

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF NEW YORK

THE PEOPLE OF THE STATE OF NEW YORK

-against-

PAUL J. MANAFORT, JR.,

Defendant.

THE GRAND JURY OF THE COUNTY OF NEW YORK, by this indictment, accuses the defendant of the crime of **RESIDENTIAL MORTGAGE FRAUD IN THE FIRST DEGREE**, in violation of Penal Law §187.25, committed as follows:

The defendant, in the County of New York and elsewhere, during the period from on or about December 22, 2015 to on or about March 7, 2016, knowingly and with intent to defraud, presented, caused to be presented, and prepared with knowledge and belief that it would be used in applying for, underwriting and closing a residential mortgage loan, a written statement which contained materially false information concerning a fact material thereto; and concealed, for the purpose of misleading, information concerning a fact material thereto and thereby received proceeds and any other funds in the aggregate in excess of one million dollars.

SECOND COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendant of the crime of **RESIDENTIAL MORTGAGE FRAUD IN THE FIRST DEGREE**, in violation of Penal Law §187.25, committed as follows:

The defendant, in the County of New York and elsewhere, during the period from on or about October 19, 2016 to on or about November 18, 2016, knowingly and with intent to defraud, presented, caused to be presented, and prepared with knowledge and belief that it would be used in applying for, underwriting and closing a residential mortgage loan, a written statement which contained materially false information concerning a fact material thereto; and concealed, for the purpose of misleading, information concerning a fact material thereto and thereby received proceeds and any other funds in the aggregate in excess of one million dollars.

THIRD COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendant of the crime of **RESIDENTIAL MORTGAGE FRAUD IN THE FIRST DEGREE**, in violation of Penal Law §187.25, committed as follows:

The defendant, in the County of New York and elsewhere, during the period from on or about November 1, 2016 to on or about January 17, 2017, knowingly and with intent to defraud, presented, caused to be presented, and prepared with knowledge and belief that it would be used in applying for, underwriting and closing a residential mortgage loan, a written statement which contained materially false information concerning a fact material thereto; and concealed, for the purpose of misleading, information concerning a fact material thereto and thereby received proceeds and any other funds in the aggregate in excess of one million dollars.

FOURTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendant of the crime of **AN ATTEMPT TO COMMIT THE CRIME OF RESIDENTIAL MORTGAGE FRAUD IN THE FIRST DEGREE**, in violation of Penal Law §§110/187.25, committed as follows:

The defendant, in the County of New York and elsewhere, during the period from on or about December 22, 2015 to on or about August 18, 2016, knowingly and with intent to defraud, presented, caused to be presented, and prepared with knowledge and belief that it would be used in applying for, underwriting and closing a residential mortgage loan, a written statement which contained materially false information concerning a fact material thereto; and concealed, for the purpose of misleading, information concerning a fact material thereto and thereby attempted to receive proceeds and any other funds in the aggregate in excess of one million dollars.

FIFTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendant of the crime of **CONSPIRACY IN THE FOURTH DEGREE**, in violation of Penal Law §105.10(1), committed as follows:

The defendant, in the County of New York and elsewhere, during the period from on or about December 22, 2015 to on or about August 18, 2016, with intent that conduct constituting a class B felony, to wit, Residential Mortgage Fraud in the First Degree, be performed, agreed with one and more persons to engage in and cause the performance of such conduct.

## OVERT ACTS

In furtherance of said conspiracy, during the period from on or about December 22, 2015 to on or about August 18, 2016, the following overt acts, among others, were committed by a coconspirator in New York County and elsewhere:

- 1) On or about January 26, 2016, the defendant stated by email to Individual #1, in part and in substance, “The appraiser for Howard St is calling to make an appointment to view the condo. Could you please call [Individual #2] to arrange a time for him to access the apartment. Remember, he believes that you and [Individual #3] are living there.”
- 2) On or about February 2, 2016, the defendant sent a document, named “Use of Cash Letter.docx,” by email to Individual #4 and Individual #5 in New York County.
- 3) On or about February 24, 2016, Individual #6 stated to Individual #5 in New York County, in part and in substance, that defendant was no longer moving forward with a mortgage and they would provide Individual #5 updated insurance binders confirming there were no mortgagee clauses listed on a property.
- 4) On or about February 24, 2016, the defendant stated by email to Individual #4 in New York County, in part and in substance, “Both issues were resolved today. [Individual #6] has informed [Individual #5] and will be forwarding her the appropriate documentation from the Insurance Company later today.”
- 5) On or about March 4, 2016, the defendant signed a document, entitled “Uniform Residential Loan Application.”
- 6) On or about May 1, 2016, the defendant stated by email to Individual #6, in part and in substance, “I need [Individual #7] to do the letter requested below in red. Can you draft it for her to sign?”

- 7) On or about August 18, 2016, Individual #1 sent a document, named “Doc Aug 16, 2016, 1421.pdf,” by email to defendant.

SIXTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendant of the crime of **CONSPIRACY IN THE FOURTH DEGREE**, in violation of Penal Law §105.10(1), committed as follows:

The defendant, in the County of New York and elsewhere, during the period from in or around July 2016 to on or about October 19, 2016, with intent that conduct constituting a class B felony, to wit, Residential Mortgage Fraud in the First Degree, be performed, agreed with one and more persons to engage in and cause the performance of such conduct.

