UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA	:	Criminal No. 18-
	:	
v.	:	18 U.S.C. § 1343
	:	18 U.S.C. § 1028A
ANNIE M. FORD,	:	
a/k/a "Annie M. Hollingsworth"	:	
	:	

INDICTMENT

The Grand Jury in and for the District of New Jersey, sitting at Newark, charges:

COUNT ONE
(Wire Fraud)

BACKGROUND

1. At all times relevant to this Indictment:

a. Defendant Annie M. Ford, a/k/a Annie M. Hollingsworth, ("FORD") was a resident of Atlanta, Georgia. Defendant FORD's married name was Annie M. Hollingsworth.

b. Community Development Consulting Group ("CDCG") was a non-profit corporation registered with the North Carolina Department of the Secretary of State. FORD was the sole incorporator and registered agent for CDCG.

c. "Bank A" was a national bank that maintained a checking account for CDCG (the "CDCG Bank Account"). FORD was the sole owner and signer on the CDCG Bank Account.

d. "Intermediary 1" was a resident of Las Vegas, Nevada.

e. "Intermediary 2" was a resident of Hillside, New Jersey and purported to operate a capital funding business in Union, New Jersey.

f. "Corporate Intermediary 1" purported to be a marketing and sales corporation that facilitated lending arrangements and maintained an office in Jersey City, New Jersey.

g. "Company A" was a corporation with its principal place of business located in or around New York, New York that provided alternative financing to businesses and individuals.

h. "Victim 1" was a resident of New Jersey and a professional basketball player for a team in the National Basketball Association ("NBA").

THE SCHEME TO DEFRAUD

2. From in or around October 2013 through in or around late November 2013, in the District of New Jersey, and elsewhere, the defendant,

ANNIE M. FORD,
a/k/a "Annie M. Hollingsworth,"

did knowingly and intentionally devise a scheme and artifice to defraud, and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, and, for the purpose of executing and attempting to execute such scheme and artifice, did transmit and cause to be transmitted by means of wire, radio, and television communication in interstate and foreign commerce writings, signs, signals, and sounds, as more fully set forth below.

GOAL OF THE SCHEME

3. The object of the scheme and artifice to defraud was for defendant FORD to enrich herself by attempting to obtain an approximately $2,500,000 loan in the name of Victim 1, without Victim 1's knowledge or consent, which was to be deposited in the CDCG Bank Account that was controlled by FORD.

MANNER AND MEANS OF THE SCHEME

4. It was part of the scheme and artifice to defraud that:

a. Defendant FORD created fraudulent documents that FORD caused to be submitted to Company A in support of a loan application in the name of Victim 1 (the "Loan Application").

b. Defendant FORD forged, or caused to be forged, Victim 1's signature on documents that FORD caused to be submitted to Company A in support of the Loan Application.

c. Defendant FORD transmitted the fraudulent and forged documents by email and facsimile to Intermediary 1, and the documents were then transmitted by email through multiple intermediaries, including Intermediary 2 and Corporate Intermediary 1, before being submitted to Company A in support of the Loan Application.

d. On or about November 22, 2013, defendant FORD forged, or caused to be forged, Victim 1's signature on a Merchant Agreement between CDCG, doing business as Victim 1, and Company A, notarized the Merchant Agreement as Annie Mildred Hollingsworth, and caused the fraudulent

Merchant Agreement to be submitted to Company A in support of the Loan Application.

e. On or about November 22, 2013, defendant FORD forged, or caused to be forged, Victim 1's signature on an escrow document providing that an approximately $2,500,000 loan from Company A would be deposited into the CDCG Bank Account, notarized the escrow document as Annie Mildred Hollingsworth, and caused the fraudulent escrow document to be submitted to Company A in support of the Loan Application.

f. On or about November 22, 2013, defendant FORD participated in a conference call to discuss the Loan Application with Company A, and others, including Intermediary 1, Intermediary 2, who dialed-in from New Jersey, and a representative of Corporate Intermediary 1. During the call, one of the participants impersonated Victim 1 in an effort to facilitate the Loan Application.

g. On or about November 25, 2013, defendant FORD forged, or caused to be forged, Victim 1's signature on a power of attorney document that appointed Intermediary 1 as Victim 1's "attorney-in-fact" for "Banking and Financial Matters," and notarized the power of attorney document as Annie Mildred Hollingsworth.

All in violation of Title 18, United States Code, Section 1343.

COUNTS TWO THROUGH FOUR
(Aggravated Identity Theft)

1. The allegations contained in Paragraphs 1 and 4 of Count One of this Indictment are hereby repeated, realleged, and incorporated as if fully set forth herein.

2. On or about the dates set forth below, in the District of New Jersey and elsewhere, defendant

ANNIE M. FORD,
a/k/a "Annie M. Hollingsworth,"

during and in relation to a felony violation of 18 U.S.C. § 1343, as set forth in Count One of the Indictment, did knowingly transfer, possess, and use, without lawful authority, a means of identification of another person, as set forth in the individual counts below:

COUNT	APPROXIMATE DATE	MEANS OF IDENTIFICATION
2	November 22, 2013	Name and forged signature of Victim 1 on a Merchant Agreement between CDCG, doing business as Victim 1, and Company A
3	November 22, 2013	Name and forged signature of Victim 1 on an escrow document providing that an approximately $2,500,000 loan from Company A would be deposited into the CDCG Bank Account
4	November 25, 2013	Name and forged signature of Victim 1 on a power of attorney document that appointed Intermediary 1 as Victim 1's "attorney-in-fact" for "Banking and Financial Matters"

All in violation of Title 18, United States Code, Section 1028A(a)(1).

FORFEITURE ALLEGATION

1. The allegations contained in all paragraphs of Count One of this Indictment are hereby realleged and incorporated by reference for the purpose of noticing forfeitures pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

2. As a result of committing the offense charged in Count One of this Indictment, defendant

ANNIE M. FORD,
a/k/a "Annie M. Hollingsworth,"

shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461, all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of the said offense, and all property traceable thereto.

Substitute Assets Provision

3. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

a. cannot be located upon the exercise of due diligence;

b. has been transferred or sold to, or deposited with a third party;

c. has been placed beyond the jurisdiction of the court;

d. has been substantially diminished in value; or

e. has been commingled with other property which cannot be divided without difficulty;

the United States shall be entitled, pursuant to 21 U.S.C. § 853(p) (as incorporated by 28 U.S.C. § 2461(c)), to forfeiture of any other property of the defendant up to the value of the above-described forfeitable property.

A TRUE BILL

[redacted]

FOREPERSON

Craig Carpenito

CRAIG CARPENITO
United States Attorney

CASE NUMBER: 18 - ______

United States District Court
District of New Jersey

UNITED STATES OF AMERICA

v.

ANNIE M. FORD
a/k/a "Annie M. Hollingsworth"

INDICTMENT FOR
18 U.S.C. § 1343
18 U.S.C. § 1028A

A True Bill,

[redacted]

Foreperson

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NEWARK, NEW JERSEY

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