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IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF OHIO EASTERN DIVISION

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| CASE No. : 19 CR 582 |
| Title 18, United States Code, Sections 2314 and 2 |
| IIIDGE BARKER |
| C |

COUNT 1 (Interstate Transportation of Stolen Property, 18 U.S.C. §§ 2314 and 2)

The Grand Jury charges:

GENERAL ALLEGATIONS

De<u>fe</u>ndant

 Defendant ALI ABID, aka SHARIF, was a United States Citizen and a resident of New York.

OBJECT OF THE SCHEME

2. It was an object of the scheme for ABID and others to enrich themselves by devising a scheme and artifice to defraud and to obtain money and property from a then 69-year-old resident of the Northern District of Ohio, Eastern Division ("the Victim") by: (1) making materially false statements and representations regarding fictitious fees and costs associated with purported monetary loans and (2) collecting money from the Victim by means of cash payments.

MANNER AND MEANS OF THE SCHEME

- 3. It was part of the scheme that:
- 4. ABID and others participated in the planning and executing of the scheme to obtain money from the Victim.
- 5. Conspirator 1 represented himself to the Victim as "HARRY COHEN," a person who could secure loans for the Victim.
- 6. Conspirator 1 represented to the Victim that to secure these loans, the Victim would first need to pay fees and other costs ("the fees"), when, in fact, either no fee or cost was needed to actually apply for a loan or there was no actual loan being applied for.
- 7. Conspirator 1 told the Victim that the Victim could pay these fees by delivering cash payments in the manner Conspirator 1 instructed.

ACTS IN FURTHERANCE OF THE SCHEME

- 8. In furtherance of the scheme, and to effect the goals and conceal the existence thereof, Defendants and others performs acts in the Northern District of Ohio and elsewhere, including, but not limited to:
- 9. In or around July 2018, Conspirator 1 told the Victim that Conspirator 1 had secured the Victim a three-million dollar loan. Conspirator 1 told the Victim that, to finalize the loan, the Victim would first have to pay over \$100,000 in cash for fees associated with the loan, when in fact there was no loan and the purported fees were fictitious.
- 10. In or around July 2018, Conspirator 1 told the Victim that the Victim could make the initial payment for the fees by bringing \$50,000 to a specific home-improvement store parking lot in the Commonwealth of Pennsylvania.

- 11. On or about July 3, 2018, the Victim cashed a \$52,000 check at a checking cashing institution in the Northern District of Ohio, Eastern Division, and received, after fees related to the cashing of the check, approximately \$48,907.
- 12. On or about July 3, 2018, the Victim transported the approximately \$48,907 from the Northern District of Ohio to the specific home-improvement store parking lot in Johnstown, Pennsylvania.
- 13. On or about July 3, 2018, Conspirator 1, together with Conspirator 2 and ABID, traveled from New York to the specific home-improvement store parking lot in Johnstown, Pennsylvania to receive approximately \$50,000 from the Victim as an initial payment for the fees associated with the purported three-million dollar loan. While at the parking lot, Conspirator 1, staying out of the Victim's sight, spoke to the Victim on the telephone and instructed the Victim to provide the \$50,000 to a person, identified as "SHARIF," who was to meet him at the parking lot. ABID then approached the Victim, received the payment of approximately \$50,000, and then returned to Conspirator 1 and Conspirator 2.
- 14. On or about July 3, 2018, in the Northern District of Ohio, Eastern Division, Defendant ABID, having devised and intended to devise the aforesaid scheme and artifice to defraud, and for obtaining money and property by means of false and fraudulent pretenses, representations and promises, did cause to be transported approximately \$48,907 in cash from the State of Ohio to the Commonwealth of Pennsylvania, in the execution and concealment of the aforesaid scheme and artifice to defraud the Victim of property having a value of \$5,000 or more.
 - 15. All in violation of Title 18, United States Code, Sections 2314 and 2.

FORFEITURE

The Grand Jury further charges:

16. For the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), the allegations of Count 1 are incorporated herein by reference. As a result of the foregoing offense, Defendant ALI ABID, aka SHARIF, shall forfeit to the United States all property, real and personal, which constitutes or is derived from proceeds traceable to the violations charged herein.

A TRUE BILL.

Original document - Signatures on file with the Clerk of Courts, pursuant to the E-Government Act of 2002.