

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>UNITED STATES OF AMERICA</b>	<b>:</b>	<b>CRIMINAL NO.</b>
<b>v.</b>	<b>:</b>	<b>DATE FILED:</b>
<b>RASHIKA J. MOON</b>	<b>:</b>	<b>VIOLATIONS:</b>
	<b>:</b>	<b>18 U.S.C. § 371 (conspiracy to commit</b>
	<b>:</b>	<b>loan and wire fraud - 1 count)</b>
	<b>:</b>	<b>18 U.S.C. § 1010 (false statement in</b>
	<b>:</b>	<b>connection with Federal Housing</b>
	<b>:</b>	<b>Administration loan - 1 count)</b>
	<b>:</b>	<b>18 U.S.C. § 1014 (loan fraud - 1 count)</b>
	<b>:</b>	<b>18 U.S.C. § 2 (aiding and abetting)</b>
	<b>:</b>	<b>Notice of forfeiture</b>

**INFORMATION**

**COUNT ONE**

**THE UNITED STATES ATTORNEY CHARGES THAT:**

At all times material to this information:

1. Willie G. Manley, Jr., charged elsewhere, worked as a self-employed accountant at a tax preparation service.
2. John William Polosky, charged elsewhere, was a mortgage broker in Pittsburgh, Pennsylvania. Polosky's duties as a mortgage broker included preparing loan applications and submitting them, along with supporting documentation, to potential lenders to secure loans and mortgages.
3. Eric Ponder, charged elsewhere, held himself out as a real estate developer and the president of Ponder Development Inc., a Philadelphia company providing home improvement services.
4. K.F., R.F., E.B., and W.B. created a real estate settlement company,

REGGL Inc d/b/a KREW Settlement Services (“KREW”), which had its office in Philadelphia, Pennsylvania. “KREW” is an acronym for the first names of these four individuals, who also created a second real estate settlement company, Briser Abstract Company (“Briser Abstract”), which operated out of KREW’s office in Philadelphia, Pennsylvania and generally operated under the KREW name.

5. K.F. worked as a Title Agent at 21<sup>st</sup> Century Abstract Company and PA/NJ Abstract prior to creating KREW.

6. Defendant RASHIKA J. MOON was associated with KREW, and had authority to sign checks for and access KREW’s bank account at the Citizens Bank.

7. The following companies were in the business of providing mortgage loans and did business in interstate commerce:

- a. Equifirst Mortgage Corporation;
- b. BNC Mortgage Inc.; and
- c. Saxon Mortgage, Inc..

8. The following banks did business in interstate commerce and were financial institution whose deposits were insured by the Federal Deposit Insurance Corporation (“FDIC”):

- a. National Penn Bank, FDIC Certificate Number 7414;
- b. Sovereign Bank; FDIC Certificate Number 29950;
- c. Bank of America, FDIC Certificate Number 3510;
- d. Washington Mutual Bank, FDIC Certificate Number 32633;
- e. Wells Fargo Bank, FDIC Certificate Number 3511;
- f. Bank of New York, FDIC Certificate Number 639; and

g. First Tennessee Bank, FDIC Certificate Number 4977.

9. The Federal Housing Administration (“FHA”) is a Department within the U.S. Department of Housing and Urban Development (“HUD”) and provides mortgage insurance on loans made by FHA-approved lenders throughout the United States and its territories. FHA mortgage insurance provides lenders with protection against losses as the result of homeowners' defaulting on their mortgage loans. The lenders bear less risk because FHA will reimburse the lenders in the event of a homeowner's default.

10. FHA has requirements that must be met before FHA will insure a loan from an FHA-approved lender. One of those requirements is the property must be owner-occupied. FHA requires a borrower to establish bona fide occupancy in a home as the borrower's principal residence within 60 days of signing the security instrument, with continued occupancy for at least one year. FHA will not insure a mortgage if it is determined that the transaction was designed to use FHA mortgage insurance as a vehicle for obtaining investment properties. Wells Fargo Bank and PNC Mortgage were FHA-approved lenders during the time period set forth in this information.

