

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

United States Courts
Southern District of Texas
FILED

AUG - 9 2006

Michael N. Milby, Clerk

UNITED STATES OF AMERICA §
 §
V. § CRIMINAL NO. H-06-98-SS
 §
MICHAEL D. GOODSON §
NANCY BOOTH §
 aka Nancy Campbell §
LESLIE R. TARRANCE, Sr. §
 aka Les Tarrance §

SECOND SUPERSEDING INDICTMENT

COUNT ONE

A. INTRODUCTION

At all times material to this Indictment:

1. MICHAEL D. GOODSON, NANCY BOOTH and LESLIE TARRANCE, Sr. participated in a mortgage fraud scheme in the Houston, Texas area.

2. Aames Funding Corporation d.b.a. Aames Home Loan, Argent Mortgage, BNC Mortgage, Inc., Decision One Mortgage, First Magnus Financial Corporation, IndyMac Bank, Long Beach Mortgage Company, New Century Mortgage Corporation, Wells Fargo Home Mortgage and Residential Mortgage were “Lenders” engaged in interstate commerce and in the business of providing residential loans.

3. MICHAEL D. GOODSON operated in the Houston, Texas area under many business names including but not limited to Anointed Designs, MGN Construction, MGN Management, Boston Interiors & Design, B&H Industries, B&H Management, North Houston Property Management, Global Enterprises Development, and Niponn Inc.
4. NANCY BOOTH operated in the Houston, Texas area as a loan processor and loan officer for a mortgage brokerage firm.
5. LESLIE TARRANCE, Sr. operated in the Montgomery County, Texas as a custom home builder under the name Ultra Classic Custom Homes, Inc, and Ultra Classic Homes III, Inc. among others.

B. THE CONSPIRACY

From in or about September 2000 and continuing through March 30, 2006, in the Southern District of Texas, and elsewhere, the defendants,

MICHAEL D. GOODSON
NANCY BOOTH
aka Nancy Campbell
LESLIE R. TARRANCE, SR.
aka Les Tarrance

did knowingly combine, conspire, confederate and agree with each other and others known and unknown to the Grand Jury to commit the following offenses against the United States:

- a. To knowingly devise and intend to devise a scheme and artifice

to defraud, and for obtaining money by means of false and fraudulent pretenses, representations, and promises, and to knowingly use and cause to be used the United States mails and private and commercial interstate carriers for the purpose of executing the scheme and artifice to defraud, in violation of Title 18, United States Code, Section 1341;

- b. To knowingly devise and intend to devise a scheme and artifice to defraud, and for obtaining money by means of false and fraudulent pretenses, representations, and promises, and to knowingly use and cause to be used interstate wire communications facilities in carrying out the scheme to defraud, in violation of Title 18, United States Code, Section 1343;

C. MANNER AND MEANS OF THE CONSPIRACY

It was a part of the conspiracy that:

1. MICHAEL D. GOODSON would and did locate residential properties to purchase, (hereinafter “Properties”).
2. MICHAEL D. GOODSON would and did recruit, solicit and compensate individuals with good credit to act as “Buyers/Borrowers” (hereinafter “Borrowers”) in applications for residential mortgage loans to

purchase one or more of the Properties.

3. MICHAEL D. GOODSON would and did tell the Borrowers they were investing in real estate which would be managed by his property management company and he would ensure the mortgage and taxes were paid.

4. LESLIE R. TARRANCE, SR. would and did negotiate with MICHAEL D. GOODSON on behalf of Ultra Classic Custom Homes to sell properties to individuals recruited by MICHAEL D. GOODSON as Borrowers.

5. NANCY BOOTH would and did complete and cause to be completed Uniform Residential Loan Applications in the names of the Borrowers in her position as a licensed loan officer to attempt to obtain 100% financing of the Property's sales price.

6. NANCY BOOTH would and did find Lenders to fund the residential loans in the name of the Borrowers to purchase the Properties.

7. NANCY BOOTH would and did provide documentation to the Lenders stating that the Borrower intended to occupy the residence as their principle residence.

8. MICHAEL D. GOODSON and NANCY BOOTH would and did arrange for and provide false employment verification and rent or mortgage

verification to the Lender for Borrowers mortgage loan applications.

