

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA, : SEALED INDICTMENT  
-v.- : 11 Cr. \_\_\_\_\_ (\_\_\_\_\_)

EDWIN JACQUET, :  
a/k/a "Carlton Exile," :  
a/k/a "Donald Banks," :  
a/k/a "Roger," :  
PETER ROMEO, :  
EDWIN J. MANSOUR, JR., :  
a/k/a "Edwin Perello," :  
DENISE HUDSON, :  
a/k/a "Denise Barnes," :  
a/k/a "Patrice Brown," :  
Defendants. :

**11 CRIM 612**

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COUNT ONE  
(Conspiracy to Commit Bank Fraud)

The Grand Jury charges:

BACKGROUND

1. Consumer reporting agencies ("CRAs") are businesses that engage in the practice of assembling and evaluating consumer credit information and other information regarding consumers for the purpose of providing reports about the credit-worthiness of consumers to third parties ("credit reports"). CRAs are frequently referred to as "credit bureaus." Among the largest CRAs in the United States are Experian Information Solutions, Inc. ("Experian") and TransUnion LLC ("TransUnion").

2. CRAs typically sell credit reports, directly and indirectly, to, among others, entities in the business of making decisions regarding whether, and on what terms, to lend money to consumers or to sell goods and services to consumers on credit (the "end-users"). CRAs may also provide end-users with "credit scores." Credit scoring is a statistical methodology that quantifies the credit risk posed by a prospective or current borrower and is based on the information contained in a credit report. The technique of credit scoring is widely used to evaluate applications for credit, identify prospective borrowers, and manage existing credit accounts. The ultimate credit score of a particular consumer is influenced by many factors, including the consumer's payment history, utilization of credit, balances, available credit limit, and length of credit history. End-users of credit reports and credit scores use them to determine the creditworthiness of their customers. Common end-users of credit reports and/or credit scores are credit card issuers, mortgage lenders, and automobile lenders. Collectively, Experian and TransUnion maintain information comprising the credit histories of hundreds of millions of individuals, including many individuals residing in the Southern District of New York.

3. Credit histories are comprised of information provided to CRAs by, among other sources, "furnishers."

Furnishers are entities that provide information relating to consumers to one or more CRAs for inclusion by the CRA in a credit report and, ultimately, for the information to be factored into a credit score. Common furnishers are credit card issuers, automobile lenders, department stores, utilities, insurers, and collection agencies. Many furnishers are also end-users of credit reports. Because of the importance of credit histories and credit scores to lending decisions, the integrity and availability of accurate data and information maintained by CRAs is extremely important to furnishers, end-users, and CRAs.

4. A furnisher of information to one or more CRAs typically enters into an agreement with one or more CRAs to periodically provide data regarding the furnisher's experience with customers of the furnisher. Pursuant to this type of agreement, a furnisher provides information electronically to one or more CRAs. In doing so, a furnisher can indicate, among other things, the amount of credit originally extended to the furnisher's customer, the current balance on the customer's account, and whether the furnisher's customer has regularly paid the balance on his or her account.

5. A line of credit is an agreement between a lender and a consumer whereby the lender agrees to lend a consumer funds up to an agreed upon limit. The consumer may borrow as much of the line as needed and pays interest on the borrowed portion

only. Payment amounts are typically based upon the outstanding balance amount. A line of credit that a furnisher's customer has held open and in good standing for a long period of time, typically at least two years, is known as a "seasoned trade line."

6. A furnisher may also provide historical data to a CRA. That is, a furnisher can provide information on a particular credit account that the furnisher had extended prior to the provision of the information to the CRA, including whether the furnisher's customer had been making payments on the credit account prior to the provision of the information to the CRA.

7. For the purposes of maintaining information regarding consumers, generating credit histories, and calculating credit scores, CRAs maintain centralized computer databases into which information provided by furnishers is entered. For example, TransUnion maintains some databases in or around Chicago, Illinois. The accuracy of the information maintained by CRAs is crucial to the maintenance by CRAs of accurate credit histories of consumers and to informed lending decisions by end-users of credit histories.

