

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
11-80007-CR-MARRA/HOPKINS
CASE NO. _____

18 U.S.C. § 1349
18 U.S.C. § 1341
18 U.S.C. §§ 1028 and 1028A
18 U.S.C. §§ 1956(a)(3)(B) and (h)
18 U.S.C. § 2

UNITED STATES OF AMERICA,

Plaintiff,

vs.

**FRANCIS SANTA,
DAVID L. MCGUIRE,
WILLIAM J. HEBERT,
DAVID J. RAMOY,
ALEXANDER R. REYES,
DANIEL AGUDELO,
ANTONIO MANNARINO,
ANTHONY DEPIERRO,
TERRANCE T. WARD,
JEANNE WARD, and
DEREK L. NADLER,**

Defendants.

_____ /

INFORMATION

The United States Attorney charges that:

GENERAL ALLEGATIONS

At all times relevant to this Information:

1. Palm Beach Business Consultants, Inc. ("PBBC") was a business incorporated in the state

of Florida and located in Boca Raton, Florida. PBBC provided assistance to businesses and individuals seeking personal and business loans and lines of credit.

2. Wachovia Bank, N.A. (now known as Wells Fargo Bank, N.A.), Fifth Third Bank, Regions Bank, HSBC Bank U.S.A., N.A., Bank of America, N.A., Floridian Community Bank, SunTrust Bank, Commerce Bank (now known as T.D. Bank N.A.), and National City Bank (now known as PNC Bank) were financial institutions whose accounts were insured by the Federal Deposit Insurance Corporation. These financial institutions provided personal and business lines of credit to qualified borrowers.

3. American Brokers Conduit was a lending institution based in Dallas, Texas, and provided, among other products, mortgage loans.

4. Defendant **FRANCIS SANTA** was the true owner of PBBC. Defendant **SANTA** directed PBBC's day-to-day operations and controlled its finances.

5. Defendants **DAVID L. MCGUIRE**, **WILLIAM J. HEBERT**, **DAVID J. RAMOY**, **ALEXANDER R. REYES**, and **DANIEL AGUDELO** were loan officers responsible for processing applications for loans and lines of credit from borrowers. At various times, defendant **MCGUIRE** was employed at Wachovia Bank, defendant **HEBERT** was employed at HSBC Bank, defendants **REYES** and **AGUDELO** were employed at Fifth Third Bank, and defendant **RAMOY** was employed at Floridian Community Bank.

6. Defendants **ANTONIO MANNARINO**, **ANTHONY DEPIERRO**, and **TERRANCE T. WARD**, were business owners who sought assistance from PBBC with obtaining lines of credit. Defendant **JEANNE WARD**, who was the wife of defendant **TERRANCE T. WARD** and an investigative aide at the Broward County Sheriff's Office, also sought help from PBBC with

obtaining lines of credit. As an investigative aide at Broward County Sheriff's Office, defendant **JEANNE WARD** had access to the Florida Driver and Vehicle Identification Database (known as DAVID), which contained personal information about all licensed drivers in the State of Florida.

7. Defendant **DEREK L. NADLER** was a friend of defendant **MANNARINO's** and agreed to let his name be used on several lines of credit obtained by PBBC for **MANNARINO**.

COUNT 1
(Conspiracy to Commit Bank Fraud: 18 U.S.C. § 1349)

8. Paragraphs 1 - 2, and 4 - 7 of the General Allegations section of this Information are realleged and incorporated as though fully set forth herein.

9. From in or about September 2005, and continuing through in or about June 2010, at Palm Beach County, in the Southern District of Florida, and elsewhere, the defendants,

**FRANCIS SANTA,
DAVID L. MCGUIRE,
WILLIAM J. HEBERT,
DAVID J. RAMOY,
ALEXANDER R. REYES,
DANIEL AGUDELO,
ANTONIO MANNARINO,
ANTHONY DEPIERRO,
TERRANCE T. WARD,
JEANNE WARD, and
DEREK L. NADLER,**

did knowingly and willfully combine, conspire, confederate, and agree with each other and with others known and unknown to the United States Attorney, to execute, and cause the execution of, a scheme and artifice to defraud financial institutions, that is, Wachovia Bank, Fifth Third Bank, Regions Bank, HSBC Bank, Bank of America, Floridian Community Bank, SunTrust Bank, Commerce Bank, and National City Bank, and to obtain any of the moneys, funds, assets and other property owned by and under the custody and control of said financial institution, by means of

materially false and fraudulent pretenses, representations, and promises, in violation of Title 18, United States Code, Sections 1344 and 2.

