UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA,	)	**INDICTMENT** CR 11-348 RHK/LIB
	)	
Plaintiff,	)	(18 U.S.C. § 982(a)(6)(A))
	)	(18 U.S.C. § 1028A)
v.	)	(18 U.S.C. § 1542)
	)	(42 U.S.C. § 408(a)(7)(A))
FRANK CHESTER BROWN,	)	
a/k/a G.G.W. (a known person),	)	
Defendant.	)	
	)	

THE UNITED STATES GRAND JURY CHARGES THAT:

COUNT 1
(False Statements in a United States Passport Application)

On or about June 29, 2004, in the State and District of Minnesota, the defendant,

FRANK CHESTER BROWN,
a/k/a G.G.W. (a known person),

wilfully and knowingly made a false statement in an application for a United States passport with the intent to induce and secure the issuance of a passport under the authority of the United States, for his own use, contrary to the laws regulating the issuance of passports and the rules prescribed pursuant to such laws, specifically, the defendant provided the social security number and date and place of birth of victim G.G.W. (a known person) in an application for a United States passport and represented them as his own, all in violation of Title 18, United States Code, Section 1542.

SCANNED
NOV 08 2011
U.S. DISTRICT COURT ST. PAUL

FILED NOV 08 2011
RICHARD D. SLETTEN, CLERK
JUDGMENT ENTD
DEPUTY CLERK

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COUNT 2
(False Representation of a Social Security Number)

On or about March 30, 2007, in the State and District of Minnesota, the defendant,

FRANK CHESTER BROWN,
a/k/a G.G.W. (a known person),

willfully, knowingly, and with intent to deceive in a credit application for a Home Depot credit card, used social security account number ending 5006 assigned by the Commissioner of Social Security on the basis of false information he furnished to the Commissioner of Social Security, all in violation of Title 42, United States Code, Section 408(a)(7)(A).

COUNT 3
(False Representation of a Social Security Number)

On or about August 3, 2007, in the State and District of Minnesota, the defendant,

FRANK CHESTER BROWN,
a/k/a G.G.W. (a known person),

willfully, knowingly, and with intent to deceive in a credit application for a motorcycle financing loan from Eaglemark Savings Bank, used social security account number ending 5006 assigned by the Commissioner of Social Security on the basis of false information he furnished to the Commissioner of Social Security, all in violation of Title 42, United States Code, Section 408(a)(7)(A).

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COUNT 4
(False Representation of a Social Security Number)

On or about January 3, 2009, in the State and District of Minnesota, the defendant,

FRANK CHESTER BROWN,
a/k/a G.G.W. (a known person),

willfully, knowingly, and with intent to deceive in a checking account application for an account with First National Bank of Henning, used a social security account number ending 5006 assigned by the Commissioner of Social Security on the basis of false information he furnished to the Commissioner of Social Security, all in violation of Title 42, United States Code, Section 408(a)(7)(A).

COUNT 5
(False Representation of a Social Security Number)

On or about March 10, 2009, in the State and District of Minnesota, the defendant,

FRANK CHESTER BROWN,
a/k/a G.G.W. (a known person),

willfully, knowingly, and with intent to deceive in a credit application for a Home Depot credit card, used a social security account number ending 5006 assigned by the Commissioner of Social Security on the basis of false information he furnished to the Commissioner of Social Security, all in violation of Title 42, United States Code, Section 408(a)(7)(A).

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COUNT 6
(False Representation of a Social Security Number)

On or about November 3, 2010, in the State and District of Minnesota, the defendant,

FRANK CHESTER BROWN,
a/k/a G.G.W. (a known person),

willfully, knowingly, and with intent to deceive in a checking account application for an account with First National Bank of Henning, used a social security account number ending 5006 assigned by the Commissioner of Social Security on the basis of false information he furnished to the Commissioner of Social Security, all in violation of Title 42, United States Code, Section 408(a)(7)(A).

COUNT 7-11
(Aggravated Identity Theft)

On or about the dates set forth below, in the State and District of Minnesota, the defendant,

FRANK CHESTER BROWN,
a/k/a G.G.W. (a known person),

did knowingly possess and use, without lawful authority, a means of identification of another person, to wit: the name and date of birth of G.G.W. (a real person), as alleged in each count below, during and in relation to the commission of a felony enumerated in Title 18, United States Code, Section 1028A, subsection (c), to wit, Social Security Fraud:

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Count	Date(s)	Description
7	March 30, 2007	Unlawful use of the name and date of birth of G.G.W., a real person, during the commission of Social Security Fraud as alleged in Count 2
8	August 3, 2007	Unlawful use of the name and date of birth of G.G.W., a real person, during the commission of Social Security Fraud as alleged in Count 3
9	January 3, 2009	Unlawful use of the name of G.G.W. and date of birth, a real person, during the commission of Social Security Fraud as alleged in Count 4
10	March 10, 2009	Unlawful use of the name and date of birth of G.G.W., a real person, during the commission of Social Security Fraud as alleged in Count 5
11	November 3, 2010	Unlawful use of the name of G.G.W., a real person, during the commission of Social Security Fraud as alleged in Count 6

All in violation of Title 18, United States Code, Section 1028A.

FORFEITURE ALLEGATIONS

Count 1 of this Indictment is re-alleged for the purpose of alleging forfeitures pursuant to 18 U.S.C. § 982(a)(6)(A). If the Defendant is convicted of Count 1 of the indictment, the Defendant shall forfeit:

(a) any and all conveyances used in the commission of the offense;

(b) any and all real and personal property that constitutes, is derived from, or is traceable to proceeds obtained directly or indirectly from the commission of the offense; and

(c) any and all real and personal property used to facilitate, or which was intended to be used to facilitate, the commission of the offense.

If any of the above-referenced property is unavailable for forfeiture as described in 21 U.S.C. § 853(p), the United States intends to seek the forfeiture of substitute assets pursuant to 21 U.S.C. § 853(p) as incorporated by 18 U.S.C. § 982(b)(1).

A TRUE BILL

UNITED STATES ATTORNEY

FOREPERSON