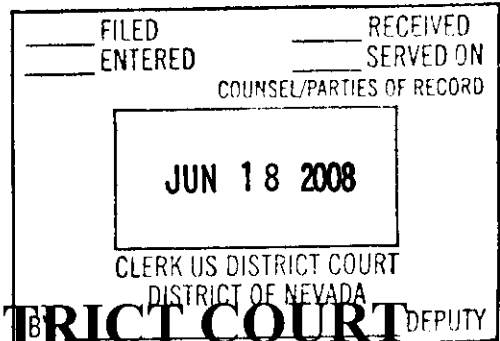


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5
6 **UNITED STATES DISTRICT COURT**
7 **DISTRICT OF NEVADA**

8 -oOo-

9
10 UNITED STATES OF AMERICA,) SUPERSEDING INDICTMENT
)
11 Plaintiff,) 2:08-cr-0064-RLH-GWF
)
12 VS.) **VIOLATIONS:**
)
13 STEVEN W. GRIMM,) 18 U.S.C. § 1349 - Conspiracy to Commit
EVE E. MAZZARELLA,) Bank Fraud, Mail Fraud, and Wire Fraud
14 MELISSA R. BEECROFT,) 18 U.S.C. § 1344 - Bank Fraud
CHRISTINA R. THOMPSON,) 18 U.S.C. § 2 - Aiding and Abetting
15 AMY R. ORTIZ, and) 18 U.S.C. § 1956(h) - Conspiracy to Commit
JYOTHI PANIKKAR,) Money Laundering
16 a/k/a JOE PANIKKAR,) 18 U.S.C. § 1957 - Engaging in Monetary
) Transactions in Property Derived From
) Specified Unlawful Activity
17 Defendants.) 26 U.S.C. § 7206(2) - Aid and Assist with
) Fraud and False Statements
18

19 **THE GRAND JURY CHARGES THAT:**

20 **INTRODUCTION**

21 At all times relevant to this Indictment:

- 22 1. Defendant **STEVEN W. GRIMM** was resident agent, president, secretary,
23 treasurer, and director of Pro Design, Incorporated (“Pro Design”), Premier Design Concepts, Inc.
24 (“Premier Design”), and R. E. Property Solutions, Inc., each of which are Nevada Corporations.
25 2. Defendant **EVE E. MAZZARELLA** was resident agent, president, secretary,
26 treasurer, and director of Distinctive Real Estate & Investments (“DREI”), a Nevada Corporation.

1 3. Defendant **EVE E. MAZZARELLA** was a signor on the bank account of Premier
2 Design.

3 4. The defendant **STEVEN W. GRIMM** was resident agent and manager of the
4 following Limited-Liability Companies registered with the Nevada Secretary of State:

- | | | |
|----|------------------|-----------------|
| 5 | ABROWN, LLC | ADAVENPORT, LLC |
| | ANTIGREEN, LLC | BFAGIN, LLC |
| 6 | BINGRAM, LLC | BLABEE, LLC |
| | CHOOVER, LLC | CLOUCEL, LLC |
| 7 | CROJAS, LLC | CSHEETS, LLC |
| | CTHOMPSON, LLC | DMARK, LLC |
| 8 | DRJAC, LLC | DSHEETS, LLC |
| | IDEAN, LLC | JELDRED, LLC |
| 9 | JGARVEY, LLC | JGREEN, LLC |
| | JGRIMM, LLC | KBROWN, LLC |
| 10 | KJAMES, LLC | KTINAGLIA, LLC |
| | LOQUINN, LLC | MTHOM, LLC |
| 11 | PALTMANN, LLC | RFAGIN, LLC |
| | RKSAM, LLC | SALLIUZZA, LLC |
| 12 | SCOMER, LLC | SDKLA, LLC |
| | STLIUZZA, LLC | TLIUZZA, LLC |
| 13 | TMCGUIRE, LLC | VAMINOR, LLC |
| | VSQUILLANTE, LLC | WDAVENPORT, LLC |
| 14 | | |

15 5. The defendant **STEVEN W. GRIMM** was manager of the following Limited-
16 Liability Companies registered with the Nevada Secretary of State:

- | | | |
|----|-----------------|---------------------|
| 17 | CGARVEY, LLC | JCORTES, LLC |
| | DWALLACE, LLC | JWINSLOW, LLC |
| 18 | JSTEVENS, LLC | PILDE, LLC |
| | MWINOWSKI, LLC | SSTEP, LLC |
| 19 | RBEUCHAT, LLC | TVANOOSTENDORP, LLC |
| | TVANCLEVE, LLC | |
| 20 | WPATTERSON, LLC | |

21 6. The defendant **STEVEN W. GRIMM** was resident agent of the following Limited-
22 Liability Company registered with the Nevada Secretary of State:

- | | | |
|----|-------------|----------------------|
| 23 | KLARES, LLC | LEDIAZ, LLC |
| | RID, LLC | Select Equities, LLC |
| 24 | | |

25 7. Select Equities, LLC was resident agent and manager of the following Limited-
26 Liability Companies registered with the Nevada Secretary of State:

- | | | |
|---|---------------------------------------|---------------------------------------|
| 1 | Select Equities Investments I, LLC | Select Equities Investments II, LLC |
| | Select Equities Investments III, LLC | Select Equities Investments IV, LLC |
| 2 | Select Equities Investments V, LLC | Select Equities Investments VI, LLC |
| | Select Equities Investments VII, LLC | Select Equities Investments VIII, LLC |
| 3 | Select Equities Investments IX, LLC | Select Equities Investments X, LLC |
| | Select Equities Investments XI, LLC | Select Equities Investments XII, LLC |
| 4 | Select Equities Investments XIII, LLC | Select Equities Investments XIV, LLC |
| | Select Equities Investments XV, LLC | Select Equities Investments XVI, LLC |
| 5 | Select Equities Investments XVII, LLC | |

6 8. Defendants **STEVEN W. GRIMM** and **EVE E. MAZZARELLA** had joint
7 signatory authority over the following bank accounts at Colonial Bank:

8	<u>Account Holder</u>	<u>Account Number</u>
	2412 Broadway Ave E., LLC	XXXXXX8786
9	ANTIGREEN, LLC	XXXXXX9968
	BFAGIN, LLC	XXXXXX9984
10	BINGRAM, LLC	XXXXXX8158
	CHOOVER, LLC	XXXXXX4681
11	COQUINN, LLC	XXXXXX5407
	CTHOMPSON, LLC	XXXXXX7592
12	DMARK, LLC	XXXXXX9016
	DRJAC, LLC	XXXXXX3293
13	JELDRED, LLC	XXXXXX3301
	JGREEN, LLC	XXXXXX8604
14	JGRIMM, LLC	XXXXXX4848
	KBROWN, LLC	XXXXXX8869
15	KJAMES, LLC	XXXXXX8596
	KLARES, LLC	XXXXXX3194
16	KTINGLIA, LLC	XXXXXX8612
	LEDIAZ, LLC	XXXXXX7469
17	LOQUINN, LLC	XXXXXX7261
	MTHOM, LLC	XXXXXX3335
18	RFAGIN, LLC	XXXXXX9992
	RID, LLC	XXXXXX3343
19	RKSAM, LLC	XXXXXX3178
	SALLIUZZA, LLC	XXXXXX4855
20	SDKLA, LLC	XXXXXX3160
	Select Equities Investments XI, LLC	XXXXXX2824
21	Select Equities Investments XV, LLC	XXXXXX2857
	Select Equities LLC Investments XVI, LLC	XXXXXX2865
22	SSTEP, LLC	XXXXXX3327
	STLIUZZA, LLC	XXXXXX7584
23	VAMINOR, LLC	XXXXXX8620
	WPDAVENPORT, LLC	XXXXXX5555

24
25 9. Defendant **STEVEN W. GRIMM** had sole signatory authority over Bank of America
26 account number XXXXXX4471 in the name of Pro Design.

10. Defendant **STEVEN W. GRIMM** had sole signatory authority over the following bank accounts at Colonial Bank:

<u>Account Holder</u>	<u>Account Number</u>
ADAVENPORT, LLC	XXXXXXX8174
BLABEE, LLC	XXXXXXX8794
CGARVEY, LLC	XXXXXXX9810
DWALLACE, LLC	XXXXXXX9828
IDEAN, LLC	XXXXXXX8182
JBARNES, LLC	XXXXXXX9885
JCORTES, LLC	XXXXXXX9802
JGARVEY, LLC	XXXXXXX8844
JSTEVENS, LLC	XXXXXXX9901
JWINSLOW, LLC	XXXXXXX9844
MWINOWSKI, LLC	XXXXXXX9869
Patriot Grading & Utilities, LLC	XXXXXXX9927
Patriot Transport, LLC	XXXXXXX4077
PILDE, LLC	XXXXXXX8141
RBEUCHAT, LLC	XXXXXXX9794
RGARVEY, LLC	XXXXXXX9851
SCOMER, LLC	XXXXXXX9032
Select Equities, LLC	XXXXXXX5035
Steven Grimm	XXXXXXX1628
TLIUZZA, LLC	XXXXXXX8190
TMCGUIRE, LLC	XXXXXXX8851
TVANCLEVE, LLC	XXXXXXX9935
TVANOOSTENDORP, LLC	XXXXXXX9836
VSQUILLANTE, LLC	XXXXXXX9024
WPATTERSON, LLC	XXXXXXX9893

11. Defendant **EVE E. MAZZARELLA** had signatory authority over the following bank accounts:

<u>Account Holder</u>	<u>Bank</u>	<u>Account Number</u>
ABROWN, LLC	Colonial Bank	XXXXXXX4119
CLOUCEL, LLC	Colonial Bank	XXXXXXX4127
CROJAS, LLC	Colonial Bank	XXXXXXX4143
Distinctive Real Estate & Investments	First Republic Bank	XXXXXXXX1312
Distinctive Real Estate & Investments	First Republic Bank	XXXXXXXX5144
Distinctive Real Estate & Investments, Inc.	Washington Mutual	XXXXXX6267
Distinctive Real Estate & Investments, Inc.	Wells Fargo Bank	XXXXXXX9111
Distinctive Real Estate & Investments, Inc.	Wells Fargo Bank	XXXXXXX9680
Eve E.Mazzarella	Bank of America	XXXXXXX3017
Eve E Mazzarella	First Republic Bank	XXXXXXXX5436
Eve E.Mazzarella	Bank of America	XXXXXXX7670
Eve E.Mazzarella	Washington Mutual	XXXXXXX8778
Eve E.Mazzarella	Wells Fargo Bank	XXXXXXX8970
Giovanni K Mazzarella - A Minor by Eve E Mazzarella	Wells Fargo Bank	XXXXXXX8487

1	PALTMANN, LLC	Colonial Bank	XXXXXXX4135
	Premier Design Concepts, Inc.	Bank of America	XXXXXXX4578
2	Select Equities, LLC	Wells Fargo Bank	XXXXXXX0544
	Select Equities, LLC	Washington Mutual	XXXXXXX6472
3	Select Equities Investments III, LLC	Wells Fargo Bank	XXXXXXX0569
	Select Equities Investments III, LLC	Wells Fargo Bank	XXXXXXX0577
4	Select Equities Investments IV, LLC	Wells Fargo Bank	XXXXXXX0585
	Select Equities Investments V, LLC	Wells Fargo Bank	XXXXXXX0593
5	Select Equities Investments VI, LLC	Wells Fargo Bank	XXXXXXX0601
	Select Equities Investments VII, LLC	Wells Fargo Bank	XXXXXXX0619
6	Select Equities Investments VIII, LLC	Wells Fargo Bank	XXXXXXX0627
	Select Equities Investments IX, LLC	Wells Fargo Bank	XXXXXXX0536
7	Stephen Lindsay - A Minor By Eve E Mazzarella	Wells Fargo Bank	XXXXXXX1600

8 12. Defendant **MELISSA R. BEECROFT** was resident agent and manager of Secured
9 Mortgage Services, LLC (“Secured Mortgage”), a Limited Liability Company registered with the
10 Nevada Secretary of State.

