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FILED

JUN 10 2010

CLERK, U.S. DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA
BY [Signature]
DEPUTY CLERK

8 IN THE UNITED STATES DISTRICT COURT
9 FOR THE EASTERN DISTRICT OF CALIFORNIA

10
11 UNITED STATES OF AMERICA,) CASE NO. 10 CR 00248 LJO
12)
Plaintiff,)
13 v.) VIOLATIONS: 18 U.S.C. § 1343 -
U.S.C. § 1341 - Mail Fraud; 18
14 GEORGE M. EGGLESTON,) U.S.C. § 982(a)(2)(A) - Criminal
Defendant.) Forfeiture.
15)
16)

17
18 I N D I C T M E N T

19 COUNTS ONE - FIVE: [18 U.S.C. § 1343 - Wire Fraud]

20 The Grand Jury charges:

21 GEORGE M. EGGLESTON,

22 defendant herein, as follows:

23 I. INTRODUCTION

24 1. At all times relevant to this Indictment, defendant GEORGE
25 M. EGGLESTON, doing business as NEXXUS, aka Private Solutions Group
26 (hereinafter NEXXUS) and its reported agent/affiliate, GLOBAL LEGAL
27 ASSOCIATES, was purportedly in the business of rescuing homeowners
28

1 from foreclosure. NEXXUS and GLOBAL LEGAL ASSOCIATES were an alter-
2 ego of defendant GEORGE M. EGGLESTON and were used in furtherance of a
3 collective scheme and artifice to defraud property owners nearing
4 foreclosure. The primary objective of the scheme and artifice to
5 defraud was to obtain money from property owners via wire transfers by
6 means of false pretenses, representations, and misrepresentation of
7 services.

8 II. THE SCHEME TO DEFRAUD

9 2. Defendant GEORGE M. EGGLESTON, doing business as NEXXUS and
10 GLOBAL LEGAL ASSOCIATES, devised a scheme and artifice to defraud, and
11 to obtain money by means of material false and fraudulent
12 representations; specifically, he devised a "foreclosure
13 stoppage/rescue" scheme targeted at property owners nearing
14 foreclosure. In furtherance of the scheme and artifice to defraud,
15 the defendant GEORGE M. EGGLESTON, doing business as NEXXUS and GLOBAL
16 LEGAL ASSOCIATES made materially false and fraudulent pretenses,
17 representations and promises, including but not limited to:

18 a). Representations via website
19 <http://www.stopandreverseyourforeclosure.com/> that state: "Is your
20 property about to go into foreclosure," "Would you like to continue to
21 stay in your property" and "Would you like to stop and/or reverse the
22 foreclosure of your property? If so, Nexxus Private-Solutions Group
23 may be your solution. . . . Regardless of whether your home is in
24 foreclosure currently, or has already been foreclosed upon, the
25 Private-Solutions Group at Nexxus can help you achieve these
26 objectives;"

27 b). Representations via the above website that state: "Nexxus
28 provides Personal Affairs Management to individuals and entities in

1 order to help them with difficult and challenging situations,
2 including but not limited to, situations where their home or other
3 real property is either in the process of being foreclosed upon, or
4 already has been foreclosed upon. This is done by the prospective
5 Client engaging Nexxus as their Personal Affairs Manager to deal with
6 specific issues they may be facing;" and

7 c). Representations via the above website that "In the case of a
8 pending or completed foreclosure, Nexxus as their Personal Affairs
9 Manager, uses and manages attorneys who file one or more lawsuits
10 against the foreclosing lender, for violations of State and Federal
11 laws('the Lawsuit'). Such Lawsuit seeks a judgment against the
12 foreclosing Trust Deed Holder that stops and/or reverses any pending
13 or completed foreclosure, and quiets title to the Property."

14 III. MANNER AND MEANS OF THE SCHEME AND ARTIFICE TO DEFRAUD

15 3. It was part of the scheme and artifice to defraud that
16 defendant GEORGE M. EGGLESTON, doing business as NEXXUS and GLOBAL
17 LEGAL ASSOCIATES, would get referrals from individuals who marketed
18 NEXXUS and GLOBAL LEGAL ASSOCIATES to potential clients who were
19 property owners nearing foreclosure in California and elsewhere.

20 4. It was further part of the scheme and artifice to defraud
21 that defendant GEORGE M. EGGLESTON, doing business as NEXXUS and
22 GLOBAL LEGAL ASSOCIATES, fraudulently induced property owners to enter
23 into a contract called the "Nexxus Engagement." The terms of the
24 contract required property owners to sign an "Offer and Agreement" and
25 pay NEXXUS a monthly fee in the amount of \$1,000 per month for 60
26 months. Per the terms of the "Nexxus Engagement," the client would
27 sign a Power of Attorney giving NEXXUS authority to negotiate with
28 lenders and file lawsuits on their behalf.

