

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,	:	CRIMINAL NO. 07-335 (RBW)
	:	<b>UNDER SEAL</b>
v.	:	VIOLATION:
<b>ROBIN LEWIS-IVY,</b>	:	18 U.S.C. § 371
<b>Defendant.</b>	:	(Conspiracy to Commit Wire Fraud)
	:	

**SUPERSEDING INFORMATION**

The United States Attorney charges that:

**COUNT ONE**

\_\_\_\_\_ Between in or about October, 2005 and On or about April, 2007, within the District of Columbia, Maryland, and elsewhere, **ROBIN LEWIS-IVY**, did knowingly and willfully combine, conspire, confederate and agree with other persons both known and unknown to the United States, to commit offenses against the United States, that is, wire fraud, accomplished by engaging in a scheme to defraud and to obtain money and property by means of false and fraudulent pretenses, representations, and promises, and the purpose of executing and attempting to execute the scheme to defraud, willfully causing to be transmitted wire communications in interstate commerce, in violation of Title 18, United States Code, Section 1343.

**MANNER AND MEANS OF THE CONSPIRACY**

1. It was part of the conspiracy that, beginning at least as early as 2005, **ROBIN LEWIS-IVY** and her co-conspirators identified certain houses that they wanted to purchase in the District of Columbia and Maryland, and took steps to prepare fraudulent documents, such as fraudulent Internal Revenue Service forms W-2, and forged pay stubs, so that it would falsely appear to mortgage lenders, and title attorneys, that the prospective buyer of that property made an income

sufficient to qualify for a home loan in amount at least as high as the purchase price.

2. It was part of the conspiracy that the members of the conspiracy would thereafter complete loan applications that included false employment and income information, well-knowing that such applications would be sent via facsimile or electronic mail to prospective lenders.

3. It was part of the conspiracy that the members of the conspiracy would then submit these fraudulent loan applications via facsimile and/or electronic mail to various lenders, including but not limited to Fremont Investment and Loan, and WMC Mortgage for the purpose of securing a home loan.

4. It was also part of the conspiracy that the members of the conspiracy would sometimes use straw-purchasers, that is, purchasers in name only, and stolen identities, that is the personal identifiers of innocent victims, in order to conceal the fact that co-conspirator **C.M.D.** was the actual purchaser of the home, to ensure that the loan would be extended, and further to ensure that the scheme would not be detected.

#### OVERT ACTS

In furtherance of the conspiracy, and to effect the illegal objects of thereof, **ROBIN LEWIS-IVY** and her co-conspirators committed certain overt acts between October 2004 and April 2007, including but not limited to the following:

- (a) In or about November and December 2005, **ROBIN LEWIS-IVY** drove around Washington, DC, to look at and identify properties that her co-conspirator, C.M.D., and to view a property that members of the conspiracy had recently acquired through fraud.

- (b) On or about February 10, 2006, in the District of Columbia, **ROBIN LEWIS-IVY** and her co-conspirator, C.M.D., provided false documents to M.M., a co-conspirator and straw-purchaser for the property located at XXXX XXXXX XXXXXXXXXXX XXXXXX, XX, XXXXXXXXXXXXX, XX, so that M.M. could make it appear to a mortgage lender that he had income sufficient to afford a home loan, and **ROBIN LEWIS-IVY** and C.M.D. knew that M.M.'s loan application would be faxed from Maryland to Fremont Investment and Loan in Brea, California.
- (c) In or about January and February, 2006, **ROBIN LEWIS-IVY** drove around Washington, DC, to look at and identify properties that her co-conspirator might purchase, including the property located on XXXXX XXXXXXXXXXX XXXXXXX.
- (d) In or about April 2006, **ROBIN LEWIS-IVY** and her co-conspirator, C.M.D., provided false documents to M.M., a co-conspirator and straw-purchaser for the property located at XXXX XXXXX XXXXXXXXXXX XXXXXXX, XX, XXXXXXXXXXXXX, XX, loan application would be faxed from Maryland to a lender in another state.
- (e) In or about April 2006, **ROBIN LEWIS-IVY** and her co-conspirator, C.M.D., provided false documents to T.T., a co-conspirator and straw purchaser, so that T.T. could make it appear to a mortgage lender that he had sufficient income to afford a home loan for the property located at XXXX XX<sup>XX</sup> XXXXXXX, XX, XXXXXXXXXXXXX, XX.

JURISDICTION AND VENUE

The combination and conspiracy charged in Count One of this Information was carried out in the District of Columbia, Maryland and elsewhere within the five years preceding the filing of this Information.

**(Conspiracy to Commit Wire Fraud**, in violation of Title 18, United States Code, Section 371)

NOTICE OF FORFEITURE

As a result of her conviction for conspiracy to commit wire fraud as set forth in Count I of this Information, the defendant, ROBIN LEWIS-IVY, shall forfeit to the United States, pursuant to 18 U.S.C. § 981(a)(1)(C) (as incorporated by 28 U.S.C. § 2461(c)), the following property which constitutes or is derived from proceeds obtained directly or indirectly as a result of the said violation:

Money Judgment: \$289,700.00 which amount represents a sum of money equal to the amount of money constituting, or derived from, proceeds obtained, directly or indirectly, as the result of the defendant's commission of the federal conspiracy offense, in violation of 18 U.S.C. § 371.

Pursuant to 21 U.S.C. § 853(p), as incorporated by Title 18, United States Code, Section 982(b), the defendant shall forfeit substitute property, up to the value of the amount described above, if, by any act or omission of said defendant, the property identified above as subject to forfeiture:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred, 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.

All in accordance with 18 U.S.C. § 981(a)(1) and 28 U.S.C. § 2461 (incorporating 18 U.S.C. § 981(a)(1)) and Rule 32.2(a), Federal Rules of Criminal Procedure.

(Criminal Forfeiture pursuant to Title 18, United States Code, Sections 981 and 982, Title 28 United States Code, Section 2461, and Fed. R. Crim. P. 32.2(b)(1))

JEFFREY A. TAYLOR  
Attorney of the United States in  
and for the District of Columbia  
Bar No. 498610

BY: \_\_\_\_\_

S. ELISA POTEAT  
Assistant United States Attorney  
Bar No. 420604  
Organized Crime and Narcotics Trafficking Section  
555 4<sup>th</sup> Street, N.W.  
Washington, D.C. 20530  
(202) 514-7067