

No.

CR 12
00465 DLJ

00465 DLJ

PSC

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN JOSE DIVISION

I hereby attest and certify this is a printed copy of a document which was electronically filed with the United States District Court of the Northern District of California.

Date Filed: 6/13/12

By: Richard W. Wieking, Clerk
Debra J. Hays, Deputy Clerk

THE UNITED STATES OF AMERICA

vs.

MUHAMMAD OUSSAMA SAFADI,
SCOTT GHAIS SAFADI, and
RAQUEL RAMIREZ,

INDICTMENT

COUNT ONE: 18 U.S.C. § 1349 - Conspiracy to Commit Bank Fraud

COUNTS TWO THROUGH FOUR: 18 U.S.C. § 1344 - Bank Fraud; 18 U.S.C. § 2 - Aiding and Abetting

COUNTS FIVE THROUGH SEVEN: 18 U.S.C. § 1014 - Making A False Statement to a Bank;
18 U.S.C. § 2 - Aiding and Abetting

A true bill.

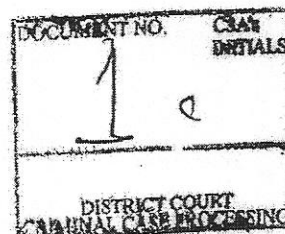
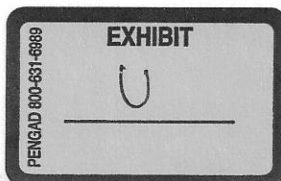
Margaret Elizabeth Sladek
Foreperson

Filed in open court this 13 day of June A.D. 2012

UNITED STATES MAGISTRATE JUDGE

*No Bail Warrants for the two Safadis.
No process for Ramirez.*

Bail. \$ _____



No.

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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

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COUNT ONE: 18 U.S.C. § 1349 - Conspiracy to Commit Bank Fraud

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COUNTS FIVE THROUGH SEVEN: 18 U.S.C. § 1014 - Making A False Statement to a Bank;
18 U.S.C. § 2 - Aiding and Abetting

A true bill.

Mary Elizabeth Sladek
Foreperson

Filed in open court this 13 day of June A.D. 2012

UNITED STATES MAGISTRATE JUDGE

*No Bail Warrants for the two Safadis.
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Bail. \$ _____

DOCUMENT NO.	CR 12
1	e
DISTRICT COURT CRIMINAL CASE PROCESSING	

MELINDA HAAG (CABN 132612)
United States Attorney
Attorney for Plaintiff

SEALED BY ORDER
OF THE COURT

FILED

2012 JUN 13 P 2:17

RICHARD W. WIEKING
CLERK, U.S. DISTRICT COURT
N.D. CALIFORNIA

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

SAN JOSE DIVISION

UNITED STATES OF AMERICA,
Plaintiff,

v.

MUHAMMAD OUSSAMA SAFADI,
SCOTT GHAISS SAFADI, and
RAQUEL RAMIREZ,

Defendants.

CR 12

No.

00465

DLJ PSG

VIOLATIONS: 18 U.S.C. § 1349 –
Conspiracy to Commit Bank Fraud; 18
U.S.C. § 1344 – Bank Fraud; 18 U.S.C. §
1014 – Making False Statements to a Bank;
18 U.S.C. § 2 – Aiding And Abetting; 18
U.S.C. § 982 (a)(2)(A) – Forfeiture of Fraud
Proceeds

SAN JOSE VENUE

INDICTMENT

The Grand Jury charges:

At all times relevant to this indictment, unless otherwise indicated:

Introductory Allegations

1. Defendant MUHAMMAD OUSSAMA SAFADI (SAM SAFADI) constructed fourteen single family residences in a subdivision in Salinas, California. The name of the subdivision was Rancho Amistoso LLC. SAM SAFADI built Rancho Amistoso through his construction company, Focus Construction, Inc.

INDICTMENT

1 2. SAM SAFADI's nephew, SCOTT GHAI SAFADI (SCOTT SAFADI), was a partner in
2 Focus Construction and oversaw the sales and marketing of the Rancho Amistoso homes.

