

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
08-60165 CR-DIMITROULEAS ~~ROSENBAUM~~
Case No. _____

18 U.S.C. §152
18 U.S.C. §371
18 U.S.C. §1341
18 U.S.C. §1343
18 U.S.C. §2
18 U.S.C. §3237(a)

UNITED STATES OF AMERICA,

Plaintiff,

v.

ANTHONY DEHANEY,
a/k/a Ewart Dehaney,
a/k/a Ewart Anthony Dehaney,
ANDREA ANGELA DEHANEY,
a/k/a Andrea Dehaney,
a/k/a Angela Ricketts,
a/k/a Angela Burke,
HOWARD GAINES,
MARCIA MESTRE,
ANGELA MANALAYSAY,
BEVERLY IRELAND, and
DONNA GRANT,
a/k/a Donna Patricia Grant,

Defendants. /

INDICTMENT

The Grand Jury Charges:

GENERAL ALLEGATIONS

At times relevant to this Indictment:

FILED BY
2008 JUL 17 PM 1:50
SOUTHERN DISTRICT OF FLORIDA

1. The following entities were engaged in the business of mortgage lending in the State of Florida:

- a) Aames Home Loan of America, Inc., was a mortgage lender located in Los Angeles, California.
- b) Bank First was an FDIC insured bank located in Winter Park, Florida.
- c) First NLC Financial Services, LLC, was a mortgage lender located in Deerfield Beach, Florida.
- d) Wachovia Mortgage Corporation was a mortgage lender located in Charlotte, North Carolina.
- e) New Century Mortgage Corporation was a mortgage lender located in Irvine, California.
- f) Long Beach Mortgage Company was a mortgage lender located in Anaheim, California.
- g) Argent Mortgage Company, LLC, was a mortgage lender located in Orange, California.
- h) Countrywide Home Loans, Inc., was a mortgage lender located in Calabass, California.
- i) People's Choice Home Loan, Inc., was a mortgage lender located in Irvine, California.
- j) First Magnus Financial Corporation was a mortgage lender located in Tucson, Arizona.

- k) Loan Correspondents Inc. was a mortgage lender located in Costa Mesa, California.
 - l) South Trust Mortgage Corporation was a mortgage lender which merged into Wachovia Bank.
 - m) Meritage Mortgage Corporation was a mortgage lender located in Jacksonville, Florida.
 - n) Novelle Financial Services was a mortgage lender located in Laguna Hills, California.
 - o) Wells Fargo Bank was an FDIC insured bank located in San Francisco, California.
2. The following entities were incorporated or doing business in the State of Florida:
- a) On August 15, 2000, Zone Entertainment USA, Inc., was incorporated in the State of Florida.
 - b) On December 12, 2000, Bears Music Entertainment, Inc., was incorporated in the State of Florida.
 - c) On December 4, 2001, Pineapple Entertainment, Inc., was incorporated in the state of Florida.
 - d) On April 22, 2002, Mystic Touch, Inc., was incorporated in the State of Florida.
 - e) On April 29, 2004, a fictitious name form in the name of Philhart Investments Inc. was filed in the State of Florida.

- f) On April 29, 2004, a fictitious name form in the name of Tharildas Building Consultants and Remodeling, Inc., was filed in the State of Florida.
 - g) On October 18, 2005, Jemelia Holdings, Inc., was incorporated in the State of Florida.
 - h) On April 10, 2006, Anand Entertainment, Inc., was incorporated in the State of Florida.
 - i) Your Title Choice, Inc., was incorporated in the State of Florida on January 14, 2000, and was located at 6261 NW 6th way, Suite 201, Fort Lauderdale, Florida, and later at 1701 West Hillsborough Blvd., Suite 400, Deerfield Beach, Florida. Your Title Choice, Inc., was a licensed title company located in Fort Lauderdale, Florida, handling escrow and real estate closings for mortgage lenders.
3. The following bank accounts were located in Broward County, Florida:
- a) On or about August 1, 2002, Mystic Touch, Inc., 10240-B, West Sample Road, Coral Springs, Florida, opened a bank account ending in ... 2762 at Bank Atlantic reflecting Ewart A. Dehaney as the Secretary of the corporation.
 - b) On or about July 7, 2003, Mystic Touch, Inc. DBA G.J.T.. Music, 7202 Southgate Blvd, North Lauderdale, Florida, opened a bank account ending in ... 1596 at One United Bank in Lauderdale Lakes, Florida.

- c) On or about October 15, 2003, defendant ANTHONY DEHANEY, as President, opened a bank account ending in ... 9324 at SunTrust Bank in the name of Zone Entertainment USA Inc.
- d) On or about April 1, 2004, defendant ANTHONY DEHANEY, as President, opened a bank account ending in ...1069 at SunTrust Bank in the name of Zone Entertainment USA Inc.
- e) On or about May 25, 2004, defendant ANTHONY DEHANEY, as President, opened a bank account ending in ...7688 at SunTrust Bank in the name of Zone Entertainment USA Inc. D/B/A Tharildas Building Consultants and Remodeling Inc.
- f) On or about June 3, 2004, defendant ANTHONY DEHANEY, as President, opened a bank account ending in ... 7852 at SunTrust Bank in the name of Zone Entertainment USA Inc./ Philhart Investment Inc.
- g) On or about May 10, 2005, an account in the name of Andrea Dehaney was opened at SunTrust Bank, ending in ... 3490.
- h) On or about August 2, 2004, defendant ANTHONY DEHANEY, as President, opened a bank account ending in ... 9627 at SunTrust Bank in the name of Zone Entertainment USA Inc., 5191 NW 15th Street, Margate, Florida.
- i) On or about June 21, 2005, defendant ANDREA DEHANEY as President of Zone Entertainment USA, Inc. D/B/A Philhart Investment, Inc., opened a bank account ending in ... 1319 at Bank Atlantic in Florida.

- j) On or about June 21, 2005, Zone Entertainment USA, Inc., D/B/A Tharildas Building Consultants, opened a bank account ending in ... 1630 at Bank Atlantic in Florida.
- k) On or about June 21, 2005, defendant ANTHONY DEHANEY as the Secretary of Zone Entertainment USA, Inc., opened a bank account ending in ... 1663 at Bank Atlantic in Florida.
- l) On or about March 13, 2006, defendant ANTHONY DEHANEY caused to be opened a bank account ending in ... 4650 at SunTrust Bank in the name of Pineapple Entertainment, Inc., D/B/A The Music House, reflecting M.H. as President and defendant MARCIA MESTRE as Accountant.
- m) On or about March 13, 2006, defendant ANTHONY DEHANEY caused to be opened a bank account ending in ... 4635 at SunTrust Bank in the name of Pineapple Entertainment, Inc., reflecting M.H. as President and defendant MARCIA MESTRE as Accountant.
- n) On or about March 13, 2006, defendant ANTHONY DEHANEY caused to be opened a bank account ending in ... 4668 at SunTrust Bank in the name of Pineapple Entertainment, Inc., D/B/A The Matrix Recording Studio, reflecting M.H. as President.
- o) From on or about January 1, 2005, Your Title Choice, Inc., had an escrow bank account ending in ... 6363 at Union Bank/Colonial Bank.
- p) From on or about April 19, 2005, Your Title Choice, Inc. had a Special Account checking account ending in ... 5486 at SunTrust Bank.

q) From on or about May 31,2005, Your Title Choice, Inc., had an escrow bank account ending in ... 5478 at SunTrust Bank.

4. On or about October 31, 2005, defendant ANTHONY DEHANEY filed an application for Post Office Box 770398, at the West Atlantic Branch Post Office, 8801 West Atlantic Boulevard, Coral Springs, Florida, in the name of Zone Entertainment, reflecting the name of person applying as, Ewart Anthony Dehaney, 8140 S.W. 7th Court, North. Lauderdale, Florida 33068.

COUNT ONE - CONSPIRACY

5. Beginning in or about December 2002, and continuing to the present date, in Broward County in the Southern District of Florida, and elsewhere, the defendants,

ANTHONY DEHANEY,
a/k/a Ewart Dehaney,
a/k/a Ewart Anthony Dehaney,
ANDREA ANGELA DEHANEY,
a/k/a Angela Dehaney,
a/k/a Angela Ricketts,
a/k/a Angela Burke
HOWARD GAINES,
MARCIA MESTRE,
BEVERLY IRELAND,
DONNA GRANT,
a/k/a Donna Patricia Grant,

and others known and unknown to the Grand Jury, did knowingly and willfully combine, conspire, confederate, and agree to commit offenses against the United States of America, that is:

a. to knowingly and willfully devise a scheme and artifice to defraud and to obtain money and property from others by means of materially false and fraudulent pretenses, representations and promises, and for the purpose of executing such scheme and artifice and attempting to do so, to place and cause to be placed, in a post office and authorized depository for mail matter, to be

delivered by the U.S. Postal Service, and to deposit and cause to be deposited certain matters and things, to be sent and delivered by a private and commercial interstate carrier, in violation of Title 18, United States Code, Section 1341; and

b. to knowingly and willfully devise a scheme and artifice to defraud and to obtain money and property from others by means of materially false and fraudulent pretenses, representations and promises, and for the purpose of executing such scheme and artifice and attempting to do so, to transmit and cause to be transmitted by means of wire communication in interstate commerce, certain writings, signals, pictures and sounds, in violation of Title 18, United States Code, Section 1343.

OBJECT OF THE CONSPIRACY

The object of the conspiracy was as follows:

6. The defendants, ANTHONY DEHANEY, ANDREA DEHANEY, HOWARD GAINES, MARCIA MESTRE, BEVERLY IRELAND, DONNA GRANT, and others sought to unlawfully enrich themselves by submitting, causing to be submitted, and aiding and abetting the submission of false and fraudulent mortgage applications and related documents to mortgage lenders, thereby inducing the mortgage lenders to fund mortgages on properties located in Broward County, Florida, allowing defendants to fraudulently obtain ownership and control of these properties with mortgages exceeding over \$10,000,000.