PURPOSE OF THE CONSPIRACY

10. It was the purpose and object of the conspiracy for the defendants and their co-conspirators to unlawfully enrich themselves by (a) preparing and submitting to financial institutions false and fraudulent loan and line of credit applications, and supporting financial documents, on behalf of PBBC borrowers, (b) paying kickbacks to bank officers in order to facilitate the processing and approval of the fraudulent loans and lines of credit, and (c) collecting substantial fees from the PBBC borrowers in return for these services and distributing the fees among the defendants and their co-conspirators.

MANNER AND MEANS OF THE CONSPIRACY

The manner and means by which the defendants and their co-conspirators sought to accomplish the objects and purpose of the conspiracy included, but were not limited to, the following:

11. **SANTA** established PBBC to assist businesses and individuals with obtaining personal and business loans and lines of credit. To induce clients to use PBBC's services, **SANTA** represented that he had connections with numerous bankers who would assist him in getting PBBC clients up to \$300,000 in loans and/or lines of credit. To take advantage of PBBC's services, the clients, including **MANNARINO**, **DEPIERRO**, and the **WARDS** were required to pay **SANTA** a fee, typically ranging from \$12,500 to \$25,000, which was paid up front or after the loan or line of credit was funded by the bank.

12. Most of the clients who sought assistance from PBBC lacked the income, credit scores,

and/or collateral to qualify for legitimate loans or lines of credit. **SANTA** promised these clients that he could obtain loans and/or lines of credit for them by manipulating the financial information submitted to the bank to make it appear as if the clients were qualified, when in fact they were not.

13. **SANTA** hired several employees who were responsible for preparing the fraudulent loan and credit packages for PBBC clients. These co-conspirators routinely prepared fraudulent applications in which they falsely reported the clients' income. In many instances, the co-conspirators included false and fraudulent financial documents, that is, false tax returns, false pay stubs, false balance sheets and false income statements, in the fraudulent loan and credit packages.

14. In most instances, the fraudulent loan and line of credit applications were in the name of the client or the client's business. However, if the client had a friend or relative with good credit or available collateral, the PBBC employee would sometimes use the name of the friend or relative or a business owned by the friend or relative on the fraudulent application. In several instances, this was done without the knowledge or consent of the friend or relative. On other occasions, **SANTA** would arrange to have an inactive corporation which had been in existence for several years placed in the name of the client and used on the fraudulent application. **SANTA** claimed that banks preferred to lend money to "seasoned" corporations rather than new ones.

15. **SANTA** directed his co-conspirators to submit the fraudulent loan and credit applications to collusive bank officers, including **MCGUIRE, HEBERT, REYES, RAMOY** and **DANIEL AGUDELO**. These bank officers agreed to facilitate the processing of the fraudulent loan and line of credit applications for **SANTA** in return for a kickback – typically cash, an American Express gift card or other means of remuneration.

16. In most instances, the fraudulent loan and line of credit applications were approved by

the bank. The clients would then take possession of the loan proceeds and withdraw funds against the lines of credit. In most instances, the clients were not able to repay the loans and/or lines of credit, which resulted in substantial losses to the banks.

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

COUNT 2
(Mail Fraud: 18 USC §§ 1341 and 2)

17. Paragraphs 2, 3, and 7 of the General Allegations section are realleged and incorporated as though fully set forth herein.

18. From in or about March 1, 2007, and continuing through in or about April 16, 2007, in Palm Beach County, in the Southern District of Florida, and elsewhere, the defendants,

**ANTONIO MANNARINO, and
DEREK L. NADLER,**

did knowingly and willfully devise and intend to devise a scheme and artifice to defraud and to obtain money and property from American Brokers Conduit and National City Bank, by means of materially false and fraudulent pretenses, representations and promises, knowing that the pretenses, representations and promises were false and fraudulent when made, and for the purpose of executing such scheme and artifice to defraud and attempting to do so, did knowingly cause certain mail matter to be delivered by the United States Postal Service, according to the directions thereon.

