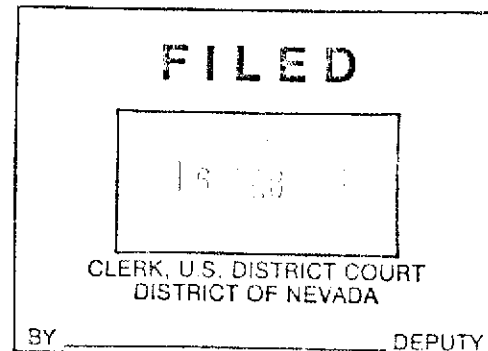


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5  
6 **UNITED STATES DISTRICT COURT**  
7 **DISTRICT OF NEVADA**

8 **-oOo-**

9 UNITED STATES OF AMERICA,	)	SUPERSEDING INDICTMENT
	)	
10 Plaintiff,	)	2:08-cr-0064-RLH-GWF
	)	
11 VS.	)	VIOLATIONS:
	)	18 U.S.C. § 1349 - Conspiracy to Commit
12 STEVEN W. GRIMM,	)	Bank Fraud, Mail Fraud, and Wire Fraud
EVE E. MAZZARELLA, and	)	18 U.S.C. § 1344 - Bank Fraud
13 MELISSA R. BEECROFT,	)	18 U.S.C. § 1341- Mail Fraud
	)	18 U.S.C. § 1343- Wire Fraud
14 Defendants.	)	18 U.S.C. §2 - Aiding and Abetting
	)	

15  
16 **THE GRAND JURY CHARGES THAT:**

17 **INTRODUCTION**

18 At all times relevant to this Indictment:

19 1. Purchasers of homes typically financed their purchases by submitting loan  
20 applications to lending institutions to obtain mortgages. Loan applications required borrowers  
21 truthfully to disclose certain information such as employment; income; assets, including bank  
22 account balances; current monthly expenses, including rent or mortgage payments; and whether the  
23 home to be purchased was to be the borrower's primary residence or was to be used as an investment  
24 property. This information was material to lending institutions' decisions whether to loan money to  
25 the borrower, the amount of any such loan, and the terms of the loan, such as the interest rate the  
26 borrower was to pay. Lending institutions often requested verification of a borrower's employment,

1 income, assets such as bank account balances, and current monthly expenses such as rent, and relied  
2 on such verifications in making decisions to loan money to the borrower.

3 2. A "straw buyer" was an individual in whose name loan applications were submitted  
4 to lending institutions to obtain mortgage loans to enable other persons, unidentified to the lending  
5 institution, to purchase and control homes.

6 3. A "third party disbursement" was the payment of funds from loan proceeds at the  
7 closing of escrow to a person or entity that is not typically entitled to receive funds at the close of  
8 escrow, as were the seller and the parties that facilitated the transaction, such as the realtor, mortgage  
9 company, mortgage broker, lender, and the title and escrow company.

10 4. Defendant **STEVEN W. GRIMM** was resident agent, president, secretary, treasurer,  
11 and director of numerous business entities, including but not limited to Pro Design, Incorporated ("Pro  
12 Design"), Premier Design Concepts, Inc. ("Premier Design"), and R. E. Property Solutions, Inc., each  
13 of which are Nevada Corporations.

14 5. Defendant **EVE E. MAZZARELLA** was resident agent, president, secretary,  
15 treasurer, and director of numerous business entities, including but not limited to Distinctive Real  
16 Estate & Investments ("DREI"), a Nevada Corporation.

17 6. Defendants **STEVEN W. GRIMM** and **EVE E. MAZZARELLA** had signatory  
18 authority over the numerous bank accounts.

19 7. Defendant **MELISSA R. BEECROFT** was resident agent and manager of Secured  
20 Mortgage Services, LLC ("Secured Mortgage"), a Limited Liability Company registered with the  
21 Nevada Secretary of State.

22 **COUNT ONE**

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

24 8. Paragraphs 1 through 7 of the introduction to this indictment are re-alleged and  
25 incorporated herein as if set forth in full.

26 . . . .

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

3  
4                               **STEVEN W. GRIMM,**  
5                               **EVE E. MAZZARELLA, and**  
6                               **MELISSA R. BEECROFT,**

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

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

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

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

22                               The Objectives of the Conspiracy and Scheme to Defraud

23           10.       The object of the conspiracy and scheme was to obtain money and property by  
24 causing false information regarding straw buyers' employment, income, and assets to be placed in the  
25 straw buyers' applications and supporting documentation to obtain mortgage loans from financial  
26 institutions to purchase residential real estate ("property" or "properties"). Through these transactions,  
defendants obtained control of approximately 227 properties and obtained money from financial

1 institutions by causing the money from the mortgage loans to be diverted to their own use and benefit  
2 and the use and benefit of others. The total purchase price of the approximate 227 properties was  
3 greater than \$107,000,000.

4 Manner and Means

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

7 a. Defendants solicited and caused to be solicited persons with good credit  
8 ratings to act as straw buyers to purchase properties on defendants' behalf.

9 b. Defendants made and caused to be made offers to purchase properties above  
10 the sellers' asking prices. Defendants caused the sellers to agree that the excess funds be redirected  
11 to business entities controlled by **GRIMM and MAZZARELLA** under the pretense of making  
12 upgrades or repairs to the properties.

13 c. Defendants caused straw buyers to apply for mortgage loans from financial  
14 institutions to purchase properties.

15 d. Defendants completed, and caused to be completed, mortgage loan  
16 applications and related documents in the name of the straw buyers, which contained materially false  
17 and fraudulent information regarding straw buyers' places of employment, income, assets, liabilities,  
18 intent to occupy the properties as their primary residences, and the source of earnest money deposits  
19 and closing costs, which information defendants then and there well knew to be false. Defendants  
20 then submitted, and caused to be submitted, those mortgage loan applications to lending institutions  
21 to finance the purchase of homes. Some of the lending institutions to which the fraudulent loan  
22 applications were submitted were federally-insured financial institutions.

