

made to the borrower for purchasing the property, distribution of the loan proceeds, the identity of the borrower, and the borrower's financial condition, assets, and liabilities, which information was material to Provident Funding's approval, terms, and funding of loans. This information was contained in loan and title documents, including HUD-1 settlement statements, title commitments, loan applications, and real estate contracts.

2. Beginning in or about September 2008, and continuing until in or about March 2009, in the Northern District of Illinois, Eastern Division, and elsewhere,

DAVID GUEL,
MARY GLEASON,
HARVEY WRIGHT,
PRECIOUS HOUSE,
AZEEM SYED,
MONTY SAIYED, and
SAGED ANSARI,

defendants herein, devised, intended to devise, and participated in a scheme to defraud and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, and by concealment of material facts, which scheme is further described below, and in furtherance thereof used interstate wire transmissions.

3. It was part of the scheme that defendants DAVID GUEL, MARY GLEASON, HARVEY WRIGHT, PRECIOUS HOUSE, AZEEM SYED, MONTY SAIYED, and SAGED ANSARI, and others, caused to be funded mortgage loans in excess of \$500,000 from lenders, including Provident Funding, for the sale of properties, including 4823 S. Racine Avenue, Chicago, Illinois, and 6738 S. Marshfield Avenue, Chicago, Illinois, by making and causing to be made materially false and fraudulent

representations in documents submitted to lenders, including HUD-1 settlement statements, title commitments, loan applications, and real estate contracts concerning, among other things, the sales prices of the properties, the sales history of the properties, the buyers' down payments, the sellers' proceeds, the true disbursement of the loan proceeds at closing, the identity of the buyers, and the buyers' assets, employment, income, and intention to reside in the property.

4. It was further part of the scheme that defendants DAVID GUEL, MARY GLEASON, HARVEY WRIGHT, PRECIOUS HOUSE, AZEEM SYED, MONTY SAIYED, and SAGED ANSARI used straw buyers to conduct the scheme, who at times were buyers who had no intention of residing in the property and making mortgage payments, and at other times were using stolen identities of individuals who did not know that their identities were being used to purchase the property.

5. It was further part of the scheme that defendants DAVID GUEL, MARY GLEASON, HARVEY WRIGHT, and PRECIOUS HOUSE orchestrated and conducted "double closings" at Worldwide Title, whereby a single property was sold twice, in the following manner: (1) a short sale of the property from the owner (A), whose outstanding mortgage on the property was settled, to a buyer (B) who only temporarily took ownership of the property; and immediately thereafter (2) a resale of the property to another buyer (C) at a fraudulently inflated sales price using a mortgage loan to finance the purchase of the property.

6. It was further part of the scheme that defendants DAVID GUEL, MARY

GLEASON, HARVEY WRIGHT, and PRECIOUS HOUSE, by conducting fraudulent double closings at Worldwide Title, maximized their profits in these transactions by eliminating any outstanding mortgage on a property through the short-sale (A-to-B) transaction, and by reselling the property (B-to-C) at a fraudulently inflated sales price financed by a fraudulently obtained mortgage loan, which loan proceeds were then available for distribution to themselves and others at closings at Worldwide Title.

7. It was further part of the scheme that defendants DAVID GUEL, MARY GLEASON, HARVEY WRIGHT, and PRECIOUS HOUSE obtained and caused to be obtained funds known as “hard-money loans” or “dough for a day” to temporarily fund the purchase of the property in the short-sale (A-to-B) transaction and also to finance the borrower’s down payment in the subsequent (B-to-C) sale of the property, all of which were repaid by using the proceeds of the mortgage loan obtained from the lender and the existence of which was concealed from the lender.

8. It was further part of the scheme that defendant PRECIOUS HOUSE facilitated double closings at Worldwide Title by recruiting individuals to pose as the B and C buyers and by arranging for the buyers’ fraudulent use of stolen identities in connection with the transactions.

9. It was further part of the scheme that, at the request of defendant PRECIOUS HOUSE, defendants AZEEM SYED, MONTY SAIYED, and SAGED ANSARI obtained and caused to be obtained stolen identities for the C buyers where the true owner of the identities did not know that their personal information was being used to purchase a

property.

