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CLERK U.S. DISTRICT COURT
CENTRAL DIST. OF CALIF.
LOS ANGELES

BY _____

UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

January 2016 Grand Jury

UNITED STATES OF AMERICA,

Plaintiff,

v.

DOROTHY MATSUBA,

aka "Yun Matsuba,"

aka "Yum Matsuba,"

aka "Yunsoon Matsuba,"

aka "Mayumi Matsuba,"

YOUNG PARK,

aka "Dane Park,"

JANE MATSUBA-GARCIA,

aka "Jane Garcia,"

aka "Jane Park,"

aka "Lucy Vanalden,"

aka "Gabby Charis,"

JAMIE MATSUBA,

aka "Jamie Michaels,"

aka "Jamie Yukari," and

THOMAS MATSUBA,

Defendants.

No.

CR16-0538

I N D I C T M E N T

[18 U.S.C. § 371: Conspiracy;
18 U.S.C. § 1343: Wire Fraud;
18 U.S.C. § 1014: False
Statements in Loan and Credit
Applications; 18 U.S.C.
§ 1028A(a)(1): Aggravated
Identity Theft; 18 U.S.C. § 2:
Aiding and Abetting and Causing
An Act To Be Done; 18 U.S.C.
§§ 981, 982, 1028(b)(5); 28
U.S.C. § 2461: Criminal
Forfeiture]

The Grand Jury charges:

COUNT ONE

[18 U.S.C. § 371]

A. INTRODUCTORY ALLEGATIONS

At all times relevant to this Indictment:

DEFENDANTS

1. Defendant DOROTHY MATSUBA, also known as ("aka") "Yun Matsuba," aka "Yum Matsuba," aka "Yunsoon Matsuba," aka "Mayumi Matsuba" (hereinafter "DOROTHY MATSUBA"), was a resident of Los Angeles County, within the Central District of California. In or about 1999, defendant DOROTHY MATSUBA founded a real estate-related business under the name Creative Group Resource, LLC, and later founded and operated Owner Management Service, LLC, dba Trust Holding Service Co., Boston Holding Company, Bill Pay Service, POWER DOT.REALESTATE GROUP, Inc., and Westside Servicing Co. Through these entities and her family members, defendant DOROTHY MATSUBA controlled every aspect of the offenses as detailed herein.

2. Defendant YOUNG PARK, aka "Dane Park" (hereinafter "YOUNG PARK"), is the brother of defendant DOROTHY MATSUBA and was a resident of Los Angeles County, within the Central District of California. From in or about 2005 through in or about 2009, defendant YOUNG PARK was an employee of Trust Holding Service. His duties included assisting in the property management department and marketing and client development efforts.

3. Defendant JANE MATSUBA-GARCIA, aka "Jane Garcia," aka "Jane Park," aka "Lucy Vanalden," aka "Gabby Charis" (hereinafter "JANE MATSUBA"), is the older daughter of

1 defendants DOROTHY MATSUBA and THOMAS MATSUBA and was a resident
2 of Los Angeles County, within the Central District of
3 California. From in or around 2005 through in or around 2011,
4 and through occasional involvement thereafter, defendant JANE
5 MATSUBA was an employee and officer of Trust Holding Service,
6 and from in or around 2008 through 2011, was head of its so-
7 called "Short Sale Department." From in or around 2008 through
8 2009, defendant JANE MATSUBA was an officer of Owner Management
9 Service, LLC.

10 4. Defendant JAMIE MATSUBA, aka "Jamie Michaels," aka
11 "Jamie Yukari" (hereinafter "JAMIE MATSUBA"), is the younger
12 daughter of defendants DOROTHY MATSUBA and THOMAS MATSUBA and
13 was a resident of Los Angeles County, within the Central
14 District of California. From in or around 2003 through in or
15 around 2015, defendant JAMIE MATSUBA was an employee and officer
16 of Trust Holding Service. From in or around 2008 through 2014,
17 defendant JAMIE MATSUBA was an officer of Ramsfire Global, LLC.
18 From in or around 2011 through in or around 2014, defendant
19 JAMIE MATSUBA was an officer of Ramsfire Equity Partners, Inc.
20 From in or around 2008 through in or around 2009, in or around
21 2010 through in or around 2012, and in or around 2014 through in
22 or around 2015, defendant JAMIE MATSUBA helped lead the Trust
23 Holding Service's so-called "Property Management Department."

24 5. Defendant THOMAS MATSUBA was the husband of defendant
25 DOROTHY MATSUBA and a resident of Los Angeles County, within the
26 Central District of California. He was the primary finance
27 manager for the OMS Companies and as detailed below controlled
28 other entities instrumental in the alleged offenses. From in or

1 around 2008 through in or around 2015, defendant THOMAS MATSUBA
2 was an officer and member of Ramsfire Global, LLC. From in or
3 around 2011 through in or around 2012, defendant THOMAS MATSUBA
4 was an officer of Owner Management Service, LLC.

