

6. EQUICREDIT's cash processing department was located at 10401 Deer Wood Park Blvd., Jacksonville, Florida 32256.
7. EQUICREDIT was a corporation organized and existing under the laws of North Carolina.

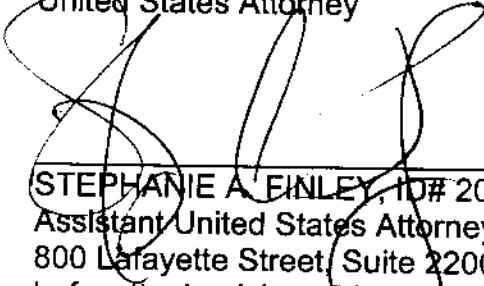
B. THE CHARGE

Between on or about August 1, 1999, through November 31, 2001, the exact dates being unknown, in the Western District of Louisiana and elsewhere, the defendant, TONI NICOLE BROWN, having knowledge of the actual commission of a felony cognizable by a court of the United States, to wit: Mail Fraud and Bank Fraud being committed by Anthony Grishby, and others, doing business as Infinity Mortgage, said fraud constituting a violation of Title 18, United States Code, Sections 1341 and 1344, did conceal the same by processing and forwarding to lenders, and aiding and abetting in the processing and forwarding, mortgage documents containing false employment and credit information which disguised the true credit worthiness of borrowers, and did not make said crime known as soon as possible to some judge or other person in civil or military authority under the United States, all in violation of Title 18, United States Code, Section 4. [18 U.S.C. § 4].

RESPECTFULLY SUBMITTED:

DONALD W. WASHINGTON
United States Attorney

By:


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