

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION**

UNITED STATES OF AMERICA,)	No. 11-00261-01/02-CR-W-GAF
)	
Plaintiff,)	Count One
)	18 U.S.C. § 1349
v.)	NMT 30 Years Imprisonment
)	NMT \$1,000,000 Fine
ROBERT CHARLES RAMIREZ,)	NMT 5 years Supervised Release
[DOB: 10/13/1974])	Class A Felony
)	
and)	Counts Two through Twenty
)	18 U.S.C. §§ 1344 and 2
WILLIAM TROY GOINGS,)	NMT 30 Years Imprisonment
a/k/a Troy Goings,)	NMT \$1,000,000 Fine
[DOB: 07/24/1975])	NMT 5 Years Supervised Release
)	Class A Felony
Defendants.)	
)	\$100 Special Assessment On Each Count.
)	
)	Restitution May Be Ordered.

SUPERSEDING INDICTMENT

THE GRAND JURY CHARGES THAT:

COUNT ONE

Introduction

1. At all times material herein:
 - a. Defendant ROBERT CHARLES RAMIREZ was a resident of California. He acted as a finder for potential borrowers and prepared loan application documents for the borrowers he found; he also worked with defendant William Troy Goings. Defendant RAMIREZ also had a business in the name C&D Financial Group, organized in California. He had bank accounts in his and his wife's names, and in the name of C&D Financial Group, at Bank of America, California.

b. Defendant WILLIAM TROY GOINGS was a resident of California. He acted as a finder for potential borrowers with RAMIREZ and prepared loan application documents for the borrowers he found. He was associated with a business in the name Capital Credit Corporation.

c. C.P. was a mortgage broker in California and the owner and operator of Capital Pro Lending, a mortgage brokerage business in California. Capital Pro Lending had a bank account at Bank of America, Folsom, California.

d. American Sterling Bank, Sugar Creek, Missouri, was a financial institution, the deposits of which were insured by the Federal Deposit Insurance Corporation; it was engaged in the business of making mortgage loans. Its loan processing office was in Sacramento, California; it funded loans from its headquarters in Sugar Creek, Missouri.

e. Metcalf Bank, Lee's Summit, Missouri, was a financial institution, the deposits of which were insured by the Federal Deposit Insurance Corporation. It had locations in Missouri and elsewhere.

The Conspiracy and Its Object

2. Beginning on or about October 11, 2006, and continuing through on or about January 18, 2007, at Sugar Creek, Missouri, in the Western District of Missouri, and elsewhere, defendants ROBERT CHARLES RAMIREZ and WILLIAM TROY GOINGS, a/k/a Troy Goings, conspired and agreed with each other and others known and unknown to the Grand Jury to execute and participate in the execution of a scheme to defraud and to obtain money from American Sterling Bank by means of material false and fraudulent pretenses, representations and promises, and by the concealment of material facts, and in the execution of the said scheme obtained money owned by

and under the custody or control of American Sterling Bank by such means in violation of Title 18, United States Code, Sections 1344 and 2.

Purpose of the Conspiracy

3. The purpose of the conspiracy was to obtain money for and other benefits to the defendants and others by causing American Sterling Bank to approve and make mortgage loans which it otherwise would not approve and make, which loans were given in reliance on material false and fraudulent representations and promises stated in loan applications and other documents.

Fraudulent Scheme

4. It was part of the scheme that the defendants:

- a. found and solicited individuals desirous of obtaining loans for the purchase and refinance of properties in California;
- b. prepared and caused to be prepared loan applications and supporting documentation containing material false and fraudulent representations and omissions of fact, and falsified credit history reports;
- c. submitted and caused to be submitted the material false and fraudulent loan applications, supporting documentation, and credit history reports to American Sterling Bank;
- d. caused American Sterling Bank to approve the loan applications and fund loans in reliance on the material false, fraudulent and misleading representations and omissions of fact contained in the mortgage loan applications and other documentation including the false credit history reports; and
- e. obtained and attempted to obtain personal financial and other benefits as a result of the scheme.

Manner and Means

5. It was part of the conspiracy that, beginning on or about October 11, 2006, and continuing through on or about January 18, 2007, defendant RAMIREZ began doing business with C.P., acting as a finder of individuals who wanted to apply for home loans and preparing loan applications and supporting documentation in connection with the loan applications.