10. It was further part of the scheme that, at the request of defendant PRECIOUS HOUSE, defendants AZEEM SYED, MONTY SAIYED, and SAGED ANSARI prepared and caused to be prepared false and fraudulent mortgage loan applications and supporting documents for the stolen identities, including false information about the identity of the buyer, and the buyer's assets, employment, income, and intention to reside in the property.

11. It was further part of the scheme that defendants AZEEM SYED, MONTY SAIYED, and SAGED ANSARI provided and caused to be provided the stolen identities and the false and fraudulent mortgage loan information to defendant PRECIOUS HOUSE, so that the identities could be used to buy properties in double closings at Worldwide Title.

12. It was further part of the scheme that defendants DAVID GUEL, MARY GLEASON, HARVEY WRIGHT, and PRECIOUS HOUSE prepared and caused to be prepared and submitted to lenders HUD-1 settlement statements that defendants knew contained false and fraudulent representations, including false and fraudulent information about the sales prices of the properties, the source of the borrower's down payment, the seller's proceeds, and the disbursement of the loan proceeds at closings, including the disbursement of loan proceeds to themselves for their own personal benefit.

13. It was further part of the scheme that defendants DAVID GUEL, MARY GLEASON, and HARVEY WRIGHT knowingly prepared and caused to be prepared fraudulent trust documents, title commitments, and other documents that defendants knew falsely stated that the property had been transferred into a trust approximately one year

before the double closing in order to conceal from the lender that the property was being sold twice and, at times, on the same day.

14. It was further part of the scheme that defendants DAVID GUEL, MARY GLEASON, HARVEY WRIGHT, and PRECIOUS HOUSE knowingly concealed from the lenders on HUD-1 settlement statements and other documents that they were conducting double closings, the double closings involved selling the properties to straw buyers, the loan proceeds were used to fund the short-sale (A-to-B) transaction and the borrower's down payment in the subsequent (B-to-C) transaction, and a portion of the loan proceeds was being used for their own personal benefit.

15. It was further part of the scheme that defendants DAVID GUEL, MARY GLEASON, HARVEY WRIGHT, and PRECIOUS HOUSE fraudulently obtained funds for their own personal benefit from the proceeds of the mortgage loans for conducting double closings and providing hard-money loans.

16. It was further part of the scheme that defendants DAVID GUEL and PRECIOUS HOUSE used mortgage-loan proceeds to pay individuals that provided the hard-money loans for the double closings at Worldwide Title.

17. It was further part of the scheme that defendant PRECIOUS HOUSE used mortgage-loan proceeds and intended to use mortgage-loan proceeds to pay defendants AZEEM SYED, MONTY SAIYED, SAGED ANSARI, and others, for their role in recruiting buyers and supplying stolen identities and fraudulent documents for the transactions.

18. It was further part of the scheme that defendants DAVID GUEL, MARY GLEASON, HARVEY WRIGHT, PRECIOUS HOUSE, AZEEM SYED, MONTY SAIYED, and SAGED ANSARI did misrepresent, conceal, and hide, and caused to be misrepresented, concealed, and hidden, acts done in furtherance of the scheme and the purpose of those acts.

19. On or about November 28, 2008, at Downers Grove, in the Northern District of Illinois, Eastern Division, and elsewhere,

DAVID GUEL,
MARY GLEASON,
HARVEY WRIGHT,
PRECIOUS HOUSE,
AZEEM SYED,
MONTY SAIYED, and
SAGED ANSARI,

defendants herein, for the purpose of executing the scheme to defraud, knowingly caused to be transmitted by means of wire communication in interstate commerce, certain writings, signs, and signals, namely, an interstate wire transfer processed through the Federal Reserve System in New Jersey in the amount of approximately \$289,590 from a Provident Funding account at UBS Warburg Real Estate Securities to a Worldwide Title account at First Chicago Bank, which funds represented the proceeds of a mortgage loan from Provident Funding to finance the purported purchase of 4823 S. Racine by a straw buyer;

In violation of Title 18, United States Code, Section 1343.

