

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON TEXAS

United States Courts  
Southern District of Texas  
FILED

JUN 16 2008

Michael B. Milby, Clerk

UNITED STATES OF AMERICA §  
§  
V. §  
§  
LATASHA RENE BELLOW §  
a.k.a. Tasha §  
FRANKTHEA ANNETTE WILLIAMS §  
a.k.a. Frankie §  
ISHMAEL BOYD LARYEA §  
CHARLES JOSEPH-DESHAWN WILSON §  
KRISTEN ANNE WAY §  
ROBERT WILFRED STANLEY §

CRIMINAL NO.

**H-08-394**

**INDICTMENT**

**COUNT ONE**

**(Conspiracy - Title 18, U.S.C. §1349)**

At all times material to this Indictment:

A. Defendants

1. LATASHA RENE BELLOW, FRANKTHEA ANNETTE WILLIAMS, ISHMAEL BOYD LARYEA and CHARLES JOSEPH-DESHAWN WILSON operated in the Houston, Texas area under various business names. LATASHA RENE BELLOW used the name Nu Management and Development. FRANKTHEA ANNETTE WILLIAMS used the business names Cornerstone Financial, Cornerstone Financial Services, and First Capital Medical Supply, among others. ISHMAEL BOYD LARYEA and FRANKTHEA ANNETTE WILLIAMS used the business name IBL Investment

Group. CHARLES JOSEPH-DESHAWN WILSON used the business names Anointed Properties and Anointed Management.

2. KRISTEN ANNE WAY and ROBERT WILFRED STANLEY worked at Consumer Direct Mortgage, a mortgage brokerage office in Houston, Texas. KRISTEN ANNE WAY was a licensed loan officer. ROBERT WILFRED STANLEY was functioning as a loan officer at Consumer Direct Mortgage.

B. Residential Real Estate Closings

3. The Transaction that is the subject of a residential real estate closing (“Closing”) involves the purchase and sale of real property between two parties, the “Buyer” and the “Seller”. The Buyer is an individual or entity who, in a “Cash Transaction,” provides his own funds to pay 100% of the sales price, or, in a “Loan Transaction,” obtains the funding from a lending institution (the “Lender”), to purchase the real estate, which has approved the Buyer/Borrower (hereinafter “Borrower”) for a residential mortgage loan for up to 100% of the sales price. The Seller is an individual or entity who owns the property that is the subject of the transaction.

4. The documents used to apply for a real estate mortgage loan are collected by loan officers and loan processors at the mortgage broker’s office and transmitted to the Lender by United States mail and/or by commercial interstate carrier such as Federal Express and DHL Worldwide Express. These documents include, but are not limited to:

- a. The Uniform Loan Application executed by the Borrower
- b. Borrower’s credit report

- c. Verification of Employment
- d. Verification of Rent or Mortgage
- e. Lease agreements
- f. Verification of Deposit

5. The closing of the real estate transaction is conducted by a Title Company Escrow Agent or Closing Agent. The Title Company transmits documents prepared for the property closing to the Lender by facsimile as well as by United States mail and/or by commercial interstate carrier such as Federal Express and DHL Worldwide Express. The Lender funds the residential loans through a wire transfer from the Lender's bank to the Title company's bank account. After the loans are funded, the Title Company disburses the loan proceeds.

C. The Conspiracy

6. From in or about May 2004 and continuing through, on or about December 1, 2006 in the Southern District of Texas, and elsewhere, the defendants,

LATASHA RENE BELLOW a.k.a. Tasha  
FRANKTHEA ANNETTE WILLIAMS a.k.a. Frankie  
ISHMAEL BOYD LARYEA  
CHARLES JOSEPH-DESHAWN WILSON  
KRISTEN ANNE WAY  
ROBERT WILFRED STANLEY

did knowingly conspire and agree with at least one other person to commit the following offenses against the United States:

