

- (a) A base salary, which increased from approximately \$148,000 in 2001, to about \$303,000 in 2006;
- (b) A housing allowance, which increased from nearly \$130,000 in 2001, to more than \$151,000 in 2006;
- (c) A vehicle allowance, which increased from almost \$40,000 in 2001, to more than \$54,000 in 2006;
- (d) Annual bonuses in the total amount of approximately \$75,000, between 2001 and 2006;
- (e) Christmas bonuses of between \$500 and \$3,000;
- (f) Honorariums, or payments that he received for hosting special events;
- (g) Payments for vacations totaling nearly \$30,000 between 2001 and 2006;
- (h) Payments for his federal income tax liabilities and social security contributions of nearly \$100,000;
- (i) Payments for his daughter's education totaling more than \$32,000;
- (j) Payments for the performance of weddings, funerals, and other ministerial duties;
- (k) Unlimited use a of Mercedes-Benz, owned by GSC, with a value of nearly \$83,000, and a monthly lease payment of over \$1,500 per month, paid by GSC;
- (l) Use of a credit card in the name of GSC to make personal expenditures and purchases and for which no receipts or other accounting was provided;
- (m) Payments that were used, in part, to fund a retirement plan;
- (n) Payments for insurance;
- (o) Reimbursements for purported business-related expenses, including travel allegedly on behalf of GSC, of almost \$140,000 between 2001 and 2006;
- (p) Payments from members of the GSC as a result of his employment as senior pastor.

4. In sum, from 2001 through 2006, Defendant received over \$3.1 million in payments and

reimbursements from GSC. This figure does not include payments made to Defendant as gifts or any non-income payments to members of Defendant's family by GSC and individual GSC parishioners. This figure also does not include any of the cash payments by members of GSC as a result of his employment as the Senior Pastor of GSC, although such payments constitute compensation and were reportable as income by Defendant on his jointly filed federal and state tax returns. Defendant's spouse also earned taxable income from GSC of more than \$835,000 during the years 2001 through 2006.

5. In addition to his compensation from GSC, Defendant also received more than \$400,000 in compensation from 2001 through 2006, from speaking engagements at other churches and income from book sales. Similarly, Defendant's spouse earned approximately \$37,000 from speaking engagements outside GSC.

Defendant's Tax Filing And Payment History

6. Defendant failed to file his joint 2000 federal income tax return at the time required by law. That return was ultimately filed on January 14, 2002, more than eight months late. Defendant filed his joint 2001 federal income tax return late on October 20, 2002.
7. Defendant failed to file his joint 2002 federal income tax return at the time required by law. That return was ultimately filed on August 30, 2004, more than a year late. Defendant filed his joint 2003 federal income tax return on the same date.
8. Defendant filed his 2004 joint federal income tax return late on October 24, 2005. Defendant also filed his 2005 joint federal income tax return late on October 18, 2006. Defendant did file his 2006 return at the time required by law.
10. Between 2001 and 2006, Defendant filed false federal tax returns that failed to report more than \$800,000 in taxable income from GSC and other churches. His jointly filed tax returns also failed to report at least \$75,000 in taxable income earned separately by his spouse.
11. As a result of his filing of false and fraudulent federal tax returns and his intentional failures to report taxable income, Defendant evaded and attempted to evade between \$200,000 and \$400,000 in federal income taxes.
12. In addition, Defendant filed false North Carolina income tax returns for 2001 through 2006, which were based on the false federal tax returns, in which he also failed to report substantial amounts of taxable income for those years. As a result of the false state income tax returns, Defendant evaded a substantial amount of North Carolina income taxes.

13. On October 20, 2008, Defendant filed untimely joint 2007 federal and state income tax returns. Those returns are also false and Defendant again knowingly failed to report all of his taxable income on those returns with the intent to evade his tax obligations for that year. As of the date of this indictment, Defendant's 2008 federal income tax return has not been filed.
14. Between 2001 and the date of this indictment, Defendant filed at least 14 false and fraudulent income tax returns for the purpose of evading his federal and state tax liabilities.

