

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA)	
)	No.
vs.)	
)	Violations: Title 18, United States Code,
RICHARD LISNEK,)	Sections 1341, 1343 and 2
JUDY KIEN,)	
K & L REAL ESTATE, INC.,)	
D & J PROPERTIES II, INC.,)	
ALEX BULMASH,)	
MICHAEL BULMASH,)	
ALLEN BULMASH,)	
ANTHONY NAVICKAS,)	
INVESTMENT GROUP, INC.,)	
LYNN LISKIEWICZ,)	
LASALLE TITLE COMPANY,)	
JAMES HEILAND,)	
BRANDON BRADFORD,)	
VLAD OSTROMOGILSKY,)	
ALFREDO HILADO,)	
MARK VARGO,)	
JOANNE RUIZ,)	
KENNETH TURNER and)	
ANTOINETTE LAWS)	

COUNT ONE

The SPECIAL FEBRUARY 2008-1 GRAND JURY charges:

1. At times material to this indictment:
 - a. Defendant RICHARD LISNEK was a mortgage broker licensed in Illinois and president of:
 - i. defendant K&L REAL ESTATE, INC. (K&L REAL ESTATE), a real estate investment company; and
 - ii. American Eagle Mortgage, Inc. (American Eagle Mortgage), a mortgage brokerage company, both with offices at 3417 North Kennicott,

Arlington Heights, Illinois;

b. Defendant JUDY KIEN was an attorney licensed in Illinois, the agent for K&L Real Estate, and president of defendant D&J PROPERTIES II, INC. (D&J PROPERTIES), a real estate investment company with an office at 3417 North Kennicott, Arlington Heights;

c. Defendant ALEX BULMASH was a mortgage broker licensed in Illinois and president and secretary of defendant INVESTMENT GROUP, INC., doing business as Investment Mortgage Group (INVESTMENT MORTGAGE GROUP), a mortgage brokerage company with offices at 7360 N. Lincoln Avenue, Suite 100, Lincolnwood, and 5266 West Lincoln Avenue, Skokie, Illinois;

d. Defendant MICHAEL BULMASH was a loan originator licensed in Illinois and employed at IMG;

e. Defendants ALLEN BULMASH and ANTHONY NAVICKAS were employed at IMG as loan processors;

f. Defendant LYNN LISKIEWICZ was vice-president and regional manager of defendant LASALLE TITLE COMPANY (LASALLE TITLE), a certified registered title insurance agent in Illinois, with an office at 100 North LaSalle, Chicago, Illinois;

g. Defendants JAMES HEILAND, BRANDON BRADFORD and VLAD OSTROMOGILSKY were real estate appraisers licensed in Illinois;

h. GMAC Bank was a financial institution the deposits of which were insured by the Federal Deposit Insurance Corporation;

- i. GMAC Bank, Long Beach Mortgage Co., Countrywide Home Loans Inc., Homecomings Financial Network Inc., IMPAC Lending Group d.b.a. Impact Funding Corporation (IMPAC Funding), Paragon Home Lending LLC, Taylor, Bean & Whitaker Mortgage Corp., American Home Mortgage Acceptance Inc., and American Home Mortgage Corp., d.b.a. American Brokers Conduit were lenders which made loans secured by mortgages (mortgage loans); and
- j. Lenders required applicants for mortgage loans to provide truthful information, including the borrower's employment, financial condition, contribution to the purchase price and intention to occupy the property purchased, and the sales price, value and condition of the property, which was material to the approval, terms and funding of the loan.

2. Beginning in or about 2002, and continuing until in or about 2007, in the Northern District of Illinois, Eastern Division, and elsewhere,

RICHARD LISNEK,
JUDY KIEN,
K & L REAL ESTATE, INC.,
D & J PROPERTIES II, INC.,
ALEX BULMASH,
MICHAEL BULMASH,
ALLEN BULMASH,
ANTHONY NAVICKAS,
INVESTMENT GROUP, INC.,
LYNN LISKIEWICZ,
LASALLE TITLE COMPANY,
JAMES HEILAND,
BRANDON BRADFORD,
VLAD OSTROMOGILSKY,
ALFREDO HILADO,
MARK VARGO,
JOANNE RUIZ,
KENNETH TURNER and
ANTOINETTE LAWS,

defendants herein, along with others known and unknown to the Grand Jury, devised and participated in a scheme to defraud and to obtain money and property from lenders by means of materially false and fraudulent pretenses, representations, and promises, and material omissions, which scheme affected a financial institution, and which is further described below.