6. It was further part of the conspiracy that defendant GOINGS worked with defendant RAMIREZ in his activities.

7. It was further part of the conspiracy that defendants RAMIREZ and GOINGS prepared and caused to be prepared loan applications and documentation, including false and fraudulent credit history reports, containing material false and fraudulent representations and promises, including income, assets and liabilities, and credit history, and material omissions of fact.

8. It was further part of the conspiracy that defendants RAMIREZ and GOINGS submitted and caused to be submitted to American Sterling Bank the false and fraudulent loan applications, supporting documentation, and credit histories.

9. It was further part of the conspiracy that defendants RAMIREZ and GOINGS caused American Sterling Bank to approve the loan applications in reliance on the material false, fraudulent and misleading representations and omissions of facts contained in loan applications, supporting documentation, and credit histories.

10. It was further part of the conspiracy that defendants RAMIREZ and GOINGS obtained financial and other benefits as a result of the scheme.

Acts in Furtherance of the Conspiracy

11. In furtherance of and to effect the objectives of the conspiracy, and to accomplish its purposes and objectives, defendants RAMIREZ and GOINGS committed and caused to be committed the following acts, among others, in Sugar Creek, in the Western District of Missouri, and elsewhere:

2750 Saint Andrews Drive, Brentwood, California

- a. On or about October 11, 2006, defendants falsified credit reports for D.J.G.
- b. On or before October 11, 2006, defendants prepared false loan applications for D.J.G., including falsifying the name of the broker, forging the name of F.A.M. on the application as the broker, and falsifying the employment of F.A.M.
- c. On or about October 11, 2006, defendants submitted to American Sterling Bank false loan applications and false credit reports for D.J.G. to obtain two loans in the approximate amount of \$926,000 to refinance two loans on the property at 2750 Saint Andrews Drive, Brentwood, California.
- d. On or about November 1, 2006, defendants caused American Sterling Bank to approve and fund mortgage loans in the approximate amounts of \$764,000 and \$162,000 in reliance on the material false and fraudulent representations and omissions.
- e. On or about November 1, 2006, defendant RAMIREZ obtained \$17,478 from the loan proceeds, which was deposited to his account in the name C&D Financial Group.

5408 E. Dakota, Fresno, California

- f. On or about October 18, 2006, defendants falsified a credit report for G.J.

g. On or about October 18, 2006, defendants prepared a false loan application for G.J., including falsifying the name of the broker, forging the name of F.A.M. on the application as the broker, and falsifying the employment of F.A.M.

h. On or about October 18, 2006, defendants submitted to American Sterling Bank a false loan application and false credit report for G.J. to obtain a loan in the approximate amount of \$300,000 for the purchase of 5408 E. Dakota, Fresno, California.

i. On or about November 14, 2006, defendants caused American Sterling Bank to approve and fund a mortgage loan in the approximate amount of \$300,000 in reliance on the material false and fraudulent representations and omissions.

j. On or about November 17, 2006, defendant RAMIREZ obtained \$7,850 from the loan proceeds, which was deposited to his account in the name C&D Financial Group.

5793 Muldrow Road, Sacramento, California

k. On or about October 19, 2006, defendants falsified a credit report for T.T.

l. On or about October 19, 2006, defendants prepared false loan applications for T.T., including falsifying the name of the broker, forging the name of F.A.M. on the application as the broker, and falsifying the employment of F.A.M.

m. On or about October 19, 2006, defendants submitted to American Sterling Bank false loan applications and false credit reports for T.T. to obtain two loans in the approximate amount of \$232,750 to refinance two loans on the property at 5793 Muldrow Road, Sacramento, California.

n. On or about November 30, 2006, defendants caused American Sterling Bank to approve and fund mortgage loans in the approximate amount of \$232,750 in reliance on the material false and fraudulent representations and omissions.

o. On or about November 30, 2006, defendant RAMIREZ obtained \$5,374.08 from the loan proceeds, which was deposited to his account in the name C&D Financial Group.

