

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS

**FILED**

U.S. DISTRICT COURT  
EASTERN DISTRICT OF TEXAS

MAR 11 2009

SHERMAN DIVISION

DAVID J. MALAND, CLERK  
BY  
DEPUTY \_\_\_\_\_

UNITED STATES OF AMERICA

§  
§  
§  
§  
§

V.

CRIMINAL NO. 4:09CR 35  
(Judge Scheel)

JEANELLE RICHARDSON

**INDICTMENT**

**COUNT 1**

Violation: 18 U.S.C. § 371  
(Conspiracy to commit Mail Fraud)

THE UNITED STATES GRAND JURY CHARGES THAT:

**A. INTRODUCTION**

At all times material to this indictment:

1. The "Real Estate Investor" was a person known to the Grand jury. The Real Estate Investor controlled entities known as Global Investments, Global Investment Group, Global MAP Corp., and Global Map Properties. The Real Estate Investor controlled bank accounts in the name of Global Investments, Global Investment Group, and Global Map Properties.

2. Federal Express was an interstate commercial carrier.

**B. THE CONSPIRACY**

3. From in or about, September 2005 through in or about January 2006, the defendant, JEANELLE RICHARDSON ("RICHARDSON"), together with the Real Estate Investor and others, both known and unknown to the Grand jury did knowingly and willingly combine, conspire, confederate and agree together and with each other to devise a scheme and artifice to defraud and to obtain money and property from mortgage companies by means of materially false and fraudulent pretenses, representations and promises, and for the purpose of executing the scheme and artifice, to knowingly send and deliver a matter and thing by private and interstate commercial carrier, a violation of Title 18, United States Code, Section 1341.

### **C. THE MANNER AND MEANS OF THE CONSPIRACY**

It was a part of the conspiracy and the scheme and artifice that:

4. The Real Estate Investor brokered the sales of residential real estate, which real estate was being sold by third parties, and in some cases being sold by himself.

#### **THIRD PARTY SELLERS**

5. The Real Estate Investor would find residential properties that were advertised as "For Sale By Owner". The Real Estate Investor would contact the sellers ("Sellers") and offer to sell the property for them, to a third party, for a price that was substantially above the Sellers' sales price. In return for the service, the Real Estate Investor would tell the Sellers that he wanted to keep the amount that was the difference

between the Sellers' original asking price and the final, increased sales price that he would obtain for the property.

#### THE APPRAISAL

6. The Real Estate Investor would obtain a real estate appraiser to appraise the property, which would result in an appraisal value that was substantially in excess of the Sellers' original asking price. In those cases where the Real Estate Investor was selling his own property, the appraisal value would be substantially greater than the price that the Real Estate Investor had paid to purchase the property.

#### THE BUYERS

7. The Real Estate Investor would then recruit RICHARDSON to purchase the residences referred to in paragraph five. The Real Estate Investor would pay RICHARDSON a fee for purchasing the property. In order to obtain approval of a mortgage loan for RICHARDSON, The Real Estate Investor and RICHARDSON would knowingly cause materially false statements to be made to a mortgage company in a mortgage loan application. The Real Estate Investor and RICHARDSON would cause all or some of the following false information to be submitted in the mortgage loan application:

- a. RICHARDSON's income would be overstated;
- b. RICHARDSON's employment would be misrepresented;  
RICHARDSON's employment would be reflected either as a self-

employed owner of a software firm, or as employed by Global MAP Corp.;

- c. A false and/or forged letter from an accountant would be submitted verifying the existence of the RICHARDSON's business;
- d. RICHARDSON's bank account balance would be overstated in that the Real Estate Investor would: 1) temporarily deposit money into RICHARDSON's bank account to make it appear RICHARDSON had more liquid funds than what she really had on deposit, and/or 2) the Real Estate Investor's account number was falsely represented on the verification of deposit form as the account number of RICHARDSON;
- e. RICHARDSON would represent that she intended to occupy the residence as her primary residence; and
- f. In cases in which RICHARDSON owned more than one residence, that fact was not disclosed on the loan application when responding to the request that the applicant disclose all real estate that she owned.

#### THE CLOSING

8. RICHARDSON would attend the closing of the sales transaction and execute the mortgage loan documents. RICHARDSON would also knowingly execute a

document in which RICHARDSON represented that she would occupy the residence as her primary residence, which RICHARDSON knew was false. In some instances, the mortgage documents which had been executed by the Sellers or the Real Estate Investor, and RICHARDSON, would be sent by an interstate commercial carrier from the closing to the mortgage company.

DEFAULT

9. RICHARDSON defaulted on the mortgage payments shortly after purchasing the residences.

**D. THE OVERT ACTS OF THE CONSPIRACY**

On or about the following dates, in furtherance of the conspiracy, the conspirators committed and caused, among others, the following overt acts:

PINEHURST PROPERTY

10. In or about September 2005, the Real Estate Investor recruited RICHARDSON to be a buyer for a residence at 5 Pinehurst in Frisco, Texas, ("Pinehurst Property") for a price of \$634,777.00.

11. In or about September 2005, the Real Estate Investor and RICHARDSON met in Collin County, Texas, within the Eastern District of Texas, to sign papers for the purchase of the Pinehurst Property.

12. In or about September 2005, the Real Estate Investor and RICHARDSON caused a fraudulent mortgage loan application to be submitted to Long Beach Mortgage,

within the Eastern District of Texas, requesting a mortgage loan of \$507,821 to purchase the Pinehurst Property.

13. In or about September 2005, the Real Estate Investor and RICHARDSON caused a fraudulent mortgage loan application to be submitted to Long Beach Mortgage, within the Eastern District of Texas, requesting a mortgage loan of \$126,955 to purchase the Pinehurst Property.