8. Pursuant to the Fair Credit Reporting Act, 15 U.S.C. § 1681 et seq. (the "FCRA"), both CRAs and furnishers have duties to correct information maintained by, and provided to, CRAs, if they learn that such information is incomplete or

inaccurate. For example, if a consumer informs a furnisher that information maintained by the furnisher and provided to a CRA about a particular debt is inaccurate, the furnisher must conduct an investigation with respect to the disputed information and report the results of the investigation to any CRA to which the furnisher had previously reported the disputed information. Similarly, if the completeness or accuracy of any information contained in a consumer's file at a CRA is disputed by the consumer and the consumer notifies the CRA, directly or indirectly, of such dispute, the CRA is required to conduct a reasonable reinvestigation to determine whether the disputed information is inaccurate and to record the current status of the disputed information. In order to do so, the CRA may need to inquire of the furnisher about the information previously provided by the furnisher.

9. In order to be able to respond to disputes from consumers, Experian and TransUnion, among other CRAs, developed a Internet-based computer software tool that permits CRAs, among other things, to inquire of furnishers about disputes and for furnishers to report to CRAs corrections to consumer accounts. This software tool is known as "E-Oscar," which stands for Online Solution for Complete and Accurate Reporting.

10. A furnisher with access to E-Oscar can modify, or even delete, existing account information maintained by CRAs

through submission of an Automated Universal Data Form ("AUD") in the E-Oscar system. Until in or about late 2009, a furnisher with access to E-Oscar could modify or delete existing account information maintained by CRAs with respect to consumer debts owed to other furnishers. Modification of information about a consumer debt via E-Oscar results in changes to a consumer's credit history, as reflected in the databases maintained by CRAs.

**HIGHWAY FURNITURE AND NEW YORK  
FUNDING BECOME FURNISHERS TO CRAS**

11. In or about September and October 2007, Highway Furniture, Inc. ("Highway Furniture") entered into a series of agreements to, among other things, furnish data to TransUnion regarding Highway Furniture's customers and to obtain credit reports from TransUnion. Around the same time, Highway Furniture entered into a similar series of agreements with Experian. In doing so, Highway Furniture represented, in substance and in part, that it was in the business of making and selling mattresses and that it operated out of a factory location on Alabama Avenue in Brooklyn. In or about February 2008, Highway Furniture's information was updated to indicate that its business address was now on Fulton Avenue in Hempstead, Long Island.

12. In or about July 2008, New York Funding Group Inc. ("New York Funding") entered into a series of agreements to, among other things, furnish data to TransUnion regarding New York Funding's customers and to obtain credit reports from TransUnion.

Around the same time, New York Funding entered into a similar series of agreements with Experian. In doing so, New York Funding represented, in substance and in part, that it was in the business of purchasing consumer debt and granting credit and that it operated out of the same location on Fulton Avenue in Hempstead, Long Island, that Highway Furniture had reported as its address to TransUnion and Experian in or about February 2008.

**THE FRAUDULENT CREDIT REPAIR CONSPIRACY**

13. From at least in or about 2007 through at least in or about 2010, EDWIN JACQUET, a/k/a "Carlton Exile," a/k/a "Donald Banks," PETER ROMEO, EDWIN J. MANSOUR, JR., a/k/a "Edwin Perello," and DENISE HUDSON, a/k/a "Denise Barnes," a/k/a "Patrice Brown," the defendants, together with others known and unknown, engaged in a scheme to falsely and fraudulently improve the credit history and credit score of thousands of individuals who were purportedly customers of Highway Furniture and New York Funding (the "Purported Customers") and, as a result, to permit the Purported Customers to obtain loans from, various lenders, including financial institutions, the deposits of some of which were insured by the Federal Deposit Insurance Corporation. The co-conspirators typically charged each Purported Customer several hundred dollars to falsely and fraudulently improve the Purported Customer's credit history and credit score.

14. In furtherance of the scheme to defraud, from in or about 2007 through in or about 2008, EDWIN JACQUET, a/k/a "Carlton Exile," a/k/a "Donald Banks," PETER ROMEO, EDWIN J. MANSOUR, JR., a/k/a "Edwin Perello," and DENISE HUDSON, a/k/a "Denise Barnes," a/k/a "Patrice Brown," the defendants, together with others known and unknown, furnished to Experian information falsely and fraudulently indicating that Highway Furniture had extended over approximately 2,400 seasoned trade lines to thousands of Purported Customers between February 2002 and March 2008. Of these over approximately 2,400 lines of credit, over approximately 700 lines of credit were purportedly extended to Purported Customers who resided in California, over approximately 150 lines of credit to Purported Customers who resided in Florida, and over approximately 150 lines of credit to Purported Customers who resided in Illinois, even though Highway Furniture operated out of a factory location in Brooklyn, New York, and had no mechanism by which it could consummate sales of mattresses to individuals located far from Brooklyn. In addition, over approximately 800 lines of credit were purportedly extended to Purported Customers who resided in New York, including to Purported Customers who resided in the Southern District of New York. During the same period, JACQUET, ROMEO, MANSOUR, and HUDSON, together with others known and unknown, furnished to



Experian false and fraudulent information regarding the payment history for these lines of credit.

