

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 10-80107-CR-Horley/Vitunac

18 U.S.C §1349
18 U.S.C §1344
18 U.S.C. §1028
18 U.S.C. §1028A
18 U.S.C. §2
18 U.S.C. § 982
21 U.S.C. §853

UNITED STATES OF AMERICA,

Plaintiff,

v.

VERNE EDWARD BELL,
a/k/a "Doc,"
MICHAEL ANGELO MERCADO,
RYAN PATRICK SULLIVAN,
a/k/a "Sully,"
GREGORY CHARLES LENOX,
ILEANA MARIA MARTINEZ,
ERLON ABRAAO MONTEIRO, and
VERNON ANTONIO TAYLOR

Defendants.

FILED by jm D.C.

AUG - 5 2010

STEVEN M. LARIMORE
CLERK U.S. DIST. CT.
S.D. OF FLA. - W.P.B.

INDICTMENT

The Grand Jury charges that:

GENERAL ALLEGATIONS

At all times relevant to this indictment:

1. Wachovia Bank, National Association, a Wells Fargo Company, was a financial institution with offices in the State of Florida whose accounts were insured by the Federal Deposit Insurance Corporation.

2. U.S. Mortgage of Florida was a financial institution with offices in the State of Florida that was a mortgage lending business making federally related mortgage loans.

COUNT 1
CONSPIRACY TO COMMIT FRAUD ON A FINANCIAL INSTITUTION
(18 U.S.C. §1349)

3. Paragraphs 1 and 2 of the General Allegations section of this Indictment are realleged and incorporated by reference as though fully set forth herein.

4. On a date unknown to the Grand Jury but beginning at least as early as on or about June 15, 2010, through on or about July 21, 2010, in Palm Beach County, in the Southern District of Florida, and elsewhere, the defendants,

VERNE EDWARD BELL,
a/k/a "Doc,"
MICHAEL ANGELO MERCADO,
RYAN PATRICK SULLIVAN,
a/k/a "Sully,"
GREGORY CHARLES LENOX,
ILEANA MARIA MARTINEZ,
ERLON ABRAAO MONTEIRO, and
VERNON ANTONIO TAYLOR,

did knowingly and willfully combine, conspire, confederate, agree and reach a tacit understanding with other persons known and unknown to the Grand Jury to commit the offense of fraud on a financial institution, in violation of Title 18, United States Code, Section 1344.

OBJECT AND PURPOSE OF THE CONSPIRACY

5. It was the object and purpose of the conspiracy for the defendants to unlawfully enrich themselves by, among other things, using the names and identities of real people, in the form of false identification documents, without their permission to obtain lines

of credit or loans from financial institutions and thereafter access those lines of credit or loans to obtain money.

MANNER AND MEANS OF THE CONSPIRACY

6. The manner and means by which the defendants sought to accomplish the object and purpose of the conspiracy included, among other things, the following:

a. **VERNE EDWARD BELL** and **RYAN PATRICK SULLIVAN** created false driver's licenses, false United States Social Security cards and false Michigan birth certificates utilizing identification information belonging to real people and pictures of people other than the true owner of the information for **RYAN PATRICK SULLIVAN, GREGORY CHARLES LENOX, ILEANA MARIA MARTINEZ, ERLON ABRAAO MONTEIRO** and other people known and unknown to the grand jury.

b. **VERNON ANTONIO TAYLOR** created graphics and templates for false identification documents including what purported to be driver's licenses for the states of Michigan, California, New York, Texas and Florida, and United States Social Security cards.

c. **MICHAEL ANGELO MERCADO** sold false identification documents, including false driver's licenses, false United States Social Security cards, and false Michigan birth certificates, which were created by **VERNE EDWARD BELL** and **RYAN PATRICK SULLIVAN**, on one or more occasions.

d. **VERNE EDWARD BELL** provided identification information belonging to real people to the individuals for whom he created the false identification documents including **RYAN PATRICK SULLIVAN, GREGORY CHARLES LENOX, ILEANA MARIA**

MARTINEZ, ERLON ABRAAO MONTEIRO and persons known and unknown to the Grand Jury for the purpose of applying for lines of credit and other loans from financial institutions.

e. **RYAN PATRICK SULLIVAN** completed and signed one or more applications for credit or loans from one or more financial institutions in the name of a person whose initials are "M.J." and others which had been provided to him.

f. **GREGORY CHARLES LENOX** completed and signed one or more applications for credit or loans from one or more financial institutions in the name of a person whose initials are "A.N." and others which had been provided to him.

g. **ILEANA MARIA MARTINEZ**, completed and signed one or more applications for credit or loans from one or more financial institutions in the name of a person whose initials are "G.R." and others which had been provided to her.

h. **ERLON ABRAAO MONTEIRO** completed and signed one or more applications for credit or loans from one or more financial institutions in the name of a person whose initials are "R.B." and others which had been provided to him.

i. **VERNE EDWARD BELL, MICHAEL ANGELO MERCADO, RYAN PATRICK SULLIVAN, GREGORY CHARLES LENOX, ILEANA MARIA MARTINEZ, and ERLON ABRAAO MONTEIRO** agreed to divide the proceeds of the lines of credit or loans amongst themselves and with others known and unknown to the Grand Jury.