3. It was part of the scheme that defendants RICHARD LISNEK, JUDY KIEN, K&L REAL ESTATE, D & J PROPERTIES, ALEX BULMASH, MICHAEL BULMASH, ALLEN BULMASH, ANTHONY NAVICKAS, INVESTMENT MORTGAGE GROUP, LYNN LISKIEWICZ, LASALLE TITLE, JAMES HEILAND, BRANDON BRADFORD, VLAD OSTROMOGILSKY, ALFREDO HILADO, MARK VARGO, JOANNE RUIZ, KENNETH TURNER and ANTOINETTE LAWS, together with persons known and unknown to the grand jury, fraudulently obtained over 70 mortgage loans in a total amount of approximately \$10 million from lenders, including financial institutions, by making materially false representations and omissions in loan applications, supporting documentation and appraisals concerning the buyers' employment, financial condition, contribution towards the purchase price and intention to occupy the property, and the sales price, condition and value of the property, and for the purpose of executing the scheme caused interstate wire transmissions and deliveries by interstate carrier.

4. It was further part of the scheme that defendants RICHARD LISNEK, JUDY KIEN, K & L REAL ESTATE and D & J PROPERTIES purchased distressed properties from entities including the Department of Housing and Urban Development (HUD) and then resold the distressed property for fraudulently inflated prices approximately two to three times the purchase price.

5. It was further part of the scheme that defendant RICHARD LISNEK solicited

individuals with good credit to buy distressed properties from defendants K&L REAL ESTATE and D&J PROPERTIES by promising that they would not have to invest any of their own money and promising to rehabilitate the property and make the mortgage payments until the property was rehabilitated or provide the funds to rehabilitate the property, and assist in obtaining tenants for the property under HUD's Section 8 program.

6. It was further part of the scheme that defendant RICHARD LISNEK caused defendants ALFREDO HILADO and MARK VARGO to recruit individuals to buy distressed properties from defendants K&L REAL ESTATE and D&J PROPERTIES and defendants ALFREDO HILADO and MARK VARGO recruited individuals to buy distressed properties from defendants K&L REAL ESTATE and D&J PROPERTIES knowing that the transactions would be financed by making false statements to lenders to obtain mortgage loans.

7. It was further part of the scheme that defendant RICHARD LISNEK paid individuals, including defendant MARK VARGO, to make the distressed properties what defendant LISNEK referred to as "camera ready" or "picture ready" by performing cosmetic repairs to front and rear exteriors, so that the property would appear in exterior photographs to have been rehabilitated or to be in better than its actual condition.

8. It was further part of the scheme that defendants JAMES HEILAND, BRANDON BRADFORD and VLAD OSTROMOGILSKY knowingly prepared appraisals of distressed properties which intentionally inflated the property value and falsely represented that the property had been rehabilitated or was in better than its actual condition, well knowing that the false appraisals would be used in support of fraudulent loan applications.

9. It was further part of the scheme that defendants JAMES HEILAND, BRANDON BRADFORD and VLAD OSTROMOGILSKY knowingly prepared appraisals using interior

photographs from different properties in support of false representations that the interior of property being appraised had been rehabilitated or was in better than its actual condition, and defendant RICHARD LISNEK knowingly provided interior photographs for use in false appraisals.

10. It was further part of the scheme that defendant RICHARD LISNEK, through American Eagle Mortgage, caused to be prepared and submitted to lenders on behalf of buyers of distressed properties from defendant K&L REAL ESTATE loan applications and supporting documents which contained material false statements, including inflating the purchase price by falsely representing the buyers's contribution to the purchase price, defendant LISNEK well knowing that funds represented to the lenders as provided by the buyer would be provided by defendants RICHARD LISNEK and JUDY KIEN from funds of defendant K&L REAL ESTATE or from funds of persons known and unknown to the grand jury.

11. It was further part of the scheme that defendant RICHARD LISNEK, through American Eagle Mortgage, caused to be submitted to lenders in support of loan applications on behalf of purchasers of distressed properties from defendant K&L REAL ESTATE appraisals which inflated the property value and falsely represented that the property had been rehabilitated or was in better than actual condition, defendant LISNEK well knowing that the condition of the property was not as represented in the appraisal and that the values were inflated.

12. It was further part of the scheme that defendants RICHARD LISNEK and ALEX BULMASH agreed defendant LISNEK would direct buyers of distressed property to defendant INVESTMENT MORTGAGE GROUP which would prepare and submit to lenders on behalf of the buyers loan applications and supporting documents containing material false statements for the purpose of fraudulently obtaining mortgage loans.

13. It was further part of the scheme that defendant ALEX BULMASH and RICHARD LISNEK caused employees of defendant INVESTMENT MORTGAGE GROUP, including defendants MICHAEL BULMASH, ALLEN BULMASH and ANTHONY NAVICKAS, and persons known and unknown to the grand jury, to prepare and submit to lenders on behalf of buyers of distressed property from defendants K&L REAL ESTATE, D&J PROPERTIES and RICHARD LISNEK loan applications and supporting documents containing material false statements for the purpose of fraudulently obtaining mortgage loans.

14. It was further part of the scheme that defendant MICHAEL BULMASH knowingly prepared and submitted to lenders on behalf of buyers of distressed property from defendants K&L REAL ESTATE, D&J PROPERTIES and RICHARD LISNEK loan applications and supporting documents, including verifications of deposit and rent, and property leases, containing material false statements for the purpose of fraudulently obtaining mortgage loans.

