

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF NEW YORK: PART 62

THE PEOPLE OF THE STATE OF NEW  
YORK

Indictment No. 2480/2012

-against-

ABACUS FEDERAL SAVINGS BANK,  
YIU WAH WONG,  
WAI HUNG “RAYMOND” TAM,  
WEN FANG “FANNY” WANG,  
YUK YIN “LORETTA” LAM CHENG,  
CHI FUNG “DANNY” LAU,  
PHOEBE LEE,  
JIE QIONG “MICHELLE” NAN,  
VICTORIA TSUI,  
YING CHUAN “SHELLEY” WANG,  
WAI CHING “ALICE” WONG, and  
YI YI ZHAO,

Defendants.

THE GRAND JURY OF THE COUNTY OF NEW YORK, by this indictment, accuses the defendants of the crime of **CONSPIRACY IN THE FOURTH DEGREE**, in violation of Penal Law §105.10(1), committed as follows:

The defendants, in the County of New York and elsewhere, during the period from on or about May 11, 2005 to on or about February 3, 2010, with intent that conduct constituting a class C felony, to wit, Residential Mortgage Fraud in the Second Degree and Grand Larceny in the Second Degree, be performed, did agree with one and more persons to engage in and cause the performance of such conduct.

**Introduction to the Conspiracy**

At all times relevant to the conspiracy, the defendants were employees and managers of Abacus Federal Savings Bank (“Abacus Bank” or “the Bank”), headquartered in New York, New York. Acting in behalf of Abacus Bank and within the

scope of their employment, the defendants and others participated in a systematic and pervasive mortgage fraud scheme, by repeatedly falsifying and fabricating loan application documents so that otherwise unqualified borrowers could obtain mortgages backed by the Federal National Mortgage Association, a government-sponsored enterprise commonly known as “Fannie Mae.”

The criminal conspiracy involved all aspects of the Abacus Bank loan department, starting with its most senior manager, and included all three of its units: loan origination, processing, and underwriting.

Defendant Yiu Wah Wong was Chief Credit Officer, Vice President, and Underwriting Supervisor. As such, he trained and supervised underwriters and was responsible for quality control of all loans underwritten by the Bank. Defendant Wong reported directly to the Bank’s Chief Executive Officer.

Defendant Wai Hung “Raymond” Tam was the Loan Origination Supervisor. In that position, he was responsible for the training and supervision of loan officers and processors.

Abacus Bank loan originators, including defendants Wen Fang “Fanny” Wang, Ying Chuan “Shelly” Wong, Jie Qiong “Michelle” Nan, Chi Fung “Danny” Lau and Phoebe Lee, regularly instructed prospective borrowers to make misrepresentations in their loan applications, including by inflating or exaggerating their assets, incomes, and job titles on loan applications and Verification of Employment forms.

Abacus loan processors, including defendants Wai Ching “Alice” Wong and Yuk Yin “Loretta” Lam Cheng, helped originators concoct inflated incomes for borrowers. Specifically, processors manipulated loan origination software in order to calculate how much income borrowers needed to show in order to qualify for loans.

Underwriters, including defendants Victoria Tsui and Yi Yi Zhao, approved loans that they knew contained falsehoods, and often failed to conduct adequate scrutiny of documents that were obviously false.

### **Background of the Conspiracy**

A substantial part of Abacus Bank’s business involved the origination, processing, and issuance of residential mortgage loan applications. The Bank sold

these mortgages to Fannie Mae, whose purpose was to facilitate the issuance of home mortgages by providing mortgage financing to local banks, including Abacus Bank. Fannie Mae accomplished this by purchasing mortgages originated and issued by such banks.

To ensure that loans were made at an appropriate risk level, and thereby minimize the possibility of financial harm, Fannie Mae established and enforced mandatory underwriting standards, lending criteria, and verification and due diligence procedures, pursuant to which Abacus Bank made certain representations and warranties about the quality of the loans (the “Standards”). The Standards were used to assess the creditworthiness of prospective borrowers on all mortgages expected to be purchased by Fannie Mae, and mandated the use of specific residential mortgage loan application forms (“1003 Forms” among others). Fannie Mae relied on lenders to follow the Standards, so that lenders could assess and report accurately and honestly the borrowers’ creditworthiness and qualifications for Fannie Mae’s programs.

As part of its business operations, Fannie Mae pooled together batches of mortgages it had purchased, including thousands from Abacus Bank, into securities, which Fannie Mae then promoted and sold to investors. The quality of these securities depended in part upon the adherence of Abacus Bank and other lenders to the Standards, as well as the truthfulness of the information provided on mortgage applications. Because of the conspiracy, Fannie Mae would and did purchase thousands of fraudulent mortgages (the “Fraudulent Mortgages”) from Abacus Bank and subsequently sold those mortgages to investors in the form of mortgage-backed securities. The Bank falsely represented to Fannie Mae that the loans adhered to the Standards.

### **Operation of the Conspiracy**

Because Abacus Bank was required to comply with the Standards in its loan application process, prospective borrowers were asked to provide information concerning income, assets, employment, and residence history, as well as other information relevant to determining creditworthiness. Although this information was required to be recorded accurately, verified, and presented to Fannie Mae in legitimate and truthful business records, in the case of the Fraudulent Mortgages, it was not.

The object of the conspiracy was to generate fees, commissions, and other funds for Abacus Bank by issuing and then selling as many Fraudulent Mortgages as possible to Fannie Mae. Specifically, Abacus Bank obtained origination fees when it issued loans, and received further fees when it sold those loans to Fannie Mae. Even after the initial sale, Abacus Bank continued to collect lucrative loan servicing fees every year, while the risk that the loans would default was passed on to Fannie Mae and, ultimately, to investors.

Loan officers were incentivized to issue as many loans as possible by the promise of earning commissions. They understood that loan production, and by extension, their jobs, depended upon their willingness to ignore the Standards. The conspirators knew that the Fraudulent Mortgages that they repeatedly issued were predicated on false information and documents. As a result of the fraud, Abacus Bank earned many millions of dollars in commissions, origination, and servicing fees between 2005 and 2010, and the bank's employees, including the defendants, earned hundreds of thousands of dollars in commissions.

During the period of the conspiracy, bank employees were specifically trained to carry out the fraud in a manner calculated to avoid suspicion. In so doing, they encouraged, facilitated and directed the criminal conduct, and supervised and approved scores of fraudulent loan applications. Defendants Yiu Wah Wong, Wai Hung "Raymond" Tam and others also falsely told employees that the exceptionally low default rate of Abacus-originated loans made the underlying accuracy of loan documents insignificant.

Loan originators also advanced the conspiracy by creating false or fictitious gift letters, which obscured the source of borrowers' down payments and often disguised borrowers' liabilities as assets. Pursuant to the Standards, gift letters and Verification of Employment ("VoE") forms were, under certain circumstances, both required by Fannie Mae for loans it purchased. At times, originators personally authored and manufactured the fraudulent gift letters and VoE forms, often in plain view of or at the direction of other employees and managers.

The conspiracy turned the mortgage process upside down, in that borrowers were instructed exactly what information needed to be included in their applications for them to qualify for desired loans. As the conspirators well knew and believed, in

legitimate lending institutions, customers provide banks with information pertaining to their income and assets, and banks decide whether the customers qualify for loans. In sharp contrast, at Abacus Bank, loan processors often started by ascertaining how much money customers wanted to borrow, and then reverse-calculated the income and asset figures in order to justify the loan amounts. Contrary to the Standards, processors also provided blank VoE forms to originators and loan applicants instead of mailing the forms directly to employers.

Finally, the Bank's underwriters, who were required to conduct due diligence and, had they done so, would have rejected the fraudulent loan applications for lack of compliance with the Standards, instead abdicated their responsibility and approved the Fraudulent Mortgages in a "rubber-stamp" fashion.

The object and result of these maneuvers was to thwart Fannie Mae's protocols and to incorporate false employment, asset, and income information in loan files, so that loans would appear to fit within the Standards. Additionally, the Bank routinely concealed from its federal regulators both its lack of compliance with the Standards and its failure to meet its obligation to maintain accurate books and records.

In 2009, certain senior executives of the Bank were aware that some of the Bank's customers did not file accurate tax returns, and that a proposed regulation requiring documentation of tax returns would have a detrimental impact on the Bank's lending business. For that reason, Bank management advocated vigorously for an exemption from stricter document requirements, particularly a condition that would have required borrowers to permit the examination of tax returns upon request. Indeed, when the requested exemption was denied and the tax rule instituted, Abacus Bank's loan origination volume plummeted more than ninety percent.

During the period of the conspiracy, Abacus Bank sold hundreds of millions of dollars worth of Fraudulent Mortgages to Fannie Mae. If not for the false representations contained in the loan documents, Fannie Mae would not have purchased these loans. Abacus Bank managers were aware that the mortgage loans sold to Fannie Mae would be securitized and distributed to investors in the secondary loan market.

## OVERT ACTS

In the course of and in furtherance of the conspiracy, the conspirators committed and caused to be committed the following overt acts:

1. On or about October 18, 2006, in New York County, defendants Abacus Federal Savings Bank, Jie Qiong “Michelle” Nan and others filed with Abacus Federal Savings Bank as part of that bank’s loan approval process a Verification of Employment form containing false employment information in connection with an \$80,000 loan.

2. On or about January 10, 2007, in New York County, defendants Abacus Federal Savings Bank, Yuk Yin “Loretta” Lam Cheng and others filed with Abacus Federal Savings Bank as part of that bank’s loan approval process Gift Letter Affidavits containing false information in connection with a \$300,000 loan.

3. On or about March 17, 2009, in New York County, defendants Abacus Federal Savings Bank, Yiu Wah Wong and other managers and senior executives at Abacus Federal Savings Bank, in an email exchange, acknowledged that requiring the bank’s mortgage borrowers to provide tax returns was problematic because either borrowers were reluctant to do so, or the returns would reflect continuous losses, in which case, the borrowers would not qualify for loans.

4. On or about July 31, 2009, in New York County, at an Abacus Bank Management Compliance Committee Meeting attended by senior bank managers and executives, certain individuals, including Yiu Wah Wong, discussed the bank’s position against requiring its borrowers to sign 4506T forms because those forms could establish that many of the bank’s borrowers did not accurately report their incomes to tax authorities.

5. On or about August 19, 2009, in New York County, defendants Abacus Federal Savings Bank, Wai Hung “Raymond” Tam and others instructed a loan officer to modify a loan application so that a borrower’s income, would falsely appear

to have had taxes withheld, a modification that would make the stated income more believable.

6. On or about June 8, 2009 to on or about February 3, 2010, in New York County, defendant Danny Lau, purporting to be another person, falsely signed a Gift Letter and represented that his signature was that of the other person.

7. On or about June 8, 2009 to on or about February 3, 2010, in New York County, defendant Danny Lau caused an inflated income amount to be inserted in a borrower's loan application.

8. On or about July 11, 2005 to on or about October 20, 2007, in New York County, defendant Phoebe Lee caused a Verification of Employment containing falsified income information to be submitted to Abacus Federal Savings Bank.

9. On or about July 11, 2005 to on or about October 20, 2007, in New York County, defendant Phoebe Lee caused a falsified Gift Letter to be submitted to Abacus Federal Savings Bank.

10. On or about August 8, 2005, in New York County, defendants Abacus Federal Savings Bank, Yiu Wah Wong and others, intentionally sold to Fannie Mae a \$460,000 mortgage with the knowledge that the loan application paperwork underlying that mortgage contained false information.

11. On or about December 4, 2006, in New York County, defendants Abacus Federal Savings Bank, Yiu Wah Wong and others, intentionally sold to Fannie Mae an \$80,000 mortgage with the knowledge that the loan application paperwork underlying that mortgage contained false information.

12. On or about June 1, 2007, in New York County, defendants Abacus Federal Savings Bank, Yiu Wah Wong and others, intentionally sold to Fannie Mae a

\$273,000 mortgage with the knowledge that the loan application paperwork underlying that mortgage contained false information.

13. On or about February 20, 2008, in New York County, defendants Abacus Federal Savings Bank, Yiu Wah Wong and others, intentionally sold to Fannie Mae a \$533,000 mortgage with the knowledge that the loan application paperwork underlying that mortgage contained false information.

14. On or about February 26, 2008, in New York County, defendants Abacus Federal Savings Bank, Yiu Wah Wong and others, intentionally sold to Fannie Mae a \$340,000 mortgage with the knowledge that the loan application paperwork underlying that mortgage contained false information.

15. On or about June 15, 2009 , in New York County, defendants Abacus Federal Savings Bank, Yiu Wah Wong and others, intentionally sold to Fannie Mae a \$130,000 mortgage with the knowledge that the loan application paperwork underlying that mortgage contained false information.

16. On or about June 15, 2009, in New York County, defendants Abacus Federal Savings Bank, Yiu Wah Wong and others, intentionally sold to Fannie Mae a \$400,000 mortgage with the knowledge that the loan application paperwork underlying that mortgage contained false information.

17. On or about February 3, 2010, in New York County, defendants Abacus Federal Savings Bank, Yiu Wah Wong and others, intentionally sold to Fannie Mae a \$180,000 mortgage with the knowledge that the loan application paperwork underlying that mortgage contained false information.

18. On or about July 20, 2005, in New York County, defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam and others intentionally caused to be submitted for closing at Abacus Federal Savings Bank loan



application paperwork containing false information in connection with a \$460,000 mortgage.

19. On or about November 21, 2006, in New York County, defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam, Jie Qiong “Michelle” Nan, Wai Ching “Alice” Wong, Victoria Tsui and others intentionally caused to be submitted for closing at Abacus Federal Savings Bank loan application paperwork containing false information in connection with an \$80,000 mortgage.

20. On or about January 18, 2007, in New York County, defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam, Jie Qiong “Michelle” Nan, Yuk Yin “Loretta” Lam Cheng, Victoria Tsui and others intentionally caused to be submitted for closing at Abacus Federal Savings Bank loan application paperwork containing false information in connection with a \$200,000 mortgage.

21. On or about February 13, 2007, in New York County, defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam, Yuk Yin “Loretta” Lam Cheng and others intentionally caused to be submitted for closing at Abacus Federal Savings Bank loan application paperwork containing false information in connection with a \$300,000 mortgage.

22. On or about May 10, 2007, in New York County, defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam, Jie Qiong “Michelle” Nan, Yuk Yin “Loretta” Lam Cheng and others intentionally caused to be submitted for closing at Abacus Federal Savings Bank loan application paperwork containing false information in connection with a \$450,000 mortgage.

23. On or about May 21, 2007, in New York County, defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam, Wen Fang “Fanny” Wang, Yuk Yin “Loretta” Lam Cheng, Yi Yi Zhao and others intentionally caused to be submitted for closing at Abacus Federal Savings Bank loan application paperwork containing false information in connection with a \$273,000 mortgage.

24. On or about September 27, 2007, in New York County, defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam, Yuk Yin “Loretta” Lam Cheng and others intentionally caused to be submitted for closing at Abacus Federal Savings Bank loan application paperwork containing false information in connection with a \$645,000 mortgage.