5 MATSUBA-CONTROLLED COMPANIES

6 6. The defendants used a variety of affiliated companies
7 to carry out the offenses described herein. The defendants were
8 officers, members, or owners of these various affiliated
9 companies and their dbas, predecessors, and successors, which
10 included the following entities:

11 a. Creative Group Resource, LLC. On or about January
12 20, 1999, Creative Group Resource, LLC, was registered in
13 California, identifying its agent as defendant DOROTHY MATSUBA.
14 On or about April 2, 2003, Creative Group Resource, LLC,
15 identified its managers as defendant JANE MATSUBA and R.G.

16 b. Ramsfire Equity Partners, Inc. On or about
17 December 23, 2003, Ramsfire Equity Partners, Inc., was
18 registered in Nevada. Beginning on or about September 16, 2008,
19 through in or about 2015, defendants JAMIE MATSUBA and THOMAS
20 MATSUBA served as officers of Ramsfire Equity Partners, Inc.

21 c. Ramsfire Global, LLC, dba OMS, LLC. On or about
22 December 23, 2003, Ramsfire Global, LLC, was registered in
23 Nevada, and identified its member as Ramsfire Equity Partners,
24 Inc. Defendants JANE MATSUBA and THOMAS MATSUBA, beginning in or
25 around December 2008, and defendant JAMIE MATSUBA, beginning in
26 or around November 2010, served as officers of Ramsfire Global,
27 LLC. On or about January 30, 2012, approximately 21 days after
28 Owner Management Service, LLC, filed bankruptcy, defendant JAMIE

1 MATSUBA amended Ramsfire Global, LLC's Articles of Organization
2 to change its name to OMS, LLC. On or about March 9, 2012, OMS,
3 LLC, filed an application to register OMS, LLC, as a foreign
4 corporation operating in California under the name OMS Global,
5 LLC.

6 d. Westside Servicing Company. On or about October
7 29, 2003, defendant JANE MATSUBA registered Westside Servicing
8 Company in Nevada. Defendant JANE MATSUBA, beginning in or
9 around 2003, defendant THOMAS MATSUBA, beginning in or around
10 December 2008, and defendant JAMIE MATSUBA, beginning in or
11 around December 2009, served as officers for Westside Servicing
12 Company.

13 e. Owner Management Service, LLC. On or about
14 November 19, 2008, defendants DOROTHY MATSUBA and JANE MATSUBA
15 registered Owner Management Service, LLC, in Nevada. On or about
16 July 21, 2009, Owner Management Service, LLC, filed an
17 application to register as a foreign company in California.

18 f. Boston Holding Company. On or about May 14, 2004,
19 defendant DOROTHY MATSUBA registered Boston Holding Company in
20 California as a fictitious business name for defendant DOROTHY
21 MATSUBA. On or about October 29, 2008, Boston Holding Company
22 was registered in California as a fictitious business name for
23 Owner Management Service, LLC.

24 g. Trust Holding Service Co. On or about March 9,
25 2007, defendant DOROTHY MATSUBA registered Trust Holding Service
26 Co. in California as a fictitious business name for defendant
27 DOROTHY MATSUBA. On or about July 25, 2008, defendant DOROTHY

1 MATSUBA registered Trust Holding Service Co. in California as a
2 fictitious business name for Owner Management Service, LLC.

3 h. POWER DOT.REALESTATE GROUP, Inc. On or about
4 March 22, 2010, POWER DOT.REALESTATE GROUP, Inc., dba Power Dot
5 Realty was registered in California, with the registered agent
6 as defendant DOROTHY MATSUBA at the address 20960 Knapp St.
7 #888, Chatsworth, CA 91311.

8 i. Bill Pay Service. On or about September 27, 2007,
9 defendant JAMIE MATSUBA registered Bill Pay Service in
10 California as a fictitious business name for defendant JAMIE
11 MATSUBA. On or about October 29, 2008, defendant JAMIE MATSUBA
12 registered Bill Pay Service in California as a fictitious
13 business name for Owner Management Service, LLC.

14 7. These companies were all controlled by the defendants
15 and eventually operated from 20960 Knapp Street, Chatsworth,
16 within the Central District of California. These companies are
17 collectively referred to herein as "the OMS Companies."

18 DEFINITIONS

19 8. As used in this Indictment, the term "short sale"
20 refers to the sale of real estate property for an amount less
21 than the balance owed on the mortgage loan for the property. A
22 short sale often occurs when a borrower cannot pay the mortgage
23 loan on the borrower's property and the property is worth less
24 than the balance owed on the mortgage, but the borrower and
25 mortgage holder decide that selling the property at a loss is
26 better than foreclosure.

27 9. As used in this Indictment, the term "distressed
homeowners" means homeowners who were having difficulty making

1 mortgage payments on, and who were facing foreclosure on, their
2 properties. The term "distressed properties" refers to the
3 properties of the distressed homeowners.

