

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA : **CRIMINAL NO.** _____
v. : **DATE FILED:** _____
JEAN KROTZ : **VIOLATION:**
: **18 U.S.C. § 157(3) (fraudulent**
: **representation in relation to a bankruptcy**
: **proceeding - 1 count)**

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

Introduction

1. At all times material to this indictment, defendant JEAN KROTZ lived at the residence located at 220 Cardiff Road in Fairless Hills, Pennsylvania.
2. Between in or about July 1996 and in or about December 2002, defendant JEAN KROTZ filed six bankruptcy petitions under Title 11, all in the United States Bankruptcy Court for the Eastern District of Pennsylvania, using the address 220 Cardiff Road, Fairless Hills, Pennsylvania, 19030.
3. On or about August 29, 2003, the United States Bankruptcy Court for the Eastern District of Pennsylvania issued an order barring defendant JEAN KROTZ from filing another bankruptcy petition without prior leave of the bankruptcy court.
4. Between in or about September 2003 and in or about December 2004, James Krotz, defendant JEAN KROTZ's husband, filed four bankruptcy petitions under Title 11,

all in the United States Bankruptcy Court for the Eastern District of Pennsylvania, using the address 220 Cardiff Road, Fairless Hills, Pennsylvania, 19030.

5. On or about February 22, 2005, the United States Bankruptcy Court for the Eastern District of Pennsylvania issued an order barring James Krotz from filing any additional bankruptcy petitions for a period of 180 days.

6. Defendant JEAN KROTZ's home, located at 220 Cardiff Road in Fairless Hills, Pennsylvania, was scheduled to be foreclosed in a sheriff's sale by the Bucks County Sheriff's Department on or about March 12, 2005.

THE SCHEME

7. From on or about March 9, 2005 to on or about April 26, 2005, in the Eastern District of Pennsylvania and elsewhere, defendant

JEAN KROTZ

devised and intended to devise a scheme and artifice to defraud Wilshire Credit Corporation, the mortgagor of the property located at 220 Cardiff Road in Fairless Hills, Pennsylvania.

It was part of the scheme that:

8. On or about March 9, 2005, defendant JEAN KROTZ filed a bankruptcy petition (the "Petition") in the United States Bankruptcy Court for the Eastern District of Pennsylvania, docket number 05-13111, in the name of her minor daughter, Jacqueline Krotz.

9. Between on or about March 9, 2005 and on or about March 11, 2005, defendant JEAN KROTZ altered the Petition to make it look as if the Petition had been filed in her own name.

10. On or about March 11, 2005, defendant JEAN KROTZ sent the altered

Petition via facsimile to the Bucks County, Pennsylvania Sheriff's Department to delay the scheduled foreclosure of her home.

11. Between on or about March 9, 2005 and on or about March 11, 2005, in the Eastern District of Pennsylvania and elsewhere, defendant

JEAN KROTZ

for the purpose of executing the scheme described above, made a false and fraudulent representation, claim and promise concerning and in relation to a proceeding under Title 11, and in relation to a proceeding falsely asserted to be pending under Title 11.

In violation of Title 18, United States Code, Section 157(3).

A TRUE BILL:

FOREPERSON

PATRICK L. MEEHAN
UNITED STATES ATTORNEY