

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

UNITED STATES OF AMERICA)
)
 v.) Criminal No. 08-56
)
 RAYMOND FIELDS) (18 U.S.C. § 1349)

INFORMATION

COUNT ONE

The United States Attorney charges:

THE CONSPIRACY AND ITS OBJECTS

1. From in or around December 2005, and continuing thereafter until in or around July 2007, in the Western District of Pennsylvania and elsewhere, the defendant, RAYMOND FIELDS, knowingly and willfully did conspire, combine, confederate and agree with other persons known to the United States Attorney, to commit an offense against the United States, that is, Wire Fraud, in violation of Title 18, United States Code, Section 1343.

MANNER AND MEANS OF THE CONSPIRACY

2. It was a part of the conspiracy that the defendant, RAYMOND FIELDS, with the assistance of other members of the conspiracy, applied for loans to purchase properties in the Pittsburgh, Pennsylvania and the McKeesport, Pennsylvania areas, including the properties located at 6 Renwick Street, Pittsburgh, Pennsylvania, 818 Soles Avenue, McKeesport, Pennsylvania, and 2932 Jersey Avenue, McKeesport, Pennsylvania.

3. It was further a part of the conspiracy that the

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defendant, RAYMOND FIELDS, with the assistance of other members of the conspiracy, made material misrepresentations in connection with the loan applications about his financial condition.

4. It was further a part of the conspiracy that the defendant, RAYMOND FIELDS, and other members of the conspiracy submitted false documents in connection with the loan applications, including but not limited to, verifications of employment, verifications of deposit, appraisals, paystubs, and W-2s.

5. It was further a part of the conspiracy that the defendant, RAYMOND FIELDS, caused wire transfers from the accounts of the lending institutions, located outside the Commonwealth of Pennsylvania, to the accounts of the closing agents located in the Commonwealth of Pennsylvania, in furtherance of the Wire Fraud scheme.

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

FORFEITURE ALLEGATIONS

6. The United States Attorney realleges and incorporates by reference the allegations contained in paragraphs one through five of this Information for the purpose of alleging criminal forfeitures pursuant to 28 U.S.C. Section 2461(c), which incorporates Title 18, United States Code, Section 981(a)(1)(C) and Title 21, United States Code, Section 853(p).

7. As a result of the commission of the violation charged in paragraphs one through five of this Information, the defendant, RAYMOND FIELDS, did acquire the following property that constitutes, and is derived from, the proceeds obtained, directly and indirectly, from such violation, thereby subjecting said property to forfeiture to the United States of America pursuant to 28 U.S.C. Section 2461(c), which incorporates Title 18, United States Code, Section 981(a)(1)(C):

(a) United States currency, cash equivalents, and bank account balances, constituting the gross proceeds of such violations; and


(b) White, 2001 GMC Yukon Denali, VIN #1GKEK63UX1J194781.

8. If through any act or omission by the defendants, RAYMOND FIELDS, any or all of the property described in paragraph 7 above (hereinafter the "Subject Properties")

- a. Cannot be located upon the exercise of due diligence;
- b. Has been transferred, sold to, or deposited with a third person;

- c. Has been placed beyond the jurisdiction of the Court;
- d. Has been substantially diminished in value; or
- e. Has been commingled with other property which cannot be subdivided without difficulty,

the United States intends to seek forfeiture of any other property of the defendant up to the value of the Subject Properties forfeitable above pursuant to 28 U.S.C. Section 2461(c), which incorporates Title 21, United States Code, Section 853(p).


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