

Unsealed 4/8/10

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

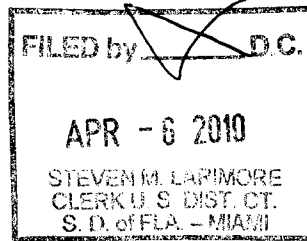
CASE NO. 09-21028-CR-LENARD/TURNOFF(s)

18 U.S.C. § 1349
18 U.S.C. § 1344
18 U.S.C. § 215
18 U.S.C. § 2
18 U.S.C. § 982

UNITED STATES OF AMERICA

vs.

GRETA MEDINA,
RICARDO ESTRADA,
MARTIN MERE,
FERNANDA S. ABREU,
DANIA ARGUELLES,
CHRISTIAN GOMEZ,
OBED HERNANDEZ,
YOHAMEL CABALLERO,
ALFONSO VELASCO,
NESTOR COLLANTES,
ANA AVILES,
LEISMY BARCIA, and
ADAN VASQUEZ,



Defendants.

SUPERSEDING INDICTMENT

The Grand Jury charges that:

GENERAL ALLEGATIONS

At various times relevant to this Superseding Indictment:

1. The term "home equity line of credit" ("HELOC") refers to a loan in which the lender agrees to lend to the borrower a maximum amount of money within an agreed period, and the equity in the borrower's property serves as collateral for the loan. The borrower is not advanced the entire

DE# 182

sum of money up front, but uses a line of credit to borrow sums that total no more than the total amount of money authorized under the HELOC.

2. The term “closing” refers to the legal event at which the transfer of an interest in real estate from seller to buyer formally took place, as well as the point at which funds were transferred between the various parties, such as from the lending institution to the buyer or to the seller on the buyer’s behalf, which transfer was often accomplished by temporarily passing the funds through an intermediary referred to as a “settlement agent” or “title company.”

3. A HUD-1 Settlement Statement (“HUD-1 Statement”) is a standard form required to be executed for the closing of all real estate transactions. The HUD-1 Statement itemizes all aspects of the closing for the lender including any payments made by the borrower, money due to the seller, and any fees paid to third parties in connection with the closing.

4. “Cash-to-close” refers to the monetary obligations to be met by an individual, usually the buyer, in order for a closing on a particular real estate transaction to be completed.

5. Wells Fargo Bank, N.A. (“Wells Fargo Bank”) was a financial institution with offices located throughout the United States, including the State of Florida, and whose accounts were insured by the Federal Deposit Insurance Corporation (“FDIC”).

6. Futuristic Title Services, Inc. (“Futuristic Title”) was a Florida company doing business as a title company, with its principal place of business located at 9485 SW 72nd Street, Suite A-225, in Miami, Florida.

7. Defendant **GRETA MEDINA** was an individual who resided in Miami-Dade County, Florida.

8. Defendant **RICARDO ESTRADA** was an individual who resided in Miami-Dade

County, Florida. **ESTRADA** served as a loan officer who processed residential loan transactions at Wells Fargo Bank, including loan transactions on behalf of **GRETA MEDINA**.

9. Defendant **MARTIN MERE** was an individual who resided in Miami-Dade County, Florida. **MERE** recruited a straw buyer to purchase residential property located at 217 San Sebastian Avenue, Coral Gables, Florida on behalf of **GRETA MEDINA**.

10. Defendant **FERNANDA S. ABREU** was an individual who resided in Miami-Dade County, Florida. **ABREU** recruited a straw buyer to purchase residential property located at 1331 Brickell Bay Drive, Unit 4503, Miami, Florida (the “Jade property – Unit 4503”) on behalf of **GRETA MEDINA**.

11. Defendant **DANIA ARGUELLES** was an individual who resided in Miami-Dade County, Florida. **ARGUELLES** recruited a straw buyer to purchase residential property located at 821 Ferdinand Street, Coral Gables, Florida (the “Ferdinand Street property”) on behalf of **GRETA MEDINA**.

12. Defendant **CHRISTIAN GOMEZ** was an individual who resided in Miami-Dade County, Florida.

13. Defendant **OBED HERNANDEZ** was an individual who resided in Miami-Dade County, Florida. **HERNANDEZ** recruited a straw buyer to purchase residential property located at 1331 Brickell Bay Drive, Unit 4303, Miami, Florida (the “Jade property – Unit 4303”) on behalf of **GRETA MEDINA**.

