

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TENNESSEE  
WESTERN DIVISION

UNITED STATES OF AMERICA,	)	
	)	Cr. No. _____
	)	
Plaintiff,	)	18 U.S.C. § 1343
	)	
vs.	)	
	)	
DEBORAH BROWN,	)	
	)	
Defendant.	)	

INDICTMENT

THE GRAND JURY CHARGES:

COUNT ONE

A. INTRODUCTION

1. On or about February 14, 2004, **DEBORAH BROWN** signed Uniform Residential Loan Application, also known as a "Fannie Mae Form 1003," and a "1003," to purchase 8550 Pleasant Hill, Olive Branch, MS 38654 ("the Pleasant Hill Property").
2. Argent Mortgage Company, LLC ("the Lender") was the lender for the mortgage loan.
3. The Lender approved the mortgage, sending the mortgage loan which allowed **DEBORAH BROWN** to take title to the Pleasant Hill Property.

B. PURPOSE OF THE SCHEME AND ARTIFICE

On or about February 14, 2005, **DEBORAH BROWN** devised and intended to devise a scheme and artifice for obtaining money and property by means of false and fraudulent pretenses, promises and representations. Specifically, she intended to induce

the Lender to extend her a mortgage loan for the purchase of the Pleasant Hill Property.

C. THE SCHEME AND ARTIFICE

The scheme and artifice to defraud, and to obtain money and property was in substance as follows:

1. In support of said loan application, **DEBORAH BROWN** submitted or caused to be submitted to the Lender false and fictitious bank records purporting to show assets and income that were not hers.
2. In support of said loan application, **DEBORAH BROWN** submitted or caused to be submitted to the Lender a loan application which falsely and fraudulently stated and represented her employment and monthly income.

D. THE WIRE COMMUNICATION

On or about February 17, 2005, having devised and intending to devise the aforesaid scheme and artifice to defraud, and obtain property by means of false and fraudulent pretenses, representations and promises, the defendant,

----- **DEBORAH BROWN** -----

did for the purpose of executing the aforesaid scheme and artifice, and in furtherance thereof, knowingly cause to be transmitted in interstate commerce by means of wire communications certain writings and signals. More specifically, **DEBORAH BROWN** caused the Lender to wire transfer approximately \$212,668.60 from a place outside the State of Tennessee to the Accurate Title and Escrow Memphis, Inc. account at Regions Bank in Cordova, TN.

All in violation of Title 18, United States Code, Sections 1343.

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**A TRUE BILL**

**S/GRAND JURY FOREPERSON**

DATED: 11/16/2006

*Lawrence J. Gandy*  
Asst UNITED STATES ATTORNEY