6840 Blue Duck Way, Sacramento, California

p. On or about October 19, 2006, defendants falsified credit reports for A.S.

q. On or about October 19, 2006, defendants prepared false loan applications for A.S., including falsifying the name of the broker, forging the name of F.A.M. on the application as the broker, and falsifying the employment of F.A.M.

r. On or about October 19, 2006, defendants submitted to American Sterling Bank false loan applications and false credit reports for A.S. to obtain two loans in the approximate amount of \$310,000 to refinance two loans on the property at 6840 Blue Duck Way, Sacramento, California.

s. On or about November 30, 2006, defendants caused American Sterling Bank to approve and fund mortgage loans in the approximate amount of \$310,000 in reliance on the material false and fraudulent representations and omissions.

t. On or about November 30, 2006, defendant RAMIREZ obtained \$10,778.46 from the loan proceeds, which was deposited to his account in the name C&D Financial Group.

17 Lily Pond Court, Sacramento, California

u. On or about October 31, 2006, defendants falsified credit reports for E.P.

v. On or about October 31, 2006, defendants prepared false loan applications for E.P., including falsifying the name of the broker, forging the name of F.A.M. on the application as the broker, and falsifying the employment of F.A.M.

w. On or about October 31, 2006, defendants submitted to American Sterling Bank false loan applications and false credit reports for E.P. to obtain two loans in the approximate amount of \$485,000 for the purchase of 17 Lily Pond Court, Sacramento, California.

x. On or about November 9, 2006, defendants caused American Sterling Bank to approve and fund mortgage loans in the approximate amount of \$485,000 in reliance on the material false and fraudulent representations and omissions.

6748 Hedgewood Drive, Sacramento, California

y. On or about November 3, 2006, defendants falsified credit reports for C.D.

z. On or about November 3, 2006, defendants prepared false loan applications for C.D., including falsifying the name of the broker, forging the name of F.A.M. on the application as the broker, and falsifying the employment of F.A.M.

a1. On or about November 3, 2006, defendants submitted to American Sterling Bank false loan applications and false credit reports for C.D. to obtain two loans in the approximate amount of \$334,000 to purchase the property at 6748 Hedgewood Drive, Sacramento, California.

b1. On or about November 16, 2006, defendants caused American Sterling Bank to approve and fund mortgage loans in the approximate amount of \$334,000 in reliance on the material false and fraudulent representations and omissions.

c1. On or about November 17, 2006, defendant RAMIREZ obtained \$7,423.22 from the loan proceeds, which was deposited to his account in the name C&D Financial Group.

2170 51st Avenue, Sacramento, California

d1. On or about November 13, 2006, defendants falsified a credit report for C.G.

e1. On or about November 13, 2006, defendants prepared a false loan application for C.G., including falsifying the name of the broker, forging the name of F.A.M. on the application as the broker, and falsifying the employment of F.A.M.

f1. On or about November 13, 2006, defendants submitted to American Sterling Bank a false loan application and false credit report for C.G. to obtain a loan in the approximate amount of \$199,600 to refinance a loan on the property at 2170 51st Avenue, Sacramento, California.

g1. On or about November 29, 2006, defendants caused American Sterling Bank to approve and fund a mortgage loan in the approximate amount of \$199,600 in reliance on the material false and fraudulent representations and omissions.

h1. On or about November 29, 2006, defendant RAMIREZ obtained \$9,364.84 from the loan proceeds, which was deposited to his account in the name C &D Financial Group.

3412 N. Fourth Street, Fresno, California

i1. On or about November 13, 2006, defendants falsified a credit report for J.G.

j1. On or about November 13, 2006, defendants prepared a false loan application for J.G., including falsifying the name of the broker, forging the name of F.A.M. on the application as the broker, and falsifying the employment of F.A.M.

k1. On or about November 13, 2006, defendants submitted to American Sterling Bank a false loan application and false credit report for J.G. to obtain a loan in the approximate amount of \$220,000 to refinance a loan on the property at 3412 N. Fourth Street, Fresno, California.

11. On or about December 6, 2006, defendants caused American Sterling Bank to approve and fund a mortgage loan in the approximate amount of \$220,000 in reliance on the material false and fraudulent representations and omissions.

m1. On or about December 6, 2006, defendant RAMIREZ obtained \$8,200 from the loan proceeds, which was deposited to his account in the name C&D Financial Group.