PURPOSE OF THE SCHEME AND ARTIFICE TO DEFRAUD

19. It was the purpose of the scheme and artifice to defraud for the defendants to unlawfully enrich themselves by obtaining mortgage loans for more than \$1 million based on false and fraudulent financial information.

MANNER AND MEANS OF THE SCHEME AND ARTIFICE TO DEFRAUD

The manner and means by which the defendants sought to accomplish the object of the scheme and artifice to defraud included, among others, the following:

20. **MANNARINO** solicited **NADLER** to participate in a sham sale of **MANNARINO**'s residence for \$1.2 million. **MANNARINO** orchestrated the sale in order to obtain funds to pay-off his original mortgage on the residence and to use for his own benefit.

21. To accomplish the sham sale, **MANNARINO** caused to be submitted fraudulent mortgage applications in **NADLER**'s name seeking more than \$1 million in loan proceeds from American Brokers Conduit and National City Bank. Because **NADLER** could not qualify for such large loans, the mortgage applications falsely represented **NADLER**'s income and assets.

22. **NADLER** signed the fraudulent mortgage applications knowing that they contained false financial information.

23. Based on the false mortgage applications, the lenders disbursed \$1,160,000 in loan proceeds, which **MANNARINO** used to pay-off his first mortgage and to benefit himself and **NADLER**.

24. After the purported sale of the residence, **MANNARINO** continued to make mortgage payments on the residence for a short period of time. After that, the property was foreclosed on, resulting in substantial losses to both lenders.

USE OF THE MAILS

25. On or about April 16, 2007, in the Southern District of Florida, and elsewhere, for the purpose of executing the above scheme and artifice to defraud and to obtain money and property from American Brokers Conduit and National City Bank by means of materially false and fraudulent

pretenses, representations and promises, the defendants,

**ANTONIO MANNARIONO, and
DEREK L. NADLER,**

did knowingly cause to be delivered by a commercial interstate carrier, that is, United Parcel Service, according to the address thereon, a check for \$526,737.29 issued by Complete Title Solutions, Inc., to GMAC Mortgage Corporation, Louisville, Kentucky.

All in violation of Title 18, United States Code, Sections 1341 and 2.

COUNT 3
(Conspiracy to Launder Money: 18 U.S.C. § 1956(h))

26. From in or about April 2010, and continuing through in or about June 2010, in Palm Beach County, in the Southern District of Florida, and elsewhere, the defendant,

DAVID L. MCGUIRE,

did knowingly and willfully combine, conspire, confederate, and agree with others known and unknown to the United States Attorney, to knowingly conduct and attempt to conduct financial transactions affecting interstate or foreign commerce involving property represented by a law enforcement officer to be proceeds of a specified unlawful activity, that is, illegal narcotics trafficking, in violation of the laws of the United States, with the intent to conceal and disguise the nature, location, source, ownership and control of property believed to be the proceeds of specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(3)(B), all in violation of Title 18, United States Code, Section 1956(h).

COUNT 4
(Conspiracy to Launder Money: 18 USC § 1956(h))

27. From at least as early as March 8, 2010, and continuing through approximately May 17, 2010, the exact dates being unknown to the United States Attorney, in Palm Beach County, in the

Southern District of Florida, and elsewhere, the defendants,

**WILLIAM J. HEBERT JR., and
DAVID J. RAMOY,**

did knowingly and willfully combine, conspire, confederate and agree with each other and with others known and unknown to the United States Attorney to knowingly conduct and attempt to conduct financial transactions affecting interstate and foreign commerce involving property represented by a law enforcement officer to be the proceeds of a specified unlawful activity, that is, illegal narcotics trafficking, with the intent to conceal and disguise the nature, location, source, ownership and control of the property believed to be the proceeds of a specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(3)(B).

All in violation of Title 18, United States Code, Section 1956(h).

COUNT 5
(Money Laundering Concealment: 18 USC § 1956(a)(3)(B))

28. Between on or about March 31, 2010 and April 28, 2010, in Palm Beach County, in the Southern District of Florida, and elsewhere, the defendant,

ALEXANDER R. REYES,

did knowingly conduct and attempt to conduct financial transactions affecting interstate and foreign commerce, that is, seven cash deposits totaling \$47,000, into various accounts at Fifth Third Bank, involving property represented by a law enforcement officer to be the proceeds of a specified unlawful activity, that is, illegal narcotics trafficking, with the intent to conceal and disguise the nature, location, source, ownership and control of the property believed to be the proceeds of said specified unlawful activity.

