

UNITED STATES DISTRICT COURT  
DISTRICT OF CONNECTICUT

UNITED STATES OF AMERICA,

Plaintiff,

v.

Civil No.

51 PARCELS OF PROPERTY LOCATED  
IN NEW HAVEN, CONNECTICUT,  
AT THE FOLLOWING ADDRESSES:

- (1) 197-199 BASSETT STREET
- (2) 25-29 BATTER TERRACE
- (3) 81-83 BEERS STREET
- (4) 501 BLATCHLEY AVENUE
- (5) 136 CARLISLE STREET
- (6) 561 CENTRAL AVENUE
- (7) 115 CLAY STREET
- (8) 15 COLBY COURT
- (9) 141 COUNTY STREET
- (10) 270 DAVENPORT AVENUE
- (11) 280 DAVENPORT AVENUE
- (12) 108 DEWITT STREET
- (13) 205-207 DOVER STREET
- (14) 161 EDGEWOOD AVENUE
- (15) 357 ELLSWORTH AVENUE
- (16) 363 ELLSWORTH AVENUE
- (17) 212-214 ENGLISH STREET
- (18) 286 EXCHANGE STREET
- (19) 299 GREENWICH AVENUE
- (20) 222 HALLOCK AVENUE
- (21) 89 HAZEL STREET
- (22) 314 HOWARD AVENUE
- (23) 490 HOWARD AVENUE
- (24) 456 HUNTINGTON STREET
- (25) 88-89 HURLBURT STREET
- (26) 186 JAMES STREET
- (27) 265 JAMES STREET
- (28) 382 LOMBARD STREET
- (29) 19-21 NORTON STREET
- (30) 279-281 NORTON STREET
- (31) 353 ORCHARD STREET
- (32) 378-380 ORCHARD STREET

May 18, 2010

(33) 95 PARDEE STREET :  
(34) 122-124 PLYMOUTH STREET :  
(35) 97-99 ROCK CREEK ROAD :  
(36) 41 SHEFFIELD AVENUE :  
(37) 8 SHELTER STREET :  
(38) 37-39 SHELTER STREET :  
(39) 140 SHELTON AVENUE :  
(40) 418 SHELTON AVENUE :  
(41) 334-336 SHERMAN AVENUE :  
(42) 342 SHERMAN AVENUE :  
(43) 55-57 THOMPSON STREET :  
(44) 443 VALLEY STREET :  
(45) 56-58 VICTORY DRIVE :  
(46) 159 WEST STREET :  
(47) 579-581 WHALLEY AVENUE :  
(48) 583-585 WINCHESTER AVENUE :  
(49) 872-874 WINCHESTER AVENUE :  
(50) 510 WINTHROP AVENUE :  
(51) 573 WINTHROP AVENUE :

WITH ALL APPURTENANCES AND :  
IMPROVEMENTS THEREON, :

Defendants. :

[CLAIMANTS: MENACHEM LEVITIN, :  
161 EDGEWOOD, LLC, ADM :  
HOLDINGS, LLC, BATIA, LLC, :  
BEIT AVIV, LLC, BEIT AVIV II, LLC, :  
L & I INVESTMENTS, LLC, :  
MOSHE, LLC, NEW HAVEN :  
INVESTMENT GROUP, LLC, :  
PARNOSA, LLC, SHEMESH, LLC, :  
SOLO INVESTMENTS, LLC, VIK :  
HOLDINGS, LLC., WHITE OAK :  
NEW HAVEN, LLC, WASHINGTON :  
MUTUAL BANK, FLAGSTAFF :  
BANK AND CITIMORTGAGE, INC.] :

**VERIFIED COMPLAINT OF FORFEITURE**

Plaintiff, United States of America, by its attorneys, David B. Fein, United States

Attorney for the District of Connecticut, and Julie G. Turbert, Assistant United States Attorney,

brings this complaint and alleges as follows in accordance with Supplemental Rule G(2) of the Federal Rules of Civil Procedure:

**NATURE OF ACTION**

1. This is a civil action in rem brought to enforce the provision of Title 18, United States Code, Section 981(a)(1)(A) for the forfeiture of property involved in a financial transaction in violation of Title 18, United States Code, Sections 1956 or 1957, or to enforce the provision of Title 18, United States Code, Section 981(a)(1)(C) for the forfeiture of property which constitutes or is derived from proceeds traceable to an offense constituting “specified unlawful activity” (as defined in 18 U.S.C. § 1956(c)(7)), namely wire fraud in violation of 18 U.S.C. § 1343, or conspiracy to commit such offense.

**THE DEFENDANTS IN REM**

2. The real property defendants are 51 parcels of property located in New Haven, Connecticut at the following addresses: (1) 97-199 Bassett Street, (2) 25-29 Batter Terrace, (3) 81-83 Beers Street, (4) 501 Blatchley Avenue, (5) 136 Carlisle Street, (6) 561 Central Avenue, (7) 115 Clay Street, (8) 15 Colby Court, (9) 141 County Street, (10) 270 Davenport Avenue, (11) 280 Davenport Avenue, (12) 108 Dewitt Street, (13) 205-207 Dover Street, (14) 161 Edgewood Avenue, (15) 357 Ellsworth Avenue, (16) 363 Ellsworth Avenue, (17) 212-214 English Street, (18) 286 Exchange Street, (19) 299 Greenwich Avenue, (20) 222 Hallock Avenue, (21) 89 Hazel Street, (22) 31 Howard Avenue, (23) 490 Howard Avenue, (24) 456 Huntington Street, (25) 88-89 Hurlburt Street, (26) 186 James Street, (27) 265 James Street, (28) 382 Lombard Street, (29) 19-21 Norton Street, (30) 279-281 Norton Street, (31) 353 Orchard Street, (32) 378-380 Orchard Street, (33) 95 Pardee Street, (34) 122-124 Plymouth Street, (35) 97-99 Rock Creek Road, (36)

41 Sheffield Avenue, (37) 8 Shelter Street, (38) 37-39 Shelter Street, (39) 140 Shelton Avenue, (40) 418 Shelton Avenue, (41) 334-336 Sherman Avenue, (42) 342 Sherman Avenue, (43) 55-57 Thompson Street, (44) 443 Valley Street, (45) 56-58 Victory Drive, (46) 159 West Street, (47) 579-581 Whalley Avenue, (48) 583-585 Winchester Avenue, (49) 872-874 Winchester Avenue, (50) 510 Winthrop Avenue, and (51) 573 Winthrop Avenue, with all appurtenances and improvements thereon (real property defendants), more particularly described in Attachment A, which is attached hereto and incorporated herein by reference.

3. The record owners of the real property defendants are Menachem Levitin, 161 Edgewood, LLC, ADM Holdings, LLC, Batia, LLC, Beit Aviv, LLC, Beit Aviv II, LLC, L & I Investments, LLC, Moshe, LLC, New Haven Investment Group, LLC, Parnosa, LLC, Shemesh, LLC, Solo Investments, LLC, VIK Holdings, LLC., and White Oak New Haven, LLC. All of the real property defendants are non-owner occupied residential properties.

4. The real property defendants have not been seized but are located within this district and within the jurisdiction of the Court. The United States does not request authority from the Court to seize the real property defendants at this time. The United States will, as provided by 18 U.S.C. § 985(b)(1) and (c)(1):

- a. post notice of this action and a copy of the Complaint on the real property defendants, and
- b. serve notice of this action on the real property defendants' owner(s), and any other person or entity who may claim an interest in the real property defendants, along with a copy of this Complaint, and

- c. execute writs of entry for purposes of conducting an inspection and inventory of each property, and
- d. file a lis pendens in New Haven Land Records of the real property defendants' status as defendants in this in rem action.

5. The United States will also, as provided in 19 U.S.C. § 1606, appraise the real property defendants when it executes the Writs of Entry.

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**JURISDICTION AND VENUE**

4. Plaintiff brings this action *in rem* in its own right to forfeit and condemn the real property defendants. This Court has jurisdiction over an action commenced by the United States pursuant to 28 U.S.C. § 1345, and over an action for forfeiture pursuant to 28 U.S.C. § 1355(a).

5. This Court has *in rem* jurisdiction over the real property defendants pursuant to 28 U.S.C. 1355(b).

6. Venue is proper in this district pursuant to 28 U.S.C. §1355(b)(1), because the acts or omissions giving rise to the forfeiture occurred in this district, and pursuant to 28 U.S.C. § 1395, because the property is located in this district.

**BASIS FOR FORFEITURE**

7. The real property defendants are subject to forfeiture pursuant to 18 U.S.C. § 981(a)(1)(A) because they constitute property involved in a financial transaction in violation of Title 18, United States Code, Sections 1956 or 1957, or pursuant to 18 U.S.C. § 981(a)(1)(C) because they constitute or are derived from proceeds traceable to an offense

constituting “specified unlawful activity” (as defined in 18 U.S.C. § 1956(c)(7)), namely wire fraud in violation of 18 U.S.C. § 1343, or conspiracy to commit such offense.

**ACQUISITION OF 51 PARCELS OF PROPERTY BY  
MENACHEM LEVITIN AND HIS ENTITIES**

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**REAL PROPERTY DEFENDANT NO. (1) 197-199 BASSETT STREET**

8. Real property defendant no. 1, located at 197-199 Bassett Street, was acquired by New Haven Investment Group, LLC from HSBC Bank for \$55,200, by special warranty deed, dated January 15, 2010, and recorded in Volume 8506, at Page 263 of the New Haven Land Records.

9. According to the Assessor for the City of New Haven, 197-199 Bassett Street is assessed at \$114,730.

**REAL PROPERTY DEFENDANT NO. (2) 25-29 BATTER TERRACE**

10. Real property defendant no. 2, located at 25-29 Batter Terrace, was acquired by Solo Investments, LLC from HSBC Bank for \$106,750, by warranty deed, dated August 15, 2008, in Volume 8271, at Page 151 of the New Haven Land Records. On February 26, 2009, Solo Investments, by Menachem Levitin, transferred title to the property to Menachem Levitin for \$1.00, by quit claim deed, dated February 26, 2009, and recorded on February 27, 2009, in Volume 8349, at Page 132 of the New Haven Land Records.

11. According to the Assessor for the City of New Haven, 25-29 Batter Terrace is assessed at \$176,890.

**REAL PROPERTY DEFENDANT NO. (3) 81-83 BEERS STREET**

12. Real property defendant no. 3, located at 81-82 Beers Street, was acquired by Menachem Levitin from U.S. Bank, Trustee for \$165,000, by warranty deed, dated June 26, 2008, in Volume 8241, at Page 53 of the New Haven Land Records. On July 2, 2008, Menachem Levitin transferred title to the property to Parnosa, LLC for \$1.00 by quit claim deed, dated July 2, 2008, and recorded on July 7, 2008, in Volume 8241, at Page 55 of the New Haven Land Records.

13. According to the Assessor for the City of New Haven, 81-83 Beers Street is assessed at \$222,740.

**REAL PROPERTY DEFENDANT NO. (4) 501 BLATCHLEY AVENUE**

14. Real property defendant no. 4, located at 501 Blatchley Avenue, was acquired by Solo Investments, LLC from Christina Bank and Trust Company for \$62,000.00, by warranty deed, dated October 13, 2008, and recorded on October 14, 2008, in Volume 8306, at Page 261 of the New Haven Land Records. On November 10, 2008, Solo Investments, LLC, by Menachem Levitin, transferred title to the property to Asset Holdings, LLC for \$1.00, by quit claim deed, dated November 10, 2008, and recorded on November 11, 2008, in Volume 8306, at Page 265 of the New Haven Land Records. On November 10, 2008, Asset Holdings, LLC, by Individual A, transferred title to Shemesh, LLC for \$96,000, by warranty deed, dated November 10, 2008, in Volume 8036, at Page 267 of the New Haven Land Records.

15. According to the Assessor for the City of New Haven, 501 Blatchley Avenue is assessed at \$109,410.

**REAL PROPERTY DEFENDANT NO. (5) 136 CARLISLE STREET**

16. Real property defendant no. 5, located at 136 Carlisle Street, was acquired by Solo Investments, LLC, from Deutsche Bank for \$35,600, by warranty deed, dated September 1, 2009, and recorded on September 29, 2009, in Volume 8445, at Page 82 of the New Haven Land Records. On September 10, 2009, Solo Investments, LLC transferred title to the property to Moshe, LLC, by quit claim deed, recorded on September 29, 2009, in Volume 8445, at Page 85 of the New Haven Land Records.

17. According to the Assessor for the City of New Haven, 136 Carlisle Street is assessed at \$115,290.

**REAL PROPERTY DEFENDANT NO. (6) 561 CENTRAL AVENUE**

18. Real property defendant no. 6, located at 561 Central Avenue, was acquired by Menachem Levitin from Deutsche Bank for \$90,000, by special warranty deed, dated October 22, 2008, and recorded on November 6, 2008, in Volume 8303, at Page 198 of the New Haven Land Records.

19. According to the Assessor for the City of New Haven, 561 Central Avenue is assessed at \$234,150.

**REAL PROPERTY DEFENDANT NO. (7) 115 CLAY STREET**

20. Real property defendant no. 7, located at 115 Clay Street, was acquired by Solo Investments, LLC from Lasalle Bank, Trustee for \$52,000, by special warranty deed, dated and recorded on September 12, 2008, in Volume 8277, at Page 330 of the New Haven Land Records.

21. According to the Assessor for the City of New Haven, 115 Clay Street is assessed at \$143,220.



**REAL PROPERTY DEFENDANT NO. (8) 15 COLBY COURT**

22. Real property defendant no. 8, located at 15 Colby Court, was acquired by Solo Investments, LLC, from Deutsche Bank, Trustee for \$75,500, by quit claim deed, dated December 3, 2008, and recorded on December 9, 2008, in Volume 8315, at Page 300 of the New Haven Land Records. On December 8, 2008, Solo Investments, LLC, by Menachem Levitin, transferred title to the property to New Haven Investment Group, LLC for \$1.00, by quit claim deed, dated and recorded on December 8, 2008, in Volume 8315, at Page 303 of the New Haven Land Records.

23. According to the Assessor for the City of New Haven, 15 Colby Court is assessed at \$166,460

**REAL PROPERTY DEFENDANT NO. (9) 141 COUNTY STREET**

24. Real property defendant no. 9, located at 141 County Street, was acquired by Menachem Levitin from Deutsche Bank Trust Company, Trustee for \$91,000, by limited warranty deed, dated April 15, 2008, and recorded on May 5, 2008, in Volume 8200, at Page 286 of the New Haven Land Records. On April 25, 2008, Menachem Levitin transferred title to the property to Solo Investments, LLC for \$1.00, by quit claim deed, dated April 25, 2008, and recorded on May 5, 2008, in Volume 8200, at Page 289 of the New Haven Land Records. On June 19, 2008, Solo Investments, LLC transferred title to the property to Menachem Levitin for \$1.00, by quit claim deed, dated June 19, 2008, and recorded on June 25, 2008, in Volume 8233, at Page 114 of the New Haven Land Records.

25. According to the Assessor for the City of New Haven, 141 County Street is assessed at \$142,310.

**REAL PROPERTY DEFENDANT NO. (10) 270 DAVENPORT AVENUE**

26. Real property defendant no. 10, located at 270 Davenport Avenue, was purchased by Individual Number 4 for \$260,000, by warranty deed, dated January 2, 2007, and recorded on January 4, 2007, in Volume 7837, at Page 148 of the New Haven Land Records. Individual Number 4 obtained a first mortgage from GMAC Mortgage, LLC in the original principal amount of \$208,000, which mortgage is recorded in Volume 7837, at Page 150, and a second mortgage in the original principal amount of \$39,000, which mortgage is recorded in Volume 7837, at Page 169. On February 25, 2008, GMAC Mortgage, LLC recorded a lis pendens giving notice of the pendency of a foreclosure action against Individual Number 4. On July 21, 2008, GMAC Mortgage, LLC recorded a Certificate of Foreclosure. On July 28, 2008, GMAC Mortgage, LLC transferred title to the property to Federal National Mortgage Association by quit claim deed, recorded on July 28, 2008, in Volume 8251, at Page 191. On September 24, 2008, Fannie Mae, a.k.a. Federal National Mortgage Association sold the property to Solo Investments, LLC \$52,000, by warranty deed, dated and recorded on September 24, 2008, in Volume 8283, at Page 90 of the New Haven Land Records.

27. According to the Assessor for the City of New Haven, 270 Davenport Avenue is assessed at \$84,350.

**REAL PROPERTY DEFENDANT NO. (11) 280 DAVENPORT AVENUE**

28. Real property defendant no. 11, located at 280 Davenport Avenue, was acquired by Solo Investments, LLC from Deutsche Bank, Trustee for \$23,800, by quit claim deed, dated August 31, 2009, and recorded on September 14, 2009, in Volume 8439, at Page 175 of the New Haven Land Records.

