

**ORIGINAL**

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA

ATLANTA DIVISION

SEP 29 2005

By: [Signature] ERK  
Deputy Clerk

UNITED STATES OF AMERICA

v.

MATTHEW BEVAN COX,  
a/k/a Maxwell Price,  
David R. Freeman,  
Gerald Scott Cugno,  
Michael S. Shanahan,  
Michael J. Eckert,  
Gary L. Sullivan and  
David White;  
and  
REBECCA MARIE HAUCK,  
a/k/a Grace E. Hudson,  
Theresa A. Knight,  
Donna Anne Martin,  
Michielle Vayomi Joseph and  
Michielle Robinson Joseph;  
DEFENDANTS.

CRIMINAL INDICTMENT

NO.

1 05-CR-456

THE GRAND JURY CHARGES THAT:

COUNT ONE  
Conspiracy  
18 U.S.C. 371

1. From in or about November 2003 through on or about September 27, 2005, in the Northern District of Georgia and elsewhere, defendants MATTHEW BEVAN COX and REBECCA MARIE HAUCK did willfully, knowingly and unlawfully combine, conspire, confederate, agree and have a tacit understanding with each other and others, known and unknown to the Grand Jury, to commit certain offenses

against the United States, including the following:

(a) To devise a scheme and artifice to defraud real estate owners, title insurers, mortgage insurers, mortgage lenders and other lenders by making and causing to be made materially false and fraudulent representations, pretenses and promises to obtain money and property, causing the Postal Service and other interstate carriers to be used and interstate wire communications to be made in furtherance of said scheme and artifice to defraud, in violation of Title 18, United States Code, Sections 1341 and 1343.

(b) To knowingly execute and attempt to execute a scheme and artifice to defraud insured depository financial institutions, as defined in Title 18, United States Code, Section 20, by knowingly submitting and causing to be submitted materially false qualifying information and documentation and other fraudulent representations to obtain mortgage loans and credit cards from banks, in violation of Title 18, United States Code, Section 1344.

(c) To, with intent to deceive, falsely represent and cause to be represented certain social security numbers (SSNs), including those assigned to minor children, for the purpose of obtaining for the defendants, their co-conspirators and others fraudulently derived loan proceeds, bank accounts, credit cards, mail drops, rental properties, telephone service, drivers licenses, state identification cards and for other purposes, in violation of Title 42, United States Code, Section 408(a)(7)(B).

(d) To knowingly and without lawful authority produce and caused to be produced identification documents and false identification documents, in violation of Title 18, United States Code, Section 1028(a)(1).

(e) To knowingly transfer and caused to be transferred an identification document and a false identification document knowing that such document was stolen and produced without lawful authority, in violation of Title 18, United States Code, Section 1028(a)(2).

(f) To knowingly possess with intent to use unlawfully or transfer unlawfully five or more identification documents (other than those issued lawfully for the use of the possessor) and false identification documents, in violation of Title 18, United States Code, Section 1028(a)(3).

(g) To transport, transmit and transfer in interstate and foreign commerce goods, wares, merchandise, securities and money having a value of \$5,000 or more, knowing the same to have been stolen, converted and taken by fraud, in violation of Title 18, United States Code, Section 2314.

(h) To knowingly engage in monetary transactions in the United States which affected interstate commerce, involving criminally derived property of a value greater than \$10,000, that was derived from specified unlawful activity, that is acts indictable under Title 18, United States Code, Sections 1028, 1341,

1343, 1344 and 2314 being identity theft and fraud, mail fraud, wire fraud, bank fraud and interstate transportation of fraud proceeds, as further described in Counts One through Thirteen and Thirty-Three through Forty-Two of this Indictment, in violation of Title 18, United States Code, Section 1957.

(i) To knowingly and without lawful authority cause to be transferred and used a means of identification of another person, including their name and/or social security number, with intent to commit and aid and abet in the commission of the federal felony offenses indictable under Title 18, United States code, Sections 1341, 1343, 1344, 2314, 1957, being mail fraud, wire fraud, bank fraud, interstate transportation of fraud proceeds and money laundering as further described in Count One through Thirty-Two of this Indictment, and as the result of these transfers and uses the defendants obtained things of value aggravating more than \$1,000 in a one year period, in violation of Title 18, United States Code, Section 1028(a)(7).

Manner and Means

2. The manner and means by which the conspiracy was sought to be accomplished by defendants MATTHEW BEVAN COX and REBECCA MARIE HAUCK, included, among others, the following:

Mortgage Loans:

(a) To obtain possession of residential properties in Georgia, Florida, South Carolina and elsewhere by using the stolen

identities of other persons to either rent or promise to purchase the properties.

(b) To fraudulently cancel all liens securing outstanding mortgage loans on these properties, including liens held by federally insured financial institutions.

(c) To, on occasion, file a fraudulent lien on the property in the name of a shell company.

(d) To obtain and attempt to obtain multiple mortgage loans from federally insured financial institutions and other lenders on the same property at the same time in stolen identities, posing as either the true owner or the recent purchaser.

(e) To cause loan proceeds to be paid by closing attorney checks payable either to the defendants in the stolen identity used for each mortgage loan, to their other stolen identities or to the shell company used to file a fraudulent lien against at least one of the properties.

(f) To negotiate said checks containing mortgage loan fraud proceeds by depositing the checks into bank accounts opened in the stolen identity or shell company name of the check payee, by purchasing cashiers checks with the loan proceeds checks in the same and different stolen identities and by cashing or depositing the cashiers checks into other bank accounts also opened in stolen identities.

Vehicle Loans:

(g) To obtain vehicle loans in stolen identities with false qualifying information.

(h) To drive such fraudulently obtained vehicles between Georgia, Alabama, Florida, Tennessee, North Carolina, South Carolina and elsewhere to open "mail drops," obtain counterfeit or fraudulent identification documents, open bank accounts and apply for credit and debit cards, rent apartments and houses, erase prior mortgage loans, apply for new mortgage loans, attend mortgage loan closings, and launder scheme proceeds.

Credit Cards:

(i) To apply for credit and debit cards in stolen identities, causing the federally insured issuing banks to mail the cards to Atlanta, Georgia area addresses.

(j) To launder mortgage fraud scheme proceeds through credit and debit card purchases and withdrawals.

Bank Accounts:

(k) To open bank accounts in stolen identities at federally insured financial institutions, including United Americas Bank, SouthTrust Bank and SunTrust Bank in the Atlanta, Georgia area and to travel from the Atlanta, Georgia area to Columbia, South Carolina where accounts in stolen identities were opened at Bank of America, Carolina First Bank, First Citizens Bank, First Community Bank, Regions Bank, SouthTrust Bank and Wachovia Bank.

(l) To purchase multiple cashiers checks at said banks from scheme proceeds and thereafter negotiate, deposit and cash the checks through multiple accounts.

(m) To use said accounts to further launder mortgage fraud scheme proceeds.

Identification Documents:

(n) To travel between Georgia, Alabama, Tennessee, North Carolina and South Carolina where state-issued drivers licenses and identification cards bearing photographs of the defendants were obtained in stolen identities.

(o) To cause counterfeit Florida drivers licenses and state identification cards to be made in stolen identities bearing photographs of the defendants.

Addresses:

(p) To rent "mail drops," a virtual office and apartments in the Alpharetta, Atlanta, Marietta and Roswell, Georgia, Anniston, Alabama, Columbia, South Carolina and Charlotte, North Carolina areas in stolen identities, using either fraudulent state-issued or counterfeit identification documents.

Telephone Service:

(q) To obtain telephone service using stolen identities and the SSNs of other persons.

Overt Acts

3. In furtherance of this conspiracy, and to effect the

objects and purposes thereof, various overt acts were committed by the defendants and their coconspirators within the Northern District of Georgia and elsewhere, including but not limited to the following:

Acts related to 1537 Proctor Street, Tallahassee, Florida

(1) On or about December 11, 2003, defendant MATTHEW BEVAN COX obtained cell phone number 404-944-0150 from T-Mobile in the stolen identity of Maxwell Price and thereafter caused the bill to be mailed to Maxwell Price at 3105 Keyingham Way, Alpharetta, Georgia.

(2) On or about December 12, 2003, in the Northern District of Georgia, defendant REBECCA MARIE HAUCK rented a Post Parkside apartment at 250 10th Street, Atlanta, Georgia in the stolen identity of Grace E. Hudson, using the SSN of another person, a Hudson contact phone number of 404-944-0150, a fake Pluto Group employer with supervisor Maxwell Price and annual income of \$80,000 and a Grace Elizabeth Hudson counterfeit Florida state identification card bearing the photograph of defendant HAUCK.

(3) On or about December 15, 2003, in the Northern District of Georgia, defendant MATTHEW BEVAN COX opened a "mail drop" at the The UPS Store at 3600 Dallas Highway, Marietta, Georgia, using the stolen identity of David R. Freeman and a counterfeit Freeman state of Florida identification card bearing the photograph of defendant COX.



(4) On or about December 16, 2003, in the Northern District of Georgia, defendant MATTHEW BEVAN COX obtained cell phone number 678-570-3416 from Virgin Mobile in the stolen identity of David Freeman.

(5) On or about December 17, 2003, in the Northern District of Georgia, defendant MATTHEW BEVAN COX rented a "virtual office" and was assigned phone number 404-885-6031 for Lloyd's and Associates, Inc. from HQ Global Workplaces at 1170 Peachtree Street, Suite 1200, Atlanta, Georgia, using the stolen identity of David R. Freeman, the SSN of another person, the Freeman address of 3600 Dallas Highway, Marietta, Georgia, and the contact number of 678-570-3416.

(6) On or about December 19, 2003, defendants MATTHEW BEVAN COX and REBECCA MARIE HAUCK traveled from the Northern District of Georgia to Anniston, Alabama where they rented a "mail drop" from The UPS Store at 1414 Golden Springs Road in the stolen identities of David Richard Freeman and Grace Hudson, using a contact phone number of 678-570-3416 and counterfeit Florida state identification cards in the names of Freeman and Hudson bearing the photographs of defendants COX and HAUCK, respectively.

(7) On or about December 23, 2003, defendant MATTHEW BEVAN COX traveled from the Northern District of Georgia to Alabama where he obtained a state-issued temporary Alabama drivers license using the stolen name and SSN of Gerald Scott Cugno, a fraudulently

obtained Florida Cugno birth certificate, a Cugno residence address of 1414 Golden Springs Road, Anniston, Alabama, a fake Lloyd's and Associates Cugno employment and a Cugno contact phone number of 678-570-3416.