4 FINANCIAL INSTITUTIONS

5 10. Wells Fargo Bank, N.A. was a federally chartered
6 financial institution, the deposits of which were insured by the
7 Federal Deposit Insurance Corporation ("FDIC"). Wells Fargo Home
8 Mortgage, Inc. ("Wells Fargo Home Mortgage"), doing business as
9 America's Servicing Company, was a wholly owned subsidiary of
10 Wells Fargo Bank. Wells Fargo Home Mortgage and America's
11 Servicing Company were mortgage lending businesses which funded
12 and serviced mortgage loans for properties in the Central
13 District of California and elsewhere. At all relevant times,
14 Wells Fargo Bank, Wells Fargo Home Mortgage, and America's
15 Servicing Company were "financial institutions" as defined in
16 Title 18, United States Code, Sections 20(1) and 20(10).

17 11. Citibank, N.A. ("Citibank"), was a federally chartered
18 financial institution, the deposits of which were insured by the
19 FDIC. CitiMortgage, Inc. ("CitiMortgage"), was a wholly owned
20 subsidiary of Citibank, N.A. CitiMortgage was a mortgage lending
21 business which funded and serviced mortgage loans for properties
22 in the Central District of California and elsewhere. At all
23 relevant times, Citibank and CitiMortgage were "financial
24 institutions" as defined in Title 18, United States Code,
25 Sections 20(1) and 20(10).

26 12. American Home Mortgage Servicing, Inc. ("AHMSI"),
27 later renamed Homeward Residential, Inc., and thereafter
28 acquired by Ocwen Financial Corporation, was a mortgage lending

1 business, that is, an organization which finances and refinances
2 debt secured by an interest in real estate. At all relevant
3 times, AHMSI was a financial institution as defined in Title 18,
4 United States Code, Section 20(10), which funded and serviced
5 mortgage loans for properties in the Central District of
6 California and elsewhere.

7 13. Washington Mutual, N.A. ("WaMu"), at times doing
8 business as Washington Mutual Bank, was a federally chartered
9 financial institution, the deposits of which were insured by the
10 FDIC, which thereafter was acquired by JPMorgan Chase Bank, N.A.
11 ("JPMorgan Chase"), which also was a federally chartered
12 financial institution, the deposits of which were insured by the
13 FDIC. At all relevant times, WaMu and JPMorgan Chase were
14 "financial institutions" as defined in Title 18, United States
15 Code, Section 20(1). WaMu and JPMorgan Chase funded mortgage
16 loans for properties in the Central District of California and
17 elsewhere.

18 PROPERTIES

19 14. The property at 13243 Bryson Street, Arleta,
20 California ("the Bryson Street property") is located within the
21 Central District of California and was a distressed property
22 taken over by the OMS Companies. The conspirators, acting
23 through the OMS Companies, leased the Bryson Street property to
24 third parties and collected rent.

25 15. The property at 10454 Willowbrae Avenue, Chatsworth,
26 California ("the Willowbrae Avenue property") is located within
27 the Central District of California. It was a distressed property
28 taken over by the OMS Companies. The conspirators, acting

1 through the OMS Companies, leased the property to third parties
2 and collected rent.

3 16. The property at 6501 Radford Avenue, North Hollywood,
4 California ("the Radford Avenue property"), is located within
5 the Central District of California. It was a distressed property
6 taken over by the OMS Companies. The conspirators, acting
7 through the OMS Companies, leased the property to third parties
8 and collected rent.

9 17. The property at 20101 Halsted St., Chatsworth,
10 California ("the Halsted Street property"), is located within
11 the Central District of California. It was a distressed property
12 taken over by the OMS Companies. The conspirators, acting
13 through the OMS Companies, leased the property to third parties
14 and collected rent.

15 18. The property at 10415 Monogram Avenue, Granada Hills,
16 California ("the Monogram Avenue property"), is located within
17 the Central District of California. It was a distressed property
18 taken over by the OMS Companies. The conspirators, acting
19 through the OMS Companies, leased the property to third parties
20 and collected rent.

21 B. THE OBJECTS OF THE CONSPIRACY

22 19. Beginning in or around January 2005, and continuing to
23 in or around August 6, 2014, within the Central District of
24 California and elsewhere, defendants DOROTHY MATSUBA, YOUNG
25 PARK, JANE MATSUBA, JAMIE MATSUBA, and THOMAS MATSUBA, together
26 with others known and unknown to the Grand Jury, knowingly
27 combined, conspired, and agreed to commit the following offenses
28 against the United States:

1 (a) wire fraud, that is to knowingly and with intent to
2 defraud, devise, and intend to devise, a scheme and artifice to
3 defraud, and to obtain money and property, by means of
4 materially false and fraudulent pretenses, representations, and
5 promises, and to transmit and caused to be transmitted, through
6 the use of interstate wires, any writing, sign, signal, picture
7 or sound for the purpose of executing such scheme, in violation
8 of Title 18, United States Code, Section 1343;

9 (b) to knowingly make false statements or reports in
10 connection with loan applications, including any modification,
11 extension, or deferment thereof, for the purpose of influencing
12 the actions of institutions the accounts of which were then
13 insured by the Federal Deposit Insurance Corporation ("FDIC")
14 and for the purpose of influencing the actions of mortgage
15 lending businesses, in violation of Title 18, United States
16 Code, Section 1014; and

17 (c) identity theft, that is to knowingly possess with
18 intent to use unlawfully and transfer unlawfully five or more
19 identification documents not issued lawfully for the defendants'
20 use, authentication features, and false identification
21 documents, namely, both real and false California driver's
22 licenses, social security cards, and authentication features
23 found therein and elsewhere, such identification documents,
24 false identification documents, and authentication features
25 which appeared to have been issued by and under the authority of
26 the United States, in violation of Title 18, United States Code,
27 Section 1028(a)(3).

