



1 DANIEL BOGDEN  
United States Attorney  
2 MICHAEL CHU  
Assistant United States Attorney  
3 333 Las Vegas Blvd. South, Suite 5000  
Las Vegas, Nevada 89101  
4 (702) 388-6336

5 **UNITED STATES DISTRICT COURT**  
6 **DISTRICT OF NEVADA**

7 -oOo-

8 UNITED STATES OF AMERICA,  
9 Plaintiff,  
10 v.  
11 KAREN TAPPERT,  
12 Defendant.

CRIMINAL INDICTMENT  
2:10-CR- 286  
VIOLATIONS:  
18 U.S.C. § 1341 - Mail Fraud  
18 U.S.C. § 1343 - Wire Fraud

13 **THE GRAND JURY CHARGES THAT:**

14 At all times relevant to this Indictment:

15 **Introduction**

16 1. From in or about late 2007, to in or about November 2009, **KAREN TAPPERT**  
17 offered, by word of mouth, a mortgage rescue service, but the way she "rescued" mortgages  
18 was by recording fraudulent deeds that purported to convey the property from the true title  
19 holder to an entity that she controlled. This conduct forms the basis for Counts One to  
20 Three, and involves the following properties:

21 Counts 1-2: 3012 Amari Avenue, Las Vegas, NV 89141

22 Count 3: 1601 Imperial Cup Dr., Las Vegas, NV 89117

23 2. **TAPPERT** also engaged in a "Squatter's scheme" whereby, she squatted on  
24 abandoned properties in which she had no ownership right. From in or around December  
25 2009, to at least February 2010, **TAPPERT** found properties that had already been foreclosed  
26 upon, and filed fraudulent deeds that purported to convey the property from the true title

1 holder to an entity that she controlled. TAPPERT gained use of the property and, if she could,  
2 either rented out the property – or sold it. This conduct forms the basis for Counts Four to  
3 Six, and involves the following properties:

4 Count 4: 32 Via Vasari #28106, Henderson, NV 89011

5 Count 5: 612 Diamond St., Farmington, NM 87401

6 Count 6: 675 Gregory Circle, Corona, CA 92881

7 3. Among the entities that TAPPERT controlled and used to further her scheme  
8 to defraud include: AMARI GROUP, REIFICATION GROUP TRUST, SARALAND INVESTMENTS,  
9 DESCHUTES RIVER TITLE ASSOCIATES, NORTHWEST PROPERTIES ASSOCIATES and NORTHWEST  
10 PROPERTIES ASSOCIATES, ASSET-BACKED CERTIFICATES, SERIES 2006-FF1.

11 4. TAPPERT also controlled "FEDERAL NATIONAL MORTGAGE ASSOCIATION," an  
12 entity that conducted business at 284C East Lake Mead Dr. #173, Henderson, NV 89015,  
13 and which is not related to the identically-named government-sponsored enterprise  
14 chartered by Congress.

15 **COUNTS ONE AND TWO**  
16 **Mail Fraud**

17 5. The allegations set forth in the Introduction are re-alleged and incorporated  
18 by reference.

19 6. On the date identified below, in the State and Federal District of Nevada and  
20 elsewhere,

21 **KAREN TAPPERT,**

22 defendant did devise, intend to devise and willfully participate in, a scheme and artifice to  
23 defraud and for obtaining property and money by means of false and fraudulent pretenses,  
24 representations, and promises.

25 . . .

26 . . .

1                    **Manner and Means of the Fraudulent Mortgage Rescue Scheme**

2                    7.        As part of the "Mortgage Rescue" scheme to defraud, defendant did all of the  
3 following:

4                    **A.        Counts 1 and 2: 3012 Amari Avenue, Las Vegas, NV 89141**

5                    8.        Prior to 2007, E.G. purchased 3012 Amari Avenue, but E.G. fell behind on  
6 mortgage payments and received notice that the mortgage holder intended to foreclose.  
7 E.G. heard that TAPPERT rescued mortgages, so E.G. contacted TAPPERT.