(8) On or about December 29, 2003, in the Northern District of Georgia, defendant REBECCA MARIE HAUCK submitted an application and obtained a Bank of America Visa credit card in the stolen identity of Grace E. Hudson, using the SSN of another person, the 250 10th Street, Atlanta, Georgia address for Hudson, a Hudson contact phone number of 404-944-0150 and the employer of Lloyd's and Associates with annual income of \$80,000.

(9) On or about December 30, 2003, in the Northern District of Georgia, defendant MATTHEW BEVAN COX opened a checking account at the Marietta, Georgia Branch of United Americas Bank in the stolen David R. Freeman identity, using a stolen SSN assigned to another person, a counterfeit state of Florida Freeman identification card, a Freeman address of 3600 Dallas Highway, Marietta, Georgia and a contact phone number of 678-570-3416.

(10) In or about early January 2004, in the Northern District of Georgia, defendants MATTHEW BEVAN COX and REBECCA MARIE HAUCK each obtained Chase MasterCard credit cards in the respective stolen identities of David R. Freeman and Grace E. Hudson, using the SSNs of other persons, the 3600 Dallas Highway, Marietta, Georgia address for Freeman, the 250 10th Street, Atlanta, Georgia

address for Hudson, Freeman contact phone number 678-570-3416, Hudson contact phone number of 404-944-0150, the Freeman employer as Lloyd's and Associates and the Hudson employer as Pluto Group.

(11) In or about early January 2004, in the Northern District of Georgia, defendant MATTHEW BEVAN COX obtained an United Americas Bank Visa credit cards in the stolen identity of David R. Freeman, using the SSN of another person, the 3600 Dallas Highway, Marietta, Georgia address for Freeman.

(12) On or about January 8, 2004, in the Northern District of Georgia, defendant MATTHEW BEVAN COX applied for a \$16,267 vehicle loan for the purchase of a 2003 silver Honda Element SUV from Ed Voyles Honda in the stolen identity of Gerald Scott Cugno using false qualifying information, including the stolen Cugno name, the SSN of another person, a fake Cugno employment at the Pluto Group, Inc. as an adjuster with a \$6,800 monthly income, a current Cugno address of 1414 Gold Springs Road, Anniston, Alabama, a Cugno contact phone number of 678-570-3416, a fraudulently obtained Cugno Florida birth certificate and a fraudulent temporary Alabama drivers licence in the stolen identity of Gerald Scott Cugno bearing the photograph of defendant COX, as well as Cugno references of Maxwell Price at 1200 Peachtree Street, Atlanta, Georgia with contact number 404-885-5701, David Freeman at 3600 Dallas Highway, Marietta, Georgia with contact number 404-885-6031 and Grace Hudson at 250 10th Street, Atlanta, Georgia with

contact phone number 404-944-0150.

(13) On or about January 15, 2004, in the Northern District of Georgia, defendant REBECCA MARIE HAUCK opened a checking account at the Atlanta, Georgia Branch of United Americas Bank in the stolen identity of Grace E. Hudson, using a stolen SSN assigned to another person, a Hudson fake employer of Lloyd's and Associates, a Hudson address of 250 10th Street, Atlanta, Georgia, a Hudson contact phone number of 404-944-0150 and a counterfeit state of Florida Hudson identification card bearing the photograph of defendant HAUCK,

(14) On or about January 25, 2004, in the Northern District of Georgia, defendant REBECCA MARIE HAUCK obtained phone number 678-240-0611 from BellSouth in the stolen identity of Grace E. Hudson, using the address of 3105 Keyingham Way, Alpharetta, Georgia.

(15) In or about late January 2004, in the Northern District of Georgia, defendant MATTHEW BEVAN COX applied for and obtained First Premier Bank MasterCard credit card in the stolen identity of Mike S. Shanahan, using the SSN of another person, the 10800 Alpharetta Highway, Roswell Georgia address for Shanahan and a contact phone number of 678-570-3416.

(16) On or about January 29, 2004, defendant MATTHEW BEVAN COX traveled from the Northern District of Georgia to the Northern District of Florida where he rented 1537 Proctor Street in

Tallahassee, Florida, from property owner Theresa A. Knight, using the stolen identity of David Freeman, the address of 3600 Dallas Highway, Marietta, Georgia, a Freeman rent check drawn on his United Americas Bank account in Marietta, Georgia and a Freeman contact phone number of 678-570-3416.

(17) On or about February 3, 2004 ,defendant MATTHEW BEVAN COX mailed a letter from the Northern District of Georgia to The UPS Store at 1414 Gold Springs Road in Anniston, Alabama, enclosing a "mail drop" application in the stolen Gerald Scott Cugno identity with David Freeman to receive mail there also, providing as the required two pieces of identification the fraudulent Alabama state-issued temporary drivers license in the stolen identity of Gerald Scott Cugno and a Progressive Insurance Card for the 2003 Honda Element SUV purchased by defendant COX in the stolen Cugno identity, all enclosed documents bearing a Cobb county notary stamp.

(18) On or about February 9, 2004, defendant MATTHEW BEVAN COX traveled from the Northern District of Georgia to Alabama where he obtained a permanent state-issued Alabama drivers license in the stolen Gerald Scott Cugno identity.

(19) On or about February 10, 2004, in the Northern District of Georgia, defendant REBECCA MARIE HAUCK opened a "mail drop" at The UPS Store at 12850 Highway 9, Alpharetta, Georgia, using the stolen identity of Theresa Knight, the contact phone

number of 404-944-0150 and a counterfeit state of Florida identification card in the stolen identity of Theresa Knight bearing the photograph of defendant HAUCK.

(20) On or about February 10, 2004, defendant MATTHEW BEVAN COX traveled from the Northern District of Georgia to Tallahassee, Florida where on February 11th he filed with the Clerk of Courts for Leon County, Florida false Satisfaction of Mortgage forms dated December 11, 2003 with the forged signatures of purported Countrywide officers Ronn Pisaplia and Jarrod Gibson, thereby fraudulently eliminating Countrywide's security for their \$37,000 mortgage loan then outstanding on 1537 Proctor Street and caused the filed-stamped Satisfaction of Mortgage forms for the Proctor Street property to be mailed to Theresa Knight at 12850 Highway 9, Alpharetta, Georgia.

Sterling Trust Mortgage Attempted Loan

(21) On or about February 23, 2004, defendant REBECCA MARIE HAUCK provided, via fax from the Northern District of Georgia to Sterling Trust Mortgage in Davie, Florida, false qualifying information for a requested \$60,000 mortgage loan in the stolen identity of the true property owner, Theresa A. Knight, to be secured by 1537 Proctor Street, including a SSN assigned to another person, a fake Knight employer of Lloyd's and Associates at 1170 Peachtree Street, Atlanta, Georgia, a 3105 Keyingham Way, Alpharetta, Georgia current address for Theresa A. Knight, a 3600

Dallas Highway prior Knight address, Knight contact phone numbers of 404-944-0150 and 404-885-6031 and a counterfeit state of Florida identification card in the stolen identity of Theresa Knight bearing the photograph of defendant HAUCK.

(22) On or about February 29, 2004, in the Northern District of Georgia, defendant MATTHEW BEVAN COX wrote a check drawn on his David Freeman United Americas Bank account payable to Sterling Trust for the Proctor Street mortgage loan application fee required for the Theresa Knight loan.

Prime Credit Corporation Loan

(23) In or about late February and early March 2004, in the Northern District of Georgia, defendant REBECCA MARIE HAUCK spoke by telephone with Prime Credit Corporation in Tallahassee, Florida and provided false qualifying information for a \$53,000 mortgage loan in the stolen identity of Theresa A. Knight to be secured by 1537 Proctor Street, including the SSN of another person, fake Knight employment of Lloyd's and Associates, a false income of \$65,000 per year from Lloyd's plus Proctor Street rent of \$950 a month, a current address of 3105 Keyingham Way, a Knight fax number 678-240-0611 and Knight contact phone number 404-944-0150.

(24) On or about March 2, 2004, in the Northern District of Georgia, defendant REBECCA MARIE HAUCK signed "T. Knight" on pre-closing documents for the \$53,000 mortgage loan in the stolen identity of Theresa Knight to be secured by Proctor

Street and faxed the documents to Prime Credit Corporation in Tallahassee, Florida.

(25) On or about March 3, 2004, defendants MATTHEW BEVAN COX and REBECCA MARIE HAUCK traveled in their Gerald Cugno Honda Element SUV from the Northern District of Georgia to Tallahassee, Florida to attend the March 4th closing of the Prime Credit Corporation mortgage loan obtained in the stolen identity of Theresa A. Knight secured by 1537 Proctor Street where defendant HAUCK signed the loan documents as T. Knight in the presence of defendant COX and directed the loan closer to void the loan proceeds check then payable to borrower Theresa Knight and to reissue two checks payable to Grace Hudson in the amounts of \$10,000 and \$10,004.50 and two checks of \$15,000 each payable to David Freeman.

(26) On or about March 4, 2004, defendants MATTHEW BEVAN COX cashed the two \$15,000 loan proceeds checks payable to David Freeman at People's First Bank in Tallahassee, Florida, retained \$2,000 in cash and purchased two cashiers checks payable to David Freeman in the amounts of \$15,000 and \$13,000.

(27) On or about March 4, 2004, defendants MATTHEW BEVAN COX and REBECCA MARIE HAUCK traveled in the Honda Element SUV obtained in the stolen Gerald Cugno identity from Tallahassee, Florida back to the Northern District of Georgia.

(28) On or about March 5, 2004, in the Northern District



of Georgia, defendant MATTHEW BEVAN COX negotiated the \$15,000 David Freeman cashiers check purchased on March 4, 2004 at People's First Bank by depositing \$14,000 into his United Americas Bank account obtained in the stolen identity of David Freeman and taking \$1,000 in cash.

(29) On or about March 8, 2004, in the Northern District of Georgia, defendant REBECCA MARIE HAUCK deposited her People's First \$10,004.50 Grace Hudson closing check dated March 4, 2004 into her United Americas Bank account obtained in the stolen identity of Grace Hudson.

(30) On or about March 8, 2004, in the Northern District of Georgia, defendant REBECCA MARIE HAUCK delivered \$250 in cash to The Swan Center for Plastic Surgery and filled out a Patient Information form in the stolen identity of Grace E. Hudson, listing the stolen SSN of another person, a current address of 3105 Keyingham Way, Alpharetta, Georgia, a Hudson contact phone number of 678-570-3416 and David Freeman as her boyfriend.

(31) On or about March 11, 2004, in the Northern District of Georgia, defendant REBECCA MARIE HAUCK deposited her People's First \$10,000 Grace Hudson closing check dated March 4, 2004 into her United Americas Bank account obtained in the stolen identity of Grace Hudson.