1 C. THE MANNER AND MEANS OF THE CONSPIRACY

2 20. The objects of the conspiracy were to be carried out
3 and were carried out, in substance, as follows:

4 21. Through the OMS Companies, defendants DOROTHY MATSUBA,
5 YOUNG PARK, and other co-conspirators sought to identify
6 distressed homeowners.

7 22. Defendants DOROTHY MATSUBA, YOUNG PARK, and other co-
8 conspirators misrepresented to the distressed homeowners that
9 they would perform a short sale and thus avoid foreclosure on
10 the distressed properties. Based on those misrepresentations,
11 the distressed homeowners transferred title for the distressed
12 properties to trusts and companies the conspirators controlled.

13 23. Instead of performing short sales as represented,
14 defendants DOROTHY MATSUBA, YOUNG PARK, JANE MATSUBA, JAMIE
15 MATSUBA, THOMAS MATSUBA, and co-conspirators leased the
16 distressed properties to third parties and to other distressed
17 homeowners, collected the rent, and failed to make timely
18 mortgage payments on the distressed properties.

19 24. Defendants DOROTHY MATSUBA and YOUNG PARK arranged for
20 the OMS Companies to purchase identification documents, false
21 identification documents, and authentication features, including
22 California driver's licenses and social security cards, for the
23 purpose of using the identities to mislead the mortgage lenders
24 about the distressed properties.

25 25. In exchange for compensation, co-conspirators assisted
26 in the creation of false identification documents and
27 transmitted copies of those and other materials, including more
28 than five identification documents, false identification

1 documents, and authentication features therein and elsewhere, to
2 defendants DOROTHY MATSUBA and YOUNG PARK.

3 26. Both false and real identification documents purchased
4 were, or appeared to be, issued by and under the authority of
5 the California Department of Motor Vehicles, the United States'
6 Social Security Administration, and other such issuing
7 authorities, and defendants DOROTHY MATSUBA and YOUNG PARK knew
8 as much. Likewise, defendants THOMAS MATSUBA and JANE MATSUBA
9 were made aware that their co-conspirators and the OMS Companies
10 possessed the aforementioned materials, and thereafter,
11 knowingly and jointly possessed them.

12 27. To perpetuate the conspiracy, the conspirators also
13 engaged in various deceptive tactics designed to delay
14 foreclosure on the distressed properties so the conspirators
15 could continue collecting rent. These tactics included:

16 a. fabricating short sale purchase offers for the
17 distressed properties, including using stolen and fictitious
18 identities, and fictitious hardship letters, and submitting
19 those fabricated purchase offers, in most instances by wire,
20 that is, facsimile communication, in interstate commerce, to
21 financial institutions which acted as lenders and servicers;

22 b. falsifying financial and tax statements for the
23 distressed homeowners, including by forging the homeowners'
24 signatures, and submitting those documents, in most instances by
25 wire, that is, facsimile communication, in interstate commerce,
26 to financial institutions acting as lenders and servicers;

27 c. filing bankruptcy petitions for the distressed
28 homeowners, sometimes without their knowledge, including by

1 forging the distressed homeowners' signatures on the petitions
2 and giving notice of such filings to the financial institutions
3 acting as lenders and servicers;

4 d. filing fabricated and fictitious liens on the
5 distressed properties; and

6 e. obtaining mortgage loans in the names of stolen
7 identities for the purchase of distressed properties.

8 28. The conspirators caused payments to be made to
9 themselves and the OMS Companies from the proceeds of the
10 scheme, including tens of millions of dollars in rental income
11 from the distressed properties, collected at the expense of the
12 financial institutions and financially distressed homeowners.

13 29. As a result of such deceptive tactics, the
14 conspirators defrauded the distressed homeowners, in many cases
15 ruining their credit history, and financial institutions, which
16 were intentionally exposed to new and increased risk of loss and
17 increased administrative costs.

18 D. OVERT ACTS

19 30. In furtherance of the conspiracy and to accomplish its
20 objects, defendants DOROTHY MATSUBA, YOUNG PARK, JANE MATSUBA,
21 JAMIE MATSUBA, and THOMAS MATSUBA, and other co-conspirators
22 known and unknown to the Grand Jury, committed and willfully
23 caused others to commit the following overt acts, among others,
24 in the Central District of California and elsewhere:

25 Overt Act No. 1: On or about April 2, 2007, defendants
26 DOROTHY MATSUBA, JAMIE MATSUBA, and THOMAS MATSUBA transferred
27 and caused to be transferred the Monogram Avenue property to a
28 trust controlled by the conspirators.

