

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

UNITED STATES OF AMERICA        ) No.  
  ) )  
  ) v.        ) Violation: Title 18, United States Code,  
  )        ) Section 1343  
RUWAIDA DABBOUSEH                ) )  
and KHALIL QANDIL                 ) **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 paralegals assisting in closing the real estate transactions;

b. As part of this undercover investigation, residences owned by the government, including 1058 Four Seasons Boulevard, Aurora, Illinois (1058 Four Seasons), were deeded to fictitious identities which the CI represented to be nominee sellers through which he controlled the residence;

c. Defendant RUWAIDA DABBOUSEH was employed as a loan officer and prepared and submitted loan applications and supporting documentation to lenders;

d. Defendant KHALIL QANDIL was the owner and operator of a construction and remodeling business (Company A); and

e. Fieldstone Mortgage Company (Fieldstone) was a financial institution which made mortgage loans.

2. Beginning in or around June 2006 and continuing through in or around April 2007, in the Northern District of Illinois, Eastern Division, and elsewhere,

RUWAIDA DABBOUSEH  
and KHALIL QANDIL,

defendants herein, together with 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 RUWAIDA DABBOUSEH and KHALIL QANDIL, together with other co-schemers, fraudulently obtained mortgage loan proceeds from Fieldstone by knowingly causing to be prepared and submitted a loan application and supporting documents, on behalf of a nominee buyer of 1058 Four Seasons, that contained materially false and fraudulent statements concerning the nominee buyer's qualifications for the loan.

4. It was further part of the scheme that, in or around October 2006, defendant RUWAIDA DABBOUSEH met with the CI and agreed to prepare and submit a loan application for a nominee buyer of 1058 Four Seasons, defendant DABBOUSEH having

been told by the CI and believing that the nominee buyer was using a fictitious name and intended to default on the mortgage loan.

5. It was further part of the scheme that, on or about January 9, 2007, defendant RUWAIDA DABBOUSEH received \$300 from the CI in return for agreeing to prepare the fraudulent loan application on behalf of the nominee buyer of 1058 Four Seasons.

6. It was further part of the scheme that, on or about February 16, 2007, defendant RUWAIDA DABBOUSEH requested and received from the CI an additional \$500 for her assistance in preparing the fraudulent loan application, as well as \$600 to obtain a fraudulent homeowner's insurance policy for the nominee buyer.

7. It was further part of the scheme that, in or around February 2007, defendant RUWAIDA DABBOUSEH knowingly prepared, and caused others to prepare, a mortgage loan application on behalf of the nominee buyer for 1058 Four Seasons that was fraudulent in that it contained material false statements, including the buyer's identity and employment, defendant well knowing that the buyer was a nominee using a fictitious identity and the employment had been fabricated by defendant.

8. It was further part of the scheme that, on or about February 22, 2007, defendant RUWAIDA DABBOUSEH met with the UC posing as the nominee buyer of 1058 Four Seasons and caused the UC to sign the loan application well knowing that the nominee was applying for the loan under a fictitious identity.

9. It was further part of the scheme that, in or around March 2007, defendant

RUWAIDA DABBOUSEH caused others to submit to Fieldstone the loan application containing false statements, including the nominee buyer's identity and employment, well knowing that the false statements were material to Fieldstone's decision to approve the mortgage loan.

10. It was further part of the scheme that, on or about April 9, 2007, defendant RUWAIDA DABBOUSEH informed the CI that defendant KHALIL QANDIL, the owner and operator of Company A, would provide a false verification of employment (VOE) for the nominee buyer in support of the fraudulent loan application.

11. It was further part of the scheme that, on or about April 9, 2007, defendant KHALIL QANDIL submitted to Fieldstone a VOE falsely representing that the nominee buyer had been employed by Company A since November 2004, and was a Purchase Manager, defendant QANDIL well knowing that the nominee buyer had never been employed at Company A.

12. It was further part of the scheme that, on or about April 20, 2007, defendant RUWAIDA DABBOUSEH attended the closing for 1058 Four Seasons and caused Fieldstone to close on the mortgage loan to the nominee buyer.

13. It was further a part of the scheme that defendants RUWAIDA DABBOUSEH and KHALIL QANDIL, and others, caused Fieldstone to fund a mortgage loan of approximately \$153,000 to the nominee buyer of 1058 Four Seasons.

14. It was further part of the scheme that, on or about April 24, 2007, defendant RUWAIDA DABBOUSEH received \$5,000 of the proceeds of the mortgage loan to

purchase 1058 Four Seasons in return for fraudulently obtaining the mortgage loan.

15. It was further part of the scheme that defendants RUWAIDA DABBOUSEH and KHALIL QANDIL, and others, concealed, misrepresented, and hid, and caused to be concealed, misrepresented, and hidden, the existence and purposes of the scheme.

16. On or about April 19, 2007, in the Northern District of Illinois, Eastern Division, and elsewhere,

RUWAIDA DABBOUSEH  
and KHALIL QANDIL,

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 \$148,106.94 from Citibank in New York, New York, to JP Morgan Chase in Chicago, Illinois, which funds represented the proceeds of a mortgage loan for the purchase of 1058 Four Seasons;

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

FORFEITURE ALLEGATION

The SPECIAL JANUARY 2009 GRAND JURY further charges:

1. The allegations of Count One 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 her violation of Title 18, United States Code, Section 1343, as alleged in the foregoing Indictment,

RUWAIDA DABBOUSEH,

defendant 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 she may have in any property, real and personal, constituting, and derived from, proceeds obtained directly and indirectly, from wire fraud in connection with Fieldstone, which property is subject to forfeiture pursuant to Title 18, United States Code, Section 982.

3. The interests of the defendant 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 \$6,400;

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

- (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