29. According to the Assessor for the City of New Haven, 280 Davenport Avenue is assessed at \$91,000.

**REAL PROPERTY DEFENDANT NO. (12) 108 DEWITT STREET**

30. Real property defendant no. 12, located at 108 Dewitt Street, was purchased by Individual Number 1 for \$150,000 on October 27, 2004. On July 26, 2005, Individual Number 1 sold the property to Individual Number 2 for \$235,000, which warranty deed was recorded on July 27, 2005, in Volume 7273, at Page 245 of the New Haven Land Records. On March 20, 2009, Bank of New York, Trustee for GMAC Mortgage recorded a Certificate of Foreclosure in Volume 8357, at Page 168. On April 23, 2009, Batia, LLC purchased the property from Bank of New York as Trustee for \$55,000, by warranty deed, dated April 23, 2009, and recorded on May 29, 2009, in Volume 8389, at Page 37. On May 22, 2009, Batia, LLC, by Menachem Levitin, transferred title to Asset Holdings, LLC for \$1.00, by quit claim deed, dated May 22, 2009, in Volume 8389, at Page 39. On May 22, 2009, Asset Holdings, LLC, by Individual A, transferred title to Shemesh, LLC for \$121,000, by warranty deed, dated May 22, 2009, and recorded on May 29, 2009, in Volume 8389, at Page 40.

31. According to the Assessor for the City of New Haven, 108 Dewitt Street is assessed at \$133,420.

**REAL PROPERTY DEFENDANT NO. (13) 205-207 DOVER STREET**

32. Real property defendant no. 13, located at 205-207 Dover Street, was acquired by Solo Investments, LLC from Federal Home Loan Mortgage Corporation for \$82,000, by warranty deed, dated December 17, 2008, and recorded on December 19, 2008, in Volume 8321, at Page 69 of the New Haven Land Records.

33. According to the Assessor for the City of New Haven, 205-207 Dover Street is assessed at \$149,240.

**REAL PROPERTY DEFENDANT NO. (14) 161 EDGEWOOD AVENUE**

34. Real property defendant no. 14, located at 161 Edgewood Avenue, was acquired by Menachem Levitin and Individual B for \$315,000 by warranty deed, dated September 10, 2007, and recorded on September 17, 2007, in Volume 8059, at Page 290 of the New Haven Land Records. On September 24, 2007, Menachem Levitin and Individual B transferred title to the property to 161 Edgewood LLC for \$1.00, by quit claim deed, dated September 24, 2007, and recorded on October 18, 2007, in Volume 8200, at Page 242 of the New Haven Land Records.

35. Washington Mutual Bank may have an interest in real property defendant no. 14 by virtue of a mortgage in the original principal amount of \$309,000, which mortgage is dated May 2, 2008, and recorded in Volume 8200, at Page 242 of the New Haven Land Records.

36. According to the Assessor for the City of New Haven, 161 Edgewood Avenue is assessed at \$244,860.

**REAL PROPERTY DEFENDANT NO. (15) 357 ELLSWORTH AVENUE**

37. Real property defendant no. 15, located at 357 Ellsworth Avenue, was purchased by Individual Number 3 for \$342,000, by warranty deed, witnessed by Menachem Levitin, dated and recorded on June 28, 2007, in Volume 799, at Page 135 of the New Haven Land Records. On June 28, 2007, a mortgage in the original principal amount of \$307,800 to Sterling Empire Funding was witnessed by Menachem Levitin and recorded in Volume 7995, at Page 139. On or about August 19, 2008, Countrywide Home Loan Services recorded a lis pendens giving notice of the pendency of a foreclosure action against Individual 3. On or about November 19, 2009,

Countrywide Home Loan Services recorded a Certificate of Foreclosure in Volume 8469, at Page 162. On or about November 16, 2009, Countrywide Home Loan Services conveyed title to Federal National Mortgage Association by quit claim deed recorded in Volume 8469, at Page 165. On February 10, 2009, Menachem Levitin purchased the property from Federal National Mortgage Association for \$104,000.00, by warranty deed recorded in Volume 8506, at Page 288 of the New Haven Land Records.

38. According to the Assessor for the City of New Haven, 357 Ellsworth Avenue is assessed at \$178,150.

**REAL PROPERTY DEFENDANT NO. (16) 363 ELLSWORTH AVENUE**

39. Real property defendant no. 16, located at 363 Ellsworth Avenue, was purchased by Individual Number 3 for \$299,900, by warranty deed, dated June 21, 2007, and recorded on June 28, 2007, in Volume 7995, at Page 100 of the New Haven Land Records. On or about June 19, 2007, a mortgage in the original principal amount of \$221,925 to First Meridian Mortgage was witnessed by Menachem Levitin and recorded in Volume 7795, at Page 103. On June 20, 2007, a second mortgage in the original principal amount of \$44,385 to Countrywide Mortgage was witnessed by Menachem Levitin and recorded in Volume 7795, at Page 124. On or about August 28, 2008, HSBC Bank USA, NA, Trustee recorded a lis pendens giving notice of the pendency of a foreclosure action against Individual Number 3. On or about May 5, 2009, HSBC Bank USA, NA, Trustee, recorded a Certificate of Foreclosure in Volume 8378, at Page 318. On April 15, 2009, Menachem Levitin purchased the property from HSBC Bank, USA, NA, Trustee, for \$86,200, by special warranty deed, recorded in Volume 8373, at Page 79 of the New Haven Land Records.

40. According to the Assessor for the City of New Haven, 363 Ellsworth Avenue is assessed at \$151,830.

**REAL PROPERTY DEFENDANT NO. (17) 212-214 ENGLISH**

41. Real property defendant no. 17, located at 212-214 English Street, was acquired by Solo Investments, LLC from Countrywide Bank for \$65,200, by special limited warranty deed, dated March 20, 2009, and recorded on April 20, 2009, in Volume 8370, at Page 334 of the New Haven Land Records. On April 24, 2009, Solo Investments, LLC, by Menachem Levitin, transferred title to Batia, LLC for \$1.00, by quit claim deed, dated April 24, 2009, and recorded on May 12, 2009, in Volume 8381, at Page 174 of the New Haven Land Records.

42. According to the Assessor for the City of New Haven, 212-214 English Street is assessed at \$134,400.

**REAL PROPERTY DEFENDANT NO. (18) 286 EXCHANGE STREET**

43. Real property defendant no. 18, located at 286 Exchange Street, was acquired by White Oak New Haven, LLC, from Capital Financial LLC for \$82,000, by warranty deed, dated December 12, 2008, and recorded on December 23, 2008, in Volume 8321, at Page 275 of the New Haven Land Records.

44. According to the Assessor for the City of New Haven, 286 Exchange Street is assessed at \$149,940.

**REAL PROPERTY DEFENDANT NO. (19) 299 GREENWICH AVENUE**

45. Real property defendant no. 19, located at 299 Greenwich Avenue, was acquired by Moshe, LLC from New Rich Development, LLC for \$30,200, by warranty deed, dated November 23, 2009, and recorded in Volume 8461, at Page 225 of the New Haven Land Records.

46. According to the Assessor for the City of New Haven, 299 Greenwich Avenue is assessed at \$79,380.

**REAL PROPERTY DEFENDANT NO. (20) 222 HALLOCK AVENUE**

47. Real property defendant no. 20, located at 222 Hallock Avenue, was acquired by Solo Investments, LLC from HSBC Bank for \$77,600, by warranty deed, dated October 3, 2008, and recorded on November 14, 2008, in Volume 8306, at Page 271 of the New Haven Land Records. On November 7, 2008, Solo Investments, LLC, by Menachem Levitin, transferred title to Asset Holdings, LLC for \$1.00, by quit claim deed, dated November 7, 2008, and recorded on November 14, 2008, in Volume 8306, at Page 274. On January 7, 2008, Asset Holdings, LLC transferred title to Beit Aviv, LLC for \$115,000, by warranty deed, dated January 7, 2008, and recorded in Volume 8306, at Page 276 of the New Haven Land Records.

48. According to the Assessor for the City of New Haven, 222 Hallock Avenue is assessed at \$112,420.

**REAL PROPERTY DEFENDANT NO. (21) 89 HAZEL STREET**

49. Real property defendant no. 21, located at 89 Hazel Street, was acquired by Solo Investments, LLC from U.S. Bank National Association for \$27,100, by warranty deed, dated February 1, 2010, and recorded in Volume 8507, at Page 285 of the New Haven Land Records. Solo Investments, LLC, by Menachem Levitin, transferred title to VIK Holdings, LLC for \$1.00, by quit claim deed, dated February 9, 2010, and recorded in Volume 8507, at Page 288 of the New Haven Land Records.

50. According to the Assessor for the City of New Haven, 89 Hazel Street is assessed at \$97,160.

**REAL PROPERTY DEFENDANT NO. (22) 314 HOWARD AVENUE**

51. Real property defendant no. 22, located at 314 Howard Avenue, was acquired by Solo Investments, LLC from HSBC Mortgage Services, for \$120,000.00, by deed dated November 4, 2008, and recorded on November 11, 2008, in Volume 8305, at Page 231 of the New Haven Land Records. Solo Investments, LLC, by Menachem Levitin, transferred title to Asset Holdings, LLC for \$1.00, by quit claim deed, dated October 31, 2009, and recorded on November 12, 2008, in Volume 8305, at Page 235. Asset Holdings, LLC, by Individual A, transferred title to the property to Shemesh, LLC for \$186,000, by warranty deed, dated November 4, 2008, and recorded on November 12, 2008, in Volume 8305, at Page 233 of the New Haven Land Records.

52. According to the Assessor for the City of New Haven, 314 Howard Avenue is assessed at \$194,880.

**REAL PROPERTY DEFENDANT NO. (23) 490 HOWARD AVENUE**

53. Real property defendant no. 23, located at 490 Howard Avenue, was acquired by New Haven Investment Group, LLC from U.S. Bank, Trustee for \$45,000, by special warranty deed, dated January 5, 2010, and recorded in Volume 8495, at Page 30 of the New Haven Land Records.

54. According to the Assessor for the City of New Haven, 490 Howard Avenue is assessed at \$111,790.

**REAL PROPERTY DEFENDANT NO. (24) 456 HUNTINGTON STREET**

55. Real property defendant no. 24, located at 456 Huntington Street, was acquired by Solo Investment Group, LLC from U.S. Bank, Trustee for \$28,000, by special warranty deed,



dated January 15, 2010, and recorded in Volume 8499, at Page 94 of the New Haven Land Records. On January 24, 2010, Solo Investments, LLC, by Menachem Levitin, transferred title to New Haven Investment Group, LLC for \$1.00, by quit claim deed, dated January 24, 2010, and recorded in Volume 8499, at Page 97 of the New Haven Land Records.

56. According to the Assessor for the City of New Haven, 456 Huntington Street is assessed at \$89,530.

**REAL PROPERTY DEFENDANT NO. (25) 88-89 HURLBURT STREET**

57. Real property defendant no. 25, located at 88-89 Hurlburt Street, was acquired by Tami Research & Development, LLC from Citimortgage, Inc. for \$57,000, by warranty deed, dated November 3, 2008, and recorded on November 28, 2008, in Volume 8312, at Page 73 of the New Haven Land Records. Tami Research & Development, LLC, by Menachem Levitin, transferred title to New Haven Capital Investment, LLC for \$1.00, by quit claim deed, dated November 24, 2008, and recorded on November 28, 2008, in Volume 8312, at Page 76. New Haven Capital Investment, LLC, by Menachem Levitin, transferred title to New Haven Investment Group, LLC for \$1.00, by quit claim deed, dated February 11, 2009, and recorded on February 12, 2009, in Volume 8343, at Page 312 of the New Haven Land Records.

58. According to the Assessor for the City of New Haven, 88-89 Hurlburt Street is assessed at \$120,260.

**REAL PROPERTY DEFENDANT NO. (26) 186 JAMES STREET**

59. On January 5, 2007, Individual Number 1 purchased real property defendant no. 26, located at 186 James Street, for \$262,000, by warranty deed, recorded on January 9, 2007, in Volume 7840, at Page 146 of the New Haven Land Records. Also on January 5, 2007,

Individual Number 1 obtained two mortgages in the amounts of \$185,600 and \$34,800 from Countrywide Home Loans, Inc., which mortgages are recorded in Volume 7840, page 148, and Volume 7840, Page 165, respectively, of the New Haven Land Records. On or about January 23, 2008, Countrywide Home Loans, Inc. recorded a lis pendens giving notice of a foreclosure action against Individual Number 1. In a short sale, Menachem Levitin purchased the property from Individual 1 for \$105,000, by warranty deed, dated and recorded on September 17, 2008, in Volume 8279, at Page 343. Menachem Levitin transferred title to Tami Research & Development, LLC for \$1.00, by quit claim deed, dated September 15, 2008 and recorded on September 17, 2008, in Volume 8279, at Page 345. Tami Research & Development, LLC, by Menachem Levitin, transferred title to New Haven Investment Group, LLC, by quit claim deed dated December 2, 2009, and recorded in Volume 8473, at Page 21 of the New Haven Land Records.

60. According to the Assessor for the City of New Haven, 186 James Street is assessed at \$132,090.

**REAL PROPERTY DEFENDANT NO. (27) 265 JAMES STREET**

61. Real property defendant no. 27, located at 265 James Street, was acquired by Menachem Levitin from Novastar Mortgage for \$95,000, by deed, dated March 27, 2008, and recording on April 8, 2008, in Volume 8184, at Page 6 of the New Haven Land Records. Menachem Levitin transferred title to Solo Investments, LLC for \$1.00, by quit claim deed, dated April 3, 2008, and recorded on April 8, 2008, in Volume 8184, at Page 7. Solo Investments, LLC, by Menachem Levitin, transferred title to Menachem Levitin for \$1.00, by quit claim deed,

dated June 19, 2008, and recorded on June 25, 2008, in Volume 8233, at Page 110 of the New Haven Land Records.

62. Flagstaff Bank may have an interest in real property defendant no. 27 by virtue of a mortgage in the original principal amount of \$140,000, dated January 5, 2009, and recorded in Volume 8328, at Page 63 of the New Haven Land Records.

63. According to the Assessor for the City of New Haven, 265 James Street is assessed at \$149,310.

**REAL PROPERTY DEFENDANT NO. (28) 382 LOMBARD STREET**

64. Real property defendant no. 28, located at 385 Lombard Street, was acquired by Solo Investments, LLC from Bank of New York for \$166,600, by special limited warranty deed, dated October 2, 2008, and recorded on October 30, 2008, in Volume 8300, at Page 279 of the New Haven Land Records. Solo Investments, LLC, by Menachem Levitin, transferred title to Asset Holdings, LLC for \$1.00, by quit claim deed, dated October 24, 2008, and recorded on October 30, 2008, in Volume 8300, at Page 281. Asset Holdings, LLC transferred the property to Beit Aviv, LLC for \$206,000, by warranty deed, dated October 24, 2008, and recorded on October 30, 2008, in Volume 8300, Page 283 of the New Haven Land Records.

65. According to the Assessor for the City of New Haven, 382 Lombard Street is assessed at \$158,690.

**REAL PROPERTY DEFENDANT NO. (29) 19-21 NORTON STREET**

66. Real property defendant no. 29, located at 19-21 Norton Street, was acquired by Parnosa, LLC from Deutsche Bank, Trustee for \$75,000, by warranty deed, dated August 8,

2008, and recorded on August 20, 2008, in Volume 8266, at Page 149 of the New Haven Land Records.

67. According to the Assessor for the City of New Haven, 19-21 Norton Street is assessed at \$151,970.

**REAL PROPERTY DEFENDANT NO. (30) 279-281 NORTON STREET**

68. On March 8, 2007, Individual Number 3 purchased real property defendant no. 30 located, at 279-281 Norton Street, for \$363,000, by warranty deed (witnessed by Menachem Levitin), recorded on March 15, 2007, in Volume 7902, at Page 169 of the New Haven Land Records. On March 9, 2007, Individual Number 3 obtained two mortgages in the amounts of \$288,000 and \$36,00 from First Meridian Mortgage, which mortgages are recorded in Volume 79020, page 172, and Volume 7902, Page 189, respectively. On or about July 29, 2008, HSBC Bank, USA, NA, Trustee, recorded a lis pendens giving notice of a foreclosure action against Individual Number 3. On April 26, 2009, HSBC, Bank, USA, NA obtained a Certificate of Foreclosure which is recorded in Volume 8404, at Page 172. Solo Investments, LLC acquired the property from HSBC Bank, Trustee for \$112,000, by special warranty deed, dated October 5, 2009, and recorded in Volume 8451, at Page 284 of the New Haven Land Records.

69. According to the Assessor for the City of New Haven, 279-281 Norton Street is assessed at \$175,630.

**REAL PROPERTY DEFENDANT NO. (31) 353 ORCHARD STREET**

70. Real property defendant no. 31, located at 385 Orchard Street, was acquired by L & I Investments, LLC from Federal National Mortgage Association, for \$66,200 by warranty deed,

dated February 24, 2009, and dated February 27, 2009, in Volume 8349, at Page 129 of the New Haven Land Records.

71. According to the Assessor for the City of New Haven, 353 Orchard Street is assessed at \$121,170.

**REAL PROPERTY DEFENDANT NO. (32) 378-380 ORCHARD STREET**

72. Real property defendant no. 32, located at 378-280 Orchard Street, was acquired by Solo Investments, LLC from Bank of New York Mellon, for \$97,000 by warranty deed, dated September 23, 2009, and recorded on October 1, 2009, in Volume 8446, at Page 239 of the New Haven Land Records.

73. According to the Assessor for the City of New Haven, 378-380 Orchard Street is assessed at \$164,220.

**REAL PROPERTY DEFENDANT NO. (33) 95 PARDEE STREET**

74. Real property defendant no. 33, located at 95 Pardee Street, was acquired by Solo Investments, LLC from Deutsche Bank, Trustee, for \$43,300, by special warranty deed, dated July 9, 2009, and recorded on July 17, 2009, in Volume 8412, at Page 108 of the New Haven Land Records.

