

United States District Court
District of Connecticut
FILED AT BRIDGEPORT
2/12/2014 20
Robert J. Jaccia, Clerk
By: [Signature]

UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT

UNITED STATES OF AMERICA : CASE NO. 3:14CR 24 (JCH)
: :
: :
: :
v. : 18 U.S.C. § 1349 (Conspiracy)
: :
CHRISTOPHER M. BRECCIANO :

INFORMATION

The United States Attorney charges:

COUNT ONE
(Conspiracy – 18 U.S.C. § 1349)

The Conspiracy

CMB
AMN
June 9/2

1. From approximately 2006 to June 2010, in the District of Connecticut and elsewhere, the defendant CHRISTOPHER M. BRECCIANO did unlawfully, knowingly, and intentionally combine, conspire, confederate, and agree with others, both known and unknown to the United States Attorney, to commit an offense against the United States as follows:

- a. to devise and intend to devise a scheme and artifice to defraud and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, and for the purpose of executing and attempting to execute the scheme and artifice, did knowingly transmit and cause to be transmitted, by means of wire communications in interstate and foreign commerce, writings, signs, signals, pictures, and sounds, in violation of Title 18, United States Code, Section 1343; and
- b. to devise and intend to devise a scheme and artifice to defraud a financial institution, and for the purpose of obtaining money and property owned by, or under the custody and control of, a financial institution, did knowingly execute and attempt to execute a scheme and artifice to defraud by means of material false and fraudulent pretenses, representations, and promises, in violation of Title 18, United

States Code, Section 1344.

Purpose of the Conspiracy

2. A purpose and object of the conspiracy was for the co-conspirators to enrich themselves by obtaining millions of dollars in real estate mortgages through the use of materially false loan applications, real estate mortgage loan documents, and HUD-1 forms, and to conceal the conspiracy from others.

Manner and Means of the Conspiracy

The manner and means by which BRECCIANO and his co-conspirators sought to accomplish and did accomplish the objects of the conspiracy included the following:

3. It was part of the conspiracy that BRECCIANO'S co-conspirators sought to purchase dozens of single and multi-family properties in Bridgeport, Norwalk and Stamford, Connecticut.

4. It was further part of the conspiracy that BRECCIANO'S co-conspirators would and did apply for mortgages from mortgage lenders and from financial institutions the deposits of which are insured by the Federal Deposit Insurance Corporation, (together, "Lenders") to purchase such properties.

5. It was further part of the conspiracy that BRECCIANO, an attorney licensed to practice law in Connecticut, served as the closing attorney for more than fifty (50) real estate transactions.

6. It was further part of the conspiracy that BRECCIANO and his co-conspirators made, or caused to be made, materially false statements in the borrowers' loan applications, HUD-1 forms, and other documentation submitted to the Lenders in order to obtain financing.

7. It was further part of the conspiracy that, in multiple transactions, the HUD-1 form BRECCIANO and his co-conspirators submitted to the Lenders indicated that the borrowers paid funds at closing when, as he and his co-conspirators well knew, the borrowers paid no such funds at closing.

8. It was further part of the conspiracy that, in multiple transactions, the HUD-1 forms BRECCIANO and his co-conspirators submitted to the Lenders intentionally disguised the actual disbursements of the Lenders' funds and disguised the absence of any funds being paid by the borrowers in the transactions.

9. It was further part of the conspiracy that, in multiple transactions, many of the borrowers were in fact "straw" buyers, acting on behalf of the true buyer, who maintained complete control over the property and received all rental income.

10. It was further part of the conspiracy that BRECCIANO and his co-conspirators would and did cause wire transmissions to be sent from accounts held by Lenders outside the District of Connecticut to accounts held within the District of Connecticut as part of mortgage loan transactions.

11. It was further part of the conspiracy that BRECCIANO and his co-conspirators would and did distribute the proceeds of mortgage loans obtained as part of the scheme other than as represented on numerous Form HUD-1s submitted by or at the direction of BRECCIANO to mortgage lenders.

OVERT ACTS

12. In furtherance of the conspiracy and to effect the illegal objects of the conspiracy, the defendant BRECCIANO and his co-conspirators committed the following overt acts, among

All in violation of Title 18, United States Code, Section 1349.

UNITED STATES OF AMERICA



MICHAEL J. GUSTAFSON
ACTING UNITED STATES ATTORNEY



ANN M. NEVINS
ASSISTANT UNITED STATES ATTORNEY



JOHN W. McREYNOLDS
SPECIAL ASSISTANT U.S. ATTORNEY