8                    9.        In late 2007 or 2008, E.G. met TAPPERT. TAPPERT explained to E.G. that she  
9 would mail letters to the entities relating to E.G.'s mortgage. E.G. paid TAPPERT \$750.00,  
10 and at TAPPERT's request, allowed TAPPERT to live in 3012 Amari Avenue in lieu of further  
11 payment. E.G. later learned that TAPPERT had rented out this property.

12                    10.       From in or about November 2009 to in or about April 2010, the tenant mailed  
13 rent checks of \$1,000.00 per month to AMARI GROUP.

14                    11.       In or about January 2009, 3012 Amari Avenue was foreclosed upon and title  
15 was conveyed to Deutsche Bank National Trust Company, as trustee under the Pooling and  
16 Servicing Agreement relating to IMPAC Secured Assets Corp., Mortgage Pass-Through  
17 Certificates, Series 2006-2.

18                    12.       On or about April 27, 2009, TAPPERT fraudulently obtained the property by  
19 causing a fraudulent deed to be filed with the Clark County Recorder's Office. This  
20 fraudulent deed purported to convey "Deutsche Bank National Trust Company"'s interest in  
21 the property to REIFICATION GROUP TRUST, an entity that TAPPERT controlled, in exchange for  
22 "Zero (\$0.00)." TAPPERT acted as notary public to notarize the signature of "Arthur L. Davis,"  
23 the purported representative of Deutsche Bank National Trust Co. In reality, however,  
24 Deutsche Bank National Trust Co. did not convey the property to REIFICATION GROUP TRUST,  
25 TAPPERT or any entity controlled by her, nor authorized anyone to do so.

26

1           13.    TAPPERT caused her fraudulent deed to be filed on or about April 27, 2009,  
2 but apparently, it was not recorded in the Clark County real property records. On or about  
3 June 8, 2009, TAPPERT caused the fraudulent deed to be re-filed with the Clark County  
4 Recorder's Office.

5    **B.    Count 3: 1601 Imperial Cup Dr., Las Vegas, NV 89117**

6           14.    Prior to October 2009, 1601 Imperial Cup was owned by K.G., but K.G. fell  
7 behind on mortgage payments and received notice that the mortgage holder intended to  
8 foreclose. K.G. learned that TAPPERT would rescue his mortgage in exchange for \$1,800.00.  
9 K.G. met with a representative of the AMARI GROUP named "Howard." K.G. refused to pay  
10 this fee, but signed a quitclaim deed that "Howard" produced, conveying what rights K.G.  
11 had in this property to the AMARI GROUP.

12           15.    Later, 1601 Imperial Cup was foreclosed upon, and in or about November  
13 2009, title was conveyed to the true Federal National Mortgage Association, more commonly  
14 known as "Fannie Mae."

15           16.    On or about November 21, 2009, TAPPERT caused a fraudulent UCC-1  
16 financing statement to be filed from Nevada with the Washington State Department of  
17 Licensing in Olympia, Washington. This financing statement falsely claimed that Federal  
18 National Mortgage Association owed a \$335,000 debt to the AMARI GROUP and an unindicted  
19 co-conspirator.

20           17.    On or about November 25, 2009, TAPPERT fraudulently obtained the property  
21 by causing a fraudulent deed to be filed with the Clark County Recorder's Office. This  
22 fraudulent deed purported to convey Federal National Mortgage Association's interest in  
23 1601 Imperial Cup to AMARI GROUP. TAPPERT signed the deed, falsely representing herself  
24 as the "authorized agent" for the Federal National Mortgage Association.  
25  
26

1           18. In reality, however, the true Federal National Mortgage Association did not  
2 convey the property to AMARI GROUP, TAPPERT or any entity controlled by her, nor authorized  
3 anyone to do so.

4                           **Manner and Means of the "Squatter's Scheme" to Defraud**

5           19. As part of the "Squatter's scheme" to defraud, defendant did all of the  
6 following:

7           **C. Count 4: 32 Via Vasari #28106, Henderson, NV 89011**

8           20. In or about September 2009, 32 Via Vasari #28106 was foreclosed upon,  
9 and title was conveyed to Deutsche Bank National Trust Company, as trustee of  
10 IndyMac INDX Mortgage Loan Trust 2006-AR-15, Mortgage Pass-Through Certificates,  
11 Series 2006-AR15 under the Pooling and Servicing Agreement dated May 1, 2006.

