

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF ILLINOIS**

**UNITED STATES OF AMERICA,**

**Plaintiff,**

**vs.**

**BRANDON ZANOTTI,**

**Defendant.**

**CRIMINAL NO. 24-cr-40008-JPG**

**STIPULATION OF FACTS**

The United States of America by and through its attorney, Hal Goldsmith, Special Attorney to the United States Attorney General Pursuant to 28 U.S.C., Section 515, and the defendant, Brandon Zanotti, by and through his attorney, G. Patrick Murphy, hereby stipulate as follows:

1. Brandon Zanotti (hereinafter referred to as "Defendant") owned seven commercial rental properties located in Williamson and Franklin Counties, Illinois through a company he was a part owner of, Results Home Buyers 2, LLC. During 2022, Defendant, through Results Home Buyers 2, LLC, entered into an agreement to sell the seven commercial rental properties to Lawler and Maze Properties, LLC, owned by Justin Maze and David Lawler. Lawler and Maze Properties, LLC financed the full purchase price of the properties through a loan from SouthernTrust Bank.

2. Steven Cook (hereinafter referred to as "Cook") was the President of SouthernTrust Bank. SouthernTrust Bank had branches located in Marion, Vienna, and Goreville, Illinois, and its deposits were insured by the Federal Deposit Insurance Corporation ("FDIC"). In addition to running and supervising the day-to-day operations of the bank, Cook served as a member of SouthernTrust Bank's Board of Trustees, as well as a member of its Loan Committee. Cook facilitated the sale by Results Home Buyers 2 of its seven commercial rental properties to Lawler

and Maze Properties, LLC during 2022 by approving and obtaining approval of the SouthernTrust Bank loan to Lawler and Maze Properties, LLC.

3. On or about March 26, 2022, Defendant inquired of Justin Maze whether Maze was interested in buying the seven commercial rental properties owned by Results Home Buyers 2, LLC. Maze advised Defendant that his company was, in fact, interested in purchasing the seven properties.

4. On April 6, 2022, Defendant, Maze, and Cook met at SouthernTrust Bank in Marion, Illinois and discussed the proposed sale of the seven properties. Cook agreed that SouthernTrust Bank would lend Lawler and Maze Properties, LLC the funds necessary to purchase the seven properties from Results Home Buyers 2. It was understood by Defendant, Maze, and Cook that the proposed transaction was a new real estate purchase, not a refinance; that Lawler and Maze Properties, LLC would not provide any cash relative to the purchase of the seven properties; and that the entire purchase price would be funded through the SouthernTrust loan proceeds. Cook advised Defendant that in order for SouthernTrust Bank to finance the transaction, it would need to appear as if it was a refinance transaction, as opposed to a new real estate purchase, and that the paperwork would need to reflect that Lawler and Maze Properties, LLC had owned the seven properties as of February 1, 2022. It was agreed that the paperwork reflecting ownership of the seven properties by Lawler and Maze Properties, LLC would be falsely backdated to February 1, 2022, and that SouthernTrust Bank would fund an 80% sham "refinance" transaction. The actual sales price of the seven properties that Results Home Buyers 2, LLC was to sell to Lawler and Maze Properties, LLC was \$436,122.00.

5. During May, 2022, Defendant, through Results Home Buyers 2, executed a sham Assignment of Beneficial Interests falsely reflecting in essence that Lawler and Maze Properties, LLC had owned the seven properties as of February 1, 2022. That false and backdated "Assignment of Beneficial Interests" was provided to Cook, and maintained in the books and records of SouthernTrust Bank.

6. During June, 2022, a Purchase and Sales Agreement, falsely backdated to February 1, 2022, was executed by Results Home Buyers 2, LLC and Lawler and Maze Properties, LLC which reflected a false purchase price of \$545,152.00. This false Purchase and Sales Agreement was provided to Cook and SouthernTrust Bank and was maintained in the books and records of SouthernTrust Bank.

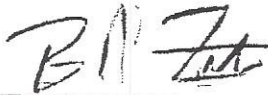
7. On June 21, 2022, a false Credit Approval Form was created by SouthernTrust Bank which falsely stated a purchase price of \$545,152.00, and a cash downpayment from Lawler and Maze Properties, LLC of \$109,030.00 when, in fact, as Defendant, Cook and Maze knew, the actual purchase price was \$436,122.00 and there was to be no cash downpayment. The false Credit Approval Form was maintained in the books and records of SouthernTrust Bank.

8. On August 12, 2022, Cook and SouthernTrust funded the sham "refinance" transaction at 80% of the false purchase price of \$545,152.00, resulting in a total payout to Results



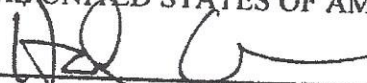
Home Buyers 2, LLC of \$436,122.00, the agreed upon 80%.

So stipulated this 24 day of March, 2024.

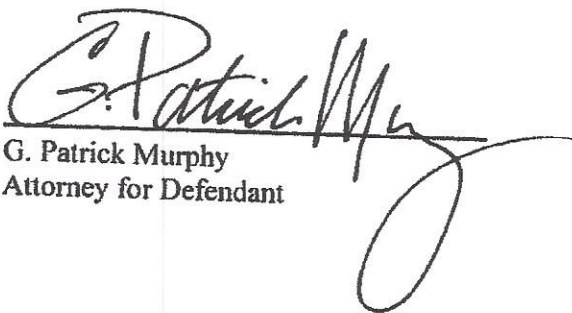


Brandon Zanotti  
Defendant

THE UNITED STATES OF AMERICA



Hal Goldsmith  
Special Attorney to the United States  
Attorney General  
Pursuant to 28 U.S.C., Section 515



G. Patrick Murphy  
Attorney for Defendant