9. MICHAEL D. GOODSON and NANCY BOOTH would and did provide material false information to the Lenders including employment and income information, as well as statements the Borrower would occupy the residence as his or her principle residence.

10. MICHAEL D. GOODSON, NANCY BOOTH and LESLIE R. TARRANCE, SR. would and did provide and cause Lenders to be provided with documentation of escrow payments designed to mislead Lenders as to the true source of the funds.

11. MICHAEL D. GOODSON, NANCY BOOTH and LESLIE R. TARRANCE, SR. would and did misrepresent and cause the misrepresentation to Lenders that escrow money had in fact been paid.

12. MICHAEL D. GOODSON would and did receive money from the Seller's proceeds at the loan closing by submitting an invoice as a second lien or note under a business name such as MGN Construction or Boston Interiors & Design.

13. LESLIE R. TARRANCE, SR. would and did provide funds to MICHAEL D. GOODSON after the closing of each of the Properties sold by Ultra Classic Custom Homes to Borrowers, either from seller proceeds via the Title Company or by a check written on the bank account of Ultra

Classic Custom Homes.

14. MICHAEL D. GOODSON would and did cause bank accounts to be opened in the Houston, Texas area under his business names for purposes including the deposit and transfer of proceeds of each fraudulently-induced loan and to pay individuals who provided services necessary to promote and perpetuate the scheme.

15. MICHAEL D. GOODSON would and did authorize and cause some of the fraudulently-induced loan proceeds to be transferred from his business bank accounts to make mortgage payments to Lenders, and to purchase cashiers checks which were submitted to the Title Companies as the Borrower's down payment.

16. MICHAEL D. GOODSON and NANCY BOOTH would and did prepare, authorize and disseminate, through the United States mail and commercial courier services and through interstate wire communications, to individuals and entities, including Lenders and their agents, in locations throughout the United States, false and fraudulent statements and other information regarding the creditworthiness of each Borrower and other information about each Borrower, all of which the Defendants knew and had reason to believe would be material to the Lenders' decisions to fund the mortgage loans.

D. OVERT ACTS

In furtherance of the conspiracy described in Count One and to effect the objects thereof, the defendants named therein and other persons both known and unknown to the grand jury, performed or caused the performance of one or more of the following Overt Acts, among others not described herein, in the Southern District of Texas and elsewhere on or about the following dates:

1. On or about March 27, 2003, MICHAEL D. GOODSON, filed a certificate of operation under the name MGN Construction in the Assumed Name Records of the Harris County, Texas County Clerk.

212 West Pines Drive, Montgomery, Texas

2. In or about March 2003, LESLIE R. TARRANCE, SR., signed, as the President of Ultra Classic Homes, Inc., a Residential Sale Contract to sell 212 West Pines Drive, Montgomery, Texas to the Borrower for \$329,500.00 and \$7,000 in Earnest Money.

3. On or about April 2, 2003, LESLIE R. TARRANCE, SR., signed as the seller, a U.S. Department of Housing and Urban Development settlement statement for the closing of the loan to purchase the Property located at 212 West Pines Drive, Montgomery, Texas.

4. On or about April 2, 2003, MICHAEL D. GOODSON and

LESLIE R. TARRANCE, SR. caused \$33,719.00 to be transferred from Ultra Classic Custom Homes' proceeds from the sale of 212 West Pines Drive, Montgomery, Texas to MGN Construction.

228 West Pines Drive, Montgomery, Texas

5. On or about April 11, 2003, LESLIE R. TARRANCE, SR. signed as the President of Ultra Classic Custom Homes, Inc., a Residential Sale Contract to sell 228 West Pines, Drive, Montgomery, Texas to the Borrower for \$355,000.00 and \$8,500 in Earnest Money.

6. On or about May 9, 2003, LESLIE R. TARRANCE, SR., signed as the seller, a U.S. Department of Housing and Urban Development settlement statement for the closing of the loan to purchase the Property located at 228 West Pines Drive, Montgomery, Texas.

7. On or about May 9, 2003, MICHAEL D. GOODSON and LESLIE R. TARRANCE, SR. caused \$27,998.41 to be transferred from Ultra Classic Custom Homes' proceeds from the sale of 228 West Pines Drive, Montgomery, Texas to MGN Construction.

