

payment to a chop shop operator, which he did.

4. On or about April 3, 2002, C.M. falsely reported to the Philadelphia Police Department and Progressive Insurance Company that her 1998 Ford Contour (VIN 1FALP6534WK114536) had been stolen on or about April 1, 2002.

5. C.M. made these false reports to the police and Progressive Insurance Company knowing that this would result in Progressive Insurance Company paying off the loan for the vehicle.

6. Defendant BRANDON SHAHADI and C.M. intended to cause a loss of approximately \$5,169.94 to Progressive Insurance Company as a result of their mail fraud.

7. On or about May 6, 2002, at Plymouth Meeting, Pennsylvania, in the Eastern District of Pennsylvania and elsewhere, having devised and intending to devise the scheme, defendant

BRANDON SHAHADI,

for the purpose of executing the scheme described above and attempting to do so, knowingly caused to be delivered by mail, a check in the amount of \$5,124.20, mailed from Progressive Insurance Company, in Plymouth, Pennsylvania, to Ford Motor Credit in Columbia, Maryland,

which paid off the financing for the 1998 Ford Contour that C.M. had falsely reported as stolen.

All in violation of Title 18, United States Code, Section 1341.

PATRICK L. MEEHAN
United States Attorney