12           21. On or about December 22, 2009, TAPPERT fraudulently obtained the  
13 property by causing a fraudulent deed to be filed with the Clark County Recorder's  
14 Office. TAPPERT caused this fraudulent deed to be filed online, via SimpliFile, an online  
15 filing system whose servers are located in Utah. In turn, SimpliFile in Utah electronically  
16 filed TAPPERT's fraudulent deed with the Clark County Recorder's Office.

17           22. This fraudulent deed purported to convey IndyMac's interest in 32 Via  
18 Vasari, # 28106 to "FEDERAL NATIONAL MORTGAGE ASSOCIATION," at 284C East Lake  
19 Mead Dr. #173, Henderson, NV, an entity and address that TAPPERT controlled.

20           23. Unlike the true Federal National Mortgage Association (more commonly  
21 known as "Fannie Mae"), TAPPERT's "FEDERAL NATIONAL MORTGAGE ASSOCIATION" is not  
22 related to the identically-named government-sponsored enterprise chartered by  
23 Congress.

24           24. TAPPERT signed the fraudulent deed, falsely representing herself as the  
25 "authorized agent" for Deutsche Bank National Trust Co. In reality, however, the true  
26 Deutsche Bank National Trust Co. did not convey the property to the "FEDERAL NATIONAL

1 MORTGAGE ASSOCIATION," TAPPERT or any entity controlled by her, nor authorized anyone  
2 to do so.

3 **D. Count 5: 612 Diamond St., Farmington, NM 87401**

4 25. In or about September 2009, 612 Diamond St. was foreclosed upon, and  
5 title was conveyed to Deutsche Bank National Trust Company, as trustee for Saxon  
6 Asset Securities Trust 2007-2.

7 26. On or about December 18, 2009, TAPPERT fraudulently obtained the  
8 property by causing a fraudulent deed to be filed with the San Juan County Clerk's  
9 Office. TAPPERT caused this deed to be filed via SimpliFile, the online filing system  
10 whose servers are located in Utah. In turn, SimpliFile in Utah electronically filed  
11 TAPPERT's fraudulent deed with the Clark County Recorder's Office.

12 27. This fraudulent deed purported to convey the interest of Deutsche Bank  
13 National Trust Company, as trustee for Saxon Asset Securities Trust 2007-2 in 612  
14 Diamond St. to SARALAND INVESTMENTS, an entity controlled by TAPPERT. Although a  
15 "Henry Malchovich, Special Master," purported to sign the deed for Deutsche Bank  
16 National Trust Co., TAPPERT signed the deed as notary public.

17 28. In reality, the true Deutsche Bank National Trust Co. did not convey the  
18 property to SARALAND INVESTMENTS, TAPPERT or any entity controlled by her, nor  
19 authorized anyone to do so.

20 29. Subsequently, TAPPERT rented out the property, in return for a one-time  
21 fee of \$4,050.

22 **E. Count 6: 675 Gregory Circle, Corona, CA 92881**

23 30. Prior to in or about February 2010, 675 Gregory Circle was foreclosed  
24 upon, and title was eventually conveyed to ReconTrust Company, N.A.  
25  
26

1           31. On or about February 16, 2010, TAPPERT fraudulently obtained the  
2 property by causing a fraudulent deed to be filed with the Riverside County Assessor-  
3 County Clerk-Recorder's Office.

4           32. This fraudulent deed purported to convey the interest of "Recon Trust  
5 Company N.A." [sic] in 675 Gregory Circle to "NORTHWEST PROPERTIES ASSOCIATES,  
6 ASSET-BACKED CERTIFICATES, SERIES 2006-FF1," an entity controlled by TAPPERT. A  
7 "Joseph Michaels," purported to sign the deed on behalf of "Recon Trust Company N.A."  
8 In reality, the true ReconTrust Company N.A. did not convey the property to "NORTHWEST  
9 PROPERTIES ASSOCIATES, ASSET-BACKED CERTIFICATES, SERIES 2006-FF1," TAPPERT or  
10 any entity controlled by her, nor authorized anyone to do so.