- a. To knowingly devise and intend to devise a scheme and artifice to defraud, and for obtaining money and property by means of false and

fraudulent pretenses, representations, and promises, and to knowingly use and cause to be used the United States mails and private and commercial interstate carriers for the purpose of executing the scheme and artifice to defraud, in violation of Title 18, United States Code, Section 1341;

b. To knowingly devise and intend to devise a scheme and artifice to defraud, and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises, and to knowingly use and cause to be used interstate wire communications facilities in carrying out the scheme to defraud, in violation of Title 18, United States Code, Section 1343;

D. Manner and Means of the Scheme

It was a part of the conspiracy that:

7. LATASHA RENE BELLOW and her coconspirators and agents would and did locate real estate (the "Properties") in the Houston, Texas area, frequently Properties for sale by condominium developers.

8. LATASHA RENE BELLOW, FRANKTHEA ANNETTE WILLIAMS, ISHMAEL BOYD LARYEA, CHARLES JOSEPH-DESHAWN WILSON, KRISTEN ANNE WAY, and ROBERT WILFRED STANLEY would and did recruit, solicit, compensate and cause to be compensated individuals with good credit to act as "Borrowers" in applications for residential mortgage loans to purchase one or more of the

Properties.

9. LATASHA RENE BELLOW, FRANKTHEA ANNETTE WILLIAMS, ISHMAEL BOYD LARYEA, CHARLES JOSEPH-DESHAWN WILSON, KRISTEN ANNE WAY, ROBERT WILFRED STANLEY, and their coconspirators and agents knew and intended that each Borrower would and did use and allow his or her name and other personal and financial information to be used and submitted to a “Lender” for the purpose of pretending and falsely representing that the Borrower was able to meet the financial obligations of the loan and had the incentive to do so.

10. KRISTEN ANNE WAY and ROBERT WILFRED STANLEY would and did act as mortgage loan officers assisting Borrowers in applying for residential mortgage loans.

11. LATASHA RENE BELLOW, FRANKTHEA ANNETTE WILLIAMS, ISHMAEL BOYD LARYEA, CHARLES JOSEPH-DESHAWN WILSON, KRISTEN ANNE WAY, ROBERT WILFRED STANLEY, and their coconspirators and agents would and did cause to be completed Uniform Residential Loan Applications in the names of the Borrowers in an attempt to obtain financing of the Property’s sales price which applications included false representations including the Borrower’s plan to occupy the Property as their primary residence, a pretense and false representation that LATASHA BELLOW, FRANKTHEA ANNETTE WILLIAMS, ISHMAEL BOYD LARYEA, CHARLES JOSEPH-DESHAWN WILSON, KRISTEN ANNE WAY,

ROBERT WILFRED STANLEY and their coconspirators knew was material to the Lenders' decisions to grant and fund the loans.

12. LATASHA RENE BELLOW, FRANKTHEA ANNETTE WILLIAMS, ISHMAEL BOYD LARYEA, CHARLES JOSEPH-DESHAWN WILSON, KRISTEN ANNE WAY, ROBERT WILFRED STANLEY, and their coconspirators and agents would and did prepare, authorize, disseminate, transmit and cause to be prepared, authorized, disseminated and transmitted through the United States mail and commercial interstate carriers and through interstate wire communications, to individuals and entities, including Lenders and their agents, false and fraudulent statements and other information, including but not limited to the ability and incentive of each Borrower to repay the loan, which the Defendants and their coconspirators knew and had reason to believe would be material to the Lender's decision to fund the mortgage loan and under what conditions.

13. LATASHA RENE BELLOW, FRANKTHEA ANNETTE WILLIAMS, ISHMAEL BOYD LARYEA, CHARLES JOSEPH-DESHAWN WILSON, KRISTEN ANNE WAY, and ROBERT WILFRED STANLEY would and did cause the title company handling the closing of the residential real estate transaction to disburse fraudulently-induced loan proceeds from the escrow accounts of the title companies to various individuals and entities.