23 e. Defendants caused financial institutions and escrow and title companies to  
24 transmit money and documents by means of interstate wire communications to complete the straw  
25 buyer transactions.

1           f. Defendants caused financial institutions and escrow and title companies to  
2 transmit money and documents by means of U.S. mail and interstate commercial carriers to complete  
3 the straw buyer transactions.

4           g. Defendants caused title and escrow companies to make third party  
5 disbursements to entities which were controlled by defendants **GRIMM and MAZZARELLA** for  
6 defendants' own use and benefit.

7           h. Defendants caused mortgage brokers, loan officers and others associated with  
8 the straw buyer transactions to remit a portion of their commissions and fees to defendants.

9           i. Defendants paid persons to be straw buyers.

10          j. Defendants created and controlled numerous limited liability companies  
11 ("LLC's"). Defendants named the LLC's after straw buyers, typically using the straw buyers' first  
12 initial and last name.

13          k. Defendants caused straw buyers to sign documents transferring their interests  
14 in the properties they had purchased into one of the LLC's. Defendants would not pay straw buyers  
15 for the use of their identities until they transferred their interest in a property to an LLC.

16          l. Defendants opened bank accounts for each LLC. Defendants **GRIMM and**  
17 **MAZZARELLA** controlled the LLC bank accounts.

18          m. Defendants **GRIMM and MAZZARELLA** defaulted on mortgage payments  
19 on the mortgage loans which caused the properties to go into foreclosure. Defendants have thereby  
20 caused losses to financial institutions greater than twenty million dollars (\$20,000,000).

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

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**COUNTS TWO THROUGH SEVEN****Bank Fraud**

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

**STEVEN W. GRIMM, and  
EVE E. MAZZARELLA,**

defendants herein, did devise and intend to devise a scheme and artifice to defraud federally-insured financial institutions and to obtain moneys, funds, credits, assets, securities, and other property owned by and under the custody and control a financial institution by means of false and fraudulent pretenses, representations, and promises.

13. The allegations set forth in paragraphs 1-11 of this indictment are incorporated herein as if set forth in full.

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

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

<u>Count</u>	<u>Defendants</u>	<u>Date</u>	<u>Property</u>	<u>Financial Institution</u>
5	Steven W. Grimm Eve E. Mazzarella	4/12/07	1800 S. 16 <sup>th</sup> St. Las Vegas, Nevada	Ohio Savings Bank
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

### **COUNTS EIGHT THROUGH TWELVE**

#### **Mail Fraud**

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

#### **STEVEN W. GRIMM, EVE E. MAZZARELLA, and MELISSA BEECROFT**

did devise and intended to devise a scheme and artifice to defraud and for obtaining money and property by means of false and fraudulent pretenses, representations and promises.

16. The allegations set forth in paragraphs 1-11 of this indictment are incorporated herein as if set forth in full.

17. On or about the dates set forth below, in the State and Federal District of Nevada and elsewhere, for the purpose of executing and attempting to execute the scheme to defraud and to obtain money and property, defendants did knowingly cause to be placed in an authorized depository for mail matter to be sent and delivered by commercial interstate carriers, cause to be deposited to be sent and delivered by commercial interstate carriers, and cause to be delivered by commercial interstate carriers according to the direction thereon the following mail matters in connection with the fraudulent straw purchases of the following properties, with each mailing and delivery constituting a separate violation of Title 18, United States Code, Sections 1341 and 2:

<u>Count</u>	<u>Defendants</u>	<u>Date</u>	<u>Property</u>	<u>Mail Matter</u>
8	Steven Grimm Eve Mazzarella Melissa Beecroft	5/5/06	7254 Crest Peak Ave. Las Vegas, NV	Funding Package sent via California Overnight from Financial Title in Nevada to StoneCreek Funding in Arizona

<u>Count</u>	<u>Defendants</u>	<u>Date</u>	<u>Property</u>	<u>Mail Matter</u>
9	Steven Grimm Eve Mazzarella	5/8/06	2872 Rothesay Ave. Las Vegas, NV	Pre-existing mortgage payoff sent via UPS from LandAmerica in Nevada to Nevada State Bank in Utah
10	Steven Grimm Eve Mazzarella Melissa Beecroft	7/18/06	656 Bonanza Plain Las Vegas, NV	Signed loan documents sent via Federal Express from the seller in Arizona to National Alliance Title in Nevada
11	Steven Grimm Eve Mazzarella Melissa Beecroft	10/3/06	7420 Speedwell Cavern Las Vegas, NV	Funding Package sent via California Overnight from Financial Title in Nevada to BNC Mortgage in California
12	Steven Grimm Eve Mazzarella	1/2/07	2209 Santa Ynez Dr. Las Vegas, NV	Funding Package sent via California Overnight from Financial Title in Nevada to New Century Mortgage Corp. in Arizona

### COUNTS THIRTEEN AND FOURTEEN

#### Wire Fraud

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

#### **STEVEN W. GRIMM, EVE E. MAZZARELLA, and MELISSA BEECROFT,**

defendants herein, did devise and intend to devise a scheme and artifice to defraud and for obtaining money and property by means of false and fraudulent pretenses, representations and promises.