11           33. Subsequently, TAPPERT caused the property to be sold. On or about  
12 February 20, 2010, TAPPERT, on behalf of "NORTHWEST PROPERTIES ASSOCIATES,"  
13 entered into an agreement to sell this property for \$490,000.

14           34. This sale closed on or about March 12, 2010. TAPPERT, on behalf of  
15 "NORTHWEST PROPERTIES ASSOCIATES," caused the escrow company to disburse this  
16 \$490,000 to several of TAPPERT's nominees. For example, on or about March 12, 2010,  
17 \$60,000.00 of the proceeds was wired from the escrow company in California to  
18 DESCHUTES RIVER TITLE ASSOCIATES of Nevada, Bank of America account xxxx-xxxx-  
19 7755.

20           35. In or about the dates described below, in the State and Federal District of  
21 Nevada, for the purpose of executing and attempting to execute the scheme and artifice,  
22 Defendant TAPPERT did knowingly place in any post office and authorized depository for  
23 mail matter, to be sent and delivered by the Postal Service; did knowingly deposit and  
24 cause to be deposited to be sent and delivered by any private and commercial interstate  
25 carrier; did knowingly take and receive from an authorized depository for mail; and did  
26 knowingly cause to be delivered by mail and such carrier according to the direction

1 thereon, and at the place at which it was directed to be delivered by the person to whom  
 2 it was addressed, the following matter:

Count	Date	Mailing
1	November 2009	A rent check of \$1,000.00 from tenant M.C. to the AMARI GROUP, an entity controlled by TAPPERT.
2	December 2009	A rent check of \$1,000.00 from tenant M.C. to the AMARI GROUP, an entity controlled by TAPPERT.

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

9 **COUNTS THREE TO SIX**  
 Wire Fraud

11 36. The allegations set forth in the Introduction and Counts One and Two are  
 12 re-alleged and incorporated herein.

13 37. On or about the dates identified below, in the State and Federal District of  
 14 Nevada and elsewhere,

15 **KAREN TAPPERT,**

16 defendant herein, did devise and intend to devise, and participate in a scheme and  
 17 artifice to defraud and for obtaining money and property by means of materially false and  
 18 fraudulent pretenses, representations and promises, and for the purpose of executing  
 19 the scheme did cause to be transmitted by means of wire communication in interstate  
 20 commerce the following writings, signs, signals, and sounds, with each transmission  
 21 constituting a separate violation of Title 18, United States Code, Section 1343:

22 . . .  
 23 . . .  
 24 . . .  
 25 . . .  
 26 . . .

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26

Count	Date	Wire
3	November 25, 2009	Debit card payment for online filing of fraudulent UCC-1 with Washington State Department of Licensing, sent from Nevada to Bank of America account, xxxx-xxxx-6853.
4	December 22, 2009	Online filing of fraudulent deed, sent from SimpliFile in Utah to Clark County Recorder's Office in Nevada.
5	December 18, 2009	Online filing of fraudulent deed, sent from SimpliFile in Utah to San Juan County Clerk's Office in New Mexico.
6	March 12, 2010	Wire transfer of \$60,000.00 sent from Castlehead Inc. Escrow of California to DESCHUTES RIVER TITLE ASSOCIATES of Nevada, Bank of America account xxxx-xxxx-7755.

. . .  
. . .  
. . .  
. . .  
. . .  
. . .  
. . .  
. . .  
. . .  
. . .  
. . .  
. . .  
. . .  
. . .  
. . .  
. . .  
. . .



1 pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States  
2 Code, Section 2461(c); Title 18, United States Code, Section 1341, a specified unlawful  
3 activity as defined in Title 18, United States Code, Sections 1956(c)(7)(A) and 1961(1)(B);  
4 and Title 21, United States Code, Section 853(p).

5 **FORFEITURE ALLEGATION TWO**  
6 **Mail Fraud**

7 1. The allegation of Counts One and Two of this Indictment are hereby  
8 realleged and incorporated herein by reference for the purpose of alleging forfeiture  
9 pursuant to the provision of Title 18, United States Code, Section 982(a)(2)(A).

