

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF INDIANA  
HAMMOND DIVISION

**FILED**

DEC 20 2007 *MLC*

At  
STEPHEN R. LUDWIG, Clerk  
U.S. DISTRICT COURT  
NORTHERN DISTRICT OF INDIANA

UNITED STATES OF AMERICA )

v. )

TAMEKA L. BRYANT )  
aka Tameka Clark )

CAUSE NO. **2:07CR194**

18 USC § 1341 (mail fraud)  
18 USC § 1343 (wire fraud)  
42 USC § 408(a)(7)(B) (misuse of a  
Social Security number)

**INDICTMENT**

THE GRAND JURY CHARGES:

At all times material to these charges:

**DEFENDANT**

1. TAMEKA L. BRYANT (BRYANT) was born on September 20, 1972, and issued Social Security number xxx-xx-5612. Since at least the year 2000, BRYANT used Social Security number xxx-xx-4721, which was issued to another person.

**UNINDICTED CO-CONSPIRATOR**

2. JAMES P. CLARK (Clark) was born on May 8, 1961, and issued Social Security number xxx-xx-5518. Since at least 2000, Clark used the name James Derico and his son's Social Security number, xxx-xx-9806.

**BACKGROUND**

3. On or about January 7, 2003, BRYANT and Clark were married in Las Vegas, Nevada with BRYANT providing her real Social Security number and Clark using the name James Patrice Clark on the marriage application.

4. On or about February 28, 2003, BRYANT obtained an Indiana identification card in the name of Tameka L. Clark.

5. On or about October 23, 2003, BRYANT renewed her Illinois drivers license in the name of Tameka Bryant using Social Security number xxx-xx-4721.

6. On or about December 18, 2004, BRYANT and Clark were again married in Las Vegas, Nevada with BRYANT providing Social Security number xxx-xx-4721 and Clark using the name James Patrice Derico on the marriage application.

7. Guaranteed Mortgage and Challenge Mortgage were mortgage brokerage companies operating from the same address in Merrillville, Indiana. BRYANT operated and managed both businesses which assisted borrowers in preparing loan packages including applications, supporting financial documents and appraisals for submission to lending companies for the purchase and refinance of real estate properties.

8. Argent Mortgage Company (Argent), Long Beach Mortgage Company (Long Beach), Decision One Mortgage Company (Decision One), First Banc, Freemont Investment and Loan (Freemont), Specialty Mortgage, Finance America, First Franklin Financial Corporation (First Franklin), Resmae Mortgage Corporation (Resmae), Accredited Home Lenders (Accredited), and Global Lending Group, (Global) were businesses involved in providing loans related to the purchase and refinance of real estate property.

9. Indiana Title Network (Indiana Title), Ticor Title Insurance (Ticor Title), Community Title Company (Community Title), and Maximilian Title were businesses involved in closings for the sale and purchase of real estate property.

## **Scheme to Defraud and Obtain Money and Property**

10. It was part of the scheme to defraud that BRYANT, Clark and others submitted and caused to be submitted loan applications containing false statements for the purchase and refinance of real estate property, including statements: (a) lying about an applicant's true identity, (b) providing a false Social Security number, (c) exaggerating assets, (d) failing to disclose financial liabilities, (e) not revealing the real source of money used for down payments, and (f) claiming an applicant intended to occupy a property as a primary residence.

11. It was further part of the scheme that BRYANT, Clark and others created and caused to be created fake documents, including W-2 Forms, pay stubs, employment records, verifications for bank deposits and verifications of rent as a means to make applicants more creditworthy to lending companies.

12. It was further part of the scheme that BRYANT, Clark and others submitted and caused to be submitted false and fraudulent financial documents as part of loan packages submitted to lending companies.

13. It was further part of the scheme that BRYANT provided funds to loan applicants for either deposit into a loan applicant's bank account or for payment of closing fees to make the applicant appear more creditworthy.

14. Based on the false and fraudulent loan packages, lending companies approved loans and transmitted funds via wire transfer to title companies for closings on properties.

15. It was further part of the scheme that BRYANT directed closing agents to transmit portions of the loan proceeds to either Clark or bank accounts BRYANT controlled.

