

RECEIVED

JUL 27 2005

ROBERT H. SHEM WELL, CLERK
WESTERN DISTRICT OF LOUISIANA
SHREVEPORT, LOUISIANA

UNITED STATES DISTRICT COURT

WESTERN DISTRICT OF LOUISIANA

LAFAYETTE-OPELOUSAS DIVISION

UNITED STATES OF AMERICA

CRIMINAL NO. 05-60043-01-07

*
*
*
*
*
*
*

18 U.S.C. § 2
18 U.S.C. § 371
18 U.S.C. § 1341
18 U.S.C. § 1344

VERSUS

*
*

ANTHONY T. GRISHBY 01
HOWARD McZEAL 02
ERIN BROUSSARD 03
RENAY MATTHEWS 04
TAMESHIA MATTHEWS 05
SHAWN HOLLIER 06
LORI MOREAU 07

*
*
*
*
*
*
*

JUDGE HARK
MAGISTRATE JUDGE METHVIN

INDICTMENT

THE GRAND JURY CHARGES:

COUNT 1

CONSPIRACY
18 U.S.C. § 371

A. INTRODUCTION

At all times material to this Indictment:

1. Defendant, ANTHONY T. GRISHBY, resided in Lafayette, Louisiana. He was the president and a managing partner of Infinity Mortgage Services, Incorporated (hereinafter referred to as "INFINITY") located at 110 East Kaliste Saloom Road, Suite 101A, Lafayette, LA and 104 Fourpark Road, Lafayette, LA.
2. INFINITY was a corporation whose primary business was a broker of mortgage loans for residential properties.
3. GSA Financial Services, Inc. (hereinafter referred to as "GSA") was an entity created and owned in part by defendant, ANTHONY T. GRISHBY, used in part to facilitate his illegal loan brokerage activity.

4. First Premier Financial Services (hereinafter referred to as "First Premier") was an entity created and owned in part by defendant, ANTHONY T. GRISHBY, used in part to facilitate his illegal loan brokerage activity.
5. First Chance Home Lending (hereinafter referred to as "First Chance") was an entity created and owned in part by defendant, ANTHONY T. GRISHBY, used in part to facilitate his illegal loan brokerage activity.
6. Eminem Enterprise, was an entity created by a co-conspirator with the knowledge of defendant, ANTHONY T. GRISHBY, used in part to facilitate the illegal loan brokerage activity conducted by INFINITY.
7. B. Castille bank account was opened and used in part by an unindicted co-conspirator to funnel money obtained from the INFINITY mortgage fraud scheme.
8. Defendant, HOWARD McZEAL, was a resident of Lafayette, Louisiana. He was a real estate appraiser who was hired at the direction of the defendant, ANTHONY T. GRISHBY, to determine market values of properties that were the subject of loans marketed by INFINITY. Defendant, HOWARD McZEAL, operated McZeal's Appraisal Services located at 209 Becky Lane, Lafayette, LA.
9. Defendant, RENAY MATTHEWS, was a resident of Lafayette, Louisiana. She was employed at INFINITY as a loan processor from on or about January 1, 2000, until on or about September 30, 2000, the exact dates being unknown. As a loan processor, RENAY MATTHEWS primarily processed loan applications for prospective borrowers (hereinafter referred to as "Borrowers") and verified Borrowers' income and credit worthiness.
10. Defendant, TAMESHIA MATTHEWS, was a resident of Lafayette, Louisiana. She was employed at INFINITY as a loan processor from on or about December 1, 1999, until on or about October 31, 2000, the exact dates being unknown. As a loan processor, TAMESHIA MATTHEWS primarily processed loan applications for prospective Borrowers and verified Borrowers' income and credit worthiness.
11. Defendant, SHAWN HOLLIER, was a resident of Leonville, Louisiana. She was employed at INFINITY as a loan processor from on or about April 1, 1999, through November 30, 2000, the exact dates being unknown. As a loan processor, SHAWN HOLLIER primarily processed loan applications for prospective Borrowers and verified Borrowers' income and credit worthiness.
12. Defendant, LORI MOREAU, was a resident of Scott, Louisiana. She was employed at INFINITY as a loan processor from on or about April 1, 1999, through November 30, 2000, the exact dates being unknown. As a loan processor, LORI MOREAU primarily processed loan applications for prospective Borrowers and verified Borrowers' income and credit worthiness.

