

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA	:	CRIMINAL NO.
	:	
v.	:	VIOLATION:
	:	18 U.S.C. § 1344 (Bank Fraud)
CHE M. BROWN,	:	
	:	
Defendant.	:	

INFORMATION

The United States Attorney charges that:

COUNT ONE - BANK FRAUD

Unless otherwise stated, at all times material to this Information:

1. From on or about September 2, 2009, through on or about September 14, 2010, CHE M. BROWN devised a scheme and artifice to defraud GMAC Mortgage LLC (“GMAC”), a mortgage lending and servicing business, and to obtain moneys, funds, credits, assets, securities, and other property owned by, and under the custody or control of, GMAC, by means of materially false and fraudulent pretenses, representations, and promises.

2. It was part of the scheme and artifice to defraud that, in conjunction with loan modification requests to GMAC, CHE M. BROWN submitted to GMAC documents that made it appear that he received approximately \$35,000 of income that he, in fact, never received.

3. On or about September 14, 2010, in the District of Columbia, CHE M. BROWN, in furtherance of the scheme and artifice set forth above, unlawfully, willfully, and knowingly executed, and attempted to execute, the scheme and artifice by submitting to GMAC an agreement that falsely certified the accuracy of each document submitted to GMAC in connection with the fraudulent scheme, including the documents that made it appear that he received approximately \$35,000 of income that he, in fact, never received.

(Bank Fraud, in violation of Title 18, United States Code, Section 1344.)

RONALD C. MACHEN JR.
United States Attorney

By:



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