15. It was further part of the scheme that defendant ALLEN BULMASH knowingly prepared and caused to be submitted to lenders on behalf of buyers of distressed property from defendants K&L REAL ESTATE, D&J PROPERTIES and RICHARD LISNEK supporting documents, including verifications of deposit, employment and rent, and property leases, containing material false statements for the purpose of fraudulently obtaining mortgage loans.

16. It was further part of the scheme that defendant ANTHONY NAVICKAS knowingly prepared and caused to be submitted to lenders on behalf of buyers of distressed property from defendants K&L REAL ESTATE, D&J PROPERTIES and RICHARD LISNEK supporting documents, including verifications of deposit and rent, and property leases, containing material false statements for the purpose of fraudulently obtaining mortgage loans.

17. It was further part of the scheme that defendants RICHARD LISNEK and MICHAEL BULMASH through defendant INVESTMENT MORTGAGE GROUP caused to be submitted to lenders in support of loan applications on behalf of buyers of distressed properties appraisals which inflated the property value and falsely represented that the property had been rehabilitated or was in better than actual condition, defendants LISNEK and MICHAEL BULMASH, well knowing that the condition of the property was not as represented in the appraisals and that the values were inflated.

18. It was further part of the scheme that defendants RICHARD LISNEK and JUDY KIEN knowingly provided funds, including funds from accounts in the names of defendants JUDY KIEN, K&L REAL ESTATE and D&J PROPERTIES, to be falsely represented to lenders as the buyers' contribution to the purchase price, and defendants LISNEK and KIEN knowingly caused these funds to be falsely represented to lenders as the buyers' contribution to the purchase price.

19. It was further part of the scheme that defendant LYNN LISKIEWICZ caused defendant LASALLE TITLE to close property transactions of defendants K&L REAL ESTATE, D&J PROPERTIES and RICHARD LISNEK in a manner which facilitated fraudulently obtaining mortgage loan proceeds by creating materially false closing documents to conceal from lenders that funds represented as the buyers' contribution to the purchase price were provided by the sellers, that the purchase price was inflated, and that, therefore, lenders had been defrauded into financing all or a greater portion of the transaction than represented for buyers with little or no equity in the property.

20. It was further part of the scheme that, in closings at defendant LASALLE TITLE for property sales by defendants K&L REAL ESTATE, D&J PROPERTIES and RICHARD

LISNEK, defendant JUDY KIEN knowingly signed settlement statements (HUD-1s) on behalf of the sellers which falsely represented to lenders the buyers' contribution to the purchase price, defendant KIEN well knowing that funds represented as having been provided by the buyers were provided by defendants LISNEK and KIEN.

21. It was further part of the scheme that defendant LYNN LISKIEWICZ caused settlement agents of defendant LASALLE TITLE to accept funds from sellers on behalf of buyers and to prepare and sign HUD-1s which concealed from lenders that sellers were paying a portion of the purchase price on behalf of buyers and falsely represented to lenders that funds provided by sellers were the buyers' contribution to the purchase price.

22. It was further part of the scheme that defendant LYNN LISKIEWICZ knowingly accepted funds from sellers on behalf of buyers and prepared and signed HUD-1s which fraudulently concealed from lenders that sellers were paying a portion of the purchase price on behalf of buyers and falsely represented to lenders that funds provided by sellers were the buyers' contribution to the purchase price, and sent these materially false HUD-1s to lenders.

23. It was further part of the scheme that defendants ALFREDO HILADO, MARK VARGO, JOANNE RUIZ, KENNETH TURNER and ANTOINETTE LAWS purchased property from defendants K & L REAL ESTATE and D & J PROPERTIES well knowing that their purchase was financed with a fraudulently obtained mortgage loan and signed and caused others to sign loan applications containing material false statements.

24. It was further part of the scheme that defendants RICHARD LISNEK, JUDY KIEN, K & L REAL ESTATE, D & J PROPERTIES, ALEX BULMASH, MICHAEL BULMASH, ALLEN BULMASH, ANTHONY NAVICKAS, INVESTMENT MORTGAGE GROUP, LYNN LISKIEWICZ, LASALLE TITLE, JAMES HEILAND, BRANDON BRADFORD, VLAD

OSTROMOGILSKY, ALFREDO HILADO, MARK VARGO, JOANNE RUIZ, KENNETH TURNER and ANTOINETTE LAWS, did misrepresent, conceal and hide, and cause to be misrepresented, concealed and hidden, acts done in furtherance of the scheme and the purpose of those acts.

