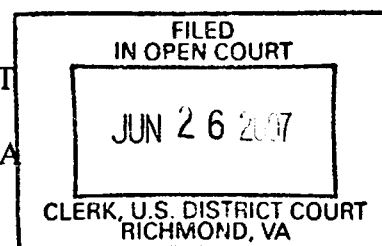


IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA

Richmond Division



UNITED STATES OF AMERICA,) Criminal No. 3:07CR252
)
v.) 18 U.S.C. § 1344
) Bank Fraud
ANTHONY T. HARRELSON,) (Counts One through Nine)
Defendant.)
) 18 U.S.C. § 1956
) Money Laundering
) (Count Ten)
)
) Forfeiture Allegation

INDICTMENT

June 2007 Term - At Richmond, Virginia

THE GRAND JURY CHARGES THAT:

Introduction

At all relevant times:

1. ANTHONY T. HARRELSON resided at 6637 Southshore Drive, Midlothian, Virginia. In or about May 2005, HARRELSON purchased this property for approximately \$240,000 and acquired from Wachovia Bank a first mortgage on this property in the amount of \$40,000.

2. People's Bank, BB&T, First Citizens Bank, Provident Bank, Union Bank and Trust, Central Virginia Bank, Bank of America, Wachovia Bank, Millenium Bank, and JP Morgan Chase were federally-insured financial institutions, as defined in Title 18, United States Code,

Section 20.

Scheme and Artifice to Defraud No.1

3. It was part of this scheme and artifice that in or about mid-September 2006, the defendant, ANTHONY T. HARRELSON, applied for home equity loans from eight separate federally-insured financial institutions, each loan to be secured by his primary residence at 6637 Southshore Drive, Midlothian, Virginia. In each loan application, HARRELSON knowingly failed to disclose that he was applying for multiple lines of credit from other financial institutions. At the closing on each loan, HARRELSON certified that there were no other liens or encumbrances upon the property.

4. In or about late September 2006, each financial institution approved equity lines of credit for defendant HARRELSON in amounts ranging from \$115,000 to \$165,000.

5. When the loans closed in or about the first week of October 2006, HARRELSON obtained official cashier's checks from seven financial institutions and, on or about October 4, 2006, deposited these checks representing proceeds from these seven lines of credit into a money market account at Bank of Richmond, for a total deposit of \$1,002,516.64.

6. On or about October 10, 2006, HARRELSON opened a bank account with Bank of America using a deposit of \$134,000, representing the proceeds from his line of credit with Bank of America. HARRELSON immediately wired \$133,975 for credit to his account at Millenium Bank, Reston, Virginia.

7. On or about October 13, 2006, HARRELSON opened a SunTrust business bank account in the name of Hometown Realty of Virginia, with an address of 6637 Southshore Drive, Midlothian, Virginia. HARRELSON made an initial deposit into the account of \$1,000.

8. On or about October 17, 2006, HARRELSON wired approximately \$546,554.00 from his Bank of Richmond money market account to the Hometown Realty SunTrust business account. The same day, HARRELSON wired approximately \$268,193 from his Millenium bank account into the Hometown Realty account at SunTrust. The sum of money in this latter wire transfer was comprised of two wire transfers from the Bank of America totaling \$133,975 and the balance contained in a wire transfer from Chase Manhattan.

9. On or about October 25, 2006, HARRELSON made a payment to his Bank of America credit line in the amount of \$133,975, drawn on a starter check from the Hometown Realty account at SunTrust.

10. When the various banks conducted a title search on the property securing the loan, they discovered multiple recorded deeds of trust. When confronted with this information from Peoples Bank of Virginia on or about October 10, 2006, HARRELSON initially failed to offer a satisfactory explanation, but later advised that he had consulted with an attorney who opined that HARRELSON had done nothing improper in connection with the lines of credit. Shortly thereafter, HARRELSON made payments on his lines of credit at Central Virginia Bank, Union Bank and Trust, People's Bank, and BB&T.

11. After the lenders began discovering the multiple liens on HARRELSON's property, a fraud alert was placed on HARRELSON's credit report. When HARRELSON was confronted about this alert by employees of BB&T and People's Bank of Virginia, he advised that he had been a victim of credit card fraud.

12. On or about October 25, 2006, when HARRELSON learned that his SunTrust account was frozen, he immediately, but unsuccessfully, attempted to issue checks to the remaining banks

holding outstanding loans, that is, First Citizens Bank, Provident Bank, and Wachovia Bank.

13. During and in furtherance of the scheme, defendant HARRELSON made one or more materially false representations in connection with his loan applications, to include, falsely representing the name of the CFO of his employer in an Employment Verification Letter; falsely representing that he had earned a Masters degree in Business Administration; and falsely representing his marital status as single, when in truth and in fact HARRELSON was married and his spouse worked for a local financial institution.