25. On or about January 2, 2008, in New York County, defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam, Wai Ching “Alice” Wong, Yi Yi Zhao and others intentionally caused to be submitted for closing at Abacus Federal Savings Bank loan application paperwork containing false information in connection with a \$499,000 mortgage.

26. On or about January 11, 2008, in New York County, defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam, Wai Ching “Alice” Wong and others intentionally caused to be submitted for closing at Abacus Federal Savings Bank loan application paperwork containing false information in connection with a \$700,000 mortgage.

27. On or about February 4, 2008, in New York County, defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam, Wai Hung “Raymond” Tam, Yuk Yin “Loretta” Lam Cheng and others intentionally caused to be submitted for closing at Abacus Federal Savings Bank loan application paperwork containing false information in connection with a \$533,000 mortgage.

28. On or about February 8, 2008, in New York County, defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam, Yuk Yin “Loretta” Lam Cheng, Victoria Tsui and others intentionally caused to be submitted for closing at Abacus Federal Savings Bank loan application paperwork containing false information in connection with a \$315,000 mortgage.

29. On or about February 14, 2008, in New York County, defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam, Wai Ching “Alice” Wong, and others intentionally caused to be submitted for closing at Abacus Federal Savings Bank loan application paperwork containing false information in connection with a \$533,000 mortgage.

30. On or about February 15, 2008, in New York County, defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam, Wen Fang “Fanny” Wang, Wai Ching “Alice” Wong, Yi Yi Zhao and others intentionally caused to be submitted for closing at Abacus Federal Savings Bank loan application paperwork containing false information in connection with a \$340,000 mortgage.

31. On or about July 15, 2008, in New York County, defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam, Wen Fang “Fanny” Wang, Wai Ching “Alice” Wong, and others intentionally caused to be submitted for closing at Abacus Federal Savings Bank loan application paperwork containing false information in connection with a \$335,000 mortgage.

32. On or about September 25, 2008, in New York County, defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam, Wai Ching “Alice” Wong and others intentionally caused to be submitted for closing at Abacus Federal Savings Bank loan application paperwork containing false information in connection with a \$398,000 mortgage.

33. On or about October 20, 2008, in New York County, defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam and others intentionally caused to be submitted for closing at Abacus Federal Savings Bank loan application paperwork containing false information in connection with a \$600,000 mortgage.

34. On or about October 20, 2008, in New York County, defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam, Wen Fang

“Fanny” Wang, Wai Ching “Alice” Wong and others intentionally caused to be submitted for closing at Abacus Federal Savings Bank loan application paperwork containing false information in connection with a \$450,000 mortgage.

35. On or about December 8, 2008, in New York County, defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam, Wai Ching “Alice” Wong and others intentionally caused to be submitted for closing at Abacus Federal Savings Bank loan application paperwork containing false information in connection with a \$492,000 mortgage.

36. On or about December 22, 2008, in New York County, defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam, Wai Ching “Alice” Wong and others intentionally caused to be submitted for closing at Abacus Federal Savings Bank loan application paperwork containing false information in connection with a \$381,000 mortgage.

37. On or about March 26, 2009, in New York County, defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam and others intentionally caused to be submitted for closing at Abacus Federal Savings Bank loan application paperwork containing false information in connection with a \$230,000 mortgage.

38. On or about March 27, 2009, in New York County, defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam, Wen Fang “Fanny” Wang, Yi Yi Zhao and others intentionally caused to be submitted for closing at Abacus Federal Savings Bank loan application paperwork containing false information in connection with a \$577,000 mortgage.

39. On or about May 19, 2009, in New York County, defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam, Wen Fang “Fanny” Wang, Victoria Tsui and others intentionally caused to be submitted for

closing at Abacus Federal Savings Bank loan application paperwork containing false information in connection with a \$300,000 mortgage.

40. On or about June 4, 2009, in New York County, defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam, Ying Chuan “Shelly” Wang, and others intentionally caused to be submitted for closing at Abacus Federal Savings Bank loan application paperwork containing false information in connection with a \$130,000 mortgage.

41. On or about June 5, 2009, in New York County, defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam, Wen Fang “Fanny” Wang, Victoria Tsui and others intentionally caused to be submitted for closing at Abacus Federal Savings Bank loan application paperwork containing false information in connection with a \$200,000 mortgage.

42. On or about June 8, 2009, in New York County, defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam, Ying Chuan “Shelly” Wang and others intentionally caused to be submitted for closing at Abacus Federal Savings Bank loan application paperwork containing false information in connection with a \$400,000 mortgage.

43. On or about June 10, 2009, in New York County, defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam Wai Ching “Alice” Wong, Victoria Tsui and others intentionally caused to be submitted for closing at Abacus Federal Savings Bank loan application paperwork containing false information in connection with a \$499,000 mortgage.

44. On or about June 16, 2009, in New York County, defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam, Wen Fang “Fanny” Wang, Victoria Tsui and others intentionally caused to be submitted for closing at Abacus Federal Savings Bank loan application paperwork containing false information in connection with a \$490,000 mortgage.

45. On or about June 18, 2009, in New York County, defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam, Wen Fang “Fanny” Wang, Yi Yi Zhao and others intentionally caused to be submitted for closing at Abacus Federal Savings Bank loan application paperwork containing false information in connection with a \$530,000 mortgage.

46. On or about June 29, 2009, in New York County, defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam, Yi Yi Zhao and others intentionally caused to be submitted for closing at Abacus Federal Savings Bank loan application paperwork containing false information in connection with a \$493,000 mortgage.

47. On or about December 2, 2009, in New York County, defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam, Victoria Tsui and others intentionally caused to be submitted for closing at Abacus Federal Savings Bank loan application paperwork containing false information in connection with a \$350,000 mortgage.

48. On or about December 11, 2009, in New York County, defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam, Wai Ching “Alice” Wong and others intentionally caused to be submitted for closing at Abacus Federal Savings Bank loan application paperwork containing false information in connection with a \$533,000 mortgage.

49. On or about January 28, 2010, in New York County, defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam, Victoria Tsui and others intentionally caused to be submitted for closing at Abacus Federal Savings Bank loan application paperwork containing false information in connection with a \$180,000 mortgage.

SECOND COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank and Yiu Wah Wong, of the crime of **SCHEME TO DEFRAUD IN THE FIRST DEGREE**, in violation of Penal Law §190.65(1)(b), committed as follows:

The defendants, Abacus Federal Savings Bank and Yiu Wah Wong, in the County of New York and elsewhere, during the period from on or about May 11, 2005 to on or about February 3, 2010, 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 person, to wit, Fannie Mae.

THIRD COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank and Yiu Wah Wong, of the crime of a violation of General Business Law §352-c(5) ("**MARTIN ACT**"), committed as follows:

The defendants Abacus Federal Savings Bank and Yiu Wah Wong, in the County of New York and elsewhere, during the period from on or about May 11, 2005 to on or about February 3, 2010, intentionally engaged in a scheme constituting an ongoing course of conduct with intent to defraud ten or more persons and to obtain property from ten or more persons by false and fraudulent pretenses, representations and promises and so obtained property from one or more of such persons while engaged in, inducing and promoting the issuance, distribution, exchange, sale, negotiation and purchase of a security, to wit, residential mortgage loans.

**FRAUDULENT PROPERTY CLOSINGS**

**60th Avenue, Flushing NY 11355**

FOURTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam, Jie Qiong “Michelle” Nan and Yuk Yin “Loretta” Lam Cheng, of the crime of **GRAND LARCENY IN THE SECOND DEGREE**, in violation of Penal Law §155.40(1), committed as follows:

The defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam, Jie Qiong “Michelle” Nan and Yuk Yin “Loretta” Lam Cheng, in the County of New York and elsewhere, from on or about January 26, 2007 to on or about May 30, 2007, stole property from Fannie Mae and the value of the property exceeded fifty thousand dollars.

FIFTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam, Jie Qiong “Michelle” Nan and Yuk Yin “Loretta” Lam Cheng, of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law §175.10, committed as follows:

The defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam, Jie Qiong “Michelle” Nan and Yuk Yin “Loretta” Lam Cheng, in the County of New York and elsewhere, from on or about January 26, 2007 to on or about May 30, 2007, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry into the business records of an enterprise, Abacus Federal Savings Bank, to wit, a Verification of Employment for Min Chen.

SIXTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung



“Raymond” Tam, Jie Qiong “Michelle” Nan and Yuk Yin “Loretta” Lam Cheng, of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law §175.10, committed as follows:

The defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam, Jie Qiong “Michelle” Nan and Yuk Yin “Loretta” Lam Cheng, in the County of New York and elsewhere, from on or about January 26, 2007 to on or about May 30, 2007, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry into the business records of an enterprise, Abacus Federal Savings Bank, to wit, a Gift Letter from Cunfei Nan in the amount of \$205,268.

SEVENTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam, Jie Qiong “Michelle” Nan and Yuk Yin “Loretta” Lam Cheng, of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law §175.10, committed as follows:

The defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam, Jie Qiong “Michelle” Nan and Yuk Yin “Loretta” Lam Cheng, in the County of New York and elsewhere, from on or about January 26, 2007 to on or about May 30, 2007, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry into the business records of an enterprise, Abacus Federal Savings Bank, to wit, a Gift Letter from Chen Jie in the amount of \$99,561.

EIGHTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank and Yiu Wah Wong, of the crime of a violation of General Business Law §352-c(6) (“**MARTIN ACT**”), committed as follows:

The defendants Abacus Federal Savings Bank and Yiu Wah Wong, in the County of New York and elsewhere, on or about May 30, 2007, intentionally engaged in fraud, deception, concealment, suppression, false pretense and fictitious and pretended purchase and sale, and with intent to deceive and defraud, made material false representations and statements, while engaged in inducing and promoting the issuance, distribution, exchange, sale, negotiation and purchase within and from New York of a security, to wit, residential mortgage loans, and thereby wrongfully obtained property with a value in excess of \$250.00.

**Henry Street, Unit 503, New York, NY 10002**

NINTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam, Wen Fang “Fanny” Wang, Yuk Yin “Loretta” Lam Cheng and Yi Yi Zhao, of the crime of **GRAND LARCENY IN THE SECOND DEGREE**, in violation of Penal Law §155.40(1), committed as follows:

The defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam, Wen Fang “Fanny” Wang, Yuk Yin “Loretta” Lam Cheng and Yi Yi Zhao, in the County of New York and elsewhere, from on or about March 16, 2007 to on or about June 1, 2007, stole property from Fannie Mae and the value of the property exceeded fifty thousand dollars.

TENTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam, Wen Fang “Fanny” Wang, Yuk Yin “Loretta” Lam Cheng and Yi Yi Zhao, of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law §175.10, committed as follows:

The defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam, Wen Fang “Fanny” Wang, Yuk Yin “Loretta” Lam Cheng and Yi Yi Zhao, in the County of New York and elsewhere, from on or about March 16, 2007 to on or about June 1, 2007, with intent to defraud and to commit another

crime and to aid and conceal the commission thereof, made and caused to be made a false entry into the business records of an enterprise, Abacus Federal Savings Bank, to wit, a Verification of Employment for Siu Wa Tsoi.

ELEVENTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam, Wen Fang “Fanny” Wang, Yuk Yin “Loretta” Lam Cheng and Yi Yi Zhao, of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law §175.10, committed as follows:

The defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam, Wen Fang “Fanny” Wang, Yuk Yin “Loretta” Lam Cheng and Yi Yi Zhao, in the County of New York and elsewhere, from on or about March 16, 2007 to on or about June 1, 2007, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry into the business records of an enterprise, Abacus Federal Savings Bank, to wit, a loan application.

TWELFTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank and Yiu Wah Wong, of the crime of a violation of General Business Law §352-c(6) (“**MARTIN ACT**”), committed as follows:

The defendants Abacus Federal Savings Bank and Yiu Wah Wong, in the County of New York and elsewhere, on or about June 1, 2007, intentionally engaged in fraud, deception, concealment, suppression, false pretense and fictitious and pretended purchase and sale, and with intent to deceive and defraud, made material false representations and statements, while engaged in inducing and promoting the issuance, distribution, exchange, sale, negotiation and purchase within and from New York of a security, to wit, residential mortgage loans, and thereby wrongfully obtained property with a value in excess of \$250.00.

**7th Avenue, Brooklyn, NY 11220**

THIRTEENTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam and Yuk Yin “Loretta” Lam Cheng, of the crime of **GRAND LARCENY IN THE SECOND DEGREE**, in violation of Penal Law §155.40(1), committed as follows:

The defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam and Yuk Yin “Loretta” Lam Cheng, in the County of New York and elsewhere, from on or about June 20, 2007 to on or about October 2, 2007, stole property from Fannie Mae and the value of the property exceeded fifty thousand dollars.

FOURTEENTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam and Yuk Yin “Loretta” Lam Cheng, of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law §175.10, committed as follows:

The defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam and Yuk Yin “Loretta” Lam Cheng, in the County of New York and elsewhere, from on or about June 20, 2007 to on or about October 2, 2007, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry into the business records of an enterprise, Abacus Federal Savings Bank, to wit, a Gift Letter from Bao Tai Huang in the amount of \$77,000.

FIFTEENTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank and Yiu Wah Wong, of the crime of a violation of General Business Law §352-c(6) (“**MARTIN ACT**”), committed as follows:

The defendants Abacus Federal Savings Bank and Yiu Wah Wong, in the County of New York and elsewhere, on or about October 2, 2007, intentionally engaged in fraud, deception, concealment, suppression, false pretense and fictitious and pretended purchase and sale, and with intent to deceive and defraud, made material false representations and statements, while engaged in inducing and promoting the issuance, distribution, exchange, sale, negotiation and purchase within and from New York of a security, to wit, residential mortgage loans, and thereby wrongfully obtained property with a value in excess of \$250.00.

**14th Road, College Point, NY 11356**

SIXTEENTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam, Wai Ching “Alice” Wong and Yi Yi Zhao, of the crime of **GRAND LARCENY IN THE SECOND DEGREE**, in violation of Penal Law §155.40(1), committed as follows:

The defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam, Wai Ching “Alice” Wong and Yi Yi Zhao, in the County of New York and elsewhere, from on or about November 13, 2007 to on or about January 11, 2008, stole property from Fannie Mae and the value of the property exceeded fifty thousand dollars.

SEVENTEENTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam, Wai Ching “Alice” Wong and Yi Yi Zhao, of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law §175.10, committed as follows:

The defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam, Wai Ching “Alice” Wong and Yi Yi Zhao, in the County of New York and elsewhere, from on or about November 13, 2007 to on or about January 11, 2008, with intent to defraud and to commit another crime and to aid and conceal

the commission thereof, made and caused to be made a false entry into the business records of an enterprise, Abacus Federal Savings Bank, to wit, a Gift Letter from Sheng Len Hu in the amount of \$120,643.16.

EIGHTEENTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam, Wai Ching “Alice” Wong and Yi Yi Zhao, of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law §175.10, committed as follows:

The defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam, Wai Ching “Alice” Wong and Yi Yi Zhao, in the County of New York and elsewhere, from on or about November 13, 2007 to on or about January 11, 2008 with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry into the business records of an enterprise, Abacus Federal Savings Bank, to wit, a Gift Letter from Li Fei Li in the amount of \$68,909.06.

NINETEENTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank and Yiu Wah Wong, of the crime of a violation of General Business Law §352-c(6) (“**MARTIN ACT**”), committed as follows:

The defendants Abacus Federal Savings Bank and Yiu Wah Wong, in the County of New York and elsewhere, on or about January 11, 2008, intentionally engaged in fraud, deception, concealment, suppression, false pretense and fictitious and pretended purchase and sale, and with intent to deceive and defraud, made material false representations and statements, while engaged in inducing and promoting the issuance, distribution, exchange, sale, negotiation and purchase within and from New York of a security, to wit, residential mortgage loans, and thereby wrongfully obtained property with a value in excess of \$250.00.

**Leavitt Street, Flushing, NY 11354**

TWENTIETH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam and Wai Ching “Alice” Wong, of the crime of **GRAND LARCENY IN THE SECOND DEGREE**, in violation of Penal Law §155.40(1), committed as follows:

The defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam and Wai Ching “Alice” Wong, in the County of New York and elsewhere, from on or about December 10, 2007 to on or about January 18, 2008, stole property from Fannie Mae and the value of the property exceeded fifty thousand dollars.

TWENTY-FIRST COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam and Wai Ching “Alice” Wong, of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law §175.10, committed as follows:

The defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam and Wai Ching “Alice” Wong, in the County of New York and elsewhere, from on or about December 10, 2007 to on or about January 18, 2008, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry into the business records of an enterprise, Abacus Federal Savings Bank, to wit, a Verification of Employment for Ming Chen.

TWENTY-SECOND COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam and Wai Ching “Alice” Wong, of the crime of **FALSIFYING**

**BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law §175.10, committed as follows:

The defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam and Wai Ching “Alice” Wong, in the County of New York and elsewhere, from on or about December 10, 2007 to on or about January 18, 2008, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry into the business records of an enterprise, Abacus Federal Savings Bank, to wit, a Verification of Employment for Yu Ying Fu.

TWENTY-THIRD COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam and Wai Ching “Alice” Wong, of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law §175.10, committed as follows:

The defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam and Wai Ching “Alice” Wong, in the County of New York and elsewhere, from on or about December 10, 2007 to on or about January 18, 2008, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry into the business records of an enterprise, Abacus Federal Savings Bank, to wit, a Gift Letter from Yong Xia in the amount of \$93,191.

TWENTY-FOURTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam and Wai Ching “Alice” Wong, of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law §175.10, committed as follows:

The defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam and Wai Ching “Alice” Wong, in the County of New York and



elsewhere, from on or about December 10, 2007 to on or about January 18, 2008, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry into the business records of an enterprise, Abacus Federal Savings Bank, to wit, a Gift Letter from Jane S Ham in the amount of \$24,800.

TWENTY-FIFTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam and Wai Ching “Alice” Wong, of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law §175.10, committed as follows:

The defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam and Wai Ching “Alice” Wong, in the County of New York and elsewhere, from on or about December 10, 2007 to on or about January 18, 2008, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry into the business records of an enterprise, Abacus Federal Savings Bank, to wit, a Gift Letter from Bing Qiu Fu in the amount of \$166,000.

TWENTY-SIXTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank and Yiu Wah Wong, of the crime of a violation of General Business Law §352-c(6) (“**MARTIN ACT**”), committed as follows:

The defendants Abacus Federal Savings Bank and Yiu Wah Wong, in the County of New York and elsewhere, on or about January 18, 2008, intentionally engaged in fraud, deception, concealment, suppression, false pretense and fictitious and pretended purchase and sale, and with intent to deceive and defraud, made material false representations and statements, while engaged in inducing and promoting the issuance, distribution, exchange, sale, negotiation and purchase within and from New York of a security, to wit, residential mortgage loans, and thereby wrongfully obtained property with a value in excess of \$250.00.

**Hillyer Street, Elmhurst NY 11373**

TWENTY-SEVENTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam and Yuk Yin “Loretta” Lam Cheng, of the crime of **GRAND LARCENY IN THE SECOND DEGREE**, in violation of Penal Law §155.40(1), committed as follows:

The defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam and Yuk Yin “Loretta” Lam Cheng, in the County of New York and elsewhere, from on or about September 14, 2007 to on or about February 15, 2008, stole property from Fannie Mae and the value of the property exceeded fifty thousand dollars.

TWENTY-EIGHTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam and Yuk Yin “Loretta” Lam Cheng, of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law §175.10, committed as follows:

The defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam and Yuk Yin “Loretta” Lam Cheng, in the County of New York and elsewhere, from on or about September 14, 2007 to on or about February 15, 2008, with intent to defraud and to commit another crime and to aid and conceal the

commission thereof, made and caused to be made a false entry into the business records of an enterprise, Abacus Federal Savings Bank, to wit, a Verification of Employment for Ya Rong Zheng.

TWENTY-NINTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam and Yuk Yin “Loretta” Lam Cheng, of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law §175.10, committed as follows:

The defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam and Yuk Yin “Loretta” Lam Cheng, in the County of New York and elsewhere, from on or about September 14, 2007 to on or about February 15, 2008, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry into the business records of an enterprise, Abacus Federal Savings Bank, to wit, a Gift Letter from Zhi Jin Lin in the amount of \$7,000.

THIRTIETH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam and Yuk Yin “Loretta” Lam Cheng, of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law §175.10, committed as follows:

The defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam and Yuk Yin “Loretta” Lam Cheng, in the County of New York and elsewhere, from on or about September 14, 2007 to on or about February 15, 2008, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry into the business records of an enterprise, Abacus Federal Savings Bank, to wit, a Gift Letter from Zhi Jin Lin in the amount of \$79,500.

THIRTY-FIRST COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam and Yuk Yin “Loretta” Lam Cheng, of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law §175.10, committed as follows:

The defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam and Yuk Yin “Loretta” Lam Cheng, in the County of New York and elsewhere, from on or about September 14, 2007 to on or about February 15, 2008, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry into the business records of an enterprise, Abacus Federal Savings Bank, to wit, a Gift Letter from Zhi Jin Lin in the amount of \$69,000.

THIRTY-SECOND COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank and Yiu Wah Wong, of the crime of a violation of General Business Law §352-c(6) (“**MARTIN ACT**”), committed as follows:

The defendants Abacus Federal Savings Bank and Yiu Wah Wong, in the County of New York and elsewhere, on or about February 15, 2008, intentionally engaged in fraud, deception, concealment, suppression, false pretense and fictitious and pretended purchase and sale, and with intent to deceive and defraud, made material false representations and statements, while engaged in inducing and promoting the issuance, distribution, exchange, sale, negotiation and purchase within and from New York of a security, to wit, residential mortgage loans, and thereby wrongfully obtained property with a value in excess of \$250.00.

**West 37th Street, Brooklyn, NY 11224**

THIRTY-THIRD COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung

“Raymond” Tam, Yuk Yin “Loretta” Lam Cheng and Victoria Tsui, of the crime of **GRAND LARCENY IN THE SECOND DEGREE**, in violation of Penal Law §155.40(1), committed as follows:

The defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam, Yuk Yin “Loretta” Lam Cheng and Victoria Tsui, in the County of New York and elsewhere, from on or about October 12, 2007 to on or about February 20, 2008, stole property from Fannie Mae and the value of the property exceeded fifty thousand dollars.

THIRTY-FOURTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam, Yuk Yin “Loretta” Lam Cheng and Victoria Tsui, of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law §175.10, committed as follows:

The defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam, Yuk Yin “Loretta” Lam Cheng and Victoria Tsui, in the County of New York and elsewhere, from on or about October 12, 2007 to on or about February 20, 2008, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry into the business records of an enterprise, Abacus Federal Savings Bank, to wit, a Verification of Employment for Soo Fun Wong.

THIRTY-FIFTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam, Yuk Yin “Loretta” Lam Cheng and Victoria Tsui, of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law §175.10, committed as follows:

The defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam, Yuk Yin “Loretta” Lam Cheng and Victoria Tsui, in the County of New York and elsewhere, from on or about October 12, 2007 to on or about Febru-

ary 20, 2008, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry into the business records of an enterprise, Abacus Federal Savings Bank, to wit, a Gift Letter from Shing Won Lam in the amount of \$19,000.

THIRTY-SIXTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank and Yiu Wah Wong, of the crime of a violation of General Business Law §352-c(6) (“**MARTIN ACT**”), committed as follows:

The defendants Abacus Federal Savings Bank and Yiu Wah Wong, in the County of New York and elsewhere, on or about February 20, 2008, intentionally engaged in fraud, deception, concealment, suppression, false pretense and fictitious and pretended purchase and sale, and with intent to deceive and defraud, made material false representations and statements, while engaged in inducing and promoting the issuance, distribution, exchange, sale, negotiation and purchase within and from New York of a security, to wit, residential mortgage loans, and thereby wrongfully obtained property with a value in excess of \$250.00.

**33rd Street, Long Island City, NY 11102**

THIRTY-SEVENTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam and Wai Ching “Alice” Wong, of the crime of **GRAND LARCENY IN THE SECOND DEGREE**, in violation of Penal Law §155.40(1), committed as follows:

The defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam and Wai Ching “Alice” Wong, in the County of New York and elsewhere, from on or about December 4, 2007 to on or about February 20, 2008, stole property from Fannie Mae and the value of the property exceeded fifty thousand dollars.

THIRTY-EIGHTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam and Wai Ching “Alice” Wong, of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law §175.10, committed as follows:

The defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam and Wai Ching “Alice” Wong, in the County of New York and elsewhere, from on or about December 4, 2007 to on or about February 20, 2008, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry into the business records of an enterprise, Abacus Federal Savings Bank, to wit, a Gift Letter from Nikki Aw in the amount of \$100,000.

THIRTY-NINTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam and Wai Ching “Alice” Wong, of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law §175.10, committed as follows:

The defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam and Wai Ching “Alice” Wong, in the County of New York and elsewhere, from on or about December 4, 2007 to on or about February 20, 2008, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry into the business records of an enterprise, Abacus Federal Savings Bank, to wit, a Gift Letter from Xiang Gang Zhang in the amount of \$5,115.

FORTIETH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank and Yiu Wah Wong, of the crime of a violation of General Business Law §352-c(6) (“**MARTIN ACT**”), committed as follows:

The defendants Abacus Federal Savings Bank and Yiu Wah Wong, in the County of New York and elsewhere, on or about February 20, 2008, intentionally engaged in fraud, deception, concealment, suppression, false pretense and fictitious and pretended purchase and sale, and with intent to deceive and defraud, made material false representations and statements, while engaged in inducing and promoting the issuance, distribution, exchange, sale, negotiation and purchase within and from New York of a security, to wit, residential mortgage loans, and thereby wrongfully obtained property with a value in excess of \$250.00.

**185th St. Fresh Meadows, NY 11365**

FORTY-FIRST COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam, Wen Fang “Fanny” Wang, Wai Ching “Alice” Wong and Yi Yi Zhao, of the crime of **GRAND LARCENY IN THE SECOND DEGREE**, in violation of Penal Law §155.40(1), committed as follows:

The defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam, Wen Fang “Fanny” Wang, Wai Ching “Alice” Wong and Yi Yi Zhao, in the County of New York and elsewhere, from on or about December 7, 2007 to on or about February 26, 2008, stole property from Fannie Mae and the value of the property exceeded fifty thousand dollars.

FORTY-SECOND COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam, Wen Fang “Fanny” Wang, Wai Ching “Alice” Wong and Yi Yi



Zhao, of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law §175.10, committed as follows:

The defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam, Wen Fang “Fanny” Wang, Wai Ching “Alice” Wong and Yi Yi Zhao, in the County of New York and elsewhere, from on or about December 7, 2007 to on or about February 26, 2008, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry into the business records of an enterprise, Abacus Federal Savings Bank, to wit, a Verification of Employment for Li Fang Que.

FORTY-THIRD COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam, Wen Fang “Fanny” Wang, Wai Ching “Alice” Wong and Yi Yi Zhao, of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law §175.10, committed as follows:

The defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam, Wen Fang “Fanny” Wang, Wai Ching “Alice” Wong and Yi Yi Zhao, in the County of New York and elsewhere, from on or about December 7, 2007 to on or about February 26, 2008, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry into the business records of an enterprise, Abacus Federal Savings Bank, to wit, a Gift Letter from Li Ya Que Wang in the amount of \$118,000.

FORTY-FOURTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank and Yiu Wah Wong, of the crime of a violation of General Business Law §352-c(6) (“**MARTIN ACT**”), committed as follows:

The defendants Abacus Federal Savings Bank and Yiu Wah Wong, in the County of New York and elsewhere, on or about February 26, 2008, intentionally engaged in fraud, deception, concealment, suppression, false pretense and fictitious

and pretended purchase and sale, and with intent to deceive and defraud, made material false representations and statements, while engaged in inducing and promoting the issuance, distribution, exchange, sale, negotiation and purchase within and from New York of a security, to wit, residential mortgage loans, and thereby wrongfully obtained property with a value in excess of \$250.00.

**O'Connell Court, Elmhurst, NY 11373**

FORTY-FIFTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung "Raymond" Tam, Wen Fang "Fanny" Wang and Wai Ching "Alice" Wong, of the crime of **GRAND LARCENY IN THE SECOND DEGREE**, in violation of Penal Law §155.40(1), committed as follows:

The defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung "Raymond" Tam, Wen Fang "Fanny" Wang and Wai Ching "Alice" Wong, in the County of New York and elsewhere, from on or about April 17, 2008 to on or about July 22, 2008, stole property from Fannie Mae and the value of the property exceeded fifty thousand dollars.

FORTY-SIXTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung "Raymond" Tam, Wen Fang "Fanny" Wang and Wai Ching "Alice" Wong, of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law §175.10, committed as follows:

The defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung "Raymond" Tam, Wen Fang "Fanny" Wang and Wai Ching "Alice" Wong, in the County of New York and elsewhere, from on or about April 17, 2008 to on or about July 22, 2008, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry into the business records of an enterprise, Abacus Federal Savings Bank, to wit, a Verification of Employment for Da Wei Ye.

FORTY-SEVENTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam, Wen Fang “Fanny” Wang and Wai Ching “Alice” Wong, of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law §175.10, committed as follows:

The defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam, Wen Fang “Fanny” Wang and Wai Ching “Alice” Wong, in the County of New York and elsewhere, from on or about April 17, 2008 to on or about July 22, 2008, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry into the business records of an enterprise, Abacus Federal Savings Bank, to wit, a Gift Letter from Da Rui Ye in the amount of \$36,000.

FORTY-EIGHTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam, Wen Fang “Fanny” Wang and Wai Ching “Alice” Wong, of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law §175.10, committed as follows:

The defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam, Wen Fang “Fanny” Wang and Wai Ching “Alice” Wong, in the County of New York and elsewhere, from on or about April 17, 2008 to on or about July 22, 2008, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry into the business records of an enterprise, Abacus Federal Savings Bank, to wit, a Gift Letter from Lian Xia Zhong in the amount of \$18,000.

