

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA : **CRIMINAL NO. 10-**_____

v. : **DATE FILED:** _____

JOSE MONCADA : **VIOLATION:**
18 U.S.C. § 1341 (mail fraud - 1 count)

I N F O R M A T I O N

COUNT ONE

THE UNITED STATES ATTORNEY CHARGES THAT:

The Defendant

At all times material to this information:

1. Defendant JOSE MONCADA owned and operated a tax preparation business, S&S Income Tax Preparation, in Willingboro, New Jersey.

The Scheme

2. From at least in or about 2008, through in or about 2009, defendant

JOSE MONCADA

devised and intended to devise a scheme to defraud lenders and to obtain money and property by means of false and fraudulent pretenses, representations and promises.

MANNER AND MEANS

It was part of the scheme that:

3. Defendant JOSE MONCADA prepared false tax returns knowing that the false tax returns were to be submitted to mortgage lenders in support of mortgage applications.

4. In or about April 2008, defendant JOSE MONCADA prepared a false tax return for Henry Ruby, charged elsewhere, and gave the false tax return to Ruby, knowing that

Ruby intended to submit the false tax return to a lender in support of an application for a mortgage loan modification and which Ruby submitted to a lender in support of a mortgage loan modification for property on Bayview Road, in Betterton, Maryland.

5. From in or about May 2008, to in or about July 2008, during an undercover operation in which undercover agents posed as a seller and a purchaser of real estate, defendant JOSE MONCADA prepared false tax returns for “J.L.” Defendant MONCADA directed that the false tax returns be filed with the Internal Revenue Service (“IRS”), knowing that “J.L.” intended to submit the filed false tax returns to a lender in support of a mortgage application for the purchase of property on Dorel Street, in Philadelphia, Pennsylvania.

6. From in or about May 2008, to in or about July 2008, during an undercover operation in which undercover agents posed as a seller and a purchaser of real estate, defendant JOSE MONCADA prepared false tax returns for “G.D.” Defendant MONCADA directed that the false tax returns be filed with the IRS, knowing that “G.D.” intended to submit the filed false tax returns to a lender in support of a mortgage application for the purchase of property on Stenton Avenue, in Philadelphia, Pennsylvania.

7. In or about February 2009, defendant JOSE MONCADA prepared a false tax return for “R.R.” and gave the false tax return to Henry Ruby, knowing that Ruby and “R.R.” intended to submit the false tax return to a lender in support of an application for a mortgage loan modification for property on Stonebridge Drive, in Lumberton, New Jersey.

8. On or about July 7, 2008, in the Eastern District of Pennsylvania, and elsewhere, defendant

JOSE MONCADA,

for the purpose of executing the scheme described above, and attempting to do so, knowingly caused to be delivered by United States mail the false tax returns of “J.L.” and “G.D.” from Philadelphia, Pennsylvania, to Kansas, Missouri, for filing at the IRS Center.

All in violation of Title 18, United States Code, Section 1341.

ZANE DAVID MEMEGER
United States Attorney