(32) On or about March 11, 2004, in the Northern District of Georgia, defendant MATTHEW BEVAN COX deposited his remaining

David Freeman \$13,000 cashiers check purchased on March 4, 2004 from People's First Bank into his United Americas Bank account obtained in the stolen identity of David Freeman.

(33) On or about March 15, 2004, in the Northern District of Georgia, defendant MATTHEW BEVAN COX purchased a \$11,545 cashiers check payable to The Swan Center from the proceeds of his United Americas Bank account obtained in the stolen David Freeman identity.

(34) On or about March 17, 2004, in the Northern District of Georgia, defendant MATTHEW BEVAN COX, using the stolen identity of David Freeman, accompanied defendant REBECCA MARIE HAUCK, using the stolen identity of Grace Hudson, to The Swan Center for Plastic Surgery for surgical procedures paid with proceeds from the fraudulent Procter Street mortgage loan.

Acts related to 3826 Glenlake Drive, Douglasville, Georgia

(35) In or about November 2003, in the Northern District of Georgia, defendant MATTHEW BEVAN COX, using the stolen identity of David Freeman inquired about purchasing 3826 Glenlake Drive, advising the property owner that he had been living out the country for a number of years and, therefore, had no reported credit in the United States.

(36) On or about January 4, 2004, in the Northern District of Georgia, defendant MATTHEW BEVAN COX used the stolen identity of David Freeman and the SSN of another person to obtain

owner financing for the purchase of 3826 Glenlake Drive.

(37) On or about January 21, 2004, in the Northern District of Georgia, defendants MATTHEW BEVAN COX and REBECCA MARIE HAUCK, using the stolen identities of David Freeman and Grace Hudson, rented Glenlake Drive to a tenant and directed him to mail his rental checks to 3105 Keyingham Way in Alpharetta, Georgia.

Acts related to 3105 Keyingham Way, Alpharetta, Georgia

(38) In or about late December 2003, in the Northern District of Georgia, defendant REBECCA MARIE HAUCK, using the stolen identity of Grace Elizabeth Hudson, responded to a newspaper advertizement placed by true owner Michael Shanahan for the rental of his property at 3105 Keyingham Way.

(39) On or about December 31, 2003, in the Northern District of Georgia, defendant MATTHEW BEVAN COX filed a false Cancellation of Deed to Secure Debt dated November 22, 2003 with the Fulton County Georgia Clerk of the Superior Court and provided an addressed envelope for mailing a file-stamped copy of this cancellation to Michael Shanahan at 3105 Keyingham Way, thereby fraudulently eliminating the Bank of America security interest for their then outstanding \$137,500 first mortgage on this property.

(40) On or about January 13, 2004, in the Northern District of Georgia, defendant REBECCA MARIE HAUCK, using the stolen identity of Grace Elizabeth Hudson, signed an application to rent 3105 Keyingham Way, listing false qualifying information,

including the stolen name of Grace Hudson, the stolen SSN of another person, a fake Hudson employer of Lloyd's and Associates with an annual income of \$85,000, a Hudson contact phone number of 404-885-6031 and the stolen identity of David Freeman as a Hudson friend/boss; defendant HAUCK thereafter wrote several rent checks to owner Michael Shanahan drawn on her United Americas Bank account obtained in the stolen Grace Hudson identity.

(41) On or about January 16, 2004, in the Northern District of Georgia, defendant MATTHEW BEVAN COX filed a false Cancellation of Deed to Secure Debt dated December 5, 2003 with the Fulton County Georgia Clerk of the Superior Court and provided a contact number of 678-570-3416 and an addressed envelope for mailing a file-stamped copy of this cancellation to Michael S. Shanahan at 3105 Keyingham Way, thereby fraudulently eliminating the Bank of America security interest for their then outstanding \$35,849 second mortgage on this property.

(42) On or about February 26, 2004, in the Northern District of Georgia, defendant MATTHEW BEVAN COX rented a "mail drop" from The UPS Store at 10800 Alpharetta Highway, Roswell, Georgia in the stolen identity of Michael Shanahan, using a Shanahan address of 3105 Keyingham Way, a contact phone number of 678-570-3416, a counterfeit social security card and a counterfeit Florida drivers license in the stolen identity of Michael Shawn Shanahan bearing the photograph of defendant COX.

(43) On or about May 13, 2004, in the Northern District of Georgia, defendant MATTHEW BEVAN COX opened a SunTrust Bank account in the stolen identity of Gerald Scott Cugno, using a stolen SSN of another person and a 3105 Keyingham Way address.

(44) On or about May 17, 2004, in the Northern District of Georgia, defendant MATTHEW BEVAN COX opened a SouthTrust Bank account in the stolen identity of Michael S. Shanahan, using a stolen SSN of another person, a Shanahan address of 3105 Keyingham Way, Shanahan contact numbers of 678-570-3416 and 404-885-6031 and a counterfeit Florida drivers license in the stolen identity of Michael Shawn Shanahan bearing the photograph of defendant COX.

Fieldstone Investments Loan

(45) On or about April 29, 2004, in the Northern District of Georgia, defendant MATTHEW BEVAN COX, using the stolen identity of true property owner Michael Shanahan, applied for a \$106,000 mortgage loan from Fieldstone Investments to be secured by 3105 Keyingham Way, falsely representing that he owned Keyingham "free and clear" and providing other false qualifying information, including the stolen borrower name of Michael Shanahan, the stolen SSN of another person, a fake employer of Lloyd's and Associates, Shanahan contact phone numbers of 678-570-3416 and 404-885-6031 and a current Shanahan address of 10800 Alpharetta Highway, Roswell, Georgia.

(46) On or about May 6, 2004, in the Northern District

of Georgia, defendant MATTHEW BEVAN COX, using the stolen identity of true property owner Michael Shanahan, attended closing for the \$106,000 Fieldstone Investments mortgage loan, signed the HUD1 Settlement Statement and all closing documents as Michael S. Shanahan and received a loan proceeds check for \$97,955.49 payable to Michael S. Shanahan.

(47) On or about May 6, 2004, in the Northern District of Georgia, defendant MATTHEW BEVAN COX cashed the \$97,955.49 Michael S. Shanahan loan proceeds check at SunTrust Bank, received \$8,000 in cash and purchased three SunTrust cashiers checks-payable to G. Scott Cugno in the amount of \$61,875, to David Freeman in the amount of \$17,955.49 and to Grace Hudson in the amount of \$10,125.

(48) On or about May 7, 2004, in the Northern District of Georgia, defendant MATTHEW BEVAN COX cashed the G. Scott Cugno \$61,875 SunTrust cashiers check dated May 6, 2004 at SunTrust Bank, kept \$8,500 cash and purchased a \$53,367 cashiers check payable to G. Scott Cugno.

(49) On or about May 7, 2004, in the Northern District of Georgia, defendant MATTHEW BEVAN COX deposited the David Freeman \$17,955.49 cashiers check dated May 6, 2004 into the United Americas Bank account obtained in the stolen David Freeman identity.

(50) On or about May 7, 2004, in the Northern District

of Georgia, defendant REBECCA MARIE HAUCK deposited the Grace Hudson \$10,125 cashiers check dated May 6, 2004 into the United Americas Bank account obtained in the stolen Grace Hudson identity.

(51) On or about May 10, 2004, in the Northern District of Georgia, defendant MATTHEW BEVAN COX cashed the G. Scott Cugno \$53,375 cashiers check dated May 7, 2004 at SunTrust Bank, kept \$8,516 cash and purchased a \$44,858 cashiers check payable to G. Scott Cugno.

(52) On or about May 14, 2004, in the Northern District of Georgia, defendant MATTHEW BEVAN COX deposited the G. Scott Cugno \$44,859 cashiers check dated May 10, 2004 into the SunTrust Bank account obtained in the stolen Gerald Scott Cugno identity.

Yale Mortgage Loan

(53) On or about April 28, 2004, in the Northern District of Georgia, defendant MATTHEW BEVAN COX, using the stolen identity of true property owner Michael Shanahan, applied with Team One Mortgage for a \$117,000 mortgage loan from Yale Mortgage to be secured by 3105 Keyingham Way, falsely representing that he owned Keyingham "free and clear" and providing other false qualifying information, including the stolen borrower name of Michael Shanahan, the stolen SSN of another person, a fake employer of Lloyd's and Associates, a Shanahan contact phone number of 678-570-3416, a current Shanahan address of 10800 Alpharetta Highway, Roswell, Georgia and a counterfeit Florida drivers license in the

stolen identity of Michael Shawn Shanahan bearing the photograph of defendant COX.

(54) On or about May 7, 2004, in the Northern District of Georgia, defendant MATTHEW BEVAN COX, using the stolen identity of true property owner Michael Shanahan, attended closing for the \$117,000 Yale Mortgage loan, signed the HUD1 Settlement Statement and all closing documents as Michael S. Shanahan and received a loan proceeds check for \$102,905.95 payable to Michael S. Shanahan.

(55) On or about May 7, 2004, in the Northern District of Georgia, defendant MATTHEW BEVAN COX cashed the \$102,905.95 Michael S. Shanahan loan proceeds check at Charter Bank, now Bank of North Georgia, received \$8,470 in cash and purchased three Charter cashiers checks- payable to Gerald S. Cugno in the amount of \$74,595.95, to David Freeman in the amount of \$8,600 and to Grace Hudson in the amount of \$11,210.

(56) On or about May 10, 2004, in the Northern District of Georgia, defendant REBECCA MARIE HAUCK deposited the Grace Hudson \$11,210 cashiers check dated May 7, 2004 into the United Americas Bank account obtained in the stolen Grace Hudson identity.

(57) On or about May 10, 2004, in the Northern District of Georgia, defendant MATTHEW BEVAN COX cashed the Gerald S. Cugno \$74,595.95 cashiers check dated May 7, 2004 at Charter Bank, now Bank of North Georgia, received \$8,470 in cash and purchased three Charter cashiers checks- payable to Gerald S. Cugno in the amount



of \$29,000, to David Freeman in the amount of \$21,000 and to Grace Hudson in the amount of \$16,950.95.

(58) On or about May 11, 2004, in the Northern District of Georgia, defendant MATTHEW BEVAN COX cashed the Gerald S. Cugno \$29,000 cashiers check dated May 10, 2004 at Charter Bank and deposited the David Freeman \$21,000 cashiers check dated May 10, 2004 into the United Americas Bank account obtained in the stolen David Freeman identity, retaining \$9,000 cash.