16. It was further part of the scheme that between on or about January 16, 2004, and

November 15, 2004, BRYANT, Clark and others used Challenge and Guaranteed to apply for and obtain loans to refinance and purchase the following real estate properties:

<u>Closing Date</u>	<u>Location</u>	<u>Lending Company</u>	<u>Title Company</u>
01/2004	2369 Wabash Avenue Gary, Indiana	First Banc	Maximilian
02/03/2004	20531 Tyler Drive Lynwood, Illinois	Freemont	Chicago Title
03/25/2004	3821 Delaware Street Gary, Indiana	Long Beach	Maximilian
03/25/2004	759 Tennessee Street Gary, Indiana	Long Beach	Maximilian
03/25/2004	2322 Wisconsin Street Gary, Indiana	Long Beach	Maximilian
09/21/2004	5522 W. 9 <sup>th</sup> Avenue Gary, Indiana	Argent	Indiana Title
11/15/2004	3640 Delaware Street Gary, Indiana	Argent	Indiana Title
11/23/2004	3636 Massachusetts Street Gary, Indiana	Argent	Indiana Title
11/23/2004	820 Becker Street Hammond, Indiana	Argent	Indiana Title

17. It was further part of the scheme that between on or about November 1, 2004, and January 27, 2005, BRYANT, Person 1 and others used Challenge and Guaranteed to apply for and obtain loans to refinance and purchase the following real estate properties:

11/05/2004	4312 Madison Gary, Indiana	Argent	Indiana Title
11/05/2004	3943 Washington Gary, Indiana	Decision One	Ticor Title

11/12/2004	2516 Fillmore Gary, Indiana	Argent	Indiana Title
11/12/2004	3953 Washington Gary, Indiana	Decision One	Indiana Title
11/22/2004	3732 Pennsylvania Gary, Indiana	Argent	Community Title
1/27/2005	4120 Adams Gary, Indiana	Long Beach	Indiana Title
1/27/2005	957 Lane Gary, Indiana	Long Beach	Indiana Title
1/27/2005	3907 Monroe Gary, Indiana	Long Beach	Indiana Title
1/27/2005	4377 Monroe Gary, Indiana	Long Beach	Indiana Title
1/27/2005	4057 Rhode Island Gary, Indiana	Long Beach	Indiana Title

18. It was further part of the scheme that between on or about June 1, 2005, and August 30, 2005, BRYANT, Person 2 and others used Challenge and Guaranteed to apply for and obtain loans to refinance and purchase the following real estate properties:

06/17/2005	447 King Gary, Indiana	Specialty Mortgage	Chicago Title
06/17/2005	1120 Whitcomb Gary, Indiana	Finance America	Chicago Title
06/30/2005	3636 Massachusetts Gary, Indiana	First Franklin	Chicago Title
07/01/2005	1635 Connecticut Gary, Indiana	Resmae	Indiana Title
08/01/2005	612 Mount Gary, Indiana	Accredited	Chicago Title

07/08/2005	3906 Ohio Gary, Indiana	Global	Indiana Title
08/10/2005	532 Hovey Gary, Indiana	Freemont	Chicago Title
08/26/2005	2373 Kentucky Gary, Indiana	Global	Chicago Title

**COUNTS 1-4  
(Mail Fraud)**

19. On or about the dates listed below, in the Northern District of Indiana and elsewhere,  
the defendant

TAMEKA L. BRYANT,

and others known and unknown to the Grand Jury, having devised a scheme and artifice to defraud and obtain money and property by means of false and fraudulent pretenses, representations, promises, and material omissions, and for the purpose of executing the scheme, knowingly and willfully caused the following mail matters to be sent and delivered by DHL Express, a commercial interstate carrier and the United States Postal Service:

COUNT	DATE	MAIL MATTER	SENDER	RECIPIENT
1	11/15/2004	Loan payoff check in the amount \$36,654.56	Indiana Title	National City Bank
2	1/28/2005	Loan payoff check in the amount of \$29,437.50	Indiana Title	National City Bank
3	1/28/2005	Loan payoff check in the amount of \$32,745.11	Indiana Title	Homecomings Financial
4	2/17/2005	Broker fee checks	Ticor	Challenge Mortgage

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

**COUNTS 5-14  
(Wire Fraud)**

20. The allegations contained in paragraphs 1 through 18 of this Indictment are hereby re-alleged and incorporated by reference.