1 Overt Act No. 2: On or about June 25, 2007, defendants
2 DOROTHY MATSUBA, YOUNG PARK, and THOMAS MATSUBA, submitted and
3 caused to be submitted, a false application to WaMu for a
4 mortgage loan, financing the purchase of the Monogram Avenue
5 property in the name of stolen identity S.Y.Y.

6 Overt Act No. 3: On or about June 26, 2009, defendants
7 DOROTHY MATSUBA, JANE MATSUBA, and JAMIE MATSUBA, submitted and
8 caused to be submitted, a fraudulent short sale purchase offer
9 for the Halsted Street property and related documents to AHMSI
10 in the name of stolen identity A.G., accompanied by fraudulent
11 financial hardship statements and other misrepresentations.

12 Overt Act No. 4: On or about December 11, 2009, defendant
13 DOROTHY MATSUBA wrote a check in the amount of \$11,075.00 from a
14 Wells Fargo bank account for Bill Pay Service, an OMS Company,
15 account number xxxxxx2050, to OMS employee C.L.

16 Overt Act No. 5: On or about December 12, 2009, defendants
17 DOROTHY MATSUBA and THOMAS MATSUBA caused OMS employee C.L. to
18 purchase a cashier's check payable to defendant THOMAS MATSUBA
19 in the amount of \$11,075.00.

20 Overt Act No. 6: On or about December 17, 2009, defendant
21 THOMAS MATSUBA deposited the cashier's check in the amount of
22 \$11,075.00 into a Wells Fargo bank account in the name of
23 defendants DOROTHY MATSUBA, JAMIE MATSUBA, and THOMAS MATSUBA,
24 account number xxxxxx8059.

25 Overt Act No. 7: On or about March 25, 2010, defendant
26 DOROTHY MATSUBA caused the submission of a fraudulent loan
27 modification request and related documents for the Halsted
28 Street property to AHMSI, including a falsified "Andex, Inc."

1 pay stub and containing false statements regarding her
2 unemployment and financial hardship.

3 Overt Act No. 8: On or about August 24, 2010, defendants
4 DOROTHY MATSUBA and JANE MATSUBA submitted, and caused to be
5 submitted, a fraudulent short sale purchase offer and related
6 documents for the Halsted Street property to AHMSI in the name
7 of fabricated identity J.A.

8 Overt Act No. 9: On or about June 22, 2011, defendants
9 DOROTHY MATSUBA and JANE MATSUBA caused a false short sale
10 purchase offer and related documents for the Bryson Street
11 property to be submitted in the name of stolen identity S.M.L.
12 to Wells Fargo dba America's Servicing Company to delay
13 foreclosure on the Bryson Street property.

14 Overt Act No. 10: On or about September 8, 2011,
15 defendants DOROTHY MATSUBA and JANE MATSUBA caused a false short
16 sale purchase offer Addendum on behalf of distressed homeowner
17 J.V. and stolen identity S.M.L. to be submitted to Wells Fargo,
18 dba America's Servicing Company, featuring forged signatures of
19 J.V. and S.M.L., to delay foreclosure on the Bryson Street
20 property.

21 Overt Act No. 11: On or about April 1, 2013, defendants
22 DOROTHY MATSUBA and JANE MATSUBA caused a false short sale
23 purchase offer and related documents in the name of E.D., and
24 short sale application in the name of stolen identity J.H., to
25 be transmitted via facsimile to CitiMortgage, located in
26 O'Fallon, Missouri, to delay foreclosure on the Radford Avenue
27 property.

1 Overt Act No. 12: On or about April 1, 2013, defendant
2 DOROTHY MATSUBA submitted false hardship documents in the name
3 of stolen identity J.H. via facsimile to CitiMortgage, located
4 in O'Fallon, Missouri, to delay foreclosure on the Radford
5 Avenue property.

6 Overt Act No. 13: On or about April 1, 2013, purportedly
7 on behalf of stolen identity J.H., and through the OMS
8 companies, defendant DOROTHY MATSUBA caused hardship
9 documentation to be submitted to CitiMortgage in support of a
10 fraudulent short sale application in the name of E.D. to delay
11 foreclosure on the Radford Avenue property.

12 Overt Act No. 14: On or about December 2, 2013, co-
13 conspirators prepared and submitted a false short sale purchase
14 offer and related documents in the name of K.G. via facsimile to
15 CitiMortgage, located in O'Fallon, Missouri, to delay
16 foreclosure on the Willowbrae Avenue property.

17 Overt Act No. 15: On or about January 6, 2014, a co-
18 conspirator fabricated a Real Estate Loan Pre-Approval Letter
19 for K.G., falsely stating that K.G. had been preapproved for a
20 loan, to delay foreclosure on the Willowbrae Avenue property.