13. Defendant, ERIN BROUSSARD, was a resident of Lafayette, Louisiana. She was employed as a secretary at INFINITY from April 1999 to November 30, 2001, the exact dates being unknown. She performed secretarial duties, and also created false documents to include false social security award letters, W-2 forms, check stubs and mortgage histories at the request of defendant, ANTHONY T. GRISHBY, and other loan originators.
14. BANK OF AMERICA was a financial institution, the deposits of which were insured by the Federal Deposit Insurance Corporation (FDIC).
15. Equicredit Corporation of America (hereinafter referred to as "EQUICREDIT"), was a wholly owned subsidiary of Bank of America with a branch office located at 3850 North Causeway Blvd., Suite 1720, Metairie, Louisiana.
16. EQUICREDIT's cash processing department was located at 10401 Deer Wood Park Blvd., Jacksonville, Florida 32256.
17. EQUICREDIT was a corporation organized and existing under the laws of North Carolina.

B. THE CONSPIRACY

From on or about April 1, 1999, until on or about November 30, 2001, in the Western District of Louisiana and elsewhere, the defendants, ANTHONY T. GRISHBY, along with SHAWN HOLLIER, ERIN BROUSSARD, LORI MOREAU, RENAY MATTHEWS, TAMESHIA MATTHEWS, HOWARD McZEAL, together with unindicted co-conspirators and others, did knowingly and intentionally combine, confederate, conspire and agree together with diverse others, both known and unknown to the Grand Jury, to commit certain offenses against the United States, to wit:

1. To knowingly devise and execute and attempt to devise to execute a scheme and artifice to defraud and obtain money and property from federally insured financial institutions, including but not limited to, Bank of America, via Equicredit, by knowingly submitting and causing to be submitted materially false qualifying information and documentation along with other false representations, all in violation of Title 18, United States Code, Sections 1343 and 2. [18 U.S.C. §§ 1343 and 2], and

2. To knowingly devise and execute and attempt to devise and execute a scheme and artifice to defraud and obtain money by false and fraudulent pretenses, representations and promises as described in paragraph C(1), and for the purpose of executing said scheme and artifice to defraud and attempting to execute said scheme, placed and caused to be placed in a post office and authorized depositories for mail matters, letters, packages and property to be sent and delivered by the United States Postal Service and by private and commercial interstate carrier, in violation of Title 18, United States Code, Sections 1341 and 2.

C. MANNER AND MEANS OF THE CONSPIRACY

In order to accomplish the objects of the conspiracy, the defendant, ANTHONY T. GRISHBY, aided and abetted by his co-conspirators and/or unindicted co-conspirators, used the following manner and means, among others:

The use of the term "conspirators" herein refers to the defendant, ANTHONY T. GRISHBY, and one or more indicted conspirators and/or unindicted conspirators, or to some other person whom one or more co-conspirators, either indicted or unindicted, caused to act:

1. The conspirators fraudulently prepared and forwarded via mail and wire, loan applications for residential properties primarily in Lafayette and the surrounding areas to include, but not limited to, Carencro, Opelousas, Ville Platte, Lake Charles, Mamou, Jeanerette, Erath, Scott, Eunice, New Iberia, Loureauxville, St. Martinville, and Rayne, which included false financial figures, false attachments, false social security award letters, false W-2 forms, false work histories, false Verification of Mortgages, and other false documents in an attempt to get a loan processed for an otherwise unapprovable Borrower who was not financially qualified.
2. The conspirators falsely represented on Housing and Urban Development Forms (HUD-1 Settlement Statement Forms) that applications for loans were refinances when, in fact, they were first time purchases.
3. The conspirators prepared and submitted false Verifications of Mortgages.
4. The conspirators submitted appraisals reflecting artificially inflated property values by omitting the true selling price and falsely listing the Borrower as the current owner when, in fact, the Borrower never lived in the home.
5. The conspirators created false W-2 forms by using the Borrowers W-2 form as a guide to input false and inflated figures.

6. The conspirators were paid out of the loan proceeds disguised as payments to fictitious creditor entities, GSA, First Premier and First Chance, among others.
7. The defendant, ANTHONY T. GRISHBY, set up a fax machine to send Verifications of Mortgages to the INFINITY office. He would fax or cause faxes to be sent from the machine in an attempt to make the verifications look authentic.
8. The conspirators assessed Borrowers with excessive charges for credit reports and appraised reports. The excessive charges were paid from the Borrower's funds at the closing of the loan.

