

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

MAY 18 2010

UNITED STATES OF AMERICA)	INFORMATION
v.)	Case No. <u>10-cv-99-bbc</u>
JASON KHODADAD,)	18 U.S.C. § 371
Defendant.)	

COUNT ONE

THE UNITED STATES ATTORNEY CHARGES:

1. From on or about March 14, 2006, to on or about April 17, 2006, in the Western District of Wisconsin, and elsewhere, the defendant,

JASON KHODADAD,

knowingly conspired with Brian Bowling, and other persons known and unknown, to knowingly make false statements for the purpose of influencing the action of World Savings Bank, an institution the deposits of which were then insured by the Federal Deposit Insurance Corporation, in connection with a residential loan application, Form 1003, in violation of Title 18, United States Code, Section 1014.

Manner and Means

2. The manner and means by which the conspiracy was sought to be accomplished included, among other things, the following:

a. It was part of the conspiracy that the defendant submitted and caused to be submitted a loan application to World Savings Bank in order to obtain a home loan in the amount of \$139,200 to purchase 4705 Texas Trail, Madison, WI.

b. It was further part of the conspiracy that the defendant's loan application contained numerous false statements, including: (1) inflated gross monthly income; (2) misrepresented source of downpayment; (3) inflated bank account balance; and (4) misrepresented subordinate financing.

Overt Acts

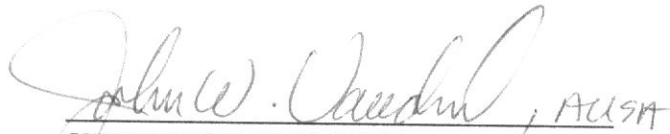
3. In furtherance of the conspiracy and to accomplish its objectives, the following overt acts were committed in the Western District of Wisconsin, and elsewhere:

a. On or about April 17, 2006, KHODADAD signed a Uniform Residential Loan Application, Form 1003, in support of a \$139,200 home mortgage from World Savings Bank, certifying that the information contained on the Form 1003 was true and correct, when in fact, KHODADAD falsely inflated his gross monthly income, misrepresented the source of the down payment, inflated his bank account balance and misrepresented his subordinate financing.

b. On or about April 17, 2006, KHODADAD signed a Settlement Statement, Form HUD-1, at the closing on the World Savings Bank loan, certifying that the information contained on the HUD-1 was true and correct, when in fact, KHODADAD knew the HUD-1 misrepresented the source of his cash down payment and failed to include a silent second mortgage from National City Mortgage.

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

5/18/10
Date

for  *ACUSA*
STEPHEN P. SINNOTT
United States Attorney