### **THE CONSPIRACY**

11. From in or about May 2004, to in or about February 2009, in the Eastern District of Pennsylvania, and elsewhere, defendant

### **RASHIKA J. MOON**

conspired and agreed with E.B., K.F., R.F., W.B., F.C., G.T., C.B., M.M., D.D., Willie G. Manley, Jr., John William Polosky, and Eric Ponder, and others known and unknown to the United States Attorney, to knowingly make and cause to be made to federally-insured banks a false statement for the purpose of influencing the actions of the federally-insured banks upon a

loan and to knowingly devise a scheme to defraud, and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises, and to use interstate wires to further the scheme to defraud mortgage lenders and financial institutions, in violation of Title 18, United States Code, Sections 1014, 1343, and 1349.

### **MANNER AND MEANS**

It was part of the conspiracy that:

12. Defendant RASHIKA J. MOON, co-conspirators E.B., K.F., R.F., W.B., F.C., G.T., C.B., M.M., D.D., E.P., Willie G. Manley, Jr., John William Polosky, and Eric Ponder, and others known and unknown to the United States Attorney, assembled and submitted loan applications containing false information to lenders to dupe the lenders into loaning funds to purchase real properties within the Eastern District of Pennsylvania, the Eastern District of Virginia, the District of New Jersey, and elsewhere.

13. Co-conspirators E.B., E.P., and others known and unknown to the United States Attorney, typically sought out distressed properties to purchase in the West Philadelphia area. Sometimes, the properties were purchased in the names of co-conspirators R.F., G.T., C.B., M.M., D.D., E.P., or other co-conspirators. Other times, co-conspirators E.B., W.B., G.T., and E.P., and other co-conspirators, recruited others to act as the straw buyers in whose name the properties could be titled.

14. In order to secure the mortgage loans for the properties, co-conspirators John William Polosky, W.B., and R.F., and others known and unknown to the United States Attorney, prepared and brokered fraudulent loan applications that they knew contained materially false information, such as false W-2 Forms, false income tax returns and false payroll stubs for co-conspirators E.B. and E.P., and others. In addition, the applications were often supported by

false appraisals that grossly overstated the market values of the properties.

15. Co-conspirator Willie G. Manley, Jr., created false income documents such as W-2 Forms, paystubs, and Form 1040 income tax returns at the direction of E.B. and R.F., which were provided to the lenders and upon which the lenders relied when approving the mortgage loan applications.

16. Co-conspirator F.C. worked as a real estate appraiser and knowingly prepared and authorized the preparation of falsely-inflated appraisals for the properties, thereby overstating the actual values of the cheap homes being bought.

17. Co-conspirator C.B. falsely represented to lenders that various straw buyers worked at the same company at which C.B. worked, when in reality they did not.

18. Starting in or about October 2007, co-conspirator K.F. began creating fake title insurance policies and falsely informed lenders that title insurance policies were genuine and had been obtained for the properties.

19. Co-conspirator K.F., who served as title agent for most of the transactions, prepared two deeds and settlement statements (referred to as "Form HUD-1") – one for the seller that showed the actual agreed-upon sales price, and a false one for the lender that showed the grossly inflated sales price. K.F. sometimes recorded the false deed showing the grossly inflated sales price with the City of Philadelphia Records Department, which the defendants could then use to establish comparable sales for subsequent false loans for properties in the surrounding area.

20. Lenders, including FDIC-insured banks, many of which were outside the state of Pennsylvania, approved and accepted the loans having relied on the false information contained in the loan applications provided by co-conspirators W.B., R.F., and John William

Polosky, and other co-conspirators, and wired or mailed loan proceeds to title companies in Pennsylvania and Virginia, including title companies controlled by K.F. or at which K.F. worked.

21. After the loans funded, that seller was paid the agreed-upon sales price, and the difference between the actual sales price and the false sales price quoted to the lender was shared with and distributed by co-conspirator K.F. to defendant RASHIKA J. MOON and other co-conspirators who had been involved in securing the particular loan.

22. Defendant RASHIKA J. MOON, co-conspirators E.B., K.F., R.F., W.B., F.C., G.T, C.B, M.M, D.D., Willie G. Manley, Jr., Eric Ponder, and John William Polosky, and others known and unknown to the United States Attorney, sometimes arranged and facilitated either a fraudulent sale of the property from one straw buyer to another straw buyer or a fraudulent refinancing of the property.