11 13. Defendant **CHRISTINA R. THOMPSON** was resident agent and manager of CRT
12 Consulting, LLC, a Limited Liability Company registered with the Nevada Secretary of State.

13 14. Defendant **JYOTHI PANIKKAR** was managing member of Integrity Mortgage,
14 LLC, a Limited Liability Company registered with the Nevada Secretary of State.

15 15. Defendant **AMY R. ORTIZ** was Registered Agent, President, Secretary, and
16 Treasurer of Reliant Mortgage Corporation a domestic corporation registered with the Nevada
17 Secretary of State.

18 16. A “straw buyer” is an individual who allows residential real estate (“property” or
19 “properties”) to be purchased in his or her name to facilitate the acquisition of that property by an
20 unidentified party.

21 17. A “third party disbursement” is the issuance of money at the closing of a mortgage
22 loan to a person or entity that is typically not entitled to money at the close of the transaction as are
23 the seller, buyer, or any of the business entities that contributed to the creation or conducting of the
24 transaction and similar entities such as realtors, mortgage companies, lenders, mortgage brokers, title
25 and escrow companies, etc.

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COUNT ONE

Conspiracy to Commit Bank Fraud, Mail Fraud, and Wire Fraud

1. Paragraphs 1 through 17 of the introduction to this Indictment are re-alleged and incorporated herein as if set forth in full.

2. From in or about 2003 to on or about March 12, 2008, in the State and Federal District of Nevada and elsewhere,

**STEVEN W. GRIMM,
EVE E. MAZZARELLA,
MELISSA R. BEECROFT,
CHRISTINA R. THOMPSON,
AMY R. ORTIZ, and
JYOTHI PANIKKAR,**

defendants herein, knowingly and willfully combined, conspired, and agreed with each other, and with others known and unknown to the grand jury:

a. To devise a scheme and artifice to defraud and to obtain money and property under the custody and control of federally-insured financial institutions, by means of false and fraudulent pretenses, representations and promises that would cause a bank to part with money or property in violation of Title 18, United States Code, Section 1344.

b. To use the United States Postal Service and commercial interstate carriers to send and deliver mortgage loan applications and other supporting documentation, for purposes of executing a scheme and artifice to defraud and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises, in violation of Title 18, United States Code, Section 1341; and

c. To transmit and cause to be transmitted by means of wire communications in interstate commerce, funds, for purposes of executing a scheme and artifice to defraud and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises, in violation of Title 18, United States Code, Section 1343.

1 The Objectives of the Conspiracy and Scheme to Defraud

2 3. The object of the conspiracy and scheme was to obtain money and property by
3 causing false information regarding straw buyers' employment, income, and assets to be placed in the
4 straw buyers' applications and supporting documentation to obtain mortgage loans from financial
5 institutions to purchase residential real estate ("property" or "properties"). Through these
6 transactions, defendants obtained control of approximately 227 properties and obtained money from
7 financial institutions by causing the money from the mortgage loans to be diverted to their own use
8 and benefit and the use and benefit of others. The total purchase price of the approximate 227
9 properties was greater than \$107,000,000.

10 Manner and Means

11 4. The manner and means by which the objectives of the conspiracy were accomplished
12 include, but were not limited to, the following:

13 a. It was part of the conspiracy that defendants solicited persons and caused
14 persons with good credit ratings to be solicited to act as straw buyers to purchase properties.

15 b. It was further part of the conspiracy that defendants caused straw buyers to
16 make offers to purchase properties substantially above the sellers' asking prices. Defendants caused
17 the sellers to agree that the excess funds be redirected to business entities controlled by **GRIMM** and
18 **MAZZARELLA** under the pretense of making upgrades or repairs to the properties.

19 c. It was further part of the conspiracy that defendants caused straw buyers to
20 apply for mortgage loans from financial institutions to purchase properties.

21 d. It was further part of the conspiracy that defendants knowingly placed and
22 caused to be placed on the straw buyers loan applications and supporting documentation, materially
23 false information regarding straw buyers' places of employment, income, assets, and intention to
24 occupy the properties as their primary residences which information defendants then and there well
25 knew to be false.

26

1 e. It was further part of the conspiracy that defendants caused financial
2 institutions to transmit through interstate wire communications money to fund the mortgage loans.

3 f. It was further part of the conspiracy that defendants caused title and escrow
4 companies to make third party disbursements to entities which were controlled by defendants
5 **GRIMM** and **MAZZARELLA** and are identified in the introduction hereto, for defendants
6 **GRIMM**'s and **MAZZARELLA**'s own use and benefit.

7 g. It was further part of the conspiracy that defendants **GRIMM** and
8 **MAZZARELLA** caused mortgage brokers, loan officers and others associated with the straw buyer
9 transactions to remit a portion of their commissions and fees to defendants **GRIMM** and
10 **MAZZARELLA**.

11 h. It was further part of the conspiracy that defendants paid persons to be straw
12 buyers.

13 i. It was further part of the conspiracy that defendants created numerous limited
14 liability companies ("LLC" or "LLC's") identified in the introduction hereto. Defendants named the
15 LLC's after straw buyers, typically using the straw buyers first initial and last name.

16 j. It was further part of the conspiracy that defendants caused straw buyers to
17 sign documents transferring their interest in the properties they had purchased into one of the LLC's.
18 Defendants would not pay straw buyers for the use of their identities until they transferred their
19 interest in a property to an LLC.

20 k. It was further part of the conspiracy that defendants opened bank accounts
21 for each LLC. These bank accounts are identified in the introduction hereto.

22 l. It was further part of the conspiracy that defendants **GRIMM** and
23 **MAZZARELLA** used the LLC bank accounts to control the illicit proceeds of the mortgage
24 transactions.

25 m. It was further part of the conspiracy that once defendants **GRIMM** and
26 **MAZZARELLA** obtained control over a property through a straw buyer transaction, defendants

1 would again sell the same property to another straw buyer at an inflated price. Defendants thereby
2 engaged in approximately 432 straw buyer transactions involving the approximate 227 properties.

3 n. It was further part of the conspiracy that defendants **GRIMM** and
4 **MAZZARELLA** defaulted on mortgage payments on many of the mortgage loans which caused the
5 related properties to go into foreclosure. At least 143 of the approximate 227 properties purchased
6 by defendants have been sold in foreclosure causing losses to financial institutions greater than
7 seventeen million dollars (\$17,000,000) to the date of this superseding indictment.

8 All in violation of Title 18, United States Code, Section 1349.

9 **COUNTS TWO THROUGH FOURTEEN**
10 Bank Fraud

11 1. The allegations set forth in the introduction and count one to this Indictment are re-
12 alleged and incorporated by reference as though fully set forth herein.

13 2. From in or about 2003, to on or about March 12, 2008, in the State and Federal
14 District of Nevada,

15 **STEVEN W. GRIMM,**
16 **EVE E. MAZZARELLA,**
17 **MELISSA R. BEECROFT,**
18 **CHRISTINA R. THOMPSON,**
AMY R. ORTIZ, and
JYOTHI PANIKKAR,

19 defendants herein, did devise and intend to devise a scheme and artifice to defraud and to obtain
20 money and property under the custody and control of federally-insured financial institutions, by
21 means of false and fraudulent pretenses, representations and promises that would cause a bank to part
22 with money or property.

23 **The Scheme and Artifice**

24 3. It was part of the scheme and artifice that defendants caused straw buyers to purchase
25 properties on their behalf.

26

1 4. It was further part of the scheme and artifice that defendants caused offers to purchase
2 properties to be made substantially above the sellers' asking prices. **GRIMM** and **MAZZARELLA**
3 caused the sellers to agree that the excess funds be redirected to one of their business entities under
4 the pretense of making upgrades or repairs to the properties.

5 5. It was further part of the scheme and artifice that defendants caused straw buyers to
6 apply for mortgage loans from financial institutions to purchase properties. Through these
7 transactions, defendants obtained money from financial institutions by causing money from the
8 mortgage loans to be diverted to defendants' own use and benefit.

9 6. It was further part of the scheme and artifice that defendants knowingly placed and
10 caused to be placed on the straw buyers' loan applications and supporting documentation, materially
11 false information regarding straw buyers' places of employment, income, assets, and intention to
12 occupy the properties as their primary residences which information defendants then and there well
13 knew to be false.

14 7. It was further part of the scheme and artifice that defendants paid persons to be straw
15 buyers.

16 8. It was further part of the scheme and artifice that defendants caused federally-insured
17 financial institutions to transmit money to title and escrow companies to fund the mortgage loans to
18 complete the straw buyer transactions.

19 9. It was further part of the scheme and artifice that defendants caused title and escrow
20 companies to disperse a portion of the loan money from the straw buyer transactions to companies
21 controlled by defendants **GRIMM** and **MAZZARELLA** .

22 10. It was further part of the scheme and artifice that defendants created numerous
23 limited liability companies ("LLC" or "LLC's"). Defendants named most of the LLC's after straw
24 buyers, typically using the straw buyer's first initial and last name.

25 11. It was further part of the scheme and artifice that defendants caused straw buyers to
26 sign over their interests in the properties they purchased to one of the LLC's. Defendants would not

1 pay straw buyers for the use of their identities until they transferred their interests in a property to an
2 LLC.