25. On or about July 22, 2004, at Chicago, in the Northern District of Illinois, Eastern Division,

RICHARD LISNEK,
K & L REAL ESTATE, INC.,
LYNN LISKIEWICZ and
LASALLE TITLE COMPANY,

defendants herein, for the purpose of executing and attempting to execute the above-described scheme, did knowingly cause to be sent and delivered by commercial interstate carrier according to the direction thereon to American Home Mortgage Acceptance in Melville, New York, the final closing documents for two mortgage loans of approximately \$140,250 by American Brokers Conduit for the purchase of 5718 South Seeley, Chicago, Illinois, including a HUD-1 which falsely represented the cash from borrower as approximately \$24,407;

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

COUNT TWO

The SPECIAL FEBRUARY 2008-1 GRAND JURY further charges:

1. The allegations of paragraphs 1 through 24 of Count One are realleged and incorporated as though fully set forth herein.
2. On or about July 29, 2004, at Chicago, in the Northern District of Illinois, Eastern Division,

RICHARD LISNEK,
JUDY KIEN,
ALEX BULMASH,
MICHAEL BULMASH,
ALLEN BULMASH,
INVESTMENT GROUP, INC.,
LASALLE TITLE COMPANY,
BRANDON BRADFORD and
MARK VARGO,

defendants herein, for the purpose of executing and attempting to execute the above-described scheme, did knowingly cause to be sent and delivered by commercial interstate carrier according to the direction thereon to American Home Mortgage Acceptance in Melville, New York, the final closing documents for two mortgage loans of approximately \$106,250 by American Brokers Conduit for the purchase 6038 S. Wolcott, Chicago, Illinois, including a HUD-1 which falsely represented the cash from borrower as approximately \$19,184;

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

COUNT THREE

The SPECIAL FEBRUARY 2008-1 GRAND JURY further charges:

1. The allegations of paragraphs 1 through 24 of Count One are realleged and incorporated as though fully set forth herein.
2. On or about October 21, 2004, at Chicago, in the Northern District of Illinois, Eastern Division,

RICHARD LISNEK,
JUDY KIEN,
K & L REAL ESTATE, INC.,
ALEX BULMASH,
MICHAEL BULMASH,
ALLEN BULMASH,
INVESTMENT GROUP, INC.,
LA SALLE TITLE COMPANY,
JAMES HEILAND and
KENNETH TURNER,

defendants herein, for the purpose of executing and attempting to execute the above-described scheme, did knowingly cause to be transmitted by means of a wire communication in interstate commerce from New York, New York, to Melrose Park, Illinois, certain signs, signals and sounds, namely, a wire transfer of approximately \$115,623, which funds were the proceeds of a mortgage loan made by Argent Mortgage Company for the purchase of 7227 South Paulina, Chicago, Illinois;

In violation of Title 18, United States Code, Sections 1343 and 2.

COUNT FOUR

The SPECIAL FEBRUARY 2008-1 GRAND JURY further charges:

1. The allegations of paragraphs 1 through 24 of Count One are realleged and incorporated as though fully set forth herein.
2. On or about December 3, 2004, at Chicago, in the Northern District of Illinois, Eastern Division,

RICHARD LISNEK,
JUDY KIEN,
LASALLE TITLE COMPANY,
JAMES HEILAND and
MARK VARGO,

defendants herein, for the purpose of executing and attempting to execute the above-described scheme, did knowingly cause to be transmitted by means of a wire communication in interstate commerce from New York, New York, to Melrose Park, Illinois, certain signs, signals and sounds, namely, a wire transfer of approximately \$115,954, which funds were the proceeds of a mortgage loan made by Argent Mortgage Company for the purchase of 6020 South Elizabeth, Chicago, Illinois;

In violation of Title 18, United States Code, Sections 1343 and 2.

COUNT FIVE

The SPECIAL FEBRUARY 2008-1 GRAND JURY further charges:

1. The allegations of paragraphs 1 through 24 of Count One are realleged and incorporated as though fully set forth herein.
2. On or about December 30, 2004, at Chicago, in the Northern District of Illinois, Eastern Division,

RICHARD LISNEK,
JUDY KIEN,
K & L REAL ESTATE, INC.,
ALEX BULMASH,
MICHAEL BULMASH,
ALLEN BULMASH,
INVESTMENT GROUP, INC.,
LASALLE TITLE COMPANY,
JAMES HEILAND and
KENNETH TURNER,

defendants herein, for the purpose of executing and attempting to execute the above-described scheme, did knowingly cause to be transmitted by means of a wire communication in interstate commerce from New York, New York, to Melrose Park, Illinois, certain signs, signals and sounds, namely, a wire transfer of approximately \$146,989, which funds were the proceeds of a mortgage loan made by Argent Mortgage Company for the purchase of 5125 South Wolcott, Chicago, Illinois;

In violation of Title 18, United States Code, Sections 1343 and 2.

