

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA	:	Honorable Robert B. Kugler
	:	
v.	:	Crim. No. 11-740-12
	:	
LISA MARIE SCARFO	:	
a/k/a "Lisa Murray-Scarfo"	:	Title 18 U.S.C. § 371

SUPERSEDING INFORMATION

The defendant having waived in open court prosecution by indictment, the United States Attorney for the District of New Jersey charges:

1. From in or about January 2008 through in or about March 2008, in the District of New Jersey and elsewhere, the defendant,

LISA MARIE SCARFO,  
also known as "Lisa Murray-Scarfo,"

and Nicodemo S. Scarfo, also known as "Nicky," also known as "Nick," also known as "Cousin," also known as "Junior," also known as "Nick Promo," also known as "Mr. Apple," also known as "Mr. Macintosh"; Salvatore Pelullo, also known as "Sal," also known as "The Consultant," also known as "Cousin," also known as "Mr. Turner"; William Maxwell, also known as "Bill"; John Maxwell; William Handley, also known as "Bill"; Cory Leshner; John Parisi, also known as "JP"; Howard Drossner; and Donald Manno, also known as "Donny," ("co-conspirators") did knowingly and intentionally conspire and agree with each other and others to commit an offense against the United States, to wit, to make

false statements and reports, for the purpose of influencing the action of a financial institution the accounts of which were insured by the Federal Deposit Insurance Corporation, including St. Edmond's Federal Savings Bank, upon an application, purchase, purchase agreement, commitment, or loan, contrary to Title 18, United States Code, Section 1014.

OBJECT OF THE CONSPIRACY

2. The object of the conspiracy was for defendant LISA MARIE SCARFO and the co-conspirators to obtain a mortgage for a house located at 9 Hartford Drive, Egg Harbor Township, New Jersey ("Egg Harbor house") through false statements and fraudulent submissions to financial institutions, including St. Edmond's Federal Savings Bank.

MANNER AND MEANS OF THE CONSPIRACY

3. It was part of the conspiracy that co-conspirators Drossner, Scarfo, Pelullo, and Parisi caused false income tax returns to be prepared to make defendant LISA MARIE SCARFO appear more creditworthy than she actually was in order to induce the lender to make a loan to LISA MARIE SCARFO.

4. It was further part of the conspiracy that prior to and during the closing, co-conspirator Manno caused documents to be manipulated to show that the source of funds for defendant LISA MARIE SCARFO's purchase of the Egg Harbor house was a "gift" which, in fact, was not true.

OVERT ACTS

5. In furtherance of the conspiracy and to effect its illegal object, the following overt acts, among others, were committed in the District of New Jersey and elsewhere:

a. On or about February 5, 2008, co-conspirator Drossner emailed fraudulent tax returns to co-conspirator Pelullo for use by defendant LISA MARIE SCARFO in securing a \$502,000 mortgage to purchase the Egg Harbor House.

b. On or about February 8, 2008, defendant LISA MARIE SCARFO and co-conspirator Parisi traveled from the District of New Jersey to the Eastern District of Pennsylvania so that LISA MARIE SCARFO could retrieve and sign fictitious tax returns that were ultimately used to support a loan application for the Egg Harbor House.

c. On or about March 6, 2008, co-conspirator Manno sent a letter regarding the source of money used as a down payment on the Egg Harbor House to co-conspirator Pelullo via facsimile from the District of New Jersey to the Eastern District of Pennsylvania.

All in violation of Title 18, United States Code, Section 371.

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PAUL J. FISHMAN  
United States Attorney