

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION**

**UNITED STATES OF AMERICA** : **CASE NO. 1110CR 012**  
**v.** : **INFORMATION**  
**CHRISTOPHER GAGNON** : **18 U.S.C. § 1014**  
 : **18 U.S.C. § 2**

**COUNT ONE**

**THE UNITED STATES ATTORNEY CHARGES THAT:**

At all times material to this information:

1. E.D., a co-conspirator known to the United States Attorney, was self-employed as a tax preparer and interior designer. E.D. also owned a purported property management corporation called Rivendale Property Management Group, L.P., Maineville, Ohio (“Rivendale”).
2. B.K., a co-conspirator known to the United States Attorney, owned and operated a residential development construction business known as Long Cove Management, LLC, Mason, Ohio. B.K. was the builder/owner of the residence located at 8657 Emerald Isle, Mason, Ohio (“8657 Emerald Isle”).
3. Defendant **CHRISTOPHER GAGNON** was a client of E.D.
4. Washington Mutual Bank was a financial institution, the deposits of which were insured by the Federal Deposit Insurance Corporation, Certificate No. 32633.

6. Defendant **CHRISTOPHER GAGNON** knowingly made a false statement to Washington Mutual Bank to influence the bank's action on a loan when he purchased 8657 Emerald Isle by submitting Uniform Residential Loan Applications Form 1003 (which forms included supporting documentation) ("loan application") and HUD-1 Settlement Statements ("settlement statement") containing false information.

7. Defendant **CHRISTOPHER GAGNON** agreed to act as a straw buyer at E.D.'s request and purchase the properties in name only.

8. With defendant **CHRISTOPHER GAGNON's** knowledge and consent, E.D. completed the loan applications for the property in defendant **GAGNON's** name with fraudulent information, including false monthly income information and false supporting asset information.

9. Defendant **CHRISTOPHER GAGNON** knowingly signed each of the fraudulent loan applications and settlement statements upon which the bank relied to fund the loan.

10. On or about February 1, 2007, defendant **CHRISTOPHER GAGNON** signed a purchase contract to purchase the residence located at 8657 Emerald Isle for \$2,800,000.00. B.K. signed for the seller Long Cove Management, LLC.

12. On or about March 12, 2007, defendant **CHRISTOPHER GAGNON** signed a loan application in the amount of \$2,800,000.00 to purchase 8657 Emerald Isle. The loan application contained several false statements including but not limited to defendant **GAGNON's** monthly income of \$61,500 and that the property would be a primary residence.

13. On or about April 19, 2007, defendant **CHRISTOPHER GAGNON** signed a purchase contract, cancelling the February 1, 2007 purchase contract, to purchase the residence located at 8657 Emerald Isle for \$2,800,000.00. B.K. signed for the seller Long Cove Management, LLC.

14. On or about May 3, 2007, defendant **CHRISTOPHER GAGNON** signed a purchase contract to purchase the residence located at 8657 Emerald Isle to Gagnon for \$2,800,000.00 stating that defendant **GAGNON** paid a deposit of \$280,000.00 to B.K. when defendant **GAGNON** had not made any down payment at the signing of the contract.

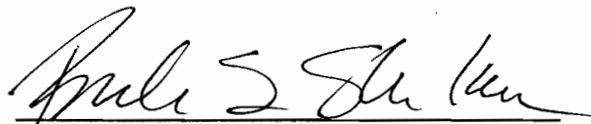
15. On or about July 25, 2007, defendant **CHRISTOPHER GAGNON** signed a loan application in the amount of \$2,080,000.00 and a loan application in the amount of \$347,300.00 to purchase 8657 Emerald Isle. The loan applications contained several false statements including but not limited to defendant **GAGNON**'s monthly income of \$61,500, assets from Rivendale Management of approximately \$1,250,000, and earnest money of \$280,000.00.

16. On or about July 25, 2007, a closing was held for 8657 Emerald Isle. At the closing, defendant **CHRISTOPHER GAGNON** signed a settlement statement for a loan of approximately \$2,080,000 to purchase 8657 Emerald Isle that contained false statements including but not limited to, the false representations that defendant **GAGNON** was the real buyer and that he had made a \$280,000 down payment when no down payment was made. The bank approved the loan. These same false statements were made to National City Bank, whose deposits were insured by the Federal Deposit Insurance Corporation, who approved a second mortgage in the amount of approximately \$347,300.00 for the purchase of 8657 Emerald Isle.

17. From at least in or about February 1, 2007 to on or about July 25, 2007, defendant **CHRISTOPHER GAGNON** knowingly made and caused to be made to Washington Mutual Bank a false statement for the purpose of influencing in any way the actions of Washington Mutual Bank and National City Bank upon an application, purchase, purchase agreement, and loan, that is, approval of two loans for the purchase of the property located at 8657 Emerald Isle and disbursements of loan proceeds the amount of approximately \$2,080,000.00 and \$347,300.00 with false statements as described in paragraphs 6 - 16 of the Information.

All in violation of Title 18, United States Code, Sections 1014 and 2.

**CARTER M. STEWART**  
**UNITED STATES ATTORNEY**

A handwritten signature in black ink, appearing to read "Brenda Shoemaker", written over a horizontal line.

**BRENDA SHOEMAKER**  
**FINANCIAL CRIMES CHIEF**