31 Fairway Park, Montgomery, Texas

8. On or about April 8, 2003, LESLIE R. TARRANCE, SR. signed as the President of Ultra Classic Custom Homes, Inc., a Residential Sale Contract to sell the property located at 31 Fairway Park, Montgomery,

Texas to the Borrower for \$496,000 and \$10,000 in Earnest Money.

9. On or about May 20, 2003, LESLIE R. TARRANCE, SR. signed a letter stating Ultra Classic Custom Homes, Inc. had received \$10,000 in Earnest Money from the Borrower and the money had been booked.

10. On or about June 26, 2003, NANCY BOOTH and MICHAEL D. GOODSON caused Aames Funding Corp, dba Aames Home Loan, to wire transfer \$399,401.54 and \$99,030.14 respectively from Bank of the West in California to Woodforest National Bank in Texas to fund the purchase of the Property located at 31 Fairway Park, Montgomery, Texas.

11. On or about June 27, 2003, MICHAEL D. GOODSON and LESLIE R. TARRANCE, SR. caused \$34,548.34 from Ultra Classic Custom Homes' proceeds from the sale of the Property located at 31 Fairway Park, Montgomery, Texas to be transferred to the bank account of MGN Construction at Woodforest National Bank in Houston, Texas.

12. On or about June 27, 2003, MICHAEL D. GOODSON and NANCY BOOTH caused Stewart Title Company to send to Aames Home Loan, via United Parcel Service, a commercial carrier, closing documents from the loan closing of the Property located at 31 Fairway Park, Montgomery, Texas.

810 Plum Hollow Drive, College Station, Texas

13. On or about June 19, 2003, NANCY BOOTH caused the Uniform Residential Loan Application for the loan to purchase the Property located at 810 Plum Hollow Drive, College Station, Texas to falsely reflect the Borrower was employed as a structural engineer by Anointed Designs, 3606 Vashon Lane, Spring, Texas with a monthly income of \$8,600.

14. On or about June 20, 2003, MICHAEL D. GOODSON, signed a rent verification form as the Vice President of B&H Management in Rosenberg, Texas verifying to the Lender that the Borrower for the Property located at 810 Plum Hollow Drive, College Station, Texas was a renter in good standing.

15. On or about July 3, 2003, MICHAEL D. GOODSON, caused an invoice in the amount of \$63,500 for MGN Construction, 19723 Teller Blvd., Spring, Texas to be provided to the Brazos County Abstract Company for the closing of the mortgage loans for the Property located at 810 Plum Hollow Drive, College Station, Texas.

16. On or about July 7, 2003, MICHAEL D. GOODSON and NANCY BOOTH, caused Brazos County Abstract Company to ship to Aames Home Loan, by United Parcel Service, a commercial carrier, the closing documents for the Property located at 810 Plum Hollow Drive,

College Station, Texas.

63 Fairway Park, Montgomery, Texas

17. On or about June 4, 2003, LESLIE R. TARRANCE, SR. signed as the President of Ultra Classic Custom Homes, Inc., a Residential Sale Contract to sell the property located at 63 Fairway Park, Montgomery, Texas to the Borrower for \$635,000 and \$63,500 in Earnest Money.

18. In August 2003, NANCY BOOTH caused to be sent to Aames Home Loan, the Lender for the Property located at 63 Fairway Park, Montgomery, Texas, a Uniform Residential Loan Application which represented the Borrower had been employed at B&H Industries, 19723 Teller Blvd., Spring, Texas for the past four years and earns \$14,000 a month.

19. On or about August 5, 2003, NANCY BOOTH, notified a representative of Aames Home Loan that the Borrower on the Property located at 63 Fairway Park, Montgomery, Texas was leasing his home in South Carolina to Mike Goodson.

20. On or about August 18, 2003, MICHAEL D. GOODSON, caused Official Check 961576578 drawn on Regions Bank on August 4, 2003 payable to the seller of the property located at 63 Fairway Park, Montgomery, Texas in the amount of \$200.00 to be altered to reflect an

amount of \$42,000.00.

21. On or about August 19, 2003, NANCY BOOTH, sent to Aames Home Loan by facsimile, a copy of Regions Bank Official Check 961576578 in amount of \$42,000 payable to the seller of the property located at 63 Fairway Park, Montgomery, Texas, as verification of a portion of the deposit for closing of the loan.