23. In order to delay lenders from foreclosing on the properties long enough so the defendant and her co-conspirators could facilitate either a subsequent fraudulent sale of a property from one straw buyer to another straw buyer or a fraudulent refinancing of a property, defendant RASHIKA J. MOON, and her co-conspirators made some payments on the mortgages. Typically, the funds to pay the initial mortgage payments were provided by E.B., K.F., R.F., W.B., and Eric Ponder, to the straw buyer in whose name the property was titled so that the lenders would not suspect that the mortgage had been secured by fraud.

24. The mortgage fraud scheme involved more than 100 properties, mostly in the West Philadelphia area, and over \$20 million in loan proceeds were fraudulently obtained. Most properties have since fallen into foreclosure.

## OVERT ACTS

In furtherance of the conspiracy and to accomplish its objects, defendant RASHIKA J. MOON and her co-conspirators committed the following overt acts, among others, in the Eastern District of Pennsylvania, and elsewhere:

### **I. 5114 SPRINGFIELD AVENUE, PHILADELPHIA, PA**

#### **A. The March 17, 2005, Equifirst Mortgage Corporation Loan**

1. On or before March 17, 2005, defendant RASHIKA J. MOON, co-conspirators E.B., K.F., W.B., and Willie G. Manley, Jr., through D.M., a mortgage broker known to the United States Attorney, caused a mortgage loan application and supporting documents containing materially false statements to be submitted to Equifirst Mortgage Corporation that included, among other things, a false statement that 5114 Springfield Avenue would be defendant MOON's primary residence, a false statement that the sales price was approximately \$265,000 (when in fact the actual sales price was approximately \$95,000), a false statement that defendant MOON was employed by Foxworth, Inc. earning approximately \$1,694 per month, false W-2s and paystubs showing false income for defendant MOON, a false real estate sales contract, and two false leases showing approximately \$1,850 per month in rental income on the property, when in fact the actual monthly rental income on the property was only approximately \$420.

2. On or before March 17, 2005, co-conspirator W.B., acting as mortgage broker, referred defendant MOON's fraudulent mortgage loan application for 5114 Springfield Avenue to D.M.

3. On or about March 10, 2005, defendant RASHIKA J. MOON and co-conspirators E.B., K.F., W.B., and Willie G. Manley, Jr., caused to be sent in interstate

commerce a facsimile containing, among other things, two false leases showing approximately \$1,850 per month in rental income on 5114 Springfield Avenue.

4. On or before March 17, 2005, co-conspirator Willie G. Manley, Jr. created false W-2s and paystubs for defendant RASHIKA J. MOON showing income that defendant MOON had not earned. These documents were submitted to Equifirst Mortgage Corporation.

5. On or about March 17, 2005, co-conspirator K.F. prepared two sets of Form HUD-1 settlement statements – one for the seller that showed the agreed-upon sales price and one for Equifirst Mortgage Corporation that showed the false sales price to be \$265,000.

6. On or before March 17, 2005, co-conspirator E.B. created false invoices showing charges for repairs that were never made to the property at 5114 Springfield Avenue and supplied those invoices to co-conspirator K.F. in order to support a payment to him from part of the loan proceeds.

7. On or about March 17, 2005, defendant RASHIKA J. MOON and co-conspirators E.B., K.F., W.B., and Willie G. Manley, Jr., caused Equifirst Mortgage Corporation to approve and issue a loan in the amount of \$238,500, and to wire approximately \$241,693.86 in interstate commerce to a bank account in Pennsylvania utilized by PA/NJ Abstract, Inc., where K.F. worked as a title agent.

8. On or about March 17, 2005, co-conspirator K.F. disbursed funds to co-conspirators known and unknown to the United States Attorney, including approximately \$54,000 to co-conspirator R.F. and approximately \$70,000 to co-conspirator E.B.

**B. The December 29, 2006, BNC Mortgage Inc. Loan**

9. On or before December 29, 2006, defendant RASHIKA J. MOON and co-conspirators E.B., K.F., Willie G. Manley, Jr. and John William Polosky, caused a refinancing

mortgage loan application and supporting documents containing materially false statements to be submitted to BNC Mortgage Inc. that included, among other things, false W-2s and paystubs showing false income for defendant MOON, and approximately 27 false leases showing that defendant MOON was collecting large amounts of monthly rental income.