COUNT SIX

The SPECIAL FEBRUARY 2008-1 GRAND JURY further charges:

1. The allegations of paragraphs 1 through 24 of Count One are realleged and incorporated as though fully set forth herein.
2. On or about January 21, 2005, at Chicago, in the Northern District of Illinois, Eastern Division,

RICHARD LISNEK,
JUDY KIEN,
K & L REAL ESTATE, INC.,
ALEX BULMASH,
MICHAEL BULMASH,
ALLEN BULMASH,
INVESTMENT GROUP, INC.,
LASALLE TITLE COMPANY,
VLAD OSTROMOGILSKY and
ALFREDO HILADO,

defendants herein, for the purpose of executing and attempting to execute the above-described scheme, did knowingly cause to be transmitted by means of a wire communication in interstate commerce from New York, New York, to Chicago, Illinois, certain signs, signals and sounds, namely, a wire transfer of approximately \$116,388, which funds were the proceeds of a mortgage loan made by Argent Mortgage Company for the purchase of 6019 S. Laflin Street, Chicago, Illinois;

In violation of Title 18, United States Code, Sections 1343 and 2.

COUNT SEVEN

The SPECIAL FEBRUARY 2008-1 GRAND JURY further charges:

1. The allegations of paragraphs 1 through 24 of Count One are realleged and incorporated as though fully set forth herein.
2. On or about January 31, 2005, at Chicago, in the Northern District of Illinois, Eastern Division,

RICHARD LISNEK,
JUDY KIEN,
K & L REAL ESTATE, INC.,
ALEX BULMASH,
MICHAEL BULMASH,
ALLEN BULMASH,
INVESTMENT GROUP, INC.,
LASALLE TITLE COMPANY,
JOANNE RUIZ and
MARK VARGO,

defendants herein, for the purpose of executing and attempting to execute the above-described scheme, did knowingly cause to be transmitted by means of a wire communication in interstate commerce from Seattle, Washington, to Chicago, Illinois, certain signs, signals and sounds, namely, a wire transfer of approximately \$120,700, which funds were the proceeds of a mortgage loan made by Long Beach Mortgage Company for the purchase of 5805 S. Aberdeen Street, Chicago, Illinois;

In violation of Title 18, United States Code, Sections 1343 and 2.

COUNT EIGHT

The SPECIAL FEBRUARY 2008-1 GRAND JURY further charges:

1. The allegations of paragraphs 1 through 24 of Count One are realleged and incorporated as though fully set forth herein.
2. On or about February 28, 2005, at Chicago, in the Northern District of Illinois, Eastern Division,

RICHARD LISNEK,
JUDY KIEN,
K & L REAL ESTATE, INC.,
ALEX BULMASH,
MICHAEL BULMASH,
INVESTMENT GROUP, INC.,
LASALLE TITLE COMPANY and
VLAD OSTROMOGILSKY,

defendants herein, for the purpose of executing and attempting to execute the above-described scheme, did knowingly cause to be transmitted by means of a wire communication in interstate commerce from Seattle, Washington, to Chicago, Illinois, certain signs, signals and sounds, namely, a wire transfer of approximately \$113,596, which funds were the proceeds of a mortgage loan made by Long Beach Mortgage Company for the purchase of 10551 S. LaSalle Street, Chicago, Illinois;

In violation of Title 18, United States Code, Sections 1343 and 2.

COUNT NINE

The SPECIAL FEBRUARY 2008-1 GRAND JURY further charges:

1. The allegations of paragraphs 1 through 24 of Count One are realleged and incorporated as though fully set forth herein.
2. On or about February 28, 2005, at Chicago, in the Northern District of Illinois, Eastern Division,

RICHARD LISNEK,
JUDY KIEN,
K & L REAL ESTATE, INC.,
ALEX BULMASH,
MICHAEL BULMASH,
ALLEN BULMASH,
INVESTMENT GROUP, INC.,
LASALLE TITLE COMPANY,
JAMES HEILAND and
BRANDON BRADFORD,

defendants herein, for the purpose of executing and attempting to execute the above-described scheme, did knowingly cause to be transmitted by means of a wire communication in interstate commerce from New York, New York, to Chicago, Illinois, certain signs, signals and sounds, namely, a wire transfer of approximately \$143,345, which funds were the proceeds of a mortgage loan made by American Brokers Conduit for the purchase of 8517 S. Marquette Avenue, Chicago, Illinois;

In violation of Title 18, United States Code, Sections 1343 and 2.

COUNT TEN

The SPECIAL FEBRUARY 2008-1 GRAND JURY further charges:

1. The allegations of paragraphs 1 through 24 of Count One are realleged and incorporated as though fully set forth herein.
2. On or about April 14, 2005, at Chicago, in the Northern District of Illinois, Eastern Division,

RICHARD LISNEK,
JUDY KIEN,
K & L REAL ESTATE, INC.,
ALEX BULMASH,
MICHAEL BULMASH,
ANTHONY NAVICKAS,
INVESTMENT GROUP, INC.,
LASALLE TITLE COMPANY and
JAMES HEILAND,

defendants herein, for the purpose of executing and attempting to execute the above-described scheme, did knowingly cause to be transmitted by means of a wire communication in interstate commerce from New York, New York, to Chicago, Illinois, certain signs, signals and sounds, namely, a wire transfer of approximately \$124,054, which funds were the proceeds of a mortgage loan made by Argent Mortgage Company for the purchase of 7014 S. Winchester Avenue, Chicago, Illinois;

In violation of Title 18, United States Code, Sections 1343 and 2.