4200 N. Montego Lane, Clovis, California

n1. On or about November 16, 2006, defendants falsified a credit report for A.R.

o1. On or about November 16, 2006, defendants prepared a false loan application for A.R., including falsifying the name of the broker, forging the name of F.A.M. on the application as the broker, and falsifying the employment of F.A.M.

p1. On or about November 16, 2006, defendants submitted to American Sterling Bank a false loan application and false credit report for A.R. to obtain a loan in the approximate amount of \$570,000 to refinance two loans on the property at 4200 N. Montego Lane, Clovis, California.

q1. On or about December 6, 2006, defendants caused American Sterling Bank to approve and fund a mortgage loan in the approximate amount of \$570,000 in reliance on the material false and fraudulent representations and omissions.

r1. On or about December 6, 2006, defendant RAMIREZ obtained \$7,760.67 from the loan proceeds, which was deposited to his account in the name C&D Financial Group.

1995 Bass Lake Avenue, Tulare, California

s1. On or about November 17, 2006, defendants falsified credit reports for L.A.M.

t1. On or about November 17, 2006, defendants prepared false loan applications for L.A.M., including falsifying the name of the broker, forging the name of F.A.M. on the application as the broker, and falsifying the employment of F.A.M.

u1. On or about November 17, 2006, defendants submitted to American Sterling Bank false loan applications and false credit reports for L.A.M. to obtain two loans in the approximate amount of \$313,500 to refinance one loan on the property at 1995 Bass Lake Avenue, Tulare, California.

v1. On or about December 15, 2006, defendants caused American Sterling Bank to approve and fund mortgage loans in the approximate amount of \$313,500 in reliance on the material false and fraudulent representations and omissions.

w1. On or about December 15, 2006, defendant RAMIREZ obtained \$2,501.73 from the loan proceeds, which was deposited to his account in the name C&D Financial Group.

413 Roundhill Drive, Brentwood, California

x1. On or about November 21, 2006, defendants falsified credit reports for E.O.

y1. On or about November 21, 2006, defendants prepared false loan applications for E.O., including falsifying the name of the broker, forging the name of F.A.M. on the application as the broker, and falsifying the employment of F.A.M.

z1. On or about November 21, 2006, defendants submitted to American Sterling Bank false loan applications and false credit reports for E.O. to obtain two loans in the approximate amount of \$1,037,000 to refinance two loans on the property at 413 Roundhill Drive, Brentwood, California.

a2. On or about December 21, 2006, defendants caused American Sterling Bank to approve and fund mortgage loans in the approximate amount of \$1,037,000 in reliance on the material false and fraudulent representations and omissions.

b2. On or about December 21, 2006, defendant RAMIREZ obtained \$28,063 from the loan proceeds, which was deposited to his account in the name C&D Financial Group.

6668 N. West Avenue, Fresno, California

c2. On or about November 24, 2006, defendants falsified a credit report for R.L.

d2. On or about November 24, 2006, defendants prepared a false loan application for R.L., including falsifying the name of the broker, forging the name of F.A.M. on the application as the broker, and falsifying the employment of F.A.M.

e2. On or about November 24, 2006, defendants submitted to American Sterling Bank a false loan application and false credit report for R.L. to obtain a loan in the approximate amount of \$288,000 to refinance a loan on the property at 6668 N. West Avenue, Fresno, California.

f2. On or about December 27, 2006, defendants caused American Sterling Bank to approve and fund a mortgage loan in the approximate amount of \$288,000 in reliance on the material false and fraudulent representations and omissions.

g2. On or about December 27, 2006, defendant RAMIREZ obtained \$4,100 from the loan proceeds, which was deposited to his account in the name C&D Financial Group.

1604 W. Fir Avenue, Lompoc, California

h2. On or about November 24, 2006, defendants falsified credit reports for J.G.

i2. On or about November 24, 2006, defendants prepared false loan applications for J.G., including falsifying the name of the broker, forging the name of F.A.M. on the application as the broker, and falsifying the employment of F.A.M.

j2. On or about November 24, 2006, defendants submitted to American Sterling Bank false loan applications and false credit reports for J.G. to obtain two loans in the approximate amount of \$580,500 to refinance two loans on the property at 1604 W. Fir Avenue, Lompoc, California.

k2. On or about December 27, 2006, defendants caused American Sterling Bank to approve and fund mortgage loans in the approximate amount of \$580,500 in reliance on the material false and fraudulent representations and omissions.

l2. On or about December 27, 2006, defendant RAMIREZ obtained \$17,166.24 from the loan proceeds, which was deposited to his account in the name C&D Financial Group.

