

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

- - - - - X  
UNITED STATES OF AMERICA : SEALED INDICTMENT  
: 18 Cr.  
- v. - :  
SECONEY BROWN, :  
ANTOINETTE MITCHELL-BROWN, :  
a/k/a "Antoinette Mitchell-Morgan," :  
and ANTHONY ATKINSON, :  
Defendants. :  
- - - - - X

**18 CRIM 278**

COUNT ONE  
(Conspiracy to Commit Bank Fraud)

The Grand Jury charges:

OVERVIEW OF THE SCHEME

1. From at least September 2016 until at least December 2016, SECONEY BROWN, ANTOINETTE MITCHELL-BROWN, a/k/a "Antoinette Mitchell-Morgan," and ANTHONY ATKINSON, the defendants, and their co-conspirators, engaged in a scheme to fraudulently obtain funds from more than twenty-five accounts at a bank at which MITCHELL-BROWN was then employed ("Bank-1"). In furtherance of the scheme, MITCHELL-BROWN stole victims' bank account information from her employer and used that information to, among other things, write checks for thousands of dollars from victims' accounts and initiate wire transfers from victims' accounts to bank accounts controlled by members of the scheme. BROWN and ATKINSON, among other things, paid members of the

scheme or otherwise induced other individuals (some of whom provided unwitting assistance) to cash or deposit the fraudulent checks from MITCHELL-BROWN, and provide the proceeds to BROWN, ATKINSON, or, at BROWN and ATKINSON's direction, other individuals. In total, the defendants' scheme fraudulently obtained more than \$77,000 and attempted to obtain at least an additional \$660,000.

RELEVANT PERSONS

2. At all times relevant to this Indictment, SECONNEY BROWN, the defendant, was the organizer and leader of the scheme. Among other things, BROWN visited Bank-1's offices; obtained over-the-counter checks written from victims' accounts from ANTOINETTE MITCHELL-BROWN, a/k/a "Antoinette Mitchell-Morgan," the defendant; paid or otherwise induced other individuals to cash or deposit the unlawfully obtained checks; and, when successful, collected the funds received from those checks.

3. At all times relevant to this Indictment, ANTOINETTE MITCHELL-BROWN, a/k/a "Antoinette Mitchell-Morgan," the defendant, was employed as a bank associate by Bank-1. Among other things, MITCHELL-BROWN stole blank over-the-counter checks from Bank-1; improperly used personally identifiable information to which she had access as an employee of Bank-1 to complete those checks with victims' bank account information; provided

those fraudulent checks to SEONEY BROWN, the defendant; and initiated unauthorized wire transfers from victims' accounts to bank accounts controlled by members of the scheme.

4. At all times relevant to this Indictment, ANTHONY ATKINSON, the defendant, was a member of the scheme who, among other things, assisted co-conspirators with cashing or depositing fraudulent over-the-counter checks into his own bank account and the bank accounts of other individuals.

STATUTORY ALLEGATIONS

5. From at least in or about September 2016 up to and including at least in or about December 2016, in the Southern District of New York and elsewhere, SEONEY BROWN, ANTOINETTE MITCHELL-BROWN, a/k/a "Antoinette Mitchell-Morgan," and ANTHONY ATKINSON, the defendants, and others known and unknown, willfully and knowingly, did combine, conspire, confederate, and agree together and with each other to commit bank fraud, in violation of Title 18, United States Code, Section 1344.

6. It was a part and object of the conspiracy that SEONEY BROWN, ANTOINETTE MITCHELL-BROWN, a/k/a "Antoinette Mitchell-Morgan," and ANTHONY ATKINSON, the defendants, and others known and unknown, willfully and knowingly, would and did execute and attempt to execute a scheme and artifice to defraud a financial institution, the deposits of which were then insured by the Federal Deposit Insurance Corporation ("FDIC"), and to

obtain moneys, funds, credits, assets, securities, and other property owned by, and under the custody and control of, such financial institution, by means of false and fraudulent pretenses, representations, and promises, in violation of Title 18, United States Code, Section 1344.

(Title 18, United States Code, Section 1349.)

COUNT TWO  
(Aggravated Identity Theft)

The Grand Jury further charges:

7. The allegations contained in paragraphs 1 through 4 above are hereby repeated, realleged, and incorporated by reference as if fully set forth herein.

8. From at least in or about September 2016 up to and including at least in or about December 2016, in the Southern District of New York and elsewhere, SEONEY BROWN, ANTOINETTE MITCHELL-BROWN, a/k/a "Antoinette Mitchell-Morgan," and ANTHONY ATKINSON, the defendants, knowingly did transfer, possess, and use, without lawful authority, a means of identification of another person, during and in relation to a felony violation enumerated in Title 18, United States Code, Section 1028A(c), to wit, MITCHELL-BROWN transferred from the bank with which she was employed to BROWN, ATKINSON, and other co-conspirators not named herein, without lawful authority, checks and other means of conveying funds bearing the names, bank account numbers, and

other personally identifiable information of individuals other than MITCHELL-BROWN, BROWN, ATKINSON, and their co-conspirators, which BROWN and ATKINSON, in turn, transferred, possessed, and used, during and in relation to the conspiracy to commit bank fraud charged in Count One of this Indictment.

(Title 18, United States Code, Sections 1028A(a)(1), 1028A(b) and 2.)

FORFEITURE ALLEGATION

9. As a result of committing the offense alleged in Count One of this Indictment, SEONEY BROWN, ANTOINETTE MITCHELL-BROWN, a/k/a "Antoinette Mitchell-Morgan," and ANTHONY ATKINSON, the defendants, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(2)(A), any and all property constituting or derived from, proceeds obtained directly or indirectly, as a result of the commission of said offense, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense that the defendants personally obtained.

Substitute Assets Provision

10. 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 person;

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 subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Section 982; Title 21, United States Code, Section 853; and Title 28, United States Code, Section 2461.)

[REDACTED]  
Foreperson

4-10-18

Geoffrey S. Berman  
GEOFFREY S. BERMAN  
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

---

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

---

UNITED STATES OF AMERICA

v.

SECONY BROWN,  
ANTOINETTE MITCHELL-BROWN,  
a/k/a "Antoinette Mitchell-Morgan,"  
and ANTHONY ATKINSON,

Defendants.

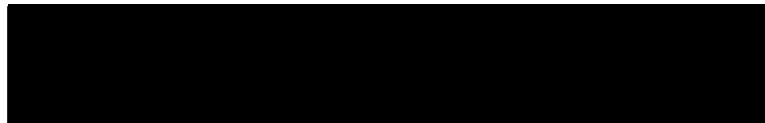
---

SEALED INDICTMENT

18 Cr. \_\_\_\_\_

(18 U.S.C. §§ 1028A(a)(1), 1028A(b),  
1349, and 2.)

GEOFFREY S. BERMAN  
United States Attorney

A large rectangular area of the document has been completely blacked out with a redaction marker, obscuring a signature.