3 12. It was further part of the scheme and artifice that defendants opened bank accounts
4 for each of the LLC's.

5 13. It was further part of the scheme and artifice that defendants used the LLC bank
6 accounts to control the illicit proceeds of the mortgage transactions.

7 14. It was further part of the scheme and artifice that once defendants obtained control
8 over a property through a straw buyer transaction and transfer to an LLC, defendants would again sell
9 the same property from an LLC to another straw buyer at an inflated price.

10 15. It was further part of the scheme and artifice that defendants defaulted on mortgage
11 payments on many of the mortgage loans which caused the related properties to go into foreclosure.

12 Bank Fraud

13 16. On or about the dates identified below, in the Federal District of Nevada, the
14 defendants, for the purpose of executing and attempting to execute the above-described scheme and
15 artifice, did knowingly cause to be submitted to the federally-insured financial institutions identified
16 below, loan applications containing false and fraudulent pretenses, representations and promises in
17 order to cause the financial institutions to loan money to fund the purchase of the properties identified
18 below, with the submission of each loan application and supporting documentation constituting a
19 separate violation of Title 18, United States Code, Sections 1344 and 2:

20	<u>Count</u>	<u>Defendants</u>	<u>Date</u>	<u>Property</u>	<u>Financial Institution</u>
21	2	Steven W. Grimm Eve E. Mazzarella	12/26/06	1408 S. 6 th St. Las Vegas, Nevada	Ohio Savings Bank
22	3	Steven W. Grimm Eve E. Mazzarella	3/28/07	6609 Alta Dr. Las Vegas, Nevada	Ohio Savings Bank
23	4	Steven W. Grimm Eve E. Mazzarella	4/9/07	2701 Shady Pond Las Vegas, Nevada	Ohio Savings Bank
24	5	Steven W. Grimm Eve E. Mazzarella	4/12/07	1800 S. 16 th St. Las Vegas, Nevada	Ohio Savings Bank

<u>Count</u>	<u>Defendants</u>	<u>Date</u>	<u>Property</u>	<u>Financial Institution</u>
6	Steven W. Grimm Eve E. Mazzarella	4/25/07	3228 Dusty Daylight Ct. Henderson, Nevada	Am Trust Bank
7	Steven W. Grimm Eve E. Mazzarella	6/15/07	1729 Rolling Hills Dr., Las Vegas, Nevada	Am Trust Bank
8	Steven W. Grimm Eve E. Mazzarella Melissa R. Beecroft	8/21/06	1311 5 th Place Las Vegas, Nevada	BNC Mortgage, Inc., a subsidiary of Lehman Brothers
9	Steven W. Grimm Eve E. Mazzarella Melissa R. Beecroft Christina R. Thompson	3/29/05	6310 W. Azure Dr. Las Vegas, Nevada	BNC Mortgage, Inc., a subsidiary of Lehman Brothers
10	Steven W. Grimm Eve E. Mazzarella Melissa R. Beecroft Christina R. Thompson	9/13/05	9360 Red Rose Ave. Las Vegas, Nevada	BNC Mortgage, Inc., a subsidiary of Lehman Brothers
11	Steven W. Grimm Eve E. Mazzarella Melissa R. Beecroft Christina R. Thompson Amy R. Ortiz	2/13/04	9570 Rosada Way Las Vegas, Nevada	WMC Mortgage Corp., a subsidiary of G.E. Money Bank
12	Steven W. Grimm Eve E. Mazzarella Melissa R. Beecroft Amy R. Ortiz	6/24/05	8512 Summer Vista Ave. Las Vegas, Nevada	BNC Mortgage, Inc., a subsidiary of Lehman Brothers
13	Steven W. Grimm Eve E. Mazzarella Amy R. Ortiz	3/31/06	6004 Chessington Ave. Las Vegas, Nevada	Greenpoint Mortgage, a subsidiary of Capital One
14	Steven W. Grimm Eve E. Mazzarella Melissa R. Beecroft Jyothi Panikkar	11/15/05	1752 Clear River Falls Ln. Las Vegas, Nevada	BNC Mortgage, Inc., a subsidiary of Lehman Brothers

COUNT FIFTEEN
Conspiracy to Commit Money Laundering

1. The allegations set forth in the introduction and counts one and two to this Indictment are re-alleged and incorporated by reference as though fully set forth herein.

1 2. From in or about 2003, to on or about March 12, 2008, in the State and Federal District
2 of Nevada and elsewhere,

3 **STEVEN W. GRIMM,**
4 **EVE. E. MAZZARELLA,**
5 **MELISSA BEECROFT,**
6 **CHRISTINA R. THOMPSON,**
AMY ORTIZ, and
JYOTHI PANIKKAR,

7 defendants herein, did knowingly combine, conspire, confederate, and agree with each other, and with
8 others to known and unknown to the grand jury to commit the following offenses:

9 a. To conduct financial transactions, in and affecting interstate and foreign
10 commerce, involving the proceeds of specified unlawful activities, to wit: bank fraud, mail fraud, and
11 wire fraud, with the intent to promote the carrying on of such specified unlawful activities, and
12 knowing that the property involved in the transactions represented the proceeds of some form of
13 unlawful activity, in violation of 18 U.S.C. § 1956(a)(1)(A)(i); and

14 b. To conduct financial transactions, in and affecting interstate and foreign
15 commerce, involving the proceeds of specified unlawful activities, to wit: bank fraud, mail fraud, and
16 wire fraud, knowing that the transactions were designed in whole and in part to conceal and disguise
17 the nature, source, ownership, and control of the proceeds of such specified unlawful activities, and
18 knowing that the property involved in the transactions represented the proceeds of some form of
19 unlawful activity, in violation of 18 U.S.C. § 1956(a)(1)(B)(i);

20 c. To knowingly engage in monetary transactions, that is the deposit, withdrawal
21 and transfer of funds and monetary instruments by, through and to a financial institution, in and
22 affecting interstate commerce, in criminally derived property of a value greater than \$10,000, such
23 property having been derived from specified unlawful activities, to wit: bank fraud, mail fraud, and
24 wire fraud, knowing such transactions involved criminally derived property, in violation of Title 18,
25 United States Codes, Section 1957.

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Objects, Manner and Means of the Conspiracy

3. The objects of the money laundering conspiracy were for defendants **GRIMM** and **MAZZARELLA** to obtain money from the straw buyer mortgage loan transactions and to conceal receipt of those monies.

4. One of the manner and means by which defendant **GRIMM** obtained money from the straw buyer transactions was that defendant **GRIMM** caused loan officers and mortgage brokers to agree that if defendant **GRIMM** would send his straw buyers to those individuals to obtain their mortgage loans, they would return a percentage of their commissions and fees to defendant **GRIMM** in the form of kickbacks. Defendants **BEECROFT, THOMPSON, ORTIZ** and **PANIKKAR** agreed with defendant **GRIMM** that they would return a percentage of their commissions and fees from defendant **GRIMM**'s straw buyers' transactions.

5. Defendants **BEECROFT, THOMPSON, ORTIZ** and **PANIKKAR** used other individuals to receive commission checks from the straw buyer transactions. These individuals cashed the commission checks, kept a portion for themselves and either turned over the remainder to defendant **GRIMM**, or returned it to the co-conspirator who gave them the check who in turn gave the remainder to defendant **GRIMM**.

6. Another manner in which defendants **GRIMM** and **MAZZARELLA** received monies from the straw buyer transactions was to cause third-party disbursements to be made to shell companies under the control of defendants **GRIMM** and **MAZZARELLA**.

7. After defendants **GRIMM** and **MAZZARELLA** caused money to be disbursed from closing to business entities they controlled, they moved money between multiple accounts, but would ultimately deposit the money into their personal bank accounts. These transactions were often greater than \$10,000.

All in violation of Title 18, United States Code, Section 1956(h).

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COUNT SIXTEEN

Engaging in Monetary Transactions in Property Derived From Specified Unlawful Activity

1. The allegations set forth in the introduction and counts one through three to this Indictment are re-alleged and incorporated by reference as though fully set forth herein.

2. On or about January 9, 2007, in the State and Federal District of Nevada,

EVE E. MAZZARELLA,

defendant herein, did knowingly engage and attempt to engage in monetary transactions by, through, and to a financial institution, affecting interstate commerce, in criminally derived property of a value greater than \$10,000, that is, a \$160,000 deposit, such property having been derived from a specified unlawful activity, that is, Mail Fraud, in violation of Title 18, United States Code, Section 1341; Wire Fraud, in violation of Title 18, United States Code, Section 1343; and Bank Fraud, in violation of Title 18, United States Code, Section 1344, knowing such transaction involved criminally derived property, all in violation of Title 18, United States Code, Section 1957.

COUNT SEVENTEEN

Aid and Assist with Fraud and False Statements

From on or about January 26, 2007, to on or about June 15, 2007, in the State and Federal District of Nevada and elsewhere,

AMY R. ORTIZ,

the defendant herein, did willfully aid and assist in, and procure, counsel, and advise the preparation and presentation to the Internal Revenue Service of Forms 1099-Misc. for the calendar year 2006, which were false and fraudulent as to material matters, to wit: defendant filed two Forms 1099-Misc. that falsely attributed \$122,285 in income to two individuals to whom defendant had not paid that

1 income to conceal from the Internal Revenue Service that defendant had paid \$125,243.58 to
2 **MELISSA BEECROFT**, all in violation of Title 26, United States Code, Section 7206(2).

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FORFEITURE ALLEGATION ONE
Conspiracy to Commit Bank Fraud, Mail Fraud, and Wire Fraud

1. The allegations of Count One of this Indictment are hereby realleged and incorporated herein by reference for the purpose of alleging forfeiture pursuant to the provision of Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

2. Upon a conviction of the felony offenses charged in Count One of this Indictment,

**STEVEN W. GRIMM,
EVE E. MAZZARELLA,
MELISSA R. BEECROFT,
CHRISTINA R. THOMPSON,
AMY R. ORTIZ, and
JYOTHI PANIKKAR,**

defendants herein, shall forfeit to the United States of America, any property constituting, or derived from, proceeds traceable to a conspiracy in violation of Title 18, United States Code, Section 1349 to commit violations of Title 18, United States Code, Section 1341; Title 18, United States Code, Section 1343; and Title 18, United States Code, Section 1344 up to \$107,000,000.00 in United States Currency.