75. According to the Assessor for the City of New Haven, 95 Pardee Street is assessed at \$127,680.

**REAL PROPERTY DEFENDANT NO. (34) 122-124 PLYMOUTH STREET**

76. Real property defendant no. 34, located at 122-124 Plymouth Street, was acquired by Menachem Levitin from Daniel and Virginia Sparano for \$165,000, by warranty deed, dated April 3, 2008, and recorded on April 8, 2008, in Volume 8184, at Page 8 of the New Haven Land

Records. Menachem Levitin transferred title to Solo Investments, LLC for \$1.00, by quit claim deed, dated April 3, 2008, and recorded on April 8, 2008, in Volume 8184, at Page 11. Solo Investments LLC, by Menachem Levitin, transferred title to Menachem Levitin for \$1.00, by quit claim deed, dated June 19, 2008, and recorded on June 25, 2008, in Volume 8233, at Page 112 of the New Haven Land Records.

77. Citimortgage, Inc. may have an interest in real property defendant no. 34 by virtue of a mortgage in the original principal amount of \$245,000, dated August 14, 2008, and recorded in Volume 8265, at Page 129 of the New Haven Land Records.

78. According to the Assessor for the City of New Haven, 122 Plymouth Street is assessed at \$203,350, and 124 Plymouth Street (vacant land) is assessed at \$22,400.

**REAL PROPERTY DEFENDANT NO. (35) 97-99 ROCK CREEK ROAD**

79. Real property defendant no. 35, located at 97-99 Rock Creek Road, was acquired by Asset Holdings, LLC from HSBC Bank USA for \$80,300, by warranty deed, dated May 22, 2009, and recorded in Volume 8389, at Page 42 of the New Haven Land Records. Asset Holdings, LLC, by Individual A, transferred title to Shemesh, LLC for \$140,000, by quit claim Deed dated May 26, 2009 in Volume 8389, at Page 44 of the New Haven Land Records.

80. According to the Assessor for the City of New Haven, 97-99 Rock Creek Road is assessed at \$203,350.

**REAL PROPERTY DEFENDANT NO. (36) 41 SHEFFIELD AVENUE**

81. Real property defendant no. 36, located at 41 Sheffield Avenue, was acquired by Solo Investments, LLC from Citimortgage Inc., for \$45,000, by warranty deed, dated February 8, 2010, and recorded in Volume 8506, at Page 266 of the New Haven Land Records.

82. According to the Assessor for the City of New Haven, 41 Sheffield Avenue is assessed at \$149,380.

**REAL PROPERTY DEFENDANT NO. (37) 8 SHELTER STREET**

83. Real property defendant no. 37, located at 8 Shelter Street, was acquired by L & I Investments, LLC from GMAC Mortgage, LLC for \$129,600, by warranty deed, dated and recorded on June 19, 2008, in Volume 8229, at Page 110 of the New Haven Land Records.

84. According to the Assessor for the City of New Haven, 8 Shelter Street is assessed at \$136,360

**REAL PROPERTY DEFENDANT NO. (38) 37-39 SHELTER STREET**

85. Real property defendant no. 38, located at 37-39 Shelter Street, was acquired by Solo Investments, LLC from HSBC Mortgage Services for \$10.00 (transfer tax of \$324.50 indicates purchase prices was \$64,900), by special limited warranty deed, dated August 20, 2009, and recorded on September 11, 2009, in Volume 8437, at Page 331 of the New Haven Land Records. Solo Investments, LLC, by Menachem Levitin, transferred title to Moshe, LLC for \$1.00, by quit claim deed, dated August 31, 2009, and recorded on September 11, 2009, in Volume 8437, at Page 334 of the New Haven Land Records.

86. According to the Assessor for the City of New Haven, 37-39 Shelter Street is assessed at \$149,380.

**REAL PROPERTY DEFENDANT NO. (39) 140 SHELTON AVENUE**

87. Real property defendant no. 39, located at 140 Shelton Avenue, was acquired by L & I Investments, LLC from U.S. Bank Trust for \$90,500, by warranty deed, dated and recorded on December 19, 2008, in Volume 8321, at Page 62 of the New Haven Land Records.

88. According to the Assessor for the City of New Haven, 140 Shelton Avenue is assessed at \$191,030.

**REAL PROPERTY DEFENDANT NO. (40) 418 SHELTON AVENUE**

89. Real property defendant no. 40, located at 418 Shelton Avenue, was acquired by Solo Investments, LLC from Novastar Mortgage Inc. for \$57,200, by special warranty deed, dated June 29, 2009, and recorded on July 8, 2009, in Volume 8408, at Page 192 of the New Haven Land Records. Solo Investments, LLC, by Menachem Levitin, transferred title to Asset Holdings, LLC for \$1.00, by quit claim deed, dated July 6, 2009, and recorded in Volume 8408, at Page 195. Asset Holdings, LLC, Individual A, transferred title to Shemesh, LLC for \$111,500, by warranty deed, dated July 6, 2009, and recorded on July 8, 2009, in Volume 8408, at Page 196 of the New Haven Land Records.

90. According to the Assessor for the City of New Haven, 418 Shelton Avenue is assessed at \$166,390.

**REAL PROPERTY DEFENDANT NO. (41) 334-336 SHERMAN AVENUE**

91. The real property defendant no. 41, located at 334-336 Sherman Avenue, was acquired by L & I Investmetns, LLC from New England Properties, LLC for \$88,000, by warranty deed, dated March 20, 2009, and recorded on March 25, 2009, at Volume 8359, at Page 203 of the New Haven Land Records. L & I Investments, LLC transferred title to Solo Investments, LLC for \$1.00, by quit claim deed, dated April 7, 2009, and recorded on April 22, 1009, in Volume 8372, at Page 158. Solo Investments, LLC, by Menachem Levitin, transferred title to New Haven Investment Group, LLC for \$1.00, by quit claim deed, dated January 13, 2010, and recorded in Volume 8492, at Page 18 of the New Haven Land Records.



92. According to the Assessor for the City of New Haven, 334-336 Sherman Avenue is assessed at \$234,570.

**REAL PROPERTY DEFENDANT NO. (42) 342 SHERMAN AVENUE**

93. Real property defendant no. 42, located at 342 Sherman Avenue, was acquired by Solo Investments, LLC from HSBC Bank for \$131,200, by special warranty deed, dated June 23, 2009, and recorded on July 13, 2009, in Volume 8410, at Page 217 of the New Haven Land Records. Solo Investments, LLC, by Menachem Levitin, transferred title to Asset Holdings, LLC for \$1.00, by quit claim deed, dated July 8, 2009, and recorded on July 14, 2009, in Volume 8410, at Page 220. Asset Holdings, LLC, by Individual A, transferred title to Shemesh, LLC for \$196,600, by warranty deed, dated July 8, 2009, and recorded on July 14, 2009, in Volume 8410, at Page 221 of the New Haven Land Records.

94. According to the Assessor for the City of New Haven, 342 Sherman Avenue is assessed at \$189,140.

**REAL PROPERTY DEFENDANT NO. (43) 55-57 THOMPSON STREET**

95. Real property defendant no. 43, located at 55-57 Thompson Street, was acquired by Asset Holdings, LLC from JPMC Specialty Mortgage, LLC for \$101,200, by limited warranty deed, dated April 24, 2009, and recorded on May 14, 2009, in Volume 8383, at Page 65 of the New Haven Land Records. Asset Holdings, LLC, by Individual A, conveyed the property to Shemesh, LLC for \$208,000, by warranty deed, dated May 11, 2009, and recorded on May 14, 2009, in Volume 8383, at Page 67 of the New Haven Land Records.

96. According to the Assessor for the City of New Haven, 55-57 Thompson Street is assessed at \$288,190.

**REAL PROPERTY DEFENDANT NO. (44) 443 VALLEY STREET**

97. Real property defendant no. 44, located at 443 Valley Street, was acquired by Solo Investments, LLC from U.S. Bank National Association for \$30,000, by warranty deed, dated August 26, 2008, and recorded in Volume 8446, at Page 242 of the New Haven Land Records.

98. According to the Assessor for the City of New Haven, 443 Valley Street is assessed at \$94,150.

**REAL PROPERTY DEFENDANT NO. (45) 56-58 VICTORY DRIVE**

99. Real property defendant no. 45, located at 56-58 Victory Drive, was acquired by Solo Investments, LLC from Bank of America for \$100,600, by warranty deed, dated November 4, 2008, and recorded on December 17, 2008, in Volume 8319, at Page 287 of the New Haven Land Records. Solo Investments, LLC, by Menachem Levitin, transferred title to Asset Holdings, LLC for \$1.00, by quit claim deed, dated December 15, 2008, and recorded on December 17, 2008, in Volume 8319, at Page 290. Asset Holdings, LLC, by Individual A, conveyed the property to Shemesh, LLC for \$156,000, by warranty deed, dated December 15, 2008, and recorded on December 17, 2008, in Volume 8319, at Page 292 of the New Haven Land Records.

100. According to the Assessor for the City of New Haven, 56-58 Victory Drive is assessed at \$139,370.

**REAL PROPERTY DEFENDANT NO. (46) 159 WEST STREET**

101. Real property defendant no. 46, located at 159 West Street, was acquired by New Haven Investment Group, LLC from Bank of America for \$10.00 and other valuable consideration (tax stamps of \$130.00 indicate a purchase price of \$26,000), by special limited

warranty deed, dated January 6, 2010, and recorded in Volume 8491, at Page 335 of the New Haven Land Records.

102. According to the Assessor for the City of New Haven, 159 West Street is assessed at \$86,940.

**REAL PROPERTY DEFENDANT NO. (47) 579-581 WHALLEY AVENUE**

103. Real property defendant no. 47, located at 579-581 Whalley Avenue, was acquired by L & I Investments, LLC from Guardian Investments, LLC for \$173,000, by warranty deed, dated and recorded on June 20, 2008, in Volume 8229, at Page 184 of the New Haven Land Records.

104. According to the Assessor for the City of New Haven, 579-581 Whalley Avenue is assessed at \$212,520.

**REAL PROPERTY DEFENDANT NO. (48) 583-585 WINCHESTER AVENUE**

105. Real property defendant no. 48, located at 583-585 Winchester Avenue, was acquired by New Haven Investment LLC from Bank of New York, Trustee for \$41,900, by special limited warranty deed, dated March 4, 2009, and recorded on April 20, 2009, in Volume 8370, at Page 331 of the New Haven Land Records. New Haven Investment Group, LLC, by Menachem Levitin, transferred title to Asset Holdings, LLC for \$1.00, by quit claim deed, dated April 6, 2009, and recorded on April 29, 2009, in Volume 8376, at Page 74. Asset Holdings, LLC transferred title to Shemesh, LLC for \$96,000, by warranty deed, dated April 13, 2009, and recorded on April 29, 2009, in Volume 8376, at Page 76 of the New Haven Land Records.

106. According to the Assessor for the City of New Haven, 583-585 Winchester Avenue is assessed at \$188,790.

**REAL PROPERTY DEFENDANT NO. (49) 872-874 WINCHESTER AVENUE**

107. Real property defendant no. 49, located at 872-874 Winchester Avenue, was acquired by Solo Investments, LLC from Robert Kielbasa, Jr. for \$51,000, by administrator's deed, dated May 1, 2009, and May 7, 2009, in Volume 8379, at Page 276 of the New Haven Land Records. Solo Investments, LLC, by Menachem Levitin, transferred title to Batia, LLC for \$1.00, by quit claim deed, on May 5, 2009, and recorded on May 7, 2009, in Volume 8379, at Page 279 of the New Haven Land Records.

108. According to the Assessor for the City of New Haven, 872-874 Winchester Avenue is assessed at \$128,870.

**REAL PROPERTY DEFENDANT NO. (50) 510 WINTHROP AVENUE**

109. Real property defendant no. 50, located at 510 Winthrop Avenue, was acquired by Solo Investments, LLC from J.P. Morgan Chase, Trustee for \$59,900, by special warranty deed, dated June 30, 2009, and recorded on August 20, 2009, in Volume 8429, at Page 1 of the New Haven Land Records. Solo Investments, LLC, by Menachem Levitin, transferred title to Asset Holdings, LLC for \$1.00, by quit claim deed, dated August 11, 2009, and recorded on August 20, 2009, in Volume 8429, at Page 4. Asset Holdings, LLC, by Individual A, transferred title to ADM Holdings, LLC for \$85,700, by warranty deed, dated August 11, 2009, and recorded on August 20, 2009, in Volume 8429, at Page 5 of the New Haven Land Records.

110. According to the Assessor for the City of New Haven, 510 Winthrop Avenue is assessed at \$131,040.

**REAL PROPERTY DEFENDANT NO. (51) 573 WINTHROP AVENUE**

111. Real property defendant no. 51, located at 573 Winthrop Avenue, was acquired by New Haven Investment Group, LLC from Bank of New York, Trustee for \$114,000, by special warranty deed, dated December 16, 2008, and recorded on December 30, 2008, in Volume 8324, at Page 161 of the New Haven Land Records.

112. According to the Assessor for the City of New Haven, 573 Winthrop Avenue is assessed at \$203,210.

**THE SCHEME UNDER INVESTIGATION**

113. Special agents of the Federal Bureau of Investigation (FBI) have been investigating a mortgage fraud scheme in New Haven individual buyers, and Connecticut real estate brokers and sales people, mortgage brokers, and attorneys. It involves real estate transactions involving the 51 real property defendants which consist of multi-family rental properties.

114. The Federal Bureau of Investigation 2007 Mortgage Fraud Report describes a number of mortgage fraud schemes, including "seller assistance scams" and "short sale scams." In a typical seller assistance scam, a perpetrator solicits an anxious seller or his real estate agent and offers to find a buyer for the property. The perpetrator negotiates the amount that the property seller is willing to accept for the home. The perpetrator then hires an appraiser to inflate the property's value above the negotiated amount. The property is sold to a buyer who is recruited by the perpetrator, and the sale documents reflect the inflated amount. The buyer takes out a mortgage for the inflated amount. The seller then receives the asking price for the home (which is lower than the inflated price), and the perpetrator either receives the difference between

the home's market value and the fraudulently inflated value or distributes the difference among participants in the fraud. When the mortgage defaults, the lender forecloses on the house, but is unable to sell it for the amount owed as a result of the inflated value. Some industry sources have coined the phrase "cash back purchase" or "one transaction flip" to describe the scheme, because it eliminates the need for two property transactions to generate a profit.

115. A real estate short sale is a type of pre-foreclosure sale in which the lender agrees to sell a property for less than the mortgage owed. In a typical short sale scheme, the perpetrator uses a straw buyer to purchase a home for the purpose of defaulting on the mortgage. Payments are not made on the property loan so that the mortgage defaults. Prior to the foreclosure sale, the perpetrator offers to purchase the property from the lender in a short sale agreement. The lender agrees without knowing that the short sale was premeditated.

116. Special agents of the FBI have reviewed public documents of real estate transactions in New Haven, and listings of real estate for sale through the Multiple Listing Service ("MLS") provided by a local real estate agent. The special agents also obtained the mortgage records of over 50 recently foreclosed multi-family rental properties in New Haven, as well as bank records and credit reports for some of the subjects of this investigation. In addition, the special agents conducted interviews of people with knowledge of some of these real estate transactions.

117. Based upon the investigation to date, there is reasonable cause to believe that Menachem Yosef Levitin, a.k.a. Joseph Levitin, has been involved in mortgage fraud activity that combines seller assistance scams and short sale scams. Levitin is a real estate sales person who lives and works in New Haven, Connecticut.

118. The purchase price of the New Haven rental properties involved in this scam were inflated by as much as \$50,000 to \$100,000 or more to allow the participants in the scheme to extract cash from the fraudulent mortgages the buyers obtained. The mortgage applications for the loans under investigation were usually faxed, or caused to be faxed, by Levitin to mortgage companies and buyers outside the state of Connecticut. After collecting rents and paying the mortgage for a few months to a year or more, the buyers stopped making their mortgage payments and the property went into foreclosure. During the foreclosure process, Levitin tried to purchase many of the houses at a short sale for a fraction of the outstanding mortgage. If the mortgage company did not allow a short sale purchase, Levitin sometimes bid on the houses after the foreclosure.

#### **The Subjects**

119. Menachem Yosef Levitin, a.k.a. Joseph Levitin, is a licensed real estate sales person in Connecticut and has a pending application to be a broker. He has been doing business as Levitin Management, LLC, Prestige Realty, LLC, and Pinsky, Chen & Levitin. He has office space at 419 Whalley Avenue, Suite 202, New Haven. Levitin was the sales person for most of the properties under investigation.

120. Individual Number 1, Individual Number 2, Individual Number 3, Individual Number 4, Individual Number 5, and Individual Number 6 are all out-of-state residents.<sup>1</sup> They are the buyers of most of the properties under investigation. Individual Number 1 was the first one to buy property in New Haven, in December 2003. It appears that he brought the others into

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<sup>1</sup>The names of the individuals are being withheld at this time due to the ongoing criminal investigation.

the mortgage fraud scheme because bank records show that Individual Number 1 received commissions from Levitin and/or the closing attorneys for the other transactions.

