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DISTRICT OF UTAH
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IN THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH, CENTRAL DIVISION

UNITED STATES OF AMERICA, : Case No.
 :
 Plaintiff, :
 :
 v. : FELONY INFORMATION
 :
 COREY DAVID NANCE, :
 :
 Defendant. : Viol. 18 U.S.C. § 1343 (Wire Fraud)
 :
 :

The United States Attorney charges:

1. At all times material to this Felony Information, the defendant was a resident of Salt Lake County, Utah, and conducted business under the following names, among others: (a) C.N.C. Development, L.C.; (b) J.S. Properties, L.L.C.; and (c) Drexel Goldman Funding, Inc.
2. Beginning sometime prior to May 2002 to on or about September 2003, in the Central Division of the District of Utah,

COREY DAVID NANCE,

defendant herein, devised and executed a scheme and artifice to defraud and to obtain money and property from mortgage companies and lending institutions (collectively, "victim lenders") by

means of false and fraudulent pretenses, representations, and promises, and transmitted and caused to be transmitted, by means of wire communications in interstate commerce, writings, signs, signals, pictures, and sounds, for the purpose of executing such scheme and artifice.

3. It was part of the artifice and scheme to defraud that the defendant purchased empty lots in Salt Lake and Summit County in the name of one of his businesses.

4. It was further part of the artifice and scheme to defraud that the defendant recruited straw purchasers to act as borrowers on loan applications and supporting documents submitted by the defendant to Equity Federal, L.L.C. ("Equity"), a mortgage broker. Defendant paid straw purchasers a fee for the use of their names and financial information. Equity brokered such loan packages to various victim lenders.

5. It was further part of the artifice and scheme to defraud that the defendant, at times, altered and falsified the following loan and supporting documents, among others:

- a. Uniform Residential Loan Application - Defendant prepared and completed all loan applications on behalf of the straw borrowers. Defendant misrepresented the straw borrower's income under the "Monthly Income and Combined Housing Expense Information" section of the application income knowing full well that the income figure was significantly overstated. Defendant also misrepresented under the "Declarations" section of the application that the straw borrower intended to "occupy the property as [his or her] primary residence" knowing full well there was no residence on the subject property to occupy.
- b. Uniform Residential Appraisal Report - Defendant, or a licensed appraiser acting in concert with the defendant, prepared and completed an appraisal report which significantly overstated the fair market value of the subject property. Other misrepresentations contained in the appraisal report included overstated "comparable" properties in the near area, fictitious floor plans, and fictitious photographs of a residence on the subject property. Defendant made and caused each of the foregoing misrepresentations knowing full well there was no residence on the subject property.

- c. Borrower Financial Information - Defendant obtained bank account statements from straw borrowers and altered such statements to reflect fictitious transactions and balances, knowing full well that such altered information significantly overstated the straw borrower's financial status.

6. It was further part of the artifice and scheme to defraud that the defendant provided the above loan and supporting documents to Equity for forwarding and submission to a victim lender. Relying on the false and fraudulent information described above, the victim lenders approved loans for the various straw borrowers. Loan proceeds were thereafter forwarded from the straw borrowers to the defendant for his own personal use and benefit and to which the defendant was not entitled.

COUNTS 1 AND 2
18 U.S.C. § 1343
(Wire Fraud)

7. On or about each of the dates identified below, in the Central Division of the District of Utah,

COREY DAVID NANCE,


defendant herein, knowingly and willfully, for the purpose of executing a scheme and artifice to defraud and to obtain money by means of false and fraudulent pretenses, representations, and promises and attempting to do so, transmitted and caused to be transmitted by means of wire communication in interstate commerce, writings, signs, signals, pictures and sounds, resulting in straw borrowers and the defendant receiving proceeds from victim lenders to which they were not entitled. Defendant executed and caused the following acts, among others, in furtherance of the scheme to defraud the victim lenders:

Count	Date of Wire Transmission	Sender of Wire Transmission	Recipient of Wire Transmission	Purpose of Wire Transfer
1	08/29/02	Equity (Salt Lake City, UT)	GreenPoint Mortgage Funding, Inc. (Denver, CO)	provide title insurance information for straw borrower 1's loan application
2	06/02/03	Equity (Salt Lake City, UT)	Wachovia Mortgage Corporation (Denver, CO)	provide title insurance information for straw borrower 2's loan application

All in violation of 18 U.S.C. § 1343.

DATED this 11th day of May, 2004.

PAUL M. WARNER
United States Attorney



MARK Y. HIRATA
Assistant United States Attorney