21. On or about the dates listed below, within the Northern District of Indiana, and elsewhere, the defendant

TAMEKA L. BRYANT,

and others known and unknown to the Grand Jury, having devised a scheme and artifice to defraud and obtain money and property by means of false and fraudulent pretenses, representations, promises, and material omissions, and for the purpose of executing the scheme, knowingly and wilfully caused to be transmitted by means of a wire communication in interstate commerce, any signs, signals, or sounds as specified below:

<u>Count</u>	<u>Property Involved &amp; Amount Wired</u>	<u>Date of Wire Transfer</u>	<u>From</u>	<u>To</u>
5	4312 Madison Gary, IN \$60,200.27	11/05/2004	Argent	Indiana Title
6	3943 Washington Gary, IN \$58,603.04	11/05/2004	Decision One	Ticor Title
7	2516 Fillmore Gary, IN \$49,815.44	11/12/2004	Argent	Indiana Title
8	3953 Washington \$60,138.72	11/12/2004	Decision One	Indiana Title
9	3732 Pennsylvania Gary, IN \$50,400	11/22/2004	Argent	Community Title

10	4120 Adams Gary, IN \$44,420.39	1/27/2005	Long Beach	Indiana Title
11	957 Lane Gary, IN \$36,132.45	1/27/2005	Long Beach	Indiana Title
12	3907 Monroe Gary, IN \$44,197.80	1/27/2005	Long Beach	Indiana Title
13	4377 Monroe Gary, IN \$42,176.16	1/27/2005	Long Beach	Indiana Title
14	4057 Rhode Island Gary, IN \$49,122.58	1/27/2005	Long Beach	Indiana Title

All in violation of Title 18, United States Code, Section 1343.

THE GRAND JURY FURTHER CHARGES:

**COUNT 15**  
**(Misuse of a Social Security Number)**

On or about March 3, 2004, in the Northern District of Indiana, the defendant,

TAMEKA L. BRYANT

for the purpose of obtaining something of value and for other purposes, and with the intent to deceive, falsely represented on an application for credit with GMAC Financial Services that xxx-xx-4721 was the Social Security Number assigned to her by the Commissioner of Social Security, when in fact, as she well knew, such number was not the Social Security Number assigned to her by the Commissioner.

In violation of Title 42, United States Code, Section 408(a)(7)(B).

THE GRAND JURY FURTHER CHARGES:

**COUNT 16**  
**(Misuse of a Social Security Number)**

On or about December 24, 2004, in the Northern District of Indiana, the defendant,

**TAMEKA L. BRYANT**

for the purpose of obtaining something of value and for other purposes, and with the intent to deceive, falsely represented on an application for credit at Albert's Diamond Jewelers that xxx-xx-4721 was the Social Security Number assigned to her by the Commissioner of Social Security, when in fact, as she well knew, such number was not the Social Security Number assigned to her by the Commissioner.

In violation of Title 42, United States Code, Section 408(a)(7)(B).

THE GRAND JURY FURTHER CHARGES:

**FORFEITURE**

1. The allegations in Counts 1 through 14 of this indictment are re-alleged as if fully set forth here.

2. Upon conviction of one or more of the offenses alleged in Counts 1 through 14 of this Indictment, the defendant,

TAMEKA L. BRYANT

shall forfeit to the United States pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c) any property, real or personal, which constitutes or is derived from proceeds traceable to the offenses. The property to be forfeited includes, but is not limited to, the following:

First Midwest Bank Account Number xxxx397  
First Midwest Bank Account Number xxxx384  
First Midwest Bank Account Number xxxx476  
First Midwest Bank Account Number xxxx646

**SUBSTITUTE ASSETS**

If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

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

difficulty; it is the intent of the United States, pursuant to 21 U.S.C. § 853(p) as incorporated by

18 U.S.C. § 982(b), to seek forfeiture of any other property of said defendant up to the value of the forfeitable property described above.

All pursuant to 18 U.S.C. §§ 981(a)(1)(C) and 982, and 28 U.S.C. § 2461(c).

A TRUE BILL:

S/Foreperson  
FOREPERSON

DAVID CAPP  
ACTING UNITED STATES ATTORNEY

By: S/Gary T. Bell  
Gary T. Bell  
Assistant U.S. Attorney