3 3. RAQUEL RAMIREZ acted as the broker of record for the Rancho Amistoso properties
4 on behalf of the prospective buyers. She was the owner of the realty company Mission Homes
5 Realty, and was a licensed real estate and mortgage broker in the state of California.

6 4. Lenders typically required loan applicants to fill out loan applications known as Uniform
7 Residential Loan Applications ("URLAs"). URLAs required borrowers to accurately list their
8 income, assets, employment, and the source of the down payment. Lenders often sought to verify
9 employment information, and required those who were self-employed to provide what was
10 commonly referred to as a Certified Public Accountant ("CPA") letter. CPA letters were written
11 and signed by the person or entity preparing the applicant's tax returns, verifying that the
12 signatory prepared the applicant's tax returns and that the applicant owned the identified
13 business. Lenders relied on the accuracy of the information provided by borrowers in URLAs
14 and other documents in evaluating whether to fund mortgages.

15 5. "Stated income" and "stated income/stated asset" or "no income/no asset" loans
16 (hereinafter, "stated income loans") were loan products that did not require borrowers to provide
17 independent verification of income or assets listed on the URLA.

18 6. The majority of the Rancho Amistos loans were 80/20 stated-income loans in which the
19 entire purchase price of the property was financed. The lenders were Fremont Investment &
20 Loan, National City Bank of Indiana, and IndyMac Bank, FSB. All were financial institutions
21 whose accounts were insured by the FDIC at the time the loans were funded.

22 7. The Rancho Amistoso loans were also financed through GreenPoint Mortgage, a
23 subsidiary of North Fork Bank, whose accounts were also insured by the FDIC at the time the
24 loans were funded.

25 The Scheme and Artifice to Defraud

26 8. Beginning no later than 2005, and continuing through approximately July 19, 2006, SAM
27 SAFADI, SCOTT SAFADI, and RAMIREZ solicited primarily low-income home buyers to
28 purchase single-family residences in the Rancho Amistoso subdivision, priced in excess of

1 \$650,000. The conspirators knew that, for twelve of the Rancho Amistoso properties, the
2 borrowers they solicited had insufficient incomes and assets to qualify for the mortgages needed
3 to purchase the properties.

4 9. In June of 2005, SAM SAFADI purchased land located in east Salinas, California. He
5 obtained financing from Heritage Bank of Commerce in the form of a construction loan for up to
6 \$5 million. SAM SAFADI drew just under \$4 million from this loan and to build the fourteen
7 home Rancho Amistoso subdivision.

8 10. SAM and SCOTT SAFADI distributed English and Spanish language advertisements,
9 directing potential purchasers to visit the model home location on Amarillo Way, in Salinas.
10 SCOTT SAFADI conducted credit checks of the potential buyers, and directed those who would
11 qualify for stated income loans to RAMIREZ, who assisted with obtaining financing for the
12 purchase of Rancho Amistoso property.

13 11. The SAFADIs referred prospective low-income clients to RAMIREZ knowing that
14 RAMIREZ, and her employees at Mission Home Realty, would falsely inflate and misrepresent
15 the borrower's income, assets, and employment information so as to enable the borrower to
16 qualify for the loans needed to buy a Rancho Amistoso property.

17 12. RAMIREZ agreed to accept a sales commission of 2% per transaction, and to do what
18 was necessary to close the sales, including falsify the buyers' loan applications. None of the
19 buyers for the twelve subject properties used independent real estate agents or obtained financing
20 independent of RAMIREZ, who was in effect acting as the SAFADIs' agent.

21 13. As an inducement for the unqualified buyers to agree to the loan, some of the buyers were
22 offered a \$26,000 rebate that would be paid to the buyers at closing. RAMIREZ agreed with the
23 SAFADIs to serve as the conduit for the \$26,000 rebates in order to conceal the rebate from the
24 lenders. The conspirators agreed to inflate RAMIREZ's commission in the closing documents
25 above her agreed upon 2% sales commission. SCOTT SAFADI calculated RAMIREZ's
26 commission plus the \$26,000 and other incidental costs to be reimbursed to the borrower, and
27 informed the title agent, a person known to the Grand Jury as J.G., formerly of First American
28

1 Title Company, who disbursed to RAMIREZ a commission that included the concealed rebate.
 2 RAMIREZ, in turn, passed the \$26,000 along to the borrowers.