3. If any property being subject to forfeiture pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), as a result of any act or omission of the defendants –

- 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 place beyond the jurisdiction of the court;
- d. has been substantially diminished in value, or;
- e. has been commingled with other property that cannot be divided without difficulty;

it is the intent of the United States of America to seek forfeiture of any properties of the defendants up to \$107,000,000 in United States Currency.

1 All pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States
2 Code, Section 2461(c) and Title 21, United States Code, Section 853(p).

3 **FORFEITURE ALLEGATION TWO**

4 Conspiracy to Commit Bank Fraud, Mail Fraud, and Wire Fraud

5 1. The allegations of Count One of this Indictment are hereby realleged and incorporated
6 herein by reference for the purpose of alleging forfeiture pursuant to the provision of Title 18, United
7 States Code, Section 982(a)(2)(A).

8 2. Upon a conviction of the felony offenses charged in Count One of this Indictment,

9 **STEVEN W. GRIMM,**
10 **EVE E. MAZZARELLA,**
11 **MELISSA R. BEECROFT,**
12 **CHRISTINA R. THOMPSON,**
13 **AMY R. ORTIZ, and**
14 **JYOTHI PANIKKAR,**

15 defendants herein, shall forfeit to the United States of America, any property constituting, or derived
16 from, proceeds obtained directly or indirectly, as the result of a conspiracy in violation of Title 18,
17 United States Code, Section 1349 to commit violations of Title 18, United States Code, Section 1341;
18 Title 18, United States Code, Section 1343; and Title 18, United States Code, Section 1344 up to
19 \$107,000,000.00 in United States Currency.

20 3. If any property being subject to forfeiture pursuant to Title 18, United States Code,
21 Section 982(a)(2)(A), as a result of any act or omission of the defendants –

- 22 a. cannot be located upon the exercise of due diligence;
- 23 b. has been transferred or sold to, or deposited with, a third party;
- 24 c. has been place beyond the jurisdiction of the court;
- 25 d. has been substantially diminished in value, or;
- 26 e. has been commingled with other property that cannot be divided without
difficulty;

1 it is the intent of the United States of America to seek forfeiture of any properties of the defendants up
2 to \$107,000,000.00 in United States Currency.

3 All pursuant to Title 18, United States Code, Sections 982(a)(2)(A) and 982(b) and Title 21,
4 United States Code, Section 853(p).

5 **FORFEITURE ALLEGATION THREE**

6 **Bank Fraud**

7 1. The allegations of Count Two of this Indictment are hereby realleged and incorporated
8 herein by reference for the purpose of alleging forfeiture pursuant to the provision of Title 18, United
9 States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

10 2. Upon a conviction of the felony offenses charged in Count Two of this Indictment,

11 **STEVEN W. GRIMM,**
12 **EVE E. MAZZARELLA,**
13 **MELISSA R. BEECROFT,**
14 **CHRISTINA R. THOMPSON,**
AMY R. ORTIZ, and
JYOTHI PANIKKAR,

15 defendants herein, shall forfeit to the United States of America, any property constituting, or derived
16 from, proceeds traceable to a violation of Title 18, United States Code, Section 1344 or a conspiracy
17 to commit such an offense up to \$590,000.00 in United States Currency.

18 3. If any property being subject to forfeiture pursuant to Title 18, United States Code,
19 Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), as a result of any act or
20 omission of the defendants –

- 21 a. cannot be located upon the exercise of due diligence;
22 b. has been transferred or sold to, or deposited with, a third party;
23 c. has been place beyond the jurisdiction of the court;
24 d. has been substantially diminished in value, or;
25 e. has been commingled with other property that cannot be divided without
26 difficulty;

1 it is the intent of the United States of America to seek forfeiture of any properties of the defendants
2 up to \$590,000.00 in United States Currency.

3 All pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States
4 Code, Section 2461(c); Title 18, United States Code, Section 1344; and Title 21, United States Code,
5 Section 853(p).

6 **FORFEITURE ALLEGATION FOUR**
7 Bank Fraud

8 1. The allegations of Count Two of this Indictment are hereby realleged and incorporated
9 herein by reference for the purpose of alleging forfeiture pursuant to the provision of Title 18, United
10 States Code, Section 982(a)(2)(A).

11 2. Upon a conviction of the felony offenses charged in Count Two of this Indictment,

12 **STEVEN W. GRIMM,**
13 **EVE E. MAZZARELLA,**
14 **MELISSA R. BEECROFT,**
15 **CHRISTINA R. THOMPSON,**
AMY R. ORTIZ, and
JYOTHI PANIKKAR,

16 defendants herein, shall forfeit to the United States of America, any property constituting, or derived
17 from, proceeds obtained directly or indirectly, as the result of a violation of Title 18, United States
18 Code, Section 1344 up to \$590,000.00 in United States Currency.

19 3. If any property being subject to forfeiture pursuant to Title 18, United States Code,
20 Section 982(a)(2)(A), as a result of any act or omission of the defendants –

- 21 a. cannot be located upon the exercise of due diligence;
- 22 b. has been transferred or sold to, or deposited with, a third party;
- 23 c. has been place beyond the jurisdiction of the court;
- 24 d. has been substantially diminished in value, or;
- 25 e. has been commingled with other property that cannot be divided without
- 26 difficulty;

1 it is the intent of the United States of America to seek forfeiture of any properties of the defendants
2 up to \$590,000.00 in United States Currency.

3 All pursuant to Title 18, United States Code, Sections 982(a)(2)(A) and 982(b); Title 18,
4 United States Code, Section 1344; and Title 21, United States Code, Section 853(p).

5 **FORFEITURE ALLEGATION FIVE**
6 **Bank Fraud**

7 1. The allegations of Count Three of this Indictment are hereby realleged and
8 incorporated herein by reference for the purpose of alleging forfeiture pursuant to the provision of Title
9 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

10 2. Upon a conviction of the felony offenses charged in Count Three of this Indictment,

11 **STEVEN W. GRIMM,**
12 **EVE E. MAZZARELLA,**
13 **MELISSA R. BEECROFT,**
14 **CHRISTINA R. THOMPSON,**
AMY R. ORTIZ, and
JYOTHI PANIKKAR,

15 defendants herein, shall forfeit to the United States of America, any property constituting, or derived
16 from, proceeds traceable to a violation of Title 18, United States Code, Section 1344 or a conspiracy
17 to commit such an offense up to \$268,000.00 in United States Currency.

18 3. If any property being subject to forfeiture pursuant to Title 18, United States Code,
19 Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), as a result of any act or
20 omission of the defendants –

- 21 a. cannot be located upon the exercise of due diligence;
22 b. has been transferred or sold to, or deposited with, a third party;
23 c. has been place beyond the jurisdiction of the court;
24 d. has been substantially diminished in value, or;
25 e. has been commingled with other property that cannot be divided without
26 difficulty;

1 it is the intent of the United States of America to seek forfeiture of any properties of the defendants
2 up to \$268,000.00 in United States Currency.

3 All pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States
4 Code, Section 2461(c); Title 18, United States Code, Section 1344; and Title 21, United States Code,
5 Section 853(p).

6 **FORFEITURE ALLEGATION SIX**
7 Bank Fraud

8 1. The allegations of Count Three of this Indictment are hereby realleged and
9 incorporated herein by reference for the purpose of alleging forfeiture pursuant to the provision of Title
10 18, United States Code, Section 982(a)(2)(A).

11 2. Upon a conviction of the felony offenses charged in Count Three of this Indictment,

12 **STEVEN W. GRIMM,**
13 **EVE E. MAZZARELLA,**
14 **MELISSA R. BEECROFT,**
15 **CHRISTINA R. THOMPSON,**
AMY R. ORTIZ, and
JYOTHI PANIKKAR,

16 defendants herein, shall forfeit to the United States of America, any property constituting, or derived
17 from, proceeds obtained directly or indirectly, as the result of a violation of Title 18, United States
18 Code, Section 1344 up to \$268,000.00 in United States Currency.

19 3. If any property being subject to forfeiture pursuant to Title 18, United States Code,
20 Section 982(a)(2)(A), as a result of any act or omission of the defendants –

- 21 a. cannot be located upon the exercise of due diligence;
22 b. has been transferred or sold to, or deposited with, a third party;
23 c. has been place beyond the jurisdiction of the court;
24 d. has been substantially diminished in value, or;
25 e. has been commingled with other property that cannot be divided without
26 difficulty;

1 it is the intent of the United States of America to seek forfeiture of any properties of the defendants
2 up to \$268,000.00 in United States Currency.

3 All pursuant to Title 18, United States Code, Sections 982(a)(2)(A) and 982(b); Title 18,
4 United States Code, Section 1344; and Title 21, United States Code, Section 853(p).

5 **FORFEITURE ALLEGATION SEVEN**
6 Bank Fraud

7 1. The allegations of Count Four of this Indictment are hereby realleged and incorporated
8 herein by reference for the purpose of alleging forfeiture pursuant to the provision of Title 18, United
9 States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

10 2. Upon a conviction of the felony offenses charged in Count Four of this Indictment,

11 **STEVEN W. GRIMM,**
12 **EVE E. MAZZARELLA,**
13 **MELISSA R. BEECROFT,**
14 **CHRISTINA R. THOMPSON,**
AMY R. ORTIZ, and
JYOTHI PANIKKAR,

15 defendants herein, shall forfeit to the United States of America, any property constituting, or derived
16 from, proceeds traceable to a violation of Title 18, United States Code, Section 1344 or a conspiracy
17 to commit such an offense up to \$510,000.00 in United States Currency.

18 3. If any property being subject to forfeiture pursuant to Title 18, United States Code,
19 Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), as a result of any act or
20 omission of the defendants –

- 21 a. cannot be located upon the exercise of due diligence;
22 b. has been transferred or sold to, or deposited with, a third party;
23 c. has been place beyond the jurisdiction of the court;
24 d. has been substantially diminished in value, or;
25 e. has been commingled with other property that cannot be divided without
26 difficulty;

1 it is the intent of the United States of America to seek forfeiture of any properties of the defendants up
2 to \$510,000.00 in United States Currency.

3 All pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States
4 Code, Section 2461(c); Title 18, United States Code, Section 1344; and Title 21, United States Code,
5 Section 853(p).

6 **FORFEITURE ALLEGATION EIGHT**
7 **Bank Fraud**

8 1. The allegations of Count Four of this Indictment are hereby realleged and incorporated
9 herein by reference for the purpose of alleging forfeiture pursuant to the provision of Title 18, United
10 States Code, Section 982(a)(2)(A).

