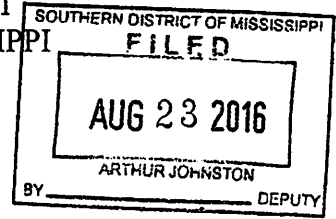


IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
SOUTHERN DIVISION



UNITED STATES OF AMERICA

v.

CRIMINAL NO. *1:16CR61 HSO JCG*

THOMAS LEPRE
a/k/a Lenny Lepre

18 U.S.C. § 1343

The Grand Jury charges:

At all times relevant to this indictment:

1. Defendant **THOMAS LEPRE a/k/a Lenny Lepre**, and others, formed a Mississippi Partnership by the name Alternative Financing Group (“AFG”) in or about March of 2012, purportedly to provide clients with commercial financing services.

2. Defendant **LEPRE** sought investors as sources to obtain funding for various commercial financing services for the purported purpose of making loans to individual clients seeking commercial financing services and sources of capital for various enterprises.

COUNTS 1 – 5

3. Beginning on or about December, 2012, and continuing through on or about July, 2014, in Harrison and Jackson Counties, in the Southern Division of the Southern District of Mississippi, and elsewhere, the defendant, **THOMAS LEPRE a/k/a Lenny Lepre**, aided and abetted by others known and unknown to the Grand Jury, intentionally devised and intended to devise a scheme and artifice to defraud and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, and in furtherance thereof, did cause to be transmitted by means of wire or radio communications in interstate commerce,

certain wire communications and writings, signs, signals, pictures, or sounds, for the purpose of executing the scheme.

4. It was part of the scheme and artifice to defraud in order to accomplish his fraudulent purposes that Defendant **LEPRE**, aided and abetted by others known and unknown to the Grand Jury, made materially false and fraudulent representations and solicited significant sums of money from investors and clients purportedly for funding of commercial services to borrowing clients, and for investments, and converted his investors and client borrowers's monies to his own use and possession, using the funds inconsistently with the representations he had made to the investors and clients.

5. It was a further part of the scheme that Defendant **LEPRE** would unjustly enrich himself by deceiving individuals who had relied on him to make sound and secure loans and investments by instead either secretly converting their investment money and earnest money to his own personal use and enjoyment, all the while intending to deceive or lull his investors and clients into believing that the loans and investments were properly sought.

6. It was further a part of this scheme that the Defendant **LEPRE**, through both oral and written representations, provided investors and clients with false and misleading information regarding alleged promissory notes, security agreements, and specific guaranties, and would conceal, misrepresent and hide, and cause to be concealed, misrepresented and hidden, the existence, purpose, and acts done in the furtherance of the scheme, continuing up to and through the dates set forth in this indictment.

7. On or about each of the dates set forth below, in Harrison and Jackson Counties, in the Southern Division of the Southern District of Mississippi, and elsewhere, the defendant, **THOMAS LEPRE a/k/a Lenny Lepre**, aided and abetted by others known and unknown to the

Grand Jury, for the purpose of executing the scheme described above, caused to be transmitted by means of wire communication in interstate commerce certain writings, signals, pictures and sounds by means of a wire transfer, with each constituting a separate count:

COUNT	DATE	DESCRIPTION
1	March 5, 2013	A wire transfer in the amount of \$65,795.00 from outside the State of Mississippi to a bank account at Wells Fargo in Ocean Springs, Mississippi
2	March 19, 2013	A wire transfer in the amount of \$62,000.00 from outside the State of Mississippi to a bank account at Wells Fargo in Ocean Springs, Mississippi
3	May 10, 2013	A wire transfer in the amount of \$27,294.00 from outside the State of Mississippi to a bank account at Wells Fargo in Ocean Springs, Mississippi
4	May 24, 2013	A wire transfer in the amount of \$250,000.00 from outside the State of Mississippi to a bank account at Wells Fargo in Ocean Springs, Mississippi
5	June 10, 2013	A wire transfer in the amount of \$114,000.00 from outside the State of Mississippi to a bank account at Wells Fargo in Ocean Springs, Mississippi

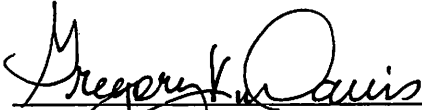
All in violation of Sections 1343 and 2, Title 18, United States Code.

NOTICE OF INTENT TO SEEK CRIMINAL FORFEITURE

As a result of committing the offenses as alleged in this Indictment, the defendant shall forfeit to the United States all property involved in or traceable to property involved in the offenses, including but not limited to all proceeds obtained directly or indirectly from the offenses, and all property used to facilitate the offenses. Further, if any property described above, as a result of any act or omission of the defendant: (a) cannot be located upon the exercise of due diligence; (b) has been transferred or sold to, or deposited with, a third party; (c) has been placed beyond the jurisdiction of the Court; (d) has been substantially diminished in value; or (e) has been commingled with other property, which cannot be divided without difficulty, then it is the

intent of the United States to seek a judgment of forfeiture of any other property of the defendant, up to the value of the property described in this notice or any bill of particulars supporting it.

All pursuant to Section 982(a)(7), Title 18, United States Code.


GREGORY K. DAVIS
United States Attorney

A TRUE BILL:

s/signature redacted
Foreperson of the Grand Jury

This indictment was returned in open court by the foreperson or deputy foreperson of the grand jury on this the 23rd day of August, 2016.


UNITED STATES MAGISTRATE JUDGE