19. The allegations set forth in paragraphs 1-11 of this indictment are incorporated herein as if set forth in full.

20. On or about the dates set forth below, in the State and Federal District of Nevada and elsewhere, for the purpose of executing and attempting to execute the scheme to defraud and to obtain money and property, the defendants did knowingly cause to be transmitted by means of wire communication in interstate commerce certain signs, signals, and sounds, that is, the wire



communications identified below, with each wire communication constituting a separate violation of Title 18, United States Code, Sections 1343 and 2:

<u>Count</u>	<u>Defendants</u>	<u>Date</u>	<u>Property</u>	<u>Wire Communication</u>
13	Steven Grimm Eve Mazarella Melissa Beecroft	9/1/06	1425 Healing Waters Las Vegas, NV	Stonecreek Funding faxed a Conditional Loan Approval from Arizona to Nevada
14	Steven Grimm Eve Mazarella Melissa Beecroft	3/16/07	8348 Snowmass Dr. Las Vegas, NV	America's Servicing Co. faxed a payoff statement from Iowa to National Alliance Title in Nevada

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**FORFEITURE ALLEGATION ONE**

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

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

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

**STEVEN W. GRIMM,  
EVE E. MAZZARELLA, and  
MELISSA R. BEECROFT,**

defendants herein, shall forfeit to the United States of America any property constituting, or derived from, proceeds obtained directly or indirectly, as a result of violations of Title 18, United States Code, Section 1341; Title 18, United States Code, Section 1343; Title 18, United States Code, Section 1344; or Title 18, United States Code, Section 1349, a conspiracy to commit such offenses, a criminal forfeiture money judgment up to \$107,000,000.00 in United States Currency.

3. If any property subject to forfeiture pursuant to Title 18, United States Code, Section 982(a)(2)(A), 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 placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States of America, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any properties of the defendants up to \$107,000,000.00 in United States Currency.

1 All pursuant to Title 18, United States Code, Section 982(a)(2)(A); Title 18, United States  
2 Code, Section 1341; Title 18, United States Code, Section 1343; Title 18, United States Code, Section  
3 1344; Title 18, United States Code, Section 1349; and Title 21, United States Code, Section 853(p).

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5 **FORFEITURE ALLEGATION TWO**

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

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

11 2. Upon conviction of the felony offense charged in Count One of this Second  
12 Superseding Indictment,

13 **STEVEN W. GRIMM,  
EVE E. MAZZARELLA, and  
MELISSA R. BEECROFT,**

14 defendants herein, shall forfeit to the United States of America, any property which constitutes or is  
15 derived from proceeds traceable to violations of Title 18, United States Code, Section 1341, a specified  
16 unlawful activity as defined in Title 18, United States Code, Sections 1956(c)(7)(A) and 1961(1)(B);  
17 Title 18, United States Code, Section 1343, a specified unlawful activity as defined in Title 18, United  
18 States Code, Sections 1956(c)(7)(A) and 1961(1)(B); Title 18, United States Code, Section 1344; or  
19 Title 18, United States Code, Section 1349, a conspiracy to commit such offenses, a criminal forfeiture  
20 money judgment up to \$107,000,000.00 in United States Currency.

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

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

d. has been substantially diminished in value; or

e. has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States of America, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any properties of the defendants up to \$107,000,000.00 in United States Currency.

All pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c); Title 18, United States Code, Section 1341, a specified unlawful activity as defined in Title 18, United States Code, Sections 1956(c)(7)(A) and 1961(1)(B); Title 18, United States Code, Section 1343, a specified unlawful activity as defined in Title 18, United States Code, Sections 1956(c)(7)(A) and 1961(1)(B); Title 18, United States Code, Section 1344; Title 18, United States Code, Section 1349; and Title 21, United States Code, Section 853(p).

### **FORFEITURE ALLEGATION THREE**

#### **Bank Fraud**

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

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

**STEVEN W. GRIMM, and  
EVE E. MAZZARELLA,**

defendants herein, shall forfeit to the United States of America, any property constituting, or derived from, proceeds obtained directly or indirectly, as a result of violations of Title 18, United States Code, Section 1344, or a conspiracy to commit such offenses, a criminal forfeiture money judgment up to \$590,000.00 in United States Currency.

3. If any property being subject to forfeiture pursuant to Title 18, United States Code, Section 982(a)(2)(A), 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 placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States of America, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any properties of the defendants up to \$590,000.00 in United States Currency.

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

**FORFEITURE ALLEGATION FOUR**  
Bank Fraud

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

2. Upon conviction of the felony offenses charged in Count Two of this Second Superseding Indictment,

**STEVEN W. GRIMM, and  
EVE E. MAZZARELLA,**

defendants herein, shall forfeit to the United States of America, any property which constitutes or is derived from proceeds traceable to violations of Title 18, United States Code, Section 1344, or a

1 conspiracy to commit such offenses, a criminal forfeiture money judgment up to \$590,000.00 in United  
2 States Currency.

3 3. If any property subject to forfeiture pursuant to Title 18, United States Code, Section  
4 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), as a result of any act or omission of  
5 the defendants -

- 6 a. cannot be located upon the exercise of due diligence;
- 7 b. has been transferred or sold to, or deposited with, a third party;
- 8 c. has been placed beyond the jurisdiction of the court;
- 9 d. has been substantially diminished in value; or
- 10 e. has been commingled with other property which cannot be divided without  
11 difficulty;

12 it is the intent of the United States of America, pursuant to Title 21, United States Code, Section  
13 853(p), to seek forfeiture of any properties of the defendants up to \$590,000.00 in United States  
14 Currency.

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

18 **FORFEITURE ALLEGATION FIVE**  
19 Bank Fraud

20 1. The allegations contained in Count Three of this Second Superseding Indictment are  
21 hereby realleged and incorporated herein by reference for the purpose of alleging forfeiture pursuant  
22 to the provisions of Title 18, United States Code, Section 982(a)(2)(A).