22. On or about August 26, 2003, MICHAEL D. GOODSON caused a certificate of operation under the name of Boston Interiors & Design, 19723 Teller Blvd., Spring, Texas to be filed in the Assumed Name Records of the Jefferson County, Texas Clerk's office.

23. On or about August 26, 2003, MICHAEL D. GOODSON caused a bank account in the name of Boston Interiors & Design to be opened at Washington Mutual Bank.

24. On or about August 28, 2003, MICHAEL D. GOODSON and NANCY BOOTH caused Aames Funding Corp, d.b.a. Aames Home Loan, to wire transfer from Bank of the West in California to Woodforest Bank in Texas \$578,434.88 to fund the mortgage loan for the Property located at 63 Fairway Park, Montgomery, Texas.

25. On or about August 28, 2003, MICHAEL D. GOODSON and LESLIE R. TARRANCE, SR. provided the Borrower for 63 Fairway Park,

Montgomery, Texas \$21,500 in cash.

26. On or about August 28, 2003, MICHAEL GOODSON and LESLIE R. TARRANCE, SR. caused the Borrower to obtain an official check from Regions Bank payable to Ultra Classic Homes in the amount of \$21,500 as a part of the earnest money for the purchase of the Property located at 63 Fairway Park, Montgomery, Texas.

27. On or about August 28, 2003, LESLIE R. TARRANCE, SR. caused the withdrawal of approximately \$7,790.16 from the Woodforest Bank account of Ultra Classic Custom Homes, Inc. and the purchase of a cashier's check in the amount of \$7,790.16 payable to the title company for Borrower's settlement costs at closing.

3606 Vashon Lane, Spring, Texas

28. On or about September 15, 2003, MICHAEL D. GOODSON and NANCY BOOTH caused a Verification of Rent form to be completed indicating the Borrower for the Property located at 3606Vashon Lane, Spring, Texas was a tenant in good standing at 9114 Crown Jewel, Richmond, Texas.

29. On or about October 30, 2003, MICHAEL D. GOODSON and NANCY BOOTH caused Fidelity National Title Agency to ship to Long Beach Mortgage Company, by Airborne Express, a commercial carrier, the

closing documents for the Property located at 3606 Vashon Lane, Spring, Texas.

25322 Piney Bend, Spring, Texas

30. On or about October 14, 2003, NANCY BOOTH signed a Uniform Residential Loan Application indicating she conducted a face-to-face interview with the Borrower, for a mortgage loan in the amount of \$368,000 to purchase as the Borrower's primary residence the Property located at 25322 Piney Bend, Spring, Texas.

31. On or about November 21, 2003, MICHAEL D. GOODSON and NANCY BOOTH caused First Magnus Financial, to wire from Washington Mutual in California \$91,764.57 and \$369,941.67 Southwest Bank of Texas to fund the loans to purchase the Property located at 25322 Piney Bend, Spring, Texas.

9627 Stonebridge Place, Tomball, Texas

32. On or about October 14, 2003, NANCY BOOTH signed a Uniform Residential Loan Application indicating she conducted a face-to-face interview with the Borrower, for a mortgage loan in the amount of \$612,000 to purchase as the Borrower's primary residence the Property located at 9627 Stonebridge Place, Tomball, Texas.

33. On or about November 21, 2003, MICHAEL D. GOODSON

and NANCY BOOTH caused Long Beach Mortgage, to wire transfer from Washington Mutual Bank in California \$622,540.80 and \$152,561.30 respectively to Southwest Bank of Texas to fund the loans to purchase the Property located at 9627 Stonebridge Place, Tomball, Texas.

34. On or about November 21, 2003, NANCY BOOTH received a broker premium, also known as a yield spread premium of \$12,240.00 from Long Beach Mortgage for the closing of the mortgage loans on the Property located at 9627 Stonebridge Place, Tomball, Texas.

35. On or about November 21, 2003, MICHAEL D. GOODSON, caused the purchase from the Washington Mutual bank account of Boston Interiors & Design, a cashier's check in the amount of \$7,732.54 payable to the Seller of the Property located at 9627 Stonebridge Place, Tomball, Texas as the Borrower's down payment.

36. On or about November 21, 2003, MICHAEL D. GOODSON, caused an invoice for Boston Interiors & Design to be sent to Fidelity National Title Company in the amount of \$118,527.81 less a \$300 commission/marketing fee payable to the title company agent working on the closing of the mortgage loans for the Property at 9627 Stonebridge Place, Tomball, Texas.