3 14. RAMIREZ utilized the services of several persons who acted as "brokers" of false
 4 documents that were submitted in support of the Rancho Amistoso loan applications, including
 5 people known to the Grand Jury as Broker J.V., Broker T.R., and Broker A.P. These brokers
 6 were paid approximately \$100 – \$200 per document by RAMIREZ and her staff to obtain false
 7 verifications of rent, and false CPA letters.

8 15. RAMIREZ was assisted by her employees at Mission Homes Realty, including persons
 9 known to the Grand Jury as Employee N.M. and Employee J.V. These employees served as loan
 10 processors, and obtained and submitted the false documents to the financial institutions in
 11 support of the loan applications at the direction of RAMIREZ and the SAFADIs.

12 16. On July 31, 2008, the first of the Rancho Amistoso properties in default status was sold
 13 through the foreclosure process. The 2006 sale price of the property was \$725,000; the re-sale
 14 price of the property was \$288,000. On August 28, 2009, the twelfth of the Rancho Amistoso
 15 properties in default status was sold through the foreclosure process. The 2006 sale price of the
 16 property was \$725,000; the re-sale price of the property was \$212,000.

17 17. The SAFADIs and RAMIREZ caused a post-foreclosure loss amount to the financial
 18 institutions of approximately \$5,560,050. The SAFADIs obtained proceeds from the scheme to
 19 defraud in an amount of \$4,570,928.87. RAMIREZ obtained proceeds from the scheme to
 20 defraud in an amount of \$230,029.75.

21 COUNT ONE: (18 U.S.C. § 1349 – Conspiracy to Commit Bank Fraud)

22 18. Paragraphs 1 through 17 of this Indictment are alleged and incorporated as if fully set
 23 forth here.

24 19. Beginning at a time unknown to the Grand Jury, but no later than in or about 2005, and
 25 continuing through approximately July 2006, in the Northern District of California and
 26 elsewhere, the defendants,

27 MUHAMMAD OUSSAMA SAFADI,
 28 SCOTT GHAISS SAFADI, and
 RAQUEL RAMIREZ,

1 and others, conspired to devise and did devise a scheme and artifice (A) to defraud as to a
2 material matter the financial institutions listed in Paragraph 4 of this Indictment, and (B) to
3 obtain any of the moneys, funds, credits, and assets owned by, and under the custody and control
4 of, those same financial institutions, by means of materially false and fraudulent pretenses,
5 representations, and promises, and material omissions, in violation of Title 18, United States
6 Code, Section 1349.

7 COUNTS TWO THROUGH FOUR: (18 U.S.C. § 1344 – Bank Fraud; 18 U.S.C. § 2 – Aiding
8 and Abetting)

9 20. Paragraphs 1 through 17 of this Indictment are realleged and incorporated as if fully set
10 forth here.

11 21. On or about the dates set forth below, in the Northern District of California and
12 elsewhere, the defendants,

13 MUHAMMAD OUSSAMA SAFADI,
14 SCOTT GHAISS SAFADI, and
15 RAQUEL RAMIREZ,

16 and others known and unknown to the Grand Jury, did execute, and attempt to execute, a scheme
17 and artifice (A) to defraud the financial institution named below as to a material matter, and (B)
18 to obtain any of the moneys, funds, credits, and assets owned by, and under the custody and
19 control of, said financial institution, by means of materially false and fraudulent pretenses,
20 representations, and promises, and material omissions,
21 as follows:

22 //

23 //

24 //

25 //

26 //

27 //

28 //

INDICTMENT

Count	Date	Financial Institution	Borrower	Fraudulent Representations in URLA
2	3/18/2006	IndyMac Bank	S.A.	1. Inflated monthly income 2. False employment 3. Inflated assets 4. False tax preparer certification
3	5/9/2006	Fremont Investment and Loan	J.T.	1. Inflated monthly income 2. False employment 3. Inflated assets 4. Concealed payment to borrower 5. False tax preparer certification 6. False verification of rent 7. False verification of deposit
4	6/2/2006	National City Bank of Indiana	R.P.	1. Inflated monthly income 2. False employment 3. Inflated assets 4. Concealed payment to borrower 5. False tax preparer certification

Each in violation of Title 18, United States Code, Sections 1344 and 2.