11 2. Upon a conviction of the felony offenses charged in Count Four of this Indictment,

12 **STEVEN W. GRIMM,**
13 **EVE E. MAZZARELLA,**
14 **MELISSA R. BEECROFT,**
15 **CHRISTINA R. THOMPSON,**
16 **AMY R. ORTIZ, and**
17 **JYOTHI PANIKKAR,**

18 defendants herein, shall forfeit to the United States of America, any property constituting, or derived
19 from, proceeds obtained directly or indirectly, as the result of a violation of Title 18, United States
20 Code, Section 1344 up to \$510,000.00 in United States Currency.

21 3. If any property being subject to forfeiture pursuant to Title 18, United States Code,
22 Section 982(a)(2)(A), as a result of any act or omission of the defendants –

- 23 a. cannot be located upon the exercise of due diligence;
24 b. has been transferred or sold to, or deposited with, a third party;
25 c. has been place beyond the jurisdiction of the court;
26 d. has been substantially diminished in value, or;
e. has been commingled with other property that cannot be divided without
difficulty;

1 it is the intent of the United States of America to seek forfeiture of any properties of the defendants
2 up to \$510,000.00 in United States Currency.

3 All pursuant to Title 18, United States Code, Sections 982(a)(2)(A) and 982(b); Title 18,
4 United States Code, Section 1344; and Title 21, United States Code, Section 853(p).

5 **FORFEITURE ALLEGATION NINE**
6 **Bank Fraud**

7 1. The allegations of Count Five of this Indictment are hereby realleged and incorporated
8 herein by reference for the purpose of alleging forfeiture pursuant to the provision of Title 18, United
9 States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

10 2. Upon a conviction of the felony offenses charged in Count Five of this Indictment,

11 **STEVEN W. GRIMM,**
12 **EVE E. MAZZARELLA,**
13 **MELISSA R. BEECROFT,**
14 **CHRISTINA R. THOMPSON,**
AMY R. ORTIZ, and
JYOTHI PANIKKAR,

15 defendants herein, shall forfeit to the United States of America, any property constituting, or derived
16 from, proceeds traceable to a violation of Title 18, United States Code, Section 1344 or a conspiracy
17 to commit such an offense up to \$485,000.00 in United States Currency.

18 3. If any property being subject to forfeiture pursuant to Title 18, United States Code,
19 Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), as a result of any act or
20 omission of the defendants –

- 21 a. cannot be located upon the exercise of due diligence;
22 b. has been transferred or sold to, or deposited with, a third party;
23 c. has been place beyond the jurisdiction of the court;
24 d. has been substantially diminished in value, or;
25 e. has been commingled with other property that cannot be divided without
26 difficulty;

1 it is the intent of the United States of America to seek forfeiture of any properties of the defendants up
2 to \$485,000.00 in United States Currency.

3 All pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States
4 Code, Section 2461(c); Title 18, United States Code, Section 1344; and Title 21, United States Code,
5 Section 853(p).

6 **FORFEITURE ALLEGATION TEN**
7 **Bank Fraud**

8 1. The allegations of Count Five of this Indictment are hereby realleged and incorporated
9 herein by reference for the purpose of alleging forfeiture pursuant to the provision of Title 18, United
10 States Code, Section 982(a)(2)(A).

11 2. Upon a conviction of the felony offenses charged in Count Five of this Indictment,

12 **STEVEN W. GRIMM,**
13 **EVE E. MAZZARELLA,**
14 **MELISSA R. BEECROFT,**
15 **CHRISTINA R. THOMPSON,**
AMY R. ORTIZ, and
JYOTHI PANIKKAR,

16 defendants herein, shall forfeit to the United States of America, any property constituting, or derived
17 from, proceeds obtained directly or indirectly, as the result of a violation of Title 18, United States
18 Code, Section 1344 up to \$485,000.00 in United States Currency.

19 3. If any property being subject to forfeiture pursuant to Title 18, United States Code,
20 Section 982(a)(2)(A), as a result of any act or omission of the defendants –

- 21 a. cannot be located upon the exercise of due diligence;
22 b. has been transferred or sold to, or deposited with, a third party;
23 c. has been place beyond the jurisdiction of the court;
24 d. has been substantially diminished in value, or;
25 e. has been commingled with other property that cannot be divided without
26 difficulty;

1 it is the intent of the United States of America to seek forfeiture of any properties of the defendants up
2 to \$485,000.00 in United States Currency.

3 All pursuant to Title 18, United States Code, Sections 982(a)(2)(A) and 982(b); Title 18,
4 United States Code, Section 1344; and Title 21, United States Code, Section 853(p).

5 **FORFEITURE ALLEGATION ELEVEN**
6 **Bank Fraud**

7 1. The allegations of Count Six of this Indictment are hereby realleged and incorporated
8 herein by reference for the purpose of alleging forfeiture pursuant to the provision of Title 18, United
9 States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

10 2. Upon a conviction of the felony offenses charged in Count Six of this Indictment,

11 **STEVEN W. GRIMM,**
12 **EVE E. MAZZARELLA,**
13 **MELISSA R. BEECROFT,**
14 **CHRISTINA R. THOMPSON,**
AMY R. ORTIZ, and
JYOTHI PANIKKAR,

15 defendants herein, shall forfeit to the United States of America, any property constituting, or derived
16 from, proceeds traceable to a violation of Title 18, United States Code, Section 1344 or a conspiracy
17 to commit such an offense up to \$520,000.00 in United States Currency.

18 3. If any property being subject to forfeiture pursuant to Title 18, United States Code,
19 Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), as a result of any act or
20 omission of the defendants –

- 21 a. cannot be located upon the exercise of due diligence;
22 b. has been transferred or sold to, or deposited with, a third party;
23 c. has been place beyond the jurisdiction of the court;
24 d. has been substantially diminished in value, or;
25 e. has been commingled with other property that cannot be divided without
26 difficulty;

1 it is the intent of the United States of America to seek forfeiture of any properties of the defendants up
2 to \$520,000.00 in United States Currency.

3 All pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States
4 Code, Section 2461(c); Title 18, United States Code, Section 1344; and Title 21, United States Code,
5 Section 853(p).

6 **FORFEITURE ALLEGATION TWELVE**
7 **Bank Fraud**

8 1. The allegations of Count Six of this Indictment are hereby realleged and incorporated
9 herein by reference for the purpose of alleging forfeiture pursuant to the provision of Title 18, United
10 States Code, Section 982(a)(2)(A).

11 2. Upon a conviction of the felony offenses charged in Count Six of this Indictment,

12 **STEVEN W. GRIMM,**
13 **EVE E. MAZZARELLA,**
14 **MELISSA R. BEECROFT,**
15 **CHRISTINA R. THOMPSON,**
AMY R. ORTIZ, and
JYOTHI PANIKKAR,

16 defendants herein, shall forfeit to the United States of America, any property constituting, or derived
17 from, proceeds obtained directly or indirectly, as the result of a violation of Title 18, United States
18 Code, Section 1344 up to \$520,000.00 in United States Currency.

19 3. If any property being subject to forfeiture pursuant to Title 18, United States Code,
20 Section 982(a)(2)(A), as a result of any act or omission of the defendants –

- 21 a. cannot be located upon the exercise of due diligence;
22 b. has been transferred or sold to, or deposited with, a third party;
23 c. has been place beyond the jurisdiction of the court;
24 d. has been substantially diminished in value, or;
25 e. has been commingled with other property that cannot be divided without
26 difficulty;

1 it is the intent of the United States of America to seek forfeiture of any properties of the defendants up
2 to \$520,000.00 in United States Currency.

3 All pursuant to Title 18, United States Code, Section 982(a)(2)(A) and 982(b); Title 18,
4 United States Code, Section 1344; and Title 21, United States Code, Section 853(p).

5 **FORFEITURE ALLEGATION THIRTEEN**
6 Bank Fraud

7 1. The allegations of Count Seven of this Indictment are hereby realleged and
8 incorporated herein by reference for the purpose of alleging forfeiture pursuant to the provision of Title
9 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

10 2. Upon a conviction of the felony offenses charged in Count Seven of this Indictment,

11 **STEVEN W. GRIMM,**
12 **EVE E. MAZZARELLA,**
13 **MELISSA R. BEECROFT,**
14 **CHRISTINA R. THOMPSON,**
AMY R. ORTIZ, and
JYOTHI PANIKKAR,

15 defendants herein, shall forfeit to the United States of America, any property constituting, or derived
16 from, proceeds traceable to a violation of Title 18, United States Code, Section 1344 or a conspiracy
17 to commit such an offense up to \$295,000.00 in United States Currency.

18 3. If any property being subject to forfeiture pursuant to Title 18, United States Code,
19 Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), as a result of any act or
20 omission of the defendants –

- 21 a. cannot be located upon the exercise of due diligence;
22 b. has been transferred or sold to, or deposited with, a third party;
23 c. has been place beyond the jurisdiction of the court;
24 d. has been substantially diminished in value, or;
25 e. has been commingled with other property that cannot be divided without
26 difficulty;

1 it is the intent of the United States of America to seek forfeiture of any properties of the defendants up
2 to \$295,000.00 in United States Currency.

3 All pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States
4 Code, Section 2461(c); Title 18, United States Code, Section 1344; and Title 21, United States Code,
5 Section 853(p).

6 **FORFEITURE ALLEGATION FOURTEEN**
7 **Bank Fraud**

8 1. The allegations of Count Seven of this Indictment are hereby realleged and
9 incorporated herein by reference for the purpose of alleging forfeiture pursuant to the provision of Title
10 18, United States Code, Section 982(a)(2)(A).

11 2. Upon a conviction of the felony offenses charged in Count Seven of this Indictment,

12 **STEVEN W. GRIMM,**
13 **EVE E. MAZZARELLA,**
14 **MELISSA R. BEECROFT,**
15 **CHRISTINA R. THOMPSON,**
AMY R. ORTIZ, and
JYOTHI PANIKKAR,

16 defendants herein, shall forfeit to the United States of America, any property constituting, or derived
17 from, proceeds obtained directly or indirectly, as the result of a violation of Title 18, United States
18 Code, Section 1344 up to \$295,000.00 in United States Currency.

19 3. If any property being subject to forfeiture pursuant to Title 18, United States Code,
20 Section 982(a)(2)(A), as a result of any act or omission of the defendants –

- 21 a. cannot be located upon the exercise of due diligence;
22 b. has been transferred or sold to, or deposited with, a third party;
23 c. has been place beyond the jurisdiction of the court;
24 d. has been substantially diminished in value, or;
25 e. has been commingled with other property that cannot be divided without
26 difficulty;

1 it is the intent of the United States of America to seek forfeiture of any properties of the defendants up
2 to \$295,000.00 in United States Currency.

3 All pursuant to Title 18, United States Code, Sections 982(a)(2)(A) and 982(b); Title 18,
4 United States Code, Section 1344; and Title 21, United States Code, Section 853(p).