23 2. Upon a conviction of the felony offenses charged in Count Three of this Second  
24 Superseding Indictment,

25 **STEVEN W. GRIMM, and**  
26 **EVE E. MAZZARELLA,**

defendants herein, shall forfeit to the United States of America, any property constituting, or derived from, proceeds obtained directly or indirectly, as a result of violations of Title 18, United States Code, Section 1344, or a conspiracy to commit such offenses, a criminal forfeiture money judgment up to \$268,000.00 in United States Currency.

3. If any property being subject to forfeiture pursuant to Title 18, United States Code, Section 982(a)(2)(A), 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 which cannot be divided without difficulty;

it is the intent of the United States of America, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any properties of the defendants up to \$268,000.00 in United States Currency.

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

### **FORFEITURE ALLEGATION SIX** Bank Fraud

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

2. Upon conviction of the felony offenses charged in Count Three of this Second Superseding Indictment,

**STEVEN W. GRIMM, and  
EVE E. MAZZARELLA,**

defendants herein, shall forfeit to the United States of America, any property which constitutes or is derived from proceeds traceable to violations of Title 18, United States Code, Section 1344, or a conspiracy to commit such offenses, a criminal forfeiture money judgment up to \$268,000.00 in United States Currency.

3. If any property 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 placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States of America, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any properties of the defendants up to \$268,000.00 in United States Currency.

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

**FORFEITURE ALLEGATION SEVEN**  
Bank Fraud

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



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

**STEVEN W. GRIMM, and  
EVE E. MAZZARELLA,**

defendants herein, shall forfeit to the United States of America, any property constituting, or derived from, proceeds obtained directly or indirectly, as a result of violations of Title 18, United States Code, Section 1344, or a conspiracy to commit such offenses, a criminal forfeiture money judgment up to \$510,000.00 in United States Currency.

3. If any property being subject to forfeiture pursuant to Title 18, United States Code, Section 982(a)(2)(A), 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 which cannot be divided without difficulty;

it is the intent of the United States of America, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any properties of the defendants up to \$510,000.00 in United States Currency.

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

**FORFEITURE ALLEGATION EIGHT**  
**Bank Fraud**

1. The allegations contained in Count Four of this Second Superseding Indictment are hereby realleged and incorporated herein by reference for the purpose of alleging forfeiture pursuant

1 to the provisions of Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States  
2 Code, Section 2461(c).

3 2. Upon conviction of the felony offenses charged in Count Four of this Second  
4 Superseding Indictment,

5  
6 **STEVEN W. GRIMM, and**  
**EVE E. MAZZARELLA,**

7 defendants herein, shall forfeit to the United States of America, any property which constitutes or is  
8 derived from proceeds traceable to violations of Title 18, United States Code, Section 1344, or a  
9 conspiracy to commit such offenses, a criminal forfeiture money judgment up to \$510,000.00 in United  
10 States Currency.

11 3. If any property subject to forfeiture pursuant to Title 18, United States Code, Section  
12 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), as a result of any act or omission of  
13 the defendants -

- 14 a. cannot be located upon the exercise of due diligence;  
15 b. has been transferred or sold to, or deposited with, a third party;  
16 c. has been placed beyond the jurisdiction of the court;  
17 d. has been substantially diminished in value; or  
18 e. has been commingled with other property which cannot be divided without  
19 difficulty;

20 it is the intent of the United States of America, pursuant to Title 21, United States Code, Section  
21 853(p), to seek forfeiture of any properties of the defendants up to \$510,000.00 in United States  
22 Currency.

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

**FORFEITURE ALLEGATION NINE**

**Bank Fraud**

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3       1.       The allegations contained in Count Five of this Second Superseding Indictment are  
4 hereby realleged and incorporated herein by reference for the purpose of alleging forfeiture pursuant  
5 to the provisions of Title 18, United States Code, Section 982(a)(2)(A).

6       2.       Upon a conviction of the felony offenses charged in Count Five of this Second  
7 Superseding Indictment,

8  
9                   **STEVEN W. GRIMM, and**  
                  **EVE E. MAZZARELLA,**

10 defendants herein, shall forfeit to the United States of America, any property constituting, or derived  
11 from, proceeds obtained directly or indirectly, as a result of violations of Title 18, United States Code,  
12 Section 1344, or a conspiracy to commit such offenses, a criminal forfeiture money judgment up to  
13 \$485,000.00 in United States Currency.

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

- 16               a.       cannot be located upon the exercise of due diligence;  
17               b.       has been transferred or sold to, or deposited with, a third party;  
18               c.       has been place beyond the jurisdiction of the court;  
19               d.       has been substantially diminished in value; or  
20               e.       has been commingled with other property which cannot be divided without  
21 difficulty;

22 it is the intent of the United States of America, pursuant to Title 21, United States Code, Section  
23 853(p), to seek forfeiture of any properties of the defendants up to \$485,000.00 in United States  
24 Currency.

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

**FORFEITURE ALLEGATION TEN**  
**Bank Fraud**

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3       1.       The allegations contained in Count Five of this Second Superseding Indictment are  
4 hereby realleged and incorporated herein by reference for the purpose of alleging forfeiture pursuant  
5 to the provisions of Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States  
6 Code, Section 2461(c).

7       2.       Upon conviction of the felony offenses charged in Count Five of this Second  
8 Superseding Indictment,

**STEVEN W. GRIMM, and**  
**EVE E. MAZZARELLA,**

9  
10  
11 defendants herein, shall forfeit to the United States of America, any property which constitutes or is  
12 derived from proceeds traceable to violations of Title 18, United States Code, Section 1344, or a  
13 conspiracy to commit such offenses, a criminal forfeiture money judgment up to \$485,000.00 in United  
14 States Currency.

15       3.       If any property subject to forfeiture pursuant to Title 18, United States Code, Section  
16 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), as a result of any act or omission of  
17 the defendants -

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

24 it is the intent of the United States of America, pursuant to Title 21, United States Code, Section  
25 853(p), to seek forfeiture of any properties of the defendants up to \$485,000.00 in United States  
26 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); Title 18, United States Code, Section 1344; and Title 21, United States Code,  
3 Section 853(p).