21 Overt Act No. 16: On or about February 17, 2014, through
22 the OMS Companies' legal counsel, purportedly on behalf of the
23 trustee to a trust to which stolen identity S.M.L. had
24 transferred the Willowbrae Avenue property, defendant DOROTHY
25 MATSUBA caused a letter to be transmitted to CitiMortgage
26 seeking to delay foreclosure on the Willowbrae Avenue property.

27 Overt Act No. 17: On February 18, 2014, defendant DOROTHY
28 MATSUBA caused a letter to be faxed to CitiMortgage demanding,

1 by threat of TRO proceedings, that the bank refrain from
2 carrying out the planned foreclosure sale of the Willowbrae
3 property.

4 Overt Act No. 18: On or about February 20, 2014, defendant
5 DOROTHY MATSUBA caused to be filed a false and forged
6 "Declaration of S.M.L.," together with false assertion of legal
7 representation, in California Superior Court, Los Angeles
8 County, in support of an application for a temporary restraining
9 order and injunctive relief and further caused the same to be
10 served on CitiMortgage in order to delay foreclosure on the
11 Willowbrae Avenue property.

12 Overt Act No. 19: On or about April 3, 2014, defendant
13 DOROTHY MATSUBA caused a Loan Modification Request and related
14 documents in the name of distressed homeowner J.V., featuring
15 forged signatures and including a fabricated tax return, to be
16 submitted via facsimile to Wells Fargo Home Mortgage, dba
17 America's Servicing Company, located in Des Moines, Iowa in
18 order to delay foreclosure on the Bryson Street property.

19 Overt Act No. 20: On or about May 7, 2014, defendant
20 DOROTHY MATSUBA caused to be filed a false and forged
21 "Supplemental Declaration of S.M.L.," together with false
22 assertion of legal representation, in California Superior Court,
23 Los Angeles County, in support of an application for a temporary
24 restraining order and injunctive relief and further caused the
25 same to be served on CitiMortgage in order to delay foreclosure
26 on the Willowbrae Avenue property.

27 Overt Act No. 21: On or about August 6, 2014, in response
28 to federal law enforcement questions about California driver's

1 licenses seized from the OMS Companies' office space at 20960
2 Knapp Street, Chatsworth, California, defendant DOROTHY MATSUBA
3 made false statements to the effect that defendant YOUNG PARK
4 had found the licenses in a vacated home.
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COUNTS TWO THROUGH SIX

[18 U.S.C. §§ 1343, 2]

31. The Grand Jury hereby incorporates by reference and realleges paragraphs 1-18 and 21-30 as though fully set forth herein.

A. THE FRAUDULENT SCHEME

32. Beginning in or around 2008, and continuing through at least in or about 2014, in Los Angeles County, within the Central District of California, and elsewhere, defendants DOROTHY MATSUBA and JANE MATSUBA, together with others known and unknown to the Grand Jury, aiding and abetting each other, knowingly and with intent to defraud, devised and intended to devise, a scheme and artifice to defraud financial institutions, including mortgage lending businesses and servicers, and distressed homeowners, and to obtain money and property from financial institutions, including mortgage lending businesses, and distressed homeowners, by means of materially false and fraudulent pretenses, representations, and promises.

33. The fraudulent scheme was carried out, in substance, as described in paragraphs 21-30 of this Indictment.

B. USE OF THE WIRES

34. On or about the dates set forth below, within the Central District of California and elsewhere, the defendants named below, for the purpose of executing and attempting to execute the above-described scheme to defraud, each aiding and abetting the other, transmitted and caused to be transmitted the following items by means of wire communication in interstate

commerce:

COUNT	DEFENDANTS	DATE	ITEM WIRED
TWO	DOROTHY MATSUBA and JANE MATSUBA	9/8/11	False short sale purchase offer and related documents for the Bryson Street property submitted in the name of S.M.L. via facsimile, from the Central District of California, to Wells Fargo Home Mortgage, dba America's Servicing Company, located in Des Moines, Iowa
THREE	DOROTHY MATSUBA	4/3/14	Loan modification request for the Bryson Street property and related documents prepared without J.V.'s authorization, featuring forged signatures and including fabricated tax return, submitted via facsimile from the Central District of California to Wells Fargo Home Mortgage, dba America's Servicing Company, located in Des Moines, Iowa
FOUR	DOROTHY MATSUBA	12/2/13	False short sale purchase offer for the Willowbrae Avenue property and related hardship assistance documents submitted in the names of K.G. and stolen identity S.M.L. via facsimile from the Central District of California to CitiMortgage, located in O'Fallon, Missouri

COUNT	DEFENDANTS	DATE	ITEM WIRED
FIVE	DOROTHY MATSUBA	4/1/13	False short sale purchase offer for the Radford Avenue property and related documents in the names of E.D. a fictitious person and J.H., a stolen identity, transmitted via facsimile from the Central District of California to CitiMortgage, located in O'Fallon, Missouri
SIX	DOROTHY MATSUBA	4/10/13	False hardship letters in connection with the Radford Avenue property in the name of J.H., a stolen identity, transmitted via facsimile from the Central District of California to CitiMortgage, located in O'Fallon, Missouri

COUNTS SEVEN AND EIGHT

[18 U.S.C. §§ 1014, 2]

35. The Grand Jury hereby incorporates by reference and realleges paragraphs 1-18 of this Indictment as though fully set forth herein.