MANNER AND MEANS OF THE CONSPIRACY

7. The manner and means by which the defendants sought to accomplish the object of the conspiracy included the following:

8. Defendants ANTHONY DEHANEY and ANDREA DEHANEY fraudulently caused real property in Broward County, Florida, to be bought and sold through the use of strawbuyers, duped individuals, and corporations or entities controlled by him.

9. As part of the mortgage lending process, defendant ANTHONY DEHANEY, as the leader of this scheme and artifice to defraud, submitted and caused to be submitted to lenders fraudulent Uniform Residential Loan Applications (Form 1003), Request for Verification of Employment (Form 1005), Request for Verification of Deposit (Form 1006), IRS Form W-2's, payroll stubs, earning statements and any other information, as required by the lenders in the borrowers' names through a mortgage broker or directly to the lender for review and loan approval.

10. Once the loan was approved by the lender, a closing on the property was scheduled. At the closing, a closing agent, usually a title company acting for the lender, was required to prepare a Settlement Statement (Form HUD 1) showing the funds paid in by the borrower and funds due to the seller and closing costs and expenses. Also reflected on the HUD-1 were the prorations, escrow deposits, mortgage amounts and obligations to be satisfied. The closing agent would collect any additional funds due from the borrower at the closing and disburse funds due to the seller. The borrower and seller would sign the appropriate legal documents, including the warranty deed, note, mortgage and lender disclosure documents. The closing agent would issue a final title policy to the borrower and lender showing the new owner, legal description, mortgage amount and exceptions to the policy. Upon completion of the closing, the closing agent would forward, usually by mail or private carrier, the signed documents as required by the lender from the closing to the lenders office and file the deed and mortgage in the land records of Broward County, Florida.

11. Defendant ANTHONY DEHANEY used the names of strawbuyers and duped individuals on fraudulent applications sent to lenders, when, in fact, defendant ANTHONY DEHANEY knew these alleged borrowers had no interest or intent to be the true borrower/owner or occupant of the property.

12. Under false and fraudulent pretenses, defendant ANTHONY DEHANEY would knowingly submit and cause to be submitted these false and fraudulent applications to various mortgage lenders in order to fraudulently procure mortgage financing for the borrowers. The mortgage lenders would rely on these applications and forms in approving the loans and upon approval and just prior to the closing, would fund these loans by sending their funds by either check or wire transfers to the bank accounts of a closing/settlement agent.

13. Under false and fraudulent pretenses, defendant ANTHONY DEHANEY owned or controlled real property in Broward County, Florida, and fraudulently obtained substantial funds in connection with these fraudulently obtained mortgage loans.

14. On some loans, defendant ANTHONY DEHANEY created and caused to be created false bank account statements or Verifications of Deposit Forms in the names of the buyers, making the accounts fraudulently reflect high balances to the lenders.

15. Defendant ANTHONY DEHANEY caused defendant MARCIA MESTRE to create and furnish fraudulent wage stubs/earning statements and W-2 forms in the names of the defendants DONNA P. GRANT, BEVERLY IRELAND and individuals identified by the initials K.T., J.B., K.K., R.H., and others to the defendant ANTHONY DEHANEY. These fraudulent documents were used by defendant ANTHONY DEHANEY as part of the fraudulent mortgage applications sent to

the mortgage lenders. Defendant MARCIA MESTRE also fraudulently signed other documents in the name of or for the strawbuyers in the furtherance of the scheme.

16. Defendant ANTHONY DEHANEY also caused to be created fraudulent letters of explanation and down payments to the mortgage lenders in the names of the strawbuyers.

17. Defendant ANTHONY DEHANEY caused the fraudulent mortgage loan application files to be submitted for approval to the lenders. Defendant ANTHONY DEHANEY caused these loan files and other documents to be sent to the various lenders using the U.S. Postal Service and private or commercial interstate carriers.

18. Defendant ANTHONY DEHANEY would purchase, or cause to be purchased in the names of the borrowers, cashier checks or official bank checks, to be presented as closing proceeds due from the borrower, as reflected at Line 303 of the HUD 1 Form, creating the false appearance that these checks/funds were coming from the buyers and not from accounts or funds controlled by defendant ANTHONY DEHANEY.

19. Following the closing, defendant ANTHONY DEHANEY would cause to be created on some properties Quit Claim Deeds to be filed in the land records of Broward County, Florida, conveying the real property from the strawbuyers to defendant ANTHONY DEHANEY and/ or to an entity controlled by defendant ANTHONY DEHANEY. Defendant ANTHONY DEHANEY on some properties would then place tenants in these houses and collect rent from the tenants.

20. Defendant ANTHONY DEHANEY fraudulently induced individuals identified by the initials M.H., L.H., D.G., R.H., J.B., and K.K. to buy properties in Broward County, Florida in their names.

21. Defendant ANTHONY DEHANEY caused fraudulent mortgage applications and related documents to be sent to mortgage lenders in the names of defendants, BEVERLY IRELAND, DONNA GRANT, and individuals identified by the initials M.H., L.H., D.G., R.H., J.B., K.K. and K.T., which the lenders relied on as being truthful and correct.

22. Defendants ANTHONY DEHANEY and ANDREA DEHANEY paid K.T. to be a strawbuyer and submitted fraudulent mortgage applications in K.T.'s name to mortgage lenders on properties in Broward County, Florida, which the lenders relied on as being truthful.

23. Defendant DONNA GRANT aided defendant ANTHONY DEHANEY in the purchase of properties by advancing funds to him which were used in the purchase of real properties.

24. Defendant ANTHONY DEHANEY caused title companies, including Your Title Choice, Inc., and others to act as the closing agent and close the real estate transactions on behalf of the mortgage lenders and caused the title agent to prepare settlement and closing documents including HUD-1 Forms.

25. Defendant ANTHONY DEHANEY caused several bank accounts to be opened at Bank Atlantic, SunTrust Bank, and Union Bank in corporations and other persons names, which he controlled.

26. Defendant ANTHONY DEHANEY on some closings, caused the closing agent prior to the actual closing to issue a check based on the funding proceeds received by the closing agent from the lender. This check was then negotiated at a local bank and used to purchase official bank checks. These official bank checks purchased were then returned to the closing and used fraudulently at the actual closing at the title company to demonstrate "proof" of the down payment as required by the contract and/ or funds due to close by the borrower at Line 303 on the HUD-1.

27. On other occasions, defendant ANTHONY DEHANEY would purchase official bank checks by using his controlled companies in the name of the strawbuyers as remitters of the funds to fraudulently cover the down payments or funds brought to closing at Line 303 on the HUD-1 in the name of the strawbuyer.

28 Defendant ANTHONY DEHANEY, in order to keep control of some of the properties, would make monthly mortgage payments to the mortgage lenders in the names of the strawbuyers by using checks bearing the strawbuyers names. These checks actually were written on checking accounts in his companies' names, but the actual checks were printed to reflect the name of the strawbuyers, but were charged back to defendant ANTHONY DEHANEY's companies bank accounts.

29. At some closings, defendant ANTHONY DEHANEY paid for the homeowners insurance on the houses the strawbuyers were buying.

30. In 2006, defendant ANTHONY DEHANEY put together a fraudulent mortgage application in the name of a title company employee and fraudulently obtained a mortgage in the employee's name in order for the employee to be able to purchase a house in Broward County, Florida.

31. Defendant ANTHONY DEHANEY filed forged and false Bankruptcy Petitions under Chapter 13 in the names of L.H., M.W. and D.G. in the Clerk's Office of the United States Bankruptcy Court, 299 East Broward Blvd. Fort Lauderdale, Florida in order to delay and stop lenders from seeking to foreclose on property in their names.

32. Defendant ANTHONY DEHANEY also caused the settlement agents at some closings to issue checks or wire transfers to entities controlled by defendant ANTHONY DEHANEY as part

of a "cash out scheme" or "fee scheme," where defendant ANTHONY DEHANEY while neither the actual seller or borrower/purchaser of the property, fraudulently received proceeds/fund as the result of the sale.

33. Defendant HOWARD GAINES operated Your Title Choice, Inc. in Fort Lauderdale, Florida as a escrow and real estate closing/ settlement agent for mortgage lenders. Your Title Choice, Inc. was paid "closing fees" by the mortgage lenders to act as the settlement agent for the lenders. Defendant HOWARD GAINES also was paid "fees" at these closings. Defendant HOWARD GAINES had a financial interest in the amount of closings taking place at Your Title Choice, Inc. As the settlement agent for the mortgage lenders, defendant HOWARD GAINES had a fiduciary responsibility to the mortgage lenders to hold the borrowed loan funds in a trust/escrow account. Defendant HOWARD GAINES was required to disburse and collect all necessary funds to be accounted for at the closings and to prepare the HUD-1 Settlement Statements at the closing as well as any other documents required by the mortgage lenders instructions, to be signed and executed at the closings.

34. Defendant HOWARD GAINES and Your Title Choice, Inc. as part of the scheme, accepted checks/funds to hold in escrow from entities controlled by defendant ANTHONY DEHANEY on properties that neither DEHANEY'S companies or defendant ANTHONY DEHANEY had an interest in as the seller or actual borrower/purchaser.

35. Defendant HOWARD GAINES issued Your Title Choice, Inc. checks to defendant ANTHONY DEHANEY or his entities through a checking account called the "Special Account".

36. Defendant HOWARD GAINES through the use of Your Title Choice 's escrow accounts, collected funds from mortgage lenders on loans fraudulently generated by defendant,

ANTHONY DEHANEY. As part of the scheme and artifice to defraud defendant HOWARD GAINES fraudulently caused Your Title Choice escrow checks to be issued from incoming lender funds to be used to buy official bank checks and or cashiers checks in the name of borrowers. Defendant HOWARD GAINES then knowingly allowed these bank checks to be brought back to the closings and presented fraudulently as funds from the borrowers, thereby fraudulently representing to the mortgage lenders that these funds, at Line 303 on the HUD-1 Settlement Forms, were funds belonging to the borrowers.

