

CR 17-62 RHK

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA	)	<b>INFORMATION</b>
	)	
Plaintiff,	)	18 U.S.C. § 1343
	)	
v.	)	
	)	
PATRIC G. MONAHAN,	)	
	)	
Defendant.	)	

THE UNITED STATES OF AMERICA CHARGES THAT:

**COUNT 1**  
(Wire Fraud)

From in or about January 2008 and continuing thereafter through in or about February 2014, in the State and District of Minnesota, and elsewhere, Defendant,

**PATRIC G. MONAHAN,**

did knowingly and intentionally devise and participate in a scheme and artifice to defraud and to obtain money and property from VICTIM COMPANIES by means of materially false and fraudulent pretenses, representations, promises, and material omissions, and for the purpose of executing and attempting to execute such scheme and artifice, did knowingly cause to be transmitted in interstate commerce certain writings, signs, signals, pictures, and sounds by wire, including, but not limited to, an email, on or about May 27, 2012, from Defendant to REALTOR A's company, concerning a property that was owned by a VICTIM COMPANY and implicated in the scheme and artifice, in violation of Title 18, United States Code, Section 1343.

**FORFEITURE ALLEGATIONS**

Upon conviction of Count 1 of this Information, Defendant shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C); Title 18, United States

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Code, Section 982(a)(2)(A); and Title 28, United States Code, Section 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the violation of Title 18, United States Code, Section 1343.

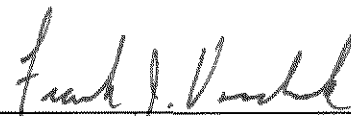
If any of the above-described forfeitable property is unavailable for forfeiture, the United States intends to seek the forfeiture of substitute property as provided for in Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

Date: 16 MARCH 2017

U.S. DEPARTMENT OF JUSTICE,  
ANTITRUST DIVISION, BY



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FRANK J. VONDRAK  
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