Defendant's Knowledge of Unreported Income

15. Between 2001 and 2006, Defendant accumulated a number of luxury assets and enjoyed an extravagant lifestyle which far exceeded his reported taxable income for those years. Among the personal expenditures made by Defendant were the following vehicles, homes, home-related expenses, and other goods and services:

(a) the following vehicles:

Vehicle	Time Period	Value	Monthly Lease	Approximate Annual Payment
2002 Lexus LX470	2001-2004	\$57,643	\$998	\$11,000
2002 Lexus SC430	2002	\$55,671	\$1,256	\$15,000
2005 Lexus LX470	2004-2006	\$66,200	\$1,372	\$15,000
2006 Lexus SC430	2006	\$59,426	\$1,120	\$13,000
2006 Lexus LX470	2006-2008	\$67,529	\$1,379	\$15,000
2004 Maybach 57	2005-2007	\$244,182	\$4,500	\$54,000
2004 BMW 530i	2003-2006	\$52,324	\$899	\$11,000
2007 Mercedes-Benz S550V	2006-present	\$93,825	\$1,915	\$22,000
2005 Bentley GT	2005-2008	\$175,832	\$3,527	\$42,000

- (b) the lease of various other miscellaneous vehicles, including a Cadillac, an Acura, a Volkswagen, a Maxima, a Durango, a Neon and a Toyota, between 2004 and 2006, with annual lease payments exceeding \$21,000;
- (c) the purchase of a home valued at approximately \$990,000, with a \$820,000 mortgage requiring monthly payments of \$6,500, or total annual mortgage payments of more than \$75,000;
- (d) mortgage payments on a second home with a fair market value of more than \$200,000, totaling approximately \$20,000 per year until sold in 2005;
- (e) the purchase of three horses totaling more than \$25,000;
- (f) tuition payments for his daughter's education averaging approximately \$7,000 per semester;
- (g) payments for lawn care of more than \$20,000 per year;
- (h) payments for house cleaning services of more than \$7,000 per year;
- (i) payments for dry cleaning services of approximately \$5,000 per year;
- (j) payments for car washes totaling more than \$22,000 over a two-year period;
- (k) payments for homeowner association dues of more than \$8,000 per year;
- (l) payments for utilities averaging more than \$16,000 per year;
- (m) payments for telephone services of more than \$7,000 per year;
- (n) entertainment expenses of more than \$10,000 per year;
- (o) investments in mutual funds in the amount of \$20,000 per year;
- (p) purported charitable donations in cash averaging more than \$160,000 per year, for 2001 through 2006.

16. Even after the grand jury began its investigation into the validity of Defendant's tax filing and payment history, Defendant made additional extravagant expenditures which alone were sufficient to provide knowledge that his tax returns did not truthfully report all of his taxable income including:

- (a) the lease of a 2007 Rolls-Royce Phantom, valued at \$352,500, which required a monthly lease payment of \$5,787, or nearly \$70,000 annually;
- (b) the lease of a 2009 Lexus LX570, from 2008 through the present, which required a down payment of \$7,962 and a monthly lease payment of \$1,699, or more than \$20,000 annually;
- (c) the lease of new residence in 2007, valued at \$3.7 million, with monthly lease payments of \$21,000 per month.

Defendant's False Statements And Attempts To Obstruct Investigation

17. During the course of the grand jury's investigation of this case, Defendant made false, fictitious, and fraudulent statements concerning matters that were material to the investigation conducted by federal law enforcement agents in an effort to obstruct the investigation of his federal income tax liabilities, including, but not limited to the following:
- (a) That he advised his return preparer about his annual bonuses and that all of his bonuses were properly reported on his federal income tax returns, when, in fact, Defendant did not report any of his bonuses as income on any of his tax returns;
 - (b) That he advised his return preparer that checks intended to fund a retirement plan were issued by GSC directly to Defendant when, in fact, Defendant failed to tell his return preparer that he had exclusive control over the disposition of those retirement payments and, instead, lead his return preparer to believe that Defendant's retirement plan was a qualified plan under which payments were made directly by GSC into the plan;
 - (c) That he provided receipts to GSC to support any reimbursements sought for business-related expenditures he made with his personal funds, when, in fact, Defendant rarely provided any receipts to GSC to justify the reimbursements sought or to establish the business nature of the expenditures, if any;
 - (d) That he provided all Forms 1099 and a list of all income received from speaking engagements at other churches, when, in fact, Defendant withheld from his return preparer a true and correct accounting of all income he received from outside speaking engagements;
 - (e) That he earned no more than \$15,000 per year from outside speaking engagements, when, in fact, Defendant earned more than \$400,000 in outside income during the years 2001 through 2006;

- (f) That he told his return preparer that GSC paid for the educational expenses of his daughter and that those payments were included on his tax returns, when, in fact, Defendant withheld information from his return preparer concerning the payments for his daughter's education and that income was not included on his tax returns;
- (g) That he told his return preparer that GSC paid his income tax and social security liabilities and that such income was reported on his federal tax returns, when, in fact, Defendant failed to advise his return preparer of those payments and that income was not included on his tax returns;
- (h) That he did not have access to or use a credit card in the name of GSC, when, in fact, Defendant used a GSC credit card and refused to provide any explanation or receipts to justify the expenditures.