Counts One through Eight
(Bank Fraud)

14. The foregoing paragraphs one through thirteen are realleged and incorporated herein by reference.

From in or about September 2006, through in or about October 2006, in Richmond, Virginia, and elsewhere within the jurisdiction of this Court, the defendant, ANTHONY T. HARRELSON, knowingly executed and attempted to execute a scheme and artifice to defraud a federally-insured financial institution, and to obtain moneys, funds, credits, assets, securities, or other property, owned by or under the custody or control of said institution by means of false and fraudulent pretenses, representations, and promises, to wit: defendant ANTHONY T. HARRELSON, made virtually contemporaneous applications for an equity loan at eight federally-insured financial institutions, while offering to each lender his primary residence as collateral for a second deed of trust, thereby causing the issuance of proceeds from each line of credit before each institution recorded their lien and discovered the multiple equity lines of credit, each withdrawal of proceeds constituting a separate offense as follows:

| <u>Count</u> | <u>Bank</u> | <u>Date of Withdraw</u> | <u>Amount</u> |
|--------------|------------------|-------------------------|---------------|
| One | People's Bank | 10-3-06 | \$134,916.04 |
| Two | BB&T | 10-4-06 | \$160,000 |
| Three | First Citizens | 10-4-06 | \$165,000 |
| Four | Provident | 10-4-06 | \$134,000 |
| Five | Union Bank | 10-4-06 | \$160,000 |
| Six | Central Virginia | 10-4-06 | \$134,000 |
| Seven | Wachovia | 10-4-06 | \$115,600 |
| Eight | Bank of America | 10-10-06 | \$134,000 |

(In violation of Title 18, United States Code, Section 1344).

Scheme and Artifice to Defraud No. 2

15. On or about May 10, 2007, the defendant, ANTHONY T. HARRELSON, caused the filing of a fraudulent gift deed in Chesterfield County, Virginia. This deed purported to gift the real property located at 6548 St. Cecilia Drive, Midlothian, Virginia, from Grantor Marion C. Waddell to the defendant, notarized by Vince L. Moran. Mr. Waddell is an elderly widower who owns property in the defendant's neighborhood.

16. The owner of the foregoing property, Marion C. Waddell, neither knew the defendant nor did he gift deed his real property to the defendant. A records check by the Secretary for the Commonwealth of Virginia revealed no records pertaining to a licensed Notary Public named Vince L. Moran.

17. On or about May 14, 2007, a summons was issued for the defendant to appear at a federal court hearing on May 29, 2007 in Richmond, Virginia. The summons was served upon

the defendant on or about May 17, 2007.

18. On or about May 21, 2007, HARRELSON took out a \$127,000 home equity line of credit on property located at 6548 Saint Cecilia Drive, Midlothian, Virginia, while representing himself as the true owner of said property to the lender, JP Morgan Chase.

19. On or about May 22, 2007, HARRELSON made a cash purchase of a one-way Amtrak ticket from Richmond, Virginia to Albuquerque, New Mexico, using a Nebraska identification card in the name of Scott L. Smith, and boarded the train at the Staples Mill Amtrak Station in Richmond, Virginia.

20. On or about May 25, 2007, HARRELSON attempted to wire the \$127,000 in proceeds from the home equity line of credit to an off-shore bank account in the West Indies, the Bank of Nevis International, Ltd. ("Bank of Nevis").

21. Having failed to wire the funds to Bank of Nevis, HARRELSON caused the wiring of the \$127,000 from JP Morgan Chase to Wachovia Bank on May 29, 2007. That same day, HARRELSON failed to appear for his federal court hearing.

Count Nine
(Bank Fraud)

22. The foregoing paragraph numbers fifteen through twenty-one are re-alleged and incorporated herein by reference.

On or about May 21, 2007, in Richmond, Virginia, and elsewhere within the jurisdiction of this Court, the defendant, ANTHONY T. HARRELSON, knowingly executed and attempted to execute a scheme and artifice to defraud a federally-insured financial institution, and to obtain moneys, funds, credits, assets, securities, or other property, owned by or under the custody or

control of said institution by means of false and fraudulent pretenses, representations, and promises, that is, ANTHONY T. HARRELSON caused JP Morgan Chase to open for his benefit a home equity line of credit of approximately \$127,000 based upon HARRELSON's false representations about his ownership of the subject property at 6548 Saint Cecilia Drive, Midlothian, Virginia.

(In violation of Title 18, United States Code, Section 1344).

Count Ten
(Money Laundering)

23. The foregoing paragraphs fifteen through twenty-two are re-alleged and incorporated herein by reference.

On or about May 29, 2007, in the Eastern District of Virginia, and elsewhere within the jurisdiction of the Court, defendant ANTHONY T. HARRELSON, did knowingly and willfully conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce, to wit: the wiring of funds from JP Morgan Chase to Wachovia Bank, which involved the proceeds of specified unlawful activity, that is, bank fraud in violation of 18 U.S.C. § 1344, 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 a wire transfer of approximately \$127,000, represented the proceeds of some form of unlawful activity.

(In violation of Title 18, United States Code, Section 1956(a)(1)(B)(i)).

Forfeiture Allegation

Pursuant to Fed. R. Crim. P. 32.2(a), the defendant is hereby notified that, if convicted of the offenses alleged above in Counts One through Ten, the defendant shall forfeit to the United States his interest in any property, real or personal, involved in or traceable to the money laundering offense charged in Count Ten, and any property, real or personal, which constitutes or is derived from proceeds traceable to the bank fraud offenses charged in Counts One through Nine. If property subject to forfeiture cannot be located, the United States will seek an order forfeiting substitute assets.

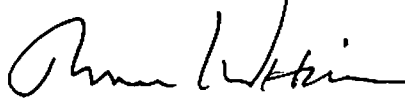
(In accordance with Title 18, United States Code, Sections 982(a)(1) and (2)).

A TRUE BILL:
Pursuant to the E-Government Act,
the original of this page has been filed
under seal in the Clerk's Office.

Foreperson

CHUCK ROSENBERG
UNITED STATES ATTORNEY

By: _____



Brian L. Whisler
Assistant United States Attorney