14. Defendant **YOHAMEL CABALLERO** acted as a straw buyer who in exchange for a fee allowed his identity and credit to be used in the purchase of the Ferdinand Street property.

15. Defendant **ALFONSO VELASCO** acted as a straw buyer who in exchange for a fee

allowed his identity and credit to be used in the purchase of 1331 Brickell Bay Drive, Unit 2605, Miami, Florida (the “Jade property – Unit 2605”).

16. Defendant **NESTOR COLLANTES** acted as a straw buyer who in exchange for a fee allowed his identity and credit to be used in the purchase the Jade property – Unit 4303.

17. Defendant **ANA V. AVILES** acted as a straw buyer who in exchange for a fee allowed her identity and credit to be used in the purchase of 1331 Brickell Bay Drive, Unit 4109, Miami, Florida (the “Jade property – Unit 4109”).

18. Defendant **LEISMY BARCIA** acted as a straw buyer who in exchange for a fee allowed his identity and credit to be used in the purchase of the Jade property – Unit 4503.

19. Defendant **ADAN VASQUEZ** acted as a straw buyer who in exchange for a fee allowed his identity and credit to be used in the purchase of 1331 Brickell Bay Drive, Unit 3203, Miami, Florida (the “Jade property – Unit 3203”).

20. B.D. acted as a straw buyer who in exchange for a fee allowed her identity and credit to be used in the purchase of residential property including 800 Benevento Avenue (the “Benevento Avenue property”) and 1525 Miller Road in Coral Gables, Florida (the “Miller Road property”).

21. Alberto Lopera acted as a straw buyer who in exchange for a fee allowed his identity and credit to be used in the purchase of 1331 Brickell Bay Drive, Unit 3503, Miami, Florida (the “Jade property – Unit 3503”).

22. Melissa Ann Scher acted as a straw buyer who in exchange for a fee allowed her identity and credit to be used in the purchase of 217 San Sebastian Avenue, Coral Gables, Florida (the “San Sebastian Avenue property”).

23. Karim Goding served as title and closing agent for residential real estate transactions

at Futuristic Title, including on numerous properties on behalf of **GRETA MEDINA**.

24. Margaret Roberts was a realtor, doing business in the Southern District of Florida, who negotiated the purchase transactions with the sellers of the properties on behalf of **GRETA MEDINA**.

COUNT 1
CONSPIRACY TO COMMIT BANK FRAUD
(18 U.S.C. § 1344)

1. Paragraphs 1 through 24 of the General Allegations section of this Superseding Indictment are realleged and fully incorporated herein by reference.

2. From in or around May 2005, through in or around June 2009, the exact dates being unknown to the Grand Jury, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendants,

**GRETA MEDINA,
RICARDO ESTRADA,
MARTIN MERE,
FERNANDA S. ABREU,
DANIA ARGUELLES,
CHRISTIAN GOMEZ,
OBED HERNANDEZ,
YOHAMEL CABALLERO,
ALFONSO VELASCO,
NESTOR COLLANTES,
ANA AVILES,
LEISMY BARCIA, and
ADAN VASQUEZ,**

together and with others known and unknown to the Grand Jury, did willfully, that is, with the intent to further the object of the conspiracy, and knowingly combine, conspire, confederate, and agree together to knowingly, and with intent to defraud, execute, and cause the execution of, a scheme and artifice to defraud one or more financial institutions, including Wells Fargo Bank, which scheme and

artifice would employ a material falsehood, and to knowingly execute, and cause the execution of, a scheme and artifice to obtain money and funds owned by, and under the custody and control of, one or more financial institutions, by means of false and fraudulent pretenses, representations, and promises relating to a material fact, in violation of Title 18, United States Code, Sections 1344(1) and (2).

