

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon.  
 :  
 v. : Crim. No. 10-  
 :  
 MARIA LOURDES SOUSA : 18 U.S.C. § 1349

I N F O R M A T I O N

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. Defendant MARIA LOURDES SOUSA was a resident of New Jersey and worked in the healthcare industry.
  - b. The cooperating witness referred to herein ("CW") was a loan officer with a New Jersey mortgage company (the "Mortgage Company").
  - c. CW used a Yahoo! email account in New Jersey to communicate with defendant MARIA LOURDES SOUSA and her co-conspirators. These emails necessarily were transmitted in interstate commerce because once a user submits a connection request to website servers such as Yahoo!'s or data is transmitted from those website servers back to the user, the data has traveled in interstate commerce. All emails to or from CW described herein pertain to this Yahoo! email account.

2. From in or about August 2009 through in or about February 2010, in Essex County, in the District of New Jersey, and elsewhere, defendant

MARIA LOURDES SOUSA

did knowingly and intentionally conspire and agree 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 18 U.S.C. § 1343.

Object of the Conspiracy

3. It was the object of the conspiracy to obtain mortgage loans through fraudulent means to finance real estate transactions in and near Newark, New Jersey and elsewhere.

Manner and Means of the Conspiracy

4. It was part of the conspiracy that in order to obtain mortgage loans, defendant MARIA LOURDES SOUSA and others caused to be submitted materially false and fraudulent mortgage loan applications and supporting documents to the Mortgage Company while engaging in or causing wire communications in interstate commerce, including email exchanges with CW.

5. It was further part of the conspiracy that, on or about October 22, 2009, defendant MARIA LOURDES SOUSA met with mortgage consultant Edivaldo Dos Santos ("Dos Santos") and CW in Newark, New Jersey. During the meeting, defendant MARIA LOURDES SOUSA told CW that she made false pay stubs, and that her sister Rosa Damasceno ("Damasceno") made false Forms W-2 and tax returns. Defendant MARIA LOURDES SOUSA told CW that CW could order all the aforementioned false documents through defendant MARIA LOURDES SOUSA, who would pass along the relevant portion of the order to Damasceno. Defendant MARIA LOURDES SOUSA told CW that she charged \$40 per pay stub.

6. It was further part of the conspiracy that, on or about November 10, 2009, defendant MARIA LOURDES SOUSA received an email from CW ordering four false pay stubs from defendant MARIA LOURDES SOUSA and two false Forms W-2 from Damasceno for an individual named Ricardo Muniz ("Muniz"), who was trying to qualify for a mortgage loan from the Mortgage Company. Defendant MARIA LOURDES SOUSA subsequently confirmed the details of the order with CW by telephone.

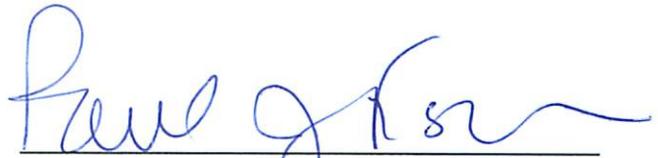
7. It was further part of the conspiracy that defendant MARIA LOURDES SOUSA contacted CW and told him that the pay stubs for Muniz were complete. Defendant MARIA LOURDES SOUSA told CW that she would leave the pay stubs that she had prepared with Damasceno and that CW could pick up the documents from Damasceno

and pay Damasceno the amount due to defendant MARIA LOURDES SOUSA.

8. It was further part of the conspiracy that, on or about November 13, 2009, at defendant MARIA LOURDES SOUSA's direction, CW went to the office of the company owned by Damasceno, in Newark, New Jersey, to pick up the false documents that were prepared by defendant MARIA LOURDES SOUSA and Damasceno. An employee of Damasceno provided CW with the false documents, for which CW paid the employee \$220.

9. The five pay stubs created by defendant MARIA LOURDES SOUSA each showed a false and inflated income for Muniz, in accordance with the instructions CW had given defendant MARIA LOURDES SOUSA on or about November 10, 2009.

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

  
\_\_\_\_\_  
PAUL J. FISHMAN  
United States Attorney

CASE NUMBER: \_\_\_\_\_

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**UNITED STATES OF AMERICA**

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**INFORMATION FOR**

**18 U.S.C. § 1349**

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**PAUL J. FISHMAN**

*UNITED STATES ATTORNEY, NEWARK, NEW JERSEY*

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