1 5. It was further part of the scheme and artifice to defraud
2 that defendant GEORGE M. EGGLESTON, doing business as NEXXUS and
3 GLOBAL LEGAL ASSOCIATES, fraudulently induced property owners to wire
4 money into various bank accounts by notifying the property owners that
5 their Application was approved by NEXXUS and instructing them to wire
6 a \$2,000 initial retainer to NEXXUS at a bank specified in the
7 acceptance notification.

8 6. It was further part of the scheme and artifice to defraud
9 that defendant GEORGE M. EGGLESTON, doing business as NEXXUS and
10 GLOBAL LEGAL ASSOCIATES, fraudulently induced and caused property
11 owners to wire a combined total of more than \$100,000 into specified
12 bank accounts by sending each property owner a "Monthly Fee Statement"
13 which fraudulently induced the property owner to then wire \$1,000 per
14 month to NEXXUS at a bank specified in the fee statement.

15 7. It was further part of the scheme and artifice to defraud that
16 EGGLESTON, doing business as NEXXUS and GLOBAL LEGAL ASSOCIATES, made
17 material representations that induced clients to falsely believe that
18 as their private affairs manager and attorney, NEXXUS and GLOBAL LEGAL
19 ASSOCIATES could stay foreclosure actions by negotiating with lenders
20 and filing lawsuits against lenders for violations of law. Although
21 the website stated that "Nexxus as their Personal Affairs Manager,
22 uses and manages attorneys who file one or more lawsuits against the
23 foreclosing lender, for violations of State and Federal laws ('the
24 Lawsuit')," EGGLESTON, doing business as NEXXUS and GLOBAL LEGAL
25 ASSOCIATES, did not provide the above services, did not manage
26 attorneys who filed lawsuits against lenders for violations of state
27 and federal law, and did not comply with his material representations.
28 EGGLESTON used the money received from the client wire transfers for

1 personal expenditures.

2 8. Further, having devised and intending to devise a scheme and
3 artifice to defraud, and for the purpose of executing the scheme and
4 concealing such scheme and artifice, and attempting to do so,
5 defendant GEORGE M. EGGLESTON, doing business as NEXXUS and GLOBAL
6 LEGAL ASSOCIATES, caused to be filed Chapter 13 bankruptcy petitions
7 in the United States Bankruptcy Court for the Eastern District of
8 California, Fresno Division.

9 9. On or about the dates set forth below, in the Eastern
10 District of California and elsewhere, for the purpose of executing and
11 attempting to execute the aforementioned scheme and artifice to
12 defraud, defendant GEORGE M. EGGLESTON, doing business as NEXXUS and
13 GLOBAL LEGAL ASSOCIATES, did knowingly cause to be transmitted by
14 means of wire in interstate and foreign commerce, the writings, signs,
15 signals and sounds specified below:

<u>Count</u>	<u>Date</u>	<u>From</u>	<u>To</u>	<u>Contents of Wire Communication</u>
16 1	10/3/08	California	Nevada	Wire transfer to defendant's account of \$4,000 from K.O.'s account
17 2	10/6/08	California	Nevada	Wire transfer to defendant's account of \$2,000 from M.A.'s account
18 3	10/6/08	California	Nevada	Wire transfer to defendant's account of \$1,000 from A.R.'s account
19 4	11/3/08	California	Nevada	Wire transfer to defendant's account of \$1,000 from R.A.'s account

1 5 11/17/08 California Nevada Wire transfer to
2 defendant's account of
\$600 from A.R.'s account

3 All in violation of Title 18, United States Code, Section 1343.
4

5 COUNT SIX: [18 U.S.C. § 1341 - Mail Fraud]

6 The Grand Jury further charges:

7 GEORGE M. EGGLESTON,

8 defendant herein, as follows:

9 10. Paragraphs One through Nine of Counts One through Five of
10 the Indictment are incorporated herein as if fully set forth.

11 11. On or about February 14, 2007, in the Eastern District of
12 California and elsewhere, defendant GEORGE M. EGGLESTON, for the
13 purpose of obtaining money and property by means of materially false
14 and fraudulent representations and attempting to do so, caused to be
15 deposited a matter to be sent and delivered by a commercial interstate
16 carrier, to wit, EGGLESTON listed a false social security number on a
17 mortgage loan application and stated the property was to be his
18 primary residence when in fact he knew such representations were false
19 and caused mortgage loan documents to be sent from Fidelity National
20 Title in Bakersfield, California and delivered to SunTrust Mortgage,
21 Inc. in Laguna, California via California Overnight delivery causing a
22 loss of approximately \$261,000 to SunTrust Mortgage.
23

24 FORFEITURE ALLEGATION: [18 U.S.C. § 982(a)(2)(A)]

25 The Grand Jury further charges: THAT

26 12. Paragraphs One through Eleven, inclusive of Counts One
27 through Six, are fully incorporated by reference as though fully set
28 forth herein.

