

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
CORPUS CHRISTI DIVISION

United States Courts
Southern District of Texas
FILED

MAY 28 2008

Michael W. Milby, Clerk of Court

UNITED STATES OF AMERICA §
§
VS. §
§
EVERETT C. WILLIAMS §
AKA CHUCK WILLIAMS §

CRIMINAL NO. _____

C-08-354

INDICTMENT

THE GRAND JURY CHARGES THAT:

A. INTRODUCTION

At all times relevant to this Indictment:

1. The defendant, EVERETT C. WILLIAMS, was a resident of Corpus Christi, Nueces County, Texas.
2. The defendant, EVERETT C. WILLIAMS, owned, operated, and/or used the name of several businesses which included Minit Mortgage and Dykeswill, LTD.
3. Minit Mortgage was a sole proprietorship owned by EVERETT C. WILLIAMS, which business was engaged in securing financing for the purpose of purchasing real property. Minit Mortgage operated from offices located in Corpus Christi and Pasadena, Texas.
4. Dykeswill, LTD was a general partnership registered with the State of Texas. EVERETT C. WILLIAMS had a 99% share in Dykeswill, LTD.
5. Waiono Meadows Ranch, LTD., unindicted herein, was a California limited partnership which provided financing for the purchase of approximately 400 acres of unimproved land located on the island of Hawaii by Dykeswill, LTD. during March 2003.

B. PURPOSE OF THE SCHEME AND ARTIFICE

6. From on or about April 1, 2003, and continuing until on or about November 31, 2003, in the Corpus Christi Division of the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendant,

EVERETT C. WILLIAMS AKA CHUCK WILLIAMS,

who was aided and abetted by other persons known and unknown to the Grand Jurors, did knowingly devise and intend to devise a scheme and artifice to defraud Samimah Aziz, unindicted herein, by means of false and fraudulent pretenses, representations, and promises, and for the purpose of executing such scheme or artifice to defraud did cause to be deposited matters and things whatever to be sent or delivered by private and commercial interstate carriers, and took and received therefrom, such matters and things, as more fully set forth below.

C. MANNER AND MEANS

7. It was part of the scheme and artifice to defraud that the defendant represented to Samimah Aziz, unindicted herein, that her money would be used to pay off existing debts in order to enhance her credit rating, purchase a residence located at 6222 Lost Creek, Corpus Christi, Texas, and invest in two(2) commercial buildings located at 1800 and 1801 Staples Street, Corpus Christi, Texas.

8. It was further part of the scheme and artifice to defraud that the defendant caused private and commercial interstate carriers to be used by Samimah Aziz, unindicted herein, in order to facilitate the transfer of her money to the defendant.

9. It was further part of the scheme and artifice to defraud that the defendant did not invest the funds solicited and collected from Samimah Aziz, unindicted herein, as represented, but diverted the majority of these funds to another real estate investment located in Hawaii.

D. EXECUTION OF THE SCHEME AND ARTIFICE TO DEFRAUD

10. On or about the dates set forth below, in the Corpus Christi Division of the Southern District of Texas, the defendant,

EVERETT C. WILLIAMS AKA CHUCK WILLIAMS,

for the purpose of executing and carrying out of the aforesaid scheme and artifice to defraud, and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises, did knowingly and willfully cause to be deposited matters and things whatever to be sent or delivered by private and commercial interstate carriers as follows:

COUNTS ONE (1) THROUGH FOUR (4)

COUNT	DATE	MATTER
1	5-29-03	Purchase contract for 6222 Lost Creek, Corpus Christi, Texas, sent by EVERETT C. WILLIAMS via Fedex from Corpus Christi, Texas, to Smyrna, Georgia.
2	6-4-03	Check in the amount of \$130,000 sent by Fedex from Smyrna, Georgia to Corpus Christi, Texas for the purchase of the residence located at 6222 Lost Creek, Corpus Christi, Texas.

COUNT	DATE	MATTER
3	6-20-03	Edward Jones Check #106519283 in the amount of \$200,000 sent to DYKESWILL LTD. C/O CHUCK WILLIAMS.
4	6-27-03	Estimates for cost of repairs for properties located at 1800 and 1801 Staples Street, Corpus Christi, Texas sent from EVERETT C. WILLIAMS to Samimah Aziz, unindicted herein.

In violation of Title 18, United States Code, Sections 1341 and 2.

COUNT FIVE (5)

11. Paragraphs 1 through 5 are re-alleged and incorporated by reference herein.

PURPOSE OF THE SCHEME AND ARTIFICE

12. From on or about April 1, 2003, and continuing until on or about November 31, 2003, in the Corpus Christi Division of the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendant,

EVERETT C. WILLIAMS AKA CHUCK WILLIAMS,

who was aided and abetted by other persons known and unknown to the Grand Jurors, did knowingly devise and intend to devise a scheme and artifice to defraud Samimah Aziz, unindicted herein, by means of false and fraudulent pretenses, representations, and promises, and for the purpose of executing such scheme or artifice to defraud did transmit and cause to be

transmitted by means of wire communication in interstate or foreign commerce, any writings, signs, signals, pictures, or sounds for the purpose of executing such scheme and artifice to defraud.

