

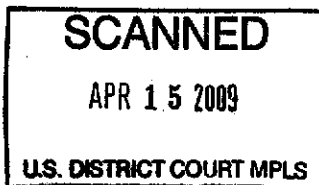
UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA,) INDICTMENT **CR 09-94 PAM/JJK**
)
Plaintiff,) (18 U.S.C. § 1343)
v.) (18 U.S.C. § 981(a)(C))
)
ANGELO MANCINI III,)
)
Defendant.)

THE UNITED STATES GRAND JURY CHARGES THAT:

COUNT 1
(Wire Fraud)

1. At all relevant times, defendant ANGELO MANCINI III was a resident of the state of Minnesota.
2. At all relevant times related to the charges set forth in this Indictment, City Mortgage Inc., was a corporation located in Little Canada, Minnesota in the business of obtaining mortgages for consumers.
3. Between approximately 2005 and 2007, defendant ANGELO MANCINI III worked part-time at City Mortgage, Inc. as a mortgage broker.
4. On or about September 19, 2006, ANGELO MANCINI III, applied for a loan for the re-finance of his residence located in St. Paul, Minnesota through City Mortgage. In order to accomplish this scheme, ANGELO MANCINI III provided materially false statements on the mortgage application including, but not limited to, misstating the nature of his employment and the scope of his income. A loan in the amount of \$163,709.80 was



FILED **APR 15 2009**
RICHARD D. SLETTEN, CLERK
JUDGMENT ENTERED _____
DEPUTY CLERK'S INITIALS _____

approved by BNC Mortgage based upon the false information provided by the defendant regarding his income and employment.

5. On or about November 24, 2006, in the State and District of Minnesota, the defendant,

ANGELO MANCINI III,

for the purpose of executing the above-described scheme and artifice, did knowingly cause to be transmitted in interstate commerce certain signs and signals by wire, namely a wire transfer of \$163,709.80 sent in interstate commerce from a BNC Mortgage bank account in New Jersey to a Land Title Company account in Minnesota; all in violation of Title 18, United States Code, Section 1343.

FORFEITURE ALLEGATIONS

6. The Grand Jury realleges and incorporates paragraphs 1 through 5 of the Indictment, and makes it a part of these forfeiture allegations.
7. As the result of the offenses alleged in Counts 1 through 3 of this Indictment, the defendant ANGELO MANCINI III, shall forfeit to the United States pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c), all his right, title and interest in any property constituting, or derived from, proceeds traceable to the violations of Title 18, United States Code, Sections 1341 and 1343.

8. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- (1) cannot be located upon the exercise of due diligence;
- (2) has been transferred or sold to, or deposited with, a third person;
- (3) has been placed beyond the jurisdiction of the Court;
- (4) has been substantially diminished in value; or
- (5) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1) and by Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of said defendant up to the value of the above forfeitable property. All in violation of Title 18, United States Code, Sections 981(a)(1)(C), 982(a)(1), 1343, and Title 28, United States Code, Section 2461(c).

A TRUE BILL

UNITED STATES ATTORNEY

FOREPERSON