15. In furtherance of the scheme to defraud, from in or about September 2008 through in or about December 2008, EDWIN JACQUET, a/k/a "Carlton Exile," a/k/a "Donald Banks," PETER ROMEO, EDWIN J. MANSOUR, JR., a/k/a "Edwin Perello," and DENISE HUDSON, a/k/a "Denise Barnes," a/k/a "Patrice Brown," the defendants, together with others known and unknown, submitted, and caused to be submitted, thousands of fraudulent AUDs through the E-Oscar system, including many AUDs requesting that accounts relating to consumer debts owed to furnishers other than Highway furniture be deleted, and thereby, falsely and fraudulently impacted the credit of hundreds of consumers.

16. In furtherance of the scheme to defraud, from in or about 2008 through in or about 2009, EDWIN JACQUET, a/k/a "Carlton Exile," a/k/a "Donald Banks," PETER ROMEO, EDWIN J. MANSOUR, JR., a/k/a "Edwin Perello," and DENISE HUDSON, a/k/a "Denise Barnes," a/k/a "Patrice Brown," the defendants, together with others known and unknown, furnished to Experian information falsely and fraudulently indicating that New York Funding had extended over approximately 350 seasoned trade lines to thousands of Purported Customers between September 1993 and October 2007. Of these over approximately 350 lines of credit, over approximately 120 lines of credit were purportedly extended to

Purported Customers who resided in California. In addition, over approximately 120 lines of credit were purportedly extended to Purported Customers who resided in New York, including to Purported Customers who resided in the Southern District of New York. During the same period, and as the co-conspirators did with the Purported Customers of Highway Furniture, JACQUET, ROMEO, MANSOUR, and HUDSON, together with others known and unknown, furnished to Experian false and fraudulent information regarding the payment history of these lines of credit.

17. Based on the furnishing of false and fraudulent information to Experian and TransUnion and the deletion of accurate credit information maintained in the databases of Experian and TransUnion by EDWIN JACQUET, a/k/a "Carlton Exile," a/k/a "Donald Banks," PETER ROMEO, EDWIN J. MANSOUR, JR., a/k/a "Edwin Perello," and DENISE HUDSON, a/k/a "Denise Barnes," a/k/a "Patrice Brown," the defendants, together with others known and unknown, the credit histories and credit scores of thousands of Purported Customers of Highway Furniture and New York Funding were falsely and fraudulently improved and the integrity and availability of data, programs, systems, and information maintained by Experian and TransUnion was impaired and loss aggregating at least \$5,000 in value to one and more persons during a one-year period was caused.

18. After having their credit histories and credit scores falsely and fraudulently improved, the Purported Customers of Highway Furniture and New York Funding then obtained thousands of loans, including mortgages, credit cards, and student loans, totaling in the millions of dollars.

RELEVANT PERSONS

19. At all times relevant to this Indictment, EDWIN JACQUET, a/k/a "Carlton Exile," a/k/a "Donald Banks," a/k/a "Roger," the defendant, was a resident of Brooklyn, New York. Among other roles in the fraudulent scheme, JACQUET submitted applications to TransUnion and Experian for Highway Furniture and New York Funding to become furnishers to those CRAs.

20. At all times relevant to this Indictment, PETER ROMEO, the defendant, was a resident of Brooklyn, New York. Among other roles in the fraudulent scheme, ROMEO submitted an application to Experian for a company that was a successor to Highway Furniture and New York Funding in the scheme, Exquisite Jewelers Corp., to become a furnisher to Experian. ROMEO and EDWIN JACQUET, a/k/a "Carlton Exile," a/k/a "Donald Banks," a/k/a "Roger," the defendant, are cousins.

21. At all times relevant to this Indictment, EDWIN J. MANSOUR, JR., a/k/a "Edwin Perello," the defendant, was a resident of Staten Island, New York. Among other roles in the fraudulent scheme, MANSOUR created various legal entities and

opened bank accounts through which the co-conspirators executed the fraudulent scheme.