MANNER AND MEANS

13. It was part of the scheme and artifice to defraud that the defendant represented to Samimah Aziz, unindicted herein, that her money would be used to pay off existing debts in order to enhance her credit rating, purchase a residence located at 6222 Lost Creek, Corpus Christi, Texas, and invest in two(2) commercial buildings located at 1800 and 1801 Staples Street, Corpus Christi, Texas.

14. It was further part of the scheme and artifice to defraud that the defendant caused private and commercial interstate carriers to be used by Samimah Aziz, unindicted herein, in order to facilitate the transfer of her money to the defendant.

15. It was further part of the scheme and artifice to defraud that the defendant caused Samimah Aziz, unindicted herein, to transfer money to him through wire communications in interstate and foreign commerce in order to further his scheme and artifice to defraud.

16. It was further part of the scheme and artifice to defraud that the defendant did not invest the funds solicited and collected from Samimah Aziz, unindicted herein, as represented, but diverted the majority of these funds to another real estate investment located in Hawaii and to his personal living expenses.

EXECUTION OF THE SCHEME AND ARTIFICE TO DEFRAUD

17. On or about July 3, 2003, in the Corpus Christi Division of the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendant,

EVERETT C. WILLIAMS AKA CHUCK WILLIAMS,

for the purpose of executing and carrying out of the aforesaid scheme and artifice to defraud, and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises, did knowingly and willfully cause Samimah Aziz, unindicted herein, to transmit \$70,000 by electronic funds transfer from Smyrna, Georgia, to Corpus Christi, Texas.

In violation of Title 18, United States Code, Sections 1343 and 2.

COUNTS SIX (6) THROUGH FIFTEEN (15)

18. Paragraphs 1 through 5 are re-alleged and incorporated by reference herein.

19. Between on or about April 1, 2003, and on or about November 31, 2003, in the Corpus Christi Division of the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendant,

EVERETT C. WILLIAMS AKA CHUCK WILLIAMS,

did knowingly and willfully conduct and attempt to conduct the following financial transactions, which transactions involved the proceeds of specified unlawful activities, that is mail and wire fraud, with the intent to promote the carrying on of specified unlawful activities, and to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of specified unlawful activities, and that, while conducting and attempting to conduct such financial transactions, the defendant knew that the property involved in each financial transaction represented the proceeds of some form of unlawful activity:

COUNT	DATE	TRANSACTION
6	6-5-03	Converted Bank of America Check # 1034 in the amount of \$130,000 to Bank of America Cashier's Check # 0737445 in the amount of \$129,985.
7	6-5-03	Deposited Bank of America Cashier's Check # 0737445 in the amount of \$129,985 into First National Bank Account # xxxxx2725, which account was in the name Minit Mortgage.
8	6-5-03	Transferred \$50,000 from First National Bank Account # xxxxx2725 (Minit Mortgage) to First National Bank Account # xxxxx3652, which account was in the name Claudia Williams, unindicted herein.
9	6-10-03	\$45,000 from First National Bank Account # xxxxx3652 (Claudia Williams, unindicted herein) deposited into First National Bank Account # xxxxx1602, which account was in the name Dykeswill, LTD.
10	6-10-03	Transferred \$80,000 from First National Bank Account # xxxxx2725 (Minit Mortgage) into First National Bank Account # xxxxx1602 (Dykeswill, LTD.)

COUNT	DATE	TRANSACTION
11	6-11-03	Withdrew \$100,000 in funds from First National Bank Account # xxxxx1602 (Dykeswill, LTD.) to purchase First National Bank Cashier's Check # 4671569067 made payable to Waiono Meadows Ranch LTD., unindicted herein.
12	6-24-03	Deposited Edward Jones Check # 106519283 in the amount of \$200,000 from Samimah Aziz, unindicted herein, into First National Bank Account # xxxxx1602 (Dykeswill, LTD.)
13	6-25-03	Withdrew \$165,279.03 from First National Bank Account # xxxxx1602 (Dykeswill, LTD.) to purchase First National Bank Cashier's Check # 467157010 made payable to Waiono Meadows Ranch LTD., unindicted herein.
14	7-3-03	Deposited \$70,000 in wire transferred funds from Samimah Aziz, unindicted herein, to First National Bank Account # xxxxx1602 (Dykeswill, LTD.)
15	7-10-03	Withdrew \$28,807.65 from First National Bank Account # xxxxx1602 (Dykeswill, LTD.) to purchase First National Bank Cashier's Check # 4671569141 made payable to Waiono Meadows ranch, LTD., unindicted herein.

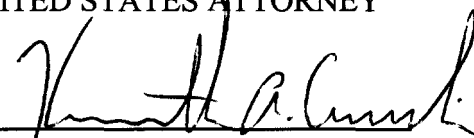
In violation of Title 18, United States Code, Sections 1956(a)(1)(A)(i), 1956(a)(1)(B)(i), and 2.

A TRUE BILL:


FOREPERSON OF THE GRAND JURY

DONALD J. DeGABRIELLE, JR.
UNITED STATES ATTORNEY

By: _____



KENNETH A. CUSICK
Assistant United States Attorney