COUNTS FIVE THROUGH SEVEN: (18 U.S.C. § 1014 – Making A False Statement to a Bank; 18 U.S.C. § 2 – Aiding and Abetting)

22. Paragraphs 1 through 17 of this Indictment are realleged and incorporated as if fully set forth here.

23. On or about the dates set forth below, in the Northern District of California and elsewhere, the defendants,

MUHAMMAD OUSSAMA SAFADI,
SCOTT GHAISS SAFADI, and
RAQUEL RAMIREZ,

and others known and unknown to the Grand Jury, did knowingly make and cause to be made a false statement in an URLA, and did submit false and fraudulent documents in support of an URLA, for the purpose of influencing the actions of a financial institution insured by the Federal Deposit Insurance Corporation, as follows:

INDICTMENT

Count	Date	Financial Institution	Borrower	False Statements and Fraudulent Documents in Support of URLA
5	3/18/2006	IndyMac Bank	S.A.	1. Inflated monthly income 2. False employment 3. Inflated assets 4. False tax preparer certification
6	5/9/2006	Fremont Investment and Loan	J.T.	1. Inflated monthly income 2. False employment 3. Inflated assets 4. Concealed payment to borrower 5. False tax preparer certification 6. False verification of rent 7. False verification of deposit
7	6/2/2006	National City Bank of Indiana	R.P.	1. Inflated monthly income 2. False employment 3. Inflated assets 4. Concealed payment to borrower 5. False tax preparer certification

Each in violation of Title 18, United States Code, Sections 1014 and 2.

FORFEITURE ALLEGATION: (18 U.S.C. § 982(a)(2)(A) – Forfeiture of Bank Fraud Proceeds)

20. The factual allegations contained in Paragraphs 1 through 17 and in Counts One through Seven of this Indictment are hereby realleged and by this reference fully incorporated here for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 982(a)(2)(A).

21. Upon a conviction of any of the offenses alleged in Counts One through Seven above, the defendants,

MUHAMMAD OUSSAMA SAFADI,
SCOTT GHAISS SAFADI, and
RAQUEL RAMIREZ,

1 shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(2)(A)
2 any property constituting, or derived from, proceeds the defendants obtained directly or
3 indirectly, as a result of said violations, including but not limited to the following:

4 (a) **Money Judgment:** a sum of money equal to the total gross
5 proceeds obtained as a result of the offenses.

6 22. If any of said property, as a result of any act or omission of the defendants –

- 7 (a) cannot be located upon the exercise of due diligence;
8 (b) has been transferred or sold to or deposited with, a third person;
9 (c) has been placed beyond the jurisdiction of the Court;
10 (d) as been substantially diminished in value; or
11 (e) has been commingled with other property which cannot be divided
12 without difficulty;

13 any and all interest defendants have in any other property shall be forfeited to the United States,
14 pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United
15 States Code, Section 982(b) and Rule 32.2 of the Federal Rules of Criminal Procedure.

16
17 DATED: June 13, 2012

A TRUE BILL.

18
19 Mary Elizabeth Sladek
20 FOREPERSON

21 MELINDA HAAG
United States Attorney

22 [Signature]
23 AMBER S. ROSEN
24 Deputy Chief, San Jose Office

25 (Approved as to form: [Signature]
AUSA Daniel Kaleba

26
27
28
INDICTMENT

AO 257 (Rev. 6/78)

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURTBY: ☐ COMPLAINT ☐ INFORMATION ☒ INDICTMENT
☐ SUPERSEDING**OFFENSE CHARGED**

*Attached

- ☐
- Petty
-
- ☐
- Minor
-
- ☐
- Misdemeanor
-
- ☒
- Felony

PENALTY: *Attached

CR 12

Name of District Court, and/or Judge/Magistrate Location

NORTHERN DISTRICT OF CALIFORNIA

SAN JOSE DIVISION

DEFENDANT - U.S.

