

Short list 12 core crimes - full list 221 crimes over 16 months

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Predicate acts: 12 core crime cards (short list)

1. Wire Fraud

Electronic transmission used to execute a scheme to deprive the tenant of funds or property.

Key evidence: EX-005 (Wells Fargo record 4/19/2024 \$5,000), text confirmations, bank tracer.

2. Mail Fraud

Use of the mail (certified/UPS) to transport or conceal transactional instruments or contracts.

Key evidence: USPS certified receipt showing package signed at Berkshire office; EX-037.

3. Bank Fraud / Fraud on Financial Instrument

Misuse, diversion, or concealment of cashier's checks and e-deposits intended as rent.

Key evidence: Bank records, e-deposit traces, check image signed at Berkshire.

4. Forgery / Counterfeiting Corporate Seal

Counterfeit DocuSign or forged corporate seal used to fabricate a lease or alter terms.

Key evidence: DocuSign/AuthentiSign metadata; mismatch in signature timestamps and license records.

5. Extortion / Coercion

Threats to evict or otherwise coerce tenant into paying outside the contractual terms.

Key evidence: Texts demanding payment to a private account and eviction threats tied to signing a new contract.

6. False Billing / Invoice Fraud

Fabricated contractor invoices for remodeling and billing the tenant for items not performed.

Key evidence: LY Construction invoice vs. market prices (Home Depot screenshots) and absence of receipts from third-party installers.

7. Fraud on the Court / Perjury

Filing or testifying under oath while knowing of contradictory documentary proof (payment receipts presented in court).

Key evidence: Courtroom audio/video, text showing owner acknowledged receipt, USPS/bank evidence shown to court.

8. Retaliatory Eviction

Eviction initiated following tenant's good-faith complaints to police and regulators regarding fraud and habitability.

Key evidence: Timing of complaints to police/DRE vs. eviction filing; lack of prior defaults.

9. Attorney Misconduct / Obstruction

Withholding exculpatory documents, misrepresenting payment status in filings, or intentionally misdirecting process servers.

Key evidence: Court filings, certified mail tracking, communication logs with counsel.

10. Elder Abuse / Discrimination (if applicable)

Failing to provide interpreter or reasonable accommodations and taking advantage of a disabled tenant.

Key evidence: ADA accommodation requests, medical records showing disability and stress injuries tied to the eviction process.

11. Conspiracy / Coordinated Scheme

Agreement among the owner, agent, and others to execute a coordinated fraudulent plan to extract funds and remove tenant.

Key evidence: Cross-referenced communications, repeated patterns of the same scheme across transactions.

12. RICO Pattern (Enterprise Liability)

Multiple predicate acts establishing a continuing criminal enterprise for financial gain.

Key evidence: Aggregate of mail/wire/fraud/forgery acts dated and mapped to actors; pattern satisfies "continuity" and "relatedness"