

STATE OF MICHIGAN 61st JUDICIAL DISTRICT 17TH JUDICIAL CIRCUIT	COMPLAINT FELONY	DISTRICT: CIRCUIT: CTN: 96-12901909-01 COMPLAINT #: 2012-0007975-A
District Court ORI: MI410035J	Circuit Court ORI: MI410025J	AG ORI: MI820025A

THE PEOPLE OF THE STATE OF MICHIGAN v		Victim or complainant: Kent County Register of Deeds
LORRAINE O'REILLY BROWN 1205 LANDINGS CV ALPHARETTA, GA 30009		Complaining Witness SA MARTIN MAY
Co-defendant(s)		Date: On or about March 2009 - October 2009
City/Twp./Village Kent County	County in Michigan Kent	Defendant SID
Charge(s) See Below		Defendant DOB 07/09/1961
		Maximum Penalty See Below

STATE OF MICHIGAN, COUNTY OF KENT

The complaining witness says that on the date and at 300 Monroe Avenue NW, the defendant, contrary to law,

DocX, a document processing company located in Alpharetta, Georgia, processed mortgage assignments and lien releases for residential lenders and servicers nationwide. Lorraine Brown was DocX's President. DocX ceased operations in February 2010.

Lorraine Brown established and orchestrated a widespread scheme of "robosigning," a practice in which unauthorized employees were directed to fraudulently sign another authorized person's name on mortgage documents in order to execute these documents as quickly as possible and increase profits. One of DocX's authorized signors was Linda Green. Unauthorized signors at DocX repeatedly signed Linda Green's name, as well as other authorized signor's names, to mortgage related documents. Internally DocX identified this practice as "facsimile signing" or "surrogate signing." From 2006 through 2009, these improperly executed documents were created and recorded at Brown's direction. More than 1,000 unauthorized and improperly executed documents were filed with county registers of deeds throughout Michigan.

COUNT 1: CRIMINAL ENTERPRISES - CONDUCTING

being a person employed by or associated with an enterprise, to wit: DocX, did knowingly conduct or participate in the affairs of the enterprise directly or indirectly through a pattern of racketeering activity, consisting of two or more of the following incidents of racketeering, to wit:

on or about March 2009 - October 2009, in Alpharetta, Georgia, defendant did commit the following offense for financial gain, to wit: FORGERY - did falsely make, alter, forge or counterfeit a promissory note or an order, acquittance or discharge for money or other property, with intent to injure or defraud, to-wit:

Type of Instrument: Lien Releases and Assignments

Date on Instrument: March 2009 - October 2009

Received by: Kent County Register of Deeds

Drawer or Maker: DocX

; contrary to MCL 750.248 [750.248]

and on or about March 2009 - October 2009, in Kent County, Michigan and Alpharetta, Georgia, defendant did commit the following offense for financial gain, to wit: UTTERING AND PUBLISHING - did utter and publish as true, a certain false, forged, altered or counterfeit records, instrument or other writing, with intent to injure or defraud, knowing said instrument to be false, altered, forged or counterfeit, said instrument more fully described as follows:

Type of Instrument: Lien Releases and Assignments
Date of Instrument: March 2009 - October 2009
Uttered and Published to: Kent County Register of Deeds
Drawer or Maker: DocX


; contrary to MCL 750.249 [750.249]

having the same or a substantially similar purpose, or result, or participant, or method of commission, and which amount to or pose a threat of continued criminal activity; contrary to MCL 750.159i(1). [750.159i1] FELONY: 20 Years and/or \$100,000.00; criminal forfeiture of proceeds, substituted proceeds, and instrumentalities of racketeering listed on attached notification (see MCL 750.159j(4)); court may order court costs, costs of investigation, and/or costs of prosecution

Upon conviction of a felony or an attempted felony court shall order law enforcement to collect DNA identification profiling samples.

The complaining witness asks that defendant be apprehended and dealt with according to law.

Warrant authorized on 11/26/12 by: _____
Date



Scott L. Teter (P40777)
Assistant Attorney General
Corporate Oversight Division
P.O. Box 30755
Lansing, MI 48909
517-373-1160

Security for costs posted

Complaining witness signature

Subscribed and sworn to before me on _____
Date

Judge/Magistrate/Clerk Bar no.