MUHAMMAD OUSSAMA SAFADI

DISTRICT COURT NUMBER

00465**DLJ****PSG****PROCEEDING**

Name of Complainant Agency, or Person (& Title, if any)

Kyle Bashor, Special Agent - IRS

☐ person is awaiting trial in another Federal or State Court, give name of court☐ this person/proceeding is transferred from another district per (circle one) FRCrp 20, 21, or 40. Show District☐ this is a reprosecution of charges previously dismissed which were dismissed on motion of:☐ U.S. ATTORNEY ☐ DEFENSESHOW
DOCKET NO.☐ this prosecution relates to a pending case involving this same defendantMAGISTRATE
CASE NO.☐ prior proceedings or appearance(s) before U.S. Magistrate regarding this defendant were recorded under

Name and Office of Person

Furnishing Information on this form MELINDA HAAG

☒ U.S. Attorney ☐ Other U.S. Agency

Name of Assistant U.S.

Attorney (if assigned)

DANIEL KALEBA

DEFENDANT**IS NOT IN CUSTODY**

Has not been arrested, pending outcome this proceeding.

1) ☒ If not detained give date any prior summons was served on above charges2) ☐ Is a Fugitive3) ☐ Is on Bail or Release from (show District)**IS IN CUSTODY**4) ☐ On this charge5) ☐ On another conviction☐ Federal ☐ State6) ☐ Awaiting trial on other charges

If answer to (6) is "Yes", show name of institution

Has detainer been filed? ☐ Yes ☐ No

If "Yes" give date filed

DATE OF ARREST

Month/Day/Year

Or... if Arresting Agency & Warrant were not

DATE TRANSFERRED TO U.S. CUSTODY

Month/Day/Year

☐ This report amends AO 257 previously submitted**ADDITIONAL INFORMATION OR COMMENTS****PROCESS:**☐ SUMMONS ☐ NO PROCESS* ☒ WARRANT

If Summons, complete following:

☐ Arraignment ☐ Initial Appearance

Defendant Address:

Bail Amount: No Bail

* Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

Date/Time:

Before Judge:

Comments:

Δ1

Attachment to Penalty Sheet

UNITED STATES

vs.

MUHAMMAD OUSSAMA SAFADI,
SCOTT GHAISSAFADI, and
RAQUEL RAMIREZ,

Counts One through Four: 18 U.S.C. § 1349 – Conspiracy to Commit Bank Fraud;
18 U.S.C. § 1344 – Bank Fraud

- | | | |
|------|-----------------------------|-------------|
| i. | Maximum imprisonment: | 30 years |
| ii. | Maximum supervised release: | 3 years |
| iii. | Maximum fine: | \$1,000,000 |
| iv. | Special assessment | \$100 |

Counts Five through Seven: 18 U.S.C. § 1014 – Making False Statements to a Bank

- | | | |
|------|-----------------------------|-------------|
| i. | Maximum imprisonment: | 30 years |
| ii. | Maximum supervised release: | 3 years |
| iii. | Maximum fine: | \$1,000,000 |
| iv. | Special assessment | \$100 |

AO 257 (Rev. 6/78)

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURTBY: ☐ COMPLAINT ☐ INFORMATION ☒ INDICTMENT**OFFENSE CHARGED** ☐ SUPERSEDING

*Attached

- ☐ Petty
☐ Minor
☐ Misdemeanor
☒ Felony

PENALTY: *Attached

Name of District Court, and/or Judge/Magistrate Location

NORTHERN DISTRICT OF CALIFORNIA

SAN JOSE DIVISION

DEFENDANT - U.S.

SCOTT GHAS SAFADI,

DISTRICT COURT NUMBER

CR 12 00465

DLJ PSG

PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)

Kyle Bashor, Special Agent - IRS

☐ person is awaiting trial in another Federal or State Court, give name of court☐ this person/proceeding is transferred from another district per (circle one) FRCrp 20, 21, or 40. Show District☐ this is a reprosecution of charges previously dismissed which were dismissed on motion of:☐ U.S. ATTORNEY ☐ DEFENSESHOW
DOCKET NO.☐ this prosecution relates to a pending case involving this same defendantMAGISTRATE
CASE NO.☐ prior proceedings or appearance(s) before U.S. Magistrate regarding this defendant were recorded underName and Office of Person
Furnishing Information on this form MELINDA HAAG☒ U.S. Attorney ☐ Other U.S. AgencyName of Assistant U.S.
Attorney (if assigned) DANIEL KALEBA**DEFENDANT****IS NOT IN CUSTODY**

