

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF OREGON

FILED '09 JUN 24 16:20 USDC-ORP

UNITED STATES OF AMERICA

Case No. CR 09- 245-90

v.

INDICTMENT

JOEL D. SURPRENANT,

18 U.S.C. § 1344

Defendant.

THE GRAND JURY CHARGES:

COUNT 1

On or about August 15, 2006, in the District of Oregon, defendant Joel D. Surprenant devised a material scheme and artifice to defraud and to obtain money from First Franklin Financial Corporation, a financial institution, by materially false and fraudulent pretenses and representations.

It was part of the scheme and artifice that:

1. Defendant Joel D. Surprenant, acting as a residential mortgage loan broker, prepared a uniform residential loan application on behalf of himself as the borrower.

2. Defendant Joel D. Surprenant knowingly falsified his financial qualifications on the uniform residential loan application.

3. Defendant Joel D. Surprenant knowingly created false supporting documentation, including pay stubs, to corroborate his false financial qualifications on the uniform residential loan application.

4. Defendant Joel D. Surprenant knowingly inflated the sale price of the residence in order to receive a kickback from the seller outside of the closing of the transaction.

5. Defendant Joel D. Surprenant knowingly identified a co-worker, Adam Durham, as the

mortgage broker, and forged Adam Durham's signature on the uniform residential loan application.

6. Defendant Joel D. Surprenant submitted his false uniform residential loan application to First Franklin Financial Corporation, a financial institution, with the intent that the financial institution would approve the mortgage loan based upon the false financial qualifications provided in his uniform residential loan application.

7. Defendant Joel D. Surprenant closed on the approved loan without advising the financial institution of the false financial qualifications provided in the uniform residential loan application.

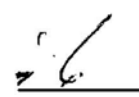
On or about August 31, 2006, in the District of Oregon, defendant Joel D. Surprenant executed the material scheme to defraud First Franklin Financial Corporation and to obtain money owned by them and under their control by material and false pretenses, representation and promises as set forth above, in that defendant Joel D. Surprenant caused First Franklin Financial Corporation to fund a mortgage loan to defendant Joel D. Surprenant in the approximate amount of \$425,000.

All in violation of 18 United States Code, Section 1344.

Dated this 24 day of June, 2009.

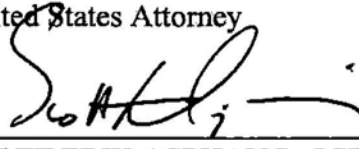
A TRUE BILL

OE



Presented by:

KARIN J. IMMERGUT  
United States Attorney



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