

AO 257 (Rev. 6/78)

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT

BY: COMPLAINT INFORMATION INDICTMENT SUPERSEDING

OFFENSE CHARGED

Count One: 15 U.S.C. §1 - Bid Rigging Petty
Count Two: 18 U.S.C. §1349 - Conspiracy to Commit Mail Fraud Minor
 Misdemeanor
 Felony

PENALTY: Maximum Terms for Count 1: (1) 10 years prison; (2) fine of \$1 million; (3) 3 years supervised release; (4) \$100 special assessment; and (5) Restitution. Maximum Terms for Count 2: (1) 30 years prison; (2) fine of \$1 million; (3) 5 years supervised release; (4) \$100 special assessment; and (5) Restitution

Name of District Court, and/or Judge/Magistrate Location

NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

FILED
APR - 2 2015

RICHARD W. WIEKING
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND

DEFENDANT - U.S.

Ramin Yeganeh

DISTRICT COURT NUMBER

CR15-00193

HSG

DEFENDANT

IS NOT IN CUSTODY

- Has not been arrested, pending outcome this proceeding.
1) If not detained give date any prior summons was served on above charges
2) Is a Fugitive
3) Is on Bail or Release from (show District)

IS IN CUSTODY

- 4) On this charge
5) On another conviction } Federal State
6) Awaiting trial on other charges
If answer to (6) is "Yes", show name of institution

Has detainer been filed? Yes No } If "Yes" give date filed

DATE OF ARREST Month/Day/Year

Or... if Arresting Agency & Warrant were not

DATE TRANSFERRED TO U.S. CUSTODY Month/Day/Year

This report amends AO 257 previously submitted

PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)

Federal Bureau of Investigation

person is awaiting trial in another Federal or State Court, give name of court

this person/proceeding is transferred from another district per (circle one) FRCrp 20, 21, or 40. Show District

this is a re prosecution of charges previously dismissed which were dismissed on motion of:

U.S. ATTORNEY DEFENSE

SHOW DOCKET NO.

this prosecution relates to a pending case involving this same defendant

MAGISTRATE CASE NO.

prior proceedings or appearance(s) before U.S. Magistrate regarding this defendant were recorded under

Name and Office of Person Furnishing Information on this form Albert B. Sambat, D.O.J.

U.S. Attorney Other U.S. Agency

Name of Assistant U.S. Attorney (if assigned)

ADDITIONAL INFORMATION OR COMMENTS

PROCESS:

SUMMONS NO PROCESS* WARRANT

Bail Amount: _____

If Summons, complete following:

Arraignment Initial Appearance

* Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

Defendant Address:

Date/Time: _____ Before Judge: _____

Comments:

FILED *a*

2015 APR -2 A 9:10
RICHARD W. ZIEGLER
CLERK OF DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

HISG

CR15-00193

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11 Attorneys for the United States

12 UNITED STATES DISTRICT COURT
13 NORTHERN DISTRICT OF CALIFORNIA
14 OAKLAND DIVISION

15 UNITED STATES OF AMERICA

16 v.

17 RAMIN YEGANEH,
18 Defendant.

) Criminal No.
)
) INFORMATION
)
) VIOLATIONS: 15 U.S.C. § 1 –
) Bid Rigging (Count One);
) 18 U.S.C. § 1349 – Conspiracy to
) Commit Mail Fraud (Count Two)

19
20 The United States of America, acting through its attorneys, charges:

21 RAMIN YEGANEH,

22 the defendant herein, as follows:

23 BACKGROUND

24 1. At all times relevant to this Information, when California homeowners defaulted
25 on their mortgages, mortgage holders could institute foreclosure proceedings and sell the
26 properties through non-judicial public real estate foreclosure auctions (“public auctions”). These
27 public auctions were governed by California Civil Code, Section 2924, *et seq.* Typically, a
28 trustee was appointed to oversee the public auctions. These public auctions usually took place at

1 or near the courthouse of the county in which the properties were located. The auctioneer, acting
2 on behalf of the trustee, sold the property to the bidder offering the highest purchase price.
3 Proceeds from the sale were then used to pay the mortgage holders, other holders of debt secured
4 by the property, and, in some cases, the defaulting homeowner (collectively, “beneficiaries”).

5 COUNT ONE: 15 U.S.C. § 1 – Bid Rigging (Alameda County)

6 THE COMBINATION AND CONSPIRACY

7 2. Beginning as early as May 2008 and continuing until in or about October 2010,
8 the defendant, RAMIN YEGANEH, and co-conspirators entered into and engaged in a
9 combination and conspiracy to suppress and restrain competition by rigging bids to obtain
10 selected properties offered at public auctions in Alameda County in the Northern District of
11 California, in unreasonable restraint of interstate trade and commerce, in violation of the
12 Sherman Act, Title 15, United States Code, Section 1.

13 3. The charged combination and conspiracy consisted of a continuing agreement,
14 understanding, and concert of action among the defendant and his co-conspirators to suppress
15 competition by agreeing to refrain from or stop bidding against each other to purchase selected
16 properties at public auctions in Alameda County at non-competitive prices.

17 4. For the purpose of forming and carrying out the charged combination and
18 conspiracy, the defendant and his co-conspirators did those things that they combined and
19 conspired to do, including, among other things:

20 a. agreeing not to compete to purchase selected properties at public auctions
21 in Alameda County;

22 b. designating which conspirator would win the selected properties at the
23 public auctions for the group of conspirators; and

24 c. refraining from or stopping bidding for the selected properties at the
25 public auctions.

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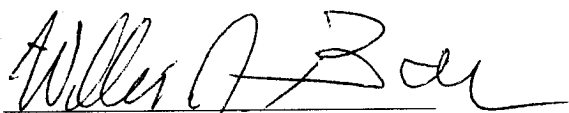
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1 12. For the purpose of executing the scheme and artifice to defraud and attempting to
2 do so, the defendant and his co-conspirators knowingly used and caused to be used the United
3 States Postal Service and private or commercial interstate carriers. For example, trustees used
4 the United States mail and private or commercial interstate carriers to transmit the Trustee's
5 Deeds Upon Sale and other title documents to participants in the conspiracy. These mailings
6 were foreseeable to the defendant in the ordinary course of business.

7 JURISDICTION AND VENUE

8 13. The combination, conspiracy, and agreement to violate Title 18, United States
9 Code, Section 1341 charged in this Information was carried out, in part, in the Northern District
10 of California, within the five years preceding the filing of this Information.

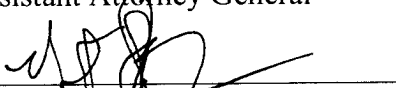
11 ALL IN VIOLATION OF TITLE 18, UNITED STATES CODE, SECTION 1349.

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14 William J. Baer
Assistant Attorney General

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17 Marc Siegel
Chief, San Francisco Office

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20 Brent Snyder
Deputy Assistant Attorney General

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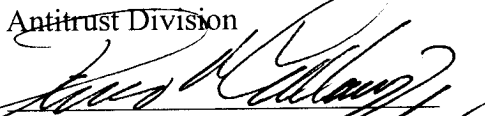
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31 Brian J. Stretch
Attorney for the United States
Acting under Authority Conferred
by 28 U.S.C. § 515