COUNT ELEVEN

The SPECIAL FEBRUARY 2008-1 GRAND JURY further charges:

1. The allegations of paragraphs 1 through 24 of Count One are realleged and incorporated as though fully set forth herein.

2. On or about April 27, 2005, at Chicago, in the Northern District of Illinois, Eastern Division,

RICHARD LISNEK,
JUDY KIEN,
K & L REAL ESTATE, INC.,
ALEX BULMASH,
MICHAEL BULMASH,
INVESTMENT GROUP, INC.,
LASALLE TITLE COMPANY,
JAMES HEILAND,
JOANNE RUIZ and
MARK VARGO,

defendants herein, for the purpose of executing and attempting to execute the above-described scheme, did knowingly cause to be transmitted by means of a wire communication in interstate commerce from New York, New York, to Chicago, Illinois, certain signs, signals and sounds, namely, a wire transfer of approximately \$116,264, which funds were the proceeds of a mortgage loan made by Argent Mortgage Company for the purchase of 5710 S. Throop Street, Chicago, Illinois;

In violation of Title 18, United States Code, Sections 1343 and 2.

COUNT TWELVE

The SPECIAL FEBRUARY 2008-1 GRAND JURY further charges:

1. The allegations of paragraphs 1 through 24 of Count One are realleged and incorporated as though fully set forth herein.
2. On or about June 3, 2005, at Chicago, in the Northern District of Illinois, Eastern Division,

RICHARD LISNEK,
JUDY KIEN,
K & L REAL ESTATE, INC.,
ALEX BULMASH,
MICHAEL BULMASH,
ALLEN BULMASH,
INVESTMENT GROUP, INC.,
LASALLE TITLE COMPANY,
JAMES HEILAND and
ANTOINETTE LAWS,

defendants herein, for the purpose of executing and attempting to execute the above-described scheme, did knowingly cause to be transmitted by means of a wire communication in interstate commerce from New York, New York, to Chicago, Illinois, certain signs, signals and sounds, namely, a wire transfer of approximately \$133,603, which funds were the proceeds of a mortgage loan made by Argent Mortgage Company for the purchase of 7036 S. Winchester Avenue, Chicago, Illinois;

In violation of Title 18, United States Code, Sections 1343 and 2.

COUNT THIRTEEN

The SPECIAL FEBRUARY 2008-1 GRAND JURY further charges:

1. The allegations of paragraphs 1 through 24 of Count One are realleged and incorporated as though fully set forth herein.
2. On or about June 10, 2005, at Chicago, in the Northern District of Illinois, Eastern Division,

RICHARD LISNEK,
JUDY KIEN,
ALEX BULMASH,
MICHAEL BULMASH,
ALLEN BULMASH,
INVESTMENT GROUP, INC.,
LASALLE TITLE COMPANY and
JAMES HEILAND,

defendants herein, for the purpose of executing and attempting to execute the above-described scheme, did knowingly cause to be transmitted by means of a wire communication in interstate commerce from New York, New York, to Chicago, Illinois, certain signs, signals and sounds, namely, a wire transfer of approximately \$132,848, which funds were the proceeds of a mortgage loan made by Argent Mortgage Company for the purchase of 455 W. 103rd Place, Chicago, Illinois;

In violation of Title 18, United States Code, Sections 1343 and 2.

COUNT FOURTEEN

The SPECIAL FEBRUARY 2008-1 GRAND JURY further charges:

1. The allegations of paragraphs 1 through 24 of Count One are realleged and incorporated as though fully set forth herein.
2. On or about October 11, 2005, at Chicago, in the Northern District of Illinois, Eastern Division,

RICHARD LISNEK,
JUDY KIEN,
K & L REAL ESTATE, INC.,
ALEX BULMASH,
MICHAEL BULMASH,
ANTHONY NAVICKAS,
INVESTMENT GROUP, INC.,
LASALLE TITLE COMPANY and
ANTOINETTE LAWS,

defendants herein, for the purpose of executing and attempting to execute the above-described scheme, did knowingly cause to be transmitted by means of a wire communication in interstate commerce from New York, New York, to Chicago, Illinois, certain signs, signals and sounds, namely, a wire transfer of approximately \$133,030, which funds were the proceeds of a mortgage loan made by Argent Mortgage Company for the purchase of 7918 S. Marquette Avenue, Chicago, Illinois;

In violation of Title 18, United States Code, Sections 1343 and 2.