D. OVERT ACTS

In furtherance of the conspiracy, and to effect the objects purpose thereof, one of the co-conspirators committed or caused to be committed in the Western District of Louisiana and elsewhere, at least one overt act, to include, but not limited to, the following:

1. At various times between April 1, 1999, and November 30, 2001, the exacts dates being unknown, in the Western District of Louisiana, and elsewhere, the defendants, ANTHONY T. GRISHBY, SHAWN HOLLIER, ERIN BROUSSARD, LORI MOREAU, RENAY MATTHEWS, and TAMESHIA MATTHEWS, along with unindicted co-conspirators and others, did overcharge the below listed Borrowers for the following third party services:

Borrower	Service	Actual Charge	Allowed Charge	Overcharge
Ivory Rubin	Credit Report	\$20.00	\$5.00	\$15.00
Dorothy Verret & Earl Joseph	Credit Report	\$25.00	\$5.00	\$20.00
Manuel Gonzales	Credit Report	\$12.50	\$8.00	\$4.50
Manuel Gonzales	Appraisal Report	\$450.00	\$400.00	\$50.00
Leannie Mae Lewis	Appraisal Report	\$500.00	\$435.00	\$65.00
Theresa Angelle	Appraisal Report	\$650.00	\$450.00	\$200.00
Floyd Fontenete	Appraisal Report	\$550.00	\$425.00	\$125.00

Randy Harrington	Appraisal Report	\$450.00	\$400.00	\$50.00
Shawnette Randall	Appraisal Report	\$500.00	\$450.00	\$50.00
Chris Savoy	Appraisal Report	\$400.00	\$350.00	\$50.00

3. At various times, from on about April 1, 1999, through on or about November 30, 2001, the exact dates being unknown, in the Western District of Louisiana, the defendant, HOWARD McZEAL, doctored photographs used in appraisals to hide inferior qualities, reported first time purchases as being current owners of a property to facilitate a fraudulent refinance, and inflated appraisals of homes. HOWARD McZEAL manipulated the comparable sales process by carefully choosing home sales in different geographical regions to arrive at needed amounts.

4. At various times, between on or about April 1, 1999, through on or about November 30, 2001, the exact dates being unknown, in the Western District of Louisiana, and elsewhere, the defendants, ANTHONY T. GRISHBY, SHAWN HOLLIER, ERIN BROUSSARD, LORI MOREAU, RENAY MATTHEWS and TAMESHIA MATTHEWS, along with unindicted co-conspirators, prepared or caused to be prepared the below listed, among others, false social security award letters to be included as proof of income in mortgage applications submitted to lenders:

Connie Amos	\$1,395.50	\$524.00
Laureen Banks	\$1,022.00 \$1,588.00	\$198.00 \$1,188.00
Leroy Celestine	\$1,124.00	None
Gerrell Charles	\$910.00	\$512.00

Rose Chassion	\$1,162.00	\$532.00
Nathan Dorion, Jr.	\$775.50	None
Elsie Frank	\$900.00 \$500.00	\$500.00 \$500.00
Lee Anna Frank	\$1,995.00	None
Delores Freeman	\$810.00	\$442.00 \$90.00
Barbara Jack	\$555.00 \$477.40 \$477.40	\$355.00 \$177.00 \$177.00
Rena Lewis	\$1,198.00	None
Michael Rideaux	\$985.00	\$654.00
Velma Tezeno	\$1,124.00	\$102.00
John Vigers	\$648.00	\$512.00
Sarah Williams	\$1,295.00 \$29.00 \$29.00 \$29.00	\$29.00 \$29.00 \$29.00 \$29.00
Louise Wilson	\$1,032.00	\$1,130.50
Clarence Wiltz	\$1,496.00	None
Joseph Wiltz, Sr.	\$1,560.50	\$529.00

7. Counts 2 through 65 of this Indictment are realleged and incorporated herein by reference as additional Overt Acts in furtherance of the conspiracy.

All in violation of Title 18, United States Code, Section 371 and 1344. [18 U.S.C. §§ 371 and 1344].

COUNTS 2 - 52

BANK FRAUD
18 U.S.C. § 1344

1. The Grand Jury hereby alleges and incorporates herein by reference Sections A and B, paragraphs D1-D8 and paragraphs E1-E8, of Count 1 as if fully set forth herein as the scheme and artifice to defraud.

