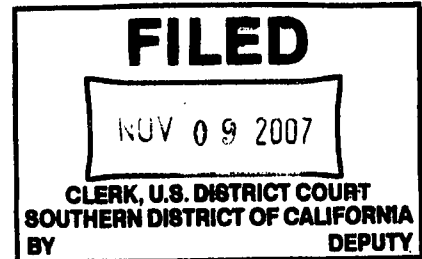


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ORIGINAL



UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

'07 CR 2918H

UNITED STATES OF AMERICA, )

Plaintiff, )

v. )

ALEJANDRO LOPEZ (1) )  
EMILIO LOPEZ (2) )  
RAVINDERJIT SINGH SEKHON (3) )  
LINDA VELASQUEZ (4), )

Defendants. )

Criminal Case No.

I N F O R M A T I O N

Title 18, U.S.C. Sec. 371 -  
Conspiracy to Commit Wire Fraud;  
Title 18, U.S.C. Sec. 981  
(A)(1)(C) and Title 28, U.S.C.  
Sec. 2461(c) - Forfeiture

The United States Attorney charges:

INTRODUCTORY ALLEGATIONS

At all times relevant to this Information:

1. Defendant Alejandro Lopez (Defendant A. Lopez) and his brother, Defendant Emilio Lopez (Defendant E. Lopez), headed, managed, and supervised the "Lopez Team," which consisted of, among

1 others, real estate agents and loan officers who conducted real  
2 estate and loan broker activities, including Defendants Ravinderjit  
3 Singh Sekhon (Defendant Sekhon) and Defendant Linda Velasquez  
4 (Defendant Velasquez). From in or about November 2002 until in or  
5 about November 2004, the Lopez Team worked at the Century 21 Homes  
6 First office, located at 904 West San Marcos Boulevard, San Marcos,  
7 California. After in or about November 2004, the Lopez Team worked  
8 at the Century 21 ElDorado office (ElDorado), located at 295 South  
9 Rancho Santa Fe Road, San Marcos, California. The co-owners of  
10 ElDorado were Defendant A. Lopez, Defendant E. Lopez, and the two  
11 principals of Century 21 Homes First.

12 2. In addition to acting as real estate agents, the Lopez Team  
13 originated and brokered mortgage loans for its clients, obtaining  
14 funding from several sub-prime mortgage lenders. The sub-prime  
15 lenders offered "stated income" or "no income verification" loans at  
16 higher interest rates than conventional loans.

17 3. Defendant A. Lopez, a California-licensed real estate  
18 broker, was the Sales Manager of ElDorado and supervised the day-to-  
19 day operations of the Lopez Team. He was the Chief Financial Officer  
20 and designated licensed officer of Applied Investments, Inc. and was  
21 the President and designated licensed officer of National Award  
22 Funding, Inc. The Lopez Team received commissions for its real estate  
23 and loan broker activities through payments to Applied Investments,  
24 Inc. and National Award Funding, Inc.

25 4. Defendant E. Lopez, a California-licensed real estate  
26 salesman, directed the Lopez Team's marketing efforts and assisted  
27 in the supervision of its operations. Defendant E. Lopez was the  
28 President of Applied Investments, Inc.



1 elsewhere, Defendants Alejandro Lopez, Emilio Lopez, Ravinderjit  
2 Singh Sekhon, and Linda Velasquez, did knowingly conspire with each  
3 other and others known and unknown to commit wire fraud, by knowingly  
4 devising and intending to devise and carrying out a material scheme  
5 and artifice to defraud and to obtain money and property by means of  
6 materially false and fraudulent pretenses, representations, and  
7 promises and the intentional concealment and omission of material  
8 facts, and for the purpose of executing this fraudulent scheme, did  
9 knowingly use and cause to be used writings, signs, signals, and  
10 sounds to be transmitted by wire in interstate commerce; in violation  
11 of Title 18, United States Code, Section 1343.

12 Manners and Means

13 9. To further the conspiracy and effect the objects thereof,  
14 the Defendants utilized the following manner and means, among others:

15 a. attended events, including swap meets, and advertized  
16 in Spanish language newspapers and publications and on Spanish  
17 language radio stations to induce low income individuals from  
18 Hispanic communities to utilize the Lopez Team's fraudulent real  
19 estate and loan broker services.

20 b. fraudulently induced financially unqualified clients  
21 to disclose personal and financial information knowing that the Lopez  
22 Team would later alter the information on loan applications and other  
23 documents to meet the lenders' loan requirements.

24 c. entered personal and financial data provided by the  
25 clients into the Lopez Team database knowing that the Lopez Team  
26 would later fraudulently alter the information on loan applications  
27 and other documents to meet lenders' loan requirements.