All in violation of Title 18, United States Code, Section 1349.

COUNTS 2 THROUGH 6
FRAUD ON A FINANCIAL INSTITUTION
(18 U.S.C. §1344)

7. Paragraphs 1 and 2 of the General Allegations section of this indictment are realleged and incorporated by reference as though fully set forth herein.

8. Beginning at least as early as on or about June 15, 2010, through on or about July 21, 2010, in Palm Beach County, in the Southern District of Florida, and elsewhere, the defendants,

VERNE EDWARD BELL,
a/k/a "Doc,"
MICHAEL ANGELO MERCADO,
RYAN PATRICK SULLIVAN,
a/k/a "Sully,"
GREGORY CHARLES LENOX,
ILEANA MARIA MARTINEZ,
ERLON ABRAAO MONTEIRO, and
VERNON ANTONIO TAYLOR,

did knowingly, and with intent to defraud, execute, attempt to execute, and cause the execution of, a scheme and artifice to defraud one or more financial institutions and to obtain monies, funds, assets and other property owned by, and under the custody and control of, said financial institutions, by means of materially false and fraudulent pretenses, representations and promises.

OBJECT AND PURPOSE OF THE SCHEME TO DEFRAUD

9. It was the object and purpose of the scheme to defraud for the defendants to unlawfully enrich themselves by, among other things, using the names and identities of real people, in the form of false identification documents, without their permission to obtain lines of credit or loans from financial institutions and thereafter access those lines of credit

or loans to obtain money.

THE SCHEME AND ARTIFICE

10. The allegations at paragraph 6 of Count 1 of this Indictment are realleged and incorporated herein by reference as a description of the scheme and artifice, as well as a description of the material falsehoods through which the scheme and artifice was conducted.

EXECUTION OF THE SCHEME TO DEFRAUD

11. On or about the dates specified as to each Count, the defendants listed in each count below did execute and attempt to execute the scheme and artifice to defraud, and did attempt to cause said scheme and artifice to be executed, as more particularly described below:

COUNT	DATE	DEFENDANTS	DESCRIPTION OF ACT IN EXECUTION OF THE SCHEME AND ARTIFICE
2	July 9, 2010	VERNE EDWARD BELL, MICHAEL ANGELO MERCADO, RYAN PATRICK SULLIVAN, GREGORY CHARLES LENOX, ILEANA MARIA MARTINEZ and VERNON ANTONIO TAYLOR	Completion of an application for a line of credit at Wachovia Bank, National Association, a Wells Fargo Company, in the name of a person known as "A.N."
3	July 9, 2010	VERNE EDWARD BELL, MICHAEL ANGELO MERCADO, RYAN PATRICK SULLIVAN, GREGORY CHARLES LENOX, ILEANA MARIA MARTINEZ, and VERNON ANTONIO TAYLOR	Completion of an application for a line of credit at Wachovia Bank, National Association, a Wells Fargo Company, in the name of a person known as "G.R."

COUNT	DATE	DEFENDANTS	DESCRIPTION OF ACT IN EXECUTION OF THE SCHEME AND ARTIFICE
4	July 9, 2010	VERNE EDWARD BELL, MICHAEL ANGELO MERCADO, RYAN PATRICK SULLIVAN, GREGORY CHARLES LENOX, ILEANA MARIA MARTINEZ, ERLON ABRAAO MONTEIRO, and VERNON ANTONIO TAYLOR	Completion of an application for a line of credit at Wachovia Bank, National Association, a Wells Fargo Company, in the name of a person known as "R.B."
5	July 15, 2010	VERNE EDWARD BELL, MICHAEL ANGELO MERCADO, RYAN PATRICK SULLIVAN, GREGORY CHARLES LENOX ILEANA MARIA MARTINEZ, and VERNON ANTONIO TAYLOR	Completion of an application for a Federal Housing Administration mortgage at U.S. Mortgage of Florida, in the name of a person known as "G.R."
6	July 21, 2010	VERNE EDWARD BELL, MICHAEL ANGELO MERCADO, RYAN PATRICK SULLIVAN, GREGORY CHARLES LENOX ILEANA MARIA MARTINEZ, and VERNON ANTONIO TAYLOR	Completion of an application for a line of credit at Wachovia Bank, National Association, a Wells Fargo Company, in the name of a person known as "M.J."

All in violation of Title 18, United States Code, Sections 1344(1), 1344(2) and 2.

COUNTS 7 THROUGH 20
IDENTITY FRAUD
18 U.S.C. §1028(a)(7)

12. On a date unknown to the Grand Jury but beginning at least as early as on or about June 15, 2010, through on or about July 21, 2010, in Palm Beach County, in the Southern District of Florida, and elsewhere, the defendants did knowingly transfer, possess and use, in or affecting interstate commerce, without lawful authority, a means of identification of another person, with the intent to commit, or to aid or abet the commission

of an unlawful activity that constitutes a violation of Federal Law, that is, violations of Title 18, United States Code, Section 1349, conspiracy to commit fraud on a financial institution as set forth in Count 1 and Title 18, United States Code, Section 1344, attempted fraud on a financial institution as set forth in