178 Sentinel Point Court, The Woodlands, Texas

37. On or about September 15, 2003, LESLIE R. TARRANCE, SR. signed as the President of Ultra Classic Custom Homes, Inc., a Residential Sale Contract to sell the property located at 178 Sentinel Point Court, The Woodlands, Texas to an individual for \$685,000 and \$10,000 in Earnest Money.

38. On or about September 25, 2003, NANCY BOOTH sent a facsimile to LESLIE R. TARRANCE, SR. asking TARRANCE if the contract price should be changed to \$695,000 to cover the \$10,000 in earnest money.

39. On or about October 15, 2003, LESLIE R. TARRANCE, SR. signed as the President of Ultra Classic Custom Homes, Inc., a Residential Sale Contract to sell the property located at 178 Sentinel Point Court, The Woodlands, Texas to a different individual, the Borrower, for \$695,000 and \$10,000 in earnest money.

40. On or about November 10, 2003, NANCY BOOTH requested a representative of Fidelity National Title Company change the Borrower name on the open title file for the Property located at 178 Sentinel Point Court, The Woodlands, Texas to the same Borrower who purchased the Properties located at 25322 Piney Bend, Spring, Texas and 9627 Stonebridge Place, Tomball, Texas.

41. On or about December 17, 2003, NANCY BOOTH received a check from Fidelity National Title Company in the amount of \$16,147.50 after the closing of the mortgage loans to purchase the Property located at 178 Sentinel Point Court, The Woodlands, Texas.

42. On or about December 19, 2003, MICHAEL D. GOODSON and NANCY BOOTH caused Fidelity National Title Company to send by Airborne Express, a commercial carrier, closing documents to the Lender, Indy Mac Bank, on the Property located at 178 Sentinel Point Court, The Woodlands, Texas.

3132 Bentwater, Montgomery, Texas

43. On or about April 29, 2004, NANCY BOOTH signed a Uniform Residential Loan Application for a \$460,000 loan and another loan application for a \$115,000 loan for the Borrower to purchase 3132 Bentwater, Montgomery, Texas which applications reflect the Borrower was renting 8103 Hideaway Lake Circle, Spring, Texas.

44. On or about July 23, 2004 , LESLIE R. TARRANCE, SR. caused a check to be written on the bank account of Ultra Classic Custom Homes, Inc. payable to MICHAEL GOODSON in the amount of \$55,000

22 Hillock Woods, The Woodlands, Texas

45. On or about June 20, 2003, NANCY BOOTH caused the

Borrower's gross monthly base employment income amount stated on the Uniform Residential Loan Application to be increased from \$8,583.00 to \$17,000.00 in applying for mortgage loans totaling \$582,500 for the purchase of the Property located at 22 Hillock Woods, The Woodlands, Texas.

50. On or about July 23, 2004, LESLIE R. TARRANCE, SR. caused a check to be written on the account of Ultra Classic Custom Homes, Inc. payable to MICHAEL GOODSON in the amount of \$50,000.

18 Hillock Woods, The Woodlands, Texas

51. On or about June 7, 2003, NANCY BOOTH caused the Borrower's gross monthly base employment income amount stated on the Uniform Residential Loan Application to be increased from \$6,250.00 to \$19,000.00 in applying for loans totaling \$577,500 for the purchase of the Property located at 18 Hillock Woods, The Woodlands, Texas.

52. On or about July 22, 2004, LESLIE R. TARRANCE, SR. signed a letter on Ultra Classic Custom Homes, Inc. letterhead indicating he did not require the Borrower for the purchase of the Property located at 18 Hillock Woods, The Woodlands, Texas to provide Earnest Money after reviewing the Borrower's credit and personal information and stated he felt confident the Borrower would not change his mind about purchasing the

house.

53. On or about July 30, 2004, LESLIE R. TARRANCE, SR. caused a check to be written on the bank account of Ultra Classic Custom Homes, Inc. payable to M.G.N. Management in the amount of \$50,000.

54. The Grand Jury realleges and incorporates by reference, as though fully set forth herein, Counts Two through Ten and Twelve through Fourteen.

All in violation of Title 18, United States Code, Section 371.

