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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON

UNITED STATES OF AMERICA,)
)
 Plaintiff,)
)
 v.)
)
 LEE HOWLETT)
)
 Defendant.)

NO. CR 08-CR '08-288 JU
INFORMATION
[18 U.S.C. § 371]

THE UNITED STATE ATTORNEY CHARGES:

Count 1
Conspiracy

1. Beginning in about 2002 and continuing to about 2006, in the State and District of Oregon, **LEE HOWLETT (HOWLETT)** defendant herein, and others known and unknown to the grand jury, did willfully and knowingly, combine, conspire, confederate and agree together to commit the following offenses against the United States:

- a) Wire fraud in violation of Title 18, United States Code, Section 1343;
- b) Aggravated Identity Theft in violation of Title 18, United States Code, Section 1028A;
- c) Money Laundering in violation of Title 18, United States Code, Section 1957.

Manner and Means

2. a. **HOWLETT** arranged for the purchase of real property in the name of co-conspirators;
- b. **HOWLETT** caused false information to be given to mortgage lenders in applications for mortgage loans by co-conspirators to induce lenders to approve mortgage loans on subject properties;
- c. **HOWLETT** created and submitted false appraisal reports for subject properties and signed the reports using the name and license number of a licensed appraiser without the appraiser's knowledge or authority;
- d. **HOWLETT** fraudulently inflated the appraisal value of subject properties and used the higher value to apply for larger loans, taking the excess funds for his own use and/or to share with co-conspirators;
- e. **HOWLETT** caused the sale of subject properties and/or defaulted on the subject mortgages;
- f. **HOWLETT** caused interstate wire transmissions for communications and the transfer of funds;
- g. **HOWLETT** caused financial transactions involving the proceeds of the loans obtained by fraud.

3. **Overt acts**

1. On about June 17, 2003, **HOWLETT** caused a wire transfer of \$266,823.91 from Tucson, Arizona to Lake Oswego, Oregon.

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2. On about August 4, 2003, **HOWLETT** caused a wire transfer of \$270,887.27 from Tucson, Arizona to Lake Oswego, Oregon.
3. On about June 26, 2003, **HOWLETT** caused the deposit of \$15,348.00 into a Wells Fargo checking account with the last four digits 4622.
4. On about August 18, 2003, **HOWLETT** caused the deposit of \$137,706.20 into a Wells Fargo checking account with the last four digits 6046.
5. In about August, 2004, **HOWLETT** caused a false appraisal report with a false and forged signature of a licensed appraiser known to the United States Attorney, and including the appraisal license number of said appraiser, to be submitted to a lender in support of a mortgage loan application.

DATED this 18 day of June 2008.

KARIN J. JIMMERT
United States Attorney



LANSE CALDWELL, OSB #77404
Assistant United States Attorney