36. On or about the dates set forth below, in Los Angeles County, within the Central District of California, and elsewhere, defendant DOROTHY MATSUBA, together with others known and unknown to the Grand Jury, aiding and abetting each other, knowingly submitted and willfully caused to be submitted, on behalf of stolen identity S.M.L., the following false statements, documents, and reports related to the Willowbrae property, for the purpose of influencing the actions of CitiMortgage, a mortgage lending business, in connection with residential loan applications and any change, extension, or deferment thereto:

COUNT	DATE	FALSE STATEMENT
SEVEN	2/20/14	False and forged "Declaration of S.M.L.," in name of stolen identity S.M.L., together with false assertion of legal representation, filed in California Superior Court, Los Angeles County, in support of an application for a temporary restraining order and injunctive relief related to the Willowbrae property, and concurrently served on CitiMortgage

COUNT	DATE	FALSE STATEMENT
EIGHT	5/7/14	False and forged "Supplemental Declaration of S.M.L.," in name of stolen identity S.M.L., together with false assertion of legal representation, filed in California Superior Court, Los Angeles County, in support of an application for a temporary restraining order and injunctive relief related to the Willowbrae property, and concurrently served on CitiMortgage

COUNTS NINE THROUGH ELEVEN

[18 U.S.C. §§ 1014, 2]

37. The Grand Jury hereby incorporates by reference and realleges paragraphs 1-18 of this Indictment as though fully set forth herein.

38. On or about the dates set forth below, in Los Angeles County, within the Central District of California, and elsewhere, the defendants named below, together with others known and unknown to the Grand Jury, aiding and abetting each other, knowingly submitted and willfully caused to be submitted, on behalf of the false and stolen identities A.G. and J.A., the following false statements, documents, and reports related to the Halsted Street property, for the purpose of influencing the actions of AHSMI, a mortgage lending business, in connection with residential loan applications, and any change, extension, or deferment thereto:

COUNT	DEFENDANT	DATE	FALSE STATEMENT
NINE	DOROTHY MATSUBA, JANE MATSUBA, and JAMIE MATSUBA	6/26/09	False short sale purchase offer for the Halsted Street property and related documents, including false statements regarding unemployment and financial hardship, submitted to AHMSI in the name of stolen identity A.G.
TEN	DOROTHY MATSUBA	3/25/10	False loan modification request for the Halsted Street property and related documents, including fabricated "Andex, Inc." pay stub and false statements regarding unemployment and financial

COUNT	DEFENDANT	DATE	FALSE STATEMENT
ELEVEN	DOROTHY MATSUBA and JANE MATSUBA	8/24/10	False short sale purchase offer for the Halsted Street property and related documents, including false statements regarding unemployment and financial hardship, submitted to AHMSI in the name of fabricated identity J.A.

COUNT TWELVE

[18 U.S.C. §§ 1014, 2]

39. The Grand Jury hereby incorporates by reference and realleges paragraphs 1-18 of this Indictment as if fully set forth herein.

40. On or about June 25, 2007, in Los Angeles County, within the Central District of California, and elsewhere, defendants DOROTHY MATSUBA, THOMAS MATSUBA, and YOUNG PARK, together with others known and unknown to the Grand Jury, aiding and abetting each other, knowingly submitted and willfully caused to be submitted, on behalf of stolen identity S.Y.Y., a false mortgage loan application related to the Monogram Avenue property, for the purpose of influencing the actions of WaMu, an institution the accounts of which were then insured by the Federal Deposit Insurance Corporation, in connection with a residential loan application and any change, extension, or deferment thereto.

COUNTS THIRTEEN THROUGH EIGHTEEN

[18 U.S.C. §§ 1028A(a)(1), 2]

41. The Grand Jury hereby incorporates by reference and realleges paragraphs 1-18 of this Indictment as if fully set forth herein.

42. On or about the dates set forth below, in Los Angeles County, within the Central District of California, and elsewhere, defendants DOROTHY MATSUBA and JANE MATSUBA, together with others known and unknown to the Grand Jury, aiding and abetting each other, knowing that the means of identification belonged to another person, knowingly transferred, possessed, and used, without lawful and legal authority, and willfully caused to be transferred, possessed, and used, without lawful and legal authority, the following means of identification of another person during and in relation to the following felony violations charged in the counts of this Indictment identified below:

COUNT	DEFENDANTS	DATE	MEANS OF IDENTIFICATION	RELATED FELONY VIOLATION
THIRTEEN	DOROTHY MATSUBA and JANE MATSUBA	9/8/11	Name and Signature of S.M.L.	Wire Fraud (Count TWO)
FOURTEEN	DOROTHY MATSUBA	12/2/13	Name, Social Security Number, and Signature of S.M.L.	Wire Fraud (Count FOUR)

