

RECEIVED

JSDC, WESTERN DISTRICT OF LA
ROBERT H. SHEMWEILL, CLERK

DATE 10 31 05

GB

UNITED STATES DISTRICT COURT

WESTERN DISTRICT OF LOUISIANA

LAFAYETTE-OPELOUSAS DIVISION

UNITED STATES OF AMERICA

*

CRIMINAL NO. 05-60061

*

*

18 U.S.C. § 4

*

v.

*

JUDGE HAIK

TONI NICOLE BROWN

*

MAGISTRATE JUDGE METHVIN

FACTUAL BASIS TO SUPPORT GUILTY PLEA

NOW INTO COURT, comes the UNITED STATES OF AMERICA, through the undersigned Assistant United States Attorney, and the defendant, TONI NICOLE BROWN, represented by undersigned counsel, Joseph R. Streva, Jr., and for purposes of providing the Court with a factual basis for plea agreement pursuant to Rule 11(b)(3) of the Federal Rules of Criminal Procedure, stipulate as follows:

Between on or about August 1, 1999, and continuing through on or about November 31, 2001, in the Western District of Louisiana, the defendant, TONI NICOLE BROWN, was employed as a loan processor for Infinity Mortgage Services. Infinity Mortgage Services was a mortgage brokerage company located in Lafayette, Louisiana. The defendant's primary responsibilities included processing loan applications for prospective borrowers and verifying borrower's income credit worthiness.

The defendant, along with her co-workers, were aware of and participated in a scheme to commit Bank Fraud and Mail Fraud created by Infinity Mortgage Services owner, Anthony Grishby. The defendant and her co-workers prepared and forwarded, via

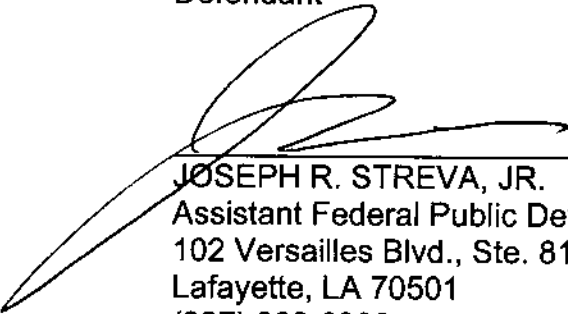
mail and wire, loan applications for residential properties primarily located in Lafayette, Louisiana and surrounding areas. The defendant concealed the fraud by processing and forwarding mortgage documents which contained false employment information, false W-2 forms, false Verification of Mortgages and credit information. The false information disguised the true credit worthiness of borrowers and caused the financial institution to make loans to unqualified borrowers. The defendant, TONI NICOLE BROWN, did not report the fraud to any law enforcement authority.

SIGNED AND AGREED:

10/25/05
Date

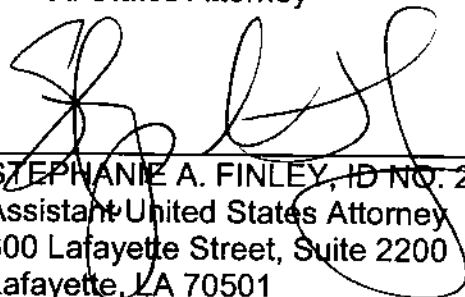

TONI NICOLE BROWN
Defendant

10/25/05
Date


JOSEPH R. STREVA, JR.
Assistant Federal Public Defender
102 Versailles Blvd., Ste. 816
Lafayette, LA 70501
(337) 262-6336

DONALD W. WASHINGTON
United States Attorney

10/31/05
Date


STEPHANIE A. FINLEY, ID NO. 20811
Assistant United States Attorney
800 Lafayette Street, Suite 2200
Lafayette, LA 70501
(337) 262-6618