5 **FORFEITURE ALLEGATION FIFTEEN**
6 **Bank Fraud**

7 1. The allegations of Count Eight of this Indictment are hereby realleged and
8 incorporated herein by reference for the purpose of alleging forfeiture pursuant to the provision of Title
9 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

10 2. Upon a conviction of the felony offenses charged in Count Eight of this Indictment,

11 **STEVEN W. GRIMM,**
12 **EVE E. MAZZARELLA,**
13 **MELISSA R. BEECROFT,**
14 **CHRISTINA R. THOMPSON,**
AMY R. ORTIZ, and
JYOTHI PANIKKAR,

15 defendants herein, shall forfeit to the United States of America, any property constituting, or derived
16 from, proceeds traceable to a violation of Title 18, United States Code, Section 1344 or a conspiracy
17 to commit such an offense up to \$590,000.00 in United States Currency.

18 3. If any property being subject to forfeiture pursuant to Title 18, United States Code,
19 Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), as a result of any act or
20 omission of the defendants –

- 21 a. cannot be located upon the exercise of due diligence;
22 b. has been transferred or sold to, or deposited with, a third party;
23 c. has been place beyond the jurisdiction of the court;
24 d. has been substantially diminished in value, or;
25 e. has been commingled with other property that cannot be divided without
26 difficulty;

1 it is the intent of the United States of America to seek forfeiture of any properties of the defendants up
2 to \$590,000.00 in United States Currency.

3 All pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States
4 Code, Section 2461(c); Title 18, United States Code, Section 1344; and Title 21, United States Code,
5 Section 853(p).

6 **FORFEITURE ALLEGATION SIXTEEN**
7 **Bank Fraud**

8 1. The allegations of Count Eight of this Indictment are hereby realleged and
9 incorporated herein by reference for the purpose of alleging forfeiture pursuant to the provision of Title
10 18, United States Code, Section 982(a)(2)(A).

11 2. Upon a conviction of the felony offenses charged in Count Eight of this Indictment,

12 **STEVEN W. GRIMM,**
13 **EVE E. MAZZARELLA,**
14 **MELISSA R. BEECROFT,**
15 **CHRISTINA R. THOMPSON,**
16 **AMY R. ORTIZ, and**
17 **JYOTHI PANIKKAR,**

18 defendants herein, shall forfeit to the United States of America, any property constituting, or derived
19 from, proceeds obtained directly or indirectly, as the result of a violation of Title 18, United States
20 Code, Section 1344 up to \$590,000.00 in United States Currency.

21 3. If any property being subject to forfeiture pursuant to Title 18, United States Code,
22 Section 982(a)(2)(A), as a result of any act or omission of the defendants –

- 23 a. cannot be located upon the exercise of due diligence;
24 b. has been transferred or sold to, or deposited with, a third party;
25 c. has been place beyond the jurisdiction of the court;
26 d. has been substantially diminished in value, or;
e. has been commingled with other property that cannot be divided without
difficulty;

1 it is the intent of the United States of America to seek forfeiture of any properties of the defendants up
2 to \$590,000.00 in United States Currency.

3 All pursuant to Title 18, United States Code, Sections 982(a)(2)(A) and 982(b); Title 18,
4 United States Code, Section 1344; and Title 21, United States Code, Section 853(p).

5 **FORFEITURE ALLEGATION SEVENTEEN**
6 **Bank Fraud**

7 1. The allegations of Count Nine of this Indictment are hereby realleged and incorporated
8 herein by reference for the purpose of alleging forfeiture pursuant to the provision of Title 18, United
9 States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

10 2. Upon a conviction of the felony offenses charged in Count Nine of this Indictment,

11 **STEVEN W. GRIMM,**
12 **EVE E. MAZZARELLA,**
13 **MELISSA R. BEECROFT,**
14 **CHRISTINA R. THOMPSON,**
AMY R. ORTIZ, and
JYOTHI PANIKKAR,

15 defendants herein, shall forfeit to the United States of America, any property constituting, or derived
16 from, proceeds traceable to a violation of Title 18, United States Code, Section 1344 or a conspiracy
17 to commit such an offense up to \$485,000.00 in United States Currency.

18 3. If any property being subject to forfeiture pursuant to Title 18, United States Code,
19 Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), as a result of any act or
20 omission of the defendants –

- 21 a. cannot be located upon the exercise of due diligence;
22 b. has been transferred or sold to, or deposited with, a third party;
23 c. has been place beyond the jurisdiction of the court;
24 d. has been substantially diminished in value, or;
25 e. has been commingled with other property that cannot be divided without
26 difficulty;

1 it is the intent of the United States of America to seek forfeiture of any properties of the defendants up
2 to \$485,000.00 in United States Currency.

3 All pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States
4 Code, Section 2461(c); Title 18, United States Code, Section 1344; and Title 21, United States Code,
5 Section 853(p).

6 **FORFEITURE ALLEGATION EIGHTEEN**
7 Bank Fraud

8 1. The allegations of Count Nine of this Indictment are hereby realleged and incorporated
9 herein by reference for the purpose of alleging forfeiture pursuant to the provision of Title 18, United
10 States Code, Section 982(a)(2)(A).

11 2. Upon a conviction of the felony offenses charged in Count Nine of this Indictment,

12 **STEVEN W. GRIMM,**
13 **EVE E. MAZZARELLA,**
14 **MELISSA R. BEECROFT,**
15 **CHRISTINA R. THOMPSON,**
16 **AMY R. ORTIZ, and**
17 **JYOTHI PANIKKAR,**

18 defendants herein, shall forfeit to the United States of America, any property constituting, or derived
19 from, proceeds obtained directly or indirectly, as the result of a violation of Title 18, United States
20 Code, Section 1344 up to \$485,000.00 in United States Currency.

21 3. If any property being subject to forfeiture pursuant to Title 18, United States Code,
22 Section 982(a)(2)(A), as a result of any act or omission of the defendants –

- 23 a. cannot be located upon the exercise of due diligence;
24 b. has been transferred or sold to, or deposited with, a third party;
25 c. has been place beyond the jurisdiction of the court;
26 d. has been substantially diminished in value, or;
e. has been commingled with other property that cannot be divided without
difficulty;

1 it is the intent of the United States of America to seek forfeiture of any properties of the defendants up
2 to \$485,000.00 in United States Currency.

3 All pursuant to Title 18, United States Code, Sections 982(a)(2)(A) and 982(b); Title 18,
4 United States Code, Section 1344; and Title 21, United States Code, Section 853(p).

5 **FORFEITURE ALLEGATION NINETEEN**
6 Bank Fraud

7 1. The allegations of Count Ten of this Indictment are hereby realleged and incorporated
8 herein by reference for the purpose of alleging forfeiture pursuant to the provision of Title 18, United
9 States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

10 2. Upon a conviction of the felony offenses charged in Count Ten of this Indictment,

11 **STEVEN W. GRIMM,**
12 **EVE E. MAZZARELLA,**
13 **MELISSA R. BEECROFT,**
14 **CHRISTINA R. THOMPSON,**
AMY R. ORTIZ, and
JYOTHI PANIKKAR,

15 defendants herein, shall forfeit to the United States of America, any property constituting, or derived
16 from, proceeds traceable to a violation of Title 18, United States Code, Section 1344 or a conspiracy
17 to commit such an offense up to \$368,500.00 in United States Currency.

18 3. If any property being subject to forfeiture pursuant to Title 18, United States Code,
19 Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), as a result of any act or
20 omission of the defendants –

- 21 a. cannot be located upon the exercise of due diligence;
22 b. has been transferred or sold to, or deposited with, a third party;
23 c. has been place beyond the jurisdiction of the court;
24 d. has been substantially diminished in value, or;
25 e. has been commingled with other property that cannot be divided without
26 difficulty;

1 it is the intent of the United States of America to seek forfeiture of any properties of the defendants up
2 to \$368,500.00 in United States Currency.

3 All pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States
4 Code, Section 2461(c); Title 18, United States Code, Section 1344; and Title 21, United States Code,
5 Section 853(p).

6 **FORFEITURE ALLEGATION TWENTY**
7 Bank Fraud

8 1. The allegations of Count Ten of this Indictment are hereby realleged and incorporated
9 herein by reference for the purpose of alleging forfeiture pursuant to the provision of Title 18, United
10 States Code, Section 982(a)(2)(A).

11 2. Upon a conviction of the felony offenses charged in Count Ten of this Indictment,

12 **STEVEN W. GRIMM,**
13 **EVE E. MAZZARELLA,**
14 **MELISSA R. BEECROFT,**
15 **CHRISTINA R. THOMPSON,**
16 **AMY R. ORTIZ, and**
17 **JYOTHI PANIKKAR,**

18 defendants herein, shall forfeit to the United States of America, any property constituting, or derived
19 from, proceeds obtained directly or indirectly, as the result of a violation of Title 18, United States
20 Code, Section 1344 up to \$368,500.00 in United States Currency.

21 3. If any property being subject to forfeiture pursuant to Title 18, United States Code,
22 Section 982(a)(2)(A), as a result of any act or omission of the defendants –

- 23 a. cannot be located upon the exercise of due diligence;
24 b. has been transferred or sold to, or deposited with, a third party;
25 c. has been place beyond the jurisdiction of the court;
26 d. has been substantially diminished in value, or;
e. has been commingled with other property that cannot be divided without
difficulty;

1 it is the intent of the United States of America to seek forfeiture of any properties of the defendants up
2 to \$368,500.00 in United States Currency.

3 All pursuant to Title 18, United States Code, Sections 982(a)(2)(A) and 982(b); Title 18,
4 United States Code, Section 1344; and Title 21, United States Code, Section 853(p).

5 **FORFEITURE ALLEGATION TWENTY-ONE**
6 **Bank Fraud**

7 1. The allegations of Count Eleven of this Indictment are hereby realleged and
8 incorporated herein by reference for the purpose of alleging forfeiture pursuant to the provision of Title
9 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

10 2. Upon a conviction of the felony offenses charged in Count Eleven of this Indictment,

11 **STEVEN W. GRIMM,**
12 **EVE E. MAZZARELLA,**
13 **MELISSA R. BEECROFT,**
14 **CHRISTINA R. THOMPSON,**
AMY R. ORTIZ, and
JYOTHI PANIKKAR,

15 defendants herein, shall forfeit to the United States of America, any property constituting, or derived
16 from, proceeds traceable to a violation of Title 18, United States Code, Section 1344 or a conspiracy
17 to commit such an offense up to \$589,000.00 in United States Currency.