(59) On or about May 11, 2004, in the Northern District of Georgia, defendant REBECCA MARIE HAUCK deposited the Grace Hudson \$16,095.95 cashiers check dated May 10, 2004 into the United Americas Bank account obtained in the stolen Grace Hudson identity.

(60) On or about May 17, 2004, in the Northern District of Georgia, defendant MATTHEW BEVAN COX deposited the \$8,600 David Freeman cashiers check dated May 7, 2004 into the United Americas Bank account obtained in the stolen David Freeman identity.

ThoughtForce Int'l/Sam Dobrow/R E Solutions Providers Loan

(61) On or about May 9, 2004, in the Northern District of Georgia, defendant MATTHEW BEVAN COX, using the stolen identity of true property owner Michael Shanahan, applied with Real Estate Solutions for a \$106,000 mortgage loan from ThoughtForce Int'l/Sam Dobrow/R E Solutions Providers to be secured by 3105 Keyingham Way, falsely representing that he owned Keyingham "free and clear" and providing other false qualifying information, including the stolen

borrower name of Michael Shanahan, the stolen SSN of another person, a fake Shanahan employer of Lloyd's and Associates with \$65,000 annual income, a Shanahan contact phone number of 678-570-3416, a current Shanahan address of 3600 Dallas Highway, Marietta, Georgia with landlord Grace Hudson at 404-944-0150 and a counterfeit Florida drivers license in the stolen identity of Michael Shawn Shanahan bearing the photograph of defendant COX.

(62) On or about May 12, 2004, in the Northern District of Georgia, defendant MATTHEW BEVAN COX, using the stolen identity of true property owner Michael Shanahan, attended closing for the \$106,000 ThoughtForce Int'l/Sam Dobrow/R E Solutions Providers mortgage loan, signed the HUD1 Settlement Statement and all closing documents as Michael S. Shanahan and received a loan proceeds check for \$98,755.20 payable to Michael S. Shanahan.

(63) On or about May 13, 2004, in the Northern District of Georgia, defendant MATTHEW BEVAN COX cashed the \$98,755.20 Michael S. Shanahan loan proceeds check at SouthTrust Bank, and purchased a \$98,755.20 SouthTrust cashiers checks payable to Michael S. Shanahan.

(64) On or about May 21, 2004, in the Northern District of Georgia, defendant MATTHEW BEVAN COX cashed the Michael S. Shanahan \$98,755.20 cashiers check dated May 13, 2004 at SouthTrust Bank, retained \$5,000 cash, purchased a \$78,755.20 SouthTrust cashiers check payable to Michael S. Shanahan and deposited \$15,000

into his SouthTrust account opened in the stolen Michael Shanahan identity.

(65) On or about May 26, 2004, in the Northern District of Georgia, defendant MATTHEW BEVAN COX deposited the Michael S. Shanahan \$78,755.20 cashiers check dated May 21, 2004 into his SouthTrust Bank account opened in the stolen Michael Shanahan identity and retained \$7,500 cash.

(66) On or about May 28, 2004, in the Northern District of Georgia, defendant MATTHEW BEVAN COX purchased two \$9,000 SouthTrust cashiers checks- payable to David Freeman and Grace Hudson from the proceeds of his SouthTrust account opened in the stolen Michael Shanahan identity.

(67) On or about June 1, 2004, in the Northern District of Georgia, defendants MATTHEW BEVAN COX and REBECCA MARIE HAUCK deposited their \$9,000 David Freeman and Grace Hudson SouthTrust cashiers checks into their respective United Americas Bank accounts opened in the stolen David Freeman and Grace Hudson identities.

Proctor Street and Keyingham Way Mortgage Loan Proceeds

(68) On or about March 8, 2004, in the Northern District of Georgia, defendant MATTHEW BEVAN COX obtained a "mail drop" in The UPS Store at 2221 Peachtree Road, Atlanta, Georgia in the stolen identity of Michael J. Eckert, presenting a counterfeit State Farm Insurance card and a Florida concealed weapon/firearm license in the stolen Eckert identity bearing the photograph of

defendant COX.

(69) On or about March 8, 2004, in the Northern District of Georgia, defendant MATTHEW BEVAN COX submitted an application for a Bank of America Visa credit card in the stolen Michael J. Eckert identity with the 2221 Peachtree Road, Atlanta, Georgia address.

(70) On or about April 7, 2004, defendants MATTHEW BEVAN COX and REBECCA MARIE HAUCK traveled from the Northern District of Georgia to North Carolina where defendant COX provided the stolen Michael John Eckert identity, the SSN of another person and a fraudulent Eckert birth certificate and social security card to fraudulently obtain a state-issued North Carolina state identification card in the stolen Eckert identity bearing the photograph of defendant COX.

(71) On or about April 8, 2004, defendant REBECCA MARIE HAUCK provided the stolen Donna Anne Martin identity, the SSN of another person to fraudulently obtain a state-issued North Carolina state identification in the stolen Martin identity bearing the photograph of defendant HAUCK.

(72) On or about April 12, 2004, defendants MATTHEW BEVAN COX and REBECCA MARIE HAUCK obtained a "mail drop" at Package Plus, 301 South Tryon Street in Charlotte, North Carolina in the stolen identities of Michael J. Eckert and Donna A. Martin, using the SSNs of other persons and fraudulently obtained North Carolina

state-issued identifications in the Eckert and Martin stolen identities bearing photographs of defendants COX and HAUCK respectively.

(73) On or about April 12, 2004, defendants MATTHEW BEVAN COX and REBECCA MARIE HAUCK rented an apartment with a May 7 move in date at Post Gateway, 120 North Cedar Street, Charlotte, North Carolina in the stolen identity of Michael J. Eckert with Donna Martin listed as an emergency contact, using the SSNs of another person, a present Eckert address of 2221 Peachtree Road, Atlanta, Georgia, Jupiter Project of the same Atlanta address as the Eckert employer at \$85,000 a year and a fraudulently obtained North Carolina state-issued identification in the Eckert stolen identity bearing the photograph of defendant COX.

(74) On or about April 13, 2004, defendants MATTHEW BEVAN COX and REBECCA MARIE HAUCK traveled from North Carolina to the Northern District of Georgia where they made a charge on defendant COX's fraudulently obtained David Freeman Chase MasterCard.

(75) On or about May 4, 2004, defendant REBECCA MARIE HAUCK traveled from the Northern District of Georgia to Tennessee where she fraudulently obtained a state-issued Tennessee drivers license in the stolen Michielle Vayomi Joseph identity using the stolen SSN of another person and returned to the Atlanta, Georgia area by May 7, 2004.

(76) On or about May 14, 2004, defendant MATTHEW BEVAN COX traveled from the Northern District of Georgia to North Carolina where he used the stolen Michael John Eckert identity, the 120 North Cedar Street address and his previous North Carolina state-issued Eckert identification card to fraudulently obtain a state-issued North Carolina drivers license in the stolen Eckert identity bearing the photograph of defendant COX.

(77) On or about May 15, 2004, defendant MATTHEW BEVAN COX opened a Bank of America account in the stolen Michael J. Eckert identity with the 301 South Tryon Street, Charlotte, North Carolina address, the SSN of another person and the fraudulent state-issued North Carolina drivers license in the stolen identity of Michael John Eckert bearing the photograph of defendant COX.

(78) On or about May 26, 2004, defendant MATTHEW BEVAN COX, using the stolen identity of Michael John Eckert, applied for a \$24,269.76 vehicle loan for the purchase of a 2004 Infiniti G35 and submitted false qualifying information, including the stolen Eckert borrower name, the SSN of another person, a fake Eckert employment and income, a current Eckert address of 120 North cedar Street and a fraudulent state-issued North Carolina drivers license in the stolen Eckert identity bearing the photograph of defendant COX.

(79) Between on or about May 11, 2004 and on or about June 8, 2004, defendant REBECCA MARIE HAUCK made seven cash

withdrawals totaling \$46,000 from her Northern District of Georgia account at United Americas Bank in the stolen Grace Hudson identity with each cash withdrawal in an amount less than \$10,000.

(80) Between on or about May 17, 2004 and on or about June 8, 2004, defendant MATTHEW BEVAN COX made 23 cash withdrawals totaling \$169,330 from his Northern District of Georgia accounts at United Americas Bank, SunTrust Bank and SouthTrust Bank in the David Freeman, Gerald Scott Cugno and Michael S. Shanahan stolen identities with each cash withdrawal in an amount less than \$10,000.

(81) Between on or about May 17, 2004 and on or about November 4, 2004, defendant MATTHEW BEVAN COX made 18 cash deposits totaling \$53,124 into his Michael J. Eckert Bank of America account, with each cash deposit in an amount less than \$10,000.

(82) Beginning on or about mid May 2004, defendants MATTHEW BEVAN COX and REBECCA MARIE HAUCK transported mortgage loan scheme proceeds from the Northern District of Georgia to North and South Carolina in amounts of \$5,000 or more.

(83) On or about June 25, 2004, defendant MATTHEW BEVAN COX rented a "mail drop" at The UPS Store, 10120 Two Notch Road, Columbia, South Carolina in the stolen identity of Gary Lee Sullivan, using the SSN of another person, an altered phone bill and a counterfeit Florida drivers licenses in the stolen Sullivan identity bearing photographs of defendants COX.

(84) On or about June 25, 2004, defendant MATTHEW BEVAN COX opened a savings account with a \$300 cash deposit at Bank of America and applied for a Visa credit card, using the stolen identity of Gary Lee Sullivan, the SSN of another person and the 10120 Two Notch Road, Columbia, South Carolina.

(85) On or about July 1, 2004, defendants MATTHEW BEVAN COX and REBECCA MARIE HAUCK traveled from South Carolina to the Northern District where they removed mortgage fraud loan proceeds by making purchases on the Bank of America debit card fraudulently obtained in the stolen Michael J. Eckert identity.

(86) On or about July 6, 2004, defendants MATTHEW BEVAN COX and REBECCA MARIE HAUCK traveled from the Northern District to Georgia Post Gateway Apartments in Charlotte, North Carolina where defendant HAUCK changed the lease from defendant COX's stolen Michael J. Eckert identity into her stolen Michielle V. Joseph identity, using the SSN of another person and her fraudulent state-issued Tennessee drivers license in the Joseph name bearing the photograph of defendant HAUCK.

(87) On or about August 5, 2004, defendant MATTHEW BEVAN COX fraudulently obtained a state-issued South Carolina identification card in the stolen identity of Gary Lee Sullivan bearing the photograph of defendant COX.