FORTY-NINTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank and Yiu Wah Wong, of the crime of a violation of General Business Law §352-c(6) (“**MARTIN ACT**”), committed as follows:

The defendants Abacus Federal Savings Bank and Yiu Wah Wong, in the County of New York and elsewhere, on or about July 22, 2008, intentionally engaged in fraud, deception, concealment, suppression, false pretense and fictitious and pretended purchase and sale, and with intent to deceive and defraud, made material false representations and statements, while engaged in inducing and promoting the issuance, distribution, exchange, sale, negotiation and purchase within and from New York of a security, to wit, residential mortgage loans, and thereby wrongfully obtained property with a value in excess of \$250.00.

**37th Ave., Flushing, NY 11354**

FIFTIETH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam and Wai Ching “Alice” Wong, of the crime of **GRAND LARCENY IN THE SECOND DEGREE**, in violation of Penal Law §155.40(1), committed as follows:

The defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam and Wai Ching “Alice” Wong, in the County of New York and elsewhere, from on or about August 6, 2008 to on or about October 6, 2008, stole property from Fannie Mae and the value of the property exceeded fifty thousand dollars.

FIFTY-FIRST COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam and Wai Ching “Alice” Wong, of the crime of **FALSIFYING**

**BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law §175.10, committed as follows:

The defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam and Wai Ching “Alice” Wong, in the County of New York and elsewhere, from on or about August 6, 2008 to on or about October 6, 2008, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry into the business records of an enterprise, Abacus Federal Savings Bank, to wit, a Verification of Employment for Bei Bei Jin indicating a monthly income of \$5,730.

FIFTY-SECOND COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam and Wai Ching “Alice” Wong, of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law §175.10, committed as follows:

The defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam and Wai Ching “Alice” Wong, in the County of New York and elsewhere, from on or about August 6, 2008 to on or about October 6, 2008, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry into the business records of an enterprise, Abacus Federal Savings Bank, to wit, a Gift Letter from Zhong Yi Jin in the amount of \$69,949.40.

FIFTY-THIRD COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam and Wai Ching “Alice” Wong, of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law §175.10, committed as follows:

The defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam and Wai Ching “Alice” Wong, in the County of New York and

elsewhere, from on or about August 6, 2008 to on or about October 6, 2008, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry into the business records of an enterprise, Abacus Federal Savings Bank, to wit, a Gift Letter from Zhong Yi Jin in the amount of \$43,880.

FIFTY-FOURTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam and Wai Ching “Alice” Wong, of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law §175.10, committed as follows:

The defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam and Wai Ching “Alice” Wong, in the County of New York and elsewhere, from on or about August 6, 2008 to on or about October 6, 2008, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry into the business records of an enterprise, Abacus Federal Savings Bank, to wit, a Gift Letter from Shaoqiu Jin in the amount of \$57,765.

FIFTY-FIFTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam and Wai Ching “Alice” Wong, of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law §175.10, committed as follows:

The defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam and Wai Ching “Alice” Wong, in the County of New York and elsewhere, from on or about August 6, 2008 to on or about October 6, 2008, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry into the business records of

an enterprise, Abacus Federal Savings Bank, to wit, a Gift Letter from Shaoqiu Jin in the amount of \$130,420.

FIFTY-SIXTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam and Wai Ching “Alice” Wong, of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law §175.10, committed as follows:

The defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam and Wai Ching “Alice” Wong, in the County of New York and elsewhere, from on or about August 6, 2008 to on or about October 6, 2008, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry into the business records of an enterprise, Abacus Federal Savings Bank, to wit, a Gift Letter from Benny Joseph in the amount of \$30,200.

FIFTY-SEVENTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank and Yiu Wah Wong, of the crime of a violation of General Business Law §352-c(6) (“**MARTIN ACT**”), committed as follows:

The defendants Abacus Federal Savings Bank and Yiu Wah Wong, in the County of New York and elsewhere, on or about October 6, 2008, intentionally engaged in fraud, deception, concealment, suppression, false pretense and fictitious and pretended purchase and sale, and with intent to deceive and defraud, made material false representations and statements, while engaged in inducing and promoting the issuance, distribution, exchange, sale, negotiation and purchase within and from New York of a security, to wit, residential mortgage loans, and thereby wrongfully obtained property with a value in excess of \$250.00.

**College Point Boulevard, College Point NY 11356**

FIFTY-EIGHTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank, Yiu Wah Wong and Wai Hung “Raymond” Tam, of the crime of **GRAND LARCENY IN THE SECOND DEGREE**, in violation of Penal Law §155.40(1), committed as follows:

The defendants Abacus Federal Savings Bank, Yiu Wah Wong and Wai Hung “Raymond” Tam, in the County of New York and elsewhere, from on or about September 17, 2008 to on or about October 24, 2008, stole property from Fannie Mae and the value of the property exceeded fifty thousand dollars.

FIFTY-NINTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank, Yiu Wah Wong and Wai Hung “Raymond” Tam, of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law §175.10, committed as follows:

The defendants Abacus Federal Savings Bank, Yiu Wah Wong and Wai Hung “Raymond” Tam, in the County of New York and elsewhere, from on or about September 17, 2008 to on or about October 24, 2008, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry into the business records of an enterprise, Abacus Federal Savings Bank, to wit, a Verification of Employment for Chao Qun Dai.

SIXTIETH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank, Yiu Wah Wong and Wai Hung “Raymond” Tam, of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law §175.10, committed as follows:

The defendants Abacus Federal Savings Bank, Yiu Wah Wong and Wai Hung “Raymond” Tam, in the County of New York and elsewhere, from on or about September 17, 2008 to on or about October 24, 2008, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made



and caused to be made a false entry into the business records of an enterprise, Abacus Federal Savings Bank, to wit, a Gift Letter from Mai Qiu Dai in the amount of \$112,070.

SIXTY-FIRST COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank, Yiu Wah Wong and Wai Hung “Raymond” Tam, of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law §175.10, committed as follows:

The defendants Abacus Federal Savings Bank, Yiu Wah Wong and Wai Hung “Raymond” Tam, in the County of New York and elsewhere, from on or about September 17, 2008 to on or about October 24, 2008, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry into the business records of an enterprise, Abacus Federal Savings Bank, to wit, a Gift Letter from Zhen Yuan Dai in the amount of \$27,712.

SIXTY-SECOND COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank and Yiu Wah Wong, of the crime of a violation of General Business Law §352-c(6) (“**MARTIN ACT**”), committed as follows:

The defendants Abacus Federal Savings Bank and Yiu Wah Wong, in the County of New York and elsewhere, on or about October 24, 2008, intentionally engaged in fraud, deception, concealment, suppression, false pretense and fictitious and pretended purchase and sale, and with intent to deceive and defraud, made material false representations and statements, while engaged in inducing and promoting the issuance, distribution, exchange, sale, negotiation and purchase within and from New York of a security, to wit, residential mortgage loans, and thereby wrongfully obtained property with a value in excess of \$250.00.

**97th Street, Ozone Park, NY 11417**

SIXTY-THIRD COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam, Wen Fang “Fanny” Wang and Wai Ching “Alice” Wong, of the crime of **GRAND LARCENY IN THE SECOND DEGREE**, in violation of Penal Law §155.40(1), committed as follows:

The defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam, Wen Fang “Fanny” Wang and Wai Ching “Alice” Wong, in the County of New York and elsewhere, from on or about May 19, 2008 to on or about October 27, 2008, stole property from Fannie Mae and the value of the property exceeded fifty thousand dollars.

SIXTY-FOURTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam, Wen Fang “Fanny” Wang and Wai Ching “Alice” Wong, of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law §175.10, committed as follows:

The defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam, Wen Fang “Fanny” Wang and Wai Ching “Alice” Wong, in the County of New York and elsewhere, from on or about May 19, 2008 to on or about October 27, 2008, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry into the business records of an enterprise, Abacus Federal Savings Bank, to wit, a Verification of Employment for Man Mei Wong.

SIXTY-FIFTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam, Wen Fang “Fanny” Wang and Wai Ching “Alice” Wong, of the

crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law §175.10, committed as follows:

The defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam, Wen Fang “Fanny” Wang and Wai Ching “Alice” Wong, in the County of New York and elsewhere, from on or about May 19, 2008 to on or about October 27, 2008, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry into the business records of an enterprise, Abacus Federal Savings Bank, to wit, a Verification of Employment for To Sau Yeung.

SIXTY-SIXTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam, Wen Fang “Fanny” Wang and Wai Ching “Alice” Wong, of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law §175.10, committed as follows:

The defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam, Wen Fang “Fanny” Wang and Wai Ching “Alice” Wong, in the County of New York and elsewhere, from on or about May 19, 2008 to on or about October 27, 2008, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry into the business records of an enterprise, Abacus Federal Savings Bank, to wit, a Gift Letter from Yeung Hung Tak in the amount of \$14,000.

SIXTY-SEVENTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam, Wen Fang “Fanny” Wang and Wai Ching “Alice” Wong, of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law §175.10, committed as follows:

The defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam, Wen Fang “Fanny” Wang and Wai Ching “Alice” Wong, in the

County of New York and elsewhere, from on or about May 19, 2008 to on or about October 27, 2008, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry into the business records of an enterprise, Abacus Federal Savings Bank, to wit, a Gift Letter from Yeung Hung Tak in the amount of \$15,000.

SIXTY-EIGHTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank and Yiu Wah Wong, of the crime of a violation of General Business Law §352-c(6) (“**MARTIN ACT**”), committed as follows:

The defendants Abacus Federal Savings Bank and Yiu Wah Wong, in the County of New York and elsewhere, on or about October 27, 2008, intentionally engaged in fraud, deception, concealment, suppression, false pretense and fictitious and pretended purchase and sale, and with intent to deceive and defraud, made material false representations and statements, while engaged in inducing and promoting the issuance, distribution, exchange, sale, negotiation and purchase within and from New York of a security, to wit, residential mortgage loans, and thereby wrongfully obtained property with a value in excess of \$250.00.

**55th St, Brooklyn NY 11220**

SIXTY-NINTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam and Wai Ching “Alice” Wong, of the crime of **GRAND LARCENY IN THE SECOND DEGREE**, in violation of Penal Law §155.40(1), committed as follows:

The defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam and Wai Ching “Alice” Wong, in the County of New York and elsewhere, from on or about May 14, 2008 to on or about December 19, 2008, stole property from Fannie Mae and the value of the property exceeded fifty thousand dollars.

SEVENTIETH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam and Wai Ching “Alice” Wong, of the crime of **RESIDENTIAL MORTGAGE FRAUD IN THE SECOND DEGREE**, in violation of Penal Law §187.20, committed as follows:

The defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam and Wai Ching “Alice” Wong, in the County of New York and elsewhere, from on or about November 1, 2008 to on or about December 19, 2008, knowingly and with intent to defraud, presented, caused to be presented, and prepared with knowledge and belief that it would be used in soliciting an applicant for, applying for, underwriting and closing a residential mortgage loan, a written statement which contained materially false information concerning a fact material thereto and thereby received proceeds and any other funds in the aggregate in excess of fifty thousand dollars.

SEVENTY-FIRST COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam and Wai Ching “Alice” Wong, of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law §175.10, committed as follows:

The defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam and Wai Ching “Alice” Wong, in the County of New York and elsewhere, from on or about May 14, 2008 to on or about December 19, 2008, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry into the business records of an enterprise, Abacus Federal Savings Bank, to wit, a Verification of Employment for Nai Chao Li.

SEVENTY-SECOND COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam and Wai Ching “Alice” Wong, of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law §175.10, committed as follows:

The defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam and Wai Ching “Alice” Wong, in the County of New York and elsewhere, from on or about May 14, 2008 to on or about December 19, 2008, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry into the business records of an enterprise, Abacus Federal Savings Bank, to wit, a Gift Letter from Shenglin Wang in the amount of \$58,000.

SEVENTY-THIRD COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam and Wai Ching “Alice” Wong, of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law §175.10, committed as follows:

The defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam and Wai Ching “Alice” Wong, in the County of New York and elsewhere, from on or about May 14, 2008 to on or about December 19, 2008, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry into the business records of an enterprise, Abacus Federal Savings Bank, to wit, a Gift Letter from Shenglin Wang in the amount of \$107,616.02.

SEVENTY-FOURTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam and Wai Ching “Alice” Wong, of the crime of **FALSIFYING**

**BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law §175.10, committed as follows:

The defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam and Wai Ching “Alice” Wong, in the County of New York and elsewhere, from on or about May 14, 2008 to on or about December 19, 2008, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry into the business records of an enterprise, Abacus Federal Savings Bank, to wit, a Gift Letter from Shenglin Wang in the amount of \$32,200.

SEVENTY-FIFTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam and Wai Ching “Alice” Wong, of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law §175.10, committed as follows:

The defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam and Wai Ching “Alice” Wong, in the County of New York and elsewhere, from on or about May 14, 2008 to on or about December 19, 2008, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry into the business records of an enterprise, Abacus Federal Savings Bank, to wit, a Gift Letter from Shenglin Wang in the amount of \$27,500.

SEVENTY-SIXTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank and Yiu Wah Wong, of the crime of a violation of General Business Law §352-c(6) (“**MARTIN ACT**”), committed as follows:

The defendants Abacus Federal Savings Bank and Yiu Wah Wong, in the County of New York and elsewhere, on or about December 19, 2008, intentionally engaged in fraud, deception, concealment, suppression, false pretense and fictitious

and pretended purchase and sale, and with intent to deceive and defraud, made material false representations and statements, while engaged in inducing and promoting the issuance, distribution, exchange, sale, negotiation and purchase within and from New York of a security, to wit, residential mortgage loans, and thereby wrongfully obtained property with a value in excess of \$250.00.

**Eldridge Street, New York, NY 10002**

SEVENTY-SEVENTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam and Wai Ching “Alice” Wong, of the crime of **GRAND LARCENY IN THE SECOND DEGREE**, in violation of Penal Law §155.40(1), committed as follows:

The defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam and Wai Ching “Alice” Wong, in the County of New York and elsewhere, from on or about October 21, 2008 to on or about January 13, 2009, stole property from Fannie Mae and the value of the property exceeded fifty thousand dollars.

SEVENTY-EIGHTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam and Wai Ching “Alice” Wong, of the crime of **RESIDENTIAL MORTGAGE FRAUD IN THE SECOND DEGREE**, in violation of Penal Law §187.20, committed as follows:

The defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam and Wai Ching “Alice” Wong, in the County of New York and elsewhere, from on or about November 1, 2008 to on or about January 13, 2009, knowingly and with intent to defraud, presented, caused to be presented, and prepared with knowledge and belief that it would be used in soliciting an applicant for, applying for, underwriting and closing a residential mortgage loan, a written statement which contained materially false information concerning a fact material thereto



and thereby received proceeds and any other funds in the aggregate in excess of fifty thousand dollars.

SEVENTY-NINTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam and Wai Ching “Alice” Wong, of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law §175.10, committed as follows:

The defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam and Wai Ching “Alice” Wong, in the County of New York and elsewhere, from on or about October 21, 2008 to on or about January 13, 2009, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry into the business records of an enterprise, Abacus Federal Savings Bank, to wit, a Verification of Employment for Jian Mei Guo.