18 3. If any property being subject to forfeiture pursuant to Title 18, United States Code,
19 Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), as a result of any act or
20 omission of the defendants –

- 21 a. cannot be located upon the exercise of due diligence;
22 b. has been transferred or sold to, or deposited with, a third party;
23 c. has been place beyond the jurisdiction of the court;
24 d. has been substantially diminished in value, or;
25 e. has been commingled with other property that cannot be divided without
26 difficulty;

1 it is the intent of the United States of America to seek forfeiture of any properties of the defendants up
2 to \$589,000.00 in United States Currency.

3 All pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States
4 Code, Section 2461(c); Title 18, United States Code, Section 1344; and Title 21, United States Code,
5 Section 853(p).

6 **FORFEITURE ALLEGATION TWENTY-TWO**
7 **Bank Fraud**

8 1. The allegations of Count Eleven of this Indictment are hereby realleged and
9 incorporated herein by reference for the purpose of alleging forfeiture pursuant to the provision of Title
10 18, United States Code, Section 982(a)(2)(A).

11 2. Upon a conviction of the felony offenses charged in Count Eleven of this Indictment,

12 **STEVEN W. GRIMM,**
13 **EVE E. MAZZARELLA,**
14 **MELISSA R. BEECROFT,**
15 **CHRISTINA R. THOMPSON,**
16 **AMY R. ORTIZ, and**
17 **JYOTHI PANIKKAR,**

18 defendants herein, shall forfeit to the United States of America, any property constituting, or derived
19 from, proceeds obtained directly or indirectly, as the result of a violation of Title 18, United States
20 Code, Section 1344 up to \$589,000.00 in United States Currency.

21 3. If any property being subject to forfeiture pursuant to Title 18, United States Code,
22 Section 982(a)(2)(A), as a result of any act or omission of the defendants –

- 23 a. cannot be located upon the exercise of due diligence;
24 b. has been transferred or sold to, or deposited with, a third party;
25 c. has been place beyond the jurisdiction of the court;
26 d. has been substantially diminished in value, or;
e. has been commingled with other property that cannot be divided without
difficulty;

1 it is the intent of the United States of America to seek forfeiture of any properties of the defendants up
2 to \$589,000.00 in United States Currency.

3 All pursuant to Title 18, United States Code, Sections 982(a)(2)(A) and 982(b); Title 18,
4 United States Code, Section 1344; and Title 21, United States Code, Section 853(p).

5 **FORFEITURE ALLEGATION TWENTY-THREE**
6 **Bank Fraud**

7 1. The allegations of Count Twelve of this Indictment are hereby realleged and
8 incorporated herein by reference for the purpose of alleging forfeiture pursuant to the provision of Title
9 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

10 2. Upon a conviction of the felony offenses charged in Count Twelve of this Indictment,

11 **STEVEN W. GRIMM,**
12 **EVE E. MAZZARELLA,**
13 **MELISSA R. BEECROFT,**
14 **CHRISTINA R. THOMPSON,**
AMY R. ORTIZ, and
JYOTHI PANIKKAR,

15 defendants herein, shall forfeit to the United States of America, any property constituting, or derived
16 from, proceeds traceable to a violation of Title 18, United States Code, Section 1344 or a conspiracy
17 to commit such an offense up to \$430,000.00 in United States Currency.

18 3. If any property being subject to forfeiture pursuant to Title 18, United States Code,
19 Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), as a result of any act or
20 omission of the defendants –

- 21 a. cannot be located upon the exercise of due diligence;
22 b. has been transferred or sold to, or deposited with, a third party;
23 c. has been place beyond the jurisdiction of the court;
24 d. has been substantially diminished in value, or;
25 e. has been commingled with other property that cannot be divided without
26 difficulty;

1 it is the intent of the United States of America to seek forfeiture of any properties of the defendants up
2 to \$430,000.00 in United States Currency.

3 All pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States
4 Code, Section 2461(c); Title 18, United States Code, Section 1344; and Title 21, United States Code,
5 Section 853(p).

6 **FORFEITURE ALLEGATION TWENTY-FOUR**
7 **Bank Fraud**

8 1. The allegations of Count Twelve of this Indictment are hereby realleged and
9 incorporated herein by reference for the purpose of alleging forfeiture pursuant to the provision of Title
10 18, United States Code, Section 982(a)(2)(A).

11 2. Upon a conviction of the felony offenses charged in Count Twelve of this Indictment,

12 **STEVEN W. GRIMM,**
13 **EVE E. MAZZARELLA,**
14 **MELISSA R. BEECROFT,**
15 **CHRISTINA R. THOMPSON,**
AMY R. ORTIZ, and
JYOTHI PANIKKAR,

16 defendants herein, shall forfeit to the United States of America, any property constituting, or derived
17 from, proceeds obtained directly or indirectly, as the result of a violation of Title 18, United States
18 Code, Section 1344 up to \$430,000.00 in United States Currency.

19 3. If any property being subject to forfeiture pursuant to Title 18, United States Code,
20 Section 982(a)(2)(A), as a result of any act or omission of the defendants –

- 21 a. cannot be located upon the exercise of due diligence;
- 22 b. has been transferred or sold to, or deposited with, a third party;
- 23 c. has been place beyond the jurisdiction of the court;
- 24 d. has been substantially diminished in value, or;
- 25 e. has been commingled with other property that cannot be divided without
- 26 difficulty;

1 it is the intent of the United States of America to seek forfeiture of any properties of the defendants up
2 to \$430,000.00 in United States Currency.

3 All pursuant to Title 18, United States Code, Sections 982(a)(2)(A) and 982(b); Title 18,
4 United States Code, Section 1344; and Title 21, United States Code, Section 853(p).

5 **FORFEITURE ALLEGATION TWENTY-FIVE**
6 **Bank Fraud**

7 1. The allegations of Count Thirteen of this Indictment are hereby realleged and
8 incorporated herein by reference for the purpose of alleging forfeiture pursuant to the provision of Title
9 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

10 2. Upon a conviction of the felony offenses charged in Count Thirteen of this Indictment,

11 **STEVEN W. GRIMM,**
12 **EVE E. MAZZARELLA,**
13 **MELISSA R. BEECROFT,**
14 **CHRISTINA R. THOMPSON,**
AMY R. ORTIZ, and
JYOTHI PANIKKAR,

15 defendants herein, shall forfeit to the United States of America, any property constituting, or derived
16 from, proceeds traceable to a violation of Title 18, United States Code, Section 1344 or a conspiracy
17 to commit such an offense up to \$880,000.00 in United States Currency.

18 3. If any property being subject to forfeiture pursuant to Title 18, United States Code,
19 Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), as a result of any act or
20 omission of the defendants –

- 21 a. cannot be located upon the exercise of due diligence;
22 b. has been transferred or sold to, or deposited with, a third party;
23 c. has been place beyond the jurisdiction of the court;
24 d. has been substantially diminished in value, or;
25 e. has been commingled with other property that cannot be divided without
26 difficulty;

1 it is the intent of the United States of America to seek forfeiture of any properties of the defendants up
2 to \$880,000.00 in United States Currency.

3 All pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States
4 Code, Section 2461(c); Title 18, United States Code, Section 1344; and Title 21, United States Code,
5 Section 853(p).

6 **FORFEITURE ALLEGATION TWENTY-SIX**
7 Bank Fraud

8 1. The allegations of Count Thirteen of this Indictment are hereby realleged and
9 incorporated herein by reference for the purpose of alleging forfeiture pursuant to the provision of Title
10 18, United States Code, Section 982(a)(2)(A).

11 2. Upon a conviction of the felony offenses charged in Count Thirteen of this Indictment,

12 **STEVEN W. GRIMM,**
13 **EVE E. MAZZARELLA,**
14 **MELISSA R. BEECROFT,**
15 **CHRISTINA R. THOMPSON,**
AMY R. ORTIZ, and
JYOTHI PANIKKAR,

16 defendants herein, shall forfeit to the United States of America, any property constituting, or derived
17 from, proceeds obtained directly or indirectly, as the result of a violation of Title 18, United States
18 Code, Section 1344 up to \$880,000.00 in United States Currency.

19 3. If any property being subject to forfeiture pursuant to Title 18, United States Code,
20 Section 982(a)(2)(A), as a result of any act or omission of the defendants –

- 21 a. cannot be located upon the exercise of due diligence;
22 b. has been transferred or sold to, or deposited with, a third party;
23 c. has been place beyond the jurisdiction of the court;
24 d. has been substantially diminished in value, or;
25 e. has been commingled with other property that cannot be divided without
26 difficulty;

1 it is the intent of the United States of America to seek forfeiture of any properties of the defendants up
2 to \$880,000.00 in United States Currency.

3 All pursuant to Title 18, United States Code, Sections 982(a)(2)(A) and 982(b); Title 18,
4 United States Code, Section 1344; and Title 21, United States Code, Section 853(p).

5 **FORFEITURE ALLEGATION TWENTY-SEVEN**
6 **Bank Fraud**

7 1. The allegations of Count Fourteen of this Indictment are hereby realleged and
8 incorporated herein by reference for the purpose of alleging forfeiture pursuant to the provision of Title
9 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

10 2. Upon a conviction of the felony offenses charged in Count Fourteen of this Indictment,

11 **STEVEN W. GRIMM,**
12 **EVE E. MAZZARELLA,**
13 **MELISSA R. BEECROFT,**
14 **CHRISTINA R. THOMPSON,**
AMY R. ORTIZ, and
JYOTHI PANIKKAR,

15 defendants herein, shall forfeit to the United States of America, any property constituting, or derived
16 from, proceeds traceable to a violation of Title 18, United States Code, Section 1344 or a conspiracy
17 to commit such an offense up to \$599,000.00 in United States Currency.

18 3. If any property being subject to forfeiture pursuant to Title 18, United States Code,
19 Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), as a result of any act or
20 omission of the defendants –

- 21 a. cannot be located upon the exercise of due diligence;
22 b. has been transferred or sold to, or deposited with, a third party;
23 c. has been place beyond the jurisdiction of the court;
24 d. has been substantially diminished in value, or;
25 e. has been commingled with other property that cannot be divided without
26 difficulty;

1 it is the intent of the United States of America to seek forfeiture of any properties of the defendants up
2 to \$599,000.00 in United States Currency.

3 All pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States
4 Code, Section 2461(c); Title 18, United States Code, Section 1344; and Title 21, United States Code,
5 Section 853(p).

6 **FORFEITURE ALLEGATION TWENTY-EIGHT**
7 Bank Fraud

8 1. The allegations of Count Fourteen of this Indictment are hereby realleged and
9 incorporated herein by reference for the purpose of alleging forfeiture pursuant to the provision of Title
10 18, United States Code, Section 982(a)(2)(A).