37. More than 25 of the loans submitted and caused to be submitted to mortgage lenders by defendant ANTHONY DEHANEY were false and fraudulent in some material fashion. The aggregate dollar amount of all loans procured fraudulently by defendant ANTHONY DEHANEY from the mortgage lenders exceeded \$10,000,000.

Overt Acts

38. In furtherance of the conspiracy and to effect the object thereof, at least one of the following overt acts, among others, was committed by at least one of the conspirators in the Southern District of Florida and elsewhere:

39. 8120 SW 7th Court, North Lauderdale, Florida

A. On or about December 11, 2002, defendant ANTHONY DEHANEY caused a contract for sale in the amount of \$119,000.00 to L.H. as purchaser to be signed, on the property located at 8120 SW 7th Court, North Lauderdale, Florida.

B. On or about January 29, 2003, defendant ANTHONY DEHANEY caused a warranty deed to be executed conveying said property located at 8120 SW 7th Court, North Lauderdale, Florida, to L.H.

C. On or about May 9, 2003, defendant ANTHONY DEHANEY caused a Quit Claim Deed to be prepared and signed conveying 8120 SW 7th Court, North Lauderdale, Florida from L.H. to Philhart Investment.

D. On or about March 22, 2004, defendant ANTHONY DEHANEY in the name of Philhart Investments, signed a contract to sell 8120 SW 7th Court, North Lauderdale, Florida to J. S. in the amount of \$145,900.00.

E. On or about May 25, 2004, defendant ANTHONY DEHANEY caused Southtrust Mortgage Corporation to wire transfer \$144,992.50 to Township Land & Title, Inc., in Lauderhill, Florida bank account at Mellon United National Bank.

F. On or about May 25, 2004, defendant ANTHONY DEHANEY caused a real estate closing to take place at Township Land & Title, Inc., in Lauderhill, Florida.

G. On or about May 25, 2004, defendant ANTHONY DEHANEY issued a Zone Entertainment USA Inc. Check number 095, drawn on SunTrust Bank account ending in 7688, in the amount of \$3000.00, payable to Township Land & Title.

H. On or about May 25, 2004, defendant ANTHONY DEHANEY caused a warranty deed to be executed conveying 8120 SW 7th Court, North Lauderdale, Florida, to J.S.

I. On or about May 25, 2004, defendant ANTHONY DEHANEY caused Township Land & Title, Inc. to issue check number 3317 payable to "Anthony Dehaney" in the amount of \$7,908.20.

J. On or about May 25, 2004, defendant ANTHONY DEHANEY caused Township Land & Title, Inc. to mail via UPS #A554-571-657-9, a package containing the post

closing documents to SouthTrust Mortgage Corporation, 210 Wildwood Parkway, Birmingham, Alabama 35209.

K. On or about July 2, 2004, defendant ANTHONY DEHANEY caused a Quit Claim Deed dated May 9, 2003, in the name of Philhart Investments, to be filed in the land records of Broward County, Florida.

40. 2876 Crestwood Terrace, Margate, Florida

A. On or about December 22, 2002, defendant ANTHONY DEHANEY caused a contract for sale in the amount of \$191,000.00 to D.G. as purchaser to be signed, on the property located at 2876 Crestwood Terrace, Margate, Florida.

B. On or about January 31, 2003, defendant ANTHONY DEHANEY caused Countrywide Loans Inc. to send \$169,736.87 to Preferred Land Title of Coral Springs, in Coral Springs, Florida.

C. On or about January 31, 2003, defendant ANTHONY DEHANEY caused a real estate closing to take place at Preferred Land Title of Coral Springs, in Coral Springs, Florida.

D. On or about January 31, 2003, defendant ANTHONY DEHANEY caused to be prepared a false Uniform Residential Loan Application (Form 1003) in the name of D.G. as the borrower.

E. On or about January 31, 2003, defendant ANTHONY DEHANEY caused a warranty deed to be executed conveying said property located at 2876 Crestwood Terrace, Margate, Florida, to D.G..

F. On or about January 31, 2003, defendant ANTHONY DEHANEY caused a warranty deed in the name of D.G. to be filed in the land records of Broward County, Florida.

G. On or about February 4, 2003, defendant ANTHONY DEHANEY caused funds in the amount of \$24,888.08 in the name of D.G. to be brought to the closing.

H. On or about September 5, 2006, defendant ANTHONY DEHANEY filed a forged and fraudulent Chapter 13 Petition, case Number 06-14298-RBR, in the name of D.G. at the Clerks Office at the U.S. Bankruptcy Court, 299 East Broward Blvd., Fort Lauderdale, Florida.

41. 6366 NW 39th Street, Coral Springs, Florida

A. On or about December 29, 2002, defendant ANTHONY DEHANEY signed a contract on behalf of Jemelia Investments Inc. to purchase the property located at 6366 NW 39th Street, Coral Springs, Florida, for \$200,000.00.

B. On or about February 4, 2003, defendant ANTHONY DEHANEY caused an assignment of contract sale to L.H. as purchaser to be signed, on the property located at 6366 NW 39th Street, Coral Springs, Florida, in the amount of \$197,000.00.

C. On or about March 11, 2003, defendant ANTHONY DEHANEY caused a warranty deed conveying said property located at 6366 NW 39th Street, Coral Springs, Florida, to L.H. to be filed in the land records of Broward County, Florida.

D. On or about May 9, 2003, defendant ANTHONY DEHANEY caused a Quit Claim Deed to be signed in the name of L.H., conveying 6366 NW 39th Street, Coral Springs, Florida, this property to Anand Entertainment, Inc.

E. On or about December 15, 2003, defendant ANTHONY DEHANEY caused the Quit Claim Deed, conveying 6366 NW 39th Street, Coral Springs, Florida to Anand Entertainment., Inc., to be filed in the land records of Broward County, Florida.

F. In or about April 2004, defendant ANTHONY DEHANEY caused a contract for sale between Anand Entertainment and M.W. as purchaser to be signed on the property located at 6366W 39th Street, Coral Springs, Florida, in the amount of \$230,000.00.

G. On or about April 29, 2004, defendant ANTHONY DEHANEY caused Zone Entertainment USA, Inc. to issue check number 1041, drawn on SunTrust Account ending in 1069, to Township Title in the amount of \$45,000.00.

H. On or about May 14, 2004, defendant ANTHONY DEHANEY caused to be prepared a false Verification of Rent Form in the name of M.W. as the borrower.

I. On or about May 20, 2004, defendant ANTHONY DEHANEY caused to be prepared false wage stubs and W-2 forms in the name of M.W. as the borrower.

J. On or about May 20, 2004, defendant ANTHONY DEHANEY caused a real estate closing to take place at Township Land & Title, Inc., Lauderhill, Florida.

K. On or about May 20, 2004, defendant ANTHONY DEHANEY caused to be signed a false Uniform Residential Loan Application (Form 1003) in the name of M.W. as the borrower at the closing.

L. On or about May 20, 2004, defendant ANTHONY DEHANEY caused Township Land & Title, Inc. to issue check 3315, payable to Anand Entertainment Inc. in the amount of \$19,970.82.

M. On or about May 20, 2004, defendant ANTHONY DEHANEY caused Township Land & Title, Inc. to issue check 3251, payable to Anand Entertainment Inc. in the amount of \$20,171.87.

N. On or about May 20, 2004, defendant ANTHONY DEHANEY caused a bank check in the amount of \$2,888.14 to be brought to the closing.

O. On or about May 20, 2004, defendant ANTHONY DEHANEY caused a warranty deed to be executed conveying said property located at 6366 NW 39th Street, Coral Springs, Florida, to M.W.

P. On or about May 21, 2004, defendant ANTHONY DEHANEY caused a warranty deed in the name of M.W. to be filed in the land records of Broward County, Florida.

Q. On or about March 22, 2006, defendant ANTHONY DEHANEY filed a forged and fraudulent Chapter 13 Petition, in case Number 06-11000-RBR, in the name of M.W., at the Clerks Office at the U.S. Bankruptcy Court, 299 East Broward Blvd., Fort Lauderdale, Florida.

R. On or about October 29, 2007, defendant ANTHONY DEHANEY filed a forged and fraudulent Chapter 13 Petition, case Number 07-19210-RBR, in the name of M.W., at the Clerks Office at the U.S. Bankruptcy Court, 299 East Broward Blvd., Fort Lauderdale, Florida.

42. 5658 East Leitner Drive, Coral Springs, Florida

A. On or about February 2, 2003, defendant ANTHONY DEHANEY caused a contract for sale in the amount of \$1,200,000.00 to L.H. as purchaser to be signed, on the property located at 5658 East Leitner Drive, Coral Springs, Florida.

B. On about March 7, 2003, defendant ANTHONY DEHANEY caused a real estate closing to take place at SuRealty Title, Inc., in Davie, Florida.

C. On or about April 16, 2003, defendant ANTHONY DEHANEY caused a warranty deed to be executed conveying said property located at 5658 East Leitner Drive, Coral Springs, Florida, to L.H.

D. On or about April 16, 2003, defendant ANTHONY DEHANEY caused a warranty deed in the name of L.H. to be filed in the land records of Broward County, Florida.

E. On or about May 9, 2003, defendant ANTHONY DEHANEY caused a fraudulent Quit Claim deed to be prepared conveying the property known a 5658 East Leitner Drive, Coral Springs, Florida, from L.H. to ANAND ENTERTAINMENT.

F. On or about December 15, 2003, defendant ANTHONY DEHANEY caused a forged Quit Claim Deed bearing the signature of L.H. to be filed in the land records of Broward County, Florida.