EIGHTIETH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam and Wai Ching “Alice” Wong, of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law §175.10, committed as follows:

The defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam and Wai Ching “Alice” Wong, in the County of New York and elsewhere, from on or about October 21, 2008 to on or about January 13, 2009, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry into the business records of an enterprise, Abacus Federal Savings Bank, to wit, a Gift Letter from Hai Yang in the amount of \$7,000.

EIGHTY-FIRST COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam and Wai Ching “Alice” Wong, of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law §175.10, committed as follows:

The defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam and Wai Ching “Alice” Wong, in the County of New York and elsewhere, from on or about October 21, 2008 to on or about January 13, 2009, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry into the business records of an enterprise, Abacus Federal Savings Bank, to wit, a Gift Letter from Yu Shu Jiang in the amount of \$11,786.

EIGHTY-SECOND COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam and Wai Ching “Alice” Wong, of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law §175.10, committed as follows:

The defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam and Wai Ching “Alice” Wong, in the County of New York and elsewhere, from on or about October 21, 2008 to on or about January 13, 2009, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry into the business records of an enterprise, Abacus Federal Savings Bank, to wit, a Gift Letter from Ying Guo in the amount of \$8,000.

EIGHTY-THIRD COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank and Yiu Wah Wong, of the crime of a violation of General Business Law §352-c(6) (“**MARTIN ACT**”), committed as follows:

The defendants Abacus Federal Savings Bank and Yiu Wah Wong, in the County of New York and elsewhere, on or about January 13, 2009, intentionally engaged in fraud, deception, concealment, suppression, false pretense and fictitious and pretended purchase and sale, and with intent to deceive and defraud, made material false representations and statements, while engaged in inducing and promoting the issuance, distribution, exchange, sale, negotiation and purchase within and from New York of a security, to wit, residential mortgage loans, and thereby wrongfully obtained property with a value in excess of \$250.00.

**Mosel Avenue, Staten Island, NY 10304**

EIGHTY-FOURTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank, Yiu Wah Wong and Wai Hung “Raymond” Tam, of the crime of **GRAND LARCENY IN THE SECOND DEGREE**, in violation of Penal Law §155.40(1), committed as follows:

The defendants Abacus Federal Savings Bank, Yiu Wah Wong and Wai Hung “Raymond” Tam, in the County of New York and elsewhere, from on or about January 9, 2009 to on or about April 7, 2009, stole property from Fannie Mae and the value of the property exceeded fifty thousand dollars.

EIGHTY-FIFTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank, Yiu Wah Wong and Wai Hung “Raymond” Tam, of the crime of **RESIDENTIAL MORTGAGE FRAUD IN THE SECOND DEGREE**, in violation of Penal Law §187.20, committed as follows:

The defendants Abacus Federal Savings Bank, Yiu Wah Wong and Wai Hung “Raymond” Tam, in the County of New York and elsewhere, from on or about January 9, 2009 to on or about April 7, 2009, knowingly and with intent to defraud, presented, caused to be presented, and prepared with knowledge and belief that it would be used in soliciting an applicant for, applying for, underwriting and closing a residential mortgage loan, a written statement which contained materially false information concerning a fact material thereto and thereby received proceeds and any other funds in the aggregate in excess of fifty thousand dollars.

EIGHTY-SIXTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank, Yiu Wah Wong and Wai Hung “Raymond” Tam, of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law §175.10, committed as follows:

The defendants Abacus Federal Savings Bank, Yiu Wah Wong and Wai Hung “Raymond” Tam, in the County of New York and elsewhere, from on or about January 9, 2009 to on or about April 7, 2009, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry into the business records of an enterprise, Abacus Federal Savings Bank, to wit, a Gift Letter from Lai San Lam in the amount of \$20,000.

EIGHTY-SEVENTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank, Yiu Wah Wong and Wai Hung “Raymond” Tam, of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law §175.10, committed as follows:

The defendants Abacus Federal Savings Bank, Yiu Wah Wong and Wai Hung “Raymond” Tam, in the County of New York and elsewhere, from on or about January 9, 2009 to on or about April 7, 2009, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry into the business records of an enterprise, Abacus

Federal Savings Bank, to wit, a Gift Letter from Ruyi L Wong in the amount of \$28,000.

EIGHTY-EIGHTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank, Yiu Wah Wong and Wai Hung “Raymond” Tam, of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law §175.10, committed as follows:

The defendants Abacus Federal Savings Bank, Yiu Wah Wong and Wai Hung “Raymond” Tam, in the County of New York and elsewhere, from on or about January 9, 2009 to on or about April 7, 2009, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry into the business records of an enterprise, Abacus Federal Savings Bank, to wit, a Gift Letter from Kit L Wong in the amount of \$26,800.

EIGHTY-NINTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank and Yiu Wah Wong, of the crime of a violation of General Business Law §352-c(6) (“**MARTIN ACT**”), committed as follows:

The defendants Abacus Federal Savings Bank and Yiu Wah Wong, in the County of New York and elsewhere, on or about April 7, 2009, intentionally engaged in fraud, deception, concealment, suppression, false pretense and fictitious and pretended purchase and sale, and with intent to deceive and defraud, made material false representations and statements, while engaged in inducing and promoting the issuance, distribution, exchange, sale, negotiation and purchase within and from New York of a security, to wit, residential mortgage loans, and thereby wrongfully obtained property with a value in excess of \$250.00.

**60th Street, Brooklyn NY 11220**

NINETIETH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam, Wen Fang “Fanny” Wang and Yi Yi Zhao, of the crime of **GRAND LARCENY IN THE SECOND DEGREE**, in violation of Penal Law §155.40(1), committed as follows:

The defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam, Wen Fang “Fanny” Wang and Yi Yi Zhao, in the County of New York and elsewhere, from on or about October 30, 2008 to on or about April 10, 2009, stole property from Fannie Mae and the value of the property exceeded fifty thousand dollars.

NINETY-FIRST COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam, Wen Fang “Fanny” Wang and Yi Yi Zhao, of the crime of **RESIDENTIAL MORTGAGE FRAUD IN THE SECOND DEGREE**, in violation of Penal Law §187.20, committed as follows:

The defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam, Wen Fang “Fanny” Wang and Yi Yi Zhao, in the County of New York and elsewhere, from on or about November 1, 2008 to on or about April 10, 2009, knowingly and with intent to defraud, presented, caused to be presented, and prepared with knowledge and belief that it would be used in soliciting an applicant for, applying for, underwriting and closing a residential mortgage loan, a written statement which contained materially false information concerning a fact material thereto and thereby received proceeds and any other funds in the aggregate in excess of fifty thousand dollars.

NINETY-SECOND COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung

“Raymond” Tam, Wen Fang “Fanny” Wang and Yi Yi Zhao, of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law §175.10, committed as follows:

The defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam, Wen Fang “Fanny” Wang and Yi Yi Zhao, in the County of New York and elsewhere, from on or about October 30, 2008 to on or about April 10, 2009, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry into the business records of an enterprise, Abacus Federal Savings Bank, to wit, a Verification of Employment for Kim Wah Yeung.

NINETY-THIRD COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam, Wen Fang “Fanny” Wang and Yi Yi Zhao, of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law §175.10, committed as follows:

The defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam, Wen Fang “Fanny” Wang and Yi Yi Zhao, in the County of New York and elsewhere, from on or about October 30, 2008 to on or about April 10, 2009, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry into the business records of an enterprise, Abacus Federal Savings Bank, to wit, a Gift Letter from Fran Klin Cheung in the amount of \$8,000.

NINETY-FOURTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam, Wen Fang “Fanny” Wang and Yi Yi Zhao, of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law §175.10, committed as follows:

The defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam, Wen Fang “Fanny” Wang and Yi Yi Zhao, in the County of New York and elsewhere, from on or about October 30, 2008 to on or about April 10, 2009, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry into the business records of an enterprise, Abacus Federal Savings Bank, to wit, a Gift Letter from Tian Shu Chen in the amount of \$5,000.

NINETY-FIFTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam, Wen Fang “Fanny” Wang and Yi Yi Zhao, of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law §175.10, committed as follows:

The defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam, Wen Fang “Fanny” Wang and Yi Yi Zhao, in the County of New York and elsewhere, from on or about October 30, 2008 to on or about April 10, 2009, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry into the business records of an enterprise, Abacus Federal Savings Bank, to wit, a Gift Letter from Hong Bing Zheng in the amount of \$9,000.

NINETY-SIXTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam, Wen Fang “Fanny” Wang and Yi Yi Zhao, of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law §175.10, committed as follows:

The defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam, Wen Fang “Fanny” Wang and Yi Yi Zhao, in the County of New York and elsewhere, from on or about October 30, 2008 to on or about April 10, 2009, with intent to defraud and to commit another crime and to aid and conceal the



commission thereof, made and caused to be made a false entry into the business records of an enterprise, Abacus Federal Savings Bank, to wit, a Gift Letter from Hui Juan Liu in the amount of \$10,150.

NINETY-SEVENTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam, Wen Fang “Fanny” Wang and Yi Yi Zhao, of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law §175.10, committed as follows:

The defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam, Wen Fang “Fanny” Wang and Yi Yi Zhao, in the County of New York and elsewhere, from on or about October 30, 2008 to on or about April 10, 2009, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry into the business records of an enterprise, Abacus Federal Savings Bank, to wit, a Gift Letter from Cheng Jian in the amount of \$17,107.

NINETY-EIGHTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam, Wen Fang “Fanny” Wang and Yi Yi Zhao, of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law §175.10, committed as follows:

The defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam, Wen Fang “Fanny” Wang and Yi Yi Zhao, in the County of New York and elsewhere, from on or about October 30, 2008 to on or about April 10, 2009, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry into the business records of an enterprise, Abacus Federal Savings Bank, to wit, a Gift Letter from Yeung Jin Zharg in the amount of \$9,000.

NINETY-NINTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam, Wen Fang “Fanny” Wang and Yi Yi Zhao, of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law §175.10, committed as follows:

The defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam, Wen Fang “Fanny” Wang and Yi Yi Zhao, in the County of New York and elsewhere, from on or about October 30, 2008 to on or about April 10, 2009, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry into the business records of an enterprise, Abacus Federal Savings Bank, to wit, a Gift Letter from Sai Zhu Zheng in the amount of \$9,000.

ONE HUNDREDTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam, Wen Fang “Fanny” Wang and Yi Yi Zhao, of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law §175.10, committed as follows:

The defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam, Wen Fang “Fanny” Wang and Yi Yi Zhao, in the County of New York and elsewhere, from on or about October 30, 2008 to on or about April 10, 2009, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry into the business records of an enterprise, Abacus Federal Savings Bank, to wit, a Gift Letter from Wing Piu Lam in the amount of \$44,000.

ONE HUNDRED-FIRST COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam, Wen Fang “Fanny” Wang and Yi Yi Zhao, of the crime of **FAL-**

**SIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law §175.10, committed as follows:

The defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam, Wen Fang “Fanny” Wang and Yi Yi Zhao, in the County of New York and elsewhere, from on or about October 30, 2008 to on or about April 10, 2009, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry into the business records of an enterprise, Abacus Federal Savings Bank, to wit, a Gift Letter from Li Rui Hua in the amount of \$4,000.

ONE HUNDRED-SECOND COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank and Yiu Wah Wong, of the crime of a violation of General Business Law §352-c(6) (“**MARTIN ACT**”), committed as follows:

The defendants Abacus Federal Savings Bank and Yiu Wah Wong, in the County of New York and elsewhere, on or about April 10, 2009, intentionally engaged in fraud, deception, concealment, suppression, false pretense and fictitious and pretended purchase and sale, and with intent to deceive and defraud, made material false representations and statements, while engaged in inducing and promoting the issuance, distribution, exchange, sale, negotiation and purchase within and from New York of a security, to wit, residential mortgage loans, and thereby wrongfully obtained property with a value in excess of \$250.00.

**148th St., Flushing NY 11367**

ONE HUNDRED-THIRD COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam, Wen Fang “Fanny” Wang and Victoria Tsui, of the crime of **GRAND LARCENY IN THE SECOND DEGREE**, in violation of Penal Law §155.40(1), committed as follows:

The defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam, Wen Fang “Fanny” Wang and Victoria Tsui, in the County of New York and elsewhere, from on or about February 11, 2009 to on or about June 2, 2009, stole property from Fannie Mae and the value of the property exceeded fifty thousand dollars.

ONE HUNDRED-FOURTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam, Wen Fang “Fanny” Wang and Victoria Tsui, of the crime of **RESIDENTIAL MORTGAGE FRAUD IN THE SECOND DEGREE**, in violation of Penal Law §187.20, committed as follows:

The defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam, Wen Fang “Fanny” Wang and Victoria Tsui, in the County of New York and elsewhere, from on or about February 11, 2009 to on or about June 2, 2009, knowingly and with intent to defraud, presented, caused to be presented, and prepared with knowledge and belief that it would be used in soliciting an applicant for, applying for, underwriting and closing a residential mortgage loan, a written statement which contained materially false information concerning a fact material thereto and thereby received proceeds and any other funds in the aggregate in excess of fifty thousand dollars.

ONE HUNDRED-FIFTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam, Wen Fang “Fanny” Wang and Victoria Tsui, of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law §175.10, committed as follows:

The defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam, Wen Fang “Fanny” Wang and Victoria Tsui, in the County of New York and elsewhere, from on or about February 11, 2009 to on or about June 2, 2009, with intent to defraud and to commit another crime and to aid and conceal

the commission thereof, made and caused to be made a false entry into the business records of an enterprise, Abacus Federal Savings Bank, to wit, a Verification of Employment for Shan Yi Xue.

ONE HUNDRED-SIXTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam, Wen Fang “Fanny” Wang and Victoria Tsui, of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law §175.10, committed as follows:

The defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam, Wen Fang “Fanny” Wang and Victoria Tsui, in the County of New York and elsewhere, from on or about February 11, 2009 to on or about June 2, 2009, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry into the business records of an enterprise, Abacus Federal Savings Bank, to wit, a Gift Letter from Guat Eng Chin in the amount of \$12,000.

ONE HUNDRED-SEVENTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam, Wen Fang “Fanny” Wang and Victoria Tsui, of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law §175.10, committed as follows:

The defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam, Wen Fang “Fanny” Wang and Victoria Tsui, in the County of New York and elsewhere, from on or about February 11, 2009 to on or about June 2, 2009, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry into the business records of an enterprise, Abacus Federal Savings Bank, to wit, a Gift Letter from Xue Xiang Lin in the amount of \$26,000.

ONE HUNDRED-EIGHTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam, Wen Fang “Fanny” Wang and Victoria Tsui, of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law §175.10, committed as follows:

The defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam, Wen Fang “Fanny” Wang and Victoria Tsui, in the County of New York and elsewhere, from on or about February 11, 2009 to on or about June 2, 2009, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry into the business records of an enterprise, Abacus Federal Savings Bank, to wit, a Gift Letter from Xin Di Lin in the amount of \$25,000.