PURPOSE OF THE CONSPIRACY

3. It was the purpose of the conspiracy for the defendants and their co-conspirators to unlawfully enrich themselves by, among other things: (a) using straw buyers to purchase residential properties in Miami-Dade County, Florida; (b) submitting false and fraudulent mortgage loan applications and related documents to lending institutions, thereby inducing the lending institutions to make mortgage loans to straw buyers for the purchase of the residential properties; (c) causing the lender to loan more money than it otherwise would have loaned by preparing, and submitting to the lender, a false and fraudulent HUD-1 Statement with an inflated purchase price; (d) concealing the fraudulent scheme by, among other things, creating a second version of the HUD-1 Statement to be provided to the seller reflecting the actual purchase price of the property; and (e) diverting fraud proceeds for their personal use and benefit, and to further the fraud scheme.

MANNER AND MEANS OF CONSPIRACY

The manner and means by which the defendants and their co-conspirators sought to accomplish the object and purpose of the conspiracy included, among others, the following:

4. **GRETA MEDINA** identified certain residential properties in Miami-Dade County, Florida that could be used to defraud lenders. **MEDINA** recruited individuals, and paid others to recruit individuals, who would pose as buyers of the identified residential properties for a fee.

Margaret Roberts negotiated the purchase transactions with the sellers of the properties as the real estate agent on behalf of **MEDINA**.

5. **MARTIN MERE, DANIA ARGUELLES, FERNANDA S. ABREU, and OBED HERNANDEZ** were recruiters used by **GRETA MEDINA** to recruit straw buyers in connection with the fraudulent purchases of the identified residential properties. Among the individuals recruited to serve as straw buyers were co-conspirators **YOHAMEL CABALLERO, ADAN VASQUEZ, ALFONSO VELASCO, NESTOR COLLANTES, ANA AVILES, LEISMY BARCIA**, Alberto Lopera, and Melissa Ann Scher.

6. **GRETA MEDINA** and **RICARDO ESTRADA** prepared, and caused to be prepared, fraudulent mortgage loan applications and other related documents on behalf of the straw buyers. The loan applications contained false representations of the buyers' income, deposits, intent to occupy the property as a primary residence, and other information necessary for the lender, Wells Fargo Bank, to assess the straw buyers' supposed qualifications to borrow funds to purchase the identified properties. The false and fraudulent documents were used to induce the lender, Wells Fargo Bank, to fund mortgage loans to purchase the identified residential properties. **MEDINA** and other co-conspirators paid **ESTRADA** moneys to reward him for processing these fraudulent loan transactions in his capacity as an employee of Wells Fargo Bank.

7. The straw buyers, for a fee, allowed their identities and credit information to be used in the false and fraudulent mortgage loan applications for the purchase of the identified residential properties. The straw buyers represented themselves to be the true buyers of the residential properties and the individuals responsible for making payments on the loans. In truth and in fact, the straw buyers were not the actual purchasers of the property. Neither **GRETA MEDINA**,

Margaret Roberts, nor the straw buyers ever disclosed this understanding to the lender, Wells Fargo Bank.

8. The lender approved the mortgage applications. Once the mortgage applications were approved, the loan proceeds from the lender, Wells Fargo Bank, would be wired to the title agent in Miami, Florida for distribution at the closing of the residential sale transaction.

9. At the time of the closings, Karim Goding and other co-conspirators created, and caused to be created, two false and fraudulent HUD-1 Statements. The first HUD-1 Statement would be submitted to the seller (the "seller HUD-1"), and it reflected the actual purchase price to be paid to the seller for the residential property. The seller HUD-1 fraudulently reflected a significantly smaller loan amount than the loan amount actually borrowed from the lender so as not to raise the seller's suspicions as to the fraudulent nature of the transaction.

10. Karim Goding and other co-conspirators also created, and caused to be created, a second HUD-1 Statement for the same transactions but given to the lender (the "lender HUD-1"). The lender HUD-1 would reflect an inflated purchase price, and was intended to induce the lender to fund the property loans at a significantly inflated value over the actual purchase price paid to the seller of the residential property.

