

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF VERMONT

BY *[Signature]*
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2004 SEP 27 PM 4: 20
U.S. DISTRICT COURT
DISTRICT OF VERMONT
FILED

UNITED STATES OF AMERICA)

v.)

LAURA ZIPPRICH)

Criminal No.

1: 06-cr-101-1

INDICTMENT

The grand jury charges:

1. Beginning on or about May 12, 2004, and continuing until in or about December, 2004, in the District of Vermont, the defendant,

LAURA ZIPPRICH,

devised a scheme and artifice to obtain the moneys, funds, assets, and other property under the custody and control of BankNorth, GMAC Mortgage, and Discover Bank by means of false and fraudulent pretenses, representations and promises, specifically by using the identity and identifying information of Paula Matteson without Paula Matteson's knowledge or consent.

2. At all times relevant to this indictment, the deposits of BankNorth, GMAC Mortgage, and Discover Bank were insured by the Federal Deposit Insurance Corporation.

Scheme and Artifice to Defraud

3. On or about May 12, 2004, **Laura Zipprich** applied for an unsecured loan from BankNorth using the name of Paula Matteson, without Paula Matteson's knowledge or consent. She presented a loan application and other documents that purported to bear the signature of Paula Matteson, but those signatures were forged. BankNorth then authorized a loan in the amount of

\$10,000 in Paula Matteson's name, making the check payable to Paula Matteson or Laura Zipprich.

4. Between on or about August 24, 2004, and September 16, 2004, **Laura Zipprich** made plans to apply for and applied for a mortgage from GMAC Mortgage, using the name of Paula Matteson, without Paula Matteson's knowledge or consent. In so doing, she completed loan applications and other documents which purported to bear the signature of Paula Matteson, but were, in fact, forgeries.

5. As she prepared to close on the loan in September, 2004, Laura Zipprich obtained a Power of Attorney from Paula Matteson using false representations.

6. On or about September 16, 2004, **Laura Zipprich** then presented these documents to GMAC Mortgage. GMAC Mortgage then authorized a loan in the amount of \$135,200 in Paula Matteson's name. GMAC Mortgage, through its agent, made disbursements to, among other payees, GMAC mortgage, to pay a preexisting mortgage loan, as well as to Laura Zipprich. As a result of this transaction, Laura Zipprich obtained \$54,724.48 from GMAC Mortgage.

7. On or about December 2, 2004, **Laura Zipprich** applied for a credit card over the internet from Discover Bank. On this internet application form, **Laura Zipprich** used Paula Matteson's name, date of birth, and Social Security Number. **Laura Zipprich** listed herself herself as an "Authorized Buyer" who would have been authorized to make purchases with the credit card. In truth and in fact, as Laura Zipprich well knew, she did not have Paula Matteson's permission, and was not authorized, to use Matteson's name and identifying data.

COUNT ONE

8. The grand jury repeats and realleges paragraphs 1 through 7.
9. On or about May 12, 2004, in the District of Vermont, the defendant

LAURA ZIPPRICH,

knowingly executed and attempted to execute a scheme to defraud BankNorth, a financial institution by applying for a loan in the amount of approximately \$10,000, in the name Paula Matteson.

(18 U.S.C. §1344(1))

COUNT TWO

10. The grand jury repeats and realleges paragraphs 1 through 7.

11. Beginning on or about August 24, 2004, and continuing until on or about September 16, 2004, in the District of Vermont, the defendant,

LAURA ZIPPRICH

knowingly executed and attempted to execute a scheme to defraud GMAC Mortgage, a financial institution, by applying for a loan in the amount of approximately \$135,200, in the name Paula Matteson.

(18 U.S.C. §1344(1))

COUNT THREE

12. The grand jury repeats and realleges paragraphs 1 through 7.

13. Between on or about August 24, 2004, and on or about September 16, 2004, in the District of Vermont, the defendant

LAURA ZIPPRICH,

during and in relation to another felony, specifically, Bank Fraud, knowingly possessed and used, without lawful authority, a means of identification of another person, specifically, the name of Paula Matteson.

(18 U.S.C. § 1028A(a)(1))

COUNT FOUR

14. The grand jury repeats and realleges paragraphs 1 through 7.

15. On or about December 2, 2004, in the District of Vermont and elsewhere, the defendant

LAURA ZIPPRICH,

knowingly executed and attempted to execute a scheme to defraud Discover Bank, a financial institution, by applying for a Discover Card in the name Paula Matteson.

(18 U.S.C. §1344(1))

COUNT FIVE

16. The grand jury repeats and realleges paragraphs 1 through 7.

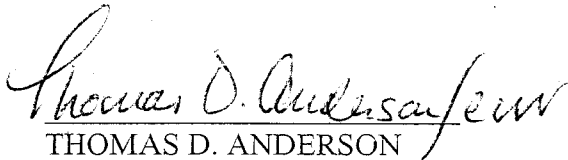
17. On or about December 2, 2004, in the District of Vermont, the defendant

LAURA ZIPPRICH.

during and in relation to another felony, specifically, Bank Fraud, knowingly possessed and used, without lawful authority, a means of identification of another person, specifically, the name of Paula Matteson.

(18 U.S.C. § 1028A(a)(1))

A TRUE BILL


THOMAS D. ANDERSON
United States Attorney

Rutland, Vermont
September 27th, 2006