ONE HUNDRED-NINTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam, Wen Fang “Fanny” Wang and Victoria Tsui, of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law §175.10, committed as follows:

The defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam, Wen Fang “Fanny” Wang and Victoria Tsui, in the County of New York and elsewhere, from on or about February 11, 2009 to on or about June 2, 2009, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry into the business records of an enterprise, Abacus Federal Savings Bank, to wit, a Gift Letter from Gary Lim in the amount of \$24,500.

ONE HUNDRED-TENTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam, Wen Fang “Fanny” Wang and Victoria Tsui, of the crime of

**FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law §175.10, committed as follows:

The defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam, Wen Fang “Fanny” Wang and Victoria Tsui, in the County of New York and elsewhere, from on or about February 11, 2009 to on or about June 2, 2009, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry into the business records of an enterprise, Abacus Federal Savings Bank, to wit, a Gift Letter from Ming Quan Chen in the amount of \$22,000.

ONE HUNDRED-ELEVENTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam, Wen Fang “Fanny” Wang and Victoria Tsui, of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law §175.10, committed as follows:

The defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam, Wen Fang “Fanny” Wang and Victoria Tsui, in the County of New York and elsewhere, from on or about February 11, 2009 to on or about June 2, 2009, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry into the business records of an enterprise, Abacus Federal Savings Bank, to wit, a Gift Letter from Guang Yao Li in the amount of \$29,000.

ONE HUNDRED-TWELFTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam, Wen Fang “Fanny” Wang and Victoria Tsui, of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law §175.10, committed as follows:

The defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam, Wen Fang “Fanny” Wang and Victoria Tsui, in the County of

New York and elsewhere, from on or about February 11, 2009 to on or about June 2, 2009, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry into the business records of an enterprise, Abacus Federal Savings Bank, to wit, a Gift Letter from Guang Yu Xue in the amount of \$12,900.

ONE HUNDRED-THIRTEENTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank and Yiu Wah Wong, of the crime of a violation of General Business Law §352-c(6) (“**MARTIN ACT**”), committed as follows:

The defendants Abacus Federal Savings Bank and Yiu Wah Wong, in the County of New York and elsewhere, on or about June 2, 2009, intentionally engaged in fraud, deception, concealment, suppression, false pretense and fictitious and pretended purchase and sale, and with intent to deceive and defraud, made material false representations and statements, while engaged in inducing and promoting the issuance, distribution, exchange, sale, negotiation and purchase within and from New York of a security, to wit, residential mortgage loans, and thereby wrongfully obtained property with a value in excess of \$250.00.

**Pumpkin Lane, Clifton Park, NY 12065**

ONE HUNDRED-FOURTEENTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam and Ying Chuan “Shelley” Wang, of the crime of **GRAND LARCENY IN THE SECOND DEGREE**, in violation of Penal Law §155.40(1), committed as follows:

The defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam and Ying Chuan “Shelley” Wang, in the County of New York and elsewhere, from on or about March 12, 2009 to on or about June 15, 2009, stole property from Fannie Mae and the value of the property exceeded fifty thousand dollars.



ONE HUNDRED-FIFTEENTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam and Ying Chuan “Shelley” Wang, of the crime of **RESIDENTIAL MORTGAGE FRAUD IN THE SECOND DEGREE**, in violation of Penal Law §187.20, committed as follows:

The defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam and Ying Chuan “Shelley” Wang, in the County of New York and elsewhere, from on or about March 12, 2009 to on or about June 15, 2009, knowingly and with intent to defraud, presented, caused to be presented, and prepared with knowledge and belief that it would be used in soliciting an applicant for, applying for, underwriting and closing a residential mortgage loan, a written statement which contained materially false information concerning a fact material thereto and thereby received proceeds and any other funds in the aggregate in excess of fifty thousand dollars.

ONE HUNDRED-SIXTEENTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam and Ying Chuan “Shelley” Wang, of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law §175.10, committed as follows:

The defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam and Ying Chuan “Shelley” Wang, in the County of New York and elsewhere, from on or about March 12, 2009 to on or about June 15, 2009, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry into the business records of an enterprise, Abacus Federal Savings Bank, to wit, a Verification of Employment for You Na Zhang.

ONE HUNDRED-SEVENTEENTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam and Ying Chuan “Shelley” Wang, of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law §175.10, committed as follows:

The defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam and Ying Chuan “Shelley” Wang, in the County of New York and elsewhere, from on or about March 12, 2009 to on or about June 15, 2009, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry into the business records of an enterprise, Abacus Federal Savings Bank, to wit, a Gift Letter from Bi Zhen Liu in the amount of \$90,901.

ONE HUNDRED-EIGHTEENTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank and Yiu Wah Wong, of the crime of a violation of General Business Law §352-c(6) (“**MARTIN ACT**”), committed as follows:

The defendants Abacus Federal Savings Bank and Yiu Wah Wong, in the County of New York and elsewhere, on or about June 15, 2009, intentionally engaged in fraud, deception, concealment, suppression, false pretense and fictitious and pretended purchase and sale, and with intent to deceive and defraud, made material false representations and statements, while engaged in inducing and promoting the issuance, distribution, exchange, sale, negotiation and purchase within and from New York of a security, to wit, residential mortgage loans, and thereby wrongfully obtained property with a value in excess of \$250.00.

**Ditmars Street, Brooklyn, NY 11221**

ONE HUNDRED-NINETEENTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung

“Raymond” Tam, Wen Fang “Fanny” Wang and Victoria Tsui, of the crime of **GRAND LARCENY IN THE SECOND DEGREE**, in violation of Penal Law §155.40(1), committed as follows:

The defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam, Wen Fang “Fanny” Wang and Victoria Tsui, in the County of New York and elsewhere, from on or about February 25, 2009 to on or about July 1, 2009, stole property from Fannie Mae and the value of the property exceeded fifty thousand dollars.

ONE HUNDRED-TWENTIETH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam, Wen Fang “Fanny” Wang and Victoria Tsui, of the crime of **RESIDENTIAL MORTGAGE FRAUD IN THE SECOND DEGREE**, in violation of Penal Law §187.20, committed as follows:

The defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam, Wen Fang “Fanny” Wang and Victoria Tsui, in the County of New York and elsewhere, from on or about February 25, 2009 to on or about July 1, 2009, knowingly and with intent to defraud, presented, caused to be presented, and prepared with knowledge and belief that it would be used in soliciting an applicant for, applying for, underwriting and closing a residential mortgage loan, a written statement which contained materially false information concerning a fact material thereto and thereby received proceeds and any other funds in the aggregate in excess of fifty thousand dollars.

ONE HUNDRED-TWENTY-FIRST COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam, Wen Fang “Fanny” Wang and Victoria Tsui, of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law §175.10, committed as follows:

The defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam, Wen Fang “Fanny” Wang and Victoria Tsui, in the County of New York and elsewhere, from on or about February 25, 2009 to on or about July 1, 2009, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry into the business records of an enterprise, Abacus Federal Savings Bank, to wit, a Gift Letter from Shuan Guang Jiang in the amount of \$29,180.

ONE HUNDRED-TWENTY-SECOND COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam, Wen Fang “Fanny” Wang and Victoria Tsui, of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law §175.10, committed as follows:

The defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam, Wen Fang “Fanny” Wang and Victoria Tsui, in the County of New York and elsewhere, from on or about February 25, 2009 to on or about July 1, 2009, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry into the business records of an enterprise, Abacus Federal Savings Bank, to wit, a Gift Letter from Hua Guang Lin in the amount of \$9,000.

ONE HUNDRED-TWENTY-THIRD COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam, Wen Fang “Fanny” Wang and Victoria Tsui, of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law §175.10, committed as follows:

The defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam, Wen Fang “Fanny” Wang and Victoria Tsui, in the County of New York and elsewhere, from on or about February 25, 2009 to on or about July 1, 2009, with intent to defraud and to commit another crime and to aid and conceal the

commission thereof, made and caused to be made a false entry into the business records of an enterprise, Abacus Federal Savings Bank, to wit, a Gift Letter from Hua Guang Lin in the amount of \$24,069.

ONE HUNDRED-TWENTY-FOURTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank and Yiu Wah Wong, of the crime of a violation of General Business Law §352-c(6) (“**MARTIN ACT**”), committed as follows:

The defendants Abacus Federal Savings Bank and Yiu Wah Wong, in the County of New York and elsewhere, on or about July 1, 2009, intentionally engaged in fraud, deception, concealment, suppression, false pretense and fictitious and pretended purchase and sale, and with intent to deceive and defraud, made material false representations and statements, while engaged in inducing and promoting the issuance, distribution, exchange, sale, negotiation and purchase within and from New York of a security, to wit, residential mortgage loans, and thereby wrongfully obtained property with a value in excess of \$250.00.

**218th Street, Bayside, NY 11364**

ONE HUNDRED-TWENTY-FIFTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam and Ying Chuan “Shelley” Wang, of the crime of **GRAND LARCENY IN THE SECOND DEGREE**, in violation of Penal Law §155.40(1), committed as follows:

The defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam and Ying Chuan “Shelley” Wang, in the County of New York and elsewhere, from on or about May 4, 2009 to on or about June 15, 2009, stole property from Fannie Mae and the value of the property exceeded fifty thousand dollars.

ONE HUNDRED-TWENTY-SIXTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam and Ying Chuan “Shelley” Wang, of the crime of **RESIDENTIAL MORTGAGE FRAUD IN THE SECOND DEGREE**, in violation of Penal Law §187.20, committed as follows:

The defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam and Ying Chuan “Shelley” Wang, in the County of New York and elsewhere, from on or about May 4, 2009 to on or about June 15, 2009, knowingly and with intent to defraud, presented, caused to be presented, and prepared with knowledge and belief that it would be used in soliciting an applicant for, applying for, underwriting and closing a residential mortgage loan, a written statement which contained materially false information concerning a fact material thereto and thereby received proceeds and any other funds in the aggregate in excess of fifty thousand dollars.

ONE HUNDRED-TWENTY-SEVENTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam and Ying Chuan “Shelley” Wang, of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law §175.10, committed as follows:

The defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam and Ying Chuan “Shelley” Wang, in the County of New York and elsewhere, from on or about May 4, 2009 to on or about June 15, 2009, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry into the business records of an enterprise, Abacus Federal Savings Bank, to wit, a Verification of Employment for Fei Long Chen.

ONE HUNDRED-TWENTY-EIGHTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam and Ying Chuan “Shelley” Wang, of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law §175.10, committed as follows:

The defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam and Ying Chuan “Shelley” Wang, in the County of New York and elsewhere, from on or about May 4, 2009 to on or about June 15, 2009, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry into the business records of an enterprise, Abacus Federal Savings Bank, to wit, a Gift Letter from Yen Hsueh Chen in the amount of \$11,762.49.

ONE HUNDRED-TWENTY-NINTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam and Ying Chuan “Shelley” Wang, of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law §175.10, committed as follows:

The defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam and Ying Chuan “Shelley” Wang, in the County of New York and elsewhere, from on or about May 4, 2009 to on or about June 15, 2009, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry into the business records of an enterprise, Abacus Federal Savings Bank, to wit, a Gift Letter from Yuan Wen Zeng in the amount of \$83,000.

ONE HUNDRED-THIRTIETH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam and Ying Chuan “Shelley” Wang, of the crime of **FALSIFYING**

**BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law §175.10, committed as follows:

The defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam and Ying Chuan “Shelley” Wang, in the County of New York and elsewhere, from on or about May 4, 2009 to on or about June 15, 2009, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry into the business records of an enterprise, Abacus Federal Savings Bank, to wit, a Gift Letter from Jin Xue Cai in the amount of \$22,000.

ONE HUNDRED THIRTY-FIRST COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank and Yiu Wah Wong, of the crime of a violation of General Business Law §352-c(6) (“**MARTIN ACT**”), committed as follows:

The defendants Abacus Federal Savings Bank and Yiu Wah Wong, in the County of New York and elsewhere, on or about June 15, 2009, intentionally engaged in fraud, deception, concealment, suppression, false pretense and fictitious and pretended purchase and sale, and with intent to deceive and defraud, made material false representations and statements, while engaged in inducing and promoting the issuance, distribution, exchange, sale, negotiation and purchase within and from New York of a security, to wit, residential mortgage loans, and thereby wrongfully obtained property with a value in excess of \$250.00.

**53rd Road, Maspeth, NY 11378**

ONE HUNDRED-THIRTY-SECOND COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam, Wai Ching “Alice” Wong and Victoria Tsui, of the crime of **GRAND LARCENY IN THE SECOND DEGREE**, in violation of Penal Law §155.40(1), committed as follows:



The defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam, Wai Ching “Alice” Wong and Victoria Tsui, in the County of New York and elsewhere, from on or about March 11, 2009 to on or about June 15, 2009, stole property from Fannie Mae and the value of the property exceeded fifty thousand dollars.

ONE HUNDRED-THIRTY-THIRD COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam, Wai Ching “Alice” Wong and Victoria Tsui, of the crime of **RESIDENTIAL MORTGAGE FRAUD IN THE SECOND DEGREE**, in violation of Penal Law §187.20, committed as follows:

The defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam, Wai Ching “Alice” Wong and Victoria Tsui, in the County of New York and elsewhere, from on or about March 11, 2009 to on or about June 15, 2009, knowingly and with intent to defraud, presented, caused to be presented, and prepared with knowledge and belief that it would be used in soliciting an applicant for, applying for, underwriting and closing a residential mortgage loan, a written statement which contained materially false information concerning a fact material thereto and thereby received proceeds and any other funds in the aggregate in excess of fifty thousand dollars.

ONE HUNDRED-THIRTY-FOURTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam, Wai Ching “Alice” Wong and Victoria Tsui, of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law §175.10, committed as follows:

The defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam, Wai Ching “Alice” Wong and Victoria Tsui, in the County of New York and elsewhere, from on or about March 11, 2009 to on or about June 15, 2009, with intent to defraud and to commit another crime and to aid and conceal the

commission thereof, made and caused to be made a false entry into the business records of an enterprise, Abacus Federal Savings Bank, to wit, a Verification of Employment for Dong Lin.

ONE HUNDRED-THIRTY-FIFTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam, Wai Ching “Alice” Wong and Victoria Tsui, of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law §175.10, committed as follows:

The defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam, Wai Ching “Alice” Wong and Victoria Tsui, in the County of New York and elsewhere, from on or about March 11, 2009 to on or about June 15, 2009, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry into the business records of an enterprise, Abacus Federal Savings Bank, to wit, a Gift Letter from Man Li in the amount of \$23,000.

ONE HUNDRED-THIRTY-SIXTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam, Wai Ching “Alice” Wong and Victoria Tsui, of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law §175.10, committed as follows:

The defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam, Wai Ching “Alice” Wong and Victoria Tsui, in the County of New York and elsewhere, from on or about March 11, 2009 to on or about June 15, 2009, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry into the business records of an enterprise, Abacus Federal Savings Bank, to wit, a Gift Letter from Jian Ru Li in the amount of \$15,000.

ONE HUNDRED-THIRTY-SEVENTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam, Wai Ching “Alice” Wong and Victoria Tsui, of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law §175.10, committed as follows:

The defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam, Wai Ching “Alice” Wong and Victoria Tsui, in the County of New York and elsewhere, from on or about March 11, 2009 to on or about June 15, 2009, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry into the business records of an enterprise, Abacus Federal Savings Bank, to wit, a Gift Letter from Xiu M Zeng in the amount of \$30,000.