4 **FORFEITURE ALLEGATION ELEVEN**

5 Bank Fraud

6 1. The allegations contained in Count Six of this Second Superseding Indictment are  
7 hereby realleged and incorporated herein by reference for the purpose of alleging forfeiture pursuant  
8 to the provisions of Title 18, United States Code, Section 982(a)(2)(A).

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

11 **STEVEN W. GRIMM, and**  
12 **EVE E. MAZZARELLA,**

13 defendants herein, shall forfeit to the United States of America, any property constituting, or derived  
14 from, proceeds obtained directly or indirectly, as a result of violations of Title 18, United States Code,  
15 Section 1344, or a conspiracy to commit such offenses, a criminal forfeiture money judgment up to  
16 \$520,000.00 in United States Currency.

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

- 19 a. cannot be located upon the exercise of due diligence;  
20 b. has been transferred or sold to, or deposited with, a third party;  
21 c. has been place beyond the jurisdiction of the court;  
22 d. has been substantially diminished in value; or  
23 e. has been commingled with other property which cannot be divided without  
24 difficulty;  
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1 it is the intent of the United States of America, pursuant to Title 21, United States Code, Section  
2 853(p), to seek forfeiture of any properties of the defendants up to \$520,000.00 in United States  
3 Currency.

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

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

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

13 2. Upon conviction of the felony offenses charged in Count Six of this Second  
14 Superseding Indictment,

15 **STEVEN W. GRIMM, and**  
16 **EVE E. MAZZARELLA,**

17 defendants herein, shall forfeit to the United States of America, any property which constitutes or is  
18 derived from proceeds traceable to violations of Title 18, United States Code, Section 1344, or a  
19 conspiracy to commit such offenses, a criminal forfeiture money judgment up to \$520,000.00 in United  
20 States Currency.

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

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

1 e. has been commingled with other property which cannot be divided without  
2 difficulty;  
3 it is the intent of the United States of America, pursuant to Title 21, United States Code, Section  
4 853(p), to seek forfeiture of any properties of the defendants up to \$520,000.00 in United States  
5 Currency.

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

9  
10 **FORFEITURE ALLEGATION THIRTEEN**

11 **Bank Fraud**

12 1. The allegations contained in Count Seven of this Second Superseding Indictment are  
13 hereby realleged and incorporated herein by reference for the purpose of alleging forfeiture pursuant  
14 to the provisions of Title 18, United States Code, Section 982(a)(2)(A).

15 2. Upon a conviction of the felony offenses charged in Count Seven of this Second  
16 Superseding Indictment,

17 **STEVEN W. GRIMM, and  
EVE E. MAZZARELLA,**

18 defendants herein, shall forfeit to the United States of America, any property constituting, or derived  
19 from, proceeds obtained directly or indirectly, as a result of violations of Title 18, United States Code,  
20 Section 1344, or a conspiracy to commit such offenses, a criminal forfeiture money judgment up to  
21 \$295,000.00 in United States Currency.

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

- 24 a. cannot be located upon the exercise of due diligence;  
25 b. has been transferred or sold to, or deposited with, a third party;  
26 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 which cannot be divided without difficulty;

it is the intent of the United States of America, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any properties of the defendants up to \$295,000.00 in United States Currency.

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

**FORFEITURE ALLEGATION FOURTEEN**

**Bank Fraud**

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

2. Upon conviction of the felony offenses charged in Count Seven of this Second Superseding Indictment,

**STEVEN W. GRIMM, and  
EVE E. MAZZARELLA,**

defendants herein, shall forfeit to the United States of America, any property which constitutes or is derived from proceeds traceable to violations of Title 18, United States Code, Section 1344, or a conspiracy to commit such offenses, a criminal forfeiture money judgment up to \$295,000.00 in United States Currency.

3. If any property 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 placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States of America, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any properties of the defendants up to \$295,000.00 in United States Currency.

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

**FORFEITURE ALLEGATION FIFTEEN**  
Mail Fraud

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

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

**STEVEN W. GRIMM,  
EVE E. MAZZARELLA, and  
MELISSA R. BEECROFT,**

defendants herein, shall forfeit to the United States of America, any property constituting, or derived from, proceeds obtained directly or indirectly, as a result of violations of Title 18, United States Code, Section 1341, or a conspiracy to commit such offenses, a criminal forfeiture money judgment up to \$319,900.00 in United States Currency.

3. If any property being subject to forfeiture pursuant to Title 18, United States Code, Section 982(a)(2)(A), 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 placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States of America, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any properties of the defendants up to \$319,900.00 in United States Currency.

All pursuant to Title 18, United States Code, Section 982(a)(2)(A); Title 18, United States Code, Section 1341; and Title 21, United States Code, Section 853(p).

**FORFEITURE ALLEGATION SIXTEEN**  
Mail Fraud

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

2. Upon conviction of the felony offenses charged in Count Eight of this Second Superseding Indictment,

**STEVEN W. GRIMM,  
EVE E. MAZZARELLA, and  
MELISSA R. BEECROFT,**

defendants herein, shall forfeit to the United States of America, any property which constitutes or is derived from proceeds traceable to violations of Title 18, United States Code, Section 1341, a specified unlawful activity as defined in Title 18, United States Code, Sections 1956(c)(7)(A) and 1961(1)(B), or a conspiracy to commit such offense, a criminal forfeiture money judgment up to \$319,900.00 in United States Currency.

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

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

10    it is the intent of the United States of America, pursuant to Title 21, United States Code, Section  
11    853(p), to seek forfeiture of any properties of the defendants up to \$319,900.00 in United States  
12    Currency.