MAIL FRAUD COUNTS

COUNTS TWO THROUGH FIVE

1. The Grand Jury realleges and incorporates by reference, as though set forth in full herein, the allegations set forth in Sections A and Section C of Count One of this Indictment.

2. On or about the following dates, in the Southern District of Texas and elsewhere, the defendants,

MICHAEL D. GOODSON
NANCY BOOTH aka Nancy Campbell

and others, known and unknown to the Grand Jury, knowingly devised and intended to devise a scheme and artifice to defraud and to obtain money and

property by means of false and fraudulent pretenses, representations and promises, and for the purpose of executing the scheme and artifice to defraud, and attempting to do so, knowingly caused to be placed in an authorized depository for mail matter to be sent and delivered by the United States Postal Service, by any private or commercial interstate carrier, such as United Parcel Service, and caused to be deposited and sent or delivered according to the directions thereon, or at the place at which it is directed to be delivered by the person to whom it is addressed, the following mail matter:

COUNT	DATE	MAIL MATTER
Two	June 13, 2003	Closing documents sent via United Parcel Service by Aggieland Title to Aames Home Loan after the closing, on June 13, 2003, of the loans to purchase the Property located at 306 Stoney Hills Court, College Station, Texas.
Three	August 29, 2003	Closing documents sent via United Parcel Service by Stewart Title to Aames Home Loan after the closing, on August 28, 2003, of the loan to purchase the Property located at 63 Fairway Park, Montgomery, Texas.
Four	September 19, 2003	Loan application documents sent via Lone Star Overnight by Nancy Booth to Long Beach Mortgage regarding the loans to purchase 3606 Vashon Lane, Spring, Texas.

Five October 31, 2003 Loan application documents sent via Lone Star Overnight by Nancy Booth to Long Beach Mortgage regarding the loans to purchase 9627 Stonebridge Place, Tomball, Texas.

In violation of Title 18, United States Code, Section 1341 and 2.

COUNTS SIX & SEVEN

1. The Grand Jury realleges and incorporates by reference, as though set forth in full herein, the allegations set forth in Sections A and Section C of Count One of this Indictment.

2. On or about the following dates, in the Southern District of Texas and elsewhere, the defendants,

MICHAEL D. GOODSON aka Mike Goodson
NANCY BOOTH aka Nancy Campbell
LESLIE R. TARRANCE, SR. aka Les Tarrance

and others, known and unknown to the Grand Jury, knowingly devised and intended to devise a scheme and artifice to defraud and to obtain money and property by means of false and fraudulent pretenses, representations and promises, and for the purpose of executing the scheme and artifice to defraud, and attempting to do so, knowingly caused to be placed in an authorized depository for mail matter to be sent and delivered by the United States Postal Service, by any private or commercial interstate carrier, such as

United Parcel Service, and caused to be deposited and sent or delivered according to the directions thereon, or at the place at which it is directed to be delivered by the person to whom it is addressed the following mail matter:

COUNT	DATE	MAIL MATTER
Six	June 27, 2003	Sent via United States Postal Service Check number 5408 written on the bank account of Ultra Classic Custom Homes, Inc. payable to the Borrower of the Property located at 31 Fairway Park, Montgomery, Texas in the amount of \$2140.02.
Seven	June 27 , 2003	Closing documents sent via United Parcel Service by Stewart Title to Aames Home Loan after the closing, on June 26, 2003, of the loans to purchase the Property located at 31 Fairway Park, Montgomery, Texas.

In violation of Title 18, United States Code, Section 1341 and 2

WIRE FRAUD COUNTS

COUNTS EIGHT THROUGH TEN

A. The Grand Jury realleges and incorporates by reference, as though fully set forth herein, the allegations contained in sections A and C as set out in Count One of the indictment.

B. Beginning in or about September 2000 and continuing through

March 30, 2006, in the Southern District of Texas, the defendants,

MICHAEL D. GOODSON aka Mike Goodson
NANCY BOOTH aka Nancy Campbell

aided and abetted by others known and unknown to the grand jury, did knowingly devise, intend to devise, and participate in a scheme to defraud and to obtain money and property by means of materially false and fraudulent pretenses, representations and promises, and material omissions, which scheme is set forth in Section C of Count One of the indictment.