28

1           d. fraudulently submitted to lenders loan applications  
2 that contained inflated incomes for clients and documents that  
3 falsely verified the inflated incomes.

4           e. fraudulently submitted to lenders loan applications  
5 that contained false employment information which the Lopez Team and  
6 others falsely verified in writing and by impersonating employers.

7           f. fraudulently purchased from tax preparers, and  
8 submitted to lenders, letters that misrepresented that the clients  
9 were business owners and that the tax preparers had prepared the  
10 clients' tax returns (CPA letters).

11           g. fraudulently submitted to lenders loan applications  
12 that contained inflated bank account balances which the Lopez Team  
13 falsely verified with fictitious verifications of deposits.

14           h. fraudulently caused banks to generate false  
15 verifications of deposits by depositing Lopez Team members' own  
16 personal funds into client bank accounts.

17           i. fraudulently altered and submitted to lenders bank  
18 statements that were not for the clients' bank accounts, including  
19 bank statements belonging to Defendant Sekhon, Defendant Sekhon's  
20 wife, and Defendant Velasquez.

21           j. fraudulently submitted to lenders loan applications  
22 and other documents, including false verifications of rent, which  
23 contained inflated rent amounts, false rent payment histories, and  
24 false lengths of residency for clients.

25           k. fraudulently listed or caused to be listed on  
26 documents submitted to, or accessed by lenders, the  
27 contact information for Lopez Team members and others, including  
28 Defendant Sekhon, Defendant Sekhon's wife, and Defendant Velasquez,

1 as the clients' landlords to falsely verify fictitious rental  
2 information.

3 l. fraudulently used third parties with higher credit  
4 scores as straw buyers to purchase homes and obtain loans for  
5 financially unqualified clients knowing that the third parties would  
6 not occupy the homes and that the loan applications would  
7 misrepresent that the homes would be "owner-occupied."

8 m. fraudulently prepared and submitted to lenders  
9 fictitious letters (purportedly from creditors), and caused credit  
10 agencies to make false entries to clients' credit reports, which  
11 falsely bolstered the clients' credit and falsely listed the  
12 telephone numbers of Lopez Team members and others, including  
13 Defendant Sekhon, Defendant Sekhon's wife, and Defendant Velasquez,  
14 as contacts for the creditors.

15 n. fraudulently submitted to lenders loan applications  
16 that falsely represented that clients were United States citizens.

17 o. fraudulently submitted to lenders copies of false  
18 social security cards which the Lopez Team altered to eliminate the  
19 work restriction language.

20 p. fraudulently obtained \$1,070,000.00 in loan  
21 commissions from the conspiracy.

22 OVERT ACTS

23 10. In furtherance of the conspiracy and to effect and  
24 accomplish the objects thereof, the following overt acts, among  
25 others, were committed within the Southern District of California,  
26 and elsewhere:

27 a. Between in or about February 2004 and November 2004,  
28 Defendant A. Lopez temporarily deposited his own money into clients'

1 bank accounts so that banks would issue fraudulent verifications of  
2 deposits.

3 b. On or about July 30, 2004, Defendant Velasquez signed  
4 a false name, falsely claimed to be a property manager, and provided  
5 her cellular telephone number as a contact number on a fictitious  
6 verification of rent form.

7 c. In or before August 2004, Defendant E. Lopez met with  
8 tax preparer A.R. and arranged for A.R. to prepare false CPA letters.

9 d. On or about August 31, 2004, Defendant E. Lopez  
10 temporarily deposited \$18,000 of his own money into a bank account  
11 to increase a client's bank account balance so that the client could  
12 meet a lender's cash requirements.

13 e. In or about November 2004, Defendant Sekhon altered  
14 bank statements belonging to his wife and included them in a client's  
15 loan file to qualify the client for a loan.

16 f. On or about December 6, 2004, Defendant Sekhon  
17 temporarily deposited \$23,000 of his own money into a client's bank  
18 account causing a bank to generate a false verification of deposit.

19 g. In or about February 2005, Defendant A. Lopez  
20 requested Defendant Velasquez to provide copies of her bank  
21 statements so that the Lopez Team could alter and use them for a  
22 client's loan file.

23 h. In or about February 2005, at Defendant A. Lopez's  
24 direction, Defendant Velasquez provided Defendant Sekhon with a copy  
25 of her bank statements so that Defendant Sekhon could use them in a  
26 client's loan file.

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1 property of the defendants up to the value of the said property  
2 described above as being the subject of forfeiture.

3 DATED: *Oct 18, 2007*

4 KAREN P. HEWITT  
United States Attorney

5 *[Handwritten signature]*

6 YESMIN E. SAIDE  
7 Assistant United States Attorney

8 *[Handwritten signature]*

9 VALERIE H. CHU  
Assistant United States Attorney

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