## UNITED STATES DISTRICT COURT EASTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

**CRIMINAL NO. 03-80087** 

V,

HON.

Lawrence P. Zatkoff

D-1 BASSEM KAMEL KHAFAGI.

VIO. 18 U.S.C. § 1344

Defendant.

MAGISTRATE JUDGE MORGA

## INDICTMENT

THE GRAND JURY CHARGES:

COUNT ONE: (Bank Fraud - 18 U.S.C. § 1344)

## D-1 BASSEM KAMEL KHAFAGI

Between on or about February 5 and February 8, 2001, within the Eastern District of Michigan, Southern Division, BASSEM KAMEL KHAFAGI, defendant herein, knowingly executed, and attempted to execute, a scheme to obtain the moneys and funds under the custody and control of a financial institution, namely, National City Bank, which was then insured by the Federal Deposit Insurance Corporation, by means of false and fraudulent pretenses, representations, and promises, all in violation of Title 18, United States Code, Section 1344.

COUNT TWO: (Bank Fraud - 18 U.S.C. § 1344)

## D-1 BASSEM KAMEL KHAFAGI

Between on or about February 5, 2001 and June 15, 2001, within the Eastern District of Michigan, Southern Division, BASSEM KAMEL KHAFAGI, defendant herein, knowingly executed, and attempted to execute, a scheme to obtain the moneys and funds under the custody and control of a financial institution, namely, TCF Bank, which was then insured by the Federal Deposit Insurance Corporation, by means of false and fraudulent pretenses, representations, and promises, all in violation of Title 18, United States Code, Section 1344.

THIS IS A TRUE BILL.

FOREPERSON'

Dated: 2-/3-03

JEFFREY G. COLLINS United States Attorney

KENNETH R. CHADWELL Assistant United States Attorney