All in violation of Title 18, United States Code Sections 1956(a)(3)(B) and 2.

COUNT 6
(Money Laundering Concealment: 18 USC § 1956(a)(3)(B))

29. Between on or about May 21, 2010 and June 4, 2010, in Palm Beach County, in the Southern District of Florida, and elsewhere, the defendant,

DANIEL AGUDELO,

did knowingly conduct and attempt to conduct financial transactions affecting interstate and foreign commerce, that is, nine cash deposits totaling \$40,000 into accounts at various financial institutions, involving property represented by a law enforcement officer to be the proceeds of a specified unlawful activity, that is, illegal narcotics trafficking, with the intent to conceal and disguise the nature, location, source, ownership and control of the property believed to be the proceeds of said specified unlawful activity.

All in violation of Title 18, United States Code Sections 1956(a)(3)(B) and 2.

COUNT 7
(Aggravated Identity Theft: 18 U.S.C. §1028A(a)(1))

30. On about January 26, 2010, through on or about February 6, 2010, in Palm Beach County, in the Southern District of Florida, and elsewhere, the defendants,

JEANNE WARD, and
TERRANCE T. WARD,

during and in relation to felony violations of Title 18, United States Code, Section 1349, that is conspiracy to commit fraud on a financial institution, did knowingly transfer, possess and use without lawful authority, a means of identification of another person, that is, Florida Driver License No. Wxxx-xxx-xx-002-0, in the name TJW, and Social Security Number xxx-xx-0018, issued to TJW.

All in violation of Title 18, United States Code, Sections 1028A(a)(1) and 2.

COUNT 8
(Identity Theft: 18 U.S.C. §1028)

31. On or about January 26, 2010, in Palm Beach and Broward Counties, in the Southern District of Florida, and elsewhere, the defendants,

**JEANNE WARD, and
TERRANCE T. WARD,**

did knowingly transfer, possess and use, in or affecting interstate commerce, without lawful authority, a means of identification of another person, that is, Driver License No. Wxxx-xxx-xx-002-0, in the name TJW, date of birth, 1-2-1970, with the intent to commit, or to aid or abet the commission of an unlawful activity that constitutes a violation of federal law, that is, violations of Title 18, United States Code, Section 1349, conspiracy to commit fraud on a financial institution as set forth in Count 1.

All in violation of Title 18, United States Code, Sections 1028(a)(7), (b)(1)(A)(ii) and 2.

COUNT 9
(Identity Theft: 18 U.S.C. §1028)

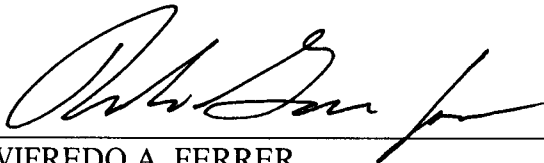
32. On or about June 8, 2010, in Palm Beach and Broward Counties, in the Southern District of Florida, and elsewhere, the defendant,

JEANNE WARD,

did knowingly transfer, possess and use, in or affecting interstate commerce, without lawful authority, a means of identification of another person, that is, Driver License No. Wxxx-xxx-xx-841-0, in the name JNW, date of birth, 9-21-1953, and Social Security Number xxx-xx-4621, with the intent to commit, or to aid or abet the commission of an unlawful activity that constitutes a violation of federal law, that is, violations of Title 18, United States Code, Section 1349, conspiracy to commit

fraud on a financial institution as set forth in Count 1.

All in violation of Title 18, United States Code, Sections 1028(a)(7), (b)(1)(A)(ii) and 2.



WIFREDO A. FERRER
UNITED STATES ATTORNEY



ELLEN L. COHEN
ASSISTANT UNITED STATES ATTORNEY



ADRIENNE RABINOWITZ
ASSISTANT UNITED STATES ATTORNEY

CASE NO.

11-80007-CR-MARRA/HOPKINS

UNITED STATES OF AMERICA

CERTIFICATE OF TRIAL ATTORNEY*

vs.