11. **GRETA MEDINA** fraudulently diverted loan proceeds to further the fraudulent loan scheme and for her own personal benefit and that of her co-conspirators. **MEDINA** and Karim Goding and other co-conspirators fraudulently caused title companies to disburse the loan proceeds in a manner contrary to the disbursement represented by the parties in the HUD-1 Statements sent to the lender. **MEDINA, DANIA ARGUELLES, CHRISTIAN GOMEZ, ALFONSO VELASCO,** and **FERNANDA S. ABREU** received loan proceeds directly from the title company

for distribution to the other co-conspirators and to enrich themselves. In many instances, **MEDINA**, Goding and other co-conspirators used the loan proceeds to pay the cash to close obligations of the straw buyers whereas the lender HUD-1 Statements indicated those payments were to be made by the borrower. **MEDINA** further used the loan proceeds from the original loans along with loan proceeds from HELOCs taken on the same properties to pay recruiters and straw buyers for their participation in the mortgage fraud scheme.

12. In some instances, **GRETA MEDINA** and other co-conspirators made mortgage payments on the properties to conceal the fraudulent nature of the transactions. Ultimately, the co-conspirators stopped making mortgage payments, causing the properties to go into foreclosure and resulting in substantial losses to the lenders.

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

COUNTS 2 - 13
BANK FRAUD
(18 U.S.C. § 1344)

1. From in or around May 2005, through in or around June 2009, the exact dates being unknown to the Grand Jury, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendants,

GRETA MEDINA,
RICARDO ESTRADA,
MARTIN MERE,
FERNANDA S. ABREU,
DANIA ARGUELLES,
CHRISTIAN GOMEZ,
OBED HERNANDEZ,
YOHAMEL CABALLERO,
ALFONSO VELASCO,
NESTOR COLLANTES,
ANA AVILES,

**LEISMY BARCIA, and
ADAN VASQUEZ,**

did knowingly, and with intent to defraud, execute, and attempt to execute, and cause the execution of, a scheme and artifice to defraud one or more financial institutions, including Wells Fargo Bank, which scheme and artifice employed a material falsehood, and did knowingly execute, and attempt to execute, and cause the execution of, a scheme and artifice to obtain moneys and funds owned by, and under the custody and control of one or more financial institutions, by means of false and fraudulent pretenses, representations, and promises relating to a material fact, in violation of Title 18, United States Code, Sections 1344(1) and (2).

PURPOSE OF THE SCHEME AND ARTIFICE

2. It was the purpose of the scheme and artifice for the defendants and their accomplices to unlawfully enrich themselves by, among other things: (a) using straw buyers to purchase residential properties in Miami-Dade County, Florida; (b) submitting false and fraudulent mortgage loan applications and related documents to lending institutions, thereby inducing the lending institutions to make mortgage loans to straw buyers for the purchase of the residential properties; (c) causing the lender to loan more money than it otherwise would have loaned by preparing, and submitting to the lender, a false and fraudulent HUD-1 Statement with an inflated purchase price; (d) concealing the fraudulent scheme by, among other things, creating a second version of the HUD-1 Statement to be provided to the seller reflecting the actual purchase price of the property; and (e) diverting fraud proceeds for their personal use and benefit, and to further the fraud scheme.

THE SCHEME AND ARTIFICE

3. Paragraphs 4 through 12 of the Manner and Means section of Count 1 of this Superseding Indictment are realleged and fully incorporated herein by reference as a description of the scheme and artifice.

EXECUTIONS OF THE SCHEME AND ARTIFICE

4. On or about the dates specified as to each count below, in the Southern District of Florida, and elsewhere, the defendants, as specified in each count, did execute the scheme and artifice, and did cause said scheme and artifice to be executed, as more particularly described in each count set forth below:

COUNT	APPROX. DATE	DEFENDANTS	ACT IN EXECUTION
2	May 31, 2005	GRETA MEDINA, RICARDO ESTRADA, OBED HERNANDEZ, CHRISTIAN GOMEZ, and NESTOR COLLANTES	Submission to Wells Fargo Bank of fraudulent closing documents for a \$1,500,000 residential loan for the purchase of the Jade property – Unit 4303
3	August 5, 2005	RICARDO ESTRADA, FERNANDA S. ABREU, and LEISMY BARCIA	Submission to Wells Fargo Bank of fraudulent closing documents for a \$1,620,000 residential loan for the purchase of the Jade property – Unit 4503
4	August 12, 2005	GRETA MEDINA, and RICARDO ESTRADA,	Submission to Wells Fargo Bank of fraudulent closing documents for a \$552,000 residential loan for the purchase of the Benevento Avenue property

