the loan amount by falsely representing that the appraisal was incorrect because of improvements that had been made to the Everett property subsequent to the appraisal report, defendant KHAN well knowing that this statement was false and fraudulent because no improvements had actually been made to the Everett property. Defendant MARYAM KHAN received \$1,000 in cash from the CI

for her assistance with the fraudulent mortgage loan. Defendant RUWAIDA DABBOUSEH received \$500 in cash from the CI for recruiting defendant KAHN to make false statements to the title company and lender.

13. It was further part of the scheme that, on or about May 29, 2008, at defendant MARYAM KHAN's law office, defendants caused AmTrust to close and fund a mortgage loan of approximately \$147,250 to the nominee buyer of 2853 W. Everett. During this closing, defendant KHAN obtained proceeds of the fraudulent mortgage loan in the form of two checks, one in the amount of \$750 and the other in the amount of \$3,000. At the end of the closing, defendant RUWAIDA DABBOUSEH received an additional \$500 in cash from the CI in return for her assistance in fraudulently obtaining the mortgage loan.

14. It was further part of the scheme that, on or about May 29, 2008, following the closing, defendant OSCAR PAREDES received \$5,000 from the CI for his assistance in fraudulently obtaining the mortgage loan.

15. It was further part of the scheme that, on or about June 2, 2008, defendant HAKIM A. JARADAT received \$1,000 from the CI for his assistance in fraudulently obtaining the mortgage loan.

16. It was further part of the scheme that defendants HAKIM A. JARADAT, OSCAR PAREDES, MARYAM KHAN and RUWAIDA DABBOUSEH misrepresented, concealed, and hid, and caused to be misrepresented, concealed, and hidden, the purposes and acts done in furtherance of the scheme.

17. On or about May 29, 2008, in the Northern District of Illinois, Eastern Division, and

elsewhere,

HAKIM A. JARADAT  
OSCAR PAREDES,  
MARYAM KHAN and  
RUWAIDA DABBOUSEH,

defendants herein, for the purpose of executing the above-described scheme, knowingly caused to be transmitted by means of wire communication in interstate commerce, certain wirings, signs, and signals, namely, a funds transfer in the amount of approximately \$148,132.37 from AmTrust Bank in Cleveland, Ohio, to American Chartered Bank in Schaumburg, Illinois, which funds represented the proceeds of a mortgage loan for the purchase of 2853 West Everett;

In violation of Title 18, United States Code, Section 1343.

**COUNT TWO**

The SPECIAL JANUARY 2009 GRAND JURY further charges:

1. Paragraphs 1-16 of Count One of this indictment are realleged and incorporated as though fully set forth herein.
2. On or about May 29, 2008, in the Northern District of Illinois, Eastern Division, and elsewhere,

HAKIM A. JARADAT  
OSCAR PAREDES,  
MARYAM KHAN and  
RUWAIDA DABBOUSEH,

defendants herein, for the purpose of executing the above-described scheme and attempting to do so, knowingly caused to be delivered by Federal Express (“Fed Ex”), a commercial interstate courier, an envelope containing mortgage and closing documents for the purchase of the Everett property, which envelope was addressed to:

AmTrust Bank  
1111 Chester Avenue  
Park Plaza, Mail Stop OH-98-0302  
Cleveland, Ohio 44114-3545  
Fed Ex Tracking Number 7984 5128 3620;

In violation of Title 18, United States Code, Section 1341.

## FORFEITURE ALLEGATION

The SPECIAL JANUARY 2009 GRAND JURY further charges:

1. The allegations of Counts 1 and 2 of this Indictment are realleged and incorporated herein by reference for the purpose of alleging forfeiture to the United States pursuant to Title 18, United States Code, Section 982.

2. As a result of their violations of Title 18, United States Code, Sections 1341 and 1343, as alleged in the foregoing Indictment,

HAKIM A. JARADAT,  
OSCAR PAREDES,  
MARYAM KHAN and  
RUWAIDA DABBOUSEH,

defendants herein, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(2), any and all right, title, and interest they may have in any property, real and personal, constituting, and derived from, proceeds obtained directly and indirectly, from bank and mail fraud in connection with AmTrust Bank, which property is subject to forfeiture pursuant to Title 18, United States Code, Section 982.

3. The interests of the defendants, jointly and severally, subject to forfeiture pursuant to Title 18, United States Code, Section 982, include: all money and other property that was the subject of each transaction; constituted and was derived from proceeds of each transaction and was obtained, directly and indirectly, as a result of those violations, including funds in the amount of approximately \$12,000;

4. If any of the property subject to forfeiture and described above, as a result of any act or omission of the defendants:

(a) Cannot be located upon the exercise of due diligence;



- (b) Has been transferred or sold to, or deposited with, a third party;
- (c) Has been placed beyond the jurisdiction of the Court;
- (d) Has been substantially diminished in value; or
- (e) Has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property under the provisions of Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1).

All pursuant to Title 18, United States Code, Section 982.

A TRUE BILL:

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FOREPERSON

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UNITED STATES ATTORNEY