22. At all times relevant to this Indictment, DENISE HUDSON, a/k/a "Denise Barnes," a/k/a "Patrice Brown," the defendant, was a resident of Brooklyn, New York. Among other roles in the fraudulent scheme, HUDSON entered false and fraudulent data into the databases maintained by TransUnion and Experian via computer. HUDSON also communicated with brokers (the "Brokers") who operated businesses that purported to be able to "repair" credit and recruited Purported Customers. At least two such Brokers operated their credit repair businesses from the Southern District of New York. The Brokers were typically charged a fee on a per-customer basis for Highway Furniture and New York Funding to falsely and fraudulently improve the credit of the Purported Customers. In turn, the Brokers passed the fee along to the Purported Customers.

#### MEANS AND METHODS OF THE CONSPIRACY

23. Among the means and methods by which EDWIN JACQUET, a/k/a "Carlton Exile," a/k/a "Donald Banks," a/k/a "Roger," PETER ROMEO, EDWIN J. MANSOUR, JR., a/k/a "Edwin Perello," and DENISE HUDSON, a/k/a "Denise Barnes," a/k/a "Patrice Brown," the defendants, together with others known and unknown, and their co-conspirators would and did carry out the conspiracy were the following:

a. The co-conspirators entered into agreements on behalf of Highway Furniture and New York Funding with one or more CRAs to become furnishers of data to CRAs.

b. The co-conspirators deceived, and attempted to deceive, inspectors acting on behalf of the CRAs into believing that Highway Furniture, New York Funding, and Exquisite Jewelers engaged in the businesses that the co-conspirators claimed that they engaged in at the time that the inspectors, acting on behalf of the CRAs, physically visited the premises out of which Highway Furniture, New York Funding, and Exquisite Jewelers purported to conduct business.

c. The co-conspirators recruited Purported Customers through, among other means, the Brokers.

d. In order to improve the credit histories and credit scores of the Purported Customers, the co-conspirators furnished data to CRAs that falsely and fraudulently indicated to the CRAs that Highway Furniture and New York Funding had extended thousands of seasoned trade lines to thousands of customers, when, in truth and in fact, and as the conspirators then and there well knew, Highway Furniture and New York Funding had extended no such credit.

e. In order to improve the credit histories and credit scores of the Purported Customers, the co-conspirators furnished data to CRAs that falsely and fraudulently indicated to

the CRAs that thousands of customers of Highway Furniture and New York Funding had regularly made payments on their thousands of seasoned trade lines, when, in truth and in fact, and as the co-conspirators then and there well knew, Highway Furniture and New York Funding's customers had no such payment history.

f. In order to improve the credit histories and credit scores of the Purported Customers, the co-conspirators, via the E-Oscar system, falsely and fraudulently deleted legitimate consumer debts owed to furnishers other than Highway Furniture and New York Funding.

g. Based upon their falsely and fraudulently improved credit histories and credit scores, the co-conspirators who were Purported Customers then obtained loans.

#### STATUTORY ALLEGATIONS

24. From at least in or about 2007 through in or about 2010, in the Southern District of New York and elsewhere, EDWIN JACQUET, a/k/a "Carlton Exile," a/k/a "Donald Banks," a/k/a "Roger," PETER ROMEO, EDWIN J. MANSOUR, JR., a/k/a "Edwin Perello," and DENISE HUDSON, a/k/a "Denise Barnes," a/k/a "Patrice Brown," the defendants, together with others known and unknown, willfully and knowingly did combine, conspire, confederate, and agree, together and with others, to commit an offense against the United States, to wit, bank fraud, in violation of Title 18, United States Code, Section 1344.

25. It was a part and an object of the conspiracy that EDWIN JACQUET, a/k/a "Carlton Exile," a/k/a "Donald Banks," a/k/a "Roger," PETER ROMEO, EDWIN J. MANSOUR, JR., a/k/a "Edwin Perello," and DENISE HUDSON, a/k/a "Denise Barnes," a/k/a "Patrice Brown," the defendants, together with 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 insured by the Federal Deposit Insurance Corporation, 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.

