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| CLERK US DISTRICT COURT DISTRICT OF NEVADA | |
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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA
-oOo-**

UNITED STATES OF AMERICA,
Plaintiff,

v.

MAHIN QUINTERO,
Defendant.

CASE NO.: 2:12-cr-00031-GMN -PAL
DATE FILED:
VIOLATION:
18 U.S.C. §1028(a)(1) (producing a false
authentication feature- 1 count)

INFORMATION

INTRODUCTION

THE UNITED STATES CHARGES THAT:

At all times material to this Information:

1. Chateau Versailles, Chateau Nouveau, Vistana and Pebble Creek were common interest communities located in Las Vegas, Nevada. These communities were governed by a board of directors that were elected by the homeowners in the community.

1 2. Accomplice A was a construction company incorporated in the state of Nevada.
2 Accomplice A purported to specialize in home building and home repairs, including repairs involving
3 so-called construction defects.

4 3. Accomplice A was owned and controlled by Accomplice B, a Nevada resident.

5 4. Accomplice C was a business, operated and controlled by Accomplice B and others.
6 Accomplice C was created to further a scheme to obtain control of homeowners' associations boards
7 of directors by using straw purchasers to purchase condominiums in the common interest communities
8 and run for election to the HOA boards. Once on the board, the straw purchasers were paid to use
9 their votes to award contracts to Accomplice A and others.

10 5. Accomplice D was a licensed realtor in the State of Nevada.

11 6. Defendant QUINTERO was a licensed notary public in the State of Nevada from
12 in or around April 2005 through at least in or around December 2006.

13 7. Pursuant to Nevada law, a notary public is a licensed individual authorized to
14 perform notarial acts, to include, among other things, witnessing or attesting to a signature and
15 administering an oath or affirmation. In order to have the authority to execute a notarization, the
16 signatory or affiant must physically appear before the notary public. A notary seal is a mark that
17 authenticates that the document was actually signed by the purported signatory.

18 8. Pursuant to Nevada law, a notary public must keep a notary log book and document
19 all notarizations that are performed. The notary log book must be made available for public
20 inspection.

21 9. Defendant QUINTERO was employed as a loan processor by Accomplice C
22 between in or around October 2005 until in or around February 2006. As a part of her employment,
23 Defendant QUINTERO was asked to notarize documents on behalf of Accomplices A, B, and others,
24 for residential mortgage loans for straw purchasers who were buying condominium units at Vistana,
25 Chateau Nouveau, Chateau Versailles, Pebble Creek, and other condominium complexes.
26

10. These loan documents were provided to Defendant QUINTERO by Accomplice D and others.

11. On several occasions, Defendant notarized these residential mortgage documents and other documents, authenticating the mortgagee's signature, without the signatory of the document physically appearing before her, as required by her State of Nevada notary license. Defendant's notary log book either did not account for these notarizations or did not include the signature of the individual for whom the notarization was executed.

COUNT ONE

12. Paragraphs 1 through 11 of this Information are re-alleged and incorporated by reference as though fully set forth herein.

13. Between in or around October 2005 through in or around February 2006, in the District of Nevada, Defendant

MAHIN QUINTERO,

did knowingly and without lawful authority produce an authentication feature, to wit, a notary seal, and the notary seal was or appeared to be issued by or under the authority of the United States.

In violation of Title 18, United States Code, Section 1028(a)(1).

NOTICE OF FORFEITURE

1. As a result of the violations of Title 18, United States Code, Section 1028, set forth in this information, Defendant

MAHIN QUINTERO


shall forfeit to the United States of America any property, real or personal, that constitutes or is derived from proceeds traceable to the commission of such offenses, as charged in this information.

2. If any of the property subject to forfeiture, as a result of any act or omission of the defendant:

- 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;

it is the intent of the United States, pursuant to Title 18, United States Code, Section 982(b), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property subject to forfeiture.

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


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