10. On or before December 29, 2006, co-conspirator Willie G. Manley, Jr. created false W-2s and paystubs for defendant RASHIKA J. MOON showing income that defendant MOON had not earned. These documents were submitted to BNC Mortgage Inc.

11. On or about December 29, 2006, defendant RASHIKA J. MOON and co-conspirators E.B., K.F., Willie G. Manley, Jr., and John William Polosky, caused BNC Mortgage Inc. to approve and issue a loan in the amount of \$297,500, and send approximately a \$296,323.48 check to PA/NJ Abstract, Inc., where K.F. worked as a title agent.

12. On or about December 29, 2006, unbeknownst to BNC Mortgage Inc., co-conspirator K.F. disbursed funds to co-conspirators known and unknown to the United States Attorney, including approximately \$30,121 to co-conspirator E.B.

**C. The July 15, 2008, Wells Fargo Bank FHA-Insured Loan**

13. On or before July 15, 2008, defendant RASHIKA J. MOON and co-conspirators E.B., K.F., W.B., F.C., C.B., D.D., and Willie G. Manley, Jr., through G.F., a mortgage broker known to the United States Attorney, caused an FHA mortgage loan application and supporting documents containing materially false statements to be submitted to Wells Fargo Bank that included, among other things, a false statement that 5114 Springfield Avenue would be sold by defendant MOON to D.D., a false statement that the property would be D.D.'s primary residence, false employment and employment verification for D.D., false W-2s, false paystubs, and tax returns showing false income for D.D.

14. On or about June 23, 2008, co-conspirators C.B. and D.D. signed a “gift letter” containing false statements both that D.D. was C.B.’s “niece,” and that C.B. was giving a gift of \$10,000 to D.D. in time to close the mortgage transaction for 5114 Springfield Avenue.

15. On or about June 24, 2008, co-conspirator Willie G. Manley, Jr. created false W-2s, paystubs, and tax returns for co-conspirator D.D. showing income that D.D. had not earned. These documents were submitted to PNC Mortgage and Wells Fargo Bank.

16. On or about June 24, 2008, co-conspirator W.B., while working as a mortgage broker with Carteret Mortgage Corporation, caused to be sent a 60-page facsimile in interstate commerce to G.F. at PNC Mortgage in Pennsylvania enclosing, among other things, a letter informing G.F. that co-conspirator D.D.’s mortgage application for 5114 Springfield Avenue had been accepted by FHA, the false gift letter signed by co-conspirators C.B. and D.D., and false income tax returns for D.D.

17. On or before July 15, 2008, co-conspirator K.F. created a false title insurance policy for 5114 Springfield Avenue, which was submitted to Wells Fargo Bank (who had been assigned the loan by PNC Mortgage).

18. On or about July 15, 2008, defendant RASHIKA J. MOON and co-conspirators E.B., K.F., W.B., F.C., C.B., D.D., and Willie G. Manley, Jr., caused FHA to accept the loan for FHA insurance and caused Wells Fargo Bank to approve the mortgage application for 5114 Springfield Avenue, issue a loan in the amount of \$329,824, and wire approximately \$322,740.34 in interstate commerce from Iowa to a bank account in Pennsylvania utilized by KREW, where K.F. was the title agent.

19. On or about July 16, 2008, unbeknownst to Wells Fargo Bank, co-conspirator K.F. disbursed approximately \$22,000 to himself and other funds to other

co-conspirators known and unknown to the United States Attorney, including over \$241,000 to co-conspirator E.B., who in turn disbursed funds to defendant RASHIKA J. MOON.

## **II. 4930 KINGSESSING AVENUE, PHILADELPHIA, PA**

### **A. The June 29, 2005 First Horizon Home Loan Corporation Loan**

20. On or before June 29, 2005, defendant RASHIKA J. MOON and co-conspirators E.B., K.F., W.B., and Willie G. Manley, Jr., through D.M., a mortgage broker known to the United States Attorney, caused a mortgage loan application and supporting documents containing materially false statements to be submitted to First Horizon Home Loan Corporation, a subsidiary of First Tennessee Bank, that included, among other things, a false statement that defendant MOON was the buyer of 4930 Kingsessing Avenue (when in fact the seller had agreed to sell the property to co-conspirator E.B.), a false statement that defendant MOON was employed by Foxworth, Inc., earning approximately \$1,694 per month, false W-2s and paystubs showing false income, a false statement that the sales price was approximately \$280,000 (when in fact the actual sales price was approximately \$100,000), a false real estate sales contract, and false leases showing \$3,150 in monthly rental income on the property.