COUNT	APPROX. DATE	DEFENDANTS	ACT IN EXECUTION
5	September 23, 2005	GRETA MEDINA and RICARDO ESTRADA	Submission to Wells Fargo Bank of fraudulent closing documents for a \$1,365,000 residential loan for the purchase of the Jade property – Unit 3503
6	October 20, 2005	GRETA MEDINA, RICARDO ESTRADA, and MARTIN MERE	Submission to Wells Fargo Bank of fraudulent closing documents for a \$975,000 residential loan for the purchase of the San Sebastian Avenue property
7	November 8, 2005	GRETA MEDINA, RICARDO ESTRADA, and ANA V. AVILES	Submission to Wells Fargo Bank of fraudulent closing documents for a \$1,000,000 residential loan for the purchase of the Jade property – Unit 4109
8	December 27, 2005	RICARDO ESTRADA, DANIA ARGUELLES, and YOHAMEL CABALLERO	Submission to Wells Fargo Bank of fraudulent closing documents for a \$1,228,000 residential loan for the purchase of the Ferdinand Street property
9	March 31, 2006	GRETA MEDINA, RICARDO ESTRADA, and ADAN VASQUEZ	Submission to Wells Fargo Bank of fraudulent closing documents for a \$1,413,750 residential loan for the purchase of the Jade property – Unit 3203
10	May 16, 2006	GRETA MEDINA, RICARDO ESTRADA, and ALFONSO VELASCO	Submission to Wells Fargo Bank of fraudulent closing documents for a \$1,466,400 residential loan for the purchase of the Jade property – Unit 2605

COUNT	APPROX. DATE	DEFENDANTS	ACT IN EXECUTION
11	July 24, 2006	GRETA MEDINA, RICARDO ESTRADA, and ANA AVILES,	Submission to Wells Fargo Bank of fraudulent closing documents for a \$864,000 residential loan for the purchase of the Miller Road property
12	September 5, 2006	GRETA MEDINA and RICARDO ESTRADA	Submission to Wells Fargo Bank of fraudulent closing documents for a \$1,512,000 residential loan for the purchase of the Jade property – Unit 2809
13	May 25, 2007	GRETA MEDINA, RICARDO ESTRADA, and ANA V. AVILES	Submission to Wells Fargo Bank of fraudulent closing documents for a \$1,480,000 residential loan refinancing the existing loan on the Jade property – Unit 4109

In violation of Title 18, United States Code, Sections 1344(1) and (2) and 2.

COUNTS 14 - 16
RECEIPT OF GIFTS FOR PROCURING LOANS
(18 U.S.C. § 215)

On or about the dates set forth as to each count below, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendant,

RICARDO ESTRADA,

as an employee of Wells Fargo Bank, did knowingly and corruptly accept and agree to accept from any person anything of a value in excess of \$1,000, as described in each count below, intending to be influenced and rewarded in connection with any business and transaction of such institution:

COUNT	APPROX. DATE	DEFENDANT	DESCRIPTION OF COMMISSIONS OR GIFTS
14	November 4, 2005	RICARDO ESTRADA	\$10,000 to J.M. by GRETA MEDINA for RICARDO ESTRADA
15	June 23, 2006	RICARDO ESTRADA	\$5,000 to J.M. by Margaret Roberts for RICARDO ESTRADA
16	September 18, 2006	RICARDO ESTRADA	\$10,000 to J.M. by I.N. for RICARDO ESTRADA

In violation of Title 18, United States Code, Sections 215(a)(2) and 2.

COUNTS 17 - 18
RECEIPT OF GIFTS FOR PROCURING LOANS
(18 U.S.C. § 215)

On or about the dates set forth as to each count below, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendant,

GRETA MEDINA,

did knowingly and corruptly give, offer, and promise anything of a value in excess of \$1,000, as described in each count below, to an employee of Wells Fargo Bank, a federally insured financial institution, with the intent to influence and reward such person in connection with any business and transaction with such institution:

COUNT	APPROX. DATE	DEFENDANT	DESCRIPTION OF COMMISSIONS OR GIFTS
17	November 4, 2005	GRETA MEDINA	\$10,000 to J.M. by GRETA MEDINA for RICARDO ESTRADA
18	September 18, 2006	GRETA MEDINA	\$10,000 to J.M. by I.N. for RICARDO ESTRADA

In violation of Title 18, United States Code, Sections 215(a)(1) and 2.