**Individual Number 1 - Purchase of Twenty-Two New Haven Houses**

121. Individual Number 1 purchased twenty-two multi-family houses in New Haven from December 31, 2003 to June 22, 2007. His bank records indicate that he invested some money into the repair of at least four of the earliest purchases and then resold those houses to individuals unrelated to this investigation. The remaining houses appear to have been purchased at inflated prices with mortgages close to the reported sale price, which allowed Individual Number 1 to receive cash at the closing. He stopped paying his mortgages starting around July 2007 and fourteen of the houses went into foreclosure. After foreclosure, the houses were sold by the banks for a fraction of what Individual Number 1 claimed to have paid for them. Another house (624-626 Ferry Street) had a fire; Individual Number 1 collected the insurance proceeds and re-sold the property. The remaining three properties (all of which he had purchased between 2003 and 2005) were re-sold to another individual.

122. Based upon law enforcement training and experience, persons engaged in mortgage fraud often produce fraudulent leases for income properties to justify large mortgages. For example, Individual Number 1's loan application dated December 20, 2006 filed with Countrywide Home Loans, Inc. for the mortgage on 186 James Street, New Haven, appears to include fictitious information about the income from at least one of his rental properties. It claimed rental income of \$3,250 per month from a three-family home at 14 Bassett Street, New Haven, which he bought on December 15, 2006. The mortgage application included copies of three leases for 14-16 Bassett Street:



1st floor - Individual C - 6/1/06 - 5/31/07 - \$1050 mo.  
2nd floor - Individual D - 10/1/06 - 9/30/07 - \$1050 mo.  
3rd floor - Individual E - 4/1/06 - 3/31/07 - \$1100 mo.

123. The names of those purported tenants were searched through two paid-for database services that derive their information from credit reports. There were no indications that anyone with those names ever resided at that address or, for that matter, anywhere else in New Haven. Records were obtained from United Illuminating Company for all services provided to tenants at 14-16 Bassett Street from January 1, 2006 to January 1, 2008. Although the leases provided that the tenants were responsible for payment of electric services, United Illuminating has no records of any services provided to Individuals C, D, and E<sup>2</sup> at 14-16 Bassett Street during that period. Instead, Individual Number 1 was billed for the 2nd Floor 14-16 Bassett Street during this time period and another individual was billed for the 3rd Floor. Additionally, a different individual was billed for 16 Bassett Street, which I believe is the 1st Floor. The FBI has reviewed the Bank of America checking account in which Individual Number 1 deposited his rent checks and did not see any payment from anyone with the names listed on the leases submitted in connection with the mortgage application for 14-16 Bassett Street— namely, Individuals C, D, and E.

124. The last property that Individual Number 1 purchased was an apartment building with nine one-bedroom apartments located at 522 Elm Street, New Haven. Before the sale to Individual Number 1, it was listed on the Multiple Listing Service on March 5, 2007 for \$545,000. The MLS sheet claims it was sold on July 5, 2007 for \$525,000, but land records

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<sup>2</sup>The names of the individuals are being withheld at this time due to the ongoing criminal investigation.

show that it was sold to Individual Number 1 on June 22, 2007 for \$670,000. Individual Number 1 obtained two mortgages totaling \$603,000. The HUD settlement statement indicates that Prestige Realty (i.e., Levitin) was paid a commission of \$23,625 (which is 4.5% of \$525,000, but not a round percentage of \$670,000). A check from the Law Firm 1, the closing attorney's law office, in the amount of \$45,414.33 payable to Individual Number 1 was deposited into Individual Number 1's bank account on June 25, 2007. The memo section of the check had the notation "Net-522 Elm Street New Haven." Individual Number 1 made no payments on that mortgage. The property at 522 Elm Street went into foreclosure and after foreclosure was sold for \$200,000. Individual Number 1 stopped paying all of his mortgages after his purchase of 522 Elm Street.

125. Individual Number 1 filed for Chapter 7 Bankruptcy on March 25, 2009. His debts were discharged on July 2, 2009. He listed his motorcycles and cars as having secured claims. The creditor holding those secured claims was Levitin Management LLC, a real estate management company.

**Sales From Individual Number 1 to Individual Number 2  
and From Individual Number 4 to Individual Number 1**

126. Individual Number 1 sold three houses to Individual Number 2 at gains of \$15,000, \$25,000, and \$85,000. Individual Number 4 sold a house to Individual Number 1 at a gain of \$168,000. All four of those houses went into foreclosure. After foreclosure, the houses that Individual Number 4 and Individual Number 1 bought for \$200,000 - \$400,000 sold for under \$100,000.

127. For example, a two-family house located at 108 Dewitt Street, New Haven (Real Property Defendant No. 12) was sold on October 27, 2004 by an individual to Individual Number 1 for \$150,000. Less than a year later, on July 26, 2005, Individual Number 1 sold it to Individual Number 2 for \$235,000. Individual Number 2 obtained a first mortgage on that date in the amount of \$211,500 and refinanced a second mortgage a year later in the amount of \$45,300. He stopped paying all of his mortgages, and the property was foreclosed on September 19, 2008. The lender, Bank of New York, sold it on May 22, 2009 to Batia, LLC, one of Menachem Levitin's entities, for \$55,000.

128. On April 22, 2009, the amount of \$32,677.55 was wire transferred from Menachem Levitin's Wachovia Bank account number XXXXXXXXXX1666 to a bank account of the Law Firm 1 for the purchase of the property located at 108 Dewitt Street, New Haven. On April 23, 2009, the property was conveyed to Batia, LLC, by warranty deed recorded in Volume 8389, at Page 37 of the New Haven Land Records. On May 22, 2009, Batia, LLC, by Menachem Levitin, quit claimed the property to Asset Holdings, LLC, another one of Levitin's entities, for \$1.00. Also on May 22, 2009, Asset Holdings, LLC, by Individual A, conveyed the property to Shemesh, LLC by Warranty deed for \$121,000.

#### **Individual Number 4 - Purchase of Ten New Haven Houses**

129. Individual Number 4 purchased ten houses in New Haven from May 28, 2004 to May 14, 2007 at what appear to be inflated prices between \$185,000 and \$365,000. He stopped paying his mortgages starting approximately July 2007, and all ten of the houses went into foreclosure and were then sold at prices between \$34,500 and \$87,000.

130. A review of MLS records and HUD Settlement Statements suggests that the sellers of at least some of the subject properties agreed to an inflated sales price to allow the buyers to receive cash back after the closing.

131. For example, on February 13, 2006, two sellers purchased a two-family home at 270 Davenport Avenue, New Haven (Real Property Defendant No. 10) for \$105,000. After some renovations, a real estate agent listed the house on the Multiple Listing Service from May 2, 2006 to August 2, 2006 for \$224,960. They were apparently unable to find a buyer at that price, and the listing expired. However, the sellers sold the house to Individual Number 4 on December 29, 2006 for \$260,000 – more than \$35,000 above the asking price. Although they did not list this property on the Multiple Listing Service, Pinsky, Chen & Levitin received a \$12,000 commission on the sale.

132. For the 270 Davenport Avenue transaction (Real Property Defendant 10), GMAC Mortgage Corporation provided \$247,000 in mortgages based on the sales price of \$260,000. Law Firm 2<sup>3</sup> prepared a HUD-1 Settlement Statement that showed that the sellers received only \$195,126.31 from the sale. Their closing costs were \$2,950.06. The balance of the mortgage proceeds, nearly \$50,000, was apparently split among Levitin, Individual Number 4, Individual Number 1 and others. (The HUD-1 showed Individual Number 1 receiving \$5,000 from the mortgage proceeds, but it did not explain why. Bank records reflect a \$5,000 check deposited to one of Individual Number 1's accounts on January 3, 2007 with the notation "Davenport."). Three days after the closing, a check in the amount of \$19,000 drawn on the account of Law Firm 2, the closing attorney's law office, was deposited into Individual Number 4's bank account.

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<sup>3</sup>The identity of Law Firm 2 is being withheld due to the ongoing investigation.

Individual Number 4 stopped making the mortgage payments and the property was foreclosed on July 16, 2008. On September 24, 2008, the Federal National Mortgage Association (Fannie Mae) sold the property following the foreclosure for \$52,000 to Solo Investment, LLC, one of Menachem Levitin's entities.

133. On September 22, 2008, the amount of \$48,811.00 was wire transferred from Menachem Levitin's Wachovia Bank account number XXXXXXXXXX1666 to a bank account of the Law Firm 1 for the purchase of the property located at 270 Davenport Avenue, New Haven (Real Property Defendant No. 10).

134. When a property is sold at a fraudulently inflated price, the seller has to pay capital gains tax based on the inflated price. To avoid that result, a fictitious payment or credit on the HUD-1 Settlement Statement is sometimes included to write down the inflated price. Thus, for example, a repair credit of \$40,200 was included on the HUD-1 for the sale of 270 Davenport Avenue (Real Property Defendant No. 10) to Individual Number 4 on December 29, 2006, a repair credit of \$34,850 for the sale of 125 Spring Street to Individual Number 4 on December 29, 2006, a repair credit of \$28,850 for the sale of 535 East Street to Individual Number 4 on December 29, 2006, a repair credit of \$33,607 for the sale of 113 Poplar Street to Individual Number 1 on December 26, 2006, a repair credit of \$32,995 for the sale of 237 West Ivy Street to Individual Number 1 on December 26, 2006, and a repair credit of \$50,807 for the sale of 23 Townsend Street to Individual Number 1 on December 26, 2006.

**Individual Number 3- Purchase of Nine New Haven Houses**

135. Individual Number 3 purchased nine multi-family houses in New Haven from March 9, 2007 to December 7, 2007.

136. A two-family home at 273 Lloyd Street, New Haven was listed on the Multiple Listing Service from December 29, 2006 to April 2, 2007 by a real estate agent for \$219,900. The price was lowered to \$209,900, but it did not sell and the listing expired. It was later sold to Individual Number 3 on May 15, 2007, and land records indicate that the sale price was \$270,000, more than \$60,000 above an asking price that had languished on the market for four months. Individual Number 3 obtained a mortgage from Sterling Empire Funding in the amount of \$243,000. Individual Number 3 stopped making mortgage payments. On May 27, 2008, a civil action was filed in New Haven Superior Court against Individual Number 3 for foreclosure.

137. On May 8, 2009, Menachem Levitin of Prestige Realty listed 273 Lloyd Street in the Multiple Listing Service for sale at \$180,000, with the notation "Subject to bank approval for short sale."

138. There were two checks deposited into Individual Number 1's Bank of America account that indicate that he received a commission on the 273 Lloyd Street transaction. One check drawn on the account of Prestige Realty LLC, account number XXXXXXXX3556 at Bank of America, and signed by Menachem Levitin for \$5,000 had a notation in the memo section "273 Lloyd." The second check drawn on the account of Law Firm 3,<sup>4</sup> the closing attorney, for \$5,000 had a notation in the memo section "[Seller], 273 Lloyd." Seller was the previous owner who sold the property to Individual Number 3.

139. All of Individual Number 3's nine New Haven properties have gone into foreclosure.

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<sup>4</sup>The identity of Law Firm 3 is being withheld due to the ongoing criminal investigation.

**Individual Number 5 - Purchase of Seven New Haven Houses**

140. Individual Number 5 purchased seven multi-family houses in New Haven from June 12, 2007 to February 4, 2008.

141. On July 18, 2007, two sellers sold the three-family home at 64 Stevens Street, New Haven, to 64 Stevens LLC for \$161,000. 64 Stevens LLC was formed on June 14, 2007 by Menachem Levitin. On the same day, July 18, 2007, 64 Stevens Street, LLC sold the property to Individual Number 5 for \$295,000, or \$134,00 more than what it had purchased the property for. A review of Individual Number 1's Bank of America account revealed a deposited check drawn on the account of the Law Firm 1, the closing attorney's law firm, made payable to Individual Number 1 in the amount of \$10,000 with the notation "fee-64 Stevens Street."

142. Bank records reveal that checks drawn on a bank account of the Law Firm 1 were paid to 64 Stevens, LLC, M. Levitin, and Prestige Realty. Specifically, a check drawn on a bank account of the Law Firm 1 in the amount of \$71,276.48 made payable to 64 Stevens LLC or M. Levitin was deposited into Menachem Levitin's account number XXXXXXXXXX1666 at Wachovia Bank on July 18, 2007. The check memo reads, "Net Proceeds." A check in the amount of \$33,354.12 was drawn on a bank account of the Law Firm 1 in the amount of \$33,354.12 made payable to 64 Stevens, LLC was deposited into Levitin Management's account numberXXXXXXXX3716 at the Bank of America on July 30, 2007. The check memo reads, "net proceeds sale to Individual Number 5." A check drawn on a bank account of the Law Firm 1 in the amount of \$20,000 made payable to Prestige Realty was deposited into Levitin Management's account numberXXXXXXXX3716 at the Bank of America on July 30, 2007.

143. Individual Number 5 fraudulently obtained a \$206,500 mortgage loan from Wells Fargo for the property located at 64 Stevens Street, New Haven. Individual Number 5 did not disclose, however, that he had seven additional mortgage loans totaling \$1,753,900, including a \$568,200 mortgage with Mortgageit and a \$125,000 GMAC mortgage on property located at 755 Webster Avenue, New Rochelle, New York.

144. Individual Number 5 purchased seven houses in New Haven, and Individual Number 1's bank records indicate that he received some type of payment for each of them. There were two checks deposited into Individual Number 1's Bank of America account for Individual Number 5's purchase of a two-family house at 148 Lloyd Street, New Haven. Both checks were drawn on the account of the Law Firm 3 and dated June 12, 2007. The first was for \$5,000 made payable to Individual Number 1 with a notation in the memo section "Quantum Family 148." Quantum Family Partnership was the previous owner, who sold the property to Individual Number 5. The second check, in the amount of \$20,000, was made payable to Prestige Realty with a notation in the memo section "Quantum Family 148 Commission - 148 Lloyd St, New Haven." It was endorsed by Menachem Levitin and deposited into Individual Number 1's bank account.

145. All seven of Individual Number 5's New Haven properties have gone into foreclosure.

**Individual Number 6 - Purchase of Five New Haven Houses**

146. Individual Number 6 purchased five multi-family houses in New Haven from August 8, 2007 to October 22, 2007.



147. For example, a two-family house located at 151 Plymouth Street in New Haven was listed on the MLS from December 8, 2006 to May 8, 2007 for \$199,900. It was sold to Individual Number 6 on September 4, 2007 for \$245,000. A check in the amount of \$2,000 made payable to Individual Number 1 dated September 7, 2007, drawn on account numberXXXXXXXXX3556, held in the name of Prestige Realty, LLC at Bank of America with a notation "151 Plymouth," was deposited into Individual Number 1's Bank of America account.

148. Notices of foreclosures have been recorded on the New Haven Land Records in four of the five houses that Individual Number 6 purchased in New Haven. Bank records indicate that Individual Number 1 received at least \$17,000 for Individual Number 6's five transactions.

#### **Short Sales**

149. Although Levitin did not have any Multiple Listing Service contracts for the houses, he received a commission for the sale of at least fourteen houses purchased by Individual Number 1 and Individual Number 4. Individual Number 1 and Individual Number 4 stopped making their mortgage payments on each of these properties. During the foreclosure proceedings, Individual F, a real estate agent doing business as Platinum Associates, contacted GMAC Mortgage Corporation's loss mitigation department on March 25, 2008, stating that he had been authorized by Individual Number 1 to sell the below listed properties and had received an offer from Menachem Levitin for short sales on seven houses:

- (1) 517 Winchester Avenue
- (2) 289 Division Street
- (3) 21-23 Sheffield Street
- (4) 261 West Ivy
- (5) 37-39 Truman Street

- (6) 151 Saltonstall Avenue
- (7) 1536 Ella Grasso Boulevard

150. In a letter dated August 6, 2008, from Platinum Associates to GMAC, Individual F urged them to proceed with the short sale of 151 Saltonstall to Levitin before the copper pipes were stolen. In an appraisal report, dated October 8, 2008, the appraiser noted that copper pipes had been removed.

151. GMAC apparently did not allow any short sales to Levitin, but Levitin has purchased one of the foreclosed Individual Number 1/Individual Number 4 houses in his name; he purchased one in the name of Solo Investments, LLC; and his partner, Individual B, has purchased one. I interviewed the purchaser of a foreclosed house in New Haven. That individual described Levitin and said that he has been bidding on all of the foreclosures in New Haven.

152. Levitin succeeded in buying a house at 186 James Street, New Haven (Real Property Defendant No. 26) by way of a short sale. Individual Number 1 bought the house on January 5, 2007 for \$262,000, with \$220,400 in mortgages from Countywide Home Mortgage Corporation. From this sale, Levitin received a commission in the amount of \$11,450.00 which was deposited into his Prestige Realty, LLC account numberXXXXXXXXX3556 at Bank of America on January 8, 2007. Individual Number 1 stopped paying the mortgage and Countywide apparently agreed to a short sale to Menachem Levitin on or about September 17, 2008 for \$105,000. Bank records indicate that the amount of \$102,679.03 was wire transferred from Tami Research & Development's account numberXXXXXXXXX2399 at RBS Citizen's Bank to the Law Firm 1 on September 11, 2008. Also on September 11, 2008, check number 1569 drawn on account number XXXXXXXX3716 held in the name of Levitin Managment, LLC at the Bank of

America in the amount of \$10,000 was made payable to Parnosa, LLC with the notation, “purchase 186 James.” On September 15, 2008, Menachem Levitin quit claimed the property for \$1.00 to Tami Research & Development, LLC. On December 2, 2009, Tami Research & Development, LLC, by Menachem Levitin, quit claimed the property to New Haven Investment Group, LLC.