10 2. Upon a conviction of the felony offense charged in Counts One and Two of  
11 this Indictment,

12 **KAREN TAPPERT,**

13 defendant herein, shall forfeit to the United States of America any property constituting, or  
14 derived from, proceeds obtained directly or indirectly as the result of such violations of Title  
15 18, United States Code, Section 1341, or a conspiracy to commit such offense, an *in*  
16 *personam* criminal forfeiture money judgment up to \$127,009.11 in United States Currency.

17 If any property being subject to forfeiture pursuant to Title 18, United States Code,  
18 Section 982(a)(2)(A), as a result of any act or omission of the defendants –

- 19 a. cannot be located upon the exercise of due diligence;  
20 b. has been transferred or sold to, or deposited with, a third party;  
21 c. has been placed beyond the jurisdiction of the court;  
22 d. has been substantially diminished in value; or  
23 e. has been commingled with other property that cannot be divided without  
24 difficulty;

1 it is the intent of the United States of America, pursuant to Title 21, United States Code,  
2 Section 853(p), to seek forfeiture of any properties of the defendants for an *in personam*  
3 criminal forfeiture money judgment up to \$127,009.11 in United States Currency.

4 All pursuant to Title 18, United States Code, Sections 982(a)(2)(A) and 1341; and  
5 Title 21, United States Code, Section 853(p).

6 **FORFEITURE ALLEGATION THREE**  
7 **Wire Fraud**

8 1. The allegation of Count Three of this Indictment is hereby realleged and  
9 incorporated herein by reference for the purpose of alleging forfeiture pursuant to the  
10 provisions of Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States  
11 Code, Section 2461(c).

12 2. Upon a conviction of the felony offense charged in Count Three of this  
13 Indictment,

14 **KAREN TAPPERT,**

15 defendant herein, shall forfeit to the United States of America, any property which  
16 constitutes or is derived from proceeds traceable to violations of Title 18, United States  
17 Code, Section 1343, a specified unlawful activity as defined in Title 18, United States Code,  
18 Sections 1956(c)(7)(A) and 1961(1)(B), or a conspiracy to commit such offense, an *in*  
19 *personam* criminal forfeiture money judgment up to \$261,011.67 in United States Currency.

20 3. If any property being subject to forfeiture pursuant to Title 18, United States  
21 Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), as a result  
22 of any act or omission of the defendant –

- 23 a. cannot be located upon the exercise of due diligence;  
24 b. has been transferred or sold to, or deposited with, a third party;  
25 c. has been placed beyond the jurisdiction of the court;  
26 d. has been substantially diminished in value; or

1 e. has been commingled with other property that cannot be divided without  
2 difficulty;

3 it is the intent of the United States of America, pursuant to Title 21, United States Code,  
4 Section 853(p), to seek forfeiture of any properties of the defendants for an *in personam*  
5 criminal forfeiture money judgment up to \$261,011.67 in United States Currency.

6 All pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28,  
7 United States Code, Section 2461(c); Title 18, United States Code, Section 1343, a  
8 specified unlawful activity as defined in Title 18, United States Code, Sections 1956(c)(7)(A)  
9 and 1961(1)(B); and Title 21, United States Code, Section 853(p).

10 **FORFEITURE ALLEGATION FOUR**  
11 **Wire Fraud**

12 1. The allegation of Count Three of this Indictment is hereby realleged and  
13 incorporated herein by reference for the purpose of alleging forfeiture pursuant to the  
14 provision of Title 18, United States Code, Section 982(a)(2)(A).

15 2. Upon a conviction of the felony offense charged in Count Three of this  
16 Indictment,

17 **KAREN TAPPERT,**

18 defendant herein, shall forfeit to the United States of America any property constituting, or  
19 derived from, proceeds obtained directly or indirectly as the result of such violations of Title  
20 18, United States Code, Section 1343, or a conspiracy to commit such offense, an *in*  
21 *personam* criminal forfeiture money judgment up to \$261,011.67 in United States Currency.

