

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

UNITED STATES OF AMERICA	:	CRIMINAL NO. <u>11-_____</u>
v.	:	DATE FILED: <u>February 24, 2011</u>
LORI GRAZIOLA, a/k/a "Lori Parkhurst"	:	VIOLATIONS: 18 U.S.C. § 1341 (mail fraud – 2 counts) Notice of forfeiture

INDICTMENT

COUNTS ONE AND TWO

THE GRAND JURY CHARGES THAT:

At all times material to this indictment:

1. Defendant LORI GRAZIOLA, a/k/a "Lori Parkhurst," owned a residence on Chaps Lane in West Chester, Pennsylvania, where she lived with her husband.
2. Quicken Loans made mortgage, home equity, and other loans to consumers.

THE SCHEME

3. From on or about January 23, 2006, to on or about March 3, 2006, defendant

**LORI GRAZIOLA,
a/k/a "Lori Parkhurst,"**

devised and intended to devise a scheme to defraud, and to obtain money and property by means of false and fraudulent pretenses, representations and promises.

MANNER AND MEANS

It was part of the scheme that:

4. On January 23, 2006, defendant LORI GRAZIOLA submitted to Quicken Loans an application for a \$117,000 home equity line of credit. The applicant was listed as "Lori Parkhurst," which is defendant GRAZIOLA's maiden name. Defendant GRAZIOLA falsely claimed that she had monthly gross income of \$7,000 from her employment. Quicken Loans approved the loan on the condition that defendant GRAZIOLA provide proof that she was employed a minimum of two years in the same line of work and verification of her income.

5. To comply with the condition, defendant LORI GRAZIOLA submitted false documents to Quicken Loans which purported to show that she had incorporated a company called "Direct Loan Leads, LLC" on February 14, 2003, even though she had not done so until February 27, 2006. Defendant GRAZIOLA also falsely claimed to have worked there for three years and had monthly income of \$7,000.

6. In addition, defendant LORI GRAZIOLA submitted a false invoice from a company called "Logo Central" which falsely showed that defendant GRAZIOLA had purchased her residence sometime prior to March 15, 2003, even though she had not purchased the property until October 2004.

7. The loan closed on February 25, 2006, and defendant LORI GRAZIOLA caused Quicken Loans to fund the loan in the amount of \$96,500, with \$46,620.70 payable to defendant GRAZIOLA and \$49,801.03 be payable to Chase Manhattan Mortgage.

8. On or about March 2, 2006, in the Eastern District of Pennsylvania, defendant

LORI GRAZIOLA,

a/k/a "Lori Parkhurst,"

for the purpose of executing the scheme described above knowingly caused to be transmitted by mail the checks described below, each mailing constituting a separate count:

COUNT	DATE	DESCRIPTION
One	March 2, 2006	A check from Title Source, Inc., to Lori Graziola, in the amount of \$46,620.70
Two	March 2, 2006	A check from Title Source, Inc., to Chase Manhattan Mortgage, in the amount of \$49,801.03

All in violation of Title 18, United States Code, Section 1341.

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

1. As a result of the violations of Title 18, United States Code, Section 1341, set forth in this indictment defendant

**LORI GRAZIOLA,
a/k/a "Lori Parkhurst,"**

shall forfeit to the United States of America any property, real or personal, that constitutes or is derived from proceeds traceable to the commission of such offenses.

2. If any of the property subject to forfeiture, as a result of any act or omission of the defendant:

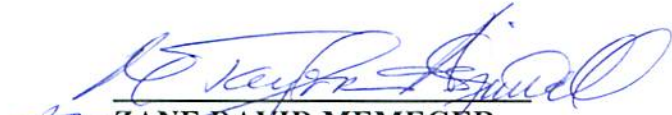
- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 28, United States Code, Section 2461(c), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendants up to the value of the property subject to forfeiture.

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

A TRUE BILL:

GRAND JURY FOREPERSON



ZANE DAVID MEMEGER
United States Attorney