21. On or before June 10, 2005, co-conspirator W.B., acting as mortgage broker, referred defendant RASHIKA J. MOON's fraudulent mortgage loan application for 4930 Kingsessing Avenue to D.M.

22. On or about June 14, 2005, defendant RASHIKA J. MOON and co-conspirators E.B., K.F., W.B., and Willie G. Manley, Jr., caused to be sent in interstate commerce a facsimile containing, among other things, a false "Standard Agreement for the Sale of Real Estate" listing a false sales price of \$280,000 for 4930 Kingsessing Avenue and false leases showing false rental income being earned by 4930 Kingsessing Avenue.

23. On or before June 29, 2005, co-conspirator Willie G. Manley, Jr. created false W-2s and paystubs for defendant RASHIKA J. MOON showing income that defendant MOON had not earned. These documents were submitted to First Horizon Home Loan Corporation.

24. On or about June 29, 2005 defendant RASHIKA J. MOON and co-conspirators E.B., K.F., W.B., and Willie G. Manley, Jr., caused First Horizon Home Loan Corporation to approve and issue a loan in the amount of \$238,000, and wire approximately \$233,840.02 in interstate commerce from First Tennessee Bank to a bank account in Pennsylvania utilized by PA/NJ Abstract, Inc., where co-conspirator K.F. worked as a title agent.

25. On or about June 29, 2005, co-conspirator K.F. disbursed funds to co-conspirators known and unknown to the United States Attorney, including approximately \$109,155 to the National Penn Bank account ending in 2275 co-owned by co-conspirators E.B. and R.F., from which further payments were made to defendant RASHIKA J. MOON and co-conspirator C.B.

**B. The April 30, 2007, Bank of America Loan**

26. On or before April 30, 2007, defendant RASHIKA J. MOON and co-conspirators E.B., K.F., F.C., Willie G. Manley, Jr., and John William Polosky, using the identity of V.W., a straw borrower known to the United States Attorney, caused a mortgage loan application and supporting documents containing materially false statements to be submitted to Bank of America that included, among other things, a false statement that 4930 Kingsessing Avenue would be sold by defendant MOON to V.W., a false statement that the property would be V.W.'s primary residence, and false W-2s and paystubs showing false income for V.W.

27. On or before April 30, 2007, co-conspirator Willie G. Manley, Jr. created

false W-2s and paystubs for V.W. showing income that V.W. had not earned. These documents were submitted to Bank of America.

28. On or before April 30, 2007, co-conspirator F.C. provided a falsely-inflated appraisal for 4930 Kingsessing Avenue that overstated the actual value of 4930 Kingsessing Avenue, which was submitted to Bank of America.

29. On or before April 30, 2007, co-conspirator E.B. created false invoices showing charges for repairs that were never made to the property at 4930 Kingsessing Avenue and supplied those invoices to co-conspirator K.F. in order to support a payment to him of part of the loan proceeds.

30. On or about April 30, 2007, defendant RASHIKA J. MOON and co-conspirators E.B., K.F., F.C., Willie G. Manley, Jr., and John William Polosky, caused Bank of America to approve and issue a loan in the amount of \$355,000, and wire approximately \$354,039.32 in interstate commerce to a bank account in Delaware utilized by PA/NJ Abstract, Inc., where co-conspirator K.F. worked as a title agent.

31. On or about April 30, 2007, unbeknownst to Bank of America, co-conspirator K.F. disbursed funds to co-conspirators known and unknown to the United States Attorney, including approximately \$46,843.28 to the National Penn Bank account ending in 2275 co-owned by co-conspirators E.B. and R.F., from which approximately \$15,500 was disbursed to defendant RASHIKA J. MOON.

### **III. 6366 SHERMAN STREET, PHILADELPHIA, PA**

32. Sometime prior to June 15, 2006, co-conspirator F.C., acting as a real estate agent, approached the seller of 6366 Sherman Street, informed the seller that she had found a buyer for the property, and induced the seller to sell the property to her buyer.