13           All pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United  
14    States Code, Section 2461(c); Title 18, United States Code, Section 1341, a specified unlawful  
15    activity as defined in Title 18, United States Code, Sections 1956(c)(7)(A) and 1961(1)(B); and  
16    Title 21, United States Code, Section 853(p).

17                           **FORFEITURE ALLEGATION SEVENTEEN**

18   Mail Fraud

19           1.     The allegations contained in Count Nine of this Second Superseding Indictment are  
20    hereby realleged and incorporated herein by reference for the purpose of alleging forfeiture pursuant  
21    to the provisions of Title 18, United States Code, Section 982(a)(2)(A).

22           2.     Upon a conviction of the felony offenses charged in Count Nine of this Second  
23    Superseding Indictment,

24   **STEVEN W. GRIMM,**  
25   **EVE E. MAZZARELLA, and**  
26   **MELISSA R. BEECROFT,**

defendants herein, shall forfeit to the United States of America, any property constituting, or derived from, proceeds obtained directly or indirectly, as a result of violations of Title 18, United States Code, Section 1341, or a conspiracy to commit such offenses, a criminal forfeiture money judgment up to \$419,000.00 in United States Currency.

3. If any property being subject to forfeiture pursuant to Title 18, United States Code, Section 982(a)(2)(A), 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 placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States of America, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any properties of the defendants up to \$419,000.00 in United States Currency.

All pursuant to Title 18, United States Code, Section 982(a)(2)(A); Title 18, United States Code, Section 1341; and Title 21, United States Code, Section 853(p).

### **FORFEITURE ALLEGATION EIGHTEEN**

#### **Mail Fraud**

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

2. Upon conviction of the felony offenses charged in Count Nine of this Second Superseding Indictment,

. . . .

**STEVEN W. GRIMM,  
EVE E. MAZZARELLA, and  
MELISSA R. BEECROFT,**

defendants herein, shall forfeit to the United States of America, any property which constitutes or is derived from proceeds traceable to violations of Title 18, United States Code, Section 1341, a specified unlawful activity as defined in Title 18, United States Code, Sections 1956(c)(7)(A) and 1961(1)(B), or a conspiracy to commit such offense, a criminal forfeiture money judgment up to \$419,000.00 in United States Currency.

3. If any property 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 placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States of America, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any properties of the defendants up to \$419,000.00 in United States Currency.

All pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c); Title 18, United States Code, Section 1341, a specified unlawful activity as defined in Title 18, United States Code, Sections 1956(c)(7)(A) and 1961(1)(B); and Title 21, United States Code, Section 853(p).

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**FORFEITURE ALLEGATION NINETEEN**

Mail Fraud

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3       1.       The allegations contained in Count Ten of this Second Superseding Indictment are  
4 hereby realleged and incorporated herein by reference for the purpose of alleging forfeiture pursuant  
5 to the provisions of Title 18, United States Code, Section 982(a)(2)(A).

6       2.       Upon a conviction of the felony offenses charged in Count Ten of this Second  
7 Superseding Indictment,

8                       **STEVEN W. GRIMM,**  
9                       **EVE E. MAZZARELLA, and**  
                      **MELISSA R. BEECROFT,**

10 defendants herein, shall forfeit to the United States of America, any property constituting, or derived  
11 from, proceeds obtained directly or indirectly, as a result of violations of Title 18, United States Code,  
12 Section 1341, or a conspiracy to commit such offenses, a criminal forfeiture money judgment up to  
13 \$330,000.00 in United States Currency.

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

- 16               a.       cannot be located upon the exercise of due diligence;  
17               b.       has been transferred or sold to, or deposited with, a third party;  
18               c.       has been placed beyond the jurisdiction of the court;  
19               d.       has been substantially diminished in value; or  
20               e.       has been commingled with other property which cannot be divided without  
21 difficulty;

22 it is the intent of the United States of America, pursuant to Title 21, United States Code, Section  
23 853(p), to seek forfeiture of any properties of the defendants up to \$330,000.00 in United States  
24 Currency.

25       All pursuant to Title 18, United States Code, Section 982(a)(2)(A); Title 18, United States  
26 Code, Section 1341; and Title 21, United States Code, Section 853(p).

**FORFEITURE ALLEGATION TWENTY**  
Mail Fraud

1  
2  
3       1.       The allegations contained in Count Ten of this Second Superseding Indictment are  
4 hereby realleged and incorporated herein by reference for the purpose of alleging forfeiture pursuant  
5 to the provisions of Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States  
6 Code, Section 2461(c).

7       2.       Upon conviction of the felony offenses charged in Count Ten of this Second  
8 Superseding Indictment,

9                   **STEVEN W. GRIMM,**  
10                   **EVE E. MAZZARELLA, and**  
                  **MELISSA R. BEECROFT,**

11 defendants herein, shall forfeit to the United States of America, any property which constitutes or is  
12 derived from proceeds traceable to violations of Title 18, United States Code, Section 1341, a specified  
13 unlawful activity as defined in Title 18, United States Code, Sections 1956(c)(7)(A) and 1961(1)(B),  
14 or a conspiracy to commit such offense, a criminal forfeiture money judgment up to \$330,000.00 in  
15 United States Currency.

16       3.       If any property subject to forfeiture pursuant to Title 18, United States Code, Section  
17 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), as a result of any act or omission of  
18 the defendants -

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

1 it is the intent of the United States of America, pursuant to Title 21, United States Code, Section  
2 853(p), to seek forfeiture of any properties of the defendants up to \$330,000.00 in United States  
3 Currency.

4 All pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States  
5 Code, Section 2461(c); Title 18, United States Code, Section 1341, a specified unlawful activity as  
6 defined in Title 18, United States Code, Sections 1956(c)(7)(A) and 1961(1)(B); and Title 21, United  
7 States Code, Section 853(p).