G. On or about April 13, 2005, defendant ANTHONY DEHANEY caused to be filed a forged Chapter 13 Petition, in case number 05-22052, in the name of L.H. at the clerks office of the Bankruptcy Court at 299 East Broward Blvd, Fort Lauderdale, Florida.

H. On or about February 28, 2006, defendant ANTHONY DEHANEY caused a contract for sale from Anand Entertainment to M.H. as purchaser to be signed, on the property located at 5658 East Leitner Drive, Coral Springs, Florida, in the amount of \$1,400,000.00.

I. On or about March 10, 2006, defendant ANTHONY DEHANEY caused to be prepared a false Uniform Residential Loan Application (Form 1003) in the name of M.H. as the borrower.

J. On or about March 10, 2006, defendant ANTHONY DEHANEY caused to be prepared a false Form 1003 in the name of M.H. as the borrower.

K. On or about April 9, 2006, defendant ANTHONY DEHANEY caused to be prepared a false Verification of Deposit Form from Citizens Bank of Massachusetts, in the name of M.H. as the borrower reflecting bank balances of \$25,016.57.

L. On or about April 12, 2006, defendant ANTHONY DEHANEY caused Bank First to wire transfer \$347,260.95 to the Your Title Choice escrow account ending in 5478 at SunTrust Bank.

M. On or about April 12, 2006, defendant ANTHONY DEHANEY caused Bank First to wire transfer \$1,049,333.97 to the Your Title Choice escrow account ending in 5478 at SunTrust Bank.

N. On or about April 12, 2006, defendant ANTHONY DEHANEY caused a real estate closing to take place at Your Title Choice, Inc., in Fort Lauderdale, Florida.

O. On or about April 12, 2006, defendant ANTHONY DEHANEY caused a warranty deed to be executed conveying said property located at 5658 East Leitner Drive, Coral Springs, Florida, to M.H.

P. On or about April 12, 2006, defendant ANTHONY DEHANEY caused Your Title Choice to issue check number 36332 in the amount of \$60,000.00 payable to the defendant ANTHONY DEHANEY.

Q. On or about April 13, 2006, defendant ANTHONY DEHANEY caused to be purchased a SunTrust Official Bank Check #073030977 in the amount of \$40,244.32, payable to Your Title Choice, remitter M.H.

R. On or about April 13, 2006, defendant ANTHONY DEHANEY caused Your Title Choice to mail the post closing documents via Fedex 791444725051 to BankFirst Att: Post Closing, 2600 West 49th Street, Sioux Falls, SD 576105.

S. On or about April 26, 2006, defendant ANTHONY DEHANEY caused a warranty deed in the name of M.H. to be filed in the land records of Broward County, Florida.

43. 1224 NE 2nd Avenue, Fort Lauderdale, Florida

A. On or about January 28, 2005, defendant ANTHONY DEHANEY caused a contract for sale in the amount of \$475,000.00 to be signed in the name of K.K. as purchaser, on the property located at 1224 NE 2nd Avenue, Fort Lauderdale, Florida.

B. On or about February 2, 2005, defendant ANTHONY DEHANEY caused to be prepared false earning statements in the name of K.K. as the borrower.

C. On or about February 2, 2005, defendant ANTHONY DEHANEY caused to be prepared false W-2 forms in the name of K.K. as the borrower

D. On or about February 14, 2005, defendant ANTHONY DEHANEY caused the Peoples Choice Home Loan, Inc. to wire transfer \$426,916.15 to a Your Title Choice bank account in Florida.

E. On or about February 14, 2005, defendant ANTHONY DEHANEY caused a real estate closing to take place at Your Title Choice, Inc., in Fort Lauderdale, Florida.

F. On or about February 14, 2005, defendant ANTHONY DEHANEY caused a false Uniform Residential Loan Application (Form 1003) in the name of K.K. as the borrower to be signed at the closing.

G. On or about February 14, 2005, defendant ANTHONY DEHANEY caused a Washington Mutual Bank Official Check, number 096151990, reflecting K.K. as Remitter, in the amount of \$36,000.00, to be brought to the closing.

H. On or about February 14, 2005, at the closing defendant ANTHONY DEHANEY caused Your Title Choice to issue check number 47496, payable to Anthony Dehaney, in the amount of \$5,250.00.

I. On or about February 14, 2005, defendant ANTHONY DEHANEY caused a warranty deed to be executed conveying said property located at 1224 NE 2nd Avenue, Fort Lauderdale, Florida, to K.K.

J. On or about February 13, 2006, defendant ANTHONY DEHANEY caused a contract for sale in the amount of \$560,000.00 to M.H. to be signed as purchaser, on the property located at 1224 NE 2nd Avenue, Fort Lauderdale, Florida.

K. On or about March 13, 2006, defendant ANTHONY DEHANEY caused to be prepared a false Uniform Residential Loan Application (Form 1003) in the name of M.H. as the borrower.

L. On or about February 15, 2005, defendant ANTHONY DEHANEY caused Your Title Choice to send a Federal Express package, number 790427056913, to Funding Department, Peoples Choice Home Loan, in Irvine, California.

M.. On or about February 22, 2005, defendant ANTHONY DEHANEY caused a warranty deed in the name of K.K. to be filed in the land records of Broward County, Florida.

N. On or about March 10, 2006, defendants ANTHONY DEHANEY and MARCIA MESTRE caused to be prepared a false Verification of Employment Form in the name of M.H. as the borrower.

O. On or about April 3, 2006, defendant ANTHONY DEHANEY caused a false Verification of Deposit Form in the name of M.H. to be given to the mortgage broker.

P. On or about April 14, 2006, defendant MARCIA MESTRE falsely advised the lender First Magnus Financial Corporation that M.H. was employed at M.A. Aitcheson & Associates.

Q. In or about April 2006, defendant ANTHONY DEHANEY caused false checks to be given to the mortgage broker reflecting M.H. was paying rent of \$1,450.00 a month.

R. On or about April 19, 2006, defendant ANTHONY DEHANEY caused a real estate closing to take place at Your Title Choice, Inc., in Fort Lauderdale, Florida.

S. On or about April 19, 2006, defendant ANTHONY DEHANEY caused a bank check in the amount of \$26,430.34 to be brought to the closing.

T. On or about April 19, 2006, defendant ANTHONY DEHANEY caused a warranty deed to be executed conveying said property located at 1224 NE 2nd Avenue, Fort Lauderdale, Florida, to M.H..

U. On or about May 2, 2006, defendant ANTHONY DEHANEY caused a warranty deed in the name of M.H. to be filed in the land records of Broward County, Florida.

44. 2640 NW 80th Avenue, Margate, Florida

A. On or about March 19, 2005, defendants ANTHONY DEHANEY and BEVERLY IRELAND caused a contract for sale in the in the amount of \$560,000.00 to be signed by defendant BEVERLY IRELAND as purchaser, on the property located at 2640 N.W. 80th Avenue, Margate, Florida.

B. On or about April 18, 2005, defendant BEVERLY IRELAND signed a false Uniform Residential Loan Application (Form 1003) in her name as a borrower.

C. On or about April 20, 2005, defendants ANTHONY DEHANEY and MARCIA MESTRE caused to be prepared false earning statements and W-2 forms in the name of the defendant BEVERLY IRELAND as the borrower.

D. On or about April 28, 2005, defendant ANTHONY DEHANEY caused a real estate closing to take place at Your Title Choice in Fort Lauderdale, Florida..

O E. n or about April 28, 2005, defendant ANTHONY DEHANEY caused a warranty deed to be executed conveying said property located at 2640 NW 80th Avenue, Margate, Florida, to the defendant BEVERLY IRELAND.

F. On or about April 28, 2005, defendants ANTHONY DEHANEY and BEVERLY IRELAND caused a false Uniform Residential Loan Application (Form 1003) in the name of defendant BEVERLY IRELAND to be signed.

G. On or about April 28, 2005, defendant ANTHONY DEHANEY caused a warranty deed in the name of defendant BEVERLEY IRELAND to be filed in the land records of Broward County, Florida.

H. On or about April 29, 2005, defendants, ANTHONY DEHANEY and BEVERLY IRELAND caused Your Title Choice, Inc. to mail the post closing documents to Argent Mortgage Company in Orange, California, via Fedex #792269881335.

45. 1862 NW 86th Terrace Coral Springs, Florida.

A. On or about June 1, 2005, defendant ANTHONY DEHANEY caused a contract for sale in the amount of \$400,000.00 to R.H. to be signed as purchaser, on the property located at 1862 NW 86th Terrace, Coral Springs, Florida.

B. On or about June 1, 2005, defendant ANTHONY DEHANEY signed an Addendum To Deposit and Contract For Sale and Purchase of 1862 NW 86th Terrace, Coral Springs, Florida to have \$4,000.00 paid to Tharilda Building Consultants and Renovations.

C. On or about March 28, 2005, defendant ANTHONY DEHANEY caused false W-2's in the name of R.H. to be prepared.

D. On or about March 28, 2005, defendants ANTHONY DEHANEY and MARCIA MESTRE prepared false earning statements in the name of R.H..

E. On or about June 5, 2005, defendant ANTHONY DEHANEY caused to be issued check number 100, drawn on SunTrust bank account ending in ... 3490, payable to Your Title Choice, in the amount of \$6,000.00, for "Henry 05-1622".

F. On or about June 28, 2005, defendant ANTHONY DEHANEY caused the Wachovia Mortgage Corporation to wire transfer \$315,088.75 from Wachovia Bank NA in Charlotte, NC to a Your Title Choice, Inc., escrow account ending in 5478 at SunTrust Bank in Florida.

G. On or about June 28, 2005, defendant ANTHONY DEHANEY caused a real estate closing to take place at Your Title Choice, in Fort Lauderdale, Florida.

H. On or about June 28, 2005, defendant ANTHONY DEHANEY caused a false Uniform Residential Loan Application (Form 1003), to be signed in the name of R.H. as the borrower.

