

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA)

v.)

1. EDWARD ARNOLD SEPTON)
2. CHRISTOPHER ERIK SEPTON)
3. CHRISTOPHER ADAM HORTON)
4. SEAN BRIAN LEAF)
5. JODDILEE MARGARET LINDBERG)
6. MICAH DANIEL THORMODSGAARD)

CR 07-272 JNE
INFORMATION

18 U.S.C. § 371
18 U.S.C. § 1344
18 U.S.C. § 2

The United States Attorney charges:

Count 1
(Conspiracy)
18 U.S.C. § 371

1. From in or about 2000 and continuing through in or about August 2004, in the State and District of Minnesota and elsewhere, the defendants,

EDWARD ARNOLD SEPTON,
CHRISTOPHER ERIK SEPTON,
CHRISTOPHER ADAM HORTON,
SEAN BRIAN LEAF,
JODDILEE MARGARET LINDBERG, and
MICAH DANIEL THORMODSGAARD,

and other persons known and unknown to the United States, did knowingly and willfully combine, conspire, and agree to commit offenses against the United States, that is,

a. to knowingly execute a scheme and artifice to defraud federally insured financial institutions, and to obtain money and property of federally insured financial institutions through material false and fraudulent pretenses, representations and promises, in violation of 18 U.S.C. § 1344; and

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b. to knowingly cause items to be sent, delivered, and moved by the United States Postal Service and interstate commercial carriers, according to the directions thereon, for the purpose of executing a scheme and artifice to defraud and to obtain money and property of mortgage lenders and banks through material false statements and representations, in violation of 18 U.S.C. § 1341.

2. In furtherance of the conspiracy, in or about January 2004, members of the conspiracy submitted false and fraudulent loan applications for a borrower purchasing a property in Wayzata, Minnesota, to obtain a \$1,330,000 loan from Washington Mutual Bank and a \$378,555 second mortgage from Associated Bank, both of which are federally insured financial institutions. These loan applications: (1) falsely stated the source of a \$107,206.90 down payment which had been loaned to the borrower by the conspirators; (2) inflated the borrower's income and assets; (3) contained falsified tax returns that misstated income; and (4) falsely stated the borrower's liabilities.

3. All in violation of 18 U.S.C. § 371.

Count 2
(Bank Fraud)
18 U.S.C. § 1344

4. In or about September 2001, in the State and District of Minnesota, the defendant,

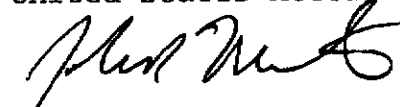
EDWARD ARNOLD SEPTON,

aided and abetted by other persons known and unknown to the United States, did knowingly execute a scheme and artifice to defraud a federally insured financial institution, that is, Bremer Bank in connection with a \$59,800 second mortgage loan application, by submitting material false documents that falsely inflated the applicant's income, falsely stated the applicant's job, and contained a forged notary signature.

5. all in violation of 18 U.S.C. §§ 1344 and 2.

Dated:

RACHEL K. PAULOSE
United States Attorney

A handwritten signature in cursive script, appearing to read "John R. Marti", written in black ink.

BY: JOHN R. MARTI
Assistant U.S. Attorney