FRANCIS SANTA, DAVID L. MCGUIRE,
WILLAM J. HERBERT, DAVID J. RAMOY, ALEXANDER R. REYES,
DANIEL AGUDELO, ANTONIO MANNARINO, ANTHONY DEPIERRO,
TERRANCE T. WARD, JEANNE WARD, and DEREK L. NADLERDefendants./

Superseding Case Information:

Court Division: (Select One)

 Miami Key West
 FTL X WPB FTPNew Defendant(s) _____
Number of New Defendants _____
Total number of counts _____

Yes _____ No _____

I do hereby certify that:

1. 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.
2. 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.

3. Interpreter: (Yes or No) No
List language and/or dialect _____

4. This case will take 3 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> X </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> </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) No

If yes:

Judge: _____

Case No. _____

(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) _____

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


 ELLEN COHEN
 ASSISTANT UNITED STATES ATTORNEY
 Florida Bar No.: 0739472

*Penalty Sheet(s) attached

R E V
4/8/08

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: FRANCIS SANTA

Case No: 11-80007-CR-MARRA/HOPKINS

Count #: 1

Conspiracy to Commit Fraud on a Financial Institution

18 U.S.C §1349

* Max. Penalty up to 30 years incarceration, \$1,000,000 fine and up to 5 years supervised release.

***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: DAVID MCGUIRE

Case No: 11-80007-CR-MARRA/HOPKINS

Count #: 1

Conspiracy to Commit Fraud on a Financial Institution

18 U.S.C §1349

* Max.Penalty up to 30 years incarceration, \$1,000,000 fine and up to 5 years supervised release.

Count #: 3

Conspiracy to Commit Money Laundering

18 U.S.C § 1956(h)

* Max.Penalty up to 20 years incarceration, \$250,000 fine and up to 3 years supervised release.

***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: WILLIAM J. HEBERT

Case No: 11-80007 CR- MARRA/ HOPKINS

Count #: 1

Conspiracy to Commit Fraud on a Financial Institution

18 U.S.C §1349

* Max. Penalty up to 30 years incarceration, \$1,000,000 fine and up to 5 years supervised release.

Count #: 4

Conspiracy to Commit Money Laundering

18 U.S.C §1956(h)

* Max. Penalty up to 20 years incarceration, \$250,000 fine and up to 3 years supervised release.

***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: DAVID J. RAMOY

Case No: 11-80007-CR-MARRA/HOPKINS

Count #: 1

Conspiracy to Commit Fraud on a Financial Institution

18 U.S.C §1349

* Max.Penalty up to 30 years incarceration, \$1,000,000 fine and up to 5 years supervised release.

Count #: 4

Conspiracy to Commit Money Laundering

18 U.S.C §1956(h)

* Max.Penalty up to 20 years incarceration, \$250,000 fine and up to 3 years supervised release.

***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: ALEXANDER R. REYES

Case No: 11-80007-CR-MARRA/HOPKINS

Count #: 1

Conspiracy to Commit Fraud on a Financial Institution

18 U.S.C §1349

* Max. Penalty up to 30 years incarceration, \$1,000,000 fine and up to 5 years supervised release.

Count #: 5

Money Laundering

18 U.S.C §1956(a)(3)(B)

* Max. Penalty up to 20 years incarceration, \$250,000 fine and up to 3 years supervised release.

***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: DANIEL AGUDELO

Case No: 11-80007-CR-MARRA/HOPKINS

Count #: 1

Conspiracy to Commit Fraud on a Financial Institution

18 U.S.C §1349

* Max.Penalty up to 30 years incarceration, \$1,000,000 fine and up to 5 years supervised release.

Count #: 6

Money Laundering

18 U.S.C §1956(a)(3)(B)

* Max.Penalty up to 20 years incarceration, \$250,000 fine and up to 3 years supervised release.

***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: ANTHONY MANNARINO

Case No: 11-80007-CR-MARBA/HOPKINS

Count #: 1

Conspiracy to Commit Fraud on a Financial Institution

18 U.S.C §1349

* Max.Penalty up to 30 years incarceration, \$1,000,000 fine and up to 5 years supervised release.