(88) On or about August 6, 2004, defendant MATTHEW BEVAN COX opened Carolina First Bank checking account in the stolen



Gary Lee Sullivan identity with the 10120 Two Notch Road, Columbia, South Carolina address, the SSN of another person and the fraudulent state-issued South Carolina identification card in the stolen identity of Gary Lee Sullivan bearing the photograph of defendant COX; and thereafter, in August 2004, made three cash deposits said account totaling \$12,300, with each cash deposit in an amount less than \$10,000.

(89) On or about August 9, 2004, defendant MATTHEW BEVAN COX opened an account at First Community Bank in the stolen Gary Lee Sullivan identity with the 10120 Two Notch Road, Columbia, South Carolina address, the SSN of another person and the fraudulent state-issued South Carolina identification card in the stolen identity of Gary Lee Sullivan bearing the photograph of defendant COX; and thereafter, between August 9 and November 1, 2004, made six cash deposits to said account totaling \$18,500, with each cash deposit in an amount less than \$10,000.

(90) On or about September 1, 2004, defendants MATTHEW BEVAN COX and REBECCA MARIE HAUCK rented an apartment at Cotton Mills, 520 West Fifth Street, Charlotte, North Carolina, using the stolen identities of Michael John Eckert and Michielle Joseph respectively, the SSNs of other persons, Eckert and Joseph earning statements from The Jupiter Project, a present address of 120 North Cedar Street, contact number 704-649-2208, a fraudulent state-issued North Carolina drivers license in the stolen Eckert

identity, bearing the photograph of defendant COX and a fraudulent state-issued Tennessee drivers license in the stolen Joseph identity, bearing the photograph of defendant HAUCK .

(91) On or about October 18, 2004, defendant MATTHEW BEVAN COX opened an account at Wachovia Bank in the stolen Gary Lee Sullivan identity with the 10120 Two Notch Road, Columbia, South Carolina address, the SSN of another person and \$1,000 initial cash deposit.

(92) On or about November 27, 2004, defendant REBECCA MARIE HAUCK, using the stolen identity of Michielle Robinson Joseph, applied for a \$30,684 vehicle loan for the purchase of a 2004 Infiniti FX35 SUV and submitted false qualifying information, including the stolen Joseph borrower name, the SSN of another person, a fake Joseph employment of Jupiter Research Associates at 120 North Cedar Street, Charlotte, North Carolina with annual income of \$72,000, a current Joseph address of 120 North Cedar Street, a reference of boyfriend Michael Eckert at 704-649-2208 and a fraudulent state-issued Tennessee drivers license in the stolen Joseph identity bearing the photograph of defendant HAUCK.

(93) On or about March 12, 2005, defendant REBECCA MARIE HAUCK opened a Wachovia Bank checking account in the stolen Michielle Joseph identity with the 520 West Fifth Street, Charlotte, North Carolina address, the SSN of another person and the deposit of a \$9,846.80 CarMax check payable to Michielle

Robinson Joseph, withdrawing \$9,800 in cash on or about March 21, 2005.

Acts related to 7211 Holloway Road, Columbia, South Carolina

(94) On or about August 20, 2004, defendant MATTHEW BEVAN COX used the stolen Gary L. Sullivan to obtain owner financing from true property owner Loren G. Hutchinson for the purchase of 7211 Holloway Road, Columbia, South Carolina, promising to pay Hutchinson \$110,000 in two years with both the \$112,000 security interest of Hutchinson's Union Federal Bank lender and Hutchinson's \$110,000 security interest to remain outstanding.

(95) On or about September 7, 2004, defendant MATTHEW BEVAN COX fraudulently eliminated the \$112,000 security interest of Union Federal Bank of Indianapolis, Hutchinson's mortgage lender, by filing with the Richland County South Carolina Register of Deeds a forged Satisfaction of Mortgage document on 7211 Holloway Road dated August 25, 2004, with the forged signatures of purported Union Federal Bank officers Ronn Pisaplia and Jarrod Gibson and the notation to mail the file-stamped copy of the satisfaction to Gary Sullivan at 10120 Two Notch Road, Columbia, South Carolina.

(96) On or about September 14, 2004, defendant MATTHEW BEVAN COX fraudulently eliminated the Hutchinson \$110,000 mortgage on 7211 Holloway Road by filing with the Richland County South Carolina Register of Deeds a false Satisfaction of Mortgage document dated September 13, 2004 over the forged signature of

Loren G. Hutchinson, with a notation that this satisfaction was prepared by Hutchinson and a file-stamped copy should be mailed to 10120 Two Notch Road, Columbia, South Carolina.

First Community Bank Loan

(97) On or about October 14, 2004, defendant MATTHEW BEVAN COX, using the stolen Gary L. Sullivan identity, applied with First Community Bank for a \$90,000 mortgage loan to be secured by 7211 Holloway Road, falsely represented that he owned this property "free and clear," provided a fake HUD1 Settlement Statement showing an August 20, 2004 cash purchase of Holloway Road by Sullivan for \$125,000, supplied a fake Sullivan Homeowners Policy Declaration purportedly issued by David White of Southern Insurance Company at 4840 Forrest Drive, Columbia, South Carolina and supplied other false qualifying information, including the stolen borrower name of Gary L. Sullivan, the stolen SSN of another person, a fake five-year Sullivan employer of Labor on Demand at 10120 Two Notch Road with monthly income of \$3,750 and a contact phone number of 803-609-3964.

(98) On or about October 29, 2004, defendant MATTHEW BEVAN COX, using the stolen Gary L. Sullivan identity, attended closing for the \$90,000 First Community Bank/Washington Mutual Bank (WAMU) mortgage loan, signed the HUD1 Settlement Statement and all closing documents as Sullivan and on or about November 3, 2004, received a loan proceeds check for \$87,678.64 payable to Gary L.

Sullivan.

(99) On or about November 3, 2004, defendant MATTHEW BEVAN COX deposited the Sullivan \$87,678.64 First Community loan proceeds check into his First Community Bank account opened in the stolen Gary L. Sullivan identity, receiving cash back of \$4,000.

(100) On or about December 15, 2004, defendant MATTHEW BEVAN COX fraudulently eliminated the First Community/WAMU \$90,000 mortgage on 7211 Holloway Road by filing with the Richland County South Carolina Register of Deeds a false Satisfaction of Mortgage document dated December 8, 2004, requesting a file-stamped copy of the satisfaction to be mailed to Gary L. Sullivan at 10120 Two Notch Road, Columbia, South Carolina.

Capital Trust Mortgage Loan

(101) On or about October 6, 2004, defendant MATTHEW BEVAN COX, using the stolen Gary L. Sullivan identity, applied with Capital Trust Mortgage for a \$87,500 mortgage loan to be secured by 7211 Holloway Road, falsely represented that he owned this property "free and clear," provided a fake HUD1 Settlement Statement showing an August 20, 2004 cash purchase of Holloway Road by Sullivan for \$125,000 and supplied other false qualifying information, including the stolen borrower name of Gary L. Sullivan, the stolen SSN of another person, a fake five-year Sullivan employer of Labor on Demand at 10120 Two Notch Road with monthly income of \$3,750 and a contact phone number of 803-609-3964.

(102) On or about November 5, 2004, defendant MATTHEW BEVAN COX, using the stolen Gary L. Sullivan identity, attended closing for the Capital Trust \$87,500 mortgage loan, signed the HUD1 Settlement Statement and all closing documents as Sullivan and received a loan proceeds check for payable to Gary L. Sullivan.

(103) On or about November 5, 2004, defendant MATTHEW BEVAN COX deposited the Sullivan \$69,409.50 Capital Trust loan proceeds check into his First Community Bank account opened in the stolen Gary L. Sullivan identity, receiving cash back of \$8,000.

(104) On or about November 15, 2004, defendant MATTHEW BEVAN COX wrote a \$30,000 check on his Gary L. Sullivan First Community Bank account, opened a savings account at Carolina First Bank in the stolen Sullivan identity and deposited the \$30,000 First Community check.

(105) Between on or about November 8, 2004 and on or about December 29, 2004, defendant MATTHEW BEVAN COX, using the stolen Gary L. Sullivan identity, made 11 cash withdrawals totaling \$56,650 from his First Community Bank account.

(106) On or about December 15, 2004, defendant MATTHEW BEVAN COX fraudulently eliminated the Capital Trust \$87,500 mortgage on 7211 Holloway Road by filing with the Richland County South Carolina Register of Deeds a false Satisfaction of Mortgage document dated December 7, 2004, requesting a file-stamped copy of the satisfaction to be mailed to 10120 Two Notch Road, Columbia,

South Carolina.

Fieldstone Mortgage Loan

(107) On or about December 9, 2004, defendant MATTHEW BEVAN COX, using the stolen Gary Lee Sullivan identity, opened a Bank of America account with the 10120 Two Notch Road, Columbia, South Carolina address, the SSN of another person and a fraudulently obtained state-issued identification card in the stolen identity of Gary Sullivan bearing the photograph of defendant COX.

(108) In or about January 2005, defendant MATTHEW BEVAN COX, using the stolen Gary L. Sullivan identity, applied with Fieldstone Mortgage for a \$112,000 mortgage loan to be secured by 7211 Holloway Road, falsely represented that he owned this property "free and clear" and provided other false qualifying information, including the stolen borrower name of Gary L. Sullivan, the stolen SSN of another person, a fake five-year Sullivan employer of Labor on Demand at 10120 Two Notch Road with monthly income of \$4,636.33 and a Sullivan contact phone number of 803-609-3964.

(109) On or about February 7, 2005, defendant MATTHEW BEVAN COX opened a Southern Funding Consortium, Inc. account at SouthTrust Bank, using the stolen Gary Lee Sullivan identity as President and authorized signor for Southern, the 10120 Two Notch Road, Columbia, South Carolina address, the SSN of another person and a fraudulently obtained state-issued South Carolina

identification card in the stolen identity of Gary Sullivan bearing the photograph of defendant COX.

(110) On or about February 10, 2005, defendant MATTHEW BEVAN COX, using the stolen Gary L. Sullivan identity, attended closing for the \$112,000 Fieldstone mortgage loan, signed the HUD1 Settlement Statement and all closing documents as Sullivan and received a \$106,782.68 loan proceeds check for payable to Gary L. Sullivan.

(111) On or about February 14, 2005, defendant MATTHEW BEVAN COX deposited the Sullivan \$106,782.68 Fieldstone loan proceeds check into his First Community Bank account opened in the stolen Gary L. Sullivan identity.

(112) On or about February 16, 2005, defendant MATTHEW BEVAN COX purchased four First Community cashiers checks, all in the amount of \$20,000 and payable to Gary L. Sullivan, from the proceeds of his First Community Bank account opened in the stolen Sullivan identity and deposited one such cashiers check into each of his Sullivan accounts at Wachovia Bank, Bank of America and Carolina First Bank and into his Southern Funding account at SouthTrust Bank.