I. On or about June 29, 2005, defendant ANTHONY DEHANEY caused three Bank of America moneys orders, totaling \$2,185.00, to be brought to the closing.

J. On or about June 28, 2005, defendant ANTHONY DEHANEY caused a warranty deed to be executed conveying said property located at 1862 NW 86th Terrace, Coral Springs, Florida, to R.H.

K. On or about June 28, 2005, defendant ANTHONY DEHANEY caused a warranty deed in the name of R.H. to be filed in the land records of Broward County, Florida.

46. 812 NW 26th Street, Wilton Manors, Florida

A. On or about May 25, 2005, defendant ANTHONY DEHANEY caused a contract for sale in the amount of \$452,000.00 to Philhart Investment as purchaser to be signed, on the property located at 812 NW 26th Street, Wilton Manors, Florida.

B. On or about May 25, 2005, defendant ANTHONY DEHANEY caused an Assignment of Contract for Sale and Purchase to be signed in the name of K.T.

C. On or about May 25, 2005, defendant ANTHONY DEHANEY caused a contract for sale to be signed selling the property from Philhart Investment to K.T. in the amount of \$600,000.00.

D. On or about May 31, 2005, defendant ANTHONY DEHANEY caused a false earning statement to be prepared in the name of K.T. as the borrower.

E. On or about June 3, 2005, defendant ANTHONY DEHANEY caused a false Uniform Residential Loan Application (Form 1003) to be prepared in the name of K.T. as the borrower.

F. On or about June 30, 2005, defendant ANTHONY DEHANEY caused a false W-2 forms to be prepared in the name of K.T. as the borrower.

G. On or about July 5, 2005, defendant ANTHONY DEHANEY caused an Addendum Contract to be signed, in the name of K.T. amending the sales price to \$565,000 and assigning a fee of \$112,209.00 to Philhart Investments.

H. On or about July 4, 2005, defendant ANTHONY DEHANEY authorized Your Title Choice, Inc. to disburse via a wire transfer \$24,200 from the proceeds due Philhart Investments to defendant DONNA PATRICIA GRANT's bank account at SunTrust Bank.

I. On or about July 5, 2005, defendant ANTHONY DEHANEY caused a real estate closing to take place at Your Title Choice, Inc. in Fort Lauderdale, Florida.

J. On or about July 5, 2005, defendant DONNA PATRICIA GRANT issued check number 093, dated June 5, 2005, payable to "Cash" in the amount of \$21,187.00 on SunTrust account ending in 7635 to purchase SunTrust Official check number #0739664594.

K. On or about July 5, 2005, defendants ANTHONY DEHANEY and DONNA PATRICIA GRANT caused SunTrust Bank Official check number 0739664594 in the amount of \$21,187.00 to be brought to the closing.

L. On or about July 5, 2005, defendant ANTHONY DEHANEY caused Bank Atlantic Check #951403760 in the amount of \$606.58 to be brought to the closing.

M. On or about July 5, 2005, defendant ANTHONY DEHANEY caused a Bank Atlantic Check #951402349 in the amount of \$199.00 to be brought to the closing.

N. On or about July 5, 2005, defendant ANTHONY DEHANEY caused a warranty deed to be executed conveying said property located at 812 NW 26th Street, Wilton Manors, Florida, to K.T.

O. On or about July 6, 2005, defendant ANTHONY DEHANEY caused Argent Mortgage to wire transfer \$458,237.66 from Deutsche Bank Trust Co. Americas, New York, N.Y. to a Your Title Choice Escrow account ending in ...5478 at the SunTrust Bank, in Florida.

P. On or about July 6, 2005, defendants ANTHONY DEHANEY and ANDREA DEHANEY caused to be issued Philhart Investment, Inc. Check number 0083, payable to K.T., in the amount of \$ 5,000.00.

Q. On or about July 15, 2005, defendant ANTHONY DEHANEY caused a warranty deed in the name of K.T. to be filed in the land records of Broward County, Florida.

47. 712 NW 26th Street, Wilton Manors, Florida

A. On or about July 10, 2005, defendant ANTHONY DEHANEY caused a contract for sale in the amount of \$422,000.00 to be signed in the name of Philhart Investments and or assigns, as purchaser, on the property located at 712 NW 26th Street, Wilton Manors, Florida.

B. On or about July 13, 2005, defendant ANTHONY DEHANEY caused Zone Entertainment USA Inc. check number 0086 to be issued to Your Title Choice, drawn on the Bank Atlantic account ending in1663, in the amount of \$1,000.00, bearing "For 712 NW 26th St" and the number 05-1985.

C. On or about July 14, 2005, defendant ANTHONY DEHANEY caused an Assignment of Contract for Sale to be signed, conveying the contract from Philhart Investment to K.T., as purchaser, on the property located at 712 NW 26th Street, Wilton Manors, Florida.

D. On or about July 14, 2005, defendant ANTHONY DEHANEY caused a contract for sale in the amount of \$450,000.00 to be signed in the name of K.T., as purchaser, on the property located at 712 NW 26th Street, Wilton Manors, Florida.

E. On or about July 29, 2005, defendant ANTHONY DEHANEY caused false earning statements and W-2 forms to be prepared in the name of K.T. as the borrower.

F. On or about August 5, 2005, defendants ANTHONY DEHANEY and ANDREA DEHANEY caused Philhart Investment, Inc. check number 1024 to be issued to Your Title Choice, drawn on the Bank Atlantic account ending in1319, in the amount of \$27,000.00, bearing the number 05-1985.

G. On or about August 16, 2005, defendant ANTHONY DEHANEY caused Long Beach Mortgage to wire transfer \$365,257.56 to the Your Title Choice, Inc. escrow account ending in 5478 at SunTrust Bank, in Florida.

H. On or about August 16, 2005, defendant ANTHONY DEHANEY caused Long Beach Mortgage to wire transfer \$89,283.68 to the Your Title Choice, Inc. escrow account ending in 5478 at SunTrust Bank, in Florida.

I. On or about August 16, 2005, defendant ANTHONY DEHANEY caused a real estate closing to take place at Your Title Choice, Inc. in Fort Lauderdale, Florida.

J. On or about August 16, 2005, defendant ANTHONY DEHANEY caused a bank check in the amount of \$19,462.12 to be brought to the closing.

K. On or about August 16, 2005, defendant ANTHONY DEHANEY caused a warranty deed to be executed conveying said property located at 712 NW 26th Street, Wilton Manors, Florida.

L. On or about August 17, 2005, defendant ANTHONY DEHANEY caused Your Title Choice, Inc. to send closing documents via Federal express airbill 792503933797 to Postclosing Department Long Beach Mortgage Company, Englewood, Colorado.

M. On or about August 19, 2005, defendant ANTHONY DEHANEY caused Your Title Choice, Inc. to issue check number 20256 in the amount of \$27,804.00 at the closing to Philhart Investments.

N. On or about August 18, 2005, defendant ANTHONY DEHANEY caused Your Title Choice, Inc. to wire transfer \$19,462.12 from the Your Title Choice, Inc. escrow account ending in 5478 to the Philhart Investments bank account at Bank Atlantic ending in ... 1319.

O. On or about September 8, 2005, defendant ANTHONY DEHANEY caused a warranty deed in the name of K.T. to be filed in the land records of Broward County, Florida.

48. 807 NW 26th Street, Wilton Manors, Florida

A. On or about July 12, 2005, defendant ANTHONY DEHANEY caused a contract for sale in the amount of \$410,000.00 to "Philhart Investment and or assigns" as purchaser to be signed, on the property located at 807 NW 26th Street, Wilton Manors, Florida.

B. On or about July 12, 2005, defendant ANTHONY DEHANEY caused a contract for sale in the amount of \$540,000.00 to K.T. as purchaser to be signed, on the property located at 807 NW 26th Street, Wilton Manors, Florida.

C. On or about July 15, 2005, defendant ANTHONY DEHANEY caused an Assignment of Contract for Sale and Purchase to be signed, transferring the interest in the property to K.T.

D. On or about July 13, 2005, defendant ANTHONY DEHANEY caused a Zone Entertainment USA Inc. check, number 0085, drawn on Bank Atlantic account ending in ..1663, to be issued to K.T. as the borrower, payable to Your Title Choice, Inc. in the amount of \$1,000.00, reflecting file 05-1998.

E. On or about July 21, 2005, defendant ANTHONY DEHANEY caused false earning statements to be prepared in the name of K.T.

F. On or about July 26, 2005, defendant ANTHONY DEHANEY caused false W-2's to be prepared in the name of K.T.

G. On or about July 28, 2005, defendant ANTHONY DEHANEY caused Aames Home Loan of America Inc. to wire transfer \$439,332.60 from JP Morgan Chase Bank NA in New

York, New York to the Your Title Choice, Inc. escrow Account ending in5478 at SunTrust Bank, in Florida.

H. On or about July 28, 2005, defendant ANTHONY DEHANEY caused a real estate closing to take place at Your Title Choice, Inc., in Fort Lauderdale, Florida.

I. On or about July 28, 2005, defendant ANTHONY DEHANEY caused a false Uniform Residential Loan Application (Form 1003) to be prepared in the name of K.T. as the borrower.

J. On or about July 28, 2005, defendant ANTHONY DEHANEY caused a Washington Mutual Bank Official check #544450159, payable to Your Title Choice, Inc. in the amount of \$22,600.00, to be brought to the closing.

K. On or about July 28, 2005, defendant ANTHONY DEHANEY caused a Bank Atlantic Official Check #968121587, payable to Your Title Choice, Inc. in the amount of \$1,374.73, to be brought to the closing.

L. On or about July 28, 2005, defendant ANTHONY DEHANEY caused Your Title Choice, Inc. to wire transfer \$130,000 from the Your Title Choice, Inc. escrow account, re file 05-1998, to a Philhart Investments bank account at Bank Atlantic.

M. On or about July 28, 2005, defendant ANTHONY DEHANEY caused a warranty deed to be executed conveying said property located at 807 NW 26th Street, Wilton Manors, Florida, to K.T.