Count #: 2

Mail Fraud

18 U.S.C § 1341

* Max.Penalty up to 20 years incarceration, \$250,000 fine and up to 3 years supervised release.

***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: ANTHONY DEPIERRO

Case No: 11-80007-CR-MARKA/HOPKINS

Count #: 1

Conspiracy to Commit Fraud on a Financial Institution

18 U.S.C §1349

* Max. Penalty up to 30 years incarceration, \$1,000,000 fine and up to 5 years supervised release.

***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: TERRANCE T. WARD

Case No: 11-80007-CK-MARRA/HOPKINS

Count #: 1

Conspiracy to Commit Fraud on a Financial Institution

18 U.S.C. 1349

* Max.Penalty: Up to 30 years' imprisonment; \$1,000,000 fine; 5 years supervised release

Count #: 7

Aggravated Identity Theft

18 U.S.C. 1028A

* Max.Penalty: Up to 2 years' consecutive sentence

Count #: 8

Identity Theft

18 U.S.C. 1028(a)(7)

* Max.Penalty: Up to 15 years' imprisonment; up to \$250,000 fine; up to 3 years supervised release

***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: JEANNE WARD

Case No: 11-80007-CR-MARLA (HOPKINS)

Count #: 1

Conspiracy to Commit Fraud on a Financial Institution

18 U.S.C. 1349

*** Max.Penalty:** Up to 30 years' imprisonment; \$1,000,000 fine; 5 years supervised release

Count #: 7

Aggravated Identity Theft

18 U.S.C. 1028A

*** Max.Penalty:** Up to 2 years' consecutive sentence

Count #: 8 and 9

Identity Theft

18 U.S.C. 1028(a)(7)

*** Max.Penalty:** Up to 15 years' imprisonment; up to \$250,000 fine; up to 3 years supervised release

***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: DEREK NADLER

Case No: 11-80007-CR-MARRA HOPKINS

Count #: 1

Conspiracy to Commit Fraud on a Financial Institution

18 U.S.C §1349

* Max. Penalty up to 30 years incarceration, \$1,000,000 fine and up to 5 years supervised release.

Count #: 2

Mail Fraud

18 U.S.C § 1341

* Max. Penalty up to 20 years incarceration, \$250,000 fine and up to 3 years supervised release.

***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

CASE NUMBER: 11-80007-CR-MARRA/HOPKINS

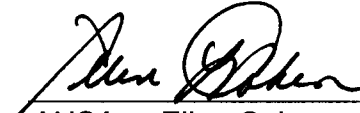
BOND RECOMMENDATION

DEFENDANT: FRANCIS SANTA

\$50,000 Personal Surety Bond

(Personal Surety) (Corporate Surety) (Cash) (Pre-Trial Detention)

By:


AUSA: Ellen Cohen

Last Known Address: _____

What Facility: _____

Agent(s):

Daniel Szczepanski, S/A

(FBI) (SECRET SERVICE) (DEA) (IRS) (ICE) (OTHER)

Federal Bureau of Investigation

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NUMBER: 11-80007-CR-MARRA/HOPKINS

BOND RECOMMENDATION

DEFENDANT: DAVID MCGUIRE

\$50,000 Personal Surety Bond

(Personal Surety) (Corporate Surety) (Cash) (Pre-Trial Detention)

By:


AUSA: Ellen Cohen

Last Known Address: _____

What Facility: _____

Agent(s): Daniel Szczepanski, S/A

(FBI) (SECRET SERVICE) (DEA) (IRS) (ICE) (OTHER)

Federal Bureau of Investigation

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NUMBER: 11-80007-CR-MARRA/HOPKINS

BOND RECOMMENDATION

DEFENDANT: WILLIAM J. HEBERT

\$50,000 Personal Surety Bond

(Personal Surety) (Corporate Surety) (Cash) (Pre-Trial Detention)

By:


AUSA: Ellen Cohen

Last Known Address: _____

What Facility: _____

Agent(s): Daniel Szczepanski, S/A

(FBI) (SECRET SERVICE) (DEA) (IRS) (ICE) (**OTHER**)

Federal Bureau of Investigation

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NUMBER: 11-80007-CR-MARRA/HOPKINS