14. LATASHA RENE BELLOW, FRANKTHEA ANNETTE WILLIAMS, ISHMAEL BOYD LARYEA, and CHARLES JOSEPH-DESHAWN would and did cause bank accounts to be opened in the Houston, Texas area under various business

names, including Nu Management and Development, Cornerstone Financial, IBL Investment Group, Anointed Properties, and Anointed Management for purposes including the deposit and transfer of proceeds of fraudulently-induced loans and to pay individuals who provided services necessary to promote and perpetuate the scheme.

15. LATASHA RENE BELLOW, FRANKTHEA ANNETTE WILLIAMS, ISHMAEL BOYD LARYEA, CHARLES JOSEPH-DESHAWN WILSON, KRISTEN ANNE WAY, ROBERT WILFRED STANLEY and the other coconspirators would and did induce Lenders to fund fraudulently obtained residential mortgage loans in the total amount of more than \$24 Million Dollars (\$24,000,000.00).

#### OVERT ACTS

In furtherance of the conspiracy described in Count One and to effect the objects thereof, the defendants named therein and other persons both known and unknown to the grand jury, performed or caused the performance of one or more of the following Overt Acts, among others not described herein, in the Southern District of Texas and elsewhere on or about the following dates:

- (1) March 31, 2005, CHARLES JOSEPH-DESHAWN WILSON caused Articles of Organization to be filed in the name of Anointed Properties Limited Liability Company with the Texas Secretary of State.
- (2) April 20, 2005, LATASHA RENE BELLOW caused a checking account in the name of Nu Management and Development to be opened at Amegy Bank.
- (3) April 28, 2005, FRANKTHEA ANNETTE WILLIAMS caused an Assumed Name Record for First Capital Medical Supply to be filed in the records of Harris County,

Texas.

(4) April 28, 2005, FRANKTHEA ANNETTE WILLIAMS caused Assumed Name Records for Cornerstone Financial and Corner Stone Builder/Investment Co. to be filed in the records of Harris County, Texas.

**9610 O'Connor Lane, Missouri City, Texas**

(5) May 2, 2005, KRISTEN ANNE WAY caused the credit report of CHARLES JOSEPH-DESHAWN WILSON to be generated.

(6) May 16, 2005, LATASHA RENE BELLOW caused a Request for Verification of Rent or Mortgage indicating CHARLES JOSEPH-DESHAWN WILSON rented 1731 Parklake Village, Katy, Texas for \$4,200 per month since April 1, 2003 to be signed.

(7) May 24, 2005, LATASHA RENE BELLOW caused to be filed in the records of Fort Bend County, a Texas Mortgage second lien in favor of Nu Management & Development in the amount of \$52,187.26.

(8) June 2, 2005, CHARLES JOSEPH-DESHAWN WILSON purchased 9610 O'Connor Lane, Missouri City, Texas for \$400,000.00.

(9) June 7, 2005, LATASHA RENE BELLOW caused the title company, Netco Inc., to wire transfer \$52,187.26 in loan proceeds to the bank account of Nu Management and Development.

(10) June 13, 2005, CHARLES JOSEPH-DESHAWN WILSON received \$27,500 from LATASHA RENE BELLOW in check 1049 drawn on the bank account of Nu Management and Development.

**9610 O'Connor Lane, Missouri City, Texas**

- (11) August 19, 2005, LATASHA RENE BELLOW caused to be faxed Washington Mutual bank statements in the name of the Borrower.
- (12) August 23, 2005, FRANKTHEA ANNETTE WILLIAMS caused a Request for Verification of Employment verifying that First Capital Medical Supply was the employer of the Borrower to be signed.
- (13) August 25, 2005, LATASHA RENE BELLOW caused an Affidavit Claiming Mechanic's Lien to be faxed.
- (14) August 26, 2005, FRANKTHEA ANNETTE WILLIAMS, as the President of Cornerstone Financial, caused a Mechanic's Lien in the amount of \$51,163.00 to be filed in the Harris County records.
- (15) September 15, 2005, CHARLES JOSEPH-DESHAWN WILSON sold 9610 O'Connor Lane, Missouri City, Texas for \$470,000.00 to the Borrower.
- (16) September 16, 2005, FRANKTHEA ANNETTE WILLIAMS caused the title company, Netco Inc., to provide her \$51,163.00 in loan proceeds from the closing of the real estate transaction on 9610 O'Connor Lane, Missouri City, Texas.
- (17) September 16, 2005, FRANKTHEA ANNETTE WILLIAMS purchased Bank One official check, number 450015100 in the amount of \$30,000 payable to ISHMAEL BOYD LARYEA.