#### OVERT ACTS

26. In furtherance of the conspiracy and to effect the illegal object thereof, the following overt acts, among others, were committed and caused to be committed in the Southern District of New York and elsewhere:

a. On or about September 12, 2007, EDWIN JACQUET, a/k/a "Carlton Exile," a/k/a "Donald Banks," a/k/a "Roger," the defendant, spoke by telephone with a representative of Experian regarding obtaining credit reports.

b. In or about May 2008, PETER ROMEO, the defendant, applied for credit cards issued by Citibank, N.A., HSBC Bank USA, N.A., and JPMorgan Chase Bank, the deposits of which were insured by the Federal Deposit Insurance Corporation.

c. In or about June 2008, EDWIN MANSOUR, a/k/a "Edwin Perello," the defendant, opened a bank account in the name of New York Funding Group, Inc.

d. In or about July 2008, EDWIN J. MANSOUR, JR., a/k/a "Edwin Perello," the defendant, applied for credit cards issued by Citibank, N.A., HSBC Bank USA, N.A., and Discover Bank, the deposits of which were insured by the Federal Deposit Insurance Corporation.

e. On or about October 24, 2008, DENISE HUDSON, a/k/a "Denise Barnes," a/k/a "Patrice Brown," the defendant, called Experian to inquire about Highway Furniture's ability to obtain credit reports.

f. On or about November 25, 2008, EDWIN JACQUET, a/k/a "Carlton Exile," a/k/a "Donald Banks," a/k/a "Roger," the defendant, sent an e-mail regarding access to the E-Oscar system to a co-conspirator not named as a defendant herein, who was a Broker and who operated out of California.

g. In or about January 2009, a co-conspirator not named as a defendant herein, who was a Broker and who operated out of Westchester County, New York, sent an e-mail to



Highway Furniture inquiring about trade lines for clients of the Broker.

h. On or about January 6, 2010, EDWIN JACQUET, a/k/a "Carlton Exile," a/k/a "Donald Banks," a/k/a "Roger," the defendant, opened a mailbox at a commercial mail receiving agency in Manhattan.

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

**COUNT TWO**  
**(Conspiracy to Cause Damage to a Protected Computer)**

The Grand Jury further charges:

27. The allegations contained in paragraphs 1 through 23 and paragraph 26 of this Indictment are hereby realleged and incorporated by reference as though fully set forth herein.

28. From at least in or about 2007 through in or about at least 2010, in the Southern District of New York and elsewhere, EDWIN JACQUET, a/k/a "Carlton Exile," a/k/a "Donald Banks," a/k/a "Roger," PETER ROMEO, EDWIN J. MANSOUR, JR., a/k/a "Edwin Perello," and DENISE HUDSON, a/k/a "Denise Barnes," a/k/a "Patrice Brown," the defendants, and others known and unknown, willfully and knowingly did combine, conspire, confederate, and agree together and with others, to commit an offense against the United States, to wit, to violate Title 18, United States Code, Section 1030(a)(5)(A).

29. It was a part and an object of the conspiracy that EDWIN JACQUET, a/k/a "Carlton Exile," a/k/a "Donald Banks," a/k/a

"Roger," PETER ROMEO, EDWIN J. MANSOUR, JR., a/k/a "Edwin Perello," and DENISE HUDSON, a/k/a "Denise Barnes," a/k/a "Patrice Brown," the defendants, willfully and knowingly would and did cause the transmission of a program, information, code, and command, and as a result of such conduct, would and did intentionally cause damage without authorization to a protected computer and loss to one and more persons during any one-year period, and loss resulting from a related course of conduct affecting one and more other protected computers, aggregating at least \$5,000 in value, in violation of Title 18, United States Code, Sections 1030(a)(5)(A) and 1030(c)(4).

OVERT ACTS

30. In furtherance of the conspiracy and to effect the illegal object thereof, the following overt acts, among others, were committed and caused to be committed in the Southern District of New York and elsewhere:

a. On or about September 12, 2007, EDWIN JACQUET, a/k/a "Carlton Exile," a/k/a "Donald Banks," a/k/a "Roger," the defendant, spoke by telephone with a representative of Experian regarding obtaining credit reports.

b. In or about May 2008, PETER ROMEO, the defendant, applied for credit cards issued by Citibank, N.A., HSBC Bank USA, N.A., and JPMorgan Chase Bank, the deposits of which were insured by the Federal Deposit Insurance Corporation.

c. In or about June 2008, EDWIN MANSOUR, a/k/a "Edwin Perello," the defendant, opened a bank account in the name of New York Funding Group, Inc.