2. Between on or about September 1, 1999, and November 30, 2001, the exact dates being unknown, in the Western District of Louisiana and elsewhere, the defendant, ANTHONY T. GRISHBY, aided and abetted by SHAWN HOLLIER, ERIN BROUSSARD, LORI MOREAU, RENAY MATTHEWS, TAMESHIA MATTHEWS, and HOWARD McZEAL, along with unindicted individuals and others, did knowingly and willfully execute and attempt to execute the scheme and artifice to defraud an insured financial institution and to obtain money and property by means of materially false and fraudulent pretenses, representations and promises as describe above.

3. On or about the below listed dates, in the Western District of Louisiana, and elsewhere, the defendant, ANTHONY T. GRISHBY, aided and abetted by SHAWN HOLLIER, ERIN BROUSSARD, LORI MOREAU, RENAY MATTHEWS, TAMESHIA MATTHEWS and HOWARD McZEAL, along with unindicted individuals and others, did knowingly execute and attempt to execute the scheme and artifice as describe above to defraud Equicredit, a wholly owned subsidiary of Bank America, a financial institution, the deposits of which were then insured by the FDIC, by means of materially false and fraudulent pretenses, representations and promises, in that the defendant, ANTHONY T. GRISHBY, aided and abetted by SHAWN HOLLIER, ERIN BROUSSARD, LORI MOREAU, RENAY MATTHEWS, TAMESHIA MATTHEWS and HOWARD McZEAL, along with unindicted individuals and others, caused the

below listed mortgage loans to be made by submitting to Bank of America, via Equicredit, materially false qualifying information and documentation, including false borrower employment, income, assets, liabilities, social security awards (SSA), creditor information and inflated appraisals as follows:

LOAN NUMBER	DATE	BORROWER	EMPLOYMENT OR SOURCE OF INCOME	PROPERTY ADDRESS	LOAN AMOUNT
2	06/10/00	Connie Amos	SSA	4581 Hwy 358 Opelousas, LA	\$57,800.00
3	06/14/99	Velma Tezeno	SSA	501 NE Railroad, Ville Platte, LA	\$34,000.00
4	06/14/99	Paul J. Prejean	First Premier	124 Raceway, Carencro, LA	\$59,925.00
5	06/16/99	Joseph Wiltz, Sr.	SSA	W. Bernard Drive, Arnaudville, LA	\$52,917.41
6	07/26/99	Laureen Banks	SSA	117 Beta Drive, Lafayette, LA	\$70,000.00
7	07/27/99	Clarence and Mildred Wiltz	SSA	15830 Highway 697, Abbeville, LA	\$25,000.00
8	08/19/99	Lee Anna Frank	SSA	1117 Edith Street, Opelousas, LA	\$35,044.71
9	09/20/99	Paulette St. Julien	GSA	900 Madeline Ave., Lafayette, LA	\$46,798.17
10	09/29/99	Fannel and Evelyn Rubin	GSA	1220 Poppy Dr., Opelousas, LA	\$46,750.00
11	10/14/99	Nathan and Madeline Dorion, Jr.	SSA	109 Macon Road, Lafayette, LA	\$51,200.00
12	11/01/99	Orelia and Carlton Jack	GSA	1221 Peach St., Ville Platte, LA	\$19,475.00
13	12/04/99	Charles and Laura Mae Anderson	GSA	609 N. Fontenot St., Ville Platte, LA	\$31,450.00

