



institution, with offices at, among other places, 400 Professional Drive, Suite 100, Gaithersburg, Maryland 20879.

3. On or about March 4, 2002, clients of LICKSTEIN with the initials RF and WF entered into a contract, dated March 4, 2002, to sell their residence, located in Great Falls, Virginia 22066 (hereinafter, "the Great Falls Property") to an individual named Alladean M. Allobaidy (hereinafter, "Allobaidy"), formerly of Falls Church, Virginia. Among the terms of that contract were the following:
  - a. the sales price was \$5,995,000;
  - b. a down payment in the amount of \$550,000 would be paid; and,
  - c. LICKSTEIN was to be the settlement attorney, and would hold the \$550,000 escrow payment referred to above in escrow.
4. In June 2002, LBB agreed to provide a first mortgage to Allobaidy to finance his purchase of the Great Falls Property.

## **II. THE CONSPIRACY AND ITS OBJECTS**

5. Beginning in or about March 2002, and continuing through in or about July 2002, the exact dates being unknown, in the Eastern District of Virginia and elsewhere, the defendant, LICKSTEIN did unlawfully, willfully, and knowingly conspire, combine, confederate and agree with others known and unknown to commit an offense against the United States, namely bank fraud, in violation of Title 18, United States Code, Section 1344.
6. The object of the conspiracy was to obtain from LBB mortgage financing for the Great Falls Property sale through the provision of false material information.

### **III. MANNER AND MEANS OF THE CONSPIRACY**

7. It was a part of the conspiracy that LICKSTEIN knowingly prepared, and caused to be filed in the land records of Fairfax County, Virginia, false legal documents, including a deed of trust, which documents were designed to deceive the lender, LBB, into believing that secondary financing in the sale of the Great Falls Property had come from a financial institution known as "Crescent Mortgage," when, in truth and in fact, as LICKSTEIN then well knew, such secondary financing had come in the form of a seller-held note, contrary to an express loan requirement of LBB.
8. It was further a part of the conspiracy that LICKSTEIN caused a false HUD- 1 Settlement Statement regarding the sale of the Great Falls Property to be prepared, signed and submitted to LBB.


### **IV. OVERT ACT**

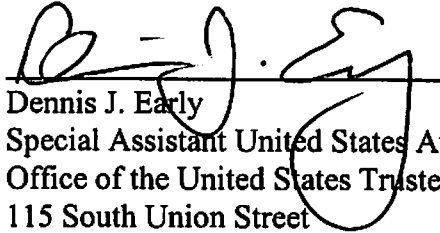
9. In furtherance of the conspiracy, and to effect the objects thereof, on or about June 28, 2002, the defendant, LICKSTEIN, participated in a real estate settlement, held at his Fairfax, Virginia, law offices, at which the sale of the Great Falls Property closed.

(All in violation of Title 18, United States Code, Section 371.)

Respectfully submitted,

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