OVERT ACTS

In furtherance of said conspiracy, during the period from in or around July 2016 to on or about October 19, 2016, the following overt acts, among others, were committed by a coconspirator in New York County and elsewhere:

- 1) On a date during the period from in or around July 2016 to on or about August 15, 2016, defendant asked Individual #6 in New York County to sign a letter stating, in part and in substance, “Thank you for allowing me to use the AMEX Business Plum card to purchase season tickets for the 2016 baseball season.”
- 2) On or about August 15, 2016, the defendant sent a document, named “Amex Plum Note RG.pdf,” by email to Individual #8 in New York County.

SEVENTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendant of the crime of **CONSPIRACY IN THE FOURTH DEGREE**, in violation of Penal Law §105.10(1), committed as follows:

The defendant, in the County of New York and elsewhere, during the period from on or about October 21, 2016 to on or about November 18, 2016, with intent that conduct constituting a class B felony, to wit, Residential Mortgage Fraud in the First Degree, be performed, agreed with one and more persons to engage in and cause the performance of such conduct.

OVERT ACTS

In furtherance of said conspiracy, during the period from on or about October 21, 2016 to on or about November 18, 2016, the following overt acts, among others, were committed by a coconspirator in New York County and elsewhere:

- 1) On or about October 21, 2016, the defendant sent a document, named “DMP P&L 9-31-16 .pdf,” by email to Individual #9 in New York County.
- 2) On or about October 28, 2016, the defendant electronically signed a document, entitled “Uniform Residential Loan Application.”

EIGHTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendant of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law §175.10, committed as follows:

The defendant, in the County of New York and elsewhere, on or about January 20, 2016, with intent to defraud, made and caused a false entry in the business records of an enterprise, to wit, Lender #1, and defendant's intent to defraud included an intent to commit another crime and to aid and conceal the commission thereof.

NINTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendant of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law §175.10, committed as follows:

The defendant, in the County of New York and elsewhere, on or about March 4, 2016, with intent to defraud, made and caused a false entry in the business records of an enterprise, to wit, Lender #1, and defendant's intent to defraud included an intent to commit another crime and to aid and conceal the commission thereof.

TENTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendant of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law §175.10, committed as follows:

The defendant, in the County of New York and elsewhere, on or about March 4, 2016, with intent to defraud, made and caused a false entry in the business records of an enterprise, to wit, Lender #1, and defendant's intent to defraud included an intent to commit another crime and to aid and conceal the commission thereof.

ELEVENTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendant of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law §175.10, committed as follows:

The defendant, in the County of New York and elsewhere, on a date during the period from on or about March 11, 2016 to on or about May 2, 2016, with intent to defraud, made and caused a false entry in the business records of an enterprise, to wit, Lender #1, and defendant's intent to defraud included an intent to commit another crime and to aid and conceal the commission thereof.

TWELFTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendant of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law §175.10, committed as follows:

The defendant, in the County of New York and elsewhere, on or about October 6, 2016, with intent to defraud, made and caused a false entry in the business records of an enterprise, to wit, Lender #2, and defendant's intent to defraud included an intent to commit another crime and to aid and conceal the commission thereof.

THIRTEENTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendant of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law §175.10, committed as follows:



The defendant, in the County of New York and elsewhere, on or about October 28, 2016, with intent to defraud, made and caused a false entry in the business records of an enterprise, to wit, Lender #2, and defendant's intent to defraud included an intent to commit another crime and to aid and conceal the commission thereof.

FOURTEENTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendant of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law §175.10, committed as follows:

The defendant, in the County of New York and elsewhere, on or about November 11, 2016, with intent to defraud, made and caused a false entry in the business records of an enterprise, to wit, Lender #2, and defendant's intent to defraud included an intent to commit another crime and to aid and conceal the commission thereof.

FIFTEENTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendant of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law §175.10, committed as follows:

The defendant, in the County of New York and elsewhere, on or about January 5, 2017, with intent to defraud, made and caused a false entry in the business records of an enterprise, to wit, Lender #2, and defendant's intent to defraud included an intent to commit another crime and to aid and conceal the commission thereof.

SIXTEENTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendant of the crime of **SCHEME TO DEFRAUD IN THE FIRST DEGREE**, in violation of Penal Law §190.65(1)(b), committed as follows:

The defendant, in the County of New York and elsewhere, during the period from on or about December 22, 2015 to on or about January 17, 2017, engaged in a scheme constituting a systematic ongoing course of conduct with intent to defraud more than one person and to obtain property from more than one person by false and fraudulent pretenses, representations and promises, and so obtained property with a value in excess of one thousand dollars from one and more such persons.

CYRUS R. VANCE, JR.  
District Attorney

GJ #-

Filed:

NA

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| No. |
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THE PEOPLE OF THE STATE OF NEW YORK

-against-

PAUL J. MANAFORT, JR.,

Defendant.

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INDICTMENT

RESIDENTIAL MORTGAGE FRAUD IN THE FIRST DEGREE, P.L. §187.25, 3 Cts  
 AN ATTEMPT TO COMMIT THE CRIME OF RESIDENTIAL MORTGAGE FRAUD IN THE FIRST DEGREE, P.L. §§110/187.25  
 CONSPIRACY IN THE FOURTH DEGREE, P.L. §105.10(1), 3 Cts  
 FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE, P.L. §175.10, 8 Cts  
 SCHEME TO DEFRAUD IN THE FIRST DEGREE, P.L. §190.65(1)(b)

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CYRUS R. VANCE, JR., District Attorney

A True Bill

Peirce R. Moser  
 Sean C. Pippen  
 James H. Graham  
 Lisa M. White  
 Major Economic Crimes Bureau

Foreman

ADJOURNED TO PART \_\_\_\_\_ ON \_\_\_\_\_