COUNT FIFTEEN

The SPECIAL FEBRUARY 2008-1 GRAND JURY further charges:

1. The allegations of paragraphs 1 through 24 of Count One are realleged and incorporated as though fully set forth herein.
2. On or about October 24, 2005, at Chicago, in the Northern District of Illinois, Eastern Division,

RICHARD LISNEK,
JUDY KIEN,
K & L REAL ESTATE, INC.,
ALEX BULMASH,
MICHAEL BULMASH,
INVESTMENT GROUP, INC.,
LASALLE TITLE COMPANY,
JAMES HEILAND and
ANTOINETTE LAWS,

defendants herein, for the purpose of executing and attempting to execute the above-described scheme, did knowingly cause to be transmitted by means of a wire communication in interstate commerce from Stockton, California, to Chicago, Illinois, certain signs, signals and sounds, namely, a wire transfer of approximately \$129,087, which funds were the proceeds of a mortgage loan made by Long Beach Mortgage Company for the purchase of 5754 S. LaSalle Street, Chicago, Illinois;

In violation of Title 18, United States Code, Sections 1343 and 2.

COUNT SIXTEEN

The SPECIAL FEBRUARY 2008-1 GRAND JURY further charges:

1. The allegations of paragraphs 1 through 24 of Count One are realleged and incorporated as though fully set forth herein.
2. On or about December 20, 2005, at Chicago, in the Northern District of Illinois, Eastern Division,

RICHARD LISNEK,
K & L REAL ESTATE, INC.,
LYNN LISKIEWICZ and
LASALLE TITLE COMPANY,

defendants herein, for the purpose of executing and attempting to execute the above-described scheme, did knowingly cause to be sent and delivered by commercial interstate carrier according to the directions thereon to Long Beach Mortgage Company in Itasca, Illinois, the final loan documents for the mortgage loan of approximately \$135,000 made by Long Beach Mortgage Company for the purchase of 6204 S. Paulina Avenue, Chicago, Illinois, including a HUD-1 which falsely represented the cash from borrower as approximately \$19,560;

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

COUNT SEVENTEEN

The SPECIAL FEBRUARY 2008-1 GRAND JURY further charges:

1. The allegations of paragraphs 1 through 24 of Count One are realleged and incorporated as though fully set forth herein.
2. On or about February 10, 2006, at Chicago, in the Northern District of Illinois, Eastern Division,

RICHARD LISNEK,
JUDY KIEN,
D & J PROPERTIES II, INC.,
ALEX BULMASH,
MICHAEL BULMASH,
INVESTMENT GROUP, INC.,
LASALLE TITLE COMPANY and
JAMES HEILAND,

defendants herein, for the purpose of executing and attempting to execute the above-described scheme, did knowingly cause to be transmitted by means of a wire communication in interstate commerce from Stockton, California, to Chicago, Illinois, certain signs, signals and sounds, namely, a wire transfer of approximately \$168,257, which funds were the proceeds of a mortgage loan made by Long Beach Mortgage Company for the purchase of 9145 S. Woodlawn, Chicago, Illinois;

In violation of Title 18, United States Code, Sections 1343 and 2.

COUNT EIGHTEEN

The SPECIAL FEBRUARY 2008-1 GRAND JURY further charges:

1. The allegations of paragraphs 1 through 24 of Count One are realleged and incorporated as though fully set forth herein.
2. On or about February 13, 2006, at Chicago, in the Northern District of Illinois, Eastern Division,

RICHARD LISNEK,
JUDY KIEN,
D & J PROPERTIES II, INC.,
ALEX BULMASH,
MICHAEL BULMASH,
ANTHONY NAVICKAS,
INVESTMENT GROUP, INC.,
LASALLE TITLE COMPANY,
JAMES HEILAND and
ALFREDO HILADO,

defendants herein, for the purpose of executing and attempting to execute the above-described scheme, did knowingly cause to be transmitted by means of a wire communication in interstate commerce from New York, New York, to Chicago, Illinois, certain signs, signals and sounds, namely, a wire transfer of approximately \$140,465, which funds were the proceeds of a mortgage loan made by Countrywide Home Loans Inc. for the purchase of 6210 S. Honore Street, Chicago, Illinois;

In violation of Title 18, United States Code, Sections 1343 and 2.

COUNT NINETEEN

The SPECIAL FEBRUARY 2008-1 GRAND JURY further charges:

1. The allegations of paragraphs 1 through 24 of Count One are realleged and incorporated as though fully set forth herein.
2. On or about July 24, 2006, at Chicago, in the Northern District of Illinois, Eastern Division,

RICHARD LISNEK,
JUDY KIEN,
D & J PROPERTIES II, INC.,
LYNN LISKIEWICZ and
LASALLE TITLE COMPANY,

defendants herein, for the purpose of executing and attempting to execute the above-described scheme, did knowingly cause to be transmitted by means of a wire communication in interstate commerce from New York, New York to Chicago, Illinois, certain signs, signals and sounds, namely, a wire transfer of approximately \$142,171, which funds were the proceeds of a mortgage loan made by America's Wholesale Lender for the purchase of 6335 S. Damen Avenue, Chicago, Illinois;

In violation of Title 18, United States Code, Sections 1343 and 2.