**1731 Parklake Village, Katy, Texas**

- (18) September 16, 2005, ROBERT WILFRED STANLEY, caused a credit report to be

generated in the Borrower's name and social security number.

(19) September 28, 2005, LATASHA RENE BELLOW, caused a Real Estate Lease agreement which reflected LATASHA RENE BELLOW leased 1731 Parklake Village, Katy, Texas to the Borrower for \$4,200 a month for the period September 30, 2004 through October 31, 2005 to be faxed.

(20) October 18, 2005, LATASHA RENE BELLOW caused check 1151 in the amount of \$20,000 drawn on the account of Nu Management and Development at Amegy Bank to be payable to the Borrower.

(21) October 18, 2005, LATASHA RENE BELLOW paid FRANKTHEA WILLIAMS \$40,000 through check 1152 drawn on the account of Nu Management and Development at Amegy Bank.

**58 Briar Hollow #305, Houston, Texas**

(22) October 4, 2005, ISHMAEL BOYD LARYEA caused an Assumed Name Record for IBL Investment Group to be filed in the records of Harris County, Texas.

(23) December 2, 2005, FRANKTHEA WILLIAMS caused a Request for Verification of Rent or Mortgage to be signed on behalf of the landlord, IBL Investments.

(24) January 10, 2006, FRANKTHEA WILLIAMS caused the Borrower's employment to be verified as an account manager at First Capital Medical Supply.

(25) January 13, 2006, ISHMAEL BOYD LARYEA caused Southern American Title Company to wire transfer \$67,000 in loan proceeds into the bank account of IBL Investment Group.

(26) January 13, 2006, LATASHA RENE BELLOW caused Southern American Title Company to wire transfer \$18,000 in loan proceeds into the bank account of Nu Management and Development.

(27) January 17, 2006, ISHMAEL BOYD LARYEA caused check number 1085 payable to the Borrower in the amount of \$6,000.00 and issued on the account of IBL Investment Group to be provided to the Borrower.

**6529 Grapevine Street, Houston, Texas**

(28) December 19, 2005, CHARLES JOSEPH-DESHAWN WILSON caused a Request for Verification of Employment to be signed indicating the Borrower was employed at His Kingdom Barber and Beauty.

(29) December 21, 2005, LATASHA RENE BELLOW caused a Request for Verification of Rent or Mortgage to be signed verifying the Borrower was renting 3802 Blodgett, Houston, Texas.

(30) December 29, 2005, CHARLES JOSEPH-DESHAWN WILSON caused an Assumed Name Record for Anointed Management LLC to be filed in the records of Travis County, Texas.

(31) January 12, 2006, LATASHA RENE BELLOW caused an official check, check number 11491876, to be purchased payable to Southern American Title in the amount of \$3,378.19 from Amegy Bank.

(32) January 20, 2006, LATASHA RENE BELLOW caused Southern American Title to wire transfer to the bank account of Nu Management and Development \$7,675.80 in

loan proceeds.

(33) January 20, 2006, CHARLES JOSEPH-DESHAWN WILSON caused Southern American Title to wire transfer to the bank account of Anointed Management \$14,520.20 in loan proceeds.

(34) January 23, 2006, CHARLES JOSEPH-DESHAWN WILSON caused the Borrower to be paid \$6,500 in check 1003 drawn on the account of Anointed Management Bank at Amegy Bank.

**58 Briar Hollow #303, Houston, Texas**

(35) January 19, 2006, KRISTEN ANNE WAY caused a Request for Verification of Rent or Mortgage to be signed.