N. On or about July 28, 2005, defendants ANTHONY DEHANEY and ANDREA DEHANEY caused to be issued Philhart Investment, Inc. Check number 1009, payable to K.T., in the amount of \$10,000.00.

O. On or about August 9, 2005, defendant ANTHONY DEHANEY caused a warranty deed in the name of K.T. to be filed in the land records of Broward County, Florida.

49. 4888 NW 99th Lane, Coral Springs, Florida

A. On or about July 8, 2005, defendants ANTHONY DEHANEY and DONNA GRANT caused a contract for sale in the amount of \$555,000.00 to be signed by defendant DONNA GRANT as purchaser, on the property located at 4888 NW 99th Lane, Coral Springs, Florida.

B. On or about July 14, 2005, defendants ANTHONY DEHANEY and DONNA GRANT caused a false Uniform Residential Loan Application (Form 1003) to be prepared in the name of defendant DONNA GRANT as the borrower.

C. On or about July 14, 2005, defendant DONNA GRANT issued check number 095 to Your Title Choice, in the amount of \$1,000.00.

D. On or about July 22, 2005, defendant ANTHONY DEHANEY caused Zone Entertainment Check number 89, payable to Your Title Choice in the amount of \$3000, drawn on Bank Atlantic account ending in 1663.

E. On or about July 15, 2005, defendants DONNA GRANT and ANTHONY DEHANEY caused false earning statements and W-2 forms to be prepared in the name of DONNA GRANT as the borrower.

F. On or about July 29, 2005, defendant ANTHONY DEHANEY caused a real estate closing to take place at Your Title Choice, Inc., in Fort Lauderdale, Florida.

G. On or about July 29, 2005, defendants ANTHONY DEHANEY and DONNA GRANT caused Long Beach Mortgage to wire transfer \$449,515.21 to the Your Title Choice, Inc., escrow account ending in ... 5478 at SunTrust Bank in Florida.

H. On or about July 29, 2005, SunTrust Bank Check #0739398096, dated July 29, 2005, in the amount of \$14,539.27, payable to Your Title Choice was presented at the closing.

I. On or about July 29, 2005, SunTrust Bank Check #0739398105, dated July 29, 2005, in the amount of \$3,000.00, payable to Your Title Choice was presented at the closing.

J. On or about July 29, 2005, defendants ANTHONY DEHANEY and DONNA GRANT caused a warranty deed to be executed conveying the property located at 4888 NW 99th Lane, Coral Springs, Florida.

K. On or about July 29, 2005, defendants ANTHONY DEHANEY and DONNA GRANT caused a false Uniform Residential Loan Application (Form 1003) to be prepared in the name of defendant DONNA GRANT, as the borrower.

L. On or about July 29, 2005, defendants ANTHONY DEHANEY and ANDREA DEHANEY caused to be issued Philhart Investment, Inc. Check number 1013, payable to defendant DONNA GRANT, in the amount of \$25,000.00.

L. On or about August 1, 2005, defendant ANTHONY DEHANEY caused a warranty deed in the name of defendant DONNA GRANT to be filed in the land records of Broward County, Florida.

50. 712 SW 81st Avenue, Unit 7A, North Lauderdale, Florida

A. In or about June 2005, defendant ANTHONY DEHANEY caused property located at 712 SW 81st Avenue, Unit 7A, North Lauderdale, Florida, to be sold to R.H. for \$175,000.00.

B. On or about June 25, 2005, defendant ANTHONY DEHANEY caused a false verification of rent form to be prepared in the name of R.H.

C. On or about June 1, 2005, defendants ANTHONY DEHANEY and MARCIA MESTRE caused false W-2's in the name of R.H. to be prepared as the borrower.

D. On or about July 8, 2005, defendants ANTHONY DEHANEY, and MARCIA MESTRE caused false earning statements to be prepared in the name of R.H. as the borrower.

E. On or about July 21, 2005, defendant ANTHONY DEHANEY caused Novelle Financial Services Inc. to wire transfer approximately \$175,000.00 to the Your Title Choice, Inc. trust account at SunTrust Bank, in Florida ending in 5478.

F. On or about July 21, 2005, defendant ANTHONY DEHANEY caused a real estate closing to take place at Your Title Choice, Inc., in Florida.

G. On or about July 19, 2005, defendant ANTHONY DEHANEY caused a warranty deed to be executed conveying said property located at 712 SW 81st Avenue, Unit 7A, North Lauderdale, Florida, to R.H.

H. On or about July 21, 2005, defendant ANTHONY DEHANEY caused a false Uniform Residential Loan Application (Form 1003) to be signed in the name of R.H. as the borrower.

I. On or about August 4, 2005, defendant ANTHONY DEHANEY caused a Special Warranty Deed for 712 SW 81st Avenue, Unit 7A, North Lauderdale, Florida, to be filed in the land records of Broward County, Florida.

51. 1129 NE 10th Avenue, Fort Lauderdale, Florida

A. On or about June 6, 2005, defendant ANTHONY DEHANEY caused a contract for sale in the amount of \$435,000.00 to be signed in the name of K.T. as purchaser, on the property located at 1129 NE 10th Avenue, Fort Lauderdale, Florida.

B. On or about September 9, 2005, defendant ANTHONY DEHANEY caused false earning statements in the amount of \$435,000.00 to be prepared in the name of K.T. as the borrower.

C. On or about September 9, 2005, defendant ANTHONY DEHANEY caused false IRS W-2 forms to be prepared in the name of K.T. as the borrower.

D. On or about September 9, 2005, defendant ANTHONY DEHANEY caused a false Washington Mutual Bank statement to be prepared in the name of K.T. as the borrower.

E. On or about September 16, 2005, defendant ANTHONY DEHANEY caused a real estate closing to take place at Your Title Choice, Inc., in Fort Lauderdale, Florida.

F. On or about September 16, 2005, defendant ANTHONY DEHANEY caused a false Uniform Residential Loan Application (Form 1003) to be prepared in the name of K.T. as the borrower.

G. On or about September 16, 2005, defendant ANTHONY DEHANEY caused a Your Title Choice, Inc. escrow account check, number 22245, drawn on SunTrust Bank account ending in ... 5478, in the amount of \$55,000, to be issued to Tharildas Building Consultants.

H. On or about September 16, 2005, defendant ANTHONY DEHANEY caused a SunTrust Official bank check #730032048, in the amount of \$16,060.79, payable to Your Title Choice, Inc., to be brought to the closing in the name of K.T.

I. On or about September 16, 2005, defendant ANTHONY DEHANEY caused a warranty deed to be executed, conveying said property located at 1129 NE 10th Avenue, Fort Lauderdale, Florida, to K.T.

J. On or about September 30, 2005, defendant ANTHONY DEHANEY caused a warranty deed in the name of K.T. on 1129 NE 10th Avenue, Fort Lauderdale, Florida, to be filed in the land records of Broward County, Florida.

52. 5200 NW 31st Avenue, #B-36, Fort Lauderdale, Florida

A. On or about July 26, 2005, defendant ANTHONY DEHANEY caused a contract for sale in the amount of \$225,990.00 to M.H. as purchaser to be signed on the property located at 5200 NW 31st Avenue, B-36, Fort Lauderdale, Florida.

B. On or about November 3, 2005, defendant ANTHONY DEHANEY caused a false earnings statement in the name of M.H. to be prepared.

C. On or about October 13, 2005, defendant ANTHONY DEHANEY caused a letter showing employment for M.H. to be created falsely reflecting M.H. was earning \$45,000 a year as a payroll clerk at a firm in Plantation, Florida.

D. On or about November 9, 2005, defendant ANTHONY DEHANEY caused the Wachovia Mortgage Corporation to wire transfer \$216,621.40 to the Your Title Choice Inc. Escrow account at the SunTrust Bank in Florida ending in5478.

E. On or about November 10, 2005, defendant ANTHONY DEHANEY caused a real estate closing to take place at Your Title Choice, Inc. in Fort Lauderdale, Florida.

F. On or about November 10, 2005, defendant ANTHONY DEHANEY caused a false Uniform Residential Loan Application (Form 1003) to be signed in the name of M.H. as the borrower.

G. On or about November 10, 2005, defendant ANTHONY DEHANEY caused a warranty deed to be executed conveying said property located at 5200 NW 31st Avenue, B-36, Fort Lauderdale, Florida, to M.H.

H. On or about November 16, 2005, defendant ANTHONY DEHANEY caused Your Title Choice, Inc. to mail closing documents via Fedex #792582233869 to the Postclosing Department, Wachovia, 111 Corporate Center Drive, Raleigh, North Carolina.

I. On or about November 29, 2005, defendant ANTHONY DEHANEY caused a warranty deed in the name of M.H. to be filed in the land records of Broward County, Florida

53. 1121 NE 10th Avenue, Fort Lauderdale, Florida

A. On or about December 19, 2005, defendant ANTHONY DEHANEY caused an assignment of contract to be signed in the amount of \$455,000.00 from Philhart Investments to J.B., as purchaser, on the property located at 1121 NE 110th Avenue, Fort Lauderdale, Florida.

B. On or about December 30, 2005, defendant ANTHONY DEHANEY caused a false Uniform Residential Loan Application (Form 1003) to be prepared in the name of J.B. as the borrower.

C. On or about December 30, 2005, defendant ANTHONY DEHANEY caused Net Bank in Alpharetta, Georgia. to wire transfer \$366,774.86 to the Your Title Choice, Inc. escrow account ending in ... 5478 at SunTrust Bank in Florida.

D. On or about December 30, 2005, defendant ANTHONY DEHANEY caused a real estate closing to take place at Your Title Choice, Inc. in Fort Lauderdale, Florida.

E. On or about December 30, 2005, defendant ANTHONY DEHANEY caused a SunTrust official bank check #0730385766, in the amount of \$18,925.87, to be brought to the closing in the name of J.B.

