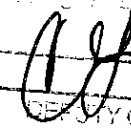


UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA :
 :
 :
 VS. :
 :
 ALEX GAMBINI, :
 Defendant :
 :
 :

NO. 3:CR-08- 369

FILED
SCRANTON
OCT 07 2008
PER 
DEPUTY CLERK

INDICTMENT

Introduction

At all times relevant to this Indictment,

1. Alex Gambini operated a mortgage business called First Advantage Financial in the Middle District of Pennsylvania.
2. Beginning in or about 1999 and continuing until in or about 2002, Gambini and others prepared and processed mortgage applications for clients.
3. From in or about 1999-2002, First Advantage Financial was operated as a business from offices in Lake Ariel, Pennsylvania, Hamlin, Pennsylvania, and Old Forge, Pennsylvania. During this time period, First Advantage Financial compiled and completed mortgage applications for clients and used the U.S. Mails and private and commercial carriers to send completed mortgage applications to banks and other financial institutions.

Scheme and Artifice to Defraud

Between in or about January of 1999 and continuing to in or about December of 2002, in the Middle District of Pennsylvania and elsewhere, the Defendant,

ALEX GAMBINI,

devised and intended to devise a scheme and artifice to defraud and obtain money and/or property from various mortgage companies and banks. It was part of the scheme that:

1. The Defendant operated a financial services business, employing real estate appraisers and loan processors who appraised properties and assisted clients with the mortgage application process by compiling the necessary documents, obtaining the necessary appraisals of the properties to be purchased or mortgages to be refinanced, and assisted with completing the mortgage application.

2. The Defendant on numerous occasions during this time period knowingly instructed others to conduct false and fraudulent appraisals of properties, produce false and fraudulent documents, supplied those false and fraudulent appraisals, and supplied software to accomplish false and fraudulent appraisals to be used and submitted to banks and mortgage companies in order to qualify customers for higher mortgages.

3. The Defendant caused to be deposited in the United States Mail and by private and commercial carrier, false and fraudulent documents, photographs, appraisals, and mortgage applications, used as part of the mortgage application process.

COUNT 1

THE GRAND JURY CHARGES:

The Grand Jury incorporates by reference, as though fully set forth herein, the Introduction and Scheme and Artifice to Defraud sections of this Indictment.

Between in or about January 1999 and continuing to in or about December 2002, in the Middle District of Pennsylvania, the Defendant,

ALEX GAMBINI,

aiding and abetting other persons, and aided and abetted by other persons, for the purpose of executing and attempting to execute the above described scheme or artifice to defraud, did obtain moneys, funds, and/or other property owned by and under the custody and control of various mortgage companies and banks, including financial institutions, by means of false and fraudulent pretenses, representations and promises, as set forth in the Scheme and Artifice to Defraud Section of this Indictment, and did cause to be deposited in, and taken and received from, the mails, false and fraudulent property appraisals, false and fraudulent documents and photographs of property, and false and fraudulent mortgage applications, to fraudulently obtain mortgages for numerous people, and the use of the United States Mail being a separate count of this Indictment incorporating the above "Introduction" and "Scheme and Artifice to Defraud" sections, as if set forth in full.


In violation of Title 18, United States Code, Section 1341 and 2.

A TRUE BILL

DATE:

10/7/08




MARTIN C. CARLSON
United States Attorney