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If answer to (6) is "Yes", show name of institution

Has detainer
been filed? ☐ Yes ☐ NoIf "Yes"
give date
filed**DATE OF
ARREST**

Month/Day/Year

Or... if Arresting Agency & Warrant were not

**DATE TRANSFERRED
TO U.S. CUSTODY**

Month/Day/Year

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Date/Time: Before Judge:

Comments:

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Counts Five through Seven: 18 U.S.C. § 1014 – Making False Statements to a Bank

- | | | |
|------|-----------------------------|-------------|
| i. | Maximum imprisonment: | 30 years |
| ii. | Maximum supervised release: | 3 years |
| iii. | Maximum fine: | \$1,000,000 |
| iv. | Special assessment | \$100 |

AO 257 (Rev. 6/78)

SEAL BY ORDER OF THE COURT

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT

BY: ☐ COMPLAINT ☐ INFORMATION ☒ INDICTMENT
☐ SUPERSEDING

OFFENSE CHARGED

*Attached

- ☐ Petty
☐ Minor
☐ Misdemeanor
☒ Felony

PENALTY: *Attached

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NORTHERN DISTRICT OF CALIFORNIA

SAN JOSE DIVISION

DEFENDANT - U.S.

RAQUEL RAMIREZ

DISTRICT COURT NUMBER

CR12 00465 DLJ

PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)

Kyle Bashor, Special Agent - IRS

☐ person is awaiting trial in another Federal or State Court, give name of court

☐ this person/proceeding is transferred from another district per (circle one) FRCrp 20, 21, or 40. Show District

☐ this is a reprosecution of charges previously dismissed which were dismissed on motion of:

☐ U.S. ATTORNEY ☐ DEFENSE

SHOW DOCKET NO.

☐ this prosecution relates to a pending case involving this same defendant

MAGISTRATE CASE NO.

☐ prior proceedings or appearance(s) before U.S. Magistrate regarding this defendant were recorded under

Name and Office of Person

Furnishing Information on this form MELINDA HAAG

☒ U.S. Attorney ☐ Other U.S. Agency

Name of Assistant U.S.

Attorney (if assigned)

DANIEL KALEBA

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2) ☐ Is a Fugitive

3) ☐ Is on Bail or Release from (show District)

IS IN CUSTODY

4) ☐ On this charge

5) ☐ On another conviction

☐ Federal ☐ State

6) ☐ Awaiting trial on other charges

If answer to (6) is "Yes", show name of institution

Has detainer been filed? ☐ Yes ☐ No

If "Yes" give date filed

DATE OF ARREST

Month/Day/Year

Or... if Arresting Agency & Warrant were not

DATE TRANSFERRED TO U.S. CUSTODY

Month/Day/Year

☐ This report amends AO 257 previously submitted

ADDITIONAL INFORMATION OR COMMENTS**PROCESS:**

☐ SUMMONS ☒ NO PROCESS* ☐ WARRANT

If Summons, complete following:

☐ Arraignment ☐ Initial Appearance

Defendant Address:

Bail Amount:

* Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

Date/Time:

Before Judge:

Comments:

A3

Attachment to Penalty Sheet

UNITED STATES

vs.

MUHAMMAD OUSSAMA SAFADI,
SCOTT GHAISSAFADI, and
RAQUEL RAMIREZ,

Counts One through Four: 18 U.S.C. § 1349 – Conspiracy to Commit Bank Fraud;
18 U.S.C. § 1344 – Bank Fraud

- | | | |
|------|-----------------------------|-------------|
| i. | Maximum imprisonment: | 30 years |
| ii. | Maximum supervised release: | 3 years |
| iii. | Maximum fine: | \$1,000,000 |
| iv. | Special assessment | \$100 |

Counts Five through Seven: 18 U.S.C. § 1014 – Making False Statements to a Bank

- | | | |
|------|-----------------------------|-------------|
| i. | Maximum imprisonment: | 30 years |
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