33. On or about June 15, 2006, co-conspirator F.C. caused a \$47,000 official check to be issued by Sovereign Bank and made payable to 21<sup>st</sup> Century Abstract Company, which co-conspirator K.F. falsely reflected in 21<sup>st</sup> Century Abstract's records as having been provided by defendant RASHIKA J. MOON.

34. On or about June 15, 2006, co-conspirator R.F. caused National Penn Bank to issue a \$40,000 official check, drawn from a joint account with E.B. ending in 2275, made payable to 21<sup>st</sup> Century Abstract Company, which co-conspirator K.F. caused to be reflected in 21<sup>st</sup> Century Abstract's records as having been provided by defendant RASHIKA J. MOON.

35. On or about June 15, 2006, co-conspirator K.F. conducted a settlement of the sale of 6366 Sherman Street and prepared a Form HUD-1 settlement statement for the seller of 6366 Sherman Street that showed the sales price to be \$140,000, the buyer to be defendant RASHIKA J. MOON, and a payment of \$75,645.16 to be due to the seller. This HUD-1 was signed by co-conspirator E.B. on behalf of defendant RASHIKA J. MOON.

36. On or about June 15, 2006, co-conspirator K.F. caused a check in the amount of approximately \$75,645.16 to be issued by 21<sup>st</sup> Century Abstract Company made payable to the seller of 6366 Sherman Street.

37. On or about June 28, 2006, co-conspirator E.B. caused a \$900 check made payable to 21<sup>st</sup> Century Abstract Company to be written from National Penn Bank account ending in 2275.

38. On or about June 30, 2006, defendant RASHIKA J. MOON and co-conspirators E.B., K.F., R.F., F.C., and Willie G. Manley, Jr., caused a mortgage loan application and supporting documents containing materially false statements to be submitted to Long Beach

Mortgage, a division of Washington Mutual Bank, that included, among other things, a false statement that the sales price of 6366 Sherman Street was approximately \$250,000 (when in fact the actual sales price was approximately \$140,000), a false statement that the property would be defendant MOON's primary residence, false employment information for defendant MOON, a false statement that defendant MOON earned \$11,601 per month, a false real estate sales contract, false W-2s and paystubs showing false income for defendant MOON, false leases showing false monthly rental income, and that failed to disclose that the actual sale of 6366 Sherman Street to defendant MOON had already occurred on June 15, 2006.

39. On or about June 30, 2006, co-conspirator R.F., acting as mortgage broker, submitted and caused to be submitted to Long Beach Mortgage defendant RASHIKA J. MOON's fraudulent mortgage loan application for 6366 Sherman Street.

40. On or before July 3, 2006, co-conspirator F.C. provided a falsely-inflated appraisal for 6366 Sherman Street, which was submitted to Long Beach Mortgage.

41. On or before July 3, 2006, co-conspirator Willie G. Manley, Jr. created false W-2s and paystubs for defendant RASHIKA J. MOON showing income that defendant MOON had not earned. These documents were submitted to Long Beach Mortgage.

42. On or about July 3, 2006, co-conspirator K.F. prepared a false Form HUD-1 settlement statement for Long Beach Mortgage that showed the sales price to be \$250,000.

43. On or about July 3, 2006, defendant RASHIKA J. MOON and co-conspirators E.B., K.F., R.F., F.C., and Willie G. Manley, Jr., caused Washington Mutual Bank, through its Long Beach Mortgage division, to approve and issue two loans in the amounts of \$200,000 (first mortgage) and \$50,000 (second mortgage), and wire approximately \$201,071.18 and approximately \$49,680.73, respectively, in interstate commerce from California to a bank

account in Pennsylvania utilized by 21<sup>st</sup> Century Abstract Company, where co-conspirator K.F. worked as a title agent.

44. On and after July 3, 2006, unbeknownst to Washington Mutual Bank, co-conspirator K.F. disbursed funds to co-conspirators known and unknown to the United States Attorney, including approximately \$178,333.53 to a company controlled by co-conspirator R.F.

**IV. 11101 ROYAL LANE, PROVIDENCE FORGE, VA**

45. On or before February 13, 2007, defendant RASHIKA J. MOON and co-conspirators E.B., W.B., and Willie G. Manley, Jr., through D.M., a mortgage broker known to the United States Attorney, caused a mortgage loan application and supporting documents containing materially false statements to be submitted to Saxon Mortgage, Inc. that included, among other things, a false address for defendant MOON in Virginia (when in fact defendant MOON lived in New Jersey), a false statement that 11101 Royal Lane would be defendant MOON's primary residence (when in fact the property was being used as co-conspirator W.B.'s primary residence), false employment and employment verification for defendant MOON, false paystubs showing false income, and false leases showing false monthly rental income.

