

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF MARYLAND**

UNITED STATES OF AMERICA

v.

**CRIMINAL COMPLAINT**

**MELVA MASSEY**

CASE NUMBER: 10-1276 CBD

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief:

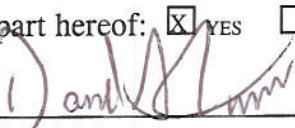
Beginning at least in or about June 2007 and continuing through at least in or about September 2007, in the District of Maryland and elsewhere, the defendant, **MELVA MASSEY**, together with others known and unknown to the United States, did unlawfully, knowingly and willfully conspire, combine, confederate and agree with each other and other persons to knowingly devise a scheme and artifice to defraud by means of materially false and fraudulent pretenses, representations, and promises, and material omissions and for the purpose of executing and attempting to execute the scheme to defraud would and did transmit and cause to be transmitted by means of wire and radio communication in interstate and foreign commerce, writings, signs, signals, pictures and sounds, in violation of 18 U.S.C. § 1343.

18 U.S.C. § 1349

I further state that I am a Special Agent, Federal Reserve Board, Office of Inspector General and that this Complaint is based on the following facts:

SEE ATTACHED AFFIDAVIT

Continued on the attached sheet and made a part hereof: ☒ YES ☐ NO

  
\_\_\_\_\_  
Special Agent  
Federal Reserve Board  
Office of Inspector General

Sworn to before me and subscribed in my presence, on

April 8, 2010 at Greenbelt, Maryland  
Date

Charles B. Day  
United States Magistrate Judge

  
\_\_\_\_\_  
Signature of Judicial Officer

10-1274 CBD (orig)  
10-1275 CBD  
10-1276 CBD  
10-1277 CBD

**AFFIDAVIT**

**I. PRELIMINARY INFORMATION**

1. I, David A. Timm, Special Agent, Federal Reserve Board Office of Inspector General, being duly sworn, depose and state as follows:

2. I am a Federal Agent, authorized to investigate violations of the laws of the United States, and I am a law enforcement officer with authority to execute arrest and search warrants issued under the authority of the United States.

3. Your Affiant has been a Special Agent (SA) with the Federal Government, for over 25 years, and has been assigned the responsibility for conducting white collar crime investigations since June 1996. White collar crimes are considered to be those illegal acts characterized by fraud, concealment, or a violation of trust and which are not dependent upon the application or threat of physical force or violence. I have received formal and informal training regarding the conduct of white collar crime investigations. Since 1996, I have been assigned as case agent on numerous white collar crime investigations involving violations of Federal law which include, but are not limited to, bank fraud, mail fraud, wire fraud, money laundering, and conspiracy.

4. Your affiant has attended mortgage fraud conferences. Your affiant is an active member of the Maryland Mortgage Fraud Task force that investigates mortgage fraud along with other local, state and federal law enforcement and the State of Maryland Department of Labor, Licensing and Regulation (DLLR) agencies.

5. The information set forth in this Affidavit is known to me as a result of investigation personally conducted by me or by other law enforcement agents. Statements are also based in part on review of records obtained by federal grand jury subpoenas, documents gathered during the

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course of the investigation, interviews and on my experience as a Special Agent.

6. This affidavit contains information necessary to support the issuance of criminal complaints and a search warrant and is not intended to include each and every fact and matter known to the Government. Moreover, to the extent that this affidavit contains statements by witnesses, those statements are set forth only in part and in substance and are intended to accurately convey the information, but not to be verbatim recitations, unless indicated otherwise.

7. The facts and circumstances set forth below in this Affidavit demonstrate that there is probable cause to believe that **LYNZI WADDELL RICHARDSON, D'VON MASSEY**, and **MELVA MASSEY** have committed the offense of conspiracy to commit wire fraud, in violation of Title 18, United States Code Section 1349.

8. The facts and circumstances set forth below in this Affidavit demonstrate that there is probable cause to believe that the property located at 6308 Rigoli Lane, Glenn Dale, Maryland 20769 (the "Residence") contains evidence, fruits and instrumentalities of conspiracy to commit wire fraud, in violation of Title 18, United States Code Section 1349.