F. On or about January 3, 2006, defendant , HOWARD GAINES, issued Your Title Choice escrow check number 29369, drawn on SunTrust Bank in the amount of \$70,000.00, to Philhart Investments, Inc.

G. On or about January 3, 2006, defendant ANTHONY DEHANEY negotiated Your Title Choice, Inc. escrow check number 29369, payable Philhart Investments Inc., and with the proceeds purchased a SunTrust Official bank check number 0730385766 in the amount of \$18,925.87.

H. On or about January 3, 2006, defendant ANTHONY DEHANEY caused Your Title Choice, Inc. to mail postclosing documents to Meritage Mortgage in Jacksonville, Florida 18624 via Fedex number 790765418614.

J. On or about January 12, 2006, defendant ANTHONY DEHANEY caused a warranty deed in the name of J.B. be filed in the land records of Broward County, Florida.

54. 6331 SW 7th Court, Margate, Florida

A. On or about January 13, 2004, defendant ANTHONY DEHANEY caused a contract for sale in the amount of \$238,000.00 to K.K. as purchaser to be signed, on the property located at 6331 SW 7th Court, Margate, Florida.

B. On or about December 28, 2004, defendants ANTHONY DEHANEY and MARCIA MESTRE caused false wage stubs to be prepared in the name of K.K. as the borrower.

C. On or about December 16, 2004, defendants ANTHONY DEHANEY and MARCIA MESTRE caused false W-2 forms to be prepared in the name of K.K. as the borrower.

D. On or about December 30, 2004, defendant ANTHONY DEHANEY caused a false Uniform Residential Loan Application (Form 1003) to be prepared in the name of K.K. as the borrower.

E. On or about December 30, 2004, defendant ANTHONY DEHANEY caused a real estate closing to take place at Your Title Choice, Inc in Fort Lauderdale, Florida.

F. On or about January 3, 2005, defendant ANTHONY DEHANEY caused Your Title Choice, Inc. to issue check number 43646, drawn on Union Bank Account ending in 7703, in the amount of \$150,666.15, and made payable to L.L.O. and R.P.O.

G. On or about January 3, 2005, defendant ANTHONY DEHANEY caused Your Title Choice, Inc. check 43646 to be negotiated at Union Bank.

H. On or about January 3, 2005, defendant ANTHONY DEHANEY caused a Union Bank Cashiers Check Number 4438364503 to be purchased in the amount of \$135, 524.20, payable to L.L.O. and R.P.O., reflecting Your Title Choice, Inc. as the remitter.

I. On or about January 3, 2005, defendant ANTHONY DEHANEY caused a Union Bank Cashiers Check Number 4438364504 to be purchased in the amount of \$15,141.870, payable to Your Title Choice, Inc., reflecting L.L.O. and R.P.O. as the remitter.

J. On or about January 3, 2005, defendant ANTHONY DEHANEY caused Union Bank Cashiers Check Number 4438364504, in the amount of \$15, 141.870, payable to Your Title Choice, Inc., to be brought to the closing as funds from the borrower K.K.

K. On or about December 30, 2004, defendant ANTHONY DEHANEY caused a warranty deed to be executed conveying said property located at 6331 SW 7th Court, Margate, Florida, to K.K.

L. On or about January 11, 2005, defendant ANTHONY DEHANEY caused a warranty deed in the name of K.K. be filed in the land records of Broward County, Florida.

M. On or about November 26, 2005, defendant ANTHONY DEHANEY caused a contract for sale in the amount of \$290,000.00 to M.H. as purchaser to be signed, on the property located at 6331 SW 7th Court, Margate, Florida.

N. On or about January 6, 2006, defendant ANTHONY DEHANEY caused a false Uniform Residential Loan Application (Form 1003) to be prepared in the name of M.H. as the borrower.

O. On or about January 11, 2006, defendant's ANTHONY DEHANEY and MARCIA MESTRE caused a false Verification of Employment Form to be prepared and signed in the name of M.H. the borrower.

P. On or about February 13, 2006, defendant ANTHONY DEHANEY caused Meritage Mortgage Funding, Columbia, South Carolina to wire transfer \$230,554.92 from its bank account at Net Bank, Alpharetta, Georgia, to the Your Title Choice, Inc. escrow account ending in ... 5478 at SunTrust Bank, Florida.

Q. On or about February 13, 2006, defendant ANTHONY DEHANEY caused a real estate closing to take place at Your Title Choice, Inc., in Fort Lauderdale, Florida.

R. On or about February 14, 2006, defendant ANTHONY DEHANEY caused Your Title Choice, Inc. to issue check 32235, in the amount of \$25,994.61 payable to K.K.

S. On or about February 14, 2006, defendant ANTHONY DEHANEY caused check 32235 to be negotiated in exchange for a SunTrust Official Check #0730388232, in the amount of \$25,776.10, payable to Your Title Choice, Inc., purchaser M.H.

T. On or about February 14, 2006, defendant ANTHONY DEHANEY caused SunTrust Official Bank check #0730388232 in the amount of \$25,776.10, to be brought to the closing in the name of M.H.

U. On or about February 13, 2006, defendant ANTHONY DEHANEY caused a warranty deed to be executed conveying said property located at 6331 SW 7th Court, Margate, Florida, to M.H.

V. On or about February 13, 2006, defendant ANTHONY DEHANEY caused a false Uniform Residential Loan Application (Form 1003) to be signed at the closing.
name of M.H.

W. On or about February 15, 2006, defendant ANTHONY DEHANEY caused Your Title Choice to mail the payoff documents on the K.K. loan via Fedex Package #790815086464, to the Payoff Department, Peoples Choice Home Loan, Inc., 7515 Irvine Center Drive, Irvine, California 92618.

X. On or about February 22, 2006, defendant ANTHONY DEHANEY caused a warranty deed in the name of M.H. to be filed in the land records of Broward County, Florida.

55. 5142 Heron Court, Coconut Creek, Florida

A. In or about early 2006, defendant ANTHONY DEHANEY caused a contract for sale in the amount of \$500,000.00 to be signed in the name of J.B. as purchaser, on the property located at 5142 Heron Court Coconut Creek, Florida.

B. On or about March 6, 2006, defendant ANTHONY DEHANEY caused a false Uniform Residential Loan Application (Form 1003) to be prepared in the name of J.B. as the borrower.

C. On or about March 29, 2006, defendants ANTHONY DEHANEY and MARCIA MESTRE caused a false telephone Verification of Employment form to be prepared in the name of J.B. as the borrower .

D. On or about March 30, 2006, defendant ANTHONY DEHANEY caused the Citibank NA in New York to wire transfer \$406,679.50 to the Your Title Choice, Inc., escrow account ending in 5478 at SunTrust Bank in Florida.

E. On or about March 30, 2006, defendant ANTHONY DEHANEY caused a real estate closing to take place at Your Title Choice, Inc., in Fort Lauderdale, Florida.

F. On or about March 30, 2006, defendant HOWARD GAINES issued Your Title Choice, Inc. check number 35495, payable to Pineapple Entertainment in the amount of \$55,039.00.

G. On or about March 30, 2006, Your Title Choice, Inc., check 35495 was negotiated at SunTrust Bank and used to purchase SunTrust Official Bank Check #0730390419.

H. On or about March 30, 2006, defendant ANTHONY DEHANEY caused SunTrust official bank check number 0730390419, in the amount of \$22,039.85, to be brought to the closing in the name of J.B.

I. On or about March 30, 2006, defendant ANTHONY DEHANEY caused a warranty deed to be executed conveying said property located at 5142 Heron Court, Coconut Creek, Florida, to J.B.

J. On or about March 30, 2006, defendant ANTHONY DEHANEY caused a false Uniform Residential Loan Application (Form 1003) to be signed in the name of J.B., as the borrower.

K. On or about March 30, 2006, defendant ANTHONY DEHANEY caused a warranty deed in the name of J.B. to be filed in the land records of Broward County, Florida.

L. On or about March 31, 2006, defendant ANTHONY DEHANEY caused Your Title Choice, Inc. to mail the closing documents by Fedex #791902969730 to FLC Financial, in Deerfield Beach, Florida.

56. 1201 SW 50th Avenue, #4-110, North Lauderdale, Florida

A. In or about 2006, defendant ANTHONY DEHANEY caused M.H., to purchase the property located at 1201 SW 50th Avenue, #4-110, North Lauderdale, Florida, in the amount of \$221,900.00.

B. On or about August 10, 2006, defendant ANTHONY DEHANEY caused a false earning statements and W-2 forms to be prepared in the name of M.H. as the borrower.

C. On or about August 31, 2006, defendant ANTHONY DEHANEY caused Wells Fargo Bank to wire transfer \$191,907.86 from WFHM Insti Lending Fusion Wire Account, Des Moines, Iowa, to Your Title Choice, Inc. escrow account ending in ... 5478 at SunTrust Bank in Florida.

D. On or about August 31, 2006, defendant ANTHONY DEHANEY caused a real estate closing to take place at Your Title Choice, Inc., in Fort Lauderdale, Florida.

E. On or about August 31, 2006, defendant ANTHONY DEHANEY caused a false Uniform Residential Loan Application (Form 1003) to be prepared in the name of M.H. as the borrower.

F. On or about August 31, 2006, defendant ANTHONY DEHANEY caused a warranty deed to be executed conveying said property to M.H. located at 1201 SW 50th Avenue, #4-110, North Lauderdale, Florida.

G. On or about September 19, 2006, defendant HOWARD GAINES issued Your Title Choice, Special Account Check number 1229, drawn on SunTrust Bank in the amount of \$1060.00, payable to Your Title Choice.

H. On or about September 19, 2006, defendants ANTHONY DEHANEY and HOWARD GAINES caused to be purchased a SunTrust Official bank check #0731340594, dated September 19, 2006, in the amount of \$2,560.23, reflecting M.H. as the remitter.

