

IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF OKLAHOMA

FILED

APR 2 2009

ROBERT D. DENNIS, CLERK
U.S. DIST. COURT, WESTERN DIST. OF OKLA.
BY: *[Signature]*

UNITED STATES OF AMERICA,)

Plaintiff,)

-vs-)

DAWN QUIROGA,)

Defendant.)

No. **CR-09-102L**

Violations: 18 U.S.C. § 1957
26 U.S.C. § 7203

INFORMATION

The United States Attorney charges:

Introduction

At all times relevant to this Information:

1. **DAWN QUIROGA** lived in Edmond, Oklahoma, in the Western District of Oklahoma.
2. In approximately June 2006, **QUIROGA** began soliciting investors for a business she called Buyers Solutions Marketing, LLC (“BSM”).
3. **QUIROGA** told investors that BSM operated a down-payment-assistance program, meaning it provided short-term, high-interest loans for people to use as down payments when purchasing homes.
4. **QUIROGA** told the potential investors that their investments would be used to fund such down-payment-assistance loans and that the investors would receive a certain percentage return once the loans were repaid.

5. After hearing that pitch, numerous investors, relying on **QUIROGA's** statements, invested money in BSM. Many of those investors wired their money to **QUIROGA** using wires that were routed through other states.

6. Almost immediately after BSM came into existence, it became clear that it could not make money on down-payment-assistance loans.

7. Despite that fact, **QUIROGA** continued to solicit investors for BSM, falsely telling them that BSM was successfully conducting down-payment-assistance loans when, in fact, it was not.

8. Therefore, BSM became a Ponzi scheme, with **QUIROGA** using money from new investors to pay old investors. **QUIROGA** operated BSM that way for approximately two years. During that time, **QUIROGA** funneled large amounts of money out of BSM to buy personal items, such as new cars, a new home, furnishing and electronics for that home, and so on.

9. As a result of **QUIROGA's** scheme to defraud, dozens of investors lost money.

COUNT 1
(Money Laundering)

10. The United States Attorney incorporates by reference paragraphs 1 through 9.

11. On or about June 30, 2007, in the Western District of Oklahoma,

----- **DAWN QUIROGA,** -----

knowingly engaged in a monetary transaction, through a financial institution, affecting interstate commerce, in criminally derived property worth more than \$10,000.

Specifically, on that date, **QUIROGA** purchased a 2007 Nissan Titan, VIN#

1N6BA07C38N30940, from Bob Howard Nissan for \$54,209.50, using check number 2322 drawn on Bank of America account number xxxxxx7627, such money having been derived from her scheme to defraud described above in paragraphs 2 through 9.

All in violation of 18 U.S.C. § 1957.

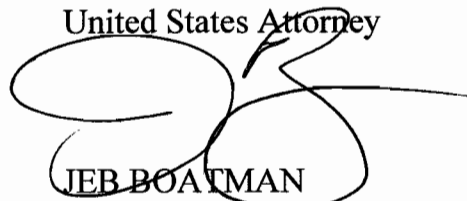
COUNT 2
(Failure to File — Misdemeanor)

12. On or about April 2008, in the Western District of Oklahoma,

----- **DAWN QUIROGA,** -----
failed to file an income tax return as required by law. Specifically, in tax year 2007, **QUIROGA** had earned over \$2,500,000 in gross income. Therefore, she was required by law to file an income tax return no later than April 17, 2008, setting forth her gross income and any deductions to which she was entitled. She failed to do so.

All in violation of 26 U.S.C. § 7203.

JOHN C. RICHTER
United States Attorney



JEB BOATMAN
Assistant U.S. Attorney

CRIMINAL COVER SHEET

U.S. District Court, Western District of Oklahoma

CR-09-102L

Petty Misdemeanor Felony

Case No.

Number of Counts 2 Number of Defendants 1

USAOID No. 2008R00402 By: lmc

Information Sealed: Yes No OCDEF: Yes No Notice Summons Writ Warrant to Issue

DEFENDANT: DAWN QUIROGA			
Alias(es):		Address: Broken Arrow, OK 74012	
		Phone:	
Age&DOB: 1969	SS#: xxx-xx-0433	Juvenile: Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Interpreter: Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
SEX: M <input type="checkbox"/> F <input checked="" type="checkbox"/>	RACE: White	Language/Dialect:	

Defendant Status:

<input checked="" type="checkbox"/> Not in Custody	Type of Bond Recommended on this Charge: OR <input type="checkbox"/> Cash <input type="checkbox"/> 10% <input type="checkbox"/> Unsecured <input type="checkbox"/> Surety <input type="checkbox"/>
Bond set at: \$ _____ Date: _____ Current Bond on Other Charge Federal <input type="checkbox"/> State <input type="checkbox"/>	Bond in Amount of: \$ _____
<input type="checkbox"/> In Jail at: _____ Under Prisoner/Register No.: _____	Detention <input type="checkbox"/>

Prior Proceedings or Appearance(s) Before U.S. Magistrate Judge:

Case No. M-	Government Motion to Detain: Yes <input type="checkbox"/> No <input type="checkbox"/>
Complaint: Yes <input type="checkbox"/> No <input type="checkbox"/>	Bond Set: _____ Date: _____

Related Case Information:

Previous Case No.	Rule 20/Rule 5 from District of:
Additional Defendants: Yes <input type="checkbox"/> No <input type="checkbox"/>	Total Number of defendants: APR - 2 2009

Attorney Information:

Defense Counsel: David Slane	AUSA: Jeb Boatman	ROBERT D. DENNIS CLERK, U.S. DISTRICT COURT BY _____ DEPUTY
Address: 901 BW 12th St. Oklahoma City, OK 73106	Phone: 405/553-8726	Fax: 405/553-8888
Phone: (405) 319-1800	Fax: _____	Federal Agent/Agency: SA Kevin Markey - FBI SA Grant Brannum - IRS-CID
Retained <input checked="" type="checkbox"/> CJA Panel <input type="checkbox"/> Public Defender <input type="checkbox"/>	Local Agent/Agency:	

Count(s)	USC Citation(s)	Offense(s) Charged	Penalty
1	18 USC § 1957	Money Laundering	NMT 10 yrs. imprisonment; NMT \$250,000.00 fine, o/b. \$100.00 SA; NMT 3 yrs. SR.
2	16 USC § 7203	Failure to File Tax Return	NMT 1 yr. imprisonment; NMT \$25,000.00 fine, o/b. \$25.00 SA; NMT 3 yrs. SR.

Date: 4/2/09

Signature of AUSA