## **II. SUBJECT BACKGROUND INFORMATION**

9. **RICHARDSON** was born in 1979, has a Social Security Number ending in 1855, and resides in Glenn Dale, Maryland.

10. A review of state wage and employment records reveals that, at all times relevant to this matter, **RICHARDSON** was employed by the following four mortgage companies: (1) Carteret Mortgage Company; (2) Patriot Mortgage Corporation; (3) Capital Mortgage Finance; and (4) Potomac Mortgage Capital.

11. Your affiant made a recent inquiry with the State of Maryland Wage Records and DLLR



which advised that **RICHARDSON** had total 2007 reported earnings from Patriot Mortgage Corporation and Carteret Mortgage Corporation of \$183,295.00. **RICHARDSON** had 2008 reported earnings from Patriot Mortgage Corporation of \$25,090.00.

12. **D'VON MASSEY ("D'VON")** was born in 1972, has a Social Security Number ending in 4158, and is believed to reside in Walford, Maryland.

13. **MELVA MASSEY ("MELVA")** was born in 1971, has a Social Security Number ending in 5307, and is believed to reside in Walford, Maryland.

### **III. PROBABLE CAUSE**

14. Based on my training and experience, I know that mortgage brokers employed by mortgage companies are compensated based on the number of mortgages they generate. Typically, a mortgage broker is compensated several thousand dollars for generating a mortgage. Thus, the more mortgages generated by a broker, the more compensation the broker receives.

15. Your affiant has reviewed several mortgages that were prepared and submitted by **RICHARDSON** while she was employed at various mortgage companies. As relevant to this matter, the following is a table of three mortgages generated by **RICHARDSON**:

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	5300 New Hampshire Ave Washington, DC	827 Quakenbos St NW Washington, DC	328 18th Street NW Washington, DC
Borrower	<b>D'VON and MELVA</b>	<b>D'VON and MELVA</b>	<b>D'VON and MELVA</b>
Mortgage App. Date	June 30, 2007	September 1, 2007	September 17, 2007
Mortgage Interviewer	<b>RICHARDSON</b> (Carteret Mortgage)	<b>RICHARDSON</b> (Patriot Mortgage)	<b>RICHARDSON</b> (Patriot Mortgage)
Receiving Bank	Countrywide	National City Bank	Flagstar Bank
Primary Residence?	Y	Y	Y
Rental Income Listed	\$2850 per month	\$2350 per month	\$2350 per month
Address of Rental Property	3092 Gideon Ct Waldorf, MD	3092 Gideon Ct Waldorf, MD	3092 Gideon Ct Waldorf, MD
Renter	T.M.	T.M.	T.M.
Date of Lease	June 20, 2007	June 20, 2007	September 17, 2007
Security Deposit Documentation Supporting Rental Property	M&T Bank Cashier's Check No. 288376730-1 for \$3000	M&T Bank Cashier's Check No. 288376730-1 for \$3000	M&T Bank Cashier's Check No. 288376730-1 for \$3000
Mortgage Amount	\$507,600	\$389,900	\$307,767
Mortgage Issued	July 12, 2007	September 14, 2007	September 26, 2007
Status of Mortgage	Foreclosure	Foreclosure	Foreclosure
Loss Amount	\$432,120.44	To be determined	\$127,443.63

16. Based on your affiant's training and experience, I believe that these three mortgage applications contain several indicators of fraud, specifically: (1) despite the fact that all three mortgage applications were applied for by **D'VON** and **MELVA** (and processed by