153. The mortgage file for 522 Elm Street contains correspondence from Individual F of Platinum Associates dated March 22, 2008, following Individual Number 1's default but prior to the foreclosure. The correspondence stated that Individual F had a potential buyer for the property and he was authorized by Individual Number 1 to discuss it with the lender.

154. Examination of records from the Connecticut Secretary of State and other sources indicates that Menachem Levitin has participated in the organization of a number of limited liability corporations as agent, member, or both. Many of these corporations have been involved in real estate transactions, including many of the transactions discussed in this affidavit. Those corporations include the following:

- (1) 161 Edgewood, LLC
- (2) L & I Investments, LLC
- (3) Solo Investments, LLC
- (4) Moshe, LLC
- (5) Parnosa, LLC
- (6) Tami Research and Development, LLC
- (7) Beit Aviv, LLC
- (8) Beit Aviv II, LLC
- (9) New Haven Investment Group, LLC
- (10) Shemesh, LLC
- (11) White Oak New Haven, LLC
- (12) Batia, LLC
- (13) ADM Holdings, LLC

155. Additionally, there have been a number of real estate transactions in which properties were purchased by Levitin and/or some of the above-listed corporations, and then transferred to Asset Holdings, LLC, and then re-sold to Levitin and/or some of the above-listed corporations. Records of the Connecticut Secretary of State indicate that Asset Holdings, LLC, was formed by an individual, Individual A, and lists Levitin's post office box as its mailing address. Moreover, the residential address listed for Individual A is a property owned by Levitin. Individual A is employed by Levitin Management.

156. The special agents of the FBI have interviewed a cooperating witness ("CW") in the course of this investigation. The CW has purchased one or more properties in New Haven through Levitin. Levitin told the CW that his company would take care of all aspects of real estate management, including the placement and eviction of tenants, repairs, maintenance, and rent collection. Levitin would get 10 percent of the rents as payment. Levitin told the CW that he would also find properties that the CW could buy without using any of the CW's own money

157. The CW told special agents of the FBI that although the purchase and sale agreement(s) stated that a deposit was given to the seller on the date of the agreement, no deposits were in fact made. Indeed, the CW received some money at the closings.

158. The CW did not know what the formula was that determined how much money he/she got back at the closing. Levitin would first obtain an appraisal, which would be the stated purchase price on the purchase and sale agreement. Levitin would then negotiate a lower price with the seller that would be the actual purchase price. Levitin told the CW that there would be cash back if he could work it out. Levitin handled the negotiations. The CW had little or no contact with the appraisers of the sellers.

159. The mortgage companies required copies of leases to substantiate the income from the rental property. The CW told the special agents of the FBI that only about half of the unit that the CW purchased were occupied. Levitin made fictitious leases for the unoccupied units that were submitted in support of the fraudulent mortgage applications. Levitin made fictitious leases in the CW's presence on Levitin's computer.

160. Levitin offered to pay the CW a commission for anyone the CW brought to him and purchased a house. The CW did, in fact, refer other purchasers to Levitin and received a commission on their purchases.

#### POTENTIAL MONEY LAUNDERING

161. Based on the investigation, the FBI believes that money Levitin received from approximately forty real estate transactions with Individual Number 1, Individual Number 4, Individual Number 3, Individual Number 5 and Individual Number 6, was used to purchase and renovate approximately fifty-one houses in New Haven that Levitin and other investors now own and operate as rental properties.

162. Levitin's commissions for the real estate transactions generally ranged from \$12,500.00 to \$23,625.00. Based on a review of Levitin's bank records, he may have received more than just the commissions. According to the purchase and sale agreement for the sale of 423 Blatchley Avenue from the seller to Individual Number 5, for example, Prestige Realty was supposed to receive a commission of \$20,000. An examination of Levitin Management's Bank of America bank account numberXXXXXXXXXX3716 show that Levitin deposited one check drawn on the account of the closing attorney labeled "423 Blatchley Ave" in the amount of \$9,450.00. A second check in the amount of \$30,196.83 made payable to the seller was endorsed

and deposited instead into the Levitin Management account. Those figures do not correspond to the HUD-1 Settlement Statement for the property.

163. Commission checks and other proceeds from the real estate transactions under investigation were deposited into the Prestige Realty Account and the Levitin Management account at Bank of America. The proceeds were then transferred to accounts in the name of Menachem Levitin at Citizens Bank and Wachovia Bank.

164. Levitin attempted to purchase Individual Number 1's properties at short sales during the foreclosure process, offering a fraction of the amount of Individual Number 1's mortgages. With the exception of 186 James Street (Real Property Defendant No. 26), which he purchased for \$105,000 at a short sale, the mortgage companies would not allow short sales to Levitin. Levitin began bidding on foreclosed houses in New Haven and purchased forty-one foreclosures from March 27, 2008 to February 10, 2010. The purchase prices ranged from \$23,800 to \$166,000, which were low compared to the last sales price.

165. According to the records of the Connecticut Secretary of State, Levitin formed eleven limited liability companies (LLCs) from April 2, 2008 to August 9, 2009. Another, Asset Holdings, LLC, was formed on October 14, 2008 by one of Levitin's employees, Individual A, and listed Levitin's post office box as its mailing address.

166. Levitin has transferred many of the houses he purchased from one LLC to another LLC two or three times. Levitin has transferred ten of the houses from one of his LLCs, then to Asset Holdings, LLC and back to another one of his LLCs on the same day. For example, on October 2, 2008, Solo Investment LLC, one of Levitin's limited liability companies, purchased a house at 382 Lombard Street (Real Property Defendant No. 28) in a foreclosures sale from Bank

of New York for \$166,000. It was transferred to Asset Holdings, LLC for \$1.00 on October 24, 2008. Individual A, acting on behalf on Assets Holdings, LLC, transferred it, on the same day, to Beit Aviv, LLC for \$206,000. Beit Aviv, LLC is another limited liability company controlled by Levitin.

**SOURCE OF FUNDS USED TO PURCHASE  
THE REAL PROPERTY DEFENDANTS**

167. The money Levitin used to purchase the real property defendants has been traced to the Prestige Realty, account numberXXXXXXXXX3556, and the Levitin Management, account numberXXXXXXXXX3716, at Bank of America, as well as the Menachem Levitin controlled accounts at Citizens bank and Wachovia bank.

168. The investigation revealed that the commissions Levitin received from the properties purchased at overinflated prices were deposited into Levitin's Prestige Realty account numberXXXXXXXXX3556 at Bank of America, his Levitin Management account numberXXXXXXXXX3716 at Bank of America, and account numberXXXXXXXXX1666, held in the name of Menachem Y. Levitin at Wachovia Bank. The investigation also revealed that Levitin moved the funds from those accounts to other accounts in his name or the names of his entities under his control, as well as to accounts held in the names of others for the purchase the real property defendants.

169. Levitin used accounts in his name and in the names of his entities to facilitate the fraudulent scheme. The investigation has revealed that Levitin used four accounts at the Bank of America, held in the names of L & I Investments, LLC, Levitin Management, LLC, Menachem Levitin, and Prestige Realty, LLC; six accounts at RBS Citizens Bank, held in names of

Menachem Yosef Levitin, New Haven Capital Investment, LLC, Parnosa, LLC, Shemesh, LLC, Solo Investments, LLC, and Tami Research & Development, LLC; and one account at Wachovia Bank, held in the name of Menachem Y. Levitin. Levitin used these accounts to purchase the real property defendants.

**REAL PROPERTY DEFENDANT NO. (1) 197-199 BASSETT STREET**

170. On February 1, 2010, the amount of \$57,700.00 was wire transferred from account numberXXXXXXXX5998, held in the name of New Haven Capital Investment, LLC at RBS Citizens Bank to a People's Bank account held in the name of Law Firm 1.<sup>5</sup> The wire memo indicates it is for "197 Bassett St." The New Haven Land Records indicate that on January 15, 2010, New Haven Investment Group, LLC purchased 197-199 Bassett Street for \$55,200.

**REAL PROPERTY DEFENDANT NO. (2) 25-29 BATTER STREET**

171. On June 25, 2008, check number 1482 drawn on account number XXXXXXXXXXX3716, held in the name of Levitin Management, LLC at Bank of America in the amount of \$5,000.00 was made payable to Total Realty, Inc. The New Haven Land Records indicate that on August 15, 2008, Solo Investments, LLC purchased 25-29 Batter Street for \$106,750.

**REAL PROPERTY DEFENDANT NO. (3) 81-83 BEERS STREET**

172. On May 14, 2008, check number 1456 drawn on account number XXXXXXXXXXX3716, held in the name of Levitin Management, LLC at Bank of America in the amount of \$5,000.00 was made payable to Prudential CT Realty with a memo notation, "Deposit 81-83 Beers." On June 2, 2008, check number 294 drawn on account number

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<sup>5</sup>The identity of Law Firm 1 is being withheld due to the ongoing criminal investigation.



XXXXXXXXXX1666, held in the name Menachem Y. Levitin, at Wachovia Bank in the amount of \$52,750 was made payable to Parnosa, LLC with a memo notation, "owner contribution/81 Beers." The New Haven Land Records indicate that on June 26, 2008, Menachem Levitin purchased 81-83 Beers Street for \$165,000.

**REAL PROPERTY DEFENDANT NO. (4) 501 BLATCHLEY AVENUE**

173. The special agents of the FBI have traced monies from accounts controlled by Menachem Levitin at Bank of America, RBS Citizens, and Wachovia to a bank account at People's Bank held in the name of the Law Firm 1. It is believed that the monies from the properties purchased at overinflated prices deposited into those accounts were ultimately used to purchase 501 Blatchley Avenue.

**REAL PROPERTY DEFENDANT NO. (5) 136 CARLISLE STREET**

174. On September 15, 2009, the amount of \$36,872.30 was wire transferred from account number XXXXXX3877, held in the name of Solo Investments, LLC at RBS Citizens Bank to a People's Bank account in the name of Law Firm 1. Law enforcement believe that these funds were used for the purchase of 136 Carlisle Street, or one of the other real property defendants. The New Haven Land Records indicate that on September 15, 2009, Solo Investments, LLC purchased 136 Carlisle Street for \$35,600.

**REAL PROPERTY DEFENDANT NO. (6) 561 CENTRAL AVENUE**

175. On September 29, 2008, check number 235 drawn on account number XXXXXXXXXXX1666, held in the name of Menachem Y. Levitin at Wachovia Bank in the amount of \$2,000.00 was made payable to Buyers Capital Real Estate with a memo notation,

“deposit 561 Central.” The New Haven Land Records indicate that on October 22, 2008, Menachem Levitin purchased 561 Central Avenue for \$90,000.

**REAL PROPERTY DEFENDANT NO. (7) 115 CLAY STREET**

176. On September 11, 2008, the amount of \$50,033.33 was wire transferred from account number XXXXXXXX2166, held in the name of Menachem Y. Levitin at Wachovia Bank to a People’s Bank account in the name of Law Firm 1. Law enforcement believe that these funds were used for the purchase of 115 Clay Street, or one of the other real property defendants. The New Haven Land Records indicate that on September 12, 2008, Solo Investments, LLC purchased 115 Clay Street for \$52,000.

**REAL PROPERTY DEFENDANT NO. (8) 15 COLBY COURT**

177. On November 10, 2008, the amount of \$78,000 was wire transferred from account number XXXXXX6064, held in the name of Shemesh, LLC at RBS Citizens Bank to a People’s Bank account in the name of Law Firm 1. Law enforcement believe that these funds were used for the purchase of 15 Colby Court, or one of the other real property defendants. On December 17, 2008, check number 991 drawn on account number XXXXXX7640, held in the name of New Haven Investment Group, LLC at RBS Citizens Bank in the amount of \$2,000.00 was made payable to Lavigne Mark & Rogers with a memo notation, “Deposit 15 Colby CT.” The New Haven Land Records indicate that on December 3, Solo Investments, LLC purchased 15 Colby Court for \$75,500.

**REAL PROPERTY DEFENDANT NO. (9) 141 COUNTY STREET**

178. The special agents of the FBI have traced monies from accounts controlled by Menachem Levitin at Bank of America, RBS Citizens, and Wachovia to a bank account at

People's Bank held in the name of the Law Firm 1. It is believed that the monies from the properties purchased at overinflated prices deposited into those accounts were ultimately used to purchase 141 County Street.

**REAL PROPERTY DEFENDANT NO. (10) 270 DAVENPORT AVENUE**

179. On September 4, 2008, check number 1562 drawn on account number XXXXXXXXX3716, held in the name of Levitin Management, LLC at Bank of America in the amount of \$5,200.00 was made payable to Weichert Regional Properties with a memo notation, "Deposit 270 Davenport Ave." On September 22, 2008, the amount of \$48,811 was wire transferred from account number XXXXXXXXX1666, held in the name of Menachem Y. Levitin at Wachovia Bank to a People's Bank account in the name of Law Firm 1 with the notation, "270 Davenport purchase." The New Haven Land Records indicate that on September 24, 2008, Solo Investments, LLC purchased 270 Davenport Avenue for \$52,000.

**REAL PROPERTY DEFENDANT NO. (11) 280 DAVENPORT AVENUE**

180. On August 26, 2009, check number 2062 drawn on account number XXXXXXXXX3716, held in the name of Levitin Management, LLC at Bank of America in the amount of \$714.00 was made payable to Riccio Realty. The check indicates it is for the "deposit 280 Davenport." The New Haven Land Records indicate that on August 31, 2009, Solo Investments, LLC purchased 280 Davenport Avenue for \$23,800.

181. On September 11, 2009, the amount of \$25,446.68 was wire transferred from account number XXXXXX3877, held in the name of Solo Investments, LLC at RBS Citizens Bank, to a People's Bank account in the name of Law Firm 1. The wire memo indicates it was for "280 Davenport."

**REAL PROPERTY DEFENDANT NO. (12) 108 DEWITT STREET**

182. On April 22, 2009, the amount of \$32,677.55 was wire transferred from account number XXXXXXXXXX1666, held in the name of Menachem Y. Levitin at Wachovia Bank, to a People's Bank account in the name of Law Firm 1. Law enforcement believe that these funds were used for the purchase of 108 Dewitt Street, or one of the other real property defendants. On April 23, 2009, Batia, LLC purchased 108 Dewitt Street for \$55,000.

**REAL PROPERTY DEFENDANT NO. (13) 205-207 DOVER STREET**

183. On December 17, 2008, the amount of \$84,119.96 was wire transferred from account number XXXXXX4842, held in the name of Menachem Yosef Levitin at RBS Citizens Bank to a People's Bank account held in the name of Law Firm 1. Law enforcement believe that these funds were used for the purchase of 205-207 Dover Street, or one of the other real property defendants. The New Haven Land Records indicate that on December 17, 2008, Solo Investments, LLC purchased 205-207 Dover Street for \$82,000.

**REAL PROPERTY DEFENDANT NO. (14) 161 EDGEWOOD AVENUE**

184. On July 30, 2007, check number 20 drawn on account number XXXXXXXXXX8340, held in the name of Menachem Levitin at Bank of America, in the amount of \$5,000, was made payable to Gene Fontanella Real Estate. The check indicates it is for the "deposit 161 Edgewood Ave." The New Haven Land Records indicate that on September 10, 2007, Menachem Levitin and Individual B purchased 161 Edgewood Avenue for \$315,000.

**REAL PROPERTY DEFENDANT NO. (15) 357 ELLSWORTH AVENUE**

185. On February 8, 2010, the amount of \$14,602.24 was wire transferred from account number XXXXXX3877, held in the name of Solo Investments, LLC at RBS Citizens Bank to a

People's Bank account held in the name of Law Firm 1. Law enforcement believe that these funds were used for the purchase of 357 Ellsworth Avenue, or one of the other real property defendants. The New Haven Land Records indicate that on February 10, 2010, Menachem Levitin purchased 357 Ellsworth Avenue for \$104,000.

**REAL PROPERTY DEFENDANT NO. (16) 363 ELLSWORTH AVENUE**

186. On March 25, 2009, check number 1839 drawn on account number XXXXXXXX3716, held in the name of Levitin Management, LLC at Bank of America, in the amount of \$2,000.00 was made payable to Riccio Realty. The check indicates it is for the "deposit 363 Ellsworth Ave." The New Haven Land Records indicate that on April 15, 2009, Menachem Levitin purchased 363 Ellsworth Avenue for \$86,200.

**REAL PROPERTY DEFENDANT NO. (17) 212-214 ENGLISH STREET**

\_\_\_\_\_ 187. On March 25, 2009, the amount of \$68,311.14 was wire transferred from account number XXXXXX8183, held in the name of Batia, LLC at RBS Citizens Bank to a People's Bank account held in the name of Law Firm 1. Law enforcement believe that these funds were used for the purchase of 136 Carlisle Street, or one of the other real property defendants. The New Haven Land Records indicate that on March 20, 2009, Solo Investments, LLC purchased 212-214 English Street for \$65,200.

