

ORIGINAL

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

CLERK US DISTRICT COURT
NORTHERN DIST. OF TX
FILED

2017 MAY 10 A 9:16

UNITED STATES OF AMERICA

V.

CHRISTINA RENEE CAVENY

DEPUTY CLERK *JK*
NO. 3:16-CR-562-N

(Supersedes indictment returned
12-20-16 as to defendant Caveny)

INFORMATION

The United States Attorney Charges:

At all times material to the information:

Count One

Conspiracy to Commit Mail Fraud
Violation of 18 U.S.C. § 371 (18 U.S.C. §1341)

The Conspiracy and its Objects

1. Beginning in or about February 2012, the exact date being unknown to the Grand Jury, and continuing thereafter until at least in or about January 2013, in the Dallas Division of the Northern District of Texas and elsewhere, defendant **Christina Renee Caveny**, along with Mark Demetri Stein, Richard Bruce Stevens, and Bruce Kevin Hawkins, did unlawfully, knowingly, and willfully conspire and agree together, with each other, and with persons both known and unknown to the Grand Jury, to commit an offense against the United States, namely, the offense of mail fraud in violation of 18 U.S.C. § 1341.

Manner and Means of the Conspiracy

2. It was part of the conspiracy that:
 - a) conspirators falsely represented that conspirators had investors who purchased the homeowner's loan from the present lender at a greatly reduced price through a process called a "short sale";
 - b) conspirators concealed from homeowners that their original lender did not consent to or even know about this so-called "new loan" being made by the conspirators to the homeowner;
 - c) conspirators told homeowners to ignore notices of non-payment sent by their present lender, as conspirators continued to unlawfully collect monthly so-called "mortgage payments" from homeowners;
 - d) conspirators instructed several homeowners to file for bankruptcy but not follow up with the bankruptcy process as an additional means to delay foreclosure and conceal the conspirator's criminal conduct;
 - e) conspirators also concealed from homeowners that all down payment and monthly mortgage payments fraudulently collected from homeowners were being spent for the personal benefit of the conspirators and not being credited on the so-called "new loan"; and
 - f) conspirators caused monthly "mortgage" payment statements to be sent out to the homeowner victims via the United States mail. This use of the

United States mails to collect monthly mortgage payments was part of a mail fraud scheme in which all four defendants participated. This foreclosure rescue scheme targeted many vulnerable homeowner victims.

Acts in Furtherance of the Conspiracy

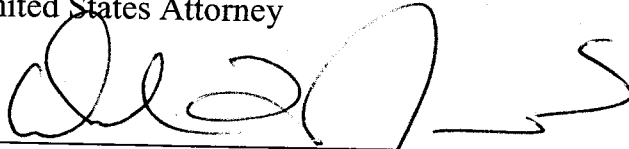
3. On or about April 16, 2012, co-defendants Mark Stein, Richard Stevens and **Christina Caveny** were present at a meeting with homeowner T.A., then residing in her home located on Blossom Circle in Garland, Texas. In this meeting, Stein falsely represented to homeowner T.A. that Stein's company (Real Estate Solutions) had purchased the homeowner's first and second mortgages from her original lenders and informed T.A. to make a down payment on a new "loan", and begin making new monthly mortgage payments to Real Estate Solutions. During the period from April through June 2012, Stein, Stevens and **Caveny** fraudulently collected a total of at least \$4,474 from homeowner T.A.

4. Sometime in June 2012, defendants Kevin Hawkins and **Christina Caveny** were present at a meeting with homeowner K.E., then residing in his home located on Blossom Court in Garland, Texas. In this meeting, Hawkins falsely represented to homeowner K.E. that Hawkins' company (ERealty Group) would purchase the homeowner's original home loan from his original lender. Hawkins also told K.E. that he needed to make an \$1,800 down payment on a fictitious new "loan," and begin making \$1,396 monthly mortgage payments on this new "loan." During the period from August through November 2012, Hawkins fraudulently collected from K.E. a total of at

least \$5,400 from homeowner K.E.

Respectfully submitted,

JOHN R. PARKER
United States Attorney

A handwritten signature in black ink, appearing to read 'David L. Jarvis', written over a horizontal line.

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