10 Shari Lane, Chico, California

m2. On or about November 30, 2006, defendants falsified credit reports for M.A.

n2. On or about November 30, 2006, defendants prepared false loan applications for M.A., including falsifying the name of the broker, forging the name of F.A.M. on the application as the broker, and falsifying the employment of F.A.M.

o2. On or about November 30, 2006, defendants submitted to American Sterling Bank false loan applications and false credit reports for M.A. to obtain two loans in the approximate amount of \$363,850 to refinance two loans on the property at 10 Shari Lane, Chico, California.

p2. On or about January 2, 2007, defendants caused American Sterling Bank to approve and fund mortgage loans in the approximate amount of \$363,850 in reliance on the material false and fraudulent representations and omissions.

q2. On or about January 2, 2007, defendant RAMIREZ obtained \$5,318.51 from the loan proceeds, which was deposited to his account in the name C&D Financial Group.

703 N. Demaree Street, Visalia, California

r2. On or about December 5, 2006, defendants falsified credit reports for R.W.

s2. On or about December 5, 2006, defendants prepared false loan applications for R.W., including falsifying the name of the broker, forging the name of F.A.M. on the application as the broker, and falsifying the employment of F.A.M.

t2. On or about December 5, 2006, defendants submitted to American Sterling Bank false loan applications and false credit reports for R.W. to obtain two loans in the approximate amount of \$346,750 to refinance one loan on the property at 703 N. Demaree Street, Visalia, California.

u2. On or about December 20, 2006, defendants caused American Sterling Bank to approve and fund mortgage loans in the approximate amount of \$346,750 in reliance on the material false and fraudulent representations and omissions.

v2. On or about December 20, 2006, defendant RAMIREZ obtained \$12,480 from the loan proceeds, which was deposited to his account in the name C&D Financial Group.

369 Sycamore Cottage Court, Camarillo, California

w2. On or about December 21, 2006, defendants falsified credit reports for V.M.

x2. On or about December 21, 2006, defendants prepared false loan applications for V.M., including falsifying the name of the broker, forging the name of F.A.M. on the application as the broker, and falsifying the employment of F.A.M.

y2. On or about December 21, 2006, defendants submitted to American Sterling Bank false loan applications and false credit reports for V.M. to obtain two loans in the approximate amount of \$846,000 to refinance two loans on the property at 369 Sycamore Cottage Court, Camarillo, California.

z2. On or about January 29, 2007, defendants caused American Sterling Bank to approve and fund mortgage loans in the approximate amount of \$846,000 in reliance on the material false and fraudulent representations and omissions.

a3. On or about January 29, 2006, defendant RAMIREZ obtained \$32,660 from the loan proceeds, which was deposited to his account in the name C&D Financial Group.

1270 Holly Avenue, Oxnard, California

b3. On or about December 27, 2006, defendants falsified a credit report for G.L.

c3. On or about December 27, 2006, defendants prepared a false loan application for G.L., including falsifying the name of the broker, forging the name of F.A.M. on the application as the broker, and falsifying the employment of F.A.M.

d3. On or about December 27, 2006, defendants submitted to American Sterling Bank a false loan application and false credit report for G.L. to obtain a loan in the approximate amount of \$496,000 to refinance two loans on the property at 1270 Holly Avenue, Oxnard, California.

e3. On or about January 24, 2007, defendants caused American Sterling Bank to approve and fund a mortgage loan in the approximate amount of \$496,000 in reliance on the material false and fraudulent representations and omissions.

f3. On or about January 24, 2007, defendant RAMIREZ obtained \$16,050 from the loan proceeds, which was deposited to his account in the name C&D Financial Group.

2304 Hillard Circle, Antioch, California

g3. On or about December 28, 2006, defendants falsified a credit report for E.B.

h3. On or about December 28, 2006, defendants prepared a false loan application for E.B., including falsifying the name of the broker, forging the name of F.A.M. on the application as the broker, and falsifying the employment of F.A.M.

i3. On or about December 28, 2006, defendants submitted to American Sterling Bank a false loan application and false credit report for E.B. to obtain a loan in the approximate amount of \$470,900 to refinance a loan on the property at 2304 Hillard Circle, Antioch, California.

j3. On or about January 18, 2007, defendants caused American Sterling Bank to approve and fund a mortgage loan in the approximate amount of \$470,900 in reliance on the material false and fraudulent representations and omissions.

k3. On or about January 18, 2007, defendant RAMIREZ obtained \$6,059 from the loan proceeds, which was deposited to his account in the name C&D Financial Group.