**REAL PROPERTY DEFENDANT NO. (18) 286 EXCHANGE STREET**

\_\_\_\_\_ 188. On November 11, 2008, the amount of \$57,630.83 was wire transferred from account number XXXXXX7632, held in the name of New Haven Investment Group, LLC at RBS Citizens Bank to a People's Bank account held in the name of Law Firm 1. Law enforcement believe that these funds were used for the purchase of 286 Exchange Street, or one

of the other real property defendants. The New Haven Land Records indicate that on December 12, 2008, White Oak New Haven, LLC purchased 286 Exchange Street for \$104,000.

**REAL PROPERTY DEFENDANT NO. (19) 299 GREENWICH STREET**

189. On November 18, 2009, the amount of \$34,000 was wire transferred from account number XXXXXX6787, held in the name of Parnosa, LLC at RBS Citizens Bank to a People's Bank account held in the name of Law Firm 1. Law enforcement believe that these funds were used for the purchase of 299 Greenwich Street, or one of the other real property defendants. The New Haven Land Records indicate that on November 23, 2009, Moshe purchased 299 Greenwich Street for \$30,200.

**REAL PROPERTY DEFENDANT NO. (20) 222 HALLOCK AVENUE**

\_\_\_\_\_190. The special agents of the FBI have traced monies from accounts controlled by Menachem Levitin at Bank of America, RBS Citizens, and Wachovia to a bank account at People's Bank held in the name of the Law Firm 1. It is believed that the monies from the properties purchased at overinflated prices deposited into those accounts were ultimately used to purchase 222 Hallock Avenue.

**REAL PROPERTY DEFENDANT NO. (21) 89 HAZEL STREET**

\_\_\_\_\_191. On February 1, 2010, the amount of \$57,700 was wire transferred from account number XXXXXX5998, held in the name of New Haven Capital Investment, LLC at RBS Citizens Bank to a People's Bank account held in the name of Law Firm 1. Law enforcement believe that these funds were used for the purchase of 89 Hazel Street, or one of the other real property defendants. The New Haven Land Records indicate that on February 9, 2010, Solo Investments, LLC purchased 89 Hazel Street for \$27,100.

**REAL PROPERTY DEFENDANT NO. (22) 314 HOWARD AVENUE**

192. Check number 2407 drawn on account number XXXXXXXX3556, held in the name of Prestige Realty, LLC at Bank of America, in the amount of \$2,000.00 was made payable to Buyers Captial with a memo notation, "Deposit for 314 Howard." On October 31, 2008, the amount of \$122,891.44 was wire transferred from account number XXXXXX6064, held in the name of Shemesh, LLC at RBS Citizens Bank to a People's Bank account held in the name of Law Firm 1. Law enforcement believe that these funds were used for the purchase of 314 Howard Avenue, or one of the other real property defendants. The New Haven Land Records indicate that on November 4, 2008, Solo Investments purchased 314 Howard Haven for \$120,000.

**REAL PROPERTY DEFENDANT NO. (23) 490 HOWARD AVENUE**

193. On January 15, 2010, the amount of \$47,958.57 was wire transferred from account number XXXXXX5998, held in the name of New Haven Capital Investment, LLC at RBS Citizens Bank to a People's Bank account held in the name of Law Firm 1. The wire memo indicates it is for "490 Howard." The New Haven Land Records indicate that on January 5, 2010, New Haven Investment Group, LLC purchased 490 Howard Avenue for \$45,000.

**REAL PROPERTY DEFENDANT NO. (24) 456 HUNTINGTON STREET**

194. On January 26, 2010, the amount of \$30,578.69 was wire transferred from account number XXXXXX5998, held in the name of New Haven Capital Investment, LLC at RBS Citizens Bank to a People's Bank account held in the name of Law Firm 1. The wire memo indicates it is for "Huntington St." The New Haven Land Records indicate that on January 15, 2010, Solo Investment Group, LLC purchased 456 Huntington Streetfor \$28,000.

**REAL PROPERTY DEFENDANT NO. (25) 88-89 HURLBURT STREET**

\_\_\_\_\_195. The special agents of the FBI have traced monies from accounts controlled by Menachem Levitin at Bank of America, RBS Citizens, and Wachovia to a bank account at People's Bank held in the name of the Law Firm 1. It is believed that the monies from the properties purchased at overinflated prices deposited into those accounts were ultimately used to purchase 88-89 Hurlburt Street.

**REAL PROPERTY DEFENDANT NO. (26) 186 JAMES STREET**

196. On September 11, 2008, check number 1569 drawn on account number XXXXXXXX3716, held in the name of Levitin Management, LLC at Bank of America in the amount of \$10,000.00 was made payable to Parnosa, LLC. The check indicates it is for the "purchase 186 James Street." Also on September 11, 2008, the amount of \$102,679.03 was wire transferred from account number XXXXXX2399, held in the name of Tami Research & Development, LLC (one of Levitin's entities) at RBS Citizens Bank, to a People's Bank account held in the name of Law Firm 1. Law enforcement believe that these funds were used for the purchase of 186 James Street, or one of the other real property defendants. The New Haven Land Records indicate that on September 17, 2008, Menachem Levitin purchased 186 James Street for \$105,000.

**REAL PROPERTY DEFENDANT NO. (27) 265 JAMES STREET**

197. On March 18, 2008, check number 1401 drawn on account number XXXXXXXX3716, held in the name of Levitin Management, LLC (one of Levitin's entities) at Bank of America in the amount of \$5,000.00 was made payable to Law Firm 1. The check indicates it is for "deposit 265 James Street." On April 3, 2008, check number 1407 drawn on



account number XXXXXXXXX3716, held in the name of Levitin Management, LLC at Bank of America, in the amount of \$29,798.52, was made payable to Law Firm 1. The check indicates it is for “closing 265 James Street.” The New Haven Land Records indicate that on March 27, 2008, Menachem Levitin purchased 265 James Street for \$95,000.

**REAL PROPERTY DEFENDANT NO. (28) 382 LOMBARD STREET**

198. On October 23, 2008, check number 85 drawn on account number XXXXXXXXX4671, held in the name of L & I Investments, LLC at Bank of America, in the amount of \$11,144.30, was made payable to Law Firm 1. The check indicates it is for the “closing of 382 Lombard Street.” The New Haven Land Records indicate that on October 2, 2008, Solo Investments, LLC (one of Levitin’s entities) purchased 382 Lombard Street for \$166,600.00.

**REAL PROPERTY DEFENDANT NO. (29) 19-21 NORTON STREET**

199. On July 28, 2008, check number 47 drawn on account number XXXXXXXXX4671, held in the name of L & I Investments, LLC at Bank of America, in the amount of \$15,842.50, was made payable to Parnosa, LLC (one of Levitin’s entities). The check indicates it is for the “Purchase of 19-21 Norton Street.” On July 28, 2008, check number 307 drawn on account number XXXXXXXXXX1666, held in the name of Menachem Y. Levitin, at Bank of America, in the amount of \$28,437.50, was made payable to Parnosa, LLC. The check indicates it is for the “purchase of 19 Norton Street.” On August 12, 2008, the amount of \$78,080.34 was wire transferred from account number XXXXXX6787, held in the name of Parnosa, LLC at RBS Citizens Bank, to a People’s Bank account held in the name of Law Firm 1. Law enforcement believe that these funds were used for the purchase of 19-21 Norton Street,

or one of the other real property defendants. The New Haven Land Records indicate that on August 8, 2008, Parnosa, LLC purchased 19-21 Norton Street for \$75,000.

**REAL PROPERTY DEFENDANT NO. (30) 279-281 NORTON STREET**

200. On January 7, 2010, the amount of \$122,272.84 was wire transferred from account number XXXXXX5998, held in the name of New Haven Capital Investment, LLC at RBS Citizens Bank to a People's Bank account held in the name of Law Firm 1. Law enforcement believe that these funds were used for the purchase of 279-281 Norton Street, or one of the other real property defendants. The New Haven Land Records indicate that on October 5, 2009, 279-281 Norton Street was purchased by Solo Investments, LLC for \$112,000.

**REAL PROPERTY DEFENDANT NO. (31) 353 ORCHARD STREET**

201. On February 23, 2009, check number 149 drawn on account number XXXXXXXX94671, held in the name of L & I Investments, LLC at Bank of America, in the amount of \$60,900.67, was made payable to Law Firm 1. Law enforcement believe this check was for the purchase of 353 Orchard Street. The New Haven Land Records indicate that on February 24, 2009, L & I Investments, LLC purchased 353 Orchard Street for \$66,200.

**REAL PROPERTY DEFENDANT NO. (32) 378-380 ORCHARD STREET**

202. On September 30, 2009, the amount of \$98,099.80 was wire transferred from account number XXXXXX3877, held in the name of Solo Investments, LLC at RBS Citizens Bank to a People's Bank account in the name of Law Firm 1. The wire memo indicates it was for "378 Orchard St." The New Haven Land Records indicate that on September 23, 2009, Solo Investments, LLC purchased 378-380 Orchard Street for \$97,000.

**REAL PROPERTY DEFENDANT NO. (33) 95 PARDEE STREET**

203. On July 15, 2009, the amount of \$44,900.22 was wire transferred from account numberXXXXXXXX3877, held in the name of Solo Investments, LLC at RBS Citizens Bank to a People's Bank account held in the name of Law Firm 1. Law enforcement believe that these funds were used for the purchase of 95 Pardee Street, or one of the other real property defendants. The New Haven Land Records indicate that on July 9, 2009, Solo Investments, LLC purchased 95 Pardee Street for \$43,300.

**REAL PROPERTY DEFENDANT NO. (34) 122-124 PLYMOUTH STREET**

204. On March 10, 2008, check number 1386 drawn on account number XXXXXXXX3716, held in the name of Levitin Management, LLC at Bank of America in the amount of \$10,000.00 was made payable to William Raveis Trustee with memo notation, "deposit 122-124 Plymouth New Haven." The New Haven Land Records indicate that on April 3, 2008, Menachem Levitin purchased 122-124 Plymouth Street for \$165,000.

**REAL PROPERTY DEFENDANT NO. (35) 97-99 ROCK CREEK ROAD**

205. On May 22, 2009, the amount of \$82,666.33 was wire transferred from account number XXXXXX6064, held in the name of Shemesh, LLC at RBS Citizens Bank to a People's Bank account held in the name of Law Firm 1. Law enforcement believe that these funds were used for the purchase of 97-99 Rock Creek Road, or one of the other real property defendants. The New Haven Land Records indicate that on May 22, 2009, Asset Holdings, LLC purchased 97-99 Rock Creek Road for \$80,300.

**REAL PROPERTY DEFENDANT NO. (36) 41 SHEFFIELD AVENUE**

206. On February 10, 2010, the amount of \$50,590 was wire transferred from account number XXXXXX3877, held in the name of Solo Investments, LLC at RBS Citizens Bank to a People's Bank account held in the name of Law Firm 1 with a memo notation, "41 Sheffield. The New Haven Land Records indicate that on February 8, 2010, Solo Investments, LLC purchased 41 Sheffield Avenue for \$45,000.

**REAL PROPERTY DEFENDANT NO. (37) 8 SHELTER STREET**

207. The special agents of the FBI have traced monies from accounts controlled by Menachem Levitin at Bank of America, RBS Citizens, and Wachovia to a bank account at People's Bank held in the name of the Law Firm 1. It is believed that the monies from the properties purchased at overinflated prices deposited into those accounts were ultimately used to purchase 8 Shelter Street.

**REAL PROPERTY DEFENDANT NO. (38) 37-39 SHELTER STREET**

208. On August 10, 2009, the amount of \$65,724.10 was wire transferred from account number XXXXXX6787, held in the name of Parnosa, LLC at RBS Citizens Bank to a People's Bank account held in the name of Law Firm 1. Law enforcement believe that these funds were used for the purchase of 37-39 Shelter Street, or one of the other real property defendants. The New Haven Land Records indicate that on August 20, 2009, Solo Investments, LLC purchased 37-39 Shelter Street for \$10.00 (transfer tax of \$324.50 indicates a purchase price of \$64,900).

**REAL PROPERTY DEFENDANT NO. (39) 140 SHELTON AVENUE**

209. On December 17, 2008, the amount of \$84,119.96 was wire transferred from account number XXXXXX4842, held in the name of Menachem Yosef Levitin at RBS Citizens

Bank to a People's Bank account held in the name of Law Firm 1. Law enforcement believe that these funds were used for the purchase of 140 Shelton Avenue, or one of the other real property defendants. The New Haven Land Records indicate that on December 19, 2008, L & I Investments, LLC purchased 140 Shelton Avenue for \$90,500.

**REAL PROPERTY DEFENDANT NO. (40) 418 SHELTON AVENUE**

210. On June 30, 2009, the amount of \$64,906.47 was wire transferred from account number XXXXXX6787, held in the name of Parnosa, LLC at RBS Citizens Bank to a People's Bank account held in the name of Law Firm 1. The wire memo indicates it is for "418 Shelton." The New Haven Land Records indicate that on June 29, 2009, Solo Investments, LLC purchased 418 Shelton Avenue for \$57,200.00.

**REAL PROPERTY DEFENDANT NO. (41) 334-336 SHERMAN AVENUE**

211. The special agents of the FBI have traced monies from accounts controlled by Menachem Levitin at Bank of America, RBS Citizens, and Wachovia to a bank account at People's Bank held in the name of the Law Firm 1. It is believed that the monies from the properties purchased at overinflated prices deposited into those accounts were ultimately used to purchase 334-336 Sherman Avenue.

**REAL PROPERTY DEFENDANT NO. (42) 342 SHERMAN AVENUE**

212. On July 8, 2009, the amount of \$141,380.47 was wire transferred from account number XXXXXX6787, held in the name of Parnosa, LLC at RBS Citizens Bank to a People's Bank account held in the name of Law Firm 1. The wire memo indicates it is for "342 Sherman." The New Haven Land Records indicate that on June 23, 2009, Asset Holdings, LLC purchased 342 Sherman Avenue for \$30,000.00.

**REAL PROPERTY DEFENDANT NO. (43) 55-57 THOMPSON STREET**

213. On May 7, 2009, the amount of \$104,375.39 was wire transferred from account number XXXXXX6064, held in the name of Shemesh, LLC at RBS Citizens Bank to a People's Bank account held in the name of Law Firm 1. Law enforcement believe that these funds were used for the purchase of 55-57 Thompson Street, or one of the other real property defendants. The New Haven Land Records indicate that on April 24, 2009, Asset Holdings, LLC purchased 55-57 Thompson Street for \$208,000.

**REAL PROPERTY DEFENDANT NO. (44) 443 VALLEY STREET**

214. On September 8, 2008, the amount of \$32,490.28 was wire transferred from account number XXXXXX6787, held in the name of Parnosa, LLC at RBS Citizens Bank, to a People's Bank account held in the name of Law Firm 1. The wire memo indicates it is for "443 Valley Street." The New Haven Land Records indicate that on August 26, 2008, Solo Investments, LLC purchased 443 Valley Street for \$30,000.00.

**REAL PROPERTY DEFENDANT NO. (45) 56-58 VICTORY DRIVE**

215. The special agents of the FBI have traced monies from accounts controlled by Menachem Levitin at Bank of America, RBS Citizens, and Wachovia to a bank account at People's Bank held in the name of the Law Firm 1. It is believed that the monies from the properties purchased at overinflated prices deposited into those accounts were ultimately used to purchase 56-58 Victory Drive.

**REAL PROPERTY DEFENDANT NO. (46) 159 WEST STREET**

216. On January 7, 2010, the amount of \$122,272.84 was wire transferred from account number XXXXXX5998, held in the name of New Haven Capital Investment, LLC at

RBS Citizens Bank to a People's Bank account held in the name of Law Firm 1. The wire memo indicates it is for "Sherman and West." The New Haven Land Records indicate that on January 6, 2010, New Haven Investment Group, LLC purchased 159 West Street for \$10.00 and other valuable consideration (tax stamps of \$130.00 indicate a purchase price of \$26,000).

**REAL PROPERTY DEFENDANT NO. (47) 579-581 WHALLEY AVENUE**

217. On June 18, 2008, check number 30 drawn on account number XXXXXXXX4671, held in the name of L & I Investments, LLC at Bank of America, in the amount of \$175,000, was made payable to Law Firm 1. The check indicates it is for the "purchase of 579-581 Whalley Ave." The New Haven Land Records indicate that on June 20, 2008, L & I Investments, LLC purchased 579-581 Whalley Avenue for \$173,00.

**REAL PROPERTY DEFENDANT NO. (48) 583-585 WINCHESTER AVENUE**

218. On February 19, 2009, check number 99 drawn on account number XXXXXX6064, held in the name of Shemesh, LLC at RBS Citizens Bank, the amount of \$42,508.79 was made payable Law Firm 1, with a memo notation, "Purchase 585 Winchester." Check number 172 drawn on account number XXXXXXXX4671, held in the name of L & I Investments, LLC at Bank of America, the amount of \$2,851 was made payable Law Firm 1, with a memo notation, "585 Winchester." The New Haven Land Records indicate that on March 4, 2009, New Haven Investment, LLC purchased 583-585 Winchester Avenue for \$41,900.

**REAL PROPERTY DEFENDANT NO. (49) 872-874 WINCHESTER AVENUE**

219. On May 5, 2009, the amount of \$54,744.41 was wire transferred from account number XXXXXX3877, held in the name of Solo Investments, LLC at RBS Citizens Bank to a People's Bank account held in the name of Law Firm 1. Law enforcement believe that these

funds were used for the purchase of 872-874 Winchester Avenue, or one of the other real property defendants. On February 9, 2009, check number 1746 drawn on account number XXXXXXXX3716, held in the name of Levitin Management, LLC at Bank of America in the amount of \$2,000.00 was made payable to Sette Real Estate with memo notation, "Deposit 872 Winchester." The New Haven Land Records indicate that on May 1, 2009, Solo Investments, LLC purchased 872-874 Winchester Avenue for \$51,000.