Acts related to 105 Sandy Lake Road, Columbia, South Carolina

(113) On or about October 19, 2004, defendant MATTHEW BEVAN COX rented a "mail drop" at The UPS Store, 4840 Forest Drive, Columbia, South Carolina, using the stolen identity of Gary Lee



Sullivan, the SSN of another person, the company name of Southern Insurance and a fraudulent state-issued South Carolina identification card in the stolen Sullivan identity bearing photographs of defendants COX.

(114) On or about December 14, 2004, defendant MATTHEW BEVAN COX used the stolen Gary L. Sullivan identity to obtain owner financing from true property owners Bruce and Bridget Brown for the purchase of 105 Sandy Lake Road, Columbia, South Carolina, promising to pay the Browns \$201,000 in 18 months with both the \$170,000 security interest of Brown lender USAA Federal Savings Bank and the Browns' \$201,000 security interest in the property to remain outstanding until both were paid.

(115) On or about January 4, 2004, defendant MATTHEW BEVAN COX incorporated Southern Funding Consortium, Inc. with the South Carolina Secretary of State, listing the registered agent as Gary Lee Sullivan at 10120 Two Notch Road, Columbia, South Carolina.

(116) On or about January 10, 2005, defendants MATTHEW BEVAN COX and REBECCA MARIE HAUCK fraudulently eliminated the \$170,000 security interest of USAA Federal Savings Bank, the Browns' mortgage lender, by filing with the Richland County South Carolina Register of Deeds a forged Satisfaction of Mortgage document on 105 Sandy Lake Road dated December 17, 2004, with the notation to mail the file-stamped copy of the satisfaction to USAA

Federal Savings Bank at 10120 Two Notch Road address.

(117) On or about January 10, 2005, defendants MATTHEW BEVAN COX and REBECCA MARIE HAUCK fraudulently eliminated the \$201,000 Gary Sullivan owner financed mortgage payable to Bruce and Bridget Brown on 105 Sandy Lake Road by filing with the Richland County South Carolina Register of Deeds a false Satisfaction of Mortgage document dated January 6, 2005, notarized in Cobb County Georgia, with a file-stamped copy this satisfaction to be mailed to Gary L. Sullivan at 10120 Two Notch Road, Columbia, South Carolina.

(118) On or about January 10, 2005, defendants MATTHEW BEVAN COX and REBECCA MARIE HAUCK caused a false Mortgage document dated December 14, 2004 purportedly securing a bogus \$164,000 loan by Southern Funding Consortium, Inc. to Gary L. Sullivan for the purchase of 105 Sandy Lake Road to be filed with the Richland County South Carolina Register of Deeds with a file-stamped copy this mortgage to be mailed to Southern Funding Consortium at 10120 Two Notch Road, Columbia, South Carolina.

(119) On or about January 12, 2005, defendant MATTHEW BEVAN COX opened a Southern Funding Consortium, Inc. account at First Citizens Bank, using the stolen Gary Lee Sullivan identity as authorized signor for Southern, the 10120 Two Notch Road, Columbia, South Carolina address and the SSN of another person.

(120) On or about February 7, 2005, defendant MATTHEW BEVAN COX opened a Southern Funding Consortium, Inc. account at

Regions Bank, using the stolen Gary Lee Sullivan identity as authorized signor for Southern, the 10120 Two Notch Road, Columbia, South Carolina address and the SSN of another person.

(121) On or about February 7, 2005, in Columbia, South Carolina, defendant MATTHEW BEVAN COX telephoned the true Sandy Lake owner in Georgia to discuss correction of the property description in order to facilitate defendants COX and REBECCA MARIE HAUCK obtaining multiple additional loans on the property.

First Community Bank Loan

(122) On or about January 12, 2005, defendant MATTHEW BEVAN COX, using the stolen Gary L. Sullivan identity, applied with First Community Bank for a \$179,200 mortgage loan to be secured by 105 Sandy Lake Road, falsely representing the stolen borrower name of Gary L. Sullivan, the stolen SSN of another person, a fake five-year Sullivan employer of Labor on Demand at 10120 Two Notch Road with monthly income of \$3,750 and a Sullivan contact phone number of 803-609-3964.

(123) On or about February 8, 2005, defendant MATTHEW BEVAN COX, using the stolen Gary L. Sullivan identity, attended closing for the \$179,200 First Community Bank mortgage loan on 105 Sandy Lake Road, signed the HUD1 Settlement Statement and all closing documents as Sullivan and caused a \$163,872.30 loan proceeds check to be issued to Southern Funding Consortium by falsely representing that he owed lender Southern Funding for the

mortgage loan he purportedly used to purchase this property on December 14, 2004.

(124) On or about February 18, 2005, defendant MATTHEW BEVAN COX deposited the Southern Funding \$163,872.30 First Community loan proceeds check into his First Citizens Bank account opened in the name of Southern Funding with Gary L. Sullivan as authorized signor.

SunTrust Bank Loan

(125) In or about January 2005, defendant MATTHEW BEVAN COX, using the stolen Gary L. Sullivan identity, applied with SunTrust Bank for a \$168,000 mortgage loan to be secured by 105 Sandy Lake Road, falsely representing the stolen borrower name of Gary L. Sullivan, the stolen SSN of another person and a fake five-year Sullivan employer of Labor on Demand at 10120 Two Notch Road.

(126) On or about February 10, 2005, defendant MATTHEW BEVAN COX, using the stolen Gary L. Sullivan identity, attended closing for the \$168,000 SunTrust Bank mortgage loan on 105 Sandy Lake Road, signed the HUD1 Settlement Statement and all closing documents as Sullivan and caused a \$164,515.94 loan proceeds check to be issued to Southern Funding Consortium by falsely representing that he owed lender Southern Funding for the mortgage loan he purportedly used to purchase this property.

(127) On or about February 16, 2005, defendant MATTHEW BEVAN COX deposited the Southern Funding \$164,515.74 SunTrust loan

proceeds check into his First Citizens Bank account opened in the name of Southern Funding with Gary L. Sullivan as authorized signor.

(128) On or about March 1, 2005, defendant MATTHEW BEVAN COX, using the stolen Gary L. Sullivan identity, made two cash withdrawals totaling \$142,000 from his Southern Funding account at First Citizens Bank.

Wachovia Bank Loan

(129) In or about January 27, 2005, defendant MATTHEW BEVAN COX, using the stolen Gary L. Sullivan identity, applied with Wachovia Bank for a \$169,000 mortgage loan to be secured by 105 Sandy Lake Road, falsely representing the stolen Sullivan borrower name, the stolen SSN of another person and a fake five-year Sullivan employer of Labor on Demand at 10120 Two Notch Road with a monthly income of \$8,318.76.

(130) On or about February 4, 2005, defendant REBECCA MARIE HAUCK, using the stolen Donna Martin identity, pretended to be the Labor on Demand Office Manager and falsely verified the employment of Gary L. Sullivan as a Labor on Demand Manager for the Wachovia loan.

(131) On or about January 27, 2005, defendant REBECCA MARIE HAUCK prepared and caused to be submitted fraudulent leases for two properties with mortgage loans in the name of Gary Sullivan, said leases purporting to show an additional \$2,000 a

month rental income in support of the Wachovia loan for Sandy Lake then being sought in the Sullivan identity by falsely reflecting such rental income from tenants Marlo Snyder and Michael L. Moon.

(132) On or about February 11, 2005, defendant MATTHEW BEVAN COX, using the stolen Gary L. Sullivan identity, attended closing for the \$169,000 Wachovia Bank mortgage loan on 105 Sandy Lake Road, provided a bogus Sullivan Homeowners Policy Declaration purportedly issued by David White of Southern Insurance Company at 4840 Forrest Drive, Columbia, South Carolina, signed the HUD1 Settlement Statement and all closing documents as Sullivan and caused a \$163,461.60 loan proceeds check to be issued to Southern Funding Consortium by falsely representing that he owned lender Southern Funding for the mortgage loan he purportedly used to purchase this property.

(133) On or about February 18, 2005, defendant MATTHEW BEVAN COX deposited the Southern Funding \$163,461.60 Wachovia loan proceeds check into his SouthTrust Bank account opened in the name of Southern Funding with Gary L. Sullivan as authorized signor.

(134) On or about February 25, 2005, defendant MATTHEW BEVAN COX purchased five SouthTrust cashiers checks, all in the amount of \$27,000 and payable to Gary L. Sullivan, from the proceeds of his SouthTrust Bank Southern Funding account and deposited one such cashiers check into each of his Sullivan accounts at Bank of America and Carolina First Bank and into his

Southern Funding accounts at Regions Bank, First Citizens Bank and SouthTrust Bank.

Fieldstone Mortgage

(135) On or about February 10, 2005, defendant MATTHEW BEVAN COX, using the stolen Gary L. Sullivan identity, applied with Fieldstone Mortgage for a \$170,618 loan to be secured by 105 Sandy Lake Road, falsely representing the stolen Sullivan borrower name, the stolen SSN of another person, a fake five-year Sullivan employer of Labor on Demand at 10120 Two Notch Road with a monthly income of \$4,582.33 plus \$2,000 a month in rental income and a bogus Sullivan Homeowners Policy Declaration purportedly issued by David White of Southern Insurance Company at 4840 Forrest Drive, Columbia, South Carolina.

(136) On or about February 11, 2005, defendant MATTHEW BEVAN COX, using the stolen Gary L. Sullivan identity, attended closing for the \$170,618 Fieldstone Mortgage loan on 105 Sandy Lake Road, signed the HUD1 Settlement Statement and all closing documents as Sullivan and caused a \$163,672.30 loan proceeds check to be issued on February 16, 2005 to Southern Funding Consortium by falsely representing that he owed lender Southern Funding for the mortgage loan he purportedly used to purchase this property and providing a fake supporting HUD1 Settlement Statement.

(137) On or about February 16, 2005, defendant MATTHEW BEVAN COX deposited the Southern Funding \$163,670.30 Fieldstone

loan proceeds check into his Regions Bank account opened in the name of Southern Funding with Gary L. Sullivan as authorized signor.

(138) On or about March 10, 2005, defendants MATTHEW BEVAN COX and REBECCA MARIE HAUCK traveled from South Carolina to the Northern District of Georgia where they removed mortgage loan fraud proceeds through March 10th and 14th Bank of America debit card purchases on the fraudulently obtained Michael J. Eckert card.