(36) January 26, 2006, KRISTEN ANNE WAY attended the real estate closing of 58 Briar Hollow #303, Houston, Texas with the Borrower at Southern American Title Company.

(38) January 30, 2006, LATASHA RENE BELLOW caused Southern American Title to wire transfer to the bank account of Nu Management and Development \$85,000 in loan proceeds.

**58 Briar Hollow #408, Houston, Texas**

(39) January 26, 2006, KRISTEN ANNE WAY attended the real estate closing of the property located at 58 Briar Hollow #408 at Southern American Title Company.

(40) January 30, 2006, LATASHA RENE BELLOW caused Southern American Title Company to wire transfer to the bank account of Nu Management and Development

\$90,000 in loan proceeds.

(41) January 31, 2006, KRISTEN ANNE WAY received, into her account at Sterling Bank, \$3,983.50 by wire transfer from LATASHA RENE BELLOW's Nu Management and Development account.

(42) January 31, 2006, KRISTEN ANNE WAY caused Avanti Mortgage Services Inc. d/b/a Consumer Direct Mortgage to wire transfer into her Sterling bank account \$11,990 for the closing of the real estate transactions for the properties located at 58 Briar Hollow units #303 and #408.

(43) January 31, 2006, ROBERT WILFRED STANLEY caused Avanti Mortgage Services Inc. d/b/a Consumer Direct Mortgage to wire transfer to his Washington Mutual bank account \$11,990 for the closing of the real estate transactions for the properties located at 58 Briar Hollow units #303 and #408.

**3350 McCue Drive #602, Houston, Texas**

(44) March 22, 2006, ROBERT WILFRED STANLEY signed a Purchase Agreement to purchase condominium #602 at 3350 McCue Drive, Houston, Texas for \$484,400.00.

(46) May 19, 2006, ROBERT WILFRED STANLEY certified that all the information in the loan application, including income information and assets and liabilities were true and complete and that no misrepresentations were made by him in the loan application or other documents nor was any pertinent information.

(47) May 19, 2006, ROBERT WILFRED STANLEY signed a Occupancy Rider to Mortgage/Deed of Trust/Security Deed.

(48) May 26, 2006, LATASHA RENE BELLOW caused ANSS TX, LLC d/b/a Access Title to disburse \$55,000 in loan proceeds to Nu Management and Development's bank account.

All in violation of Title 18, United States Code, Section 1349.

## **WIRE FRAUD COUNTS**

### **COUNTS TWO through FIVE (Title 18, U.S.C. §1343 and 2)**

1. The Grand Jury realleges and incorporates by reference, as though fully set forth herein, the allegations contained in sections A , B and D as set out in Count One of the indictment.

2. On or about the following dates in the Southern District of Texas, the named defendants, aided and abetted by others known and unknown to the grand jury, did knowingly devise, intend to devise, and participate in a scheme and artifice to defraud and to obtain money and property by means of false and fraudulent pretenses, representations and promises, and for the purpose of executing the scheme and artifice to defraud, and to obtain money by means of false and fraudulent pretenses and representations did cause to be transmitted in interstate commerce, by means of a wire communication, loan funds from the bank account of the Lender through the Federal Reserve Bank of New York into the bank account of the Title Company as follows in Counts Two through Five:

<b>COUNT</b>	<b>DATE</b>	<b>DEFENDANT</b>	<b>TRANSMISSION DESCRIPTION</b>
Two	September 14, 2005.	LATASHA RENE BELLOW and CHARLES JOSEPH-DESHAWN WILSON	Wire transfer of \$194,415.48 from Long Beach Mortgage to Southern American Title to purchase 1342 Rutland #205, Houston, Texas.
Three	December 15, 2005	LATASHA RENE BELLOW, ISHMAEL BOYD LARYEA and FRANKTHEA ANNETTE WILLIAMS	Wire transfer of \$367,150.83 from CSFB Buyer/Fieldstone Investment to Southern American Title to purchase 3311 Yupon #306, Houston, Texas.
Four	January 27, 2006	LATASHA RENE BELLOW and KRISTEN ANNE WAY	Wire transfer of \$397,527.76 from Wilmington Finance to Southern American Title to purchase 58 Briar Hollow #408, Houston, Texas.
Five	August 28, 2006	ROBERT WILFRED STANLEY	Wire transfer of \$354,746.40 from Aegis Funding to Access Title Company to purchase 3350 McCue #1701, Houston, Texas.