COUNT TWENTY

The SPECIAL FEBRUARY 2008-1 GRAND JURY further charges:

1. The allegations of paragraphs 1 through 24 of Count One are realleged and incorporated as though fully set forth herein.
2. On or about July 25, 2006, at Chicago, in the Northern District of Illinois, Eastern Division,

RICHARD LISNEK,
JUDY KIEN,
D & J PROPERTIES II, INC.,
LYNN LISKIEWICZ and
LASALLE TITLE COMPANY,

defendants herein, for the purpose of executing and attempting to execute the above-described scheme, did knowingly cause to be sent and delivered by commercial interstate carrier according to the directions thereon to Countrywide Home Loans Inc. in Lisle, Illinois, the final loan documents for the mortgage loan of approximately \$144,000 made by America's Wholesale Lender for the purchase of 6335 S. Damen Avenue, Chicago, Illinois, including a HUD-1 which falsely represented the cash from borrower as approximately \$18,581;

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

COUNT TWENTY-ONE

The SPECIAL FEBRUARY 2008-1 GRAND JURY further charges:

1. The allegations of paragraphs 1 through 24 of Count One are realleged and incorporated as though fully set forth herein.
2. On or about August 15, 2006, at Chicago, in the Northern District of Illinois, Eastern Division,

RICHARD LISNEK,
JUDY KIEN,
D & J PROPERTIES II, INC.,
LYNN LISKIEWICZ and
LASALLE TITLE COMPANY,

defendants herein, for the purpose of executing and attempting to execute the above-described scheme, did knowingly cause to be transmitted by means of a wire communication in interstate commerce from New York, New York, to Chicago, Illinois, certain signs, signals and sounds, namely, a wire transfer of approximately \$146,717, which funds were the proceeds of a mortgage loan made by Countrywide Home Loans Inc. for the purchase of 253 W. 112th Place, Chicago, Illinois;

In violation of Title 18, United States Code, Sections 1343 and 2.

COUNT TWENTY-TWO

The SPECIAL FEBRUARY 2008-1 GRAND JURY further charges:

1. The allegations of paragraphs 1 through 24 of Count One are realleged and incorporated as though fully set forth herein.
2. On or about August 16, 2006, at Chicago, in the Northern District of Illinois, Eastern Division,

RICHARD LISNEK,
JUDY KIEN,
D & J PROPERTIES II, INC.,
LYNN LISKIEWICZ and
LASALLE TITLE COMPANY,

defendants herein, for the purpose of executing and attempting to execute the above-described scheme, did knowingly cause to be sent and delivered by commercial interstate carrier according to the directions thereon to Countrywide Home Loans in Lisle, Illinois, a loan document for the mortgage loan of approximately \$148,500 made by Countrywide Home Loans for the purchase of 253 W. 112th Place, Chicago, Illinois, including a HUD-1 which falsely represented the cash from borrower as approximately \$19,223;

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

FORFEITURE ALLEGATION

The SPECIAL FEBRUARY 2008-1 GRAND JURY further charges:

1. The allegations of Counts 1 through 22 of this Indictment are realleged and incorporated by reference as if fully restated herein for the purpose of alleging that certain property is subject to forfeiture to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c).

2. As a result of their violations of Title 18, United States Code, Sections 1341 and 1343, as alleged in the foregoing Indictment,

RICHARD LISNEK,
JUDY KIEN,
K & L REAL ESTATE, INC.,
D & J PROPERTIES II, INC.,
ALEX BULMASH,
MICHAEL BULMASH,
ALLEN BULMASH,
ANTHONY NAVICKAS,
INVESTMENT GROUP, INC.,
LYNN LISKIEWICZ,
LASALLE TITLE COMPANY,
JAMES HEILAND,
BRANDON BRADFORD,
VLAD OSTROMOGILSKY,
ALFREDO HILADO,
MARK VARGO,
JOANNE RUIZ,
KENNETH TURNER and
ANTOINETTE LAWS,

defendants herein, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c), any and all right, title, and interest they may have in any property, real and personal, involved in the mail and wire fraud offenses, and traceable to the property involved in the offenses, which property is subject to forfeiture pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United

States Code, Section 2461(c).

3. The interests of the defendants subject to forfeiture to the United States pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c), include the sum of approximately \$5,800,000. .

4. By virtue of the commission of the offenses charged in Counts 1 through 22 of this Indictment by the defendants, all right, title or interest that defendants have in the above-described property is vested in the United States and hereby forfeit pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c).

5. If any of the property described above as being subject to forfeiture pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c), as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred to, sold to, or deposited with a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value;
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States to seek forfeiture of substitute property under the provisions of Title 21, United States Code, Section 853(p) as incorporated by Title 18, United States Code, Section 982(b)(1) and Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c).

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

A TRUE BILL:

FOREPERSON

UNITED STATES ATTORNEY