Defendant's Scheme And Artifice To Commit Mail Fraud

18. In an effort to secure approval for the lease of several high-cost, luxury vehicles, Defendant was required to provide information as to his credit worthiness to the financing companies, including a statement of his annual income. In order to obtain the vehicles, Defendant submitted false loan applications that substantially inflated his annual income, as further described below. Each of the loan applications was mailed from an automotive dealership within the Western District of North Carolina to Toyota Motor Credit, which receives its funding for leases from Mellon Trust of New England:
- (a) On or about May 27, 2002, Defendant submitted a loan application to Toyota Motor Credit for the purpose of obtaining a lease of a 2002 Lexus SC430, valued at \$55,671, for which the monthly lease payment would be \$1,256. On the loan application, Defendant fraudulently listed his monthly income as \$60,000 per month, or \$720,000 per year, whereas he well knew that his income was less than the amount stated, and substantially less than the amount reported on his tax returns for 2002.
 - (b) On or about August 7, 2006, Defendant submitted a loan application to Toyota Motor Credit for the purpose of obtaining a lease of a 2006 Lexus SC430, valued at \$59,426, for which a down payment of \$3,065 and a monthly lease payment of \$1,120 was required. On the loan application, Defendant fraudulently listed his monthly income as \$100,000 per month, or \$1.2 million per year, whereas he well knew that his income was less than the amount stated, and substantially less than the amount reported on his tax returns for 2006.
 - (c) On or about August 7, 2006, Defendant submitted a loan application to Toyota

Motor Credit for the purpose of obtaining a lease of a 2006 Lexus LX470, valued at \$67,529, for which a down payment of \$5,568 and a monthly lease payment of \$1,379 was required. On the loan application, Defendant fraudulently listed his monthly income as \$100,000 per month, or \$1.2 million per year, whereas he well knew that his income was less than the amount stated, and substantially less than the amount reported on his tax returns for 2006.

COUNT ONE

Violation: 26 U.S.C. § 7201(tax evasion)

Paragraphs 1 through 18 of the Introduction to this Bill of Indictment are re-alleged and incorporated by reference herein.

On or about August 30, 2004, in Mecklenburg County, within the Western District of North Carolina, and elsewhere, aided and abetted by others known and unknown to the grand jury, the defendant,

ANTHONY L. JINWRIGHT

a resident of Charlotte, North Carolina, who during the calendar year 2002 was married, did willfully attempt to evade and defeat a large part of the income tax due and owing by him and his spouse to the United States of America for the calendar year 2002 by preparing and causing to be prepared, and by signing and causing to be signed, a false and fraudulent joint U.S. Individual Income Tax Return, Form 1040, on behalf of himself and his spouse, which was filed with the Internal Revenue Service, wherein it was stated that their joint taxable income for said calendar year was the sum of \$00, and that the amount of tax due and owing thereon was the sum of \$16,557, whereas, as he then and there well knew and believed, their joint taxable income for the said calendar year was \$33,031, upon which joint taxable income there was owing to the United States of America an income tax of \$23,469.

All in violation of Title 26, United States Code, Section 7201, and Title 18, United States Code, Section 2.

COUNT TWO

Violation: 26 U.S.C. § 7201(tax evasion)

Paragraphs 1 through 18 of the Introduction to this Bill of Indictment are re-alleged and incorporated by reference herein.

On or about August 30, 2004, in Mecklenburg County, within the Western District of North Carolina, and elsewhere, aided and abetted by others known and unknown to the grand jury, the defendant,

ANTHONY L. JINWRIGHT

a resident of Charlotte, North Carolina, who during the calendar year 2003 was married, did willfully attempt to evade and defeat a large part of the income tax due and owing by him and his spouse to the United States of America for the calendar year 2003 by preparing and causing to be prepared, and by signing and causing to be signed, a false and fraudulent joint U.S. Individual Income Tax Return, Form 1040, on behalf of himself and his spouse, which was filed with the Internal Revenue Service, wherein it was stated that their joint taxable income for said calendar year was the sum of \$00, and that the amount of tax due and owing thereon was the sum of \$15,921, whereas, as he then and there well knew and believed, their joint taxable income for the said calendar year was \$21,557, upon which joint taxable income there was owing to the United States of America an income tax of \$22,942.