I. On or about September 19, 2006, defendant ANTHONY DEHANEY caused a SunTrust Official bank check #0731340594, dated September 19, 2006, in the amount of \$2,560.23, and reflecting M.H. as the remitter to be brought to the closing.

J. On or about September 19, 2006, defendant ANTHONY DEHANEY caused a SunTrust Official bank check #0731339928, in the amount of \$2,300.00, payable to Your Title Choice, and reflecting M.H. as the remitter to be brought to the closing.

K. On or about September 19, 2006, defendant ANTHONY DEHANEY caused a SunTrust Official bank check #0731339847, in the amount of \$31,000.00, payable to Your Title Choice, and reflecting M.H. as the remitter, to be brought to the closing.

L. On or about September 19, 2006, defendant ANTHONY DEHANEY caused Your Title Choice to mail the post closing documents via Fedex package number 799005510766 to Post Closing, Wells Fargo Bank, 2701 Wells Fargo Way, Minneapolis, Minnesota 55467.

M.. On or about September 26, 2006, defendant ANTHONY DEHANEY caused a warranty deed in the name of M.H. to be filed in the land records of Broward County, Florida.

All in violation of Title 18, United States Code, Sections 371 and 3237.

COUNTS 2 THROUGH 11 (MAIL FRAUD)

The allegations set forth in paragraphs 5 through 56 of Count I of this Indictment are incorporated herein by reference as though fully set forth herein.

57. On or about the dates enumerated as to each count below, at Broward County in the Southern District of Florida, and elsewhere, the defendants named in the counts set forth below devised and intended to devise a scheme and artifice to defraud, and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises, as set forth in paragraphs 2 through 56 of this Indictment, and for the purpose of executing and in furtherance of such scheme and artifice to defraud and for obtaining money by means of false and fraudulent pretenses, representations, and promises, and attempting to do so, the defendants, enumerated as to each count below did knowingly and willfully cause to be sent by private and commercial interstate carrier such matters and things, as more particularly described for each count below:

COUNT	DATE	DEFENDANTS	PROPERTY ADDRESS	DESCRIPTION OF MAILING
2	2/15/2005	ANTHONY DEHANEY	1224 NE 2 nd Avenue, Fort Lauderdale, Florida	Fedex package #790427056913 from Your Title Choice to Peoples Choice in California

COUNT	DATE	DEFENDANTS	PROPERTY ADDRESS	DESCRIPTION OF MAILING
3	2/15/2005	ANTHONY DEHANEY	6331 SW 7 th Court, Margate, Florida	Fedex package #790815086469 from Your Title Choice to Peoples Choice, California
4	4/29/2005	ANTHONY DEHANEY, BEVERLY IRELAND	2640 NW 80 th Avenue, Margate, Florida	Fedex package #792269881335 from Your Title Choice to Postclosing Department, Argent Mortgage, Company, One City Blvd. West, Orange, California.
5	8/17/2005	ANTHONY DEHANEY	712 NW 26 th Street, Wilton Manors, Florida	Fedex package #792503933797 from Your Title Choice to Long Beach Mortgage in Englewood, Colorado
6	11/10 /2005	ANTHONY DEHANEY	5200 NW 31st Avenue, B-36, Fort Lauderdale, Florida	Fedex package #792582233869 from Your Title Choice to Postclosing Department, Wachovia, 111 Corporate Center Drive, Raleigh, North Carolina.
7	1/3/2006	ANTHONY DEHANEY, HOWARD GAINES	1120 NE 10 th Avenue, Fort Lauderdale, Florida	Fedex package #79076518614 from Your Title Choice to Meritage, Jacksonville, Florida
8	3/31/2006	ANTHONY DEHANEY, HOWARD GAINES	5142 Heron Court, Coconut Creek, Florida	Fedex package #791902969730 from Your Title Choice to First NLC Financial, Deerfield Beach, Florida
9	4/13/2006	ANTHONY DEHANEY	5658 East Leitner, Coral Springs, Florida	Fedex package #791444725051 from Your Title Choice to BankFirst, Sioux Falls, South Dakota
10	9/19/2006	ANTHONY DEHANEY	1201 SW 50 th Avenue, #4-110, North Lauderdale, Florida	Fedex package #75906550766 from Your Title Choice to Wells Fargo, Minneapolis, Minnesota

COUNT	DATE	DEFENDANTS	PROPERTY ADDRESS	DESCRIPTION OF MAILING
11	12 /6/2006	ANGELA MANALAYSAY, ANTHONY DEHANEY	7450 NW 13th Court, Plantation, Florida	Fedex package #790622782924 from Your Title Choice to Century West Home Loan, 22981 Mill Creek Drive, Suite B, Laguna Hills, California in Englewood, Colorado

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

COUNTS 12 THROUGH 20 (WIRE FRAUD)

The allegations set forth in paragraphs 5 through 56 of Count 1 of this Indictment are incorporated herein by reference as though fully set forth herein.

58. On or about the dates set forth below at Broward County, in the Southern District of Florida, and elsewhere, the defendant ANTHONY DEHANEY did knowingly, willfully and with an intent to defraud devise a scheme and artifice to defraud and to obtain money from mortgage lenders by means of false and fraudulent pretenses, representations, and promises, knowing the representations and promises were false when made as more particularly described in paragraphs 2 through 56 of Count 1 of this Indictment.

59. For the purpose of executing and in furtherance of the scheme and artifice to defraud and for obtaining money by means of false and fraudulent pretenses, representations, and promises, the defendant ANTHONY DEHANEY did knowingly and willfully cause to be transmitted in interstate commerce by means of wire communications certain signals and sounds, as more particularly described for each count below:

COUNT	DATE	PROPERTY ADDRESS	DESCRIPTION OF WIRE FRAUD COMMUNICATION
12	2/14/2005	1224 NE 2 nd Avenue, Fort Lauderdale, Florida	Peoples Choice Mortgage wire transfer of \$426,916.15 from Bank One NA, in Chicago, Illinois to Your Title Choice escrow account ending in 6363 at Union Bank in Florida
13	8/16/2005	712 NW 26 th Street, Wilton Manors, Florida	Long Beach Mortgage wire transfer of \$365,257.56 from Washington Mutual Bank in Stockton, California to Your Title Choice escrow account ending in 5478 at SunTrust Bank in Florida
14	8/16/2005	712 NW 26 TH Street, Wilton Manors, Florida	Long Beach Mortgage wire transfer of \$89,283.68 from Washington Mutual Bank in Stockton, California to Your Title Choice escrow account ending in 5478 at SunTrust Bank in Florida
15	11/9/2005	5200 NW 31 st Avenue, B-36, Fort Lauderdale, Florida	Wachovia Mortgage Corporation Wire transfer of \$216,621.40 from Wachovia Bank, North Carolina to Your Title Choice Inc escrow account at SunTrust Bank ending in 5478 in Florida
16	2/13/2006	6331 SW 7 th Court, Margate, Florida	Meritage Mortgage wire transfer of \$230,554.92 from Net Bank in Alpharetta, Georgia to Your Title Choice escrow account ending in 5478 at SunTrust Bank in Florida
17	4/12/2006	5658 East Leitner Drive, Coral Springs, Florida	Bank First wire transfer of \$347,260.95 from Bank First, Sioux Falls, South Dakota to Your Title Choice escrow account ending in 5478 at SunTrust Bank in Florida

COUNT	DATE	PROPERTY ADDRESS	DESCRIPTION OF WIRE FRAUD COMMUNICATION
18	4/12/2006	5658 East Leitner Drive, Coral Springs, Florida	Bank First wire transfer of \$1,049,333.97 from Bank First, Sioux Falls, South Dakota to Your Title Choice escrow account ending in 5478 at SunTrust Bank in Florida
19	8/31/2006	1201 SW 50 th Avenue 4-110, North Lauderdale, Florida	WHFM wire transfer of \$191,907.86 from Wells Fargo NA San Francisco, California to Your Title Choice escrow account ending in 5478 at SunTrust Bank in Florida
20	11/30/2006	7450 NW 13 th Court, Plantation, Florida	New Century Mortgage Corporation Wire transfer of \$384,758.36 from Deutsche Bank Trust Co. New York, New York to Your Title Choice Inc escrow account at SunTrust Bank ending in 5478 in Florida

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

COUNTS 21 THROUGH 28 (BANKRUPTCY FRAUD)

60. On or about the dates enumerated as to each count below, in Broward County, in the Southern District of Florida, the defendant,

ANTHONY DEHANEY,

did knowingly and fraudulently make and cause to be made a false declaration, certificate, verification, and statement under penalty of perjury as permitted under Title 28, United States Code, Section 1746, in or in relation to a Chapter 13 Petition under Title 11 of the United States Code, in that the defendant caused to be filed at the Bankruptcy Clerk's Office, United States Federal

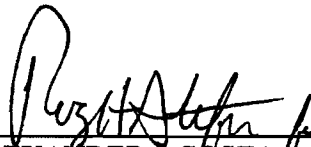
Courthouse, 299 East Broward Boulevard, Fort Lauderdale, Florida, a false and fraudulent Chapter

13 Petition with the forged signatures of the petitioner, to wit:


COUNT	DATE	NAME ON PETITION	COURT NUMBER
21	12/29/2004	D.G.	04-27754-RBR
22	4/6/2005	D.G.	05-21844-RBR
23	4/13/2005	L.H.	05-22052-PGH
24	2/19/2005	M.W.	05-60255-RBR
25	3/22/2006	M.W.	06-11000-RBR
26	9/5/2006	D.G.	06-14298-RBR
27	12/14/2006	M.W.	06-16609-JK0
28	10/29/2007	M.W.	07-19210-RBR

All in violation of Title 18, United States Code, Section 152(3) .

A TRUE BILL



R. ALEXANDER ACOSTA
UNITED STATES ATTORNEY



JEFFREY H. KAY
ASSISTANT UNITED STATES ATTORNEY