

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

Case No. 07-60207-CR-ZLOCH

UNITED STATES OF AMERICA,

Plaintiff,

v.

FELIPE M. NUNEZ,

Defendant.

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FACTUAL STIPULATION IN SUPPORT OF PLEA AGREEMENT

The United States of America and (hereinafter referred to as the "defendant") enter into the following factual stipulation in support of the plea agreement and state as follows:

If this case were to proceed to trial, the government would prove beyond a reasonable doubt by witness testimony and physical evidence that defendant Felipe M. NUNEZ, was recruited to be a straw buyer of properties selected by codefendant Henry QUINTERO. Co-defendants HENRY QUINTERO and Lazaro VILLALBA who organized and participated in the eight charged fraudulent mortgage transactions listed as properties A through H in the indictment. They would locate large, expensive homes for sale in the Southwest Ranches area of Broward County and offer between \$62,000 - \$100,000 in excess of the asking price in order to provide for the alleged construction of certain improvements and/or a finders fee or commission to their companies New World International / D & H Investments of South Florida. With this "instant equity" available, they recruited straw buyers and obtained or created numerous false documents including fraudulent employment verifications, bank account deposits and rental

payment history in order to ensure the loan approvals which provided for their receipt of cash back at the closings. Between September, 2003, and October 22, 2004, the conspirators participated in at least twelve straw buyer fraudulent mortgages in Broward County.

NUNEZ purchased two properties at the direction of QUINTERO and VILLALBA. The first property listed as property G in the indictment is located at: 5109 SW 164th Terrace Southwest Ranches, Florida for \$725,000 and 20251 SW 50th Place Southwest Ranches, Florida for \$600,000. On both applications, submitted to different lenders at approximately the same time, NUNEZ, an unemployed furniture salesman, claimed to be working at Maddux and Company as a market manager earning \$12,954.25 per month. NUNEZ attended both closings, signed all required documents and never occupied or intended to occupy the houses. NUNEZ was paid \$10,000 by QUINTERO for each transaction (20,000 total) as charged in count 63 and 69 of the ~~proposed~~ indictment. NUNEZ obtained the two mortgages through Home Mortgage Finance Group through mortgage Broker Antonio RAMOS who knew NUNEZ was a straw buyer and RAMOS was also involved in the scheme..

The second fraudulent mortgage obtained by NUNEZ was for the purchase of the property located at 20251 SW 50th Place South West Ranches was purchased by NUNEZ October 21, 2004 for \$600,000. NUNEZ obtained the two mortgages for the property, a first and a second through Home Mortgage Finance Group mortgage Broker Antonio RAMOS. RAMOS placed loan with New Century Mortgage, Corp. located in Orange, California. NUNEZ was questioned during the investigation and admitted that he knew the information on both loan applications was false.

In September 2004 The uniform Residential loan applications Form 1003 as well as false IRS form W2s for Felipe Nunez were submitted via facsimile from Home Mortgage Financial group


in Miami ,Florida to the lender Master financial in Orange, California.

In October 2004, Master Financial in Orange County California wire transferred \$634,108.68 and another wire transfer of 99,986.11 to Barrister Title Services of Weston, in Weston, Florida to fund the purchase of the property as detailed in counts 18, 19, 20 and 21 of the indictment this is a violation of the wire fraud statute, Title 18, United States Code, Section 1343.

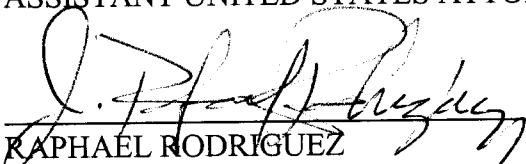
The proceeds of the specified unlawful activity of wire fraud were then used to promote the specified unlawful activity by laundering the proceeds as detailed in counts 63 and 69 of the indictment in violation of Title 18, United States Code, Section 1956 (a)(1)(A)(i).

Defendant Nunez received a total of \$20,000 in laundered proceeds from the fraudulent mortgages obtained on the two properties in the Southern District of Florida. We have read and agree with all of the facts in this stipulation and they set forth all of the elements for the offense of money laundering in violation of Title 18, United States Code, Section 1956 (a)(1)(A)(I) as charged in count 63 of the indictment.


Date: 12/14/07


THOMAS P. LANIGAN
ASSISTANT UNITED STATES ATTORNEY

Date: 12/14/07


RAPHAEL RODRIGUEZ
ATTORNEY FOR DEFENDANT NUNEZ

Date: 12-14-07


FELIPE M. NUNEZ
DEFENDANT