C. In each of counts seven through nine and on the dates alleged below, in the Southern District of Texas, the defendants, aided and abetted by one another and others known and unknown to the grand jury, for the purpose of executing, and attempting to execute, the scheme and artifice to defraud, and to obtain money by means of false and fraudulent pretenses and representations did cause to be transmitted in interstate commerce, by means of a wire communication loan funds from the bank account of the Lender into the bank account of the Title Company.

COUNT	DATE	TRANSMISSION DESCRIPTION
Eight	February 24, 2004	\$431,495.84 wire transfer from Washington Mutual Bank in Stockton, California to SouthTrust Bank in Houston, Texas to fund a loan to purchase 8103 Hideaway Lake Circle, Spring, Texas
Nine	February 27, 2004	\$466,786.70 wire transfer from Washington Mutual Bank in Stockton, California to SouthTrust Bank in Houston, Texas to fund a loan to purchase 19827 Westside Forest Dr., Houston, Texas
Ten	April 22, 2004	\$218,669.82 wire transfer from HSBC Bank, Newark, Delaware to SouthTrust Bank in Houston, Texas to fund a loan to purchase 5101 Sycamore Hills Dr., College Station, Texas

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

MONEY LAUNDERING COUNTS

COUNT ELEVEN

A. The Grand Jury realleges and incorporates by reference, as though fully set forth herein, the allegations contained in sections A and C as set out in Count One of the indictment.

B. From in or about September 2000 to on or about March 30,

2006, in the Southern District of Texas, and elsewhere, and within the jurisdiction of this Court

MICHAEL D. GOODSON, aka Mike Goodson
NANCY BOOTH, aka Nancy Campbell
LESLIE R. TARRANCE, SR., aka Les Tarrance

defendants herein, did unlawfully, knowingly and intentionally combine, conspire, confederate and agree with each other and others known and unknown to the grand jury, to commit the following offenses against the United States in violation of Title 18, United States Code, Section 1956, to wit:

1. To knowingly and willfully conduct and attempt to conduct a financial transaction affecting interstate commerce which involved the proceeds of a specified unlawful activity, with the intent to promote the carrying on of specified unlawful activity, that is, wire fraud, a violation of Title 18, United States Code, 1343 and mail fraud, Title 18, United States Code, Section 1341, and that while conducting and attempting to conduct such financial transaction knew that the property involved in the financial transaction, that is funds and monetary instruments represented the proceeds of some form of unlawful activity, in violation of Title 18, United States Code, Section 1956 (a)(1)(A)(i).

2. To knowingly and willfully conduct and attempt to conduct a

financial transaction, the activities of which affect interstate commerce with the proceeds of a specified unlawful activity, that is, wire fraud, a violation of Title 18, United States Code, Section 1343 and mail fraud, a violation of Title 18, United States Code, Section 1341, knowing that the transaction was designed in whole and in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of said specified unlawful activity and that while conducting and attempting to conduct such financial transaction knew that the property involved in the financial transaction, that is funds and monetary instruments represented the proceeds of some form of unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

All in violation of Title 18, United States Code, Section 1956(h).

COUNTS TWELVE & THIRTEEN

1. The Grand Jury realleges and incorporates by reference, as though set forth in full herein, the allegations set forth in Sections A and Section C of Count One of this Indictment.

2. On or about the following dates, in the Southern District of Texas and elsewhere, the defendants,

MICHAEL D. GOODSON
NANCY BOOTH aka Nancy Campbell
LESLIE R. TARRANCE, SR. aka Les Tarrance

defendants herein, aided and abetted by each other and by other persons known and unknown to the grand jury, did knowingly and intentionally conduct and attempt to conduct a financial transaction affecting interstate commerce, to wit, a transfer of United States currency which involved the proceeds of a specified unlawful activity, namely violations of Title 18, United States Code, Sections 1341 and 1343, with intent to promote the carrying on of said specified unlawful activity, and that while conducting and attempting to conduct such financial transaction knew that the property involved in the financial transaction represented the proceeds of some form of unlawful activity.

COUNT	DATE	FINANCIAL TRANSACTION
Twelve	August 29, 2003	Deposit of \$78,357.58 into the Washington Mutual bank account of Boston Interiors & Design
Thirteen	December 17, 2003	Deposit of \$86,005.83 into the Washington Mutual bank account of Boston Interiors & Design

In violation of Title 18, United States Code, Sections 1956(a)(1)(A)(I) and 2.

