

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

**UNITED STATES OF AMERICA** : **CRIMINAL NO. 10-\_\_\_\_\_**  
**v.** : **DATE FILED: \_\_\_\_\_**  
**CECELIA NEDD** : **VIOLATION:**  
**18 U.S.C. § 1343 (wire fraud - 1 count )**

---

**INFORMATION**

**COUNT ONE**

**THE UNITED STATES ATTORNEY CHARGES THAT:**

**THE SCHEME**

1. From at least in or about 2007, through in or about 2008, defendant

**CECELIA NEDD**

devised and intended to devise a scheme to defraud lenders and to obtain money and property by means of false and fraudulent pretenses, representations and promises.

**MANNER AND MEANS**

It was part of the scheme that:

2. Defendant CECELIA NEDD prepared and assisted in preparing fraudulent documents in support of loan applications.

3. In or about May 2007, in Philadelphia, Pennsylvania, during an undercover operation in which an undercover agent posed as a purchaser of real estate, defendant CECELIA NEDD prepared a fraudulent letter from Wachovia Bank, which stated that \$44,500.69 was on deposit in a Wachovia Bank account in the name of "R.M." Defendant NEDD did not work at Wachovia Bank at the time she prepared the letter. Defendant NEDD further, knew that these funds were not on deposit in the Wachovia Bank account and that the

fraudulently prepared letter was intended for “R.M.” to submit when applying for a mortgage loan.

4. In or about August 2008, in Philadelphia, Pennsylvania, defendant CECELIA NEDD assisted in preparing and obtaining false pay stubs from Primetime Mortgage Services for herself. Defendant NEDD was not employed at Primetime Mortgage Services as indicated on the false pay stubs. Defendant NEDD submitted the false pay stubs in support of a loan application in her purchase of a 2004 BMW from a car dealership in Newark, Delaware.

5. In or about November 2008, in Philadelphia, Pennsylvania, defendant CECELIA NEDD assisted in preparing and obtaining false pay stubs from Primetime Mortgage Services for “Y.W.” Defendant NEDD knew that “Y.W.” was not employed at Primetime Mortgage Services as indicated on the false pay stubs. Defendant NEDD gave the false pay stubs to “Y.W.,” knowing that “Y.W.” was submitting the false pay stubs in support of a loan application in “Y.W.’s” purchase of a 2006 Mercedes Benz from a car dealership in Newark, Delaware.

6. On or about August 12, 2008, in the Eastern District of Pennsylvania, and elsewhere, defendant

**CECELIA NEDD,**

for the purpose of executing the scheme described above, and attempting to do so, caused to be transmitted by means of wire communication in interstate commerce signals and sounds, that is, the fraudulent loan application, including the false pay stubs, for defendant NEDD’s purchase of the 2004 BMW, was sent by facsimile from the car dealership in Delaware, to AmeriCredit Financial Services, Inc., in Texas.

All in violation of Title 18, United States Code, Section 1343.

---

**ZANE DAVID MEMEGER**  
**United States Attorney**