**REAL PROPERTY DEFENDANT NO. (50) 510 WINTHROP AVENUE**

\_\_\_\_\_220. On May 5, 2009, the amount of \$54,744.41 was wire transferred from account number XXXXXX3877, held in the name of Solo Investments, LLC at RBS Citizens Bank to a People's Bank account held in the name of Law Firm 1. Law enforcement believe that these funds were used for the purchase of 510 Winthrop Avenue, or one of the other real property defendants. The New Haven Land Records indicate that on May 1, 2009, Solo Investments, LLC purchased 510 Winthrop Avenue for \$59,900.

**REAL PROPERTY DEFENDANT NO. (51) 573 WINTHROP AVENUE**

221. November 6, 2008, the amount of \$117,764.10 was wire transferred from account number XXXXXX7139, held in the name of Beit Aviv, LLC at RBS Citizens Bank to a People's Bank account held in the name of Law Firm 1. Law enforcement believe that these funds were used for the purchase of 573 Winthrop Avenue, or one of the other real property defendants. The New Haven Land Records indicate that on December 16, 2008, New Haven Investment Group, LLC purchased 573 Winthrop Avenue for \$114,000.



### **CONCLUSION**

222. The Real Property Defendants were involved in a transaction or attempted transaction, or traceable thereto, in violation of 18 U.S.C. §§ 1956 and 1957, or represent property which constitutes or is derived from proceeds traceable to a violation of 18 U.S.C. § 1343, and are therefore subject to forfeiture pursuant to 18 U.S.C. § 981(a)(1)(A); or that they constitute or are derived from proceeds traceable to an offense constituting “specified unlawful activity” (as defined in 18 U.S.C. § 1956(c)(7)), namely wire fraud in violation of 18 U.S.C. § 1343, and are therefore subject to forfeiture pursuant to 18 U.S.C. § 981(a)(1)(C).

WHEREFORE, the United States of America respectfully asserts that there is reasonable belief that the 51 Real Property Defendants are subject to forfeiture to the United States pursuant to 18 U.S.C. §§ 981(a)(1)(A) or (C); and requests

(a) that pursuant to 18 U.S.C. § 985(b)(2), and 18 U.S.C. § 981(j), which permits the Court to “take any action to . . . preserve the availability of the property subject to civil forfeiture,” the Court issue the proposed Writs of Entry submitted with this Verified Complaint of Forfeiture authorizing the United States Marshals Service, or its delegate, to enter the 51 Real Property Defendants, including any structures, on one or more occasions during the pendency of this in rem forfeiture action:

- (1) for the purpose of conducting an inspection and inventory and appraisal of the 51 Real Property Defendants, which inspection and inventory and appraisal may include still and video photography;

- (2) to be accompanied on any such occasion by any appraiser(s) selected by it to appraise the condition and value of the 51 Real Property Defendants pursuant to 19 U.S.C. § 1606;
- (3) to be accompanied on any such occasion by any government or contract personnel selected by it for the purpose of conducting an inventory of the 51 Real Property Defendants; and
- (4) to be accompanied on any such occasion by any federal, state, or local law enforcement officers selected by it to ensure the safety of any person acting under the Writs of Entry.

(b) that the Court decree that the forfeiture of the 51 Real Property Defendants to the United States under 18 U.S.C. §§ 981(a)(1)(A) or (C) is confirmed, enforced, and ordered;

(c) that the Court thereafter order that the United States Marshal, or his delegate, dispose of the 51 Real Property Defendants as provided by law; and

(d) that the Court award Plaintiff United States all other relief to which it is entitled, including the costs of this action.

Respectfully submitted,

DAVID B. FEIN  
UNITED STATES ATTORNEY

/s/ John B. Hughes  
JOHN B. HUGHES  
CHIEF, CIVIL DIVISION  
ASSISTANT U. S. ATTORNEY

/s/ Julie G. Turbert  
JULIE G. TURBERT  
ASSISTANT U.S. ATTORNEY  
ATTORNEY BAR # ct23398  
157 CHURCH STREET  
NEW HAVEN, CT 06510  
TELEPHONE: (203) 821-3700  
FAX: (203) 773-5373  
EMAIL: Julie.Turbert@usdoj.gov

DECLARATION

I am a Special Agent of the Federal Bureau of Investigation, United States Department of Justice, and the agent assigned the responsibility for this case.

I have read the contents of the foregoing Verified Complaint of Forfeiture and the statements contained therein are true to the best of my knowledge and belief.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 18<sup>th</sup> day of May 2010.

/s/ Claudia A. Mannix

CLAUDIA A. MANNIX  
SPECIAL AGENT  
FEDERAL BUREAU OF INVESTIGATION

REAL PROPERTY DEFENDANT NO. (1) 197-199 BASSETT STREET

All that certain piece or parcel of land, with the buildings thereon, situated in the Town of New Haven, County of New Haven and State of Connecticut, bounded and described as follows:

- NORTHERLY: By Bassett Street, 31 feet, more or less;
- EASTERLY: By land now or formerly of Henry Munson, 91 feet, more or less;
- SOUTHERLY: By land now or formerly of Frank P. Pilegher, 31 feet, more or less;
- Westerly: By land now or formerly of William M. Morrow, 91 feet, more or less. -

REAL PROPERTY DEFENDANT NO. (2) 25-29 BATTER TERRACE

A certain piece or parcel of land together, with the buildings and improvements thereon, situated in the Town of New Haven, County of New Haven, and the State of Connecticut, known as #25-29 Batter Terrace, and bounded: WEST: By the Easterly line of Batter Terrace, 40 feet, more or less; NORTH: By land now or formerly of Morris Batter, 70 feet, more or less, by a straight line drawn, parallel and perpendicularly distance North 320 feet from the North line of George Street; EAST: By land now or formerly of Michael and Mary A. Sullivan, 27 feet, more or less; NORTH again; In part by land now or formerly of Michael and Mary A. Sullivan and in part by land now or formerly of Edward and Mary O' Meara, 80 feet, more or less; EAST again; By land now or formerly of Sila, P. Snow, 21 feet; SOUTH: By land now or formerly of Philip J. Hasselbach 50 feet, by a straight line drawn parallel with and perpendicularly distance North 270 feet from the North line of George Street; SOUTHWEST: By land now or formerly of Philip J. Hasselbach, 14-14/100 feet, by a straight line making an angle of 135 degrees with said last mentioned Southerly line which measured from the Batter through the North toward the West; and SOUTH: again: By land now or formerly of Philip J. Hasselbach, 81 feet, 7 inches, more or less by a straight line drawn parallel with and perpendicularly distance South 40 feet, from the first herein described Northerly line.



**REAL PROPERTY DEED DEDICANT NO. (3) 81-83 BEERS STREET**

A certain piece or parcel of land, ~~located in the City of New Haven, State of Connecticut, bounded by Beers Street, 40 feet~~  
 Street:

WESTERLY: by Beers Street, 40 feet;

NORTHERLY: by land now or formerly of Angeline Ciccato, by a line drawn at right angles to the Westerly line of Beers Street, and running Easterly therefrom a distance of 106.5 feet and thence southerly at an angle of 170 degrees, when measured back the line through the block to the West, and running 22.50 feet, more or less, in a straight line to land of owners unknown;

EASTERLY: by land of owners unknown, and land now or formerly of Michael Brennan, 42.15 feet, more or less;

SOUTHERLY: by land now or formerly of Henry H. Bannell, 136 feet, more or less.

Together with now as shown in a ~~map~~ **DEED DEDICANT NO. (4) 501 PLATCHLEY AVENUE** recorded to James E. Ellis and ~~others~~ in Volume 1406 at Page 406 of ~~the~~ **DEED DEDICANT NO. (4) 501 PLATCHLEY AVENUE**

**REAL PROPERTY DEED DEDICANT NO. (4) 501 PLATCHLEY AVENUE**

All that  
 situated  
 in the City of New Haven, State of Connecticut, bounded by Beers Street, 40 feet;

WESTERLY: by Beers Street, 40 feet;

SOUTHERLY: by land now or formerly of ~~Michael Brennan~~ **Michael Brennan**, 42.15 feet, more or less;

SOUTHERLY: by land now or formerly of ~~Henry H. Bannell~~ **Henry H. Bannell**, 136 feet, more or less;

NORTHERLY: by land now or formerly of ~~Angeline Ciccato~~ **Angeline Ciccato**, by a line drawn at right angles to the Westerly line of Beers Street, and running Easterly therefrom a distance of 106.5 feet and thence southerly at an angle of 170 degrees, when measured back the line through the block to the West, and running 22.50 feet, more or less, in a straight line to land of owners unknown;

REAL PROPERTY DEFENDANT NO. (5) 136 CARLISLE STREET

ALL THAT CERTAIN piece of land, with all the buildings and other improvements, situated in the City of New Haven and County of Connecticut, known as 136 Carlisle Street, and bounded as follows:

- Westerly: by Carlisle Street, 35 feet, more or less;
- Easterly: by land now or formerly of Mary A. Lathrop, 98 feet, more or less;
- Northerly: in part by land now or formerly of Edward P. Smith, and in part by land now or formerly of William B. O'Brien, in all, 35 Feet, more or less;
- Southerly: by land now or formerly of Patrick Croghan, 98 feet, more or less.

SUBJECT TO:

Any and all provisions of the municipal ordinance or regulations, and any Federal, State or local public or private law, with special reference to the provisions of any zoning ordinance or regulations governing the subject premises.

Real estate taxes to the City of New Haven due and payable.

Any assessment or public improvement of which a lien or liens have not as yet been filed or recorded in the Town Clerk's office.

Subject to the provisions, if any, of any inland wetland or coastal wetlands, status, easements, rules and regulations.

Water use fees are hereby due and payable to the South Central Connecticut Regional Water Authority.

Sanitary use fees are hereby due and payable to the Water Pollution Control Authority for the City of New Haven.

REAL PROPERTY DEFENDANT NO. 60 561 CENTRAL AVENUE

All that certain piece or parcel of land, with the buildings and all other improvements thereon, situate, lying and being in the Town of New Haven, County of New Haven and State of Connecticut, known as 561 Central Avenue, bounded and described as follows:

**WEST:** by Central Avenue, 50 feet, 3-1/2 inches, more or less;

**SOUTH:** by land now or formerly of United States, 40 feet, more or less, by a straight line parallel to the street northerly from the northerly line of said lot, and running along the easterly line of Central Avenue;

**EAST:** by land now or formerly of William P. Daff, 40 feet, more or less;

SOUTH: again, in part by land now or formerly of William P. Duff, and in part by land formerly of John Duff, in all, 70 feet, more or less, said southerly line with a westerly line;

**NOTE:** by land now or formerly of Camp A. Greenberg, 150 feet.

**REAL PROPERTY RETURN NO. (7) 115 CLAY STREET**

**ALL INFORMATION CONTAINED HEREIN IS UNCLASSIFIED**

**906744: BY CLAY SHAW, AND OTHERS.**

EAST: [REDACTED] 173 FEET.

NOTE: BY LARSEN CONSULTING, INC. (LCS), BOSTON, MASSACHUSETTS, AND

WEST: BY ANDREW G. GREGORY, ATTORNEY AT LAW, MOBILE, ALABAMA.

**REAL PROPERTY DEFENDANT NO. (S) 15 COLBY COURT**

All that certain parcel of land with ~~2,700~~ <sup>2,700</sup> ~~square~~ <sup>square</sup> ~~feet~~ <sup>feet</sup> ~~more or less~~ <sup>more or less</sup> thereon, situated in the Town of New Haven, ~~City of New Haven~~ <sup>County of New Haven</sup> State of Connecticut, known as 15 Colby Court, and bounded:

WEST: by Colby Court, formerly known as Doris Anne Lane, 150 feet;

NORTH: by land now or formerly of Police Canada, 74 feet, more or less, by a straight line;

EAST: by land now or formerly of William E. Perry, 145 feet;

SOUTH: by land now or formerly of Holmes Catania, 38 feet, more or less, by a  
straight line.



by George Spaul, 26 feet;  
by East Mt. 26 to 135 feet;  
by [redacted] of Louisa E. Howland, 35 feet;  
by [redacted] of [redacted], 135 feet.

WESTERLY: by County Street, 3 feet, 3 inches;  
SOUTHERLY: by the southerly line of Lot #10, land now or formerly of  
Louis Finkler, 150 feet more or less;  
EASTERLY: by land now or formerly of Louise E. Howardsfield, 9 feet, 3  
inches;  
NORTHERLY: by the northerly line of Lot #10, now or formerly of  
Louis Finkler, 150 feet more or less.

**REAL PROPERTY DEFENDANT NO. (10) 270 DAVENPORT AVENUE**

All that certain piece or parcel of land, together with all improvements thereon, situated in the Town of New Haven, Connecticut, and known as #270 Davenport Avenue, bounded and described as follows:

**NORTHERLY:** by Davenport Avenue, 25 feet, more or less;  
**WESTERLY:** by landline or boundary of lot 125 feet, more or less;  
**SOUTHERLY:** by landline or boundary of the lot of Ann Gibson, situated, 25 feet, more or less;  
**EASTERLY:** by lot: the property of Sylvia B. Eisenberg, Trustee, known as 1268 Davenport Avenue, 125 feet, more or less.

Together with the use of a strip of land from the Easterly side of premises known as #268 Davenport Avenue, bounded:

**NORTHERLY:** by Davenport Avenue, 2 feet, 3 inches;  
**EASTERLY:** by the landline or boundary of the lot described in a deed from Abraham F. Schofield and Ann A. Schofield, their heirs and assigns, to be known as #268 Davenport Avenue, 75 feet;  
**SOUTHERLY:** by the landline or boundary of the lot described in a deed from Sylvia B. Eisenberg, Trustee to Janet N. Young, known as #268 Davenport Avenue, 75 feet;  
**WESTERLY:** by the landline or boundary of the lot described in a deed from Sylvia B. Eisenberg, Trustee to Janet N. Young, known as #268 Davenport Avenue, 75 feet;

and a ten foot strip of Way for all purposes whatsoever, over the southern 25 feet of the lot described in a deed from Sylvia B. Eisenberg to Janet N. Young, known as #268 Davenport Avenue, including and including, over the strip of Way, and subject to the adjacent property known as #268 Davenport Avenue.

Together with any right the Grantee herein may have to passway to the Grantee herein; her interest in and to the strip of Way over the lot described in the deed from Sylvia B. Eisenberg to Janet N. Young and described in a deed from Sylvia B. Eisenberg, Trustee to Janet N. Young and bounded:

**NORTHERLY:** by Davenport Avenue, 4 feet, 5 inches;  
**WESTERLY:** by the landline or boundary of the lot described in a deed from Sylvia B. Eisenberg, Trustee to Janet N. Young, 75 feet;  
**SOUTHERLY:** by now in boundary of the lot of Ann Gibson and Ann M. Schofield, 4 feet, 6 inches;  
**EASTERLY:** by lot: the property of Sylvia B. Eisenberg, Trustee, known as 1268 Davenport Avenue, 125 feet.

REAL PROPERTY DEFENDANT NO. (11) 200 DAVENPORT AVENUE

ALL that certain lot or lots of land, together with all improvements thereon, situated in the City of New Haven and State of Connecticut, known as 200 Davenport Avenue, being more particularly described as follows:

NORTH: by Irvington Avenue, 25 feet, more or less;  
EAST: by land now or formerly of Mary E. O'Sullivan, 150 feet, more or less;  
SOUTH: by land now or formerly of Mary E. O'Sullivan, 25 feet, more or less;  
WEST: by land now or formerly of Michael N. Sullivan, 150 feet, more or less.

REAL PROPERTY DEFENDANT NO. (12) 100 DEWITT STREET

All that certain lot or lots of land, together with all improvements thereon, situated in the City of New Haven and State of Connecticut, known as 100 DeWitt Street, being more particularly described as follows:

EASTERLY: by DeWitt Street, 27-1/2 feet, more or less;  
NORTHERLY: by land now or formerly of Edward P. Gray, 100 feet;  
WESTERLY: by land now or formerly of William W. Miller, 27-1/2 feet, more or less;  
SOUTHERLY: by land now or formerly of William W. Miller, 100 feet.

REAL PROPERTY DEFENDANT NO. (13) 205-207 DOVER STREET

All that certain lot or lots of land, together with all improvements thereon, situated in the City of New Haven and State of Connecticut, known as 205-207 Dover Street, being more particularly described as follows:

SOUTH: by Dover Street, 35 feet, more or less;  
EAST: by land now or formerly of Abraham Stone, 115 feet, more or less;  
NORTH: by land now or formerly of Albert Goldmann, 35 feet, more or less;  
WEST: by land now or formerly of Frederick M. Ward Co., Trustee, 115 feet, more or less.

Less and excepting therefrom: All that certain real property as more particularly set forth in a Certificate of Title in favor of the City of New Haven dated August 7, 1962 and recorded in Volume 100 of the City of New Haven Land Records dated June 1, 1963 and recorded in Volume 100 of the City of New Haven Land Records.

