

THE PURPOSE OF THE CONSPIRACY

2. The purpose of the conspiracy was for the defendant and others to personally profit from the sale of 5916 Morning Dove Lane by fraudulently causing the HUD-1 settlement statement to falsely reflect the source of closing costs.

THE MANNER AND MEANS OF THE CONSPIRACY

3. Defendant participated in a scheme to personally profit by concealing the true source of closing costs once the lender had determined that certain closing costs could not be paid by the seller.

4. B.L.B. acted as the buyer's agent in the purchase of 5916 Morning Dove Lane in Oak Tree Subdivision, Edmond, Oklahoma.

5. **CAMPBELL** acted as the sellers' agent for 5916 Morning Dove Lane in Oak Tree Subdivision.

6. B.L.B. would present contracts to sellers' real estate agents, including **CAMPBELL**, in which buyers agreed to purchase homes at prices well above the properties' original Multilist Service ("MLS") list prices.

7. Prior to the closing on the property, the loan proceeds were wire-transferred from the lender to the bank account of the closing company in Oklahoma. At closing, the title company

was directed by **CAMPBELL**, B.L.B., and the sellers to account for certain "fees and closing costs."

8. At closing **CAMPBELL** and others caused the HUD-1 settlement statement to falsely reflect that the buyer was paying certain closing costs.

9. **CAMPBELL** and others received commissions from the sale of the home at the time of closing.

10. At or near the time of closing, **CAMPBELL** diverted payment of certain costs from the seller to the buyer.

OVERT ACTS

11. In furtherance of the conspiracy, conspirators committed and caused to be committed the following overt acts, among others, in the Western District of Oklahoma and elsewhere:

(a) On or about September 15, 2003, B.L.B. submitted a purchase contract on behalf of D.J.A. to **CAMPBELL**, the sellers' agent, for 5916 Morning Dove Lane in the amount of \$310,000.00, which was \$75,000.00 above the MLS list price;

(b) At the closing, on or about October 17, 2003, B.L.B. and **CAMPBELL** each received real estate commissions of approximately \$6,675.00 and United Lending received a commission of approximately \$9,820.00;

(c) On or about October 22, 2003, the sellers received their sales proceeds;

(d) On October 23, 2003, at the direction of **CAMPBELL**, the sellers wired \$3,632.00 of the proceeds to **CAMPBELL**'s bank account;

(e) On or about October 30, 2003, **CAMPBELL** caused \$3,632.00 to be paid to B.L.B.; and

(f) On or about November 6, 2003, B.L.B. deposited the \$3,632.00 from **CAMPBELL** into his bank account.

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

371.

JOHN C. RICHTER
United States Attorney



SUSAN DICKERSON COX
Assistant U.S. Attorney