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

## **MONEY LAUNDERING COUNTS**

### **COUNT SIX (Title 18, U.S.C. §1956(h))**

A. The Grand Jury realleges and incorporates by reference, as though fully set forth herein, the allegations contained in sections A and C as set out in Count One of the indictment.

B. From in or about May 2004 to on or about December 1, 2006, in the

Southern District of Texas, and elsewhere, and within the jurisdiction of this Court

LATASHA R. BELLOW a.k.a. Tasha  
FRANKTHEA ANNETTE WILLIAMS a.k.a. Frankie  
ISHMAEL BOYD LARYEA  
CHARLES JOSEPH-DESHAWN WILSON  
KRISTEN ANNE WAY  
ROBERT WILFRED STANLEY

defendants herein, did unlawfully, knowingly and intentionally combine, conspire, confederate and agree with each other and others known and unknown to the grand jury, to commit the following offenses against the United States in violation of Title 18, United States Code, Section 1956 and 1957, to wit:

1. To knowingly and willfully conduct and attempt to conduct a financial transaction affecting interstate commerce which involved the proceeds of a specified unlawful activity, with the intent to promote the carrying on of specified unlawful activity, that is, wire fraud, a violation of Title 18, United States Code, 1343 and mail fraud, Title 18, United States Code, Section 1341, and that while conducting and attempting to conduct such financial transaction knew that the property involved in the financial transaction, that is funds and monetary instruments represented the proceeds of some form of unlawful activity, in violation of Title 18, United States Code, Section 1956 (a)(1)(A)(i).

2. To knowingly and willfully conduct and attempt to conduct a financial transaction, the activities of which affect interstate commerce with the proceeds of a specified unlawful activity, that is, wire fraud, a violation of Title 18, United States Code,

Section 1343 and mail fraud, a violation of Title 18, United States Code, Section 1341, knowing that the transaction was designed in whole and in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of said specified unlawful activity and that while conducting and attempting to conduct such financial transaction knew that the property involved in the financial transaction, that is funds and monetary instruments represented the proceeds of some form of unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

3. To knowingly engage in and attempt to engage in monetary transactions within the United States in criminally derived property that is of a value greater than \$10,000 and is derived from specified unlawful activity, that is, wire fraud and mail fraud, in violation of Title 18, United States Code, Section 1957.

All in violation of Title 18, United States Code, Section 1956(h).

**COUNTS SEVEN THROUGH TEN**  
**(Title 18, U.S.C. § 1957(a))**

1. The Grand Jury realleges and incorporates by reference, as though set forth in full herein, the allegations set forth in Sections A, B and D of Count One of this Indictment.

2. On or about the following dates, in the Southern District of Texas and elsewhere, the defendants named below did knowingly engage in, and attempt to engage in, monetary transactions affecting interstate commerce in criminally derived property of a value greater than \$10,000, that is, the negotiation of the following checks, each in the amount of more than \$10,000, such funds having been derived from specified unlawful

activity, that is, wire fraud, in violation of Title 18, United States Code, Section 1343.

