2009R01435/HB

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

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| UNITED STATES OF AMERICA | : | Crim. No. 10-441 (GEB) |
| v. | : | |
| | : | 18 U.S.C. §§ 1341 and 2 |
| JOSEPH NEDOMATSKY, a/k/a "Joseph Leroy" | : | |

INFORMATION

The defendant having waived in open court prosecution by Indictment, the United States Attorney for the District of New Jersey charges:

1. At all times relevant to this Information:

a. L.A.M. Associates was a business that purported to offer medical insurance and investment services. L.A.M. Associates maintained offices or operations in Haddonfield, New Jersey, Phillipsburg, New Jersey, Saylorsburg, Pennsylvania, and Cresco, Pennsylvania.

b. Defendant JOSEPH NEDOMATSKY, a/k/a "Joseph Leroy," was the owner and operator of L.A.M. Associates.

**THE SCHEME AND ARTIFICE TO DEFRAUD**

2. From in or about December 1998 to in or about June 2007, in Warren and Camden Counties, in the District of New Jersey, and elsewhere, defendant

JOSEPH NEDOMATSKY
a/k/a "Joseph Leroy"

knowingly and willfully did devise and intend to devise a scheme and artifice to defraud investors of L.A.M. Associates of money and property by means of materially false and fraudulent pretenses, representations and promises.

3. The primary object of the scheme and artifice was to fraudulently induce and cause individuals to invest money in L.A.M. Associates, which money defendant JOSEPH NEDOMATSKY used for personal expenses and the expenses of others.

**THE MEANS AND METHODS OF THE SCHEME TO DEFRAUD**

4. It was part of the scheme and artifice to defraud that defendant JOSEPH NEDOMATSKY placed advertisements for L.A.M. Associates in a faith-based magazine offering a "guaranteed minimum 12% fixed annual investment rate" for a minimum investment of $5,000 for a 60 month term.

5. It was further part of the scheme and artifice to defraud that defendant JOSEPH NEDOMATSKY instructed investors to send checks representing investments in L.A.M. Associates to, among other places, a post office box in Haddonfield, New Jersey.

6. It was further part of the scheme and artifice to defraud that defendant JOSEPH NEDOMATSKY directed another individual, who had been retained by defendant JOSEPH NEDOMATSKY to provide accounting services for L.A.M. Associates, to retrieve those checks and deposit them in a bank account in Cherry Hill, New Jersey.

7. It was further part of the scheme and artifice to defraud that upon receipt of an investment, defendant JOSEPH NEDOMATSKY sent a letter to the investor confirming that the investment was received and setting forth the terms of the investment. In such letters, defendant JOSEPH NEDOMATSKY represented to investors, among other things, that their investments were loans to L.A.M. Associates for a specified

period of time with a specific interest rate, that the investors would not receive an annual statement regarding their investments, and that the principal and interest would be paid at the end of the term of the loan. Such letters also included schedules listing the projected growth of the investors' investments pursuant to the represented interest rate. Defendant JOSEPH NEDOMATSKY also represented to investors that a withdrawal of their investment may be subject to an interest penalty.

8. It was further part of the scheme and artifice to defraud that defendant JOSEPH NEDOMATSKY falsely represented to L.A.M. Associates investors that the money would be invested in, among other things, securities and real estate tax liens.

9. It was further part of the scheme and artifice to defraud that defendant JOSEPH NEDOMATSKY used the money sent to him by investors for, among other things, his personal expenses, including credit card obligations, and the benefit of other individuals.

10. It was further part of the scheme and artifice to defraud that defendant JOSEPH NEDOMATSKY did not return to investors the principal of their investments and the interest promised to them at the time of their investments.

11. As a result of the scheme and artifice to defraud, defendant JOSEPH NEDOMATSKY defrauded investors of L.A.M. Associates of approximately $800,000.

12. For the purpose of executing and attempting to execute this scheme and artifice to defraud, defendant

JOSEPH NEDOMATSKY
a/k/a "Joseph Leroy"

did knowingly and willfully cause to be placed in a post office and authorized depository for mail to be delivered by the United States Postal Service certain mail matter, namely, on or about May 20, 2005, a letter from B.B. in Baltimore, Maryland, containing a check in the amount of $1,500 made payable to L.A.M. Associates, and addressed to L.A.M. Associates, Haddonfield, New Jersey, representing an investment in L.A.M. Associates.

In violation of Title 18, United States Code, Section 1341 and Title 18, United States Code, Section 2.

PAUL J. FISHMAN
United States Attorney

CASE NUMBER: _____

# United States District Court
# District of New Jersey

UNITED STATES OF AMERICA

v.

JOSEPH NEDOMATSKY
a/k/a "Joseph Leroy"

# INFORMATION FOR

18 U.S.C. §§ 1341 and 2

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