

**FILED**

JAN 06 2010

CLERK, U.S. DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA  
BY AS  
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IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF CALIFORNIA

12 UNITED STATES OF AMERICA, ) Case No. 1:10 CR 00002 AWL  
13 )  
14 Plaintiff, ) VIOLATIONS: 18 U.S.C. §§ 1343  
15 v. ) and 2 - Wire Fraud and Aiding  
16 ) and Abetting (Two Counts)  
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LESLIE SLUGA, )  
Defendant. )

INFORMATION

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2 COUNTS ONE and TWO: [18 U.S.C. §§ 1343 and 2 - Wire Fraud  
and Aiding and Abetting]

3 The United States Attorney charges:

4 LESLIE SLUGA,

5 defendant herein, as follows:

6 I. INTRODUCTION

7 1. At all times relevant to this Information,  
8 Defendant LESLIE SLUGA was a resident of Bakersfield, California,  
9 located in the State and Eastern District of California.

10 2. At all times relevant to this Information, Crisp Cole  
11 Associates, also known as Crisp & Cole Real Estate ("CCRE"), was  
12 a real estate brokerage firm, and Tower Lending was an affiliated  
13 mortgage brokerage.

14 3. Between in or about October 2004 to in or about January  
15 2007, in the State and Eastern District of California, the  
16 defendant, along with others, executed a scheme and artifice to  
17 defraud mortgage loan companies and federally insured  
18 lending/financial institutions (collectively referred to herein  
19 as "Lenders") of money and property, and caused money and  
20 property to be obtained from such Lenders.

21 II. THE SCHEME TO DEFRAUD

22 4. During the above-described period, the defendant, with  
23 the assistance of others, executed the scheme and artifice to  
24 defraud Lenders by the following manner and means:

25 a. From April 2005 through May 2006, at the direction of  
26 one of the owners of CCRE, defendant purchased  
27 approximately three (3) real properties with a total  
28 purchase value at the time of approximately \$2.5

1 million, and obtained loans to finance such purchases.

2  
3 b. In order to qualify for these loans, in almost all of  
4 these loan applications that the defendant caused to be  
5 submitted to the Lenders, the defendant knowingly made  
6 material misstatements and/or omitted relevant and  
7 material information. The defendant knew and expected  
8 that the Lenders would reasonably rely on such  
9 misstatements and omissions in approving the funding of  
10 the mortgage loans for defendant's purchases of real  
11 property.

12 c. The defendant's misstatements and omissions included,  
13 but are not limited to, misstatements concerning her  
14 employer, the number of years employed, and her  
15 position/title with the employer; misstatements  
16 regarding her income and her outstanding liabilities  
17 (including her liabilities with respect to other real  
18 properties); and misstatements that she would use  
19 certain properties as owner-occupied residences when in  
20 fact she had no intent to reside in the properties.

21 d. In or around October 2005, the defendant submitted a  
22 loan application to SunTrust Mortgage for the purchase  
23 of the real property located at 800 Astoria Park Drive,  
24 Bakersfield, California ("800 Astoria Park Property").  
25 In the loan application, the defendant knowingly, and  
26 with the intent to defraud, failed to list the total  
27 outstanding obligations she had on other real  
28 properties she then owned. As a result of the material

1 false and fraudulent information the defendant provided  
2 to SunTrust Mortgage, SunTrust Mortgage disbursed  
3 approximately \$374,000 in funds for the purchase of the  
4 800 Astoria Park Property.  
5

6 5. The defendant and others at CCRE and Tower Lending knew  
7 that the misstatements and/or omissions that the defendant and  
8 others caused to be submitted to Lenders in connection with the  
9 mortgage loan applications were materially false and fraudulent.  
10 The mortgage loans funded on the basis of such applications were  
11 knowingly obtained through materially false and fraudulent  
12 statements.

13 6. As a result of the conduct of the defendant and others,  
14 the defendant defrauded Lenders of approximately \$912,556.

15 IV. WIRE COMMUNICATIONS

16 7. On or about the date listed below, within the State and  
17 Eastern District of California and elsewhere, in furtherance of  
18 the scheme and artifice to defraud, and to obtain monies through  
19 false and fraudulent pretenses, and to aid and abet the same, as  
20 more fully set forth in paragraphs 1 through 6 above, the  
21 defendant caused, and aided and abetted in causing, the following  
22 signs and signals to be transmitted by means of wire and radio  
23 communications in interstate commerce:

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<u>Count</u>	<u>Approx. Date Transmitted</u>	<u>Description</u>
1	October 5, 2005	Wire transfer of \$297,033.09 from SunTrust Mortgage in Georgia, to Chicago Title Company in Bakersfield, CA
2	October 5, 2005	Wire transfer of \$74,132.64 from SunTrust Mortgage in Georgia, to Chicago Title Company in Bakersfield, CA

All in violation of Title 18, United States Code, Sections 1343 and 2.

Dated: January \_\_, 2010

Respectfully submitted,

BENJAMIN B. WAGNER  
United States Attorney

By: Sheila K. Oberto

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