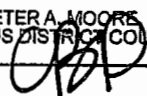


FILED

APR 17 2024

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NORTH CAROLINA  
WESTERN DIVISION

PETER A. MOORE, JR., CLERK  
US DISTRICT COURT, EDNC  
BY  DEP CLK

No. 5:24-CR-133

UNITED STATES OF AMERICA )

v. )

AMANDA JANE PURDY )

CRIMINAL INFORMATION

The United States Attorney charges that:

At all times relevant to this Criminal Information:

Introduction

1. AMANDA JANE PURDY was an individual residing in the Eastern District of North Carolina.

2. The Mortgage Research Center, LLC, dba Veterans United Home Loans (hereinafter "Veterans United"), is a federally related mortgage lending business as defined in section 3 of the Real Estate Settlement Procedures Act of 1974, is incorporated in the State of Missouri and authorized and licensed to conduct business as a mortgage lender in the State of North Carolina.

3. On October 7, 2019, PURDY and her husband, voluntarily filed for Chapter 13 bankruptcy in the Eastern District of North Carolina. As a result, pursuant to the Local Bankruptcy Rules for the Eastern District of North Carolina, PURDY was required to seek permission from the Court prior to entering into debt in excess of \$10,000.00.

4. On December 8, 2021, PURDY filed a Motion to Incur Debt, which sought Court approval to incur debt to purchase residential real property. The Court entered an Order Denying the Motion to Incur Debt on January 12, 2022. On January 13, 2022, PURDY filed a Motion to Reconsider the Order Denying Motion to Incur Debt. A hearing on the Motion to Reconsider was conducted on January 19, 2022. Upon the close of evidence, the Court made findings and conclusion of law denying the Motion to Reconsider. The Court entered an Order denying the Motion to Reconsider on February 23, 2022.

5. Despite the court's denial of PURDY's request to incur debt, on or between January 20, 2022 to January 25, 2022, PURDY engaged in a scheme to cause Veterans United to provide a \$560,000 residential loan to PURDY and her husband for the purchase of a home located in Clayton, North Carolina.

6. To carry out the scheme, on or about January 20, 2022, PURDY drafted a fraudulent letter allegedly signed by the Bankruptcy Trustee ("J.L."). The fraudulent letter not only expressed the Bankruptcy Trustee's support for PURDY to enter into the mortgage loan transaction, but moreover satisfied a requirement imposed by the lender Veterans United for the home loan to be approved.

7. On or about January 21, 2022, PURDY transmitted the fraudulent letter to Veterans United Senior Loan Officer ("B.M."), with the intent to cause Veterans United to issue the home loan.

8. On or about January 25, 2022, Veterans United issued the loan to PURDY and her husband for the purchase of the home located in Clayton, North Carolina.

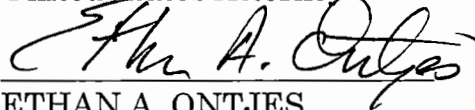
**The Charge**

9. The allegations contained in Paragraphs 1. through 8. above are re-alleged and incorporated herein by this reference.

10. On or about January 21, 2022, in the Eastern District of North Carolina and elsewhere, the defendant, AMANDA JANE PURDY, knowingly made a false statement for the purpose of influencing the action of the Veterans United, an entity that makes federally related mortgage loans, in connection with a loan, in that the defendant supplied to Veterans United a forged letter in the name of bankruptcy trustee J.L. to satisfy a condition of said loan, when in truth, as the defendant well knew, J.L. did not author the letter and did not approve of the loan. All in violation of Title 18, United States Code, Section 1014.

MICHAEL F. EASLEY, JR.

United States Attorney

A handwritten signature in black ink, appearing to read "Ethan A. Ontjes", is written over a horizontal line.

ETHAN A. ONTJES

Assistant United States Attorney  
Criminal Division