FORFEITURE

1. The General Allegations and the allegations of Counts 1 through 18 of this Superseding Indictment are re-alleged and by this reference fully incorporated herein for the purpose of alleging forfeiture to the United States of America of certain property in which the defendants have an interest.

2. Upon conviction of any violation of Title 18, United States Code, Sections 215, 1349 and 1344, as alleged in Counts 1 through 18 of this Superseding Indictment, the defendants, **GRETA MEDINA, RICARDO ESTRADA, MARTIN MERE, FERNANDA S. ABREU, DANIA ARGUELLES, CHRISTIAN GOMEZ, OBED HERNANDEZ, ALFONSO VELASCO, YOHAMEL CABALLERO, NESTOR COLLANTES, ANA AVILES, LEISMY BARCIA,** and **ADAN VASQUEZ**, shall forfeit to the United States any property constituting, or derived from, any proceeds the defendants obtained directly or indirectly, as the result of such violation, pursuant to Title 18, United States Code, Section 982(a)(2)(A).

3. The property subject to forfeiture includes, but is not limited to, the following property: a money judgment in the amount of \$9,767,000, which represents the proceeds obtained by the defendants as the result of the bank fraud scheme.

4. Pursuant to Title 21, United States Code, Section 853(p), as incorporated by reference by Title 18, United States Code, Section 982(b), if any of the forfeitable property, or any portion thereof, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred, or sold to, or deposited with a third party;
- 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;

it is the intent of the United States to seek the forfeiture of other property of the defendants up to the value of the above-described forfeitable properties.

All pursuant to Title 18, United States Code, Sections 982(a)(2)(A) and 982(b) and the procedures set forth at Title 21, United States Code, Section 853.

FOREPERSON



JEFFREY H. SLOMAN
UNITED STATES ATTORNEY



PETER A. FORAND
ASSISTANT UNITED STATES ATTORNEY

UNITED STATES OF AMERICA

CASE NO. 09-21028-CR-Lenard/Turnoff(s)

vs.

CERTIFICATE OF TRIAL ATTORNEY*

GRETA MEDINA, ET AL.,

Defendants.

Superseding Case Information:

Court Division: (Select One)

New Defendant(s) Yes X No
Number of New Defendants 7
Total number of counts 18

X Miami Key West
 FTL WPB FTP

I do hereby certify that:

- I have carefully considered the allegations of the indictment, the number of defendants, the number of probable witnesses and the legal complexities of the Indictment/Information attached hereto.
- I am aware that the information supplied on this statement will be relied upon by the Judges of this Court in setting their calendars and scheduling criminal trials under the mandate of the Speedy Trial Act, Title 28 U.S.C. Section 3161.
- Interpreter: (Yes or No) Yes
List language and/or dialect Spanish
- This case will take 21 days for the parties to try.

5. Please check appropriate category and type of offense listed below:

(Check only one)	(Check only one)
I 0 to 5 days <u> </u>	Petty <u> </u>
II 6 to 10 days <u> </u>	Minor <u> </u>
III 11 to 20 days <u> </u>	Misdem. <u> </u>
IV 21 to 60 days <u>X</u>	Felony <u>X</u>
V 61 days and over <u> </u>	

6. Has this case been previously filed in this District Court? (Yes or No) Yes

If yes: Judge: Joan A Lenard Case No. 09-21028-CR-Lenard/Turnoff

(Attach copy of dispositive order)
Has a complaint been filed in this matter? (Yes or No) No

If yes:
Magistrate Case No. _____
Related Miscellaneous numbers: _____
Defendant(s) in federal custody as of _____
Defendant(s) in state custody as of _____
Rule 20 from the _____ District of _____

Is this a potential death penalty case? (Yes or No) No

7. Does this case originate from a matter pending in the Northern Region of the U.S. Attorney's Office prior to October 14, 2003? Yes X No

8. Does this case originate from a matter pending in the Central Region of the U.S. Attorney's Office prior to September 1, 2007? Yes X No