22 If any property being subject to forfeiture pursuant to Title 18, United States Code,  
23 Section 982(a)(2)(A), as a result of any act or omission of the defendants –

- 24 a. cannot be located upon the exercise of due diligence;  
25 b. has been transferred or sold to, or deposited with, a third party;  
26 c. has been placed beyond the jurisdiction of the court;  
d. has been substantially diminished in value; or

1 e. has been commingled with other property that cannot be divided without  
2 difficulty;

3 it is the intent of the United States of America, pursuant to Title 21, United States Code,  
4 Section 853(p), to seek forfeiture of any properties of the defendants for an *in personam*  
5 criminal forfeiture money judgment up to \$261,011.67 in United States Currency.

6 All pursuant to Title 18, United States Code, Sections 982(a)(2)(A) and 1343; and  
7 Title 21, United States Code, Section 853(p).

8 **FORFEITURE ALLEGATION FIVE**  
9 **Wire Fraud**

10 1. The allegation of Count Four of this Indictment is hereby realleged and  
11 incorporated herein by reference for the purpose of alleging forfeiture pursuant to the  
12 provisions of Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States  
13 Code, Section 2461(c).

14 2. Upon a conviction of the felony offense charged in Count Four of this  
15 Indictment,

16 **KAREN TAPPERT,**

17 defendant herein, shall forfeit to the United States of America, any property which  
18 constitutes or is derived from proceeds traceable to violations of Title 18, United States  
19 Code, Section 1343, a specified unlawful activity as defined in Title 18, United States Code,  
20 Sections 1956(c)(7)(A) and 1961(1)(B), or a conspiracy to commit such offense, an *in*  
21 *personam* criminal forfeiture money judgment up to \$108,750.00 in United States Currency.

22 3. If any property being subject to forfeiture pursuant to Title 18, United States  
23 Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), as a result  
24 of any act or omission of the defendant –

25 a. cannot be located upon the exercise of due diligence;

26 b. has been transferred or sold to, or deposited with, a third party;

- 1 c. has been placed beyond the jurisdiction of the court;
- 2 d. has been substantially diminished in value; or
- 3 e. has been commingled with other property that cannot be divided without
- 4 difficulty;

5 it is the intent of the United States of America, pursuant to Title 21, United States Code,  
6 Section 853(p), to seek forfeiture of any properties of the defendants for an *in personam*  
7 criminal forfeiture money judgment up to \$108,750.00 in United States Currency.

8 All pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28,  
9 United States Code, Section 2461(c); Title 18, United States Code, Section 1343, a  
10 specified unlawful activity as defined in Title 18, United States Code, Sections 1956(c)(7)(A)  
11 and 1961(1)(B); and Title 21, United States Code, Section 853(p).

12 **FORFEITURE ALLEGATION SIX**  
13 **Wire Fraud**

14 1. The allegation of Count Four of this Indictment is hereby realleged and  
15 incorporated herein by reference for the purpose of alleging forfeiture pursuant to the  
16 provision of Title 18, United States Code, Section 982(a)(2)(A).

17 2. Upon a conviction of the felony offense charged in Count Four of this  
18 Indictment,

19 **KAREN TAPPERT,**

20 defendant herein, shall forfeit to the United States of America any property constituting, or  
21 derived from, proceeds obtained directly or indirectly as the result of such violations of Title  
22 18, United States Code, Section 1343, or a conspiracy to commit such offense, an *in*  
23 *personam* criminal forfeiture money judgment up to \$108,750.00 in United States Currency.

24 If any property being subject to forfeiture pursuant to Title 18, United States Code,  
25 Section 982(a)(2)(A), as a result of any act or omission of the defendants –

26 . . . .

- 1 a. cannot be located upon the exercise of due diligence;
- 2 b. has been transferred or sold to, or deposited with, a third party;
- 3 c. has been placed beyond the jurisdiction of the court;
- 4 d. has been substantially diminished in value; or
- 5 e. has been commingled with other property that cannot be divided without  
6 difficulty;

7 it is the intent of the United States of America, pursuant to Title 21, United States Code,  
8 Section 853(p), to seek forfeiture of any properties of the defendants for an *in personam*  
9 criminal forfeiture money judgment up to \$108,750.00 in United States Currency.

10 All pursuant to Title 18, United States Code, Sections 982(a)(2)(A) and 1343; and  
11 Title 21, United States Code, Section 853(p).