14	12/13/99	Patrick and Patricia Dixon	J.D. Estilette	504 S. Orange, Lafayette, LA	\$65,800.00
15	12/24/99	Leroy Celestine	SSA	398 Sunset Drive, Lafayette, LA	\$46,750.00
16	12/26/99	Connie Amos	GSA	4581 Hwy. 358, Opelousas, LA	\$55,200.00
17	02/29/00	Delores Freeman	GSA	1407 W. Peach St., Ville Platte, LA	\$32,000.00
18	03/14/00	Rose Chassion	SSA	111 Rainbow Street, Carencro, LA	\$54,800.00
19	03/15/00	Sarah Williams	GSA	8624 Pine Port Road, Ville Platte, LA	\$44,200.00
20	03/18/00	Carl Sam	GSA	260 Gerald St., Opelousas, LA	\$58,500.00
21	04/01/00	John and Sheila Vigers	GSA	419 Liberty St., Eunice, LA	\$36,400.00
22	04/03/00	Kenneth and Shenelle Ford	GSA	1207 Edith St., Opelousas, LA	\$50,400.00
23	04/07/00	Shirley Bias, Jr.	GSA	1600 Legion St., Lake Charles, LA	\$78,300.00
24	04/07/00	Kinth and Gelana Wilson	GSA	209 Chestnut St., Mamou, LA	\$31,450.00
25	04/12/00	Ernest and Genovea Billiot	GSA	206 N. Pellerin, Jeanerette, LA	\$46,600.00
26	04/12/00	Ronnie Matthews	GSA	303 N. Westpoint Cir., Lafayette, LA	\$110,500.00
27	04/14/00	Jane Robertson	GSA	403 Court Street, Ville Platte, LA	\$31,500.00
28	04/18/00	Michelle Billiot	GSA	12716 Neds Lane, Erath, LA	\$68,500.00

COUNT	DATE	NAME	PROPERTY TYPE	ADDRESS	PRICE
29	04/18/00	Barbara Jack	First Premier GSA SSA	N. Dossman, Ville Platte, LA	\$44,500.00
30	04/19/00	Wayne and Lydia Robinson	GSA	1706 10 th St., Lake Charles, LA	\$67,500.00
31	04/25/00	Jeremiah and Terri Thompson	First Premier GSA	540 S. Pellerin, Jeanerette, LA	\$49,500.00
32	05/05/00	Rose Williams	GSA	809 Seventh Street, Mamou, LA	\$42,400.00
33	05/05/00	Quinton and Christine Lavine	GSA	124 Henry Drive, Opelousas, LA	\$61,200.00
34	05/12/00	Clayton and Elrena Harris	GSA	411 N. Reed St., Ville Platte, LA	\$44,800.00
35	05/21/00	Clayton Harris and Elrena Thomas	GSA	411 N. Reed Street, Ville Platte, LA	\$44,800.00
36	05/31/00	Lindy Thevenet	GSA	120 Whitmore Rd., Scott, LA	\$81,000.00
37	06/23/00	Doris Frank	First Premier	540 S. Martin, Eunice, LA	\$34,675.00
38	06/28/00	Shanon L. Boykins and Gerald Pitre	First Family	233 Brockton Drive, Carencro, LA	\$57,600.00
39	06/30/00	Dianne Landry	First Premier	302 Sonny Street, Lafayette, LA	\$47,700.00
40	07/21/00	Deidra Crofton	First Premier	639 Robertson St., New Iberia, LA	\$27,684.00
41	07/25/00	Dorothy Miller	First Premier	1211 Sidney Blanchar, Loureauxville, LA	\$33,005.00
42	08/22/00	Yolanda A. Thomas	First Premier	4846 River Ridge, Lake Charles, LA	\$170,000.00

Case No.	Date	Name	Category	Address	Amount
43	08/23/00	Doris and Wilson Frank	First Premier	540 S. MLK Dr., Eunice, LA	\$34,675.00
44	08/28/00	Corlis Bernard	First Chance	1103 Alexandria Circle St. Martinville, LA	\$187,000.00
45	08/28/00	Manuel and Lori Amos Guidry	First Premier	710 Kahn Avenue, Rayne, LA	\$30,001.00
46	08/30/00	Linda B. Seraile	First Chance	502 Coriel, Ville Platte, LA	\$34,300.00
47	08/30/00	Erica Williams	First Premier	314 E. Beech St., Ville Platte, LA	\$54,918.00
48	09/06/00	Jolisa Battin	First Premier	403 W. Carrier, Washington, LA	\$31,570.00
49	09/06/00	Shawnette Randell	First Premier First Chance	502 English Dr., Lafayette, LA	\$56,200.00
50	10/04/00	Carl Sparrow	First Chance	2305 3 rd St., Jeanerette, LA	\$41,650.00
51	11/17/00	Dorothy Verett	First Chance	315 Berthier St., Abbeville, LA	\$29,250.00
52	11/25/00	Gerrell Charles	GSA	108 Antoine St., Ville Platte, LA	\$19,356.98

All in violation of Title 18, United States Code, Sections 1344 and 2. [18 U.S.C. §§ 1344 and 2].