14. On or about September 19, 2005, RICHARDSON attended the closing on the purchase of the Pinehurst Property, and executed loan documents to obtain the mortgage loans for the property.

15. On or about September 19, 2005, within the Eastern District of Texas, the Real Estate Investor caused a cashier's check to be purchased at the West Plano Branch of Hibernia Bank in the amount of \$8,618.

16. On or about September 19, 2005, RICHARDSON paid closing costs using the cashier's check in the amount of \$8,618 that had been purchased the same date by the Real Estate Investor at the West Plano Branch of Hibernia Bank.

17. On or about September 20, 2005, a check from Texas Title to Global Map Corp, in the amount of \$184,777 was deposited to a bank account controlled by the Real Estate Investor.

18. On or about September 27, 2005, at the Stonebriar Branch of Hibernia Bank, within the Eastern District of Texas, a \$10,000 cashier's check was purchased by the Real Estate Investor and made payable to RICHARDSON.

19. On or about September 28, 2005, RICHARDSON negotiated the \$10,000 cashier's check received from the Real Estate Investor.

HAVERFORD PROPERTY

20. In or about October 2005, the Real Estate Investor recruited RICHARDSON to be a buyer for a residence at 4679 Haverford, Frisco, Texas, ("Haverford Property") for a price of \$625,000.00.

21. In or about October 2005, the Real Estate Investor and RICHARDSON met in Collin County, Texas, within the Eastern District of Texas, to sign papers relating to the purchase of the Haverford Property.

22. On or about October 21, 2005, the Real Estate Investor and RICHARDSON caused a fraudulent mortgage loan application to be submitted to IndyMac FSB, requesting a mortgage loan of \$500,000 to purchase the Haverford Property.

23. On or about October 21, 2005, the Real Estate Investor and RICHARDSON caused a fraudulent mortgage loan application to be submitted to IndyMac FSB, requesting a mortgage loan of \$125,000 to purchase the Haverford Property.

24. On or about October 21, 2005, RICHARDSON attended the closing on the purchase of the Haverford Property, and executed loan documents to obtain the mortgage loans for the property.

25. On or about October 21, 2005, the Real Estate Investor caused a check in the amount of \$155,688.63 from Reunion Title to be deposited to a Hibernia bank account he controlled.

26. On or about October 23, 2005, RICHARDSON and the Real State Investor caused the payoff funds and release form to the Haverford Property to be transported by Federal Express from Reunion Title, Garland, Texas, to the seller's lender, Aegis Mortgage Corporation in Houston, Texas.

27. On or about November 1, 2005, at the Spring Creek Branch of Hibernia Bank, within the Eastern District of Texas, a \$10,000 cashier's check was purchased by the Real Estate Investor and made payable to RICHARDSON .

28. On or about November 1, 2005, RICHARDSON negotiated the \$10,000 cashier's check received from the Real Estate Investor.

#### HIGH POINT PROPERTY

29. In or about November 2005, the Real Estate Investor recruited RICHARDSON to be a Buyer for a residence at 426 High Point, Murphy, Texas, ("High Point Property") for a price of \$598,500.00.

30. In or about November 2005, the Real Estate Investor and RICHARDSON met in Collin County, Texas, within the Eastern District of Texas, to sign documents relating to the purchase of the High Point Property.

31. On or about November 8, 2005, the Real Estate Investor and RICHARDSON fraudulently caused a mortgage loan application to be submitted to BNC Mortgage, Inc., requesting a mortgage loan of \$478,800.

32. On or about November 8, 2005, the Real Estate Investor and RICHARDSON fraudulently caused a mortgage loan application to be submitted to BNC Mortgage, Inc., requesting a mortgage loan of \$119,700.

33. On or about November 8, 2005, RICHARDSON attended the closing on the purchase of the residence at High Point Property and executed loan documents to obtain the mortgage loans for the property.

34. On or about November 9, 2005, RICHARDSON and the Real Estate Investor caused the lender generated closing documents from the purchase of the High Point Property to be transported from a location Reunion Title in Garland Texas, by Federal Express to BNC Mortgage Inc, in Corona, California.

35. On or about November 8, 2005, the Real Estate Investor caused a wire transfer, in the amount of \$353,244.15, to be made by Richmond Title to a Hibernia bank account he controlled.

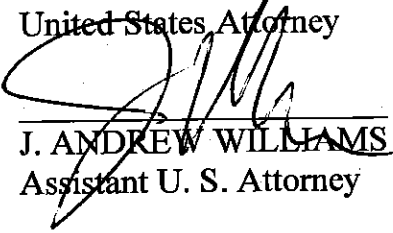
36. On or about November 14, 2005, the Real Estate Investor executed a \$19,500 transfer of funds from one of his accounts to an account held by RICHARDSON at the Stonebriar Branch of Hibernia Bank, within the Eastern District of Texas.

A TRUE BILL



Foreperson of the Grand Jury

REBECCA A. GREGORY  
United States Attorney



J. ANDREW WILLIAMS  
Assistant U. S. Attorney

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UNITED STATES OF AMERICA       §  
  §  
V.                                     §       CRIMINAL NO. 4:09CR \_\_\_\_\_  
  §  
JEANELLE RICHARDSON           §

**NOTICE OF PENALTY**

**COUNT 1**

**Violation:**           18 U.S.C. 371  
                                  (Conspiracy to Commit Mail Fraud)

**Penalty:**             A fine of not more than \$250,000, and/or  
                                  imprisonment for not more than 5 years.

**Special Assessment:** \$100.00