

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
WESTERN DIVISION

MORTGAGE LENDERS NETWORK,) CASE NO. 3:04CV7767
INC.)
) JUDGE JACK ZOUHARY
Plaintiff,)
)
v.)
) **AMENDED COMPLAINT**
ADKINS APPRAISAL SERVICES, INC.,) **(JURY DEMAND ENDORSED)**
et al.,)
)
Defendants.

Plaintiff Mortgage Lenders Network USA, Inc., for its Amended Complaint against Defendants, Adkins Appraisal Services, Inc., Debra Adkins, Jay Riccardi, David G. Anderson, and Emilio Soli, states and alleges as follows:

JURISDICTION AND VENUE

1. The Court has jurisdiction over this action pursuant to 28 U.S.C. §§ 1332 as there is complete diversity between the Plaintiff and the Defendants and the amount in controversy exceeds \$75,000.

2. Venue is proper in this District pursuant to 28 U.S.C. §§ 1391 in that the claims alleged herein arose in this District and many acts and transactions that were part of the unlawful conspiracy and the fraudulent scheme alleged herein occurred in this District. Venue is proper in this District as to certain of the co-conspirator Defendants and, therefore, proper as to all.

PARTIES

3. Plaintiff Mortgage Lenders Network USA, Inc. ("MLN") is a Delaware corporation, with its principal place of business located at 213 Court Street, 11th Floor,

Middletown, Connecticut 06457. MLN is a mortgage lender that, *inter alia*, lends funds to individuals to purchase and/or refinance residential property.

4. Defendant Adkins Appraisal Services, Inc. ("Adkins Appraisal"), upon information and belief, is a corporation that conducts business in Ohio and Michigan, with its principal place of business located at 3014 E. Lincolnshire Blvd., Toledo, Ohio 43606.

5. Defendant Debra Adkins ("Adkins") is an individual who resides and/or is employed at 3014 E. Lincolnshire Blvd., Toledo, Ohio 43606. Adkins is a principal, owner and/or operator Adkins Appraisal.

6. Defendant Jay Riccardi ("Riccardi") is an individual who resides at 6317 Norham Court, Oklahoma City, Oklahoma 73118. At all relevant times, Riccardi was an employee, representative, and/or authorized agent of Adkins Appraisal.

7. Non-party Global Mortgage Co. ("Global Mortgage"), at all relevant times, was an Ohio corporation located at 410 East Sandusky Street, Findlay, Ohio 45840, that conducted business as a mortgage broker. As of September 12, 2003, Global Mortgage recorded its Certificate of Dissolution with the Ohio Secretary of State and, upon information and belief, is no longer a viable corporation conducting business in the State of Ohio.

8. Defendant David G. Anderson ("Anderson") is an individual who resides and/or is employed at 604 Orleans Avenue, Bowling Green, Ohio 43402. Anderson was a principal, owner, and/or operator of Global Mortgage.

9. Defendant Emilio Soli ("Soli") is an individual who resides and/or is employed at 3156 Crown Point Drive, Stow, Ohio 44224-5412. Soli was a principal, owner, and/or operator of Global Mortgage.