2735 Norbert Way, Sacramento, California

l3. On or about December 28, 2006, defendants falsified a credit report for L.L.

m3. On or about December 28, 2006, defendants prepared a false loan application for L.L., including falsifying the name of the broker, forging the name of F.A.M. on the application as the broker, and falsifying the employment of F.A.M.

n3. On or about December 28, 2006, defendants submitted to American Sterling Bank a false loan application and false credit report for L.L. to obtain a loan in the approximate amount of \$272,000 to refinance two loans on the property at 2735 Norbert Way, Sacramento, California.

o3. On or about January 10, 2007, defendants caused American Sterling Bank to approve and fund a mortgage loan in the approximate amount of \$272,000 in reliance on the material false and fraudulent representations and omissions.

p3. On or about January 10, 2007, defendant RAMIREZ obtained \$12,895.84 from the loan proceeds, which was deposited to his account in the name C&D Financial Group.

Summary

q3. In reliance on the material false, fraudulent, and misleading representations and omissions of facts contained in the mortgage loan applications, supporting documentation, and credit reports, American Sterling Bank approved and made loans in the approximate total amount of \$8,587,893. From that total, defendant RAMIREZ received approximately \$211,523 and defendant GOINGS received an amount unknown to the Grand Jury.

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

COUNTS TWO through TWENTY

1. The Grand Jury incorporates by reference paragraphs one through eleven of Count One of the Indictment as if fully set forth herein.

2. On or about the dates listed below, at Sugar Creek, in the Western District of Missouri, and elsewhere, defendants ROBERT CHARLES RAMIREZ and WILLIAM TROY GOINGS, a/k/a Troy Goings, knowingly executed and participated in a scheme to defraud and to obtain monies and property owned by and under the custody and control of American Sterling Bank, a financial institution insured by the Federal Deposit Insurance Corporation, in that on or about the dates listed below the defendants submitted to American Sterling Bank mortgage loan applications and supporting documentation containing material false and fraudulent pretenses, representations, and promises, including the identity of the broker and broker's company, the signature of the broker, and the credit worthiness of the loan applicants, and false and fraudulent credit reports, all to obtain loans in the approximate amounts listed to purchase and refinance mortgage loans on the listed properties, which loans were made by American Sterling Bank in reliance on the false and fraudulent material pretenses, representations, and promises by defendants in execution of such scheme:

Count	Date	Loans and Properties
2	10/11/06	Two loans in the amounts of \$764,000 and \$162,000 for D.J.G. to refinance two loans on the property at 2750 Saint Andrews Drive, Brentwood, California
3	10/18/06	One loan in the amount of \$300,000 for G.J. to purchase 5408 E. Dakota, Fresno, California
4	10/19/06	Two loans in the amounts of \$196,000 and \$36,750 for T.T. to refinance two loans on the property at 5793 Muldrow Road, Sacramento, California
5	10/19/06	Two loans in the amount of \$248,000 and \$62,000 for A.S. to refinance two loans on the property at 6840 Blue Duck Way, Sacramento, California
6	10/31/06	Two loans in the amounts of \$388,000 and \$97,000 for E.P. to purchase 17 Lily Pond Court, Sacramento, California

