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7	IN THE UNITED STATES DISTRICT COURT	
8	FOR THE DISTRICT OF ARIZONA	
9		
10	United States of America,	NO. CR-17-00680-PHX-GMS
11	Plaintiff,	INFORMATION
12	VS.	
13	Yomtov Scott Menaged,	VIO: 18 U.S.C. § 1956(h) (Money Laundering Conspiracy) Count One
14	Defendant.	
15	THE UNITED STATES ATTORNEY CHARGES:	
16	BACKGROUND	
17	At all times relevant to this Information: 1. The defendant YOMTOV SCOTT MENAGED ("Menaged") owned a	
18		
19	1. The defendant fowffor Scott Menaged) owned a	
20	number of retail furniture stores and also worked as a real estate investor in the Phoenix	
21	metropolitan area. Menaged was the sole owner and manager of several real estate	
22	investment entities including Arizona Home Foreclosures, LLC ("AHF").	
23		
24	2. DenSco Investment Corporation ("DenSco") was a hard money lender	
25	formed by D.C. in April 2001, whose primary business was to provide funding through	
26	short-term, high-interest loans to real estate investors for the purchase of real estate	
27	•	
28	Between 2007 and 2008, D.C. and DenSco began a lending relationship with Menaged and	

loaned monies for the purchase of real estate through foreclosure Trustee Sales conducted in Arizona.

- 3. Menaged, or Menaged's employees at his direction, identified prospective properties to purchase and sent by email a listing of properties and proposed sale amounts to D.C. and DenSco requesting hard money loans for the purchase of the identified properties. DenSco wire transferred funds directly from DenSco 1st Bank Account ending in #5264 to bank accounts owned and operated by Menaged, including AHF JP Morgan Chase bank account ending in #1151. Often Menaged would identify multiple prospective properties to purchase and DenSco would wire transfer aggregate loan amounts to Menaged's accounts for the purchase of multiple properties.
- 4. Starting in January 2014, DenSco began requiring Menaged to provide DenSco with copies of specific cashier's checks, issued by Menaged's bank to the respective foreclosure trustees, as well as copies of the Trustee's Sales Receipts for each transaction conducted with DenSco funding.
- 5. Between January 2014 and June 2016, Menaged and AHF obtained a total of 2,712 loans from DenSco totaling approximately \$734,484,440.67.
- 6. On or about April 20, 2016, Menaged filed for bankruptcy pursuant to Chapter 7 of the United States Bankruptcy Code.

COUNT ONE

Conspiracy to Commit Money Laundering [18 U.S.C. § 1956(h)]

7. All of the allegations set forth in Paragraphs 1 through 6 of the Information are re-alleged and incorporated herein.

- 8. Between in or about January 2014, and continuing through and in or about June 2016, in the District of Arizona, and elsewhere, defendant, MENAGED, V.C., together and with others, both known and unknown, did knowingly, intelligently, and unlawfully combine, conspire, confederate, and agree to knowingly commit the following offenses against the United States:
 - a. Title 18 United States Code, Section 1956(a)(1)(A)(i) (Money Laundering to Promote SUA);
 - b. Title 18 United States Code, Section 1956 (a)(1)(B)(i) (Money Laundering to conceal or disguise proceeds of SUA);
 - c. Title 18 United States Code, Section 1956 (a)(2)(B)(i) (Transfers to Conceal Proceeds of SUA); and
 - d. Title 18 United States Code, Section 1957 (Transactional Money Laundering).

MANNER AND MEANS OF THE CONSPIRACY

- 9. Menaged, with the assistance of others, including employees, falsified the purchase of more than 2,000 properties after obtaining funding from DenSco.
- 10. Menaged and others used email addresses controlled by Menaged to identify properties for sale to DenSco in order to obtain loans when in fact, none of the identified properties were actually purchased.
- 11. Menaged caused DenSco to wire transfer funds for the purchase of properties to bank accounts controlled by Menaged when Menaged and others knew that no real estate purchase was going to occur.

- 12. Menaged caused the issuance of cashier's checks drawn on his bank accounts representing the purchase amount for the properties and emailed, or caused others to email, an image of the checks to DenSco in satisfaction of the lending agreement between the parties. Menaged then immediately redeposited the cashier's checks into accounts he controlled and did not utilize the funds to make the identified real estate purchases.
- 13. Menaged and others executed, notarized, and provided DenSco, often by email, falsified and fabricated documentation purporting to represent Trustee's Sales Receipts for completed real estate transactions when in fact, no real estate purchase ever occurred.
- 14. Menaged transmitted large portions of the proceeds obtained from DenSco to family members and associates including by issuing checks, wire transfers, or other financial transactions often in amounts greater than \$10,000.00.

All in violation of 18 U.S.C. § 1956(h).

Dated this 16^{th} day of October, 2017.

ELIZABETH A. STRANGE Acting United States Attorney District of Arizona

MONICA EDELSTEIN Assistant U.S. Attorney