

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

-vs-

D-1 KALIL KHALIL,

Defendant.

Case: 2:07-cr-20104  
Assigned To: Borman, Paul D  
Referral Judge: Scheer, Donald A  
Filed: 03-02-2007 At 04:40 PM  
INFO USA V. KHALIL (TAM)

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**INFORMATION**

THE UNITED STATES ATTORNEY CHARGES:

**COUNT ONE**  
(18 U.S.C. § 1343 – Wire Fraud)

D-1 KALIL KHALIL

1. From approximately January 2001 to June 2003, in the Eastern District of Michigan, KALIL KHALIL, defendant herein, devised and participated in a scheme to defraud mortgage lenders and to obtain money by means of false and fraudulent pretenses and representations.

2. It was a part of the scheme that KHALIL would prepare loan applications and related documents (the loan packages), or cause them to be prepared, and would then submit the loan packages to mortgage lenders, or cause them to be

submitted.

3. It was also a part of the scheme that each of the loan packages submitted to a mortgage lender would be fraudulent in one or more of the following ways, as KHALIL well knew:

- the purpose of the loan was not to buy or refinance a residence,
- the borrower described on the application was not the true borrower,
- the description of the borrower's employment was false,
- documents purporting to substantiate the borrower's employment (W-2 Forms, check stubs) were bogus,
- the appraisal was inflated and forged,
- title to the property was not free and clear, and the title company purporting to guarantee clear title was merely a name used by the defendants (Taylor Title, Downriver Title, Tri-County Title) to carry out their scheme,
- photographs were included that depicted a property other than the property identified in the loan application.

4. On a number of different occasions during the period January 2001 to June 2003, for the purpose of executing the scheme, KALIL KHALIL, defendant herein, did knowingly cause to be transmitted by means of wire in interstate commerce certain writings, signs, signals, and sounds, which constituted the transfer by wire of loan proceeds from a bank account located outside of the State of Michigan of a mortgage lender to a bank account located in metropolitan Detroit in the name of

"Taylor Title," "TT Escrow," "Downriver Title," or "Tri-County Title," in the Eastern District of Michigan, Southern Division, in violation of Section 1343 of Title 18 of the United States Code.

STEPHEN J. MURPHY  
*United States Attorney*

s/Stephen L. Hiyama  
STEPHEN L. HIYAMA  
*Assistant United States Attorney*  
211 West Fort Street, Suite 2001  
Detroit, Michigan 48226-3220  
phone: 313-226-9674  
e-mail: [stephen.hiyama@usdoj.gov](mailto:stephen.hiyama@usdoj.gov)  
bar no.: P32236

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