COUNTS 53 - 65

MAIL FRAUD
18 U.S.C. § 1341

1. The Grand Jury alleges and incorporates herein by reference Sections A and B, paragraphs D1-D8 and paragraphs E1-E8, of Count 1, as though fully set forth herein as the scheme and artifice to defraud.

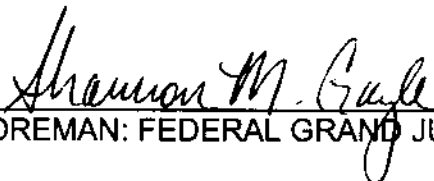
2. The defendant, ANTHONY T. GRISHBY, aided and abetted by SHAWN HOLLIER, ERIN BROUSSARD, LORI MOREAU, RENAY MATTHEWS, and TAMESHIA MATTHEWS, along with unindicted co-conspirators and others, did knowingly and wilfully devise and intend to devise the scheme and artifice to defraud a financial institution and to obtain money and property by means of materially false and fraudulent pretenses, misrepresentations and promises as described above.

3. On or about the below listed dates, the exact dates being unknown, in the Western District of Louisiana and elsewhere, the defendants, ANTHONY T. GRISHBY, aided and abetted by, ERIN BROUSSARD, LORI MOREAU, RENAY MATTHEWS and TAMESHIA MATTHEWS, together with unindicted co-conspirators and others, for the purpose of executing and attempting to execute the aforesaid scheme and artifice to defraud as stated above, did mail or cause to be mailed, after the closing, on or about the below listed dates in interstate commerce by means of U.S. Mail or common carriers, Airborne Express, loan packages which included, but not limited to, false and fraudulent loan applications, qualifying documents, title information, HUD-1s and funding authorizations to be sent to and from INFINITY, 110 East Kaliste Saloom Road, Suite 101A, Lafayette, LA and 104 Fourpark Road, Lafayette, LA to EQUICREDIT, 10401 Deer Wood Park Blvd., Jacksonville, Florida 32256, for the below listed properties:

53	07/28/00	Joseph and Lorretta Charles	728 Halphen Opelousas, LA
54	08/18/00	Doris and Wilson Frank	540 S. MLK Drive Eunice, LA
55	08/22/00	Corlis Bernard	1103 Alexandria Circle St. Martinville, LA
56	08/22/00	Manuel J. Guidry, Jr. and Lori Amos Guidry	710 Kahn Avenue Rayne, LA
57	08/22/00	Yolanda A. Thomas	4846 River Ridge Lake Charles, LA
58	08/26/00	Manuel J. and Lori Amos Guidry	710 Kahn Avenue, Rayne, LA
59	08/30/00	Linda B. Seraile	502 Coriel Ville Platte, LA
60	08/30/00	Erica Williams	314 E. Beech St. Ville Platte, LA
61	08/31/00	Jolisa Battin	403 W. Carrier, Washington, LA
62	09/06/00	Shawnette Randell	502 English Dr. Lafayette, LA
63	10/04/00	Carl Sparrow	2305 3 rd St., Jeanerette, LA
64	11/17/00	Dorothy Verett	315 Berthier St., Abbeville, LA
65	11/25/00	Gerrell Charles	108 Antoine Street Ville Platte, LA

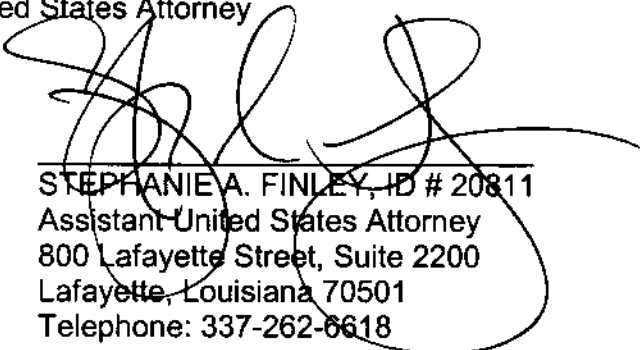
All in violation of Title 18, United States Code, Sections 1343 and 2. [18 U.S.C. §§ 1343 and 2].

A TRUE BILL:


FOREMAN: FEDERAL GRAND JURY

DONALD W. WASHINGTON
United States Attorney

By:


STEPHANIE A. FINLEY, ID # 20811
Assistant United States Attorney
800 Lafayette Street, Suite 2200
Lafayette, Louisiana 70501
Telephone: 337-262-6618