ONE HUNDRED-THIRTY-EIGHTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam, Wai Ching “Alice” Wong and Victoria Tsui, of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law §175.10, committed as follows:

The defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam, Wai Ching “Alice” Wong and Victoria Tsui, in the County of New York and elsewhere, from on or about March 11, 2009 to on or about June 15, 2009, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry into the business records of an enterprise, Abacus Federal Savings Bank, to wit, a Gift Letter from Wen H Wu in the amount of \$19,200.

ONE HUNDRED-THIRTY-NINTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam, Wai Ching “Alice” Wong and Victoria Tsui, of the crime of **FAL-**

**SIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law §175.10, committed as follows:

The defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam, Wai Ching “Alice” Wong and Victoria Tsui, in the County of New York and elsewhere, from on or about March 11, 2009 to on or about June 15, 2009, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry into the business records of an enterprise, Abacus Federal Savings Bank, to wit, a Gift Letter from Yu Chai Shi in the amount of \$24,000.

ONE HUNDRED-FORTIETH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam, Wai Ching “Alice” Wong and Victoria Tsui, of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law §175.10, committed as follows:

The defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam, Wai Ching “Alice” Wong and Victoria Tsui, in the County of New York and elsewhere, from on or about March 11, 2009 to on or about June 15, 2009, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry into the business records of an enterprise, Abacus Federal Savings Bank, to wit, a Gift Letter from Wei Lin in the amount of \$30,000.

ONE HUNDRED-FORTY-FIRST COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam, Wai Ching “Alice” Wong and Victoria Tsui, of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law §175.10, committed as follows:

The defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam, Wai Ching “Alice” Wong and Victoria Tsui, in the County of New

York and elsewhere, from on or about March 11, 2009 to on or about June 15, 2009, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry into the business records of an enterprise, Abacus Federal Savings Bank, to wit, a Gift Letter from Zhu Bing Li in the amount of \$25,000.

ONE HUNDRED-FORTY-SECOND COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam, Wai Ching “Alice” Wong and Victoria Tsui, of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law §175.10, committed as follows:

The defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam, Wai Ching “Alice” Wong and Victoria Tsui, in the County of New York and elsewhere, from on or about March 11, 2009 to on or about June 15, 2009, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry into the business records of an enterprise, Abacus Federal Savings Bank, to wit, a Gift Letter from Shi Qiu Ya in the amount of \$53,960.

ONE HUNDRED-FORTY-THIRD COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank and Yiu Wah Wong, of the crime of a violation of General Business Law §352-c(6) (“**MARTIN ACT**”), committed as follows:

The defendants Abacus Federal Savings Bank and Yiu Wah Wong, in the County of New York and elsewhere, on or about June 15, 2009, intentionally engaged in fraud, deception, concealment, suppression, false pretense and fictitious and pretended purchase and sale, and with intent to deceive and defraud, made material false representations and statements, while engaged in inducing and promoting the issuance, distribution, exchange, sale, negotiation and purchase within and from New

York of a security, to wit, residential mortgage loans, and thereby wrongfully obtained property with a value in excess of \$250.00.

**51st Road, Woodside, NY 11377**

ONE HUNDRED-FORTY-FOURTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam, Wen Fang “Fanny” Wang and Victoria Tsui, of the crime of **GRAND LARCENY IN THE SECOND DEGREE**, in violation of Penal Law §155.40(1), committed as follows:

The defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam, Wen Fang “Fanny” Wang and Victoria Tsui, in the County of New York and elsewhere, from on or about February 18, 2009 to on or about June 19, 2009, stole property from Fannie Mae and the value of the property exceeded fifty thousand dollars.

ONE HUNDRED-FORTY-FIFTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam, Wen Fang “Fanny” Wang and Victoria Tsui, of the crime of **RESIDENTIAL MORTGAGE FRAUD IN THE SECOND DEGREE**, in violation of Penal Law §187.20, committed as follows:

The defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam, Wen Fang “Fanny” Wang and Victoria Tsui, in the County of New York and elsewhere, from on or about February 18, 2009 to on or about June 19, 2009, knowingly and with intent to defraud, presented, caused to be presented, and prepared with knowledge and belief that it would be used in soliciting an applicant for, applying for, underwriting and closing a residential mortgage loan, a written statement which contained materially false information concerning a fact material thereto and thereby received proceeds and any other funds in the aggregate in excess of fifty thousand dollars.

ONE HUNDRED-FORTY-SIXTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam, Wen Fang “Fanny” Wang and Victoria Tsui, of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law §175.10, committed as follows:

The defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam, Wen Fang “Fanny” Wang and Victoria Tsui, in the County of New York and elsewhere, from on or about February 18, 2009 to on or about June 19, 2009, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry into the business records of an enterprise, Abacus Federal Savings Bank, to wit, a Verification of Employment for Guo Ying Li.

ONE HUNDRED-FORTY-SEVENTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam, Wen Fang “Fanny” Wang and Victoria Tsui, of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law §175.10, committed as follows:

The defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam, Wen Fang “Fanny” Wang and Victoria Tsui, in the County of New York and elsewhere, from on or about February 18, 2009 to on or about June 19, 2009, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry into the business records of an enterprise, Abacus Federal Savings Bank, to wit, a Gift Letter from Cheng Ying in the amount of \$9,989.

ONE HUNDRED-FORTY-EIGHTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam, Wen Fang “Fanny” Wang and Victoria Tsui, of the crime of

**FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law §175.10, committed as follows:

The defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam, Wen Fang “Fanny” Wang and Victoria Tsui, in the County of New York and elsewhere, from on or about February 18, 2009 to on or about June 19, 2009, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry into the business records of an enterprise, Abacus Federal Savings Bank, to wit, a Gift Letter from Ling Far Wong in the amount of \$33,000.

ONE HUNDRED-FORTY-NINTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank and Yiu Wah Wong, of the crime of a violation of General Business Law §352-c(6) (“**MARTIN ACT**”), committed as follows:

The defendants Abacus Federal Savings Bank and Yiu Wah Wong, in the County of New York and elsewhere, on or about June 19, 2009, intentionally engaged in fraud, deception, concealment, suppression, false pretense and fictitious and pretended purchase and sale, and with intent to deceive and defraud, made material false representations and statements, while engaged in inducing and promoting the issuance, distribution, exchange, sale, negotiation and purchase within and from New York of a security, to wit, residential mortgage loans, and thereby wrongfully obtained property with a value in excess of \$250.00.

**72nd Street, Woodside, NY 11377**

ONE HUNDRED-FIFTIETH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam, Wen Fang “Fanny” Wang and Yi Yi Zhao, of the crime of **GRAND LARCENY IN THE SECOND DEGREE**, in violation of Penal Law §155.40(1), committed as follows:



The defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam, Wen Fang “Fanny” Wang and Yi Yi Zhao, in the County of New York and elsewhere, from on or about October 21, 2008 to on or about June 30, 2009, stole property from Fannie Mae and the value of the property exceeded fifty thousand dollars.

ONE HUNDRED-FIFTY-FIRST COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam, Wen Fang “Fanny” Wang and Yi Yi Zhao, of the crime of **RESIDENTIAL MORTGAGE FRAUD IN THE SECOND DEGREE**, in violation of Penal Law §187.20, committed as follows:

The defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam, Wen Fang “Fanny” Wang and Yi Yi Zhao, in the County of New York and elsewhere, from on or about November 1, 2008 to on or about June 30, 2009, knowingly and with intent to defraud, presented, caused to be presented, and prepared with knowledge and belief that it would be used in soliciting an applicant for, applying for, underwriting and closing a residential mortgage loan, a written statement which contained materially false information concerning a fact material thereto and thereby received proceeds and any other funds in the aggregate in excess of fifty thousand dollars.

ONE HUNDRED-FIFTY-SECOND COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam, Wen Fang “Fanny” Wang and Yi Yi Zhao, of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law §175.10, committed as follows:

The defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam, Wen Fang “Fanny” Wang and Yi Yi Zhao, in the County of New York and elsewhere, from on or about October 21, 2008 to on or about June 30, 2009, with intent to defraud and to commit another crime and to aid and conceal the

commission thereof, made and caused to be made a false entry into the business records of an enterprise, Abacus Federal Savings Bank, to wit, a Verification of Employment for Feng Jiao Yang.

ONE HUNDRED-FIFTY-THIRD COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank and Yiu Wah Wong, of the crime of a violation of General Business Law §352-c(6) (“**MARTIN ACT**”), committed as follows:

The defendants Abacus Federal Savings Bank and Yiu Wah Wong, in the County of New York and elsewhere, on or about June 30, 2009, intentionally engaged in fraud, deception, concealment, suppression, false pretense and fictitious and pretended purchase and sale, and with intent to deceive and defraud, made material false representations and statements, while engaged in inducing and promoting the issuance, distribution, exchange, sale, negotiation and purchase within and from New York of a security, to wit, residential mortgage loans, and thereby wrongfully obtained property with a value in excess of \$250.00.

**125th St., College Point, NY 11356**

ONE HUNDRED-FIFTY-FOURTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam and Yi Yi Zhao, of the crime of **GRAND LARCENY IN THE SECOND DEGREE**, in violation of Penal Law §155.40(1), committed as follows:

The defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam and Yi Yi Zhao, in the County of New York and elsewhere, from on or about April 10, 2009 to on or about July 13, 2009, stole property from Fannie Mae and the value of the property exceeded fifty thousand dollars.

ONE HUNDRED-FIFTY-FIFTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung

“Raymond” Tam and Yi Yi Zhao, of the crime of **RESIDENTIAL MORTGAGE FRAUD IN THE SECOND DEGREE**, in violation of Penal Law §187.20, committed as follows:

The defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam and Yi Yi Zhao, in the County of New York and elsewhere, from on or about April 10, 2009 to on or about July 13, 2009, knowingly and with intent to defraud, presented, caused to be presented, and prepared with knowledge and belief that it would be used in soliciting an applicant for, applying for, underwriting and closing a residential mortgage loan, a written statement which contained materially false information concerning a fact material thereto and thereby received proceeds and any other funds in the aggregate in excess of fifty thousand dollars.

ONE HUNDRED-FIFTY-SIXTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam and Yi Yi Zhao, of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law §175.10, committed as follows:

The defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam and Yi Yi Zhao, in the County of New York and elsewhere, from on or about April 10, 2009 to on or about July 13, 2009, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry into the business records of an enterprise, Abacus Federal Savings Bank, to wit, a Verification of Employment for Ding Rong Xu.

ONE HUNDRED-FIFTY-SEVENTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam and Yi Yi Zhao, of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law §175.10, committed as follows:

The defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam and Yi Yi Zhao, in the County of New York and elsewhere, from on or about April 10, 2009 to on or about July 13, 2009, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry into the business records of an enterprise, Abacus Federal Savings Bank, to wit, a Gift Letter from Ding Yong Xu in the amount of \$42,050.

ONE HUNDRED-FIFTY-EIGHTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank and Yiu Wah Wong, of the crime of a violation of General Business Law §352-c(6) (“**MARTIN ACT**”), committed as follows:

The defendants Abacus Federal Savings Bank and Yiu Wah Wong, in the County of New York and elsewhere, on or about July 13, 2009, intentionally engaged in fraud, deception, concealment, suppression, false pretense and fictitious and pretended purchase and sale, and with intent to deceive and defraud, made material false representations and statements, while engaged in inducing and promoting the issuance, distribution, exchange, sale, negotiation and purchase within and from New York of a security, to wit, residential mortgage loans, and thereby wrongfully obtained property with a value in excess of \$250.00.

**20th Ave, College Point, NY 11356**

ONE HUNDRED-FIFTY-NINTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam and Victoria Tsui, of the crime of **GRAND LARCENY IN THE SECOND DEGREE**, in violation of Penal Law §155.40(1), committed as follows:

The defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam and Victoria Tsui, in the County of New York and elsewhere, from on or about March 16, 2009 to on or about December 15, 2009, stole property from Fannie Mae and the value of the property exceeded fifty thousand dollars.

ONE HUNDRED-SIXTIETH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam and Victoria Tsui, of the crime of **RESIDENTIAL MORTGAGE FRAUD IN THE SECOND DEGREE**, in violation of Penal Law §187.20, committed as follows:

The defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam and Victoria Tsui, in the County of New York and elsewhere, from on or about March 16, 2009 to on or about December 15, 2009, knowingly and with intent to defraud, presented, caused to be presented, and prepared with knowledge and belief that it would be used in soliciting an applicant for, applying for, underwriting and closing a residential mortgage loan, a written statement which contained materially false information concerning a fact material thereto and thereby received proceeds and any other funds in the aggregate in excess of fifty thousand dollars.

ONE HUNDRED-SIXTY-FIRST COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam and Victoria Tsui, of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law §175.10, committed as follows:

The defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam and Victoria Tsui, in the County of New York and elsewhere, from on or about March 16, 2009 to on or about December 15, 2009, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry into the business records of an enterprise, Abacus Federal Savings Bank, to wit, a Verification of Employment for Jian Yan Zheng.

ONE HUNDRED-SIXTY-SECOND COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung

“Raymond” Tam and Victoria Tsui, of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law §175.10, committed as follows:

The defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam and Victoria Tsui, in the County of New York and elsewhere, from on or about March 16, 2009 to on or about December 15, 2009, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry into the business records of an enterprise, Abacus Federal Savings Bank, to wit, a Gift Letter from Liang Wu in the amount of \$60,500.

ONE HUNDRED-SIXTY-THIRD COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam and Victoria Tsui, of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law §175.10, committed as follows:

The defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam and Victoria Tsui, in the County of New York and elsewhere, from on or about March 16, 2009 to on or about December 15, 2009, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry into the business records of an enterprise, Abacus Federal Savings Bank, to wit, a Gift Letter from Qing Yao in the amount of \$20,000.

ONE HUNDRED-SIXTY-FOURTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank and Yiu Wah Wong, of the crime of a violation of General Business Law §352-c(6) (“**MARTIN ACT**”), committed as follows:

The defendants Abacus Federal Savings Bank and Yiu Wah Wong, in the County of New York and elsewhere, on or about December 15, 2009, intentionally engaged in fraud, deception, concealment, suppression, false pretense and fictitious and pretended purchase and sale, and with intent to deceive and defraud, made material false representations and statements, while engaged in inducing and promoting the issuance, distribution, exchange, sale, negotiation and purchase within and from New York of a security, to wit, residential mortgage loans, and thereby wrongfully obtained property with a value in excess of \$250.00.

**78th Street, Brooklyn, NY 11228**

ONE HUNDRED-SIXTY-FIFTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam and Wai Ching “Alice” Wong, of the crime of **ATTEMPTED GRAND LARCENY IN THE SECOND DEGREE**, in violation of Penal Law §110/155.40(1), committed as follows:

The defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam and Wai Ching “Alice” Wong, in the County of New York and elsewhere, from on or about October 20, 2009 to on or about December 11, 2009, attempted to steal property from Fannie Mae and the value of the property exceeded fifty thousand dollars.