All in violation of Title 26, United States Code, Section 7201, and Title 18, United States Code, Section 2.

COUNT THREE

Violation: 26 U.S.C. § 7201(tax evasion)

Paragraphs 1 through 18 of the Introduction to this Bill of Indictment are re-alleged and incorporated by reference herein.

On or about October 24, 2005, in Mecklenburg County, within the Western District of North Carolina, and elsewhere, aided and abetted by others known and unknown to the grand jury, the defendant,

ANTHONY L. JINWRIGHT

a resident of Charlotte, North Carolina, who during the calendar year 2004 was married, did willfully attempt to evade and defeat a large part of the income tax due and owing by him and his spouse to the United States of America for the calendar year 2004 by preparing and causing to be prepared, and by signing and causing to be signed, a false and fraudulent joint U.S. Individual Income Tax Return, Form 1040, on behalf of himself and his spouse, which was filed with the Internal Revenue Service, wherein it was stated that their joint taxable income for said calendar year was the sum of \$00, and that the amount of tax due and owing thereon was the sum of \$15,963, whereas, as he then and there well knew and believed, their joint taxable income for the said calendar year was \$49,999, upon which joint taxable income there was owing to the United States of America an income tax of \$29,473.

All in violation of Title 26, United States Code, Section 7201, and Title 18, United States Code, Section 2.

COUNT FOUR

Violation: 26 U.S.C. § 7201(tax evasion)

Paragraphs 1 through 18 of the Introduction to this Bill of Indictment are re-alleged and incorporated by reference herein.

On or about October 18, 2006, in Mecklenburg County, within the Western District of North Carolina, and elsewhere, aided and abetted by others known and unknown to the grand jury, the defendant,

ANTHONY L. JINWRIGHT

a resident of Charlotte, North Carolina, who during the calendar year 2005 was married, did willfully attempt to evade and defeat a large part of the income tax due and owing by him and his spouse to the United States of America for the calendar year 2005 by preparing and causing to be prepared, and by signing and causing to be signed, a false and fraudulent joint U.S. Individual Income Tax Return, Form 1040, on behalf of himself and his spouse, which was filed with the Internal Revenue Service, wherein it was stated that their joint taxable income for said calendar year was the sum of \$125,479, and that the amount of tax due and owing thereon was the sum of \$47,889, whereas, as he then and there well knew and believed, their joint taxable income for the said calendar year was \$252,268, upon which joint taxable income there was owing to the United States of America an income tax of \$89,081.

All in violation of Title 26, United States Code, Section 7201, and Title 18, United States Code, Section 2.

COUNT FIVE

Violation: 26 U.S.C. § 7201(tax evasion)

Paragraphs 1 through 18 of the Introduction to this Bill of Indictment are re-alleged and incorporated by reference herein.

On or about April 18, 2007, in Mecklenburg County, within the Western District of North Carolina, and elsewhere, aided and abetted by others known and unknown to the grand jury, the defendant,

ANTHONY L. JINWRIGHT

a resident of Charlotte, North Carolina, who during the calendar year 2006 was married, did willfully attempt to evade and defeat a large part of the income tax due and owing by him and his spouse to the United States of America for the calendar year 2006 by preparing and causing to be

prepared, and by signing and causing to be signed, a false and fraudulent joint U.S. Individual Income Tax Return, Form 1040, on behalf of himself and his spouse, which was filed with the Internal Revenue Service, wherein it was stated that their joint taxable income for said calendar year was the sum of \$104,946, and that the amount of tax due and owing thereon was the sum of \$43,218, whereas, as he then and there well knew and believed, their joint taxable income for the said calendar year was \$401,330, upon which joint taxable income there was owing to the United States of America an income tax of \$142,819.

All in violation of Title 26, United States Code, Section 7201, and Title 18, United States Code, Section 2.

COUNT SIX

Violation: 26 U.S.C. § 7206(1) (false tax return)

Paragraphs 1 through 18 of the Introduction to this Bill of Indictment are re-alleged and incorporated by reference herein.