12 **FORFEITURE ALLEGATION SEVEN**  
13 **Wire Fraud**

14 1. The allegation of Count Five of this Indictment is hereby realleged and  
15 incorporated herein by reference for the purpose of alleging forfeiture pursuant to the  
16 provisions of Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States  
17 Code, Section 2461(c).

18 2. Upon a conviction of the felony offense charged in Count Five of this  
19 Indictment,

20 **KAREN TAPPERT,**

21 defendant herein, shall forfeit to the United States of America, any property which  
22 constitutes or is derived from proceeds traceable to violations of Title 18, United States  
23 Code, Section 1343, a specified unlawful activity as defined in Title 18, United States Code,  
24 Sections 1956(c)(7)(A) and 1961(1)(B), or a conspiracy to commit such offense, an *in*  
25 *personam* criminal forfeiture money judgment up to \$293,250.00 in United States Currency.  
26



1 18, United States Code, Section 1343, or a conspiracy to commit such offense, an *in*  
2 *personam* criminal forfeiture money judgment up to \$293,250.00 in United States Currency.

3 If any property being subject to forfeiture pursuant to Title 18, United States Code,  
4 Section 982(a)(2)(A), as a result of any act or omission of the defendants –

- 5 a. cannot be located upon the exercise of due diligence;  
6 b. has been transferred or sold to, or deposited with, a third party;  
7 c. has been placed beyond the jurisdiction of the court;  
8 d. has been substantially diminished in value; or  
9 e. has been commingled with other property that cannot be divided without  
10 difficulty;

11 it is the intent of the United States of America, pursuant to Title 21, United States Code,  
12 Section 853(p), to seek forfeiture of any properties of the defendants for an *in personam*  
13 criminal forfeiture money judgment up to \$293,250.00 in United States Currency.

14 All pursuant to Title 18, United States Code, Sections 982(a)(2)(A) and 1343; and  
15 Title 21, United States Code, Section 853(p).

16 **FORFEITURE ALLEGATION NINE**  
17 **Wire Fraud**

18 1. The allegation of Count Six of this Indictment is hereby realleged and  
19 incorporated herein by reference for the purpose of alleging forfeiture pursuant to the  
20 provisions of Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States  
21 Code, Section 2461(c).

22 2. Upon a conviction of the felony offense charged in Count Six of this  
23 Indictment,

24 **KAREN TAPPERT,**

25 defendant herein, shall forfeit to the United States of America, any property which  
26 constitutes or is derived from proceeds traceable to violations of Title 18, United States

1 Code, Section 1343, a specified unlawful activity as defined in Title 18, United States Code,  
2 Sections 1956(c)(7)(A) and 1961(1)(B), or a conspiracy to commit such offense, an *in*  
3 *personam* criminal forfeiture money judgment up to \$490,000.00 in United States Currency.

4 3. If any property being subject to forfeiture pursuant to Title 18, United States  
5 Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), as a result  
6 of any act or omission of the defendant –

- 7 a. cannot be located upon the exercise of due diligence;  
8 b. has been transferred or sold to, or deposited with, a third party;  
9 c. has been placed beyond the jurisdiction of the court;  
10 d. has been substantially diminished in value; or  
11 e. has been commingled with other property that cannot be divided without  
12 difficulty;

13 it is the intent of the United States of America, pursuant to Title 21, United States Code,  
14 Section 853(p), to seek forfeiture of any properties of the defendants for an *in personam*  
15 criminal forfeiture money judgment up to \$490,000.00 in United States Currency.

16 All pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28,  
17 United States Code, Section 2461(c); Title 18, United States Code, Section 1343, a  
18 specified unlawful activity as defined in Title 18, United States Code, Sections 1956(c)(7)(A)  
19 and 1961(1)(B); and Title 21, United States Code, Section 853(p).

20 **FORFEITURE ALLEGATION TEN**  
21 **Wire Fraud**

22 1. The allegation of Count Six of this Indictment is hereby realleged and  
23 incorporated herein by reference for the purpose of alleging forfeiture pursuant to the  
24 provision of Title 18, United States Code, Section 982(a)(2)(A).

25 2. Upon a conviction of the felony offense charged in Count Six of this  
26 Indictment,

