

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Criminal No. 22-  
v. :  
LORI ANDREWS : 18 U.S.C. § 2314  
26 U.S.C. § 7201

**INFORMATION**

The defendant having waived in open court prosecution by Indictment, the United States Attorney for District of New Jersey charges:

**Count 1**  
**[18 U.S.C. §2314 – Interstate Transportation of Stolen Property]**

The Defendant and Other Entities or Organizations

1. At all times relevant to this Information:
  - a. Company #1 was a real estate management company headquartered in Jenkintown, Pennsylvania. Company #1 managed numerous multi-family dwellings in the Philadelphia area.
  - b. Defendant LORI ANDREWS was a resident of Voorhees, New Jersey. Defendant ANDREWS was employed by Company #1 in the property management office of an apartment building located on North Broad Street, Philadelphia, Pennsylvania. As part of her duties, defendant ANDREWS had access to the payments made by tenants. These payments included payments for rent, electric bills, parking, and duplicate keys. The payments were in the form of checks or money orders.

c. On or about October 25, 2006, defendant LORI ANDREWS set up a checking account titled “40th and Promenade,” and would later change the name to “1220,” at Bank #1. 40th and Promenade and 1220 were apartment buildings located in Philadelphia, Pennsylvania and operated by Company #1. Defendant ANDREWS used a false social security number to open this bank account.

d. Bank #1, headquartered in Louisville, Kentucky, was a “financial institution” within the meaning of Title 18, United States Code, Section 20, engaged in interstate commerce and insured by the Federal Deposit Insurance Corporation.

2. At various times between in or about January 2011 and October 31, 2018, residents of the apartment buildings 40th and Promenade and 1220 paid various fees in the form of check or money order to the Company #1 rental office in Philadelphia, Pennsylvania.

3. Between in or about January 2011 and October 31, 2018, defendant LORI ANDREWS stole checks and money orders from Company #1 in Philadelphia, Pennsylvania and deposited, and caused to be deposited, approximately 697 embezzled checks and money orders into her nominee bank account at the Bank #1 branch in Voorhees, New Jersey in the following amounts for the following years:

2011	\$273,863.62
2012	\$333,381.89
2013	\$327,586.89
2014	\$448,185.03
2015	\$478,884.25

2016	\$349,327.93
2017	\$273,834.61
2018	<u>\$186,621.40</u>

The deposits totaled approximately \$2,671,685.51.

4. From in or about January 2011 to on or about October 31, 2018, in Camden County, in the District of New Jersey and elsewhere, defendant

LORI ANDREWS,

did knowingly transport, transmit, and transfer and cause to be transported, transmitted and transferred, in interstate commerce from Pennsylvania to New Jersey, goods, wares, and merchandise, of the value of \$5,000 and more, namely stolen checks and money orders, knowing the same to have been stolen and converted.

In violation of Title 18, United States Code, Section 2314, and Title 18, United States Code, Section 2.

**Count 2**  
**[26 U.S.C. § 7201 – Income Tax Evasion]**

1. Paragraphs 1 through 3 of Count 1 of the Information are incorporated as if set forth in full herein.
2. At all times relevant to this Information:
  - a. The Internal Revenue Service (“IRS”) was a constituent agency of the United States Department of Treasury and part of the Executive Branch of the Government responsible for administering and enforcing the tax laws of the United States and collecting taxes owed to the Treasury of the United States, and providing refunds of taxes overpaid.
  - b. Generally, individuals were required by law to prepare and file income tax returns with the IRS by April 15 of the year following the year when the income was earned unless an extension was granted. If those income tax returns show that income taxes were due and owing then the tax payer was obligated by law to pay that sum of money to the IRS.
3. For calendar years 2011 through 2015, defendant LORI ANDREWS filed personal income tax returns, U.S. Individual Income Tax Return, Forms 1040, with the IRS, on behalf of herself and her husband. The only income reported on those returns was Forms W-2 income from defendant ANDREWS’s job at Company 1 and her husband’s Forms W-2 income.
4. For calendar years 2016 through 2018, defendant LORI ANDREWS failed to file personal income tax returns with the IRS.
5. During the years 2011 through 2018, defendant LORI ANDREWS did not report approximately \$2,671,685.51 of income that she earned through

the scheme described in Count 1 on her U.S. Individual Income Tax Return, Form 1040. As a result, defendant ANDREWS has an additional tax due and owing of \$917,735.

6. During the calendar years 2011 through 2018, in the District of New Jersey, and elsewhere, defendant

LORI ANDREWS

did knowingly and willfully attempt to evade and defeat a substantial part of the income tax due and owing by her to the United States for calendar years 2011 through 2018 by only reporting her Form W-2 wages. Defendant ANDREWS failed to report the checks and money orders that she embezzled from Company #1, which she deposited into a nominee bank account and which she used to pay personal expenses, thereby concealing and attempting to conceal from the IRS her true and correct income. As a result of such additional taxable income, there was additional tax due and owing to the United States.

In violation of Title 26, United States Code, Section 7201.



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PHILIP R. SELLINGER  
United States Attorney

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UNITED STATES OF AMERICA

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