BOND RECOMMENDATION

DEFENDANT: DAVID J. RAMOY

\$50,000 Personal Surety Bond

(Personal Surety) ~~(Corporate Surety)~~ (Cash) (Pre-Trial Detention)

By:


AUSA: Ellen Cohen

Last Known Address: _____

What Facility: _____

Agent(s):

Daniel Szczepanski, S/A

(FBI) (SECRET SERVICE) (DEA) (IRS) (ICE) (**OTHER**)

Federal Bureau of Investigation

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NUMBER: 11-80007-CR-MARZRA/HOPKINS

BOND RECOMMENDATION

DEFENDANT: ALEXANDER R. REYES

\$50,000 Personal Surety Bond

(Personal Surety) (Corporate Surety) (Cash) (Pre-Trial Detention)

By:


AUSA: Ellen Cohen

Last Known Address: _____

What Facility: _____

Agent(s): Daniel Szczepanski, S/A

(FBI) (SECRET SERVICE) (DEA) (IRS) (ICE) (OTHER)

Federal Bureau of Investigation

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NUMBER: 11-80007-CR-MARRA/HOPKINS


BOND RECOMMENDATION

DEFENDANT: DANIEL AGUDELO

\$50,000 Personal Surety Bond

(Personal Surety) (Corporate Surety) (Cash) (Pre-Trial Detention)

By:


AUSA: Ellen Cohen

Last Known Address: _____

What Facility: _____

Agent(s): Daniel Szczepanski, S/A

(FBI) (SECRET SERVICE) (DEA) (IRS) (ICE) (OTHER)

Federal Bureau of Investigation

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NUMBER: 11-80007-CR-MARRA/HOPKINS

BOND RECOMMENDATION

DEFENDANT: ANTHONY MANNARINO

\$50,000 Personal Surety Bond

(Personal Surety) (Corporate Surety) (Cash) (Pre-Trial Detention)

By:


AUSA: Ellen Cohen

Last Known Address: _____

What Facility: _____

Agent(s): Daniel Szczepanski, S/A

(FBI) (SECRET SERVICE) (DEA) (IRS) (ICE) (OTHER)

Federal Bureau of Investigation

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NUMBER: 11-80007-cr-MARLA HOPKINS

BOND RECOMMENDATION

DEFENDANT: ANTHONY DEPIERRO

\$50,000 Personal Surety Bond

(Personal Surety) (Corporate Surety) (Cash) (Pre-Trial Detention)

By:


AUSA: Ellen Cohen

Last Known Address: _____

What Facility: _____

Agent(s): Daniel Szczepanski, S/A

(FBI) (SECRET SERVICE) (DEA) (IRS) (ICE) (OTHER)

Federal Bureau of Investigation

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NUMBER: 11-80007-CR-MARZA/HOPKINS

BOND RECOMMENDATION

DEFENDANT: TERRANCE T. WARD

\$50,000 Personal Surety Bond

(Personal Surety) (Corporate Surety) (Cash) (Pre-Trial Detention)

By:


AUSA: Ellen Cohen

Last Known Address: _____

What Facility: _____

Agent(s): Daniel Szczepanski, S/A

(FBI) (SECRET SERVICE) (DEA) (IRS) (ICE) (OTHER)

Federal Bureau of Investigation

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NUMBER: 11-80007-CR-MARKA/HOPKINS

BOND RECOMMENDATION

DEFENDANT: JEANNE WARD

\$50,000 Personal Surety Bond

(Personal Surety) (Corporate Surety) (Cash) (Pre-Trial Detention)

By: _____

AUSA: Ellen Cohen

Last Known Address: _____

What Facility: _____

Agent(s):

Daniel Szczepanski, S/A

(FBI) (SECRET SERVICE) (DEA) (IRS) (ICE) (OTHER)

Federal Bureau of Investigation

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NUMBER: 11-80007-CR-MARKA/HOPKINS

BOND RECOMMENDATION

DEFENDANT: DEREK NADLER

\$50,000 Personal Surety Bond

(Personal Surety) (Corporate Surety) (Cash) (Pre-Trial Detention)

By:


AUSA: Ellen Cohen

Last Known Address: _____

What Facility: _____

Agent(s):

Daniel Szczepanski, S/A

(FBI) (SECRET SERVICE) (DEA) (IRS) (ICE) (OTHER)

Federal Bureau of Investigation