Carolina First Bank Attempted Loan

(139) On or about February 9, 2005, defendant MATTHEW BEVAN COX, using the stolen Gary L. Sullivan identity, applied with BB&T Bank for a \$170,000 loan to be secured by 105 Sandy Lake Road, falsely representing the stolen Sullivan borrower name, the stolen SSN of another person and a fake five-year Sullivan employer of Labor on Demand at 10120 Two Notch Road with a monthly income of \$7,083.

(140) In or about February 2005, defendant MATTHEW BEVAN COX submitted a fake payoff amount of \$164,000 purportedly due Southern Funding Consortium, Inc. from the BB&T loan proceeds to satisfy a Southern mortgage lien, supported by a fake HUD1 Settlement Statement purportedly reflecting Southern's financing of the December 14, 2004 Gary L. Sullivan purchase of 105 Sandy Lake.

BB&T Bank Attempted Loan

(141) On or about February 10, 2005, defendant MATTHEW



BEVAN COX, using the stolen Gary L. Sullivan identity, applied with BB&T Bank for a \$164,000 loan to be secured by 105 Sandy Lake Road, falsely representing the stolen Sullivan borrower name, the stolen SSN of another person and a fake five-year Sullivan employer of Labor on Demand at 10120 Two Notch Road with a monthly income of \$7,083.

(142) On or about February 22, 2005, defendant REBECCA MARIE HAUCK, using the stolen Donna Martin identity, pretended to be the Labor on Demand Human Resources Director and falsely verified the employment of Gary L. Sullivan as Site Manager for Labor on Demand for the BB&T loan.

(143) In or about February, 2005, defendant REBECCA MARIE HAUCK prepared a lease agreement for 7211 Holloway Road, a property with mortgage loans in the name of Gary Sullivan, falsely reflecting the property to have been rented to tenant Michael L. Moon at \$900 a month since December 1, 2004.

#### Mortgage Loan Proceeds

(144) On or about March 10, 2005, in the Northern District of Georgia, defendants MATTHEW BEVAN COX and REBECCA MARIE HAUCK obtained mortgage loan scheme proceeds from the Michael Eckert Bank of America account by using the Eckert debit card to make an ATM withdrawal in Commerce, Georgia.

(145) On or about March 14, 2005, in the Northern District of Georgia, defendants MATTHEW BEVAN COX and REBECCA MARIE

HAUCK obtained mortgage loan scheme proceeds from the Michael Eckert Bank of America account by using the Eckert debit card to make a purchase in Commerce, Georgia.

(146) Counts Two through Forty-Two of this Indictment are incorporated herein by reference as additional overt acts in furtherance of this conspiracy.

All in violation of Title 18, United States Code, Section 371.

COUNTS TWO THROUGH SEVEN

Wire Fraud  
18 U.S.C. 1343

4. The Grand Jury realleges and incorporates herein by reference the allegations contained in Count One of this Indictment.

5. From in or about November 2003 and continuing to on or about September 27, 2005, in the Northern District of Georgia and elsewhere, defendants MATTHEW BEVAN COX and REBECCA MARIE HAUCK, aided and abetted by each other and others, knowingly and wilfully devised and intended to devise a scheme and artifice to defraud real estate owners, title companies, mortgage insurers, mortgage lenders and other lenders and to obtain money and property by means of materially false and fraudulent pretenses, representations and promises.

6. On or about the below listed dates, defendants COX and HAUCK, for the purpose of executing and attempting to execute the aforesaid scheme and artifice to defraud, caused to be transmitted

in interstate commerce, by means of a wire communication, certain signs, signals and sounds between the Northern District of Georgia (NDGA) and the below listed out of state location, as follows:

Ct	Date	Out of State Location	Wire Communication
2	2/9/04	California	Wire transfer of \$15,039 in Honda Element SUV loan proceeds obtained in stolen Gerald Scott Cugno identity
3	2/23/04	Florida	Fax transmission of false qualifying information to Sterling Trust for attempted Proctor Street mortgage loan in stolen Theresa Knight identity
4	3/2/04	Florida	Fax transmission of pre-closing documents signed "T. Knight" to Prime Credit for Proctor Street mortgage loan in stolen Theresa Knight identity
5	5/7/04	Florida	Wire transfer of \$5,850 portion of Yale loan proceeds to NDGA closing attorney for Keyingham Way mortgage loan in stolen Michael Shanahan identity
6	5/10/04	New York	Wire transfer of \$36,000 portion of ThoughtForce loan proceeds to NDGA closing attorney for Keyingham Way mortgage loan in stolen Michael Shanahan identity
7	5/12/04	New York	Wire transfer of \$17,000 portion of Sam Dobrow loan proceeds to NDGA closing attorney for Keyingham Way mortgage loan in stolen Michael Shanahan identity

All in violation of Title 18, United States Code, Sections 1343 and 2.

COUNT EIGHT  
Bank Fraud  
18 U.S.C. 1344

7. The Grand Jury realleges and incorporates herein by reference the allegations contained in Count One of this Indictment.

8. From in or about November 2003 and continuing though on or about September 27, 2005, in the Northern District of Georgia and elsewhere, defendants MATTHEW BEVAN COX and REBECCA MARIE HAUCK, aided and abetted by each other, knowingly and wilfully executed and attempted to execute a scheme and artifice to defraud insured financial institutions, including Bank of America.

9. On or about December 31, 2003 and on or about January 16, 2004, in the Northern District of Georgia, defendants MATTHEW BEVAN COX and REBECCA MARIE HAUCK, aided and abetted by each other, did knowingly execute and attempt to execute a scheme and artifice to defraud Bank of America (BOA), a financial institution the deposits of which were then insured by the Federal Deposit Insurance Corporation, by means of materially false and fraudulent pretenses, representations and promises, in that the defendants fraudulently eliminated the outstanding BOA first and second mortgage liens totaling \$173,349 on the 3105 Keyingham Way, Alpharetta, Georgia property, and on or about May 6, 7 and 12, 2004 encumbered the property with three additional mortgage loans totaling \$329,000.

All in violation of Title 18, United States Code, Sections 1344 and 2.

COUNT NINE  
Mail Fraud  
18 U.S.C. 1341

10. The Grand Jury realleges and incorporates herein by reference the allegations contained in Count One of this Indictment.

11. From in or about November 2003 and continuing through on or about September 27, 2005, in the Northern District of Georgia and elsewhere, defendants MATTHEW BEVAN COX and REBECCA MARIE HAUCK, aided and abetted by each other, knowingly and wilfully devised and intended to devise a scheme and artifice to defraud real estate owners, title insurers, mortgage insurers, mortgage lenders and other lenders by making and causing to be made materially false and fraudulent representations, pretenses and promises to obtain money and property.

12. On or about February 3, 2004, defendants COX and HAUCK, for the purpose of executing and attempting to execute the aforesaid scheme and artifice to defraud, caused the Postal Service or other interstate carriers to be used by causing to be mailed from the Northern District of Georgia a letter to The UPS Store at 1414 Gold Springs Road in Anniston, Alabama regarding the "mail drop" previously obtained in the stolen Grace Hudson identity, enclosing a "mail drop" application in the stolen identity of Gerald Scott Cugno with a fraudulent Alabama state-issued temporary drivers license in the stolen Cugno identity and a Cugno Progressive Insurance Card for the 2003 Honda Element SUV, all documents bearing

Cobb County notary seals, said "mail drop" address used to fraudulently obtain a Cugno state-issued Alabama permanent drivers license on February 9, 2004 as necessary identification to open a Cugno bank account on May 13, 2004 for receipt of mortgage loan fraud proceeds.

All in violation of Title 18, United States Code, Sections 1341 and 2.

COUNTS TEN THROUGH THIRTEEN  
Interstate Transportation of Fraud Proceeds  
18 U.S.C. 2314

13. The Grand Jury realleges and incorporates herein by reference the allegations contained in Count One of this Indictment.

14. On or about the below listed dates, defendants MATTHEW BEVAN COX and REBECCA MARIE HAUCK, aided and abetted by each other, transported, transmitted and transferred in interstate commerce between the Northern District of Georgia and the following out of state locations, goods, wares, merchandise, securities and money having a value of \$5,000 or more, knowing the same to have been stolen, converted and taken by fraud:

Ct	Date	Out of State Location	Items Transported
10	3/4/04	Florida	Two cashiers checks payable to David Freeman in the amounts of \$15,000 & \$13,000 & two closing checks payable to Grace Hudson in the amounts of \$10,000 & \$10,004.50
11	5/17/04	North Carolina	\$8,000 cash

Ct	Date	Out of State Location	Items Transported
12	late 5/04	North Carolina	\$56,680 cash
13	7/04	South Carolina	\$112,000 cash

All in violation of Title 18, United States Code, Sections 2314 and 2.

COUNTS FOURTEEN THROUGH THIRTY-TWO  
Money Laundering  
18 U.S.C. 1957

15. The Grand Jury realleges and incorporates herein by reference the facts stated in Counts 1 through 13 and 33 through 42 of this Indictment.

16. On or about the below listed dates, in the Northern District of Georgia, defendants MATTHEW BEVAN COX and REBECCA MARIE HAUCK, aided and abetted by each other, did knowingly engage in, and attempt to engage in the specified monetary transactions listed below by, through and to a financial institution, affecting interstate and foreign commerce, involving criminally derived property of a value greater than \$10,000, as specified below, such property having been derived from a specified unlawful activity, to wit, identity theft and fraud, mail fraud, wire fraud and bank fraud as further described in Counts One through Thirteen and Counts Thirty-Three through Forty-Two of this Indictment:

Ct	Date	Monetary Transaction	Related Property/Loan
14	3/5/04	Deposited \$15,000 People's First cashiers check payable to David Freeman into United Americas Bank Freeman account & received \$1,000 cash	1537 Proctor/ Prime Credit
15	3/8/04	Deposited People's First \$10,004.50 closing check payable to Grace Hudson into United Americas Bank Hudson account	1537 Proctor/ Prime Credit
16	3/11/04	Deposited \$13,000 People's First cashiers check payable to David Freeman into United Americas Bank Freeman account	1537 Proctor/ Prime Credit
17	3/15/04	Purchased \$11,545 cashiers check from proceeds of United Americas Bank Freeman account payable to The Swan Center for Plastic Surgery	1537 Proctor/ Prime Credit
18	5/6/04	Cashed \$97,955.49 SunTrust closing check payable to Michael Shanahan at SunTrust Bank, received \$8,000 cash & purchased three cashiers checks: \$61,875 payable to G. Scott Cugno; \$17,955.49 payable to David Freeman; \$10,125 payable to Grace Hudson	3105 Keyingham/ Fieldstone Investments
19	5/7/04	Cashed \$61,875 SunTrust cashiers check payable to G. Scott Cugno at SunTrust Bank, received \$8,500 in cash & purchased \$53,367 cashiers check payable to G. Scott Cugno	3105 Keyingham/ Fieldstone Investments
20	5/7/04	Deposited \$17,955.49 SunTrust cashiers check payable to David Freeman into United Americas Bank Freeman account	3105 Keyingham/ Fieldstone Investments
21	5/7/04	Deposited \$10,125 SunTrust cashiers check payable to Grace Hudson into United Americas Bank Hudson account	3105 Keyingham/ Fieldstone Investments