PETER A. FORAND
ASSISTANT UNITED STATES ATTORNEY
Florida Bar No. 682268

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: GRETA MEDINA

Case No: 09-21028-CR-Lenard/Turnoff(s)

Count No.: 1

Conspiracy to Commit Bank Fraud

Title 18, United States Code, Section 1349

***Max. Penalty:** Thirty Years' Imprisonment

Count Nos.: 2, 4-7, 9-13

Bank Fraud

Title 18, United States Code, Section 1344

*** Max. Penalty:** Thirty Years' Imprisonment

Count Nos.: 17-18

Receipt of Gifts for Procuring Loan

Title 18, United States Code, Section 215

*** Max. Penalty:** Thirty Years' Imprisonment

*** Refers only to possible term of incarceration, does not include possible fines, restitution, special assessments, parole terms, or forfeitures that may be applicable.**

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: RICARDO ESTRADA **Case No:** 09-21028-CR-Lenard/Turnoff(s)

Count No.: 1

Conspiracy to Commit Bank Fraud

Title 18, United States Code, Section 1349

***Max. Penalty:** Thirty Years' Imprisonment

Count Nos.: 2-13

Bank Fraud

Title 18, United States Code, Section 1344

*** Max. Penalty:** Thirty Years' Imprisonment

Count Nos.: 14-16

Receipt of Gifts for Procuring Loan

Title 18, United States Code, Section 215

*** Max. Penalty:** Thirty Years' Imprisonment

*** Refers only to possible term of incarceration, does not include possible fines, restitution, special assessments, parole terms, or forfeitures that may be applicable.**

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: MARTIN MERE

Case No: 09-21028-CR-Lenard/Turnoff(s)

Count No.: 1

Conspiracy to Commit Bank Fraud

Title 18, United States Code, Section 1349

***Max. Penalty:** Thirty Years' Imprisonment

Count No.: 6

Bank Fraud

Title 18, United States Code, Section 1344

*** Max. Penalty:** Thirty Years' Imprisonment

*** Refers only to possible term of incarceration, does not include possible fines, restitution, special assessments, parole terms, or forfeitures that may be applicable.**

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: FERNANDA S. ABREU **Case No:** 09-21028-CR-Lenard/Turnoff(s)

Count No.: 1

Conspiracy to Commit Bank Fraud

Title 18, United States Code, Section 1349

***Max. Penalty:** Thirty Years' Imprisonment

Count No.: 3

Bank Fraud

Title 18, United States Code, Section 1344

*** Max. Penalty:** Thirty Years' Imprisonment

*** Refers only to possible term of incarceration, does not include possible fines, restitution, special assessments, parole terms, or forfeitures that may be applicable.**

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: DANIA ARGUELLES **Case No:** 09-21028-CR-Lenard/Turnoff(s)

Count No.: 1

Conspiracy to Commit Bank Fraud

Title 18, United States Code, Section 1349

***Max. Penalty:** Thirty Years' Imprisonment

Count No.: 8

Bank Fraud

Title 18, United States Code, Section 1344

*** Max. Penalty:** Thirty Years' Imprisonment

*** Refers only to possible term of incarceration, does not include possible fines, restitution, special assessments, parole terms, or forfeitures that may be applicable.**

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: CHRISTIAN GOMEZ Case No: 09-21028-CR-Lenard/Turnoff(s)

Count No.: 1

Conspiracy to Commit Bank Fraud

Title 18, United States Code, Section 1349

***Max. Penalty:** Thirty Years' Imprisonment

Count No.: 2

Bank Fraud

Title 18, United States Code, Section 1344

*** Max. Penalty:** Thirty Years' Imprisonment

*** Refers only to possible term of incarceration, does not include possible fines, restitution, special assessments, parole terms, or forfeitures that may be applicable.**

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: OBED HERNANDEZ **Case No:** 09-21028-CR-Lenard/Turnoff(s)

Count No.: 1

Conspiracy to Commit Bank Fraud

Title 18, United States Code, Section 1349

***Max. Penalty:** Thirty Years' Imprisonment

Count No.: 2

Bank Fraud

Title 18, United States Code, Section 1344

*** Max. Penalty:** Thirty Years' Imprisonment

*** Refers only to possible term of incarceration, does not include possible fines, restitution, special assessments, parole terms, or forfeitures that may be applicable.**