d. In or about July 2008, EDWIN J. MANSOUR, JR., a/k/a "Edwin Perello," the defendant, applied for credit cards issued by Citibank, N.A., HSBC Bank USA, N.A., and Discover Bank, the deposits of which were insured by the Federal Deposit Insurance Corporation.

e. On or about October 24, 2008, DENISE HUDSON, a/k/a "Denise Barnes," a/k/a "Patrice Brown," the defendant, called Experian to inquire about Highway Furniture's ability to obtain credit reports.

f. On or about November 25, 2008, EDWIN JACQUET, a/k/a "Carlton Exile," a/k/a "Donald Banks," a/k/a "Roger," the defendant, sent an e-mail regarding access to the E-Oscar system to a co-conspirator not named as a defendant herein, who was a Broker and who operated out of California.

g. In or about January 2009, a co-conspirator not named as a defendant herein, who was a Broker and who operated out of Westchester County, New York, sent an e-mail to Highway Furniture inquiring about trade lines for clients of the Broker.

h. On or about January 6, 2010, EDWIN JACQUET, a/k/a "Carlton Exile," a/k/a "Donald Banks," a/k/a "Roger," the

defendant, opened a mailbox at a commercial mail receiving agency in Manhattan.

(Title 18, United States Code,  
Sections 1030(a)(5)(A), 1030(b), and 1030(c)(4).)

**FORFEITURE ALLEGATION**  
**(As to Counts One and Two)**

31. As a result of committing one or more of the offenses alleged in Counts One and Two of this Indictment, EDWIN JACQUET, a/k/a "Carlton Exile," a/k/a "Donald Banks," a/k/a "Roger," PETER ROMEO, EDWIN J. MANSOUR, JR., a/k/a "Edwin Perello," and DENISE HUDSON, a/k/a "Denise Barnes," a/k/a "Patrice Brown," the defendants, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(2), all property constituting, or derived from, proceeds the defendants obtained directly or indirectly, as the result of these offenses, including but not limited to the following:

a. Approximately \$1 million in United States currency, in that such sum in aggregate is property representing the amount of proceeds obtained as a result of the offenses.

**SUBSTITUTE ASSETS PROVISION**

32. If any of the above-described forfeitable property, as a result of any act or omission of EDWIN JACQUET, a/k/a "Carlton Exile," a/k/a "Donald Banks," a/k/a "Roger," PETER ROMEO, EDWIN J. MANSOUR, JR., a/k/a "Edwin Perello," and DENISE

HUDSON, a/k/a "Denise Barnes," a/k/a "Patrice Brown," the defendants:

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

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

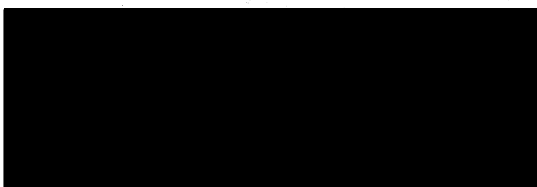
c. has been placed beyond the jurisdiction of the Court;

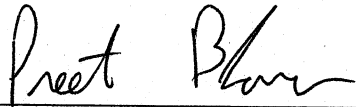
d. has been substantially diminished in value; or

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), to seek forfeiture of any other property of the defendants up to the value of the above forfeitable property.

(Title 18, United States Code, Sections 982(a)(2) and (b); and Title 21, United States Code, Section 853(p).)



  
PREET BHARARA JK  
UNITED STATES ATTORNEY

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

-v.-

EDWIN JACQUET,  
a/k/a "Carlton Exile,"  
a/k/a "Donald Banks," a/k/a "Roger,"  
PETER ROMEO,  
EDWIN J. MANSOUR, JR.,  
a/k/a "Edwin Perello," and  
DENISE HUDSON,  
a/k/a "Denise Barnes,"  
a/k/a "Patrice Brown,"

Defendants.

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INDICTMENT

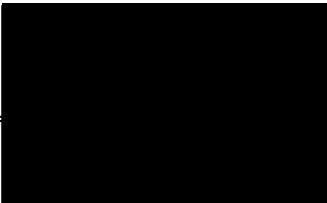
11 Cr. \_\_\_\_\_ (\_\_\_\_\_)

(Title 18, United States Code,  
Sections 1349, 1030(a)(5)(A),  
1030(b), and 1030(c)(4).)

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PREET BHARARA  
United States Attorney.

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