Count	Date	Loans and Properties
7	11/3/06	Two loans in the amounts of \$267,200 and \$66,800 for C.D. to purchase 6748 Hedgewood Drive, Sacramento, California
8	11/13/06	One loan in the amount of \$199,600 for C.G. to refinance one loan on the property at 2170 51st Avenue, Sacramento, California
9	11/13/06	One loan in the amount of \$220,000 for J.G. to refinance one loan on the property at 3412 N. Fourth Street, Fresno, California
10	11/16/06	One loan in the amount of \$570,000 for A.R. to refinance two loans on the property at 4200 N. Montego Lane, Clovis, California
11	11/17/06	Two loans in the amounts of \$264,000 and \$49,500 for L.A.M. to refinance one loan on the property at 1995 Bass Lake Avenue, Tulare, California
12	11/21/06	Two loans in the amounts of \$907,000 and \$130,000 for E.O. to refinance two loans on the property at 413 Roundhill Drive, Brentwood, California
13	11/24/06	One loan in the amount of \$288,000 for R.L. to refinance one loan on the property at 6668 N. West Avenue, Fresno, California
14	11/24/06	Two loans in the amounts of \$516,000 and \$64,500 for J.G. to refinance two loans on the property at 1604 W. Fir Avenue, Lompoc, California
15	11/30/06	Two loans in the amounts of \$306,400 and \$57,450 for M.A. to refinance two loans on the property at 10 Shari Lane, Chico, California
16	12/05/06	Two loans in the amounts of \$292,000 and \$54,750 for R.W. to refinance one loan on the property at 703 N. Demaree Street, Visalia, California
17	12/21/06	Two loans in the amounts of \$752,000 and \$94,000 for V.M. to refinance two loans on the property at 369 Sycamore Cottage Court, Camarillo, California
18	12/27/06	One loan in the amount of \$496,000 for G.L. to refinance two loans on the property at 1270 Holly Avenue, Oxnard, California

Count	Date	Loans and Properties
19	12/28/06	One loan in the amount of \$470,900 for E.B. to refinance one loan on the property at 2304 Hillard Circle, Antioch, California
20	12/28/06	One loan in the amount of \$272,000 for L.L. to refinance two loans on the property at 2735 Norbert Way, Sacramento, California

All in violation of Title 18, United States Code, Sections 1344 and 2.

A TRUE BILL.

1/10/12
DATE

/s/ Albert J. Byrd
FOREPERSON OF THE GRAND JURY

/s/ Linda Parker Marshall
Linda Parker Marshall
Senior Litigation Counsel
United States Attorneys Office

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MISSOURI

CRIMINAL CASE COVER SHEET

Division of Filing

- Western
- Central
- Southwestern

Place of Offense

St. Joseph Jackson
Southern County

Matter to be Sealed

- Secret Indictment
- Juvenile

Defendant Information

Defendant Name ROBERT CHARLES RAMIREZ
Alias Name _____
Birthdate 10/13/1974

Related Case Information

Superseding Indictment/Information Yes No
if yes, original case number 11-00261-01-CR-W-GAF

New Defendant Yes No

Prior Complaint Case Number, if any _____

U.S. Attorney Information

AUSA Linda Parker Marshall

Interpreter Needed

- Yes Language and/or dialect _____
- No

Location Status

Arrest Date _____

- Currently in Federal Custody
- Currently in State Custody Writ Required Yes No
- Currently on bond

U.S.C. Citations

Total # of Counts 20

Set	Index Key/Code/Offense Level	Description of Offense Charged	Count(s)
1	18:1349.F/4700/4	Attempt and Conspiracy to commit Fraud	1
2	18:1344A.F/4601/4	Bank Fraud	2-20
3			

Date 1/10/12 Signature of AUSA /s/ Linda Parker Marshall

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MISSOURI

CRIMINAL CASE COVER SHEET

Division of Filing

- Western
- Central
- Southwestern

Place of Offense

St. Joseph Jackson
Southern County

Matter to be Sealed

- Secret Indictment
- Juvenile

Defendant Information

Defendant Name WILLIAM TROY GOINGS
Alias Name Troy Goings
Birthdate 07/24/1975

Related Case Information

Superseding Indictment/Information Yes No
if yes, original case number 11-00261-02-CR-W-GAF

New Defendant Yes No

Prior Complaint Case Number, if any _____

U.S. Attorney Information

AUSA Linda Parker Marshall

Interpreter Needed

- Yes Language and/or dialect _____
- No

Location Status

Arrest Date _____

- Currently in Federal Custody
- Currently in State Custody Writ Required Yes No
- Currently on bond

U.S.C. Citations

Total # of Counts 20

Set	Index Key/Code/Offense Level	Description of Offense Charged	Count(s)
1	18:1349.F/4700/4	Attempt and Conspiracy to commit Fraud	1
2	18:1344A.F/4601/4	Bank Fraud	2-20
3			

Date 1/10/12 Signature of AUSA /s/ Linda Parker Marshall