1 13. Pursuant to Title 18, United States Code, Section
2 982(a)(2)(A), upon conviction of the offenses in violation of Title
3 18, United States Code, Sections 1341 and 1343, defendant GEORGE M.
4 EGGLESTON, shall forfeit to the United States all property
5 constituting, or derived from, proceeds obtained directly or
6 indirectly as the result of such violations.

7 All pursuant to Title 18, United States Code, Section
8 982(a)(2)(A).

10 A TRUE BILL.

11 /s/ Signature on file w/AUSA
12 FOREPERSON

14 BENJAMIN B. WAGNER
15 United States Attorney

16 **KEVIN P. ROONEY** *for*

17 BY:
18 MARK E. CULLERS
19 Assistant U.S. Attorney
20 Chief, Fresno Office

No. _____


UNITED STATES DISTRICT COURT

Eastern District of California

Criminal Division

FILED

JUN 10 2010

CLERK, U.S. DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA
BY 
DEPUTY CLERK

THE UNITED STATES OF AMERICA

vs.

GEORGE M. EGGLESTON

INDICTMENT

1:10 CR 00248 LJO

VIOLATION(S): 18 U.S.C. § 1343 - WIRE FRAUD; 18 U.S.C. § 1341 - MAIL FRAUD; 18 U.S.C. § 982(a)(2)(A) - CRIMINAL FORFEITURE

A true bill,

151

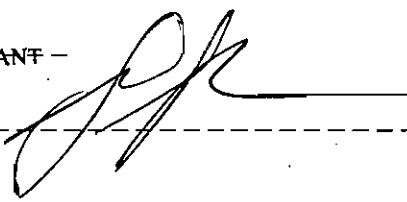
Foreman.

Filed in open court this _____ day

of _____, A.D. 20 _____

Clerk.

Bail, \$ ~~NO BAIL WARRANT~~



DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION -- IN U.S. DISTRICT COURT

By COMPLAINT INFORMATION INDICTMENT

Name of District Court, and/or Judge Magistrate Location (city)
**EASTERN DISTRICT OF CALIFORNIA
FRESNO, CALIFORNIA**

OFFENSE CHARGED
PLEASE SEE INDICTMENT

Petty
 Minor
 Misdemeanor
 Felony

Place of Offense

U.S.C. Citation
Please see Indictment

Kern County

**DEFENDANT -- U.S. vs.
GEORGE M. EGGLESTON**

Address { 110 CR 00248 LJO

Birth Date Male Alien
 Female (if applicable)

(Optional unless a juvenile)

PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)

SA Johnston/FBI

this person is awaiting trial in another Federal or State Court, give name of court.

this person/proceeding is transferred from another district per (circle one) FRCrP 20, 21, or 40. Show District

this is a reprosecution of charges previously dismissed which were dismissed on motion of:

U.S. Att'y Defense

SHOW DOCKET NO.

this prosecution relates to a pending case involving this same defendant

prior proceeding or appearance(s) before U.S. Magistrate regarding this defendant were recorded under

MAGISTRATE CASE NO.

Name and Office of Person Furnishing information on

THIS FORM

MARIA G. ROBLES

U.S. Att'y Other U.S. Agency

Name of Asst. U.S. Att'y

MICHELE THIELHORN

DEFENDANT

IS NOT IN CUSTODY

1) Has not been arrested, pending outcome this proceeding if not detained give date any prior summons was served on above charges

2) Is a Fugitive

3) Is on Bail or Release from (show District)

IS IN CUSTODY

4) On this charge

5) On another conviction Fed'l State

6) Awaiting trial on other charges
If answer to (6) is "Yes", show name of institution

Has detainer been filed? Yes No

If "Yes" give date

DATE OF ARREST ▶ Mo. Day Year

Or ... if arresting Agency & Warrant were not Federal

DATE TRANSFERRED TO U.S. CUSTODY ▶ Mo. Day Year

This report amends AO 257 previously submitted

ADDITIONAL INFORMATION OR COMMENTS

PENALTIES:

DEFN. BAIL STATUS: PLEASE ISSUE NO BAIL WARRANT

PENALTY SLIP

DEFENDANT: GEORGE M. EGGLESTON

VIOLATION: 18 U.S.C. § 1343 - Wire Fraud
(Counts One through Five)

PENALTY: 20 years imprisonment
\$250,000 fine
5 years supervised release

VIOLATION: 18 U.S.C. § 1341 - Mail Fraud

PENALTY: 20 years imprisonment
\$250,000 fine
5 years supervised release