

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

**UNITED STATES OF AMERICA** : **CRIMINAL NO.** \_\_\_\_\_  
v. : **DATE FILED:** \_\_\_\_\_  
**LIZETTE MORICE** : **VIOLATIONS:**  
18 U.S.C. § 1341(mail fraud - 7 counts)  
18 U.S.C. § 1956 (promotional money  
laundering - 7 counts)  
Notice of forfeiture

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**INDICTMENT**

**COUNTS ONE THROUGH SEVEN**

**THE GRAND JURY CHARGES THAT:**

At all times relevant to this indictment:

1. Defendant LIZETTE MORICE was the founder and head of Gaddel Enterprises, Inc., formerly known as JPLM (“Gaddel”), the offices of which were located at 2080 W. Cabot Blvd., Suite 201, Langhorne, Pennsylvania and 201 Woolston Drive, Suite 2E, Morrisville, Pennsylvania.

2. Defendant LIZETTE MORICE falsely represented that these business entities obtained tax-foreclosed properties and resold them at a profit.

**THE SCHEME**

3. From at least in or about April 2006, through in or about July 2007, defendant

**LIZETTE MORICE**

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

4. It was part of the scheme that defendant **LIZETTE MORICE:**
  - a. solicited individuals and caused others to solicit individuals to invest money in Gaddel by falsely representing that:
    - 1) Gaddel purchased properties that were in tax foreclosure, primarily from the State of New Jersey, at a price substantially below the market value of the property, sold the properties to large corporations at substantial profit, and paid investors a portion of this profit; and
    - 2) Gaddel needed investors because, due to state regulations, it could not be named as the purchaser of all of the available properties, and, subsequently;
    - 3) Gaddel did not need investors, but agreed to share in the profits with its investors as a charitable act;
  - b. accepted more than \$7 million from investors based upon the false representations set forth above;
  - c. paid some investors significant returns on their investments, falsely representing that the money was generated by the resale of tax-foreclosed properties, knowing full well that, in fact, no real estate transactions were ever completed by Gaddel and that these investors were paid with money contributed by subsequent investors; and

d. paid investors commissions to recruit other investors, and hired many of these investors to continue to solicit additional investors full-time.

5. On or about the following dates, in the Eastern District of Pennsylvania and elsewhere, defendant

**LIZETTE MORICE,**

for the purpose of executing the scheme described above, and attempting to do so, knowingly caused to be delivered by mail and commercial interstate carriers, according to the directions thereon, the following items:

<b>COUNT</b>	<b>DATE</b>	<b>FROM</b>	<b>TO</b>	<b>DESCRIPTION OF ITEM &amp; HOW SENT</b>
1	2/16/07	Odessa, FL	Morrisville, PA	Two (2) Bank of America Cashier's Checks, #5392852 and #5392853, and ten (10) property receipts Federal Express
2	3/26/07	Morrisville, PA	Marlboro, NJ	Six (6) Gaddel receipts U.S. Mail
3	4/25/07	West Hempstead, NY	Morrisville, PA	U.S. Postal Money Order #11293259567 DHL Express
4	5/17/07	Irmo, SC	Levittown, PA	Bank of America Cashier's Check #0538702 Federal Express
5	6/1/07	Irmo, SC	Langhorne, PA	Bank of America Cashier's Check #0538834 Federal Express

6	7/5/07	West Hempstead, NY	Langhorne, PA	Citibank Official Check #455603084 DHL Express
7	7/24/07	West Hempstead, NY	Langhorne, PA	Citibank Official Check #131145629 U.S.P.S. Express Mail

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

**COUNTS EIGHT THROUGH FOURTEEN**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. Paragraphs 1 through 4 of Count One are incorporated here.
2. On or about the dates set forth below, in the Eastern District of Pennsylvania and elsewhere, defendant

**LIZETTE MORICE**

knowingly conducted, and attempted to conduct, and aided, abetted and willfully caused the following financial transactions affecting interstate commerce:

<i>Count</i>	<i>Date</i>	<i>Amount</i>	<i>Financial Transaction</i>
8	2/20/07	\$10,000	Two (2) Bank of America Cashier's Checks, #5392852 and #5392853, deposited into Gaddel Enterprises Inc., Commerce Bank account #xxxxx7063
9	3/26/07	\$6,000	Bank of America Cashier's Check #0817137, deposited into Gaddel Enterprises Inc., Commerce Bank account #xxxxx7063
10	3/27/07	\$15,000	Debit memo transfer from Commerce Bank account #xxxxx7063 to Commerce account #xxxxx3113
11	4/27/07	\$1,000	U.S. Postal Service Money Order # 11293259567, deposited into Gaddel Enterprises Inc., Commerce Bank account #xxxxx7063
12	4/30/07	\$9,750	Debit memo transfer from Commerce Bank account #xxxxx7063 to Commerce account #xxxxx3135
13	5/18/07	\$10,000	Bank of America Cashier's Check #0538702 deposited into Gaddel Enterprises Inc., Commerce Bank account #xxxxx7063
14	5/18/07	\$1,875.37	Check #20020 written against Gaddel Enterprises Inc., Commerce Bank account #xxxxx7063

3. When conducting, aiding, abetting, and willfully causing the financial

transactions described in paragraph 2 above, defendant knew that the property involved in those financial transactions represented the proceeds of some form of unlawful activity.

4. The financial transactions described in paragraph 2 above involved the proceeds of a specified unlawful activity, that is, mail fraud, in violation of Title 18, United States Code, Section 1341, and defendant acted with the intent to promote the carrying on of the specified unlawful activity.

All in violation of Title 18, United States Code, Sections 1956(a)(1)(A)(i) and 2.

**NOTICE OF FORFEITURE**

**THE GRAND JURY FURTHER CHARGES THAT:**

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

**LIZETTE MORICE**

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, including, but not limited to the following: the sum of approximately Six Million Dollars (\$6,000,000.00).

2. Such property shall include, but not be limited to, the following:

a. Money Judgment. A sum of money equal to at least \$6,000,000 in United States currency, representing the amount of proceeds obtained as a result of the mail fraud charged in Counts One through Seven;

b. Bank Accounts. All funds under the control of the above-named defendant in the following bank accounts at Commerce Bank:

- a. Account # xxxxxx7362, in the name of The Dream Team;
- b. Account # xxxxxx4819, in the name of Dynamic Investing Group;
- c. Account # xxxxxx7063, in the name of Gaddel Enterprises Inc.; and
- d. Account # xxxxxx2982, in the name of Innovative Capital Investments, Inc..

3. 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 of America, pursuant to Title 18, United States Code, Section 981(a)(1)(C), 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 defendant 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:**

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**GRAND JURY FOREPERSON**

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**PATRICK L. MEEHAN**  
**United States Attorney**