COUNT FOURTEEN

1. The Grand Jury realleges and incorporates by reference, as though set

forth in full herein, the allegations set forth in Sections A and Section C of Count One of this Indictment.

2. On or about November 24, 2003, in the Southern District of Texas and elsewhere, the defendants,

MICHAEL D. GOODSON
NANCY BOOTH aka Nancy Campbell

defendants herein, aided and abetted by each other and by other persons known and unknown to the grand jury, did knowingly and intentionally conduct and attempt to conduct a financial transaction affecting interstate commerce, to wit, a transfer of United States currency, namely \$118,527.81 deposited into the Washington Mutual bank account of Boston Interiors & Design, which involved the proceeds of a specified unlawful activity, namely violations of Title 18, United States Code, Sections 1341 and 1343, with intent to promote the carrying on of said specified unlawful activity, and that while conducting and attempting to conduct such financial transaction knew that the property involved in the financial transaction represented the proceeds of some form of unlawful activity.

In violation of Title 18, United States Code, Sections 1956(a)(1)(A)(I) and 2.

NOTICE OF FORFEITURE

(18 U.S.C. § 981(a)(1)©

(18 U.S.C. § 982(a)(1))

Pursuant to Title 28, United States Code, Section 2461©, and Title 18, United States Code, Section 981(a)(1)© the United States gives notice that the defendants

**MICHAEL D. GOODSON,
NANCY BOOTH aka Nancy Campbell, and
LESLIE R. TARRANCE, SR. aka Les Tarrance**

shall forfeit to the United States all property which constitutes or is derived from proceeds traceable to a violation of Title 18, United States Code, Sections 1341 and 1343, including a conspiracy to commit such offenses, as charged in Counts One through Nine of the Indictment; and

Pursuant to Title 18, United States Code, Section 982, the United States gives notice that the defendants

**MICHAEL D. GOODSON,
NANCY BOOTH aka Nancy Campbell, and
LESLIE R. TARRANCE, SR. aka Les Tarrance**

shall forfeit to the United States all property, real and personal, involved in a violation of Title 18, United States Code, Section 1956, including a conspiracy to commit such offenses, as charged in Counts Ten through Thirteen of the Indictment.

The property subject to forfeiture under Title 18, United States Code, Section 981(a)(1)(C) and Title 18, United States Code, Section 982(a)(1),

includes, but is not limited to, the following property:

- Count 1 about \$12,251,450.00 in United States Dollars;
- Count 2 about \$224,000 in United States dollars;
- Count 3 about \$571,500 in United States dollars;
- Count 4 about \$420,000 in United States dollars;
- Count 5 about \$765,000 in United States dollars;
- Count 6 about \$496,000 in United States dollars;
- Count 7 about \$496,000 in United States dollars;
- Count 8 about \$431,495.84 in United States dollars;
- Count 9 about \$466,786.70 in United States dollars;
- Count 10 about \$218,669.82 in United States dollars;
- Count 11 about \$12,251,450.00 in United States Dollars;
- Count 12 about \$78,357.58 in United States dollars;
- Count 13 about \$86,005.83 in United States dollars; and
- Count 14 about \$118,527.81 in United States dollars.

SUBSTITUTE ASSETS

In the event that the property subject to forfeiture as a result of any act or omission of the defendant:

- a. cannot be located upon exercise of due diligence;

- b. has been placed beyond the jurisdiction of the Court;
- c. has been transferred or sold to, or deposited with a third party;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States to seek forfeiture of any other property of the defendant up to the value of such property pursuant to Title 21, United States Code, Section 853(p), incorporated by reference in Title 28, United States Code, Section 2461 and Title 18, United States Code, Section 982(b)(1).

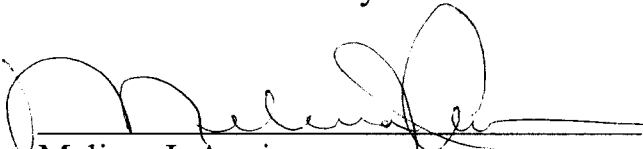
A TRUE BILL

ORIGINAL SIGNATURE
ON FILE WITH THE CLERK

FOREPERSON OF THE GRAND JURY

DONALD J. DeGABRIELLE, JR.
United States Attorney

By:



Melissa J. Annis
Assistant United States Attorney