8  
9 **FORFEITURE ALLEGATION TWENTY-ONE**  
Mail Fraud

10 1. The allegations contained in Count Eleven of this Second Superseding Indictment are  
11 hereby realleged and incorporated herein by reference for the purpose of alleging forfeiture pursuant  
12 to the provisions of Title 18, United States Code, Section 982(a)(2)(A).

13 2. Upon a conviction of the felony offenses charged in Count Eleven of this Second  
14 Superseding Indictment,

15 **STEVEN W. GRIMM,**  
16 **EVE E. MAZZARELLA, and**  
**MELISSA R. BEECROFT,**

17 defendants herein, shall forfeit to the United States of America, any property constituting, or derived  
18 from, proceeds obtained directly or indirectly, as a result of violations of Title 18, United States Code,  
19 Section 1341, or a conspiracy to commit such offenses, a criminal forfeiture money judgment up to  
20 \$305,000.00 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 placed beyond the jurisdiction of the court;  
26 d. has been substantially diminished in value; or



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

3 it is the intent of the United States of America, pursuant to Title 21, United States Code, Section  
4 853(p), to seek forfeiture of any properties of the defendants up to \$305,000.00 in United States  
5 Currency.

6 All pursuant to Title 18, United States Code, Section 982(a)(2)(A); Title 18, United States  
7 Code, Section 1341; and Title 21, United States Code, Section 853(p).

8 **FORFEITURE ALLEGATION TWENTY-TWO**

9 Mail Fraud

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

14 2. Upon conviction of the felony offenses charged in Count Eleven of this Second  
15 Superseding Indictment,

16 **STEVEN W. GRIMM,**  
17 **EVE E. MAZZARELLA, and**  
**MELISSA R. BEECROFT,**

18 defendants herein, shall forfeit to the United States of America, any property which constitutes or is  
19 derived from proceeds traceable to violations of Title 18, United States Code, Section 1341, a specified  
20 unlawful activity as defined in Title 18, United States Code, Sections 1956(c)(7)(A) and 1961(1)(B),  
21 or a conspiracy to commit such offense, a criminal forfeiture money judgment up to \$305,000.00 in  
22 United States Currency.

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

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

it is the intent of the United States of America, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any properties of the defendants up to \$305,000.00 in United States Currency.

All pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c); Title 18, United States Code, Section 1341, a specified unlawful activity as defined in Title 18, United States Code, Sections 1956(c)(7)(A) and 1961(1)(B); and Title 21, United States Code, Section 853(p).

**FORFEITURE ALLEGATION TWENTY-THREE**

Mail Fraud

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

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

**STEVEN W. GRIMM,  
EVE E. MAZZARELLA, and  
MELISSA R. BEECROFT,**

defendants herein, shall forfeit to the United States of America, any property constituting, or derived from, proceeds obtained directly or indirectly, as a result of violations of Title 18, United States Code, Section 1341, or a conspiracy to commit such offenses, a criminal forfeiture money judgment up to \$315,000.00 in United States Currency.

3. If any property being subject to forfeiture pursuant to Title 18, United States Code, Section 982(a)(2)(A), 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 placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States of America, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any properties of the defendants up to \$315,000.00 in United States Currency.

All pursuant to Title 18, United States Code, Section 982(a)(2)(A); Title 18, United States Code, Section 1341; and Title 21, United States Code, Section 853(p).

**FORFEITURE ALLEGATION TWENTY-FOUR**  
Mail Fraud

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

2. Upon conviction of the felony offenses charged in Count Twelve of this Second Superseding Indictment,

**STEVEN W. GRIMM,  
EVE E. MAZZARELLA, and  
MELISSA R. BEECROFT,**

defendants herein, shall forfeit to the United States of America, any property which constitutes or is derived from proceeds traceable to violations of Title 18, United States Code, Section 1341, a specified unlawful activity as defined in Title 18, United States Code, Sections 1956(c)(7)(A) and 1961(1)(B),

1 or a conspiracy to commit such offense, a criminal forfeiture money judgment up to \$315,000.00 in  
 2 United States Currency.

3 3. If any property subject to forfeiture pursuant to Title 18, United States Code, Section  
 4 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), as a result of any act or omission of  
 5 the defendants -

- 6 a. cannot be located upon the exercise of due diligence;
- 7 b. has been transferred or sold to, or deposited with, a third party;
- 8 c. has been placed beyond the jurisdiction of the court;
- 9 d. has been substantially diminished in value; or
- 10 e. has been commingled with other property which cannot be divided without  
 11 difficulty;

12 it is the intent of the United States of America, pursuant to Title 21, United States Code, Section  
 13 853(p), to seek forfeiture of any properties of the defendants up to \$315,000.00 in United States  
 14 Currency.

15 All pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States  
 16 Code, Section 2461(c); Title 18, United States Code, Section 1341, a specified unlawful activity as  
 17 defined in Title 18, United States Code, Sections 1956(c)(7)(A) and 1961(1)(B); and Title 21, United  
 18 States Code, Section 853(p).

19 **FORFEITURE ALLEGATION TWENTY-FIVE**

20 Wire Fraud

21 1. The allegations contained in Count Thirteen of this Second Superseding Indictment  
 22 are hereby realleged and incorporated herein by reference for the purpose of alleging forfeiture pursuant  
 23 to the provisions of Title 18, United States Code, Section 982(a)(2)(A).

24 2. Upon a conviction of the felony offenses charged in Count Thirteen of this Second  
 25 Superseding Indictment,

26 . . .

1                                   **STEVEN W. GRIMM,**  
2                                   **EVE E. MAZZARELLA, and**  
3                                   **MELISSA R. BEECROFT,**

4 defendants herein, shall forfeit to the United States of America, any property constituting, or derived  
5 from, proceeds obtained directly or indirectly, as a result of violations of Title 18, United States Code,  
6 Section 1343, or a conspiracy to commit such offenses, a criminal forfeiture money judgment up to  
\$325,0000.00 in United States Currency.

