

**FILED**  
**APR 25 2012**  
CLERK, U. S. DISTRICT COURT  
MIDDLE DISTRICT OF FLORIDA  
JACKSONVILLE, FLORIDA

**UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF FLORIDA  
JACKSONVILLE DIVISION**

**UNITED STATES OF AMERICA**

v.

**PATRINA LOTT**

**CASE NO. 3:12-cr-78-JammH-JRK**  
**Cts. 1 - 8: 18 U.S.C. § 1343 and 2**  
**Forfeiture: 18 U.S.C. § 981(a)(1)(C)**  
**28 U.S.C. § 2461(c)**

**INDICTMENT**

The Grand Jury charges:

**COUNTS ONE - EIGHT**

**A. Introduction**

At all times material to this Indictment, unless otherwise specified:

1. On April 20, 2010, the Deepwater Horizon, a semi-submersible offshore oil drilling rig, exploded in the Gulf of Mexico, causing an oil spill ("the oil spill") which lasted for several months. The Deepwater Horizon was leased to BP at the time of the disaster.

2. Following the Deepwater Horizon oil spill, the Gulf Coast Claims Facility ("GCCF") was established to review and process claims for damages arising out of the oil spill.

3. The Garden City Group was the entity of GCCF which handled incoming and outgoing correspondence relating to oil spill claims. In October 2010, the Garden City Group opened a call center in Jacksonville, Florida, to

help manage claims filed with the GCCF.

4. At the time when a claim for damages resulting from the Deepwater Horizon oil spill was processed by GCCF and facilitated by the Jacksonville, Florida call center, the claim could be paid by GCCF by check or by wire transfer.

5. Claims resulting from the Deepwater Horizon oil spill were submitted and caused to be submitted by claimants to GCCF in Dublin, Ohio. Wire transfers and checks generated to satisfy claims were sent by GCCF from Lake Success, New York, to wherever the claimant was located.

6. PATRINA LOTT was a temporary contract employee with the Garden City Group, and worked at the GCCF call center in Jacksonville, Florida. As part of her duties at the call center, LOTT called claimants who had received a check from GCCF, but who had not yet cashed the check.

**B. The Scheme**

Beginning June 17, 2011, and continuing through August 24, 2011, at Jacksonville, in the Middle District of Florida, and elsewhere,

PATRINA LOTT,

the defendant herein, did knowingly and willfully devise and intend to devise a scheme and artifice to defraud and for obtaining money and property by means of materially false and fraudulent pretenses, representations, and promises, and did transmit and cause to be transmitted by means of wire and radio

communication in interstate and foreign commerce, writings, signs, signals, pictures, and sounds for the purpose of executing said scheme and artifice.

**C. Manner and Means of the Scheme**

The manner and means by which the defendant sought to accomplish the scheme included, among others:

1. It was part of the manner and means of the scheme that PATRINA LOTT, the defendant, used her position as a GCCF call center employee to identify victims of the oil spill who had received checks as reimbursement for oil spill damages, but had not yet cashed said checks.
2. It was further a part of the manner and means of the scheme that PATRINA LOTT, the defendant, used her GCCF computer to check the status of claim checks which had been issued by GCCF but not cashed by the claimant.
3. It was further a part of the manner and means of the scheme that PATRINA LOTT, the defendant, entered false and fraudulent information into GCCF database call notes, in which she falsely stated that the claimant had requested a reissue of the previously issued claim payment.
4. It was further a part of the manner and means of the scheme that PATRINA LOTT, the defendant, falsified emails, faxes, and/or correspondence which purported to come from oil spill claimants to GCCF and which did not, in fact, come from claimants.

5. It was further a part of the manner and means of the scheme that PATRINA LOTT, the defendant, caused communications to be sent from Jacksonville, Florida, to GCCF in Dublin, Ohio, to falsely cause the reissuance of previously issued oil spill claims.

6. It was further a part of the manner and means of the scheme that, as a result of PATRINA LOTT's actions, GCCF would and did send a wire transfer from Lake Success, New York, to a bank account designated by LOTT, said bank accounts having no connection or relation to the original claimant.

7. It was further a part of the manner and means of the scheme that PATRINA LOTT, the defendant, would and did obtain funds generated by GCCF wire transfers into bank accounts chosen and designated by LOTT.

**D. Execution of the Scheme**

On or about the dates set forth below, in the Middle District of Florida, and elsewhere, for the purpose of executing and attempting to execute the aforesaid scheme and artifice, the defendant transmitted and caused to be transmitted by means of wire communication in interstate and foreign commerce the following:

COUNT	DATE	NATURE OF WIRE
One	6/17/11	\$24,743.06 sent from Lake Success, NY, to Urban Bank and Trust account *****2849, in the name "KW", at Jacksonville Beach, FL, re the claim of "DV"
Two	7/12/11	\$11,342.56 sent from Lake Success, NY, to Urban Bank and Trust account *****2849, in the name "KW", at Jacksonville Beach, FL, re the claim of "MA"
Three	8/18/11	\$15,042.56 sent from Lake Success, NY, to Urban Bank and Trust account *****2849, in the name "KW", at Jacksonville Beach, FL, re the claim of "MA"
Four	6/23/11	\$6,000.00 sent from Lake Success, NY, to Urban Bank and Trust account *****2849, in the name "KW", at Jacksonville Beach, FL, re the claim of "SS"
Five	7/27/11	\$2,115.96 sent from Lake Success, NY, to Regions Bank account *****0722, in the name "NG", at Jacksonville, FL, re the claim of "HB"
Six	8/2/11	\$8,651.60 sent from Lake Success, NY, to Regions Bank account *****0722, in the name "NG", at Jacksonville, FL, re the claim of "DT"
Seven	8/4/11	\$14,084.20 sent from Lake Success, NY, to Regions Bank account *****0722, in the name "NG", at Jacksonville, FL, re the claim of "JL"
Eight	8/24/11	\$9,932.44 sent from Lake Success, NY, to Bank of America account *****164, in the name "TW", at Jacksonville, FL, re the claim of "AL"

All in violation of Title 18, United States Code, Section 1343 and 2.

## **FORFEITURES**

1. The allegations contained in Counts One through Eight of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

2. Upon conviction of the offenses in violation of Title 18, United States Code, Section 1343 set forth in Counts One through Eight of this Indictment, the defendant, PATRINA LOTT, shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the offenses. The property to be forfeited includes, but is not limited to, a sum of money equal to no less than \$91,912.38 in United States currency, representing the amount of proceeds obtained as a result of the offenses.


3. If any of the property described above, as a result of any act or omission of the defendant:

- 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,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

All pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c).

A TRUE BILL,

  
\_\_\_\_\_  
Foreperson

ROBERT E. O'NEILL  
United States Attorney

By:   
Kathleen O'Malley  
Assistant United States Attorney

By:   
Mac D. Heavener, III  
Assistant United States Attorney  
Deputy Chief, Jacksonville Division

No.

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**UNITED STATES DISTRICT COURT**

Middle District of Florida  
Jacksonville Division

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THE UNITED STATES OF AMERICA

vs.

PATRINA LOTT

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**INDICTMENT**

Violations:

Counts 1 - 8:            18 U.S.C. § 1343

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A true bill,

  
\_\_\_\_\_  
Foreperson

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Filed in open court this 25<sup>th</sup> day

of April, 2012.

  
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Deputy Clerk

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Bail \$ \_\_\_\_\_