Ct	Date	Monetary Transaction	Related Property/Loan
22	5/10/04	Cashed SunTrust \$53,375 cashiers check payable to G. Scott Cugno at SunTrust Bank, received \$8,516 in cash & purchased \$44,858 cashiers check payable to G. Scott Cugno	3105 Keyingham/ Fieldstone Investments
23	5/14/04	Deposited \$44,858 SunTrust cashiers check payable to G. Scott Cugno into SunTrust Cugno account	3105 Keyingham/ Fieldstone Investments
24	5/7/04	Cashed \$102,905.95 closing check at Charter Bank, received \$8,470 cash & purchased three cashiers checks: \$74,595.95 payable to Gerald S. Cugno; \$8,600 payable to David Freeman; \$11,210 payable to Grace Hudson	3105 Keyingham/ Yale Mortgage
25	5/10/04	Deposited \$11,210 Charter cashiers check payable to Grace Hudson into United Americas Bank Hudson account	3105 Keyingham/ Yale Mortgage
26	5/10/04	Cashed \$74,595.95 Charter cashiers check payable to Gerald S. Cugno at Charter Bank, received \$8,470 cash & purchased three cashiers checks: \$29,000 payable to Gerald S. Cugno; \$21,000 payable to David Freeman; \$16,950.95 payable to Grace Hudson	3105 Keyingham/ Yale Mortgage
27	5/11/04	Cashed \$29,000 Charter cashiers check payable to Gerald S. Cugno at Charter Bank	3105 Keyingham/ Yale Mortgage
28	5/11/04	Deposited \$21,000 Charter cashiers check payable to David Freeman into United Americas Bank Freeman account & received \$9,000 cash; deposited \$16,095 Charter cashiers check payable to Grace Hudson into United Americas Bank Hudson account	3105 Keyingham/ Yale Mortgage
29	5/13/04	Cashed \$98,755.20 closing check payable to Michael Shanahan at SouthTrust Bank & purchased \$98,755.20 cashiers check	3105 Keyingham/ ThoughtForce/ Dobrow/RE Sol

Ct	Date	Monetary Transaction	Related Property/Loan
30	5/21/04	Cashed \$98,755.20 SouthTrust cashiers check payable to Michael Shanahan at SouthTrust Bank, received \$5,000 cash, purchased \$78,755.20 cashiers check payable to Michael Shanahan & deposited \$15,000 into the SouthTrust Bank Shanahan account	3105 Keyingham/ ThoughtForce/ Dobrow/RE Sol
31	5/26/04	Deposited \$78,755.20 SouthTrust cashiers check payable to Michael S. Shanahan into SouthTrust Bank Shanahan account & received \$7,500 cash	3105 Keyingham/ ThoughtForce/ Dobrow/RE Sol
32	5/28/04	Withdrew \$18,016 from Shanahan SouthTrust Bank account & purchased two cashiers checks payable to David Freeman & Grace Hudson each in amount of \$9,000	3105 Keyingham/ ThoughtForce/ Dobrow/RE Sol

All in violation of Title 18, United States Code, Sections 1957 and 2.

COUNTS THIRTY-THREE THROUGH FORTY-TWO  
Stolen Identities  
18 U.S.C. 1028(a)(7)

11. The Grand Jury realleges and incorporates herein by reference the allegations contained in Counts One through Thirty-Two of this Indictment.

12. Between in or about November 2003 and on or about September 27, 2005, in the Northern District of Georgia and elsewhere, defendants MATTHEW BEVAN COX and REBECCA MARIE HAUCK, aided and abetted by each other, knowingly and without lawful authority caused to be transferred and used, and attempt to do so, means of identification of another person with intent to commit and

aid and abet in the commission of any unlawful activity, including federal felony offenses indictable under Title 18, United States Code, Sections 1341, 1343, 1344, 2314 and 1957, being mail fraud, wire fraud, bank fraud, interstate transportation of fraud proceeds and money laundering as further described in Counts One through Thirty-Two of this Indictment, and as the result of such transfer and use the defendants obtained things of value aggregating more than \$1,000 in a one year period, including over \$1.4 million in mortgage and vehicle loan proceeds between in or about March 2004 and in or about February 2005:

Ct	Means of Identification	Transfer and Use
33	Maxwell Price name & SSN of a minor child	T-Mobile phone # 404-944-0150 & apartment at 250 10th St
34	Grace Hudson name & SSN of a minor child	Counterfeit FL identification card, apartment at 250 10th St, 3105 Keyingham Way property rental, United Americas Bank account, Bank of America Visa credit card, Chase MasterCard credit card, BellSouth phone # 678-240-0611, cashiers checks & proceeds thereof totaling \$57,435.45
35	David Freeman name & SSN of a minor child	"Mail drop" at 3600 Dallas Hwy, counterfeit FL identification card, Virgin Mobile phone # 678-570-3416, mortgage loan for 3826 Glenlake Dr, "virtual office" at 1170 Peachtree St, "mail drop" at 1414 Golden Springs Rd, rental of 1537 Proctor St property, United Americas Bank account, United Americas Bank Visa credit card, Chase MasterCard credit card, cashiers checks & proceeds thereof totaling \$77,555.49

Ct	Means of Identification	Transfer and Use
36	Gerald Scott Cugno name, Cugno SSN & SSN of a minor child	State-issued AL drivers license, \$16,267 Honda Element vehicle loan, "mail drop" at 1414 Gold Springs Rd, SunTrust Bank account, cashiers checks & proceeds thereof totaling \$263,696.95
37	Michael S. Shanahan name & SSN of a minor child	Counterfeit FL drivers license, First Premier Bank MasterCard, cancellation of Bank of America mortgages on 3105 Keyingham Way, "mail drop" at 10800 Alphareta Hwy, three mortgage loans on 3105 Keyingham Way totaling \$329,000, SouthTrust Bank account, cashiers checks & proceeds thereof totaling \$177,510.40
38	Theresa A. Knight name & SSN of a minor child	Counterfeit FL identification card, "mail drop" at 12850 Hwy 9, cancellation of Countrywide mortgage on 1537 Proctor St, \$53,000 mortgage loan on 1537 Proctor St
39	Michael J. Eckert name, Eckert SSN & SSN of a minor child	Counterfeit FL concealed weapon license, state-issued NC identification card & drivers license, "mail drop" at 2221 Peachtree Rd, apartment at 120 Cedar St, \$24,269.76 Infiniti G35 vehicle loan, Bank of America account
40	Michielle Joseph name, Joseph SSN & SSN of a minor child	State-issued TN drivers license, apartment 120 Cedar St, \$30,684 Infiniti FX 35 vehicle loan, Wachovia Bank & Bank of America accounts
41	Donna A. Martin name & SSN of another person	State-issued NC identification card, "mail drop" at 301 S Tryon St, fake employer of mortgage loan borrower

Ct	Means of Identification	Transfer and Use
42	Gary L. Sullivan name & Sullivan SSN	Counterfeit FL drivers license, state-issued SC identification card, "mail drops" at 10120 Two Notch Rd & 4840 Forrest Dr, cancellation of six mortgage loans on 7211 Holloway Rd & 105 Sandy Lake Rd properties, seven new mortgage loans totaling \$976,318 on said properties, a fake mortgage on Sandy Lake Rd, accounts at Carolina Frist, First Community, Bank of America, First Citizens, Regions, SouthTrust & Wachovia Banks, Southern Funding Consortium incorporation, cashiers checks & proceeds thereof totaling at least \$215,000

All in violation of Title 18, United States Code, Section 1028(a)(7).

FORFEITURE PROVISION

13. Upon conviction of one or more of the offenses alleged in Counts One through Forty-Two of this Indictment, defendants MATTHEW BEVAN COX and REBECCA MARIE HAUCK shall forfeit to the United States pursuant to 18 U.S.C. §§ 981(a)(1)(C), 982(a)(2), and 28 U.S.C. § 2461(c) any property, real or personal, constituting or derived from proceeds obtained directly or indirectly as a result of the said violations, including but not limited to:

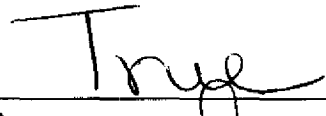
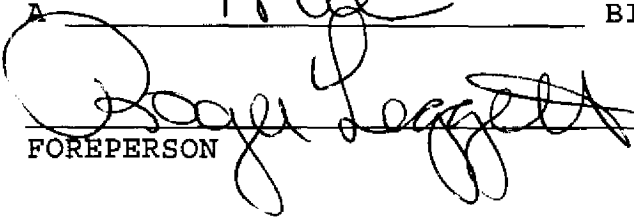
- a. \$168,957.75 in Regions Bank account number 3904054083 held in the name of Southern Funding Consortium, Inc. and/or Gary Sullivan;
- b. \$1,301.14 in Bank of America account number 004685894051 held in the name of Gary L. Sullivan;

- c. \$35,363.26 in Bank of America account number 000782323319 held in the name of Gary L. Sullivan;
- d. \$2,575.27 in Bank of America account number 000650669354 held in the name of Michael J. Eckert;
- e. \$28,850.19 in Carolina First Bank account number 8102015834 held in the name of Gary Sullivan;
- f. \$1,763.97 in Carolina First Bank account number 2101092048 held in the name of Gary Sullivan; and
- g. \$244.25 in First Community Bank account number 2105292 held in the name of Gary Lee Sullivan;
- h. \$1,698.97 in SouthTrust Bank account number 2-746-430 held in the name of Michael Shanahan.

14. If, as a result of any act or omission of the defendant, any property subject to forfeiture:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- 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 which cannot be subdivided without difficulty;

the United States intends, pursuant Title 18, United States Code, Section 982 (b) and 21 United States Code, Section 853(p), to seek forfeiture of any other property of said defendant up to the value of the forfeitable property.

  
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BILL  
  
\_\_\_\_\_  
FOREPERSON

DAVID E. NAHMIAS  
UNITED STATES ATTORNEY



GALE MCKENZIE  
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