46. On or before February 13, 2007, co-conspirator W.B., acting as mortgage broker, referred defendant RASHIKA J. MOON's fraudulent mortgage loan application for 11101 Royal Lane to D.M.

47. On or before February 13, 2007, co-conspirator Willie G. Manley, Jr. created false paystubs for defendant MOON showing income that defendant MOON had not earned. These documents were submitted to Saxon Mortgage, Inc.

48. On or about February 13, 2007, defendant RASHIKA J. MOON and co-conspirators E.B., W.B., and Willie G. Manley, Jr., caused Saxon Mortgage, Inc. to approve and

issue a loan in the amount of \$519,000, and wire approximately \$523,722.12 to a bank account in Virginia utilized by the title company that handled the closing

All in violation of Title 18, United States Code, Section 371.

**COUNT TWO**

**THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:**

1. Paragraphs 1 through 10 and 12 through 24, and Overt Acts 1 through 19, of Count One are incorporated here.
2. On or about July 15, 2008, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendant

**RASHIKA J. MOON**

together and with E.B., K.F., W.B., F.C., C.B., D.D., and Willie G. Manley, Jr., charged elsewhere, and others known and unknown to the United States Attorney, knowingly made and caused to be made to Wells Fargo Bank, and aided and abetted the making of, a false statement for the purpose of influencing the actions of the Department of Housing and Urban Development upon a loan accepted by the Department of Housing and Urban Development for insurance, that is, a \$329,824 Wells Fargo Bank mortgage for 5114 Springfield Avenue, Philadelphia, PA, in that defendant MOON, together and with E.B., K.F., F.C., C.B., D.D. and Willie G. Manley, Jr., caused to be submitted to Wells Fargo Bank a false loan application that represented that D.D. earned \$9,380 per month, and false tax returns that represented that D.D. had \$111,627 in adjusted gross income for 2007 and \$85,500 in adjusted gross income for 2006, when, as defendant MOON knew, the representations were not true.

In violation of Title 18, United States Code, Section 1010 and 2.

**COUNT THREE**

**THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:**

1. Paragraphs 1 through 10 and 12 through 24, and Overt Acts 20 through 31, of Count One are incorporated here.
2. On or about April 30, 2007, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendant

**RASHIKA J. MOON**

together and with E.B., K.F., F.C., Willie G. Manley, Jr., charged elsewhere, and John William Polosky, charged elsewhere, and others known and unknown to the United States Attorney, knowingly made and caused to be made to Bank of America, and aided and abetted the making of, a false statement for the purpose of influencing the actions of Bank of America, upon a loan, that is, a \$355,000 mortgage for 4930 Kingsessing Avenue, Philadelphia, PA, in that defendant MOON together and with E.B., K.F., F.C., Willie G. Manley, Jr., and John William Polosky, caused to be submitted to Bank of America a false loan application that represented that the property would be V.W.'s primary residence and that V.W. earned \$6,950 per month, and false W-2s that represented that V.W. had earned \$52,500.50 in income from Medical Systems in 2006 and \$49,996 in income from Medical Systems in 2005, when, as defendant MOON knew, the representations were not true.

All in violation of Title 18, United States Code, Sections 1014 and 2.

## NOTICE OF FORFEITURE

### THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

1. As a result of the violations of Title 18, United States Code, Sections 371 and 1014, as set forth in this information, defendant

#### **RASHIKA J. MOON**

shall forfeit to the United States of America any property that constitutes, or is derived from, proceeds obtained directly or indirectly from the commission of such offenses, including, but not limited to, the sum of \$1,767,942.

2. If any of the property subject to forfeiture, 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 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 28, United States Code, Section 2461(c), and Title 18, United States Code, Section 982(b), both incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant(s) up to the value of the property subject to forfeiture.

All pursuant to Title 18, United States Code, Sections 981(a)(1)(c) and 982(a)(2)  
and Title 28, United States Code, Section 2461.

  
ZANE DAVID MEMEGER  
UNITED STATES ATTORNEY