COUNT TWO

The SPECIAL MARCH 2013 GRAND JURY further charges:

1. The allegations in paragraphs 1 through 18 of Count One of this indictment are incorporated here.
2. On or about January 12, 2009, at Downers Grove, in the Northern District of Illinois, Eastern Division, and elsewhere,

DAVID GUEL,
MARY GLEASON,
HARVEY WRIGHT,
PRECIOUS HOUSE,
AZEEM SYED,
MONTY SAIYED, and
SAGED ANSARI,

defendants herein, for the purpose of executing the scheme to defraud, knowingly caused to be transmitted by means of wire communication in interstate commerce, certain writings, signs, and signals, namely, an interstate wire transfer processed through the Federal Reserve System in New Jersey in the amount of approximately \$277,729 from a Provident Funding account at UBS Warburg Real Estate Securities to a Worldwide Title account at First Chicago Bank, which funds represented the proceeds of a mortgage loan from Provident Funding to finance the purported purchase of 6738 S. Marshfield by a straw buyer;

In violation of Title 18, United States Code, Section 1343.

COUNT THREE

The SPECIAL MARCH 2013 GRAND JURY further charges:

On or about November 28, 2008, at Downers Grove, in the Northern District of Illinois, Eastern Division, and elsewhere,

PRECIOUS HOUSE,
AZEEM SYED,
MONTY SAIYED, and
SAGED ANSARI,

defendants herein, knowingly transferred, possessed and used without lawful authority, a means of identification of another person, namely the name, social security number, and date of birth of another person, in order to obtain a mortgage loan to finance the purchase of 4823 S. Racine Avenue, Chicago, Illinois, with the intent to commit, to aid and abet, and in connection with an unlawful activity that constitutes a violation of federal law, namely Title 18, United States Code, Section 1343, as alleged in Count One of this indictment;

In violation of Title 18, United States Code, Section 1028(a)(7).

FORFEITURE ALLEGATION ONE

The SPECIAL MARCH 2013 GRAND JURY further alleges:

1. The allegations of Counts One and Two are incorporated here for the purpose of alleging forfeiture to the United States pursuant to Title 28, United States Code, Section 2461(c) and Title 18, United States Code, Section 981(a)(1)(C).

2. As a result of the violations as alleged in Counts One and Two of the foregoing indictment,

DAVID GUEL,
MARY GLEASON,
HARVEY WRIGHT,
PRECIOUS HOUSE,
AZEEM SYED,
MONTY SAIYED, and
SAGED ANSARI,

defendants herein, shall forfeit to the United States any and all right, title, and interest they may have in any property, real and personal, which constitutes and is derived from proceeds traceable to the offenses charged in Counts One and Two.

3. The interests of defendants subject to forfeiture to the United States pursuant to Title 18, United States Code, Section 981(a)(1)(C) as incorporated by Title 28, United States Code, Section 2461(c), include but are not limited to approximately \$567,320.

4. If any of the forfeitable property described above, as a result of any act or omission by defendants:

- (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 divided without difficulty;

the United States of America shall be entitled to forfeiture of substitute property pursuant to the provisions of Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c);

All pursuant to Title 28, United States Code, Section 2461(c) and Title 18, United States Code, Section 981(a)(1)(C).

FORFEITURE ALLEGATION TWO

The SPECIAL MARCH 2013 GRAND JURY further alleges:

1. The allegations of Count Three are incorporated here for the purpose of alleging forfeiture to the United States pursuant to Title 18, United States Code, Section 982(a)(2)(B).

2. As a result of the violation as alleged in Count Three of the foregoing indictment,

PRECIOUS HOUSE,
AZEEM SYED,
MONTY SAIYED, and
SAGED ANSARI,

defendants herein, shall forfeit to the United States any and all right, title, and interest they may have in any property, real and personal, which constitutes and is derived from proceeds traceable to the offense charged in Count Three.

3. The interests of defendants subject to forfeiture to the United States pursuant to Title 18, United States Code, Section 982(a)(2)(B), include but are not limited to approximately \$261,500.

4. If any of the forfeitable property described above, as a result of any act or omission by defendants:

- (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 divided without difficulty;

the United States of America shall be entitled to forfeiture of substitute property pursuant to the provisions of Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(a)(2)(B);

All pursuant to Title 18, United States Code, Section 982(a)(2)(B).

A TRUE BILL:

FOREPERSON

UNITED STATES ATTORNEY