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

- 9                   a.       cannot be located upon the exercise of due diligence;  
10                  b.       has been transferred or sold to, or deposited with, a third party;  
11                  c.       has been place beyond the jurisdiction of the court;  
12                  d.       has been substantially diminished in value; or  
13                  e.       has been commingled with other property which cannot be divided without  
14                       difficulty;

15 it is the intent of the United States of America, pursuant to Title 21, United States Code, Section  
16 853(p), to seek forfeiture of any properties of the defendants up to \$325,000.00 in United States  
17 Currency.

18           All pursuant to Title 18, United States Code, Section 982(a)(2)(A); Title 18, United States  
19 Code, Section 1343; and Title 21, United States Code, Section 853(p).

20                                   **FORFEITURE ALLEGATION TWENTY-SIX**  
21                                   Wire Fraud

22           1.       The allegations contained in Count Thirteen of this Second Superseding Indictment  
23 are hereby realleged and incorporated herein by reference for the purpose of alleging forfeiture pursuant  
24 to the provisions of Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States  
25 Code, Section 2461(c).

2. Upon conviction of the felony offenses charged in Count Thirteen of this Second Superseding Indictment,

**STEVEN W. GRIMM,  
EVE E. MAZZARELLA, and  
MELISSA R. BEECROFT,**

defendants herein, shall forfeit to the United States of America, any property which constitutes or is derived from proceeds traceable to violations of Title 18, United States Code, Section 1343, a specified unlawful activity as defined in Title 18, United States Code, Sections 1956(c)(7)(A) and 1961(1)(B), or a conspiracy to commit such offense, a criminal forfeiture money judgment up to \$325,000.00 in United States Currency.

3. If any property 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 placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States of America, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any properties of the defendants up to \$325,000.00 in United States Currency.

All pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c); Title 18, United States Code, Section 1343, a specified unlawful activity as defined in Title 18, United States Code, Sections 1956(c)(7)(A) and 1961(1)(B); and Title 21, United States Code, Section 853(p).

**FORFEITURE ALLEGATION TWENTY-SEVEN**

**Wire Fraud**

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3 1. The allegations contained in Count Fourteen of this Second Superseding Indictment  
4 are hereby realleged and incorporated herein by reference for the purpose of alleging forfeiture pursuant  
5 to the provisions of Title 18, United States Code, Section 982(a)(2)(A).

6 2. Upon a conviction of the felony offenses charged in Count Fourteen of this Second  
7 Superseding Indictment,

8 **STEVEN W. GRIMM,**  
9 **EVE E. MAZZARELLA, and**  
**MELISSA R. BEECROFT,**

10 defendants herein, shall forfeit to the United States of America, any property constituting, or derived  
11 from, proceeds obtained directly or indirectly, as a result of violations of Title 18, United States Code,  
12 Section 1343, or a conspiracy to commit such offenses, a criminal forfeiture money judgment up to  
13 \$460,000.00 in United States Currency.

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

- 16 a. cannot be located upon the exercise of due diligence;  
17 b. has been transferred or sold to, or deposited with, a third party;  
18 c. has been place beyond the jurisdiction of the court;  
19 d. has been substantially diminished in value; or  
20 e. has been commingled with other property which cannot be divided without  
21 difficulty;

22 it is the intent of the United States of America, pursuant to Title 21, United States Code, Section  
23 853(p), to seek forfeiture of any properties of the defendants up to \$460,000.00 in United States  
24 Currency.

25 All pursuant to Title 18, United States Code, Section 982(a)(2)(A); Title 18, United States  
26 Code, Section 1343; and Title 21, United States Code, Section 853(p).

**FORFEITURE ALLEGATION TWENTY-EIGHT**

**Wire Fraud**

1  
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3       1.       The allegations contained in Count Fourteen of this Second Superseding Indictment  
4 are hereby realleged and incorporated herein by reference for the purpose of alleging forfeiture pursuant  
5 to the provisions of Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States  
6 Code, Section 2461(c).

7       2.       Upon conviction of the felony offenses charged in Count Fourteen of this Second  
8 Superseding Indictment,

9                       **STEVEN W. GRIMM,**  
10                      **EVE E. MAZZARELLA, and**  
11                      **MELISSA R. BEECROFT,**

12 defendants herein, shall forfeit to the United States of America, any property which constitutes or is  
13 derived from proceeds traceable to violations of Title 18, United States Code, Section 1343, a specified  
14 unlawful activity as defined in Title 18, United States Code, Sections 1956(c)(7)(A) and 1961(1)(B),  
15 or a conspiracy to commit such offense, a criminal forfeiture money judgment up to \$460,000.00 in  
United States Currency.

16       3.       If any property subject to forfeiture pursuant to Title 18, United States Code, Section  
17 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), as a result of any act or omission of  
18 the defendants -

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



1 it is the intent of the United States of America, pursuant to Title 21, United States Code, Section  
2 853(p), to seek forfeiture of any properties of the defendants up to \$460,000.00 in United States  
3 Currency.


4 All pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States  
5 Code, Section 2461(c); Title 18, United States Code, Section 1343, a specified unlawful activity as  
6 defined in Title 18, United States Code, Sections 1956(c)(7)(A) and 1961(1)(B); and Title 21, United  
7 States Code, Section 853(p).

8 **DATED:** this 16 day of February 2011.

9 **A TRUE BILL:**

10 /s/  
11 FOREPERSON OF THE GRAND JURY

12 DANIEL G. BOGDEN  
13 United States Attorney

14   
15 BRIAN PUGH  
16 Assistant United States Attorney