<b>COUNT</b>	<b>DATE</b>	<b>DEFENDANT</b>	<b>FINANCIAL TRANSACTION</b>
Seven	September 19, 2005	LATASHA RENE BELLOW and CHARLES JOSEPH-DESHAWN WILSON	Check 1138 written on the account of Nu Management and Development in the amount of \$17,808.98 and deposited into the account of Anointed Properties
Eight	December 16, 2005	ISHMAEL BOYD LARYEA and FRANKTHEA ANNETTE WILLIAMS	Check 1048 written on the account of IBL Investments in the amount of \$28,500.00 and deposited into the account of Cornerstone Financial Services.
Nine	January 26, 2006	LATASHA RENE BELLOW and ROBERT WILFRED STANLEY	Check 1284 written on the account of Nu Management and Development in the amount of \$31,000.00 and negotiated by ROBERT WILFRED STANLEY
Ten	February 1, 2006	LATASHA RENE BELLOW and KRISTEN ANNE WAY	Check 1290 written on the account of Nu Management and Development in the amount of \$33,000.00 and cashed by the Borrower

In violation of Title 18, United States Code, Section 1957(a) and 2

**NOTICE OF FORFEITURE**  
**(18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461)**

Pursuant to Title 28, United States Code, Section 2461(C), and Title 18, United States Code, Section 981(a)(1)(C) the United States gives the defendants

LATASHA BELLOW a.k.a. Tasha (counts 1-4)  
FRANKTHEA ANNETTE WILLIAMS a.k.a. Frankie (counts 1,3)  
ISHMAEL BOYD LARYEA (counts 1,3)  
CHARLES JOSEPH-DESHAWN WILSON(counts 1,2)  
KRISTEN ANNE WAY (counts 1,4)  
ROBERT WILFRED STANLEY (counts 1,5)

notice that in the event of conviction, all property which constitutes or is derived from proceeds traceable to a violation of Title 18, United States Code, Sections 1341 and 1343, including a conspiracy to commit such offenses, as charged in Counts One through Five of the Indictment, shall be forfeited to the United States. The property subject to forfeiture includes, but is not limited to, the following property:

Count One	\$ 24,000,000.00
Count Two	\$ 194,415.48
Count Three	\$ 367,150.83
Count Four	\$ 397,527.76
Count Five	\$ 354,746.40

or a sum of money equal to the amounts of money listed above for which the defendants may be jointly and severally liable to the United States.

**NOTICE OF FORFEITURE**  
(18 U.S.C. § 982(a)(1))

Pursuant to Title 18, United States Code, Section 982(a)(1), the United States gives the defendants

LATASHA BELLOW a.k.a. Tasha (counts 6, 7, 9, 10)  
FRANKTHEA ANNETTE WILLIAMS a.k.a. Frankie (counts 6, 8)  
ISHMAEL BOYD LARYEA (counts 6, 8)  
CHARLES JOSEPH-DESHAWN WILSON(counts 6, 7)  
KRISTEN ANNE WAY (counts 6, 10)  
ROBERT WILFRED STANLEY (counts 6, 9)

notice that in the event of conviction , all property involved in a violation of Title 18, United States Code, Section 1956 and 1957, or a conspiracy to commit such offenses, as charged in Counts Six through Ten of the Indictment, and all property traceable to such property, shall be forfeited to the United States. The property subject to forfeiture includes, but is not limited to, the following property:

Count Six	\$ 24,000,000.00
Count Seven	\$ 17,808.98
Count Eight	\$ 28,500.00
Count Nine	\$ 31,000.00
Count Ten	\$ 33,000.00

or a sum of money equal to the amounts of money listed above, for which the defendants may be jointly and severally liable to the United States.

#### **SUBSTITUTE ASSETS**

In the event that the property subject to forfeiture as a result of any act or omission of the defendant:

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

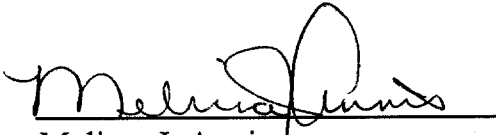
it is the intent of the United States to seek forfeiture of any other property of the defendant

up to the value of such property pursuant to Title 21, United States Code, Section 853(p), incorporated by reference in Title 18, United States Code, Section 982(b)(1) and Title 28, United States Code, Section 2461.

ORIGINAL SIGNATURE ON FILE

FOREPERSON OF THE GRAND JURY

DONALD J. DeGABRIELLE, JR.  
United States Attorney

By:   
Melissa J. Annis  
Assistant United States Attorney