ONE HUNDRED-SIXTY-SIXTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam and Wai Ching “Alice” Wong, of the crime of **ATTEMPTED RESIDENTIAL MORTGAGE FRAUD IN THE SECOND DEGREE**, in violation of Penal Law §110/187.20, committed as follows:

The defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam and Wai Ching “Alice” Wong, in the County of New York and elsewhere, from on or about October 20, 2009 to on or about December 11, 2009, knowingly and with intent to defraud, attempted to present, cause to be presented,

and prepare with knowledge and belief that it would be used in soliciting an applicant for, applying for, underwriting and closing a residential mortgage loan, a written statement which contained materially false information concerning a fact material thereto and thereby received proceeds and any other funds in the aggregate in excess of fifty thousand dollars.

ONE HUNDRED-SIXTY-SEVENTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam and Wai Ching “Alice” Wong, of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law §175.10, committed as follows:

The defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam and Wai Ching “Alice” Wong, in the County of New York and elsewhere, from on or about October 20, 2009 to on or about December 11, 2009, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry into the business records of an enterprise, Abacus Federal Savings Bank, to wit, a Verification of Employment for Qin Xiao Chen.

ONE HUNDRED-SIXTY-EIGHTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam and Wai Ching “Alice” Wong, of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law §175.10, committed as follows:

The defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam and Wai Ching “Alice” Wong, in the County of New York and elsewhere, from on or about October 20, 2009 to on or about December 11, 2009, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry into the business



records of an enterprise, Abacus Federal Savings Bank, to wit, a Gift Letter from Yu Ling Chi in the amount of \$228,065.

**Bexley Lane, Piscataway, NJ 08854**

ONE HUNDRED-SIXTY-NINTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam and Victoria Tsui, of the crime of **GRAND LARCENY IN THE SECOND DEGREE**, in violation of Penal Law §155.40(1), committed as follows:

The defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam and Victoria Tsui, in the County of New York and elsewhere, from on or about November 19, 2009 to on or about February 3, 2010, stole property from Fannie Mae and the value of the property exceeded fifty thousand dollars.

ONE HUNDRED SEVENTIETH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam and Victoria Tsui, of the crime of **RESIDENTIAL MORTGAGE FRAUD IN THE SECOND DEGREE**, in violation of Penal Law §187.20, committed as follows:

The defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam and Victoria Tsui, in the County of New York and elsewhere, from on or about November 19, 2009 to on or about February 3, 2010, knowingly and with intent to defraud, presented, caused to be presented, and prepared with knowledge and belief that it would be used in soliciting an applicant for, applying for, underwriting and closing a residential mortgage loan, a written statement which contained materially false information concerning a fact material thereto and thereby received proceeds and any other funds in the aggregate in excess of fifty thousand dollars.

ONE HUNDRED SEVENTY-FIRST COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam and Victoria Tsui, of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law §175.10, committed as follows:

The defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam and Victoria Tsui, in the County of New York and elsewhere, from on or about November 19, 2009 to on or about February 3, 2010, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry into the business records of an enterprise, Abacus Federal Savings Bank, to wit, a Verification of Employment for Jian Hou.

ONE HUNDRED SEVENTY-SECOND COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam and Victoria Tsui, of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law §175.10, committed as follows:

The defendants Abacus Federal Savings Bank, Yiu Wah Wong, Wai Hung “Raymond” Tam and Victoria Tsui, in the County of New York and elsewhere, from on or about November 19, 2009 to on or about February 3, 2010, with intent to defraud and to commit another crime and to aid and conceal the commission thereof, made and caused to be made a false entry into the business records of an enterprise, Abacus Federal Savings Bank, to wit, a Gift Letter from Na Zhang in the amount of \$23,500.

ONE HUNDRED-SEVENTY-THIRD COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank and Yiu Wah Wong, of the crime of a violation of General Business Law §352-c(6) (“**MARTIN ACT**”), committed as follows:

The defendants Abacus Federal Savings Bank and Yiu Wah Wong, in the County of New York and elsewhere, on or about February 3, 2010, intentionally engaged in fraud, deception, concealment, suppression, false pretense and fictitious and pretended purchase and sale, and with intent to deceive and defraud, made material false representations and statements, while engaged in inducing and promoting the issuance, distribution, exchange, sale, negotiation and purchase within and from New York of a security, to wit, residential mortgage loans, and thereby wrongfully obtained property with a value in excess of \$250.00.

### **AGGREGATED CHARGES**

ONE HUNDRED SEVENTY-FOURTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank, Yiu Wah Wong and Wai Hung “Raymond” Tam, of the crime of **GRAND LARCENY IN THE FIRST DEGREE**, in violation of Penal Law §155.42, committed as follows:

The defendants Abacus Federal Savings Bank, Yiu Wah Wong and Wai Hung “Raymond” Tam, in the County of New York and elsewhere, from on or about May 11, 2005 to on or about February 3, 2010, stole property from Fannie Mae and the value of the property exceeded one million dollars.

ONE HUNDRED-SEVENTY-FIFTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendant Wen Fang “Fanny” Wang, of the crime of **GRAND LARCENY IN THE FIRST DEGREE**, in violation of Penal Law §155.42, committed as follows:

The defendant Wen Fang “Fanny” Wang, in the County of New York and elsewhere, from on or about March 16, 2007 to on or about July 1, 2009, stole property from Fannie Mae and the value of the property exceeded one million dollars.

ONE HUNDRED-SEVENTY-SIXTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendant Yuk Yin “Loretta” Lam Cheng, of the crime of **GRAND LARCENY IN THE FIRST DEGREE**, in violation of Penal Law §155.42, committed as follows:

The defendant Yuk Yin “Loretta” Lam Cheng, in the County of New York and elsewhere, from on or about July 18, 2006 to on or about February 20, 2008, stole property from Fannie Mae and the value of the property exceeded one million dollars.

ONE HUNDRED-SEVENTY-SEVENTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendant Victoria Tsui, of the crime of **GRAND LARCENY IN THE FIRST DEGREE**, in violation of Penal Law §155.42, committed as follows:

The defendant Victoria Tsui, in the County of New York and elsewhere, from on or about October 17, 2006 to on or about February 3, 2010, stole property from Fannie Mae and the value of the property exceeded one million dollars.

ONE HUNDRED-SEVENTY-EIGHTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendant Wai Ching “Alice” Wong, of the crime of **GRAND LARCENY IN THE FIRST DEGREE**, in violation of Penal Law §155.42, committed as follows:

The defendant Wai Ching “Alice” Wong, in the County of New York and elsewhere, from on or about October 17, 2006 to on or about June 15, 2009, stole property from Fannie Mae and the value of the property exceeded one million dollars.

ONE HUNDRED-SEVENTY-NINTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendant Yi Yi Zhao, of the crime of **GRAND LARCENY IN THE FIRST DEGREE**, in violation of Penal Law §155.42, committed as follows:

The defendant Yi Yi Zhao, in the County of New York and elsewhere, from on or about March 16, 2007 to on or about July 13, 2009, stole property from Fannie Mae and the value of the property exceeded one million dollars.

ONE HUNDRED-EIGHTIETH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants Abacus Federal Savings Bank, Yiu Wah Wong and Wai Hung “Raymond” Tam, of the crime of **RESIDENTIAL MORTGAGE FRAUD IN THE FIRST DEGREE**, in violation of Penal Law §187.25, committed as follows:

The defendants Abacus Federal Savings Bank, Yiu Wah Wong and Wai Hung “Raymond” Tam, in the County of New York and elsewhere, from on or about November 1, 2008 to on or about February 3, 2010, knowingly and with intent to defraud, presented, caused to be presented, and prepared with knowledge and belief that it would be used in soliciting an applicant for, applying for, underwriting and closing a residential mortgage loan, a written statement which contained materially false information concerning a fact material thereto and thereby received proceeds and any other funds in the aggregate in excess of one million dollars.

ONE HUNDRED-EIGHTY-FIRST COUNT:

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

The defendant Victoria Tsui, in the County of New York and elsewhere, from on or about February 11, 2009 to on or about February 3, 2010, knowingly and with intent to defraud, presented, caused to be presented, and prepared with knowledge and belief that it would be used in soliciting an applicant for, applying for, underwriting and closing a residential mortgage loan, a written statement which contained materially false information concerning a fact material thereto and thereby received proceeds and any other funds in the aggregate in excess of one million dollars.

ONE HUNDRED-EIGHTY-SECOND COUNT:

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

The defendant Wen Fang “Fanny” Wang, in the County of New York and elsewhere, from on or about November 1, 2008 to on or about July 1, 2009, knowingly and with intent to defraud, presented, caused to be presented, and prepared with knowledge and belief that it would be used in soliciting an applicant for, applying for, underwriting and closing a residential mortgage loan, a written statement which contained materially false information concerning a fact material thereto and thereby received proceeds and any other funds in the aggregate in excess of one million dollars.

ONE HUNDRED-EIGHTY-THIRD COUNT:

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

The defendant Wai Ching “Alice” Wong, in the County of New York and elsewhere, from on or about November 1, 2008 to on or about June 15, 2009, knowingly and with intent to defraud, presented, caused to be presented, and prepared with knowledge and belief that it would be used in soliciting an applicant for, applying for, underwriting and closing a residential mortgage loan, a written statement which contained materially false information concerning a fact material thereto and thereby received proceeds and any other funds in the aggregate in excess of one million dollars.

ONE HUNDRED-EIGHTY-FOURTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendant Yi Yi Zhao, of the crime of **RESIDENTIAL MORTGAGE**

**FRAUD IN THE FIRST DEGREE**, in violation of Penal Law §187.25, committed as follows:

The defendant Yi Yi Zhao, in the County of New York and elsewhere, from on or about November 1, 2008 to on or about July 13, 2009, knowingly and with intent to defraud, presented, caused to be presented, and prepared with knowledge and belief that it would be used in soliciting an applicant for, applying for, underwriting and closing a residential mortgage loan, a written statement which contained materially false information concerning a fact material thereto and thereby received proceeds and any other funds in the aggregate in excess of one million dollars.

**CYRUS R. VANCE, JR.**

District Attorney

Filed:

No. 2480/2012

NA

THE PEOPLE OF THE STATE OF NEW YORK

-against-

ABACUS FEDERAL SAVINGS BANK,  
YIU WAH WONG,  
WAI HUNG "RAYMOND" TAM,  
WEN FANG "FANNY" WANG,  
YUK YIN "LORETTA" LAM CHENG,  
CHI FUNG "DANNY" LAU,  
PHOEBE LEE,  
JIE QIONG "MICHELLE" NAN,  
VICTORIA TSUI,  
YING CHUAN "SHELLEY" WANG,  
WAI CHING "ALICE" WONG, and  
YI YI ZHAO,

Defendants.

INDICTMENT

CONSPIRACY IN THE FOURTH DEGREE, P.L. §105.10(1) (all defendants)

SCHEME TO DEFRAUD IN THE FIRST DEGREE, P.L. §190.65(1)(b) (defendant Abacus Federal Savings Bank; defendant Yiu Wah Wong)

VIOLATION OF G.B.L. §352-C(5) (defendant Abacus Federal Savings Bank; defendant Yiu Wah Wong)

VIOLATION OF G.B.L. §352-c(6) (defendant Abacus Federal Savings Bank, 27 cts.; defendant Yiu Wah Wong, 27 cts.)

GRAND LARCENY IN THE FIRST DEGREE, P.L. §155.42 (defendant Abacus Federal Savings Bank, 01 ct.; defendant Yiu Wah Wong, 01 ct.; defendant Wai Hung "Raymond" Tam, 01 ct.; Defendant Wen Fan "Fanny" Wang, 01 ct.; defendant Yuk Yin "Loretta" Lam Cheng, 01 ct.; defendant Victoria Tsui, 01 ct.; defendant Wai Ching "Alice" Wong, 01 ct.; defendant Yi Yi Zhao, 01 ct.)

GRAND LARCENY IN THE SECOND DEGREE, P.L. §155.40(1) (defendant Abacus Federal Savings Bank, 27 cts.; defendant Yiu Wah Wong, 27 cts.; defendant Wai Hung "Raymond" Tam, 27 cts.; defendant Wen Fang "Fanny Wang, 09 cts.; defendant Yuk Yin "Loretta" Lam Cheng, 05 cts.; defendant Jie Qiong "Michelle" Nan, 01 ct.; defendant Victoria Tsui, 07 cts.; defendant Ying Chuan "Shelley" Wang, 02 cts.; defendant Wai Ching "Alice" Wong, 10 cts.; defendant Yi Yi Zhao, 06 cts.)

FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE, P.L. §175.10 (defendant Abacus Federal Savings Bank, 100 cts.; defendant Yiu Wah Wong, 100 cts.; defendant Wai Hung "Raymond" Tam, 100 cts.; defendant Wen Fang "Fanny Wang, 36 cts.; defendant Yuk Yin "Loretta" Lam Cheng, 12 cts.; defendant Jie Qiong "Michelle" Nan, 03 cts.; defendant Victoria Tsui, 30 cts.; defendant Ying Chuan "Shelley" Wang, 06 cts.; defendant Wai Ching "Alice" Wong, 44 cts.; defendant Yi Yi Zhao, 19 cts.)

ATTEMPTED GRAND LARCENY IN THE SECOND DEGREE, P.L. §110/155.40(1) (defendant Abacus Federal Savings Bank, 01 ct.; defendant Yiu Wah Wong, 01 ct.; defendant Wai Hung "Raymond" Tam, 01 ct.; defendant Wai Ching "Alice" Wong, 01 ct.)

RESIDENTIAL MORTGAGE FRAUD IN THE FIRST DEGREE, P.L. §187.25 (defendant Abacus Federal Savings Bank, 01 ct.; defendant Yiu Wah Wong, 01 ct.; defendant Wai Hung "Raymond" Tam, 01 ct.; defendant Wen Fang "Fanny" Wang, 01 ct.; defendant Victoria Tsui, 01 ct.; defendant Wai Ching "Alice" Wong, 01 ct.; defendant Yi Yi Zhao, 01 ct.)

RESIDENTIAL MORTGAGE FRAUD IN THE SECOND DEGREE, P.L. §187.20 (defendant Abacus Federal Savings Bank, 14 cts.; defendant Yiu Wah Wong, 14 cts.; defendant Wai Hung "Raymond" Tam, 14 cts.; defendant Wen Fang "Fanny" Wang, 05 cts.; defendant Victoria Tsui, 06 cts.; defendant Ying Chuan "Shelley" Wang, 02 cts.; defendant Wai Ching "Alice" Wong, 03 cts.; defendant Yi Yi Zhao 03 cts.)

ATTEMPTED RESIDENTIAL MORTGAGE FRAUD IN THE SECOND DEGREE, P.L. §110/187.20 (defendant Abacus Federal Savings Bank, 01 ct.; defendant Yiu Wah Wong, 01 ct.; defendant Wai Hung "Raymond" Tam, 01 ct.; defendant Wai Ching "Alice" Wong, 01 ct.)

CYRUS R. VANCE, JR.  
District Attorney

Foreperson

ADA Edward Starishevsky  
ADA Julieta V. Lozano

Major Economic Crimes Bureau

A True Bill