

The Conspiracy

2. From in or about December 2007 through in or about May 2008, in the District of New Jersey and elsewhere, defendants

RONNIE SINGLETON and
MICHAEL WOODRUFF

did knowingly and intentionally conspire and agree with each other and with others to devise a scheme and artifice to defraud, and to obtain money and property by means of materially false and fraudulent pretenses, representations and promises, and, for the purpose of executing such scheme and artifice, to transmit and cause to be transmitted by means of wire communications in interstate commerce certain writings, signs, signals, pictures, and sounds, contrary to Title 18, United States Code, Section 1343.

Object of the Conspiracy

3. The object of the conspiracy was to obtain money and property from the Investors by providing false and misleading information to the Investors while posing as loan brokers while engaging in or causing wire communications in interstate commerce.

Manner and Means of the Conspiracy

4. It was a part of the conspiracy that defendants SINGLETON and WOODRUFF were introduced to R.K. through the internet and communicated with him by telephone and email.

5. It was a further part of the conspiracy that defendant SINGLETON encouraged R.K. to bring Investors to him by falsely representing to R.K. that he could provide financing for the Investors' real estate development projects through a "European system of financing" that involved leasing financial instruments.

6. It was a further part of the conspiracy that defendant SINGLETON required that any potential Investors provide money up front to pay for "due diligence fees" before he would provide them with financing.

7. It was a further part of the conspiracy that defendant WOODRUFF agreed to review real estate development projects for R.K., and Investors through R.K., to determine whether he and defendant SINGLETON would secure financing for them.

8. It was a further part of the conspiracy that, in or about December 2007, R.K., relying on defendant SINGLETON's false representations, described to the Investors, including individuals located in New Jersey and elsewhere, the proposed financing opportunity that defendants SINGLETON and WOODRUFF had presented to R.K.

9. It was a further part of the conspiracy that, in reliance on defendant SINGLETON's false representations that R.K. had presented, several Investors sent money to R.K. via interstate wire transfer as follows:

- a. On or about December 21 and December 24, 2007, an Investor with the initials S.J. sent three wire transfers totaling approximately \$150,000 from a bank account in New York to R.K.'s business account in Arizona;
- b. On or about January 17, 2008, two Investors with the initials A.C. and J.H. sent a wire transfer of approximately \$100,000 from a bank account in New York to R.K.'s business account in Arizona;
- c. On or about January 25, 2008, an Investor with the initials K.T. sent a wire transfer of approximately \$200,000 from a bank account in New York to R.K.'s business account in Arizona;
- d. On or about January 30, 2008, a financial advisor with the initials W.J., on behalf of two clients who were Investors, sent a wire transfer of approximately \$300,000 from a bank account in New Jersey to R.K.'s business account in Arizona;

10. It was a further part of the conspiracy that, in reliance on the false representations of defendants SINGLETON and WOODRUFF, R.K. sent Investors' money to defendant SINGLETON's business account in the name of Wonder World, Inc., as follows:

- a. On or about December 24, 2007, R.K. sent a wire transfer of approximately \$80,000 from an account in Arizona to defendant SINGLETON's business account in Georgia;
- b. On or about December 26, 2007, R.K. sent a wire transfer of approximately \$50,000 from an account in Arizona to defendant SINGLETON's business account in Georgia;
- c. On or about January 22, 2008, R.K. sent a wire transfer of approximately \$90,000 from an account in Arizona to defendant SINGLETON's business account in Georgia;
- d. On or about February 1, 2008, R.K. sent a wire transfer of approximately \$450,000 from an account in Arizona to defendant SINGLETON's business account in Georgia;
- e. On or about February 7, 2008, R.K. sent a wire transfer of approximately \$90,000 from an account in Arizona to defendant SINGLETON's business account in Georgia.

11. It was further a part of the conspiracy that defendant SINGLETON shared the illicit proceeds of the scheme with defendant WOODRUFF by making wire transfers including but not limited to:

- a. On or about February 1, 2008, defendant SINGLETON sent a wire transfer of approximately \$160,000 from his business account in Georgia to an account that defendant WOODRUFF held at a bank in Texas;
- b. On or about February 27, 2008, defendant SINGLETON sent a wire transfer of approximately \$100,000 from his business account in Georgia to a business account that defendant WOODRUFF held in the name of CCM Group at a bank in Texas;

c. In total, defendant SINGLETON sent approximately \$360,000 to defendant WOODRUFF.

12. It was further a part of the conspiracy that defendants SINGLETON and WOODRUFF never obtained the promised financing for the Investors' real estate projects and instead used the Investors' money for their own benefit.

13. It was further a part of the conspiracy that in or about April 2008, after defendants SINGLETON and WOODRUFF had failed to obtain the promised financing, R.K. sought the return of the Investors' money from them.

14. It was further a part of the conspiracy that from in or about April 2008 through in or about August 2008, R.K. engaged in repeated email correspondence with defendants SINGLETON and WOODRUFF seeking the return of the Investors' money.

15. It was further a part of the conspiracy that defendants SINGLETON and WOODRUFF falsely claimed that the financing was imminent and then later repeatedly promised R.K. that they would return the Investors' money, but failed to do so.

In violation of Title 18, United States Code, Section 1349.

COUNT TWO
(Wire Fraud)

1. Paragraphs 1 and 4 through 15 of Count One of this Indictment are realleged as if set forth in full herein.

2. From at least as early as in or about December 2007 through in or about May 2008, in the District of New Jersey and elsewhere, defendants

RONNIE SINGLETON and
MICHAEL WOODRUFF

did knowingly and intentionally devise and intend to devise a scheme and artifice to defraud and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises.

3. On or about January 30, 2008, for the purpose of executing the scheme and artifice described above, and attempting to do so, in the District of New Jersey and elsewhere, defendants

RONNIE SINGLETON and
MICHAEL WOODRUFF

did knowingly and intentionally transmit and cause to be transmitted by means of wire communications in interstate commerce a wire transfer in the amount of \$300,000 from the business bank account of financial advisor W.J. in New Jersey to R.K.'s business account in Arizona.

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

FORFEITURE ALLEGATION

1. The allegations contained in this Indictment are hereby realleged and incorporated by reference for the purpose of noticing forfeiture pursuant to Title 18, United States Code, Section 981(a)(1)(c) and Title 28, United States Code, Section 2461(c).

2. The United States hereby gives notice to the defendant charged in Counts One and Two that, upon his conviction of any such offense, the government will seek forfeiture in accordance with Title 18, United States Code, Section 981(a)(1)(c) and Title 28, United States Code, Section 2461(c), which requires any person convicted of such offenses to forfeit any property constituting or derived from proceeds obtained directly or indirectly as a result of such offenses.

3. If any of the above-described forfeitable property, 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 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of such defendant up to the value of the forfeitable property described in paragraph 2.

A TRUE BILL



PAUL J. FISHMAN
UNITED STATES ATTORNEY

CASE NUMBER: 13-64

**United States District Court
District of New Jersey**

UNITED STATES OF AMERICA

v.

RONNIE SINGLETON AND MICHAEL WOODRUFF

INDICTMENT FOR
18 U.S.C. § 1343, 1349, and 2

A True Bill.

PAUL J. FISHMAN
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NEWARK, NEW JERSEY

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