FILED
CLERK, U.S. DISTRICT COURT

10/15/2021
CENTRAL DISTRICT OF CALIFORNIA
BY: DTA DEPUTY

28 ///

UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

SOUTHERN DIVISION

No. 8:21-cr-00185-DOC

[18 U.S.C. § 1343: Wire Fraud]

The Acting United States Attorney charges:

[18 U.S.C. § 1343]

A. INTRODUCTORY ALLEGATIONS

UNITED STATES OF AMERICA,

VERLIN SANCIANGCO,

Plaintiff,

Defendant.

v.

- 1. At times relevant to this Information, defendant
 VERLIN SANCIANGCO was a licensed real estate broker at Westrend
 Realty, Inc. located in Riverside, California.
- 2. In 2016, victims B.W. and K.L. purchased an investment property located in San Clemente, California (the "Investment Property"), through their company, CLC Capital, LLC, a limited liability company registered in California.

B. THE SCHEME TO DEFRAUD

- 3. Beginning in or around January 2016 and continuing to in or around November 2018, in Orange and Riverside Counties, within the Central District of California, and elsewhere, defendant SANCIANGCO knowingly and with the intent to defraud, devised and executed a scheme to defraud and obtain money from B.W. and K.L. by means of materially false and fraudulent pretenses, representations, and promises, and the concealment of material facts.
- 4. In carrying out the scheme, defendant SANCIANGCO engaged in the following fraudulent and deceptive acts, practices, and devices, among others:
- a. Defendant SANCIANGCO, in his capacity as a real estate broker, represented B.W. and K.L. in the sale of the Investment Property.
- b. Unbeknownst to B.W. and K.L., on January 22, 2016, defendant SANCIANGCO opened a bank account at Bank of America in the name of CLC Capital, LLC -- which was the same name of the entity through which B.W. and K.L. purchased the Investment Property -- listing himself as the authorized signor and member of the entity.
- d. In December 2017, defendant SANCIANGCO sold the Investment Property without informing B.W. and K.L. of the sale. Defendant SANCIANGCO directed the proceeds of the all-cash sale to the CLC Capital Bank of America account that defendant SANCIANGCO controlled.

- e. Instead of forwarding the proceeds of the sale of the Investment Property to B.W. and K.L., defendant SANCIANGCO took the proceeds and used them for personal purposes.
- 5. By devising and executing the fraudulent scheme, defendant SANCIANGCO caused B.W. and K.L. to lose over \$700,000.

C. THE USE OF AN INTERSTATE WIRE

6. On or about December 26, 2017, within the Central District of California, and elsewhere, for the purpose of executing the above-described scheme to defraud, defendant SANCIANGCO caused the transmission, by means of wire communication in interstate commerce, of \$100,000 that constituted the proceeds of the sale of the Investment Property from a Bank of America account defendant SANCIANGCO controlled in Riverside, California to Coinbase's Metropolitan Commercial Bank account in New York.

TRACY L. WILKISON
Acting United States Attorney

Sagar

SCOTT M. GARRINGER Assistant United States Attorney Chief, Criminal Division

BENJAMIN R. BARRON Assistant United States Attorney Chief, Santa Ana Branch Office

JENNIFER L. WAIER Assistant United States Attorney Deputy Chief, Santa Ana Branch Office