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**1992**

REAL PROPERTY DEFENDANT NO. (15) 357 ELLSWORTH AVENUE

**FORWARDED:** By First class registered mail to Hon. J. C. McGowan and Eugene S. Gardner,

REAL PROPERTY DEPARTMENT NO. 19262 HILLSWORTH AVENUE

**SOUTH:** By first boundary of District No. 2, more fully defined, thence 179 1/4 feet, more or less

[REDACTED]

\_\_\_\_\_

**REMARKS:** by hand saw on stump of stump, 1-12 inches.

REAL PROPERTY BOUNDARY AND CORNER HALLOCK AVENUE

All that [REDACTED] of New  
[REDACTED] known as

EAST: by Hallock Avenue, 33-1/3 feet, more or less;  
NORTH: by Second Street, 100 feet, more or less;  
WEST: by land now or formerly of John P. Ahern, 33-1/3 feet, more or less;  
SOUTH: by [REDACTED] for [REDACTED] or [REDACTED]

REAL PROPERTY BOUNDARY AND CORNER HAZEL STREET

All that certain piece of [REDACTED] situated in the City of [REDACTED] State of Connecticut, known as [REDACTED]

SOUTHERLY: By [REDACTED] 30 feet  
WESTERLY: By land now or formerly of Thomas Phillips, 149 feet, more or less;  
NORTHERLY: By land now or formerly of [REDACTED] 30 feet  
EASTERLY: By land now or formerly of [REDACTED] 149 feet, more or less

REAL PROPERTY BOUNDARY AND CORNER HOWARD AVENUE

All that certain piece of [REDACTED] situated on the westerly side of Howard Avenue, in the City of [REDACTED] State of Connecticut, bounded and described as follows:

EASTERLY: by Howard Avenue, 40 feet, 7 inches, more or less;  
NORTHERLY: by land now or formerly of Peter Reynolds, 100 feet, more or less;  
WESTERLY: In part by land now or formerly of [REDACTED] and in part by land now or formerly of [REDACTED]  
SOUTHERLY: by land now or formerly of [REDACTED] 100 feet, more or less

REAL PROPERTY DEED [REDACTED] EDWARD AVENUE

[REDACTED]

**DATE:** [REDACTED] 2009

**TO HAVE AND TO HOLD:** [REDACTED]

**TO HAVE AND TO HOLD:** [REDACTED]

**TO HAVE AND TO HOLD:** [REDACTED], 21 feet, 6 1/2 feet

REAL PROPERTY DEED [REDACTED] WASHINGTON STREET

All that certain piece or parcel of land with all the improvements thereon, situated in the County of [REDACTED] State of Connecticut, known as [REDACTED]

**NORTH:** by Washington Street, 30 feet, 9 1/2 inches, more or less;

**EAST:** by Shepard Street, 100 feet, more or less;

**SOUTH:** by land now or formerly of John Whitten and Mary Whitten, 31 feet 9 1/2 inches, more or less;

**WEST:** by land now or formerly of [REDACTED], 100 feet, more or less.

REAL PROPERTY DEED [REDACTED] HURLBURT STREET

A certain piece or parcel of land with all the improvements thereon, situated in the County of [REDACTED] State of Connecticut, known as [REDACTED] and bounded and described as follows:

**EAST:** by Hurlburt Street, 20 feet;  
**SOUTH:** by land now or formerly of [REDACTED];  
**WEST:** by land now or formerly of [REDACTED];  
**NORTH:** by land now or formerly of [REDACTED].

REAL PROPERTY DEFENDANT NO. (26) 186 JAMES STREET

All that certain piece or parcel of land with the buildings and improvements thereon situated in the City and County of New Haven and State of Connecticut, known as 186 James Street, and bounded and described as follows:

EAST : by James Street, 33 Feet, more or less;  
NORTH : by land formerly of E. L. Glendon, now or lately of Louis M. Carter, 100 feet, more or less;  
WEST : by land now or formerly of Michaelina Massina, 30 feet, more or less; and  
SOUTH : by land now or formerly of John Costa, et al, 100 feet, more or less.

Said premises commonly known as 186 James Street, New Haven, CT

REAL PROPERTY DEFENDANT NO. (27) 265 JAMES STREET

All that certain piece or parcel of land, situated in the City of New Haven, County of New Haven and State of Connecticut, and bounded and described as follows:

West- by James Street, 40 feet;  
North- by land now or formerly of Michael and Mary Callahan, 100 feet;  
East- by a line parallel with the west line, 40 feet; and  
South- by land now or formerly of Elizabeth Boehm, 100 feet.



REAL PROPERTY DEFENDANT NO. (28) 382 LOMBARD STREET

[REDACTED]

NORTH: by [REDACTED], 30 feet;

EAST: by land now or formerly of James W. Brown, 100 feet;

SOUTH: by land now or formerly of [REDACTED] Church of Christ, 30 feet;

WEST: by land now or formerly of [REDACTED], 240 feet;

[REDACTED]

Said premises are further subject to the following:

1. [REDACTED]
2. [REDACTED]
3. [REDACTED]

REAL PROPERTY DEFENDANT NO. (29) 19-21 NORTON STREET

That certain piece or parcel of land with all the buildings and improvements thereon, situated in the Town of New Haven, County of New Haven and State of Connecticut, known as 19-21 Norton Street, and bounded:

Westerly: by Norton Street, 36 feet;

Northerly: by land now or formerly of William H H Hewitt, 87 feet, said northerly line being parallel and 32 feet southerly from the Southerly line of land now or formerly of Clara W. Coggeswell;

Easterly: by land now or formerly of Frederick H Coggeswell, 36 feet; and

Southerly: by land now or formerly of said William H H Hewitt 85 feet, more or less, all of 1 said line being as the fences stood on October 20, 1894.

REAL PROPERTY DESCRIBED IN AND BOUND BY NORTON STREET

All that certain piece of land, together with the buildings and all other improvements thereon, situated in the Town of New Haven, County of New Haven, State of Connecticut, known as 5000 Orchard Street, bounded as follows:

WESTERLY: by Norton Street, 50 feet more or less;  
 NORTHERLY: by land now or formerly of Nathaniel R. Malley, 135 feet more or less;  
 EASTERLY: in part by land of James F. Lee and Henrietta of the F. S. Parsons, in all, 135 feet more or less;  
 SOUTHERLY: by land of James F. Lee and Henrietta, 135 feet more or less.

REAL PROPERTY DESCRIBED IN AND BOUND BY ORCHARD STREET

All that certain piece of land, together with the buildings and all other improvements thereon, situated in the Town of New Haven, County of New Haven, State of Connecticut, known as 5000 Orchard Street, bounded as follows:

WEST : by Orchard Street, 47.6 feet, more or less;  
 NORTH: by land now or formerly of Samuel Langdon, 50 feet, more or less;  
 EAST : by land now or formerly of Benjamin Hall, 46.73 feet, more or less;  
 SOUTH: by land formerly of Joseph Olson, 50.13 feet more or less by a straight line of which the southerly and westerly boundaries are 98.7 feet from the southerly boundary line of the land now or formerly of Benjamin Hall.

REAL PROPERTY DESCRIBED IN AND BOUND BY ORCHARD STREET

All that certain piece of land, together with the buildings and all other improvements thereon, situated in the Town of New Haven, County of New Haven, State of Connecticut, known as 5000 Orchard Street, bounded as follows:

EASTERLY: by Orchard Street, 45 feet, more or less;  
 NORTHERLY: by land now or formerly of Almira Riggs, 140 feet, more or less;  
 WESTERLY: in part by land formerly of Pamela Twiss and in part by land now or formerly of Marie C. Root, in all, 45 feet, more or less;  
 SOUTHERLY: by land now or formerly of James A. McKenzie, 142 feet, more or less.

REAL PROPERTY DESCRIBED IN DEED DATED JANUARY 2, 1906

**THE CITY OF NEW HAVEN, CONNECTICUT**

**Westerly:** by [redacted] of the [redacted]  
**Northerly:** by [redacted] of [redacted] E. [redacted], [redacted] [redacted] feet,  
[redacted]  
**Easterly:** by [redacted] of [redacted] E. [redacted], [redacted] [redacted] feet,  
[redacted]  
**Southerly:** by [redacted] [redacted] [redacted] feet, more or less

REAL PROPERTY DESCRIBED IN DEED DATED JANUARY 2, 1906

**DESCRIPTION**

A certain piece or parcel of land with the buildings and all other improvements thereon, situated in the City of New Haven, County of New Haven, State of Connecticut, and bounded:

Easterly: by Plymouth Street, forty (40') feet, more or less;

Northerly: by land now or formerly of Thomas A. Carey, one hundred and thirty-seven (137') feet, five (5') inches, more or less;

Westerly: by land now or formerly of William J. Goodrich, Edward M. Clark and Frank P. Clark, forty (40') feet, more or less; and

Southerly: by land now or formerly of Wallace E. Clark, one hundred and thirty-seven (137') feet, five (5') inches, more or less.

**DESCRIPTION**

A certain piece or parcel of land located in the City of New Haven, County of New Haven and State of Connecticut, known as 1246 Plymouth Street, bounded and described as follows:

SOUTHEASTERLY by Plymouth Street, 40 feet;

NORTHEASTERLY by land now or formerly of [redacted], 137 1/2 feet, more or less;

NORTHEASTERLY by land now or formerly of [redacted], [redacted] feet; and

SOUTHWESTERLY by land now or formerly of [redacted], [redacted] feet, more or less.

**REAL PROPERTY DEEDS AND RECORDS OF ROCK CREEK ROAD**

ALL that certain piece or parcel of land, together with all improvements thereon situated in the Town and State of Connecticut, and more particularly known as Lot or Parcel N. 72 as shown on a map of the Town of New Haven, Connecticut, dated June 1, 1904, and recorded in the New England Survey Service, Inc., Civil Engineers & Surveyors, by E.L. Clark, Registered No. 01287-5101, which map or plat was filed in the Town Clerk's Office of the Town of New Haven in Map Book 15, Pages 1-14, inclusive.

Said premises are known as Nos. 97-99 Rock Creek Road, New Haven, Connecticut.

**REAL PROPERTY DEEDS AND RECORDS OF SHEFFIELD AVENUE**

All that certain piece or parcel of land, together with all improvements thereon, situated in the Town and State of Connecticut, and more particularly known as Lot or Parcel N. 72 as shown on a map of the Town of New Haven, Connecticut, dated June 1, 1904, and recorded in the New England Survey Service, Inc., Civil Engineers & Surveyors, by E.L. Clark, Registered No. 01287-5101, which map or plat was filed in the Town Clerk's Office of the Town of New Haven in Map Book 15, Pages 1-14, inclusive.

West- by Sheffield Avenue, 20 feet;

South- by land now or formerly of Richard C. Lowe and Henry E. Lowe, 14 feet;

East- by land now or formerly of Richard C. Lowe and Henry E. Lowe, 35 feet, more or less;

North- by land now or formerly of Richard C. Lowe and Henry E. Lowe, 15 feet, more or less.

**REAL PROPERTY DEEDS AND RECORDS OF SHELTER STREET**

All that certain piece or parcel of land, together with all improvements thereon, situated in the Town and State of Connecticut, and more particularly known as Lot or Parcel N. 72 as shown on a map of the Town of New Haven, Connecticut, dated June 1, 1904, and recorded in the New England Survey Service, Inc., Civil Engineers & Surveyors, by E.L. Clark, Registered No. 01287-5101, which map or plat was filed in the Town Clerk's Office of the Town of New Haven in Map Book 15, Pages 1-14, inclusive.

East- by Shelter Street, 35 feet;

South- by land formerly of Richard C. Lowe and Henry E. Lowe, 65 feet, 8 inches;

West- by land formerly of Richard C. Lowe and Henry E. Lowe, 20 feet, more or less;

South again- by land formerly of Richard C. Lowe and Henry E. Lowe, 14 feet, more or less;

West again- by land formerly of Richard C. Lowe and Henry E. Lowe, 15 feet, more or less; and

North- by land now or formerly of Richard C. Lowe and Henry E. Lowe, 15 feet, more or less.

REAL PROPERTY DEEDS AND RECORDS - SHELTER STREET

All that certain piece or parcel of land with the buildings and improvements thereon, situated in the City and County of New Haven and State of Connecticut known as Nos. 37-39 Shelter Street, bounded and described as follows:

Westerly: By Shelter Street, 38 feet;  
Northerly: By land now or formerly of Ella Beach, 39 feet, more or less;  
Easterly: By land now or formerly of Bennett L. Scott, 150 feet, more or less;  
Southerly: By land now or formerly of Bennett L. Scott, 150 feet, more or less.

The above described land was made by the [REDACTED] of [REDACTED] Grade 1

REAL PROPERTY DEEDS AND RECORDS - SHELTON AVENUE

[REDACTED]

REAL PROPERTY DEEDS AND RECORDS - SHELTON AVENUE

All that certain piece or parcel of land with the buildings and improvements thereon, situated in the City and County of New Haven and State of Connecticut known as 410-420 Shelton Avenue, and bounded and described as follows:

Easterly: By Shelton Avenue, 38 9/12<sup>th</sup> feet, more or less;  
Northerly: By land now or formerly of Bennett L. Scott, 150 feet, more or less;  
Westerly: By land now or formerly of Ella Beach, 39 9/12<sup>th</sup> feet, more or less;  
Southerly: By land now or formerly of Bennett L. Scott, 150 feet, more or less.

**REAL PROPERTY INTEREST IN LAND ON AN AVENUE**

**Satz 9.10** Sei  $\varphi: A \rightarrow B$  ein Homomorphismus und  $M$  ein  $A$ -Modul.

## REAL PROPERTY DISSENTERS' AND REMEDY AND REUE

**NOTWITHSTANDING:** by \_\_\_\_\_ or \_\_\_\_\_ of \_\_\_\_\_, \_\_\_\_\_, 142 feet, more  
or less.

REAL PROPERTY IDENTIFICATION NO. (42) 55-57 THOMPSON STREET

**WEEKLY:** [REDACTED] - [REDACTED], son of James T. Gordon,

REAL PROPERTY DEFENDANT NO. (44) 443 VALLEY STREET

[REDACTED]

REAL PROPERTY DEFENDANT NO. (45) 56-58 VICTORY DRIVE

All that certain piece or parcel of land with the buildings and improvements thereon, situated in the City of New Haven, County of New Haven and State of Connecticut, to wit:

Lot or Parcel No. 40 as shown on a certain map or plat entitled: "West Hill, New Haven, Connecticut, City of New Haven, Surveyed by the New Haven Survey Service, Inc., and shown on a certain map or plat entitled: "West Hill, New Haven, Connecticut, City of New Haven, Surveyed by the New Haven Survey Service, Inc., which map or plat was filed in the Town Clerk's Office of the City of New Haven, State of Connecticut, on or about August 15, 1944, inclusive, being known as Lot 40, Victory Drive, and bounded and described as follows:

Easterly: by Lot No. 35, in part, and in part by lot No. 35, as shown on said map, 30.40 feet;  
Northerly: by Lot No. 41, as shown on said map, 101.54 feet;  
Westerly: by Victory Drive, 35 feet;  
Southerly: by Lot No. 43, as shown on said map, 104.74 feet.

REAL PROPERTY DEFENDANT NO. (46) 159 WEST STREET

All that certain piece or parcel of land with the buildings and improvements thereon, situated in the City of New Haven, County of New Haven and State of Connecticut, known as 159 West Street, bounded and described as follows:

WEST: by West Street, 30 feet;  
NORTH: by land now or formerly of James Hart, 115 feet, more or less;  
EAST: in part by land now or formerly of George Carroll and in part by land now or formerly of Charles Moore, in all, 30 feet, more or less;  
SOUTH: by land now or formerly of Thomas Nackett, 115 feet, more or less.

**NOTE:** 40-85 Sup. removed from by L-100 as "copy of Letter on  
Walter Smith's 1st. report of 1st. April, 1968. Classics  
M. Smith, "The Highway", on file in the New Haven Town  
Club's Office.

**BASINELY:** 113.50 feet, minus or less, by Lot #11 on said map;

**SUMMARY:** 47.85 feet, more or less, by sounding down

**REMARKS:** 119804-6, [REDACTED]



**[REDACTED]**

Monthly: by first of month of same quarter. 120 Cts.  
more or less;

**Quantity:** by load more or less than of Joseph Mathias Hunt, Delaware, 128 feet, more or less;

**Sent to:** by hand mail or otherwise of South Dakota, 13th Cent.  
Name or Title:

\_\_\_\_\_

Washing Machine - 1 - 1000 - 1000 - 1000

**Remarks:** by the investigation of the specimens from bottom channel. 123 feet, near or below.

Printed by the Government of the State of New York, at the State Printing Office, Albany, 1900.

Postmark: ~~by the company that was to destroy it until June 1966.~~  
130 East 44th St. New York

A strip of land taken off the NW 1/4 of the quarter 34 is herein described, bounded:

Written by Winchester Adams, a first year

**Narrative:** [REDACTED]

**Exhibits:** by kind, name or number of Serial Section, & Book and

**Summary:** [REDACTED]

NGSFF: [REDACTED] one hundred  
[REDACTED] million, more  
[REDACTED]

REAL PROPERTY ~~RENTAL~~ ~~AND~~ ~~MANAGEMENT~~ AVENUE

WHEREAS, the said law on Licensing of Motor Vehicle, Chapter 10, Section 10-101, is hereby amended to read as follows:

**RESEARCH DESIGN**