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**RICHARDSON**) within a three month period, all three applications for different properties indicated that each of the subject properties was to be the applicants' primary residence; (2) although each of the mortgage applications attaches a copy of a \$3,000 cashier's check (M&T Bank Cashier's Check No. 288376730-1) payable to **MELVA** purporting to be the security deposit for the rental property, M&T Bank records for Cashier's Check No. 288376730-1 reveals that the actual M&T Bank Cashier's Check No. 288376730-1 was issued on October 14, 2003 and made payable to "Residential Title" for \$12,000; (3) two of the three above-referenced mortgage applications included a verification of deposit from Old Line Bank purporting to confirm that **D'VON** and **MELVA** had over \$55,000 in deposits with Old Line Bank, attaching a certification allegedly signed by an Old Line Bank employee (M.C.). However, law enforcement agents have interviewed senior Old Line Bank officials, who confirmed that no such deposits ever existed for **D'VON** and **MELVA**, and Old Line Bank employee M.C. has submitted an affidavit indicating she did not sign the verification of deposit.

17. I have reviewed driver's license information for **RICHARDSON**, **D'VON** and **MELVA** on file with the Maryland Vehicle Administration, and the signatures on file appear to match those appearing on the three mortgage applications referenced above.

18. I have recently conducted research into the Residence and confirmed through a representative of the United States Postal Service that **RICHARDSON** presently receives mail at the Residence. **RICHARDSON** is listed as the current owner of the Residence, along with **RICHARDSON**'s parents and spouse. **RICHARDSON**'s driver's license records show that the address associated with **RICHARDSON** is that of the Residence.

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#### IV. AFFIANT'S TRAINING AND EXPERIENCE

19. Based on my training and experience, the training and experience of other investigators working on this case, and on the facts described above, I know that it is common for individuals involved in financial crime to maintain financial documents and records relating to their personal and business affairs. These documents will show the acquisition, conversion, movement, secretion, transfer, and distribution of currency, real property, and personal property. It is also common for such persons to maintain financial instruments that are the proceeds of, or facilitating property of, the illegal activity. These documents, records, and financial instruments are often retained for long periods of time in secure and accessible locations, including in residences; businesses; vehicles; work spaces, desks, and file cabinets; office and home computers and personal communication devices; safe deposit boxes; banks; and storage facilities.

20. Based on my training and experience, and the training and experience of other agents, I also know that conspirators in a financial scheme often keep separate sets of books to record the transfer of funds into and out of the conspiracy and to keep track of how the proceeds are distributed among and between the conspirators.

21. Based on the number of documents created in support of the above-referenced mortgage applications, there is probable cause to believe that there would be evidence of, the fruits, of, or instrumentalities of the crimes being investigated in this case in the Residence.

22. Given that the documents created for the above-referenced mortgage applications were created on computers, there is probable cause to believe that there will be records or data on personal, business, and office computers that constitute evidence of, fruits of, or instrumentalities of criminal violations.

23. Individuals involved in financial crime create such documents, records, and information by various means, including, but not limited to, computers, printers, telex machines, facsimile machines, and telephones, telephone answering machines, cellular phones, and cameras. These individuals also maintain such documents, records, and information in various forms, including but not limited to, electrical, magnetic, photographic, and tangible.

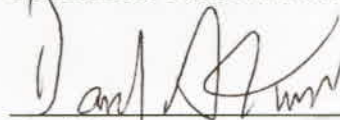
#### IV. CONCLUSION

24. Based on the information outlined above, there is probable cause to believe that **RICHARDSON, D'VON** and **MELVA** have committed the offense of conspiracy to commit wire fraud, in violation of 18 U.S.C. § 1349.

25. Based on the information outlined above, there is probable cause to believe that the Residence contains evidence, fruits and instrumentalities of the offense of conspiracy to commit wire fraud, in violation of 18 U.S.C. § 1349.

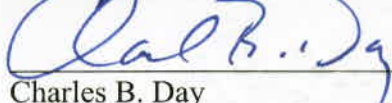
26. Your affiant respectfully requests that: (1) criminal complaints be issued for the above-referenced defendants, as prayed; (2) a search warrant be issued for the Residence, as prayed.

FURTHER YOUR AFFIANT SAYETH NOT.



David Timm  
Special Agent  
Federal Reserve Board - Office of Inspector General

Sworn and subscribed to this 8th day of April 2010.



Charles B. Day  
United States Magistrate Judge  
District of Maryland