COUNT	DEFENDANTS	DATE	MEANS OF IDENTIFICATION	RELATED FELONY VIOLATION
FIFTEEN	DOROTHY MATSUBA	4/1/13	Name, Social Security Number, and Signature of J.H.	Wire Fraud (Count FIVE)
SIXTEEN	DOROTHY MATSUBA	4/10/13	Name and Signature of J.H.	Wire Fraud (Count SIX)
SEVENTEEN	DOROTHY MATSUBA	2/20/14	Name and Signature of S.M.L.	False Statement (Count SEVEN)
EIGHTEEN	DOROTHY MATSUBA	5/7/14	Name and Signature of S.M.L.	False Statement (Count EIGHT)

1 CRIMINAL FORFEITURE ALLEGATIONS

2 [18 U.S.C. §§ 981(a)(1)(C), 982(a)(2)(B), 1028(b)(5)
3 and 28 U.S.C. § 2461(c)]

4 43. The allegations contained in Counts ONE through TWELVE
5 of this Indictment are hereby realleged and incorporated by
6 reference for the purpose of alleging forfeiture pursuant to
7 Title 18, United States Code, Section 981(a)(1)(C), Title 18,
8 United States Code, Section 982(a)(2), Title 18, United States
9 Code, Section 1028(b)(5), and Title 28, United States Code,
10 Section 2461(c).

11 44. Upon conviction of the first object of the conspiracy
12 alleged in Count One of the Indictment, and/or violations
13 alleged in Counts Two through Six of the Indictment, defendants
14 DOROTHY MATSUBA, YOUNG PARK, JANE MATSUBA-GARCIA, JAMIE MATSUBA,
15 and THOMAS MATSUBA shall forfeit to the United States of
16 America, pursuant to Title 18, United States Code, Section
17 981(a)(1)(C) and Title 28, United States Code, Section 2461(c),
18 all of their interest in any property constituting or derived
19 from proceeds obtained directly or indirectly as a result of the
20 said violations.

21 45. Upon conviction of the second object of the conspiracy
22 alleged in Count One of the Indictment, and/or the violations
23 alleged in Counts Seven through Twelve of the Indictment,
24 defendants DOROTHY MATSUBA, YOUNG PARK, JANE MATSUBA-GARCIA,
25 JAMIE MATSUBA, and THOMAS MATSUBA, shall forfeit to the United
26 States of America, pursuant to Title 18, United States Code,
27 Section 982(a)(2)(B) any and all right, title, and interest

1 they have in any property constituting, or derived from,
2 proceeds the person obtained directly or indirectly, as a result
3 of such violations.

4 46. Upon conviction of the third object of the conspiracy
5 alleged in Count One of the Indictment, defendants DOROTHY
6 MATSUBA, YOUNG PARK, JANE MATSUBA-GARCIA, JAMIE MATSUBA, and
7 THOMAS MATSUBA, shall forfeit to the United States of America,
8 pursuant to Title 18, United States Code, Section 982(a)(2)(B),
9 any and all right, title, and interest they have in any property
10 constituting or derived from, proceeds the person obtained
11 directly or indirectly, as a result of such violations and
12 pursuant to Title 18, United States Code, Section 1028(b)(5) any
13 personal property used or intended to be used to commit the
14 offense.

15 47. If any of the property described above, as a result of
16 any act or omission of defendants DOROTHY MATSUBA, YOUNG PARK,
17 JANE MATSUBA-GARCIA, JAMIE MATSUBA, and THOMAS MATSUBA:

- 18 a. Cannot be located upon the exercise of due diligence;
- 19 b. Has been transferred or sold to, or deposited with, a
20 third party;
- 21 c. Has been placed beyond the jurisdiction of the court;
- 22 d. Has been substantially diminished in value; or
- 23 e. Has been commingled with other property which cannot
24 be divided without difficulty;

25 It is the intent of the United States, pursuant to Title 21,
26 United States Code, Section 853(p), as incorporated by Title 18,
27 United States Code, Sections 982(b)(1) and 1028(a), and Title
28 28, United States Code, Section 2461(c), to seek the forfeiture

1 of any other property of defendants DOROTHY MATSUBA, YOUNG PARK,
2 JANE MATSUBA-GARCIA, JAMIE MATSUBA, and THOMAS MATSUBA up to the
3 value of the above forfeitable property and obtain a money
4 judgment in an amount equal to the value of the property
5 involved in the violation.

7 A TRUE BILL

9 15/
Foreperson

11 EILEEN M. DECKER
12 United States Attorney
13 Central District of California

14 
15 LAWRENCE S. MIDDLETON
16 Assistant United States Attorney
17 Chief, Criminal Division

18 GEORGE S. CARDONA
19 Assistant United States Attorney
20 Chief, Major Frauds Section

21 ANDREW WEISSMANN
22 Chief
23 U.S. Department of Justice
24 Criminal Division, Fraud Section

25 
26 NIALL M. O'DONNELL
27 DAVID A. BYBEE
Trial Attorneys
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Criminal Division, Fraud Section