11 2. Upon a conviction of the felony offenses charged in Count Fourteen of this Indictment,

12 **STEVEN W. GRIMM,**
13 **EVE E. MAZZARELLA,**
14 **MELISSA R. BEECROFT,**
15 **CHRISTINA R. THOMPSON,**
16 **AMY R. ORTIZ, and**
17 **JYOTHI PANIKKAR,**

18 defendants herein, shall forfeit to the United States of America, any property constituting, or derived
19 from, proceeds obtained directly or indirectly, as the result of a violation of Title 18, United States
20 Code, Section 1344 up to \$599,000.00 in United States Currency.

21 3. If any property being subject to forfeiture pursuant to Title 18, United States Code,
22 Section 982(a)(2)(A), as a result of any act or omission of the defendants –

- 23 a. cannot be located upon the exercise of due diligence;
- 24 b. has been transferred or sold to, or deposited with, a third party;
- 25 c. has been place beyond the jurisdiction of the court;
- 26 d. has been substantially diminished in value, or;
- e. has been commingled with other property that cannot be divided without
difficulty;

1 it is the intent of the United States of America to seek forfeiture of any properties of the defendants up
2 to \$599,000.00 in United States Currency.

3 All pursuant to Title 18, United States Code, Sections 982(a)(2)(A) and 982(b); Title 18,
4 United States Code, Section 1344; and Title 21, United States Code, Section 853(p).

5 **FORFEITURE ALLEGATION TWENTY-NINE**
6 **Conspiracy to Commit Money Laundering**

7 1. The allegations of Count Fifteen of this Indictment are hereby realleged and
8 incorporated herein by reference for the purpose of alleging forfeiture pursuant to the provision of Title
9 18, United States Code, Section 981(a)(1)(A) and Title 28, United States Code, Section 2461(c).

10 2. Upon a conviction of the felony offenses charged in Count Fifteen of this Indictment,

11 **STEVEN W. GRIMM,**
12 **EVE E. MAZZARELLA,**
13 **MELISSA R. BEECROFT,**
14 **CHRISTINA R. THOMPSON,**
AMY R. ORTIZ, and
JYOTHI PANIKKAR,

15 defendants herein, shall forfeit to the United States of America, any property, real or personal, involved
16 in a transaction or attempted transaction in violation of Title 18, United States Code, Section 1956(h),
17 conspiracy to commit a violation of Title 18, United States Code, Section 1956, or any property
18 traceable to such property, up to \$2,000,868.34 in United States Currency.

19 3. If any property being subject to forfeiture pursuant to Title 18, United States Code,
20 Section 981(a)(1)(A) and Title 28, United States Code, Section 2461(c), as a result of any act or
21 omission of the defendants --

- 22 a. cannot be located upon the exercise of due diligence;
- 23 b. has been transferred or sold to, or deposited with, a third party;
- 24 c. has been place beyond the jurisdiction of the court;
- 25 d. has been substantially diminished in value, or;
- 26

1 e. has been commingled with other property that cannot be divided without
2 difficulty;

3 it is the intent of the United States of America to seek forfeiture of any properties of the defendants up
4 to \$2,000,868.34 in United States Currency.

5 All pursuant to Title 18, United States Code, Section 981(a)(1)(A) and Title 28, United States
6 Code, Section 2461(c); Title 18, United States Code, Section 1956(h); and Title 21, United States Code,
7 Section 853(p).

8 **FORFEITURE ALLEGATION THIRTY**
9 **Conspiracy to Commit Money Laundering**

10 1. The allegations of Count Fifteen of this Indictment are hereby realleged and
11 incorporated herein by reference for the purpose of alleging forfeiture pursuant to the provision of Title
12 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

13 2. Upon a conviction of the felony offenses charged in Count Fifteen of this Indictment,

14 **STEVEN W. GRIMM,**
15 **EVE E. MAZZARELLA,**
16 **MELISSA R. BEECROFT,**
17 **CHRISTINA R. THOMPSON,**
AMY R. ORTIZ, and
JYOTHI PANIKKAR,

18 defendants herein, shall forfeit to the United States of America, any property constituting, or derived
19 from, proceeds traceable to a conspiracy in violation of Title 18, United States Code, Section 1956(h),
20 to commit a violation of Title 18, United States Code, Section 1956 up to \$2,000,868.34 in United
21 States Currency.

22 3. If any property being subject to forfeiture pursuant to Title 18, United States Code,
23 Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), as a result of any act or
24 omission of the defendants –

- 25 a. cannot be located upon the exercise of due diligence;
- 26 b. has been transferred or sold to, or deposited with, a third party;

- 1 c. has been place beyond the jurisdiction of the court;
- 2 d. has been substantially diminished in value, or;
- 3 e. has been commingled with other property that cannot be divided without
- 4 difficulty;

5 it is the intent of the United States of America to seek forfeiture of any properties of the defendants up
6 to \$2,000,868.34 in United States Currency.

7 All pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States
8 Code, Section 2461(c); Title 18, United States Code, Section 1956(h); and Title 21, United States Code,
9 Section 853(p).

10 **FORFEITURE ALLEGATION THIRTY-ONE**
11 **Conspiracy to Commit Money Laundering**

12 1. The allegations of Count Fifteen of this Indictment are hereby realleged and
13 incorporated herein by reference for the purpose of alleging forfeiture pursuant to the provision of Title
14 18, United States Code, Section 982(a)(1) and Title 28, United States Codes, Section 2461(c).

15 2. Upon a conviction of the felony offenses charged in Count Fifteen of this Indictment,

16 **STEVEN W. GRIMM,**
17 **EVE E. MAZZARELLA,**
18 **MELISSA R. BEECROFT,**
19 **CHRISTINA R. THOMPSON,**
AMY R. ORTIZ, and
JYOTHI PANIKKAR,

20 defendants herein, shall forfeit to the United States of America, any property, real or personal, involved
21 in violations of, Title 18, United States Code, Section 1956(h), conspiracy to commit a violation of
22 Title 18, United States Code, Section 1956, or any property traceable to such property, up to
23 \$2,000,868.34 in United States Currency.

24 3. If any property being subject to forfeiture pursuant to Title 18, United States Code,
25 Section 982(a)(1) and Title 28, United States Code, Section 2461(c), as a result of any act or omission
26 of the defendants –

- 1 a. cannot be located upon the exercise of due diligence;
- 2 b. has been transferred or sold to, or deposited with, a third party;
- 3 c. has been place beyond the jurisdiction of the court;
- 4 d. has been substantially diminished in value, or;
- 5 e. has been commingled with other property that cannot be divided without
- 6 difficulty;

7 it is the intent of the United States of America to seek forfeiture of any properties of the defendants up
8 to \$2,000,868.34 in United States Currency.

9 All pursuant to Title 18, United States Code, Section 982(a)(1) and 982(b); Title 28, United
10 States Code, Section 2461(c); Title 18, United States Code, Section 1956(h); and Title 21, United
11 States Code, Section 853(p).

12 **FORFEITURE ALLEGATION THIRTY-TWO**
13 Engaging in Monetary Transactions in Property Derived From Specified Unlawful Activity

14 1. The allegations of Count Sixteen of this Indictment are hereby realleged and
15 incorporated herein by reference for the purpose of alleging forfeiture pursuant to the provision of Title
16 18, United States Code, Section 981(a)(1)(A) and Title 28, United States Code, Section 2461(c).

17 2. Upon a conviction of the felony offenses charged in Count Sixteen of this Indictment,

18 **EVE E. MAZZARELLA,**

19 defendant herein, shall forfeit to the United States of America, any property, real or personal, involved
20 in a transaction or attempted transaction in violation of Title 18, United States Code, Section 1957, or
21 any property traceable to such property, up to \$160,000.00 in United States Currency.

22 3. If any property being subject to forfeiture pursuant to Title 18, United States Code,
23 Section 981(a)(1)(A) and Title 28, United States Code, Section 2461(c), as a result of any act or
24 omission of the defendant –

- 25 a. cannot be located upon the exercise of due diligence;
- 26 b. has been transferred or sold to, or deposited with, a third party;

- 1 c. has been place beyond the jurisdiction of the court;
- 2 d. has been substantially diminished in value, or;
- 3 e. has been commingled with other property that cannot be divided without
- 4 difficulty;

5 it is the intent of the United States of America to seek forfeiture of any properties of the defendant up
6 to \$160,000.00 in United States Currency.

7 All pursuant to Title 18, United States Code, Section 981(a)(1)(A); Title 28, United States
8 Code, Section 2461(c); Title 18, United States Code, Section 1957; and Title 21, United States Code,
9 Section 853(p).

10 **FORFEITURE ALLEGATION THIRTY-THREE**
11 Engaging in Monetary Transactions in Property Derived From Specified Unlawful Activity

12 1. The allegations of Count Sixteen of this Indictment are hereby realleged and
13 incorporated herein by reference for the purpose of alleging forfeiture pursuant to the provision of Title
14 18, United States Code, Section 982(a)(1) and Title 28, United States Codes, Section 2461(c).

15 2. Upon a conviction of the felony offenses charged in Count Sixteen of this Indictment,

16 **EVE E. MAZZARELLA,**

17 defendant herein, shall forfeit to the United States of America, any property, real or personal, involved
18 in violations of Title 18, United States Code, Section 1957, or any property traceable to such property,
19 up to \$160,000.00 in United States Currency.

20 3. If any property being subject to forfeiture pursuant to Title 18, United States Code,
21 Section 982(a)(1) and Title 28, United States Code, Section 2461(c), as a result of any act or omission
22 of the defendant –

- 23 a. cannot be located upon the exercise of due diligence;
- 24 b. has been transferred or sold to, or deposited with, a third party;
- 25 c. has been place beyond the jurisdiction of the court;
- 26 d. has been substantially diminished in value, or;

1 e. has been commingled with other property that cannot be divided without
2 difficulty;

3 it is the intent of the United States of America to seek forfeiture of any properties of the defendant up
4 to \$160,000.00 in United States Currency.

5 All pursuant to Title 18, United States Code, Section 982(a)(1) and 982(b); Title 28, United
6 States Code, Section 2461(c); Title 18, United States Code, Section 1957; and Title 21, United States
7 Code, Section 853(p).

8 **DATED:** this 18 day of June 2008.

9 **A TRUE BILL:**

10 /S/
11 FOREPERSON OF THE GRAND JURY

12 GREGORY A. BROWER
13 United States Attorney

14 
15 BRIAN PUGH
16 Assistant United States Attorney

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