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: YOHAMEL CABALLERO **Case No:** 09-21028-CR-Lenard/Turnoff(s)

Count No.: 1

Conspiracy to Commit Bank Fraud

Title 18, United States Code, Section 1349

***Max. Penalty:** Thirty Years' Imprisonment

Count No.: 8

Bank Fraud

Title 18, United States Code, Section 1344

*** Max. Penalty:** Thirty Years' Imprisonment

*** Refers only to possible term of incarceration, does not include possible fines, restitution, special assessments, parole terms, or forfeitures that may be applicable.**

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: ALFONSO VELASCO Case No: 09-21028-CR-Lenard/Turnoff(s)

Count No.: 1

Conspiracy to Commit Bank Fraud

Title 18, United States Code, Section 1349

***Max. Penalty:** Thirty Years' Imprisonment

Count No.: 10

Bank Fraud

Title 18, United States Code, Section 1344

*** Max. Penalty:** Thirty Years' Imprisonment

*** Refers only to possible term of incarceration, does not include possible fines, restitution, special assessments, parole terms, or forfeitures that may be applicable.**

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: NESTOR COLLANTES **Case No:** 09-21028-CR-Lenard/Turnoff(s)

Count No.: 1

Conspiracy to Commit Bank Fraud

Title 18, United States Code, Section 1349

***Max. Penalty:** Thirty Years' Imprisonment

Count No.: 2

Bank Fraud

Title 18, United States Code, Section 1344

*** Max. Penalty:** Thirty Years' Imprisonment

*** Refers only to possible term of incarceration, does not include possible fines, restitution, special assessments, parole terms, or forfeitures that may be applicable.**

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: ANA V. AVILES **Case No:** 09-21028-CR-Lenard/Turnoff(s)

Count No.: 1

Conspiracy to Commit Bank Fraud

Title 18, United States Code, Section 1349

***Max. Penalty:** Thirty Years' Imprisonment

Count No.: 7, 11, 13

Bank Fraud

Title 18, United States Code, Section 1344

*** Max. Penalty:** Thirty Years' Imprisonment

*** Refers only to possible term of incarceration, does not include possible fines, restitution, special assessments, parole terms, or forfeitures that may be applicable.**

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: LEISMY BARCIA

Case No: 09-21028-CR-Lenard/Turnoff(s)

Count No.: 1

Conspiracy to Commit Bank Fraud

Title 18, United States Code, Section 1349

***Max. Penalty:** Thirty Years' Imprisonment

Count No.: 3

Bank Fraud

Title 18, United States Code, Section 1344

*** Max. Penalty:** Thirty Years' Imprisonment

*** Refers only to possible term of incarceration, does not include possible fines, restitution, special assessments, parole terms, or forfeitures that may be applicable.**

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: ADAN VASQUEZ

Case No: 09-21028-CR-Lenard/Turnoff(s)

Count No.: 1

Conspiracy to Commit Bank Fraud

Title 18, United States Code, Section 1349

***Max. Penalty:** Thirty Years' Imprisonment

Count No.: 9

Bank Fraud

Title 18, United States Code, Section 1344

*** Max. Penalty:** Thirty Years' Imprisonment

*** Refers only to possible term of incarceration, does not include possible fines, restitution, special assessments, parole terms, or forfeitures that may be applicable.**

No. 09-21028-CR-Lenard/Turnoff(s)

UNITED STATES DISTRICT COURT

-----SOUTHERN----- District of -----FLORIDA-----

THE UNITED STATES OF AMERICA

vs.

GRETA MEDINA, ET AL.

Defendants.

INDICTMENT

- 18 U.S.C. § 1349
- 18 U.S.C. § 1344
- 18 U.S.C. § 215
- 18 U.S.C. § 2
- 18 U.S.C. § 982

A true bill.

Jean Harris
Foreman

FGJ 09-105 (MIA)

Filed in open court this 6th day, 9th day,

of April----- A.D. 2010

Clerk

Bail, \$ -----

**Federal Grand Jury
Indictment Number**
09-105-ECS 0148