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**IN THE SUPERIOR COURT OF THE STATE OF ARIZONA
IN AND FOR THE COUNTY OF MARICOPA**

STATE OF ARIZONA,
Plaintiff,

v.

**AMERA SOLIMAN GHANNAM A.K.A
AMERA S. SAADELDIN (001)**
(COUNTS 1, 2, 3, 4, 5)

AND

RAWA A. SAYAH (002)
(COUNTS 1, 2, 3),

Defendants.

Case No:

92 SGJ 40

INDICTMENT

CHARGING VIOLATIONS OF:

COUNT 1: CONSPIRACY, a Class 2
felony, in violation of A.R.S. § 13-1003

**COUNTS 2 & 4: ILLEGALLY
CONDUCTING AN ENTERPRISE**, Class
3 felonies, in violation of A.R.S. § 13-2312

**COUNTS 3 & 5: FRAUDULENT
SCHEMES AND ARTIFICES**: Class 2
felonies, in violation of A.R.S. § 13-2310

The Arizona State Grand Jury accuses **AMERA SOLIMAN GHANNAM A.K.A
AMERA S. SAADELDIN** and **RAWA A. SAYAH**, charging on this ___ day of ___,
2023 that in or from Maricopa County, Arizona:

COUNT 1

CONSPIRACY

On or between about December 16, 2020 and May 13, 2021, **AMERA SOLIMAN GHANNAM A.K.A AMERA S. SAADELDIN** and **RAWA A. SAYAH**, defendants herein, with the intent to promote or aid the commission of an offense, did agree with one or more persons, both known and unknown to the State Grand Jury, that at least one of them or another person would engage in conduct constituting the offenses, in particular:

- 1) **FRAUDULENT SCHEMES AND ARTIFICES**, in violation of A.R.S. § 13-2310.

In furtherance of this conspiracy and to effect the foregoing objects thereof, these defendants and their co-conspirators did commit numerous overt acts, including but not limited to the overt acts described in Count 3 of this Indictment (which are incorporated herein by reference as if set forth in full), in violation of A.R.S. §§ 13-1003, 13-2310, 13-2301, 13-303, 13-301, 13-701, 13-702, and 13-801.

COUNT 2

ILLEGALLY CONDUCTING AN ENTERPRISE

A. On or between about December 16, 2020 and May 13, 2021, **AMERA SOLIMAN GHANNAM A.K.A AMERA S. SAADELDIN** and **RAWA A. SAYAH**, defendants herein, employed by or associated with an enterprise, did knowingly conduct such enterprise's affairs through racketeering or did knowingly participate directly or indirectly in the conduct of the enterprise which they knew was being conducted through racketeering.

B. The enterprise was a group of persons associated in fact, including but not limited to **AMERA SOLIMAN GHANNAM A.K.A AMERA S. SAADELDIN** and **RAWA A. SAYAH**.

C. The racketeering included:

- 1) **FRAUDULENT SCHEMES AND ARTIFICES**, a Class 2 Felony, in violation of A.R.S. § 13-2310.

The racketeering included but was not limited to, the acts of racketeering described in Count 3 of this Indictment (which are incorporated herein by reference as if set forth in full), in violation of A.R.S. §§ 13-2312(B), 13-2301, 13-2310, 13-701, 13-702, 13-801 and 13-811.

COUNT 3

FRAUDULENT SCHEMES AND ARTIFICES

On or between December 16, 2020, and May 13, 2021 **AMERA SOLIMAN GHANNAM A.K.A AMERA S. SAADELDIN** and **RAWA A. SAYAH**, pursuant to a scheme or artifice to defraud, knowingly obtained a benefit (to wit: \$314,805.11) by means of false or fraudulent pretenses, representations, promises or material omissions, in violation of A.R.S. §§ 13-2310, 13-2301, 13-701, 13-702, 13-801, and 13-804.

COUNT 4

ILLEGALLY CONDUCTING AN ENTERPRISE

A. On or between about December 16, 2020 and January 18, 2022, **AMERA SOLIMAN GHANNAM A.K.A AMERA S. SAADELDIN**, defendant herein, employed by or associated with an enterprise, did knowingly conduct such enterprise's affairs through

racketeering or did knowingly participate directly or indirectly in the conduct of the enterprise which they knew was being conducted through racketeering.

B. The enterprise was a group of persons associated in fact, including but not limited to **AMERA SOLIMAN GHANNAM A.K.A AMERA S. SAADELDIN**.

C. The racketeering included:

1) **FRAUDULENT SCHEMES AND ARTIFICES**, a Class 2 Felony, in violation of

A.R.S. § 13-2310.

The racketeering included but was not limited to, the acts of racketeering described in Count 5 of this Indictment (which are incorporated herein by reference as if set forth in full), in violation of A.R.S. §§ 13-2312(B), 13-2301, 13-2310, 13-701, 13-702, 13-801, and 13-811.

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COUNT 5


FRAUDULENT SCHEMES AND ARTIFICES

On or between May 30, 2021, and January 18, 2022, **AMERA SOLIMAN GHANNAM A.K.A AMERA S. SAADELDIN**, pursuant to a scheme or artifice to defraud, knowingly obtained a benefit (to wit: \$861,368.96) by means of false or fraudulent pretenses, representations, promises or material omissions, in violation of A.R.S. §§ 13-2310, 13-2301, 13-701, 13-702, 13-801, and 13-804.


Pursuant to A.R.S. § 21-425, the State Grand Jurors find that the offenses described above were committed in Maricopa County, Arizona.

A True Bill
(A "True Bill")

KRISTIN K. MAYES
ATTORNEY GENERAL
STATE OF ARIZONA



CATIE KELLEY
Assistant Attorney General

Dated: 03/15/2023


Foreperson of the State Grand Jury