On or about August 30, 2004, in Mecklenburg County, within the Western District of North Carolina, and elsewhere, aided and abetted by others known and unknown to the grand jury, the defendant,

ANTHONY L. JINWRIGHT

a resident of Charlotte, North Carolina, aided and abetted by others known and unknown to the grand jury, did willfully make and subscribe a joint U.S. Individual Income Tax Return, for the calendar year 2002, which was verified by a written declaration that it was made under the penalties of perjury and which he did not believe to be true and correct as to every material matter. That income tax return, which was filed with the Internal Revenue Service, reported adjusted gross income of \$63,597, whereas, as he then and there well knew and believed, he received adjusted income of approximately \$230,055.

All in violation of Title 26, United States Code, Section 7206(1) and Title 18 United States Code, Section 2.

COUNT SEVEN

Violation: 26 U.S.C. § 7206(1) (false tax return)

Paragraphs 1 through 18 of the Introduction to this Bill of Indictment are re-alleged and incorporated by reference herein.

On or about August 30, 2004, in Mecklenburg County, within the Western District of North Carolina, and elsewhere, aided and abetted by others known and unknown to the grand jury, the defendant,

ANTHONY L. JINWRIGHT

a resident of Charlotte, North Carolina, aided and abetted by others known and unknown to the grand jury, did willfully make and subscribe a joint U.S. Individual Income Tax Return, for the calendar year 2003, which was verified by a written declaration that it was made under the penalties of perjury and which he did not believe to be true and correct as to every material matter. That income tax return, which was filed with the Internal Revenue Service, reported adjusted gross income of \$85,190, whereas, as he then and there well knew and believed, he received adjusted income of approximately \$278,263.

All in violation of Title 26, United States Code, Section 7206(1) and Title 18 United States Code, Section 2.

COUNT EIGHT

Violation: 26 U.S.C. § 7206(1) (false tax return)

Paragraphs 1 through 18 of the Introduction to this Bill of Indictment are re-alleged and incorporated by reference herein.

On or about October 24, 2005, in Mecklenburg County, within the Western District of North Carolina, and elsewhere, aided and abetted by others known and unknown to the grand jury, the defendant,

ANTHONY L. JINWRIGHT

a resident of Charlotte, North Carolina, aided and abetted by others known and unknown to the grand jury, did willfully make and subscribe a joint U.S. Individual Income Tax Return, for the calendar year 2004, which was verified by a written declaration that it was made under the penalties of perjury and which he did not believe to be true and correct as to every material matter. That income tax return, which was filed with the Internal Revenue Service, reported adjusted gross income of \$222,454, whereas, as he then and there well knew and believed, he received adjusted income of approximately \$330,485.

All in violation of Title 26, United States Code, Section 7206(1) and Title 18 United States Code, Section 2.

COUNT NINE

Violation: 26 U.S.C. § 7206(1) (false tax return)

Paragraphs 1 through 18 of the Introduction to this Bill of Indictment are re-alleged and incorporated by reference herein.

On or about October 18, 2006, in Mecklenburg County, within the Western District of North Carolina, and elsewhere, aided and abetted by others known and unknown to the grand jury, the defendant,

ANTHONY L. JINWRIGHT

a resident of Charlotte, North Carolina, aided and abetted by others known and unknown to the grand jury, did willfully make and subscribe a joint U.S. Individual Income Tax Return, for the calendar year 2005, which was verified by a written declaration that it was made under the penalties of perjury and which he did not believe to be true and correct as to every material matter. That income tax return, which was filed with the Internal Revenue Service, reported adjusted gross income of \$362,421, whereas, as he then and there well knew and believed, he received adjusted income of approximately \$490,698.

All in violation of Title 26, United States Code, Section 7206(1) and Title 18 United States Code, Section 2.

COUNT TEN

Violation: 26 U.S.C. § 7206(1) (false tax return)

Paragraphs 1 through 18 of the Introduction to this Bill of Indictment are re-alleged and incorporated by reference herein.

On or about April 18, 2007, in Mecklenburg County, within the Western District of North Carolina, and elsewhere, aided and abetted by others known and unknown to the grand jury, the defendant,

ANTHONY L. JINWRIGHT

a resident of Charlotte, North Carolina, aided and abetted by others known and unknown to the grand jury, did willfully make and subscribe a joint U.S. Individual Income Tax Return, for the calendar year 2006, which was verified by a written declaration that it was made under the penalties of perjury and which he did not believe to be true and correct as to every material matter. That income tax return, which was filed with the Internal Revenue Service, reported adjusted gross income of \$398,804, whereas, as he then and there well knew and believed, he

received adjusted income of approximately \$645,772.

All in violation of Title 26, United States Code, Section 7206(1) and Title 18 United States Code, Section 2.

COUNT ELEVEN

Violation: 18 U.S.C. § 1001 (false statements to federal agents)

Paragraphs 1 through 18 of the Introduction to this Bill of Indictment are re-alleged and incorporated by reference herein.

On or about November 29, 2007, in Mecklenburg County, within the Western District of North Carolina, and elsewhere, the defendant,

ANTHONY L. JINWRIGHT

aided and abetted by others known and unknown to the grand jury, in a matter within the jurisdiction of the Executive Branch of the Government of the United States, specifically a matter under investigation by the Internal Revenue Service, an Agency of the United States, did knowingly and willfully make materially false, fictitious, and fraudulent statements and representations; that is, during an interview conducted by special agents of the Internal Revenue Service, Defendant provided false answers to questions as described in detail in paragraph 17 above.

All in violation of Title 18, United States Code, Section 1001.

COUNT TWELVE

Violation: 18 U.S.C. § 1341 (mail fraud)

Paragraphs 1 through 18 of the Introduction to this Bill of Indictment are re-alleged and incorporated by reference herein.

On or about May 27, 2002, in Mecklenburg County, within the Western District of North Carolina, and elsewhere, the defendant,

ANTHONY L. JINWRIGHT

aided and abetted by others known and unknown to the grand jury, having devised and intending to devise a scheme and artifice affecting a financial institution, as described in paragraph 18 above, to defraud and to obtain money and property by means of false and fraudulent pretenses and representations, for the purpose of executing and in order to effect the scheme and artifice,

did knowingly cause to be sent, delivered, and moved by the United States Postal Service as well as through private commercial mail carriers, according to the directions thereon, certain matters or things, to various persons and locations, to wit a false and fraudulent loan application in connection with the lease of a 2002 Lexus SC430.

All in violation of Title 18, United States Code, Section 1341.

COUNT THIRTEEN
Violation: 18 U.S.C. § 1341 (mail fraud)

Paragraphs 1 through 18 of the Introduction to this Bill of Indictment are re-alleged and incorporated by reference herein.

On or about August 7, 2006, in Mecklenburg County, within the Western District of North Carolina, and elsewhere, the defendant,

ANTHONY L. JINWRIGHT

aided and abetted by others known and unknown to the grand jury, having devised and intending to devise a scheme and artifice affecting a financial institution, as described in paragraph 18 above, to defraud and to obtain money and property by means of false and fraudulent pretenses and representations, for the purpose of executing and in order to effect the scheme and artifice, did knowingly cause to be sent, delivered, and moved by the United States Postal Service as well as through private commercial mail carriers, according to the directions thereon, certain matters or things, to various persons and locations, to wit a false and fraudulent loan application in connection with the lease of a 2006 Lexus SC430.

All in violation of Title 18, United States Code, Section 1341.

COUNT FOURTEEN
Violation: 18 U.S.C. § 1341 (mail fraud)

Paragraphs 1 through 18 of the Introduction to this Bill of Indictment are re-alleged and incorporated by reference herein.

On or about August 7, 2006, in Mecklenburg County, within the Western District of North Carolina, and elsewhere, the defendant,

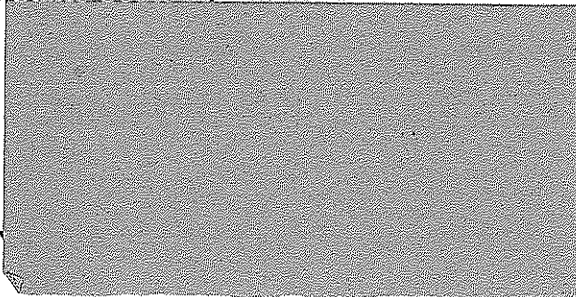
ANTHONY L. JINWRIGHT

aided and abetted by others known and unknown to the grand jury, having devised and intending

to devise a scheme and artifice affecting a financial institution, as described in paragraph 18 above, to defraud and to obtain money and property by means of false and fraudulent pretenses and representations, for the purpose of executing and in order to effect the scheme and artifice, did knowingly cause to be sent, delivered, and moved by the United States Postal Service as well as through private commercial mail carriers, according to the directions thereon, certain matters or things, to various persons and locations, to wit a false and fraudulent loan application in connection with the lease of a 2006 Lexus LX470.

All in violation of Title 18, United States Code, Section 1341.

EDWARD R. RYAN
ACTING UNITED STATES ATTORNEY





DAVID A. BROWN
Assistant United States Attorney



THOMAS T. CULLEN
Assistant United States Attorney