

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

UNITED STATES OF AMERICA,	:	CRIMINAL NO.
	:	UNDER SEAL
v.	:	VIOLATIONS: 21 U.S.C. §846
	:	(Conspiracy to Distribute and Possess With
COREY M. DOUGLAS,	:	Intent to Distribute Cocaine);
Defendant.	:	18 U.S.C. § 1349, 1343
	:	(Conspiracy to Commit Wire Fraud)

SUPERSEDING INFORMATION

The United States Attorney charges that:

COUNT ONE

Between on or about October, 2005 and On or about April, 2007, within the District of Columbia, Maryland, and elsewhere, **COREY M. DOUGLAS**, did knowingly and willfully combine, conspire, confederate and agree with other persons both known and unknown to the United States, to unlawfully, knowingly and intentionally distribute and possess with intent to distribute:

(1) a mixture and substance containing a detectable amount of cocaine, a Schedule II narcotic drug controlled substance, and the amount of said mixture and substance was five kilograms or more; and

(2) a mixture and substance containing cocaine base, a Schedule II narcotic drug, and the amount of said mixture and substance was 50 grams or more, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A)(ii) and (iii).

(Conspiracy to Distribute and Possess With Intent to Distribute Cocaine and Cocaine Base, in violation of Title 21, United States Code, Section 846)

COUNT TWO

_____ Between in or about October, 2005 and On or about April, 2007, within the District of Columbia, Maryland, and elsewhere, **COREY M. DOUGLAS**, did knowingly and willfully combine, conspire, confederate and agree with other persons both known and unknown to the United States, to commit offenses against the United States, that is, wire fraud, accomplished by engaging in a scheme to defraud and to obtain money and property by means of false and fraudulent pretenses, representations, and promises, and the purpose of executing and attempting to execute the scheme to defraud, willfully causing to be transmitted wire communications in interstate commerce, in violation of Title 18, United States Code, Section 1343.

MANNER AND MEANS OF THE CONSPIRACY

1. It was part of the conspiracy that, beginning at least as early as 2005, **COREY M. DOUGLAS** and his co-conspirators identified certain houses that they wanted to purchase in the District of Columbia and Maryland, and took steps to prepare fraudulent documents, such as fraudulent Internal Revenue Service forms W-2, and forged pay stubs, so that it would falsely appear to mortgage lenders, and title attorneys, that the prospective buyer of that property made an income sufficient to qualify for a home loan in amount at least as high as the purchase price.

2. It was part of the conspiracy that **COREY M. DOUGLAS** and his co-conspirators would thereafter complete loan applications that included false employment and income information.

3. It was part of the conspiracy that **COREY M. DOUGLAS** and his co-conspirators would then submit these fraudulent loan applications via facsimile to various lenders, including but not limited to Fremont Investment and Loan, and WMC Mortgage for the purpose of securing a home loan.

4. It was also part of the conspiracy that **COREY M. DOUGLAS** and his co-conspirators would sometimes use straw-purchasers, that is, purchasers in name only, and stolen identities, that is the personal identifiers of innocent victims, in order to conceal the fact that **COREY M. DOUGLAS** was the actual purchaser of the home, to ensure that the loan would be extended, and further to ensure that the scheme would not be detected.

OVERT ACTS

In furtherance of the conspiracy, and to effect the illegal objects of thereof, **COREY M. DOUGLAS** and his co-conspirators committed certain overt acts between October 2004 and April 2007, including but not limited to the following:

- (a) On or about June 15, 2005, in the District of Columbia, **COREY M. DOUGLAS** caused a loan application to be sent from Maryland to Fremont Investment and Loan in Brea, California from Maryland, knowing that this loan application contained false information and with the intent to defraud the lender, in order to secure a loan for the property located at XXXX X XXXXXX, SE, Washington, DC.
- (b) In or about May and June, 2005, **COREY M. DOUGLAS** drove around Washington, DC, to look at and identify properties that he might purchase including the property on X XXXXXX.
- (c) On or about November 30, 2005, in the District of Columbia, **COREY M. DOUGLAS** caused a loan application to be sent from Maryland to WMC Mortgage in the State of Washington via facsimile, knowing that this loan application contained false information and with the intent to defraud the lender, in order to secure a loan for the property located at XXX

XXXXXXXXXX XXXXX, NE, Washington, DC.

- (d) In or about October and November, 2005, in the District of Columbia, **COREY M. DOUGLAS** drove around Washington, DC, to look at and identify properties that he might purchase, including the property on XXXXXXXXXXXX XXXXX.
- (e) On or about February 10, 2006, in the District of Columbia, **COREY M. DOUGLAS** and his co-conspirators caused a loan application to be sent from Maryland to Fremont Investment and Loan in Brea, California via facsimile, knowing that this loan application contained false information and with the intent to defraud the lender, in order to secure a loan for the property located at XXXX XXXXX XXXXXXXXXXXX XXXXXX, SE, Washington, DC.
- (f) In or about January and February, 2006, **COREY M. DOUGLAS** drove around Washington, DC, to look at and identify properties that he might purchase, including the property located on South Carolina Avenue.

JURISDICTION AND VENUE

The combination and conspiracy charged in Count Two of this Information was carried out in the District of Columbia, Maryland and elsewhere within the five years preceding the filing of this Information.

(Conspiracy to Commit Wire Fraud, in violation of Title 18, United States Code, Sections 1349 and 1343)

FORFEITURE ALLEGATION

1. The violations alleged in Count One and Count Two of this Information are re-alleged and incorporated by reference herein for the purpose of alleging forfeiture to the United States of America, pursuant to the provisions of Title 18, United States Code, Section 982, and Title 21, United States Code, Section 853.

2. As a result of the offenses alleged in Count One and Count Two, the defendant in this Information, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982, and Title 21, United States Code, Section 853, any property constituting, or derived from proceeds obtained directly or indirectly, as a result of the said violation, including but not limited to:

(a) Money Judgment:

a sum of money equal to \$800,000.00 (eight hundred thousand dollars) the total amount of money, representing the amount of proceeds obtained as a result of the offenses charged in Count One, conspiracy to distribute and possess with intent to distribute five kilograms or more of cocaine, and fifty 95) grams or more of cocaine base in violation of 21 U.S.C. §§ 846, 841(a)(1), and 841(b)(1)(a)(ii) and (iii), and in Count Two, Conspiracy to Commit Wire Fraud, in violation of Title 18, United States Code, Section 1349.

By virtue of the commission of the felony offenses charged in Count One and Count Two of this Information, any and all interest that the defendant has in the property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of the charged conspiracies, is vested in the United States and hereby forfeited to the United States pursuant to Title 18, United States Code, Section 982, and Title 21, United States Code, Section 853.

3. If any of the property described above as being subject to forfeiture pursuant to Title 21, United States Code, Section 853, as a result of any act or omission of the defendant(s):

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property that cannot be subdivided without difficulty;

it is the intention of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of said defendant up to the value of said property listed above as being subject to forfeiture.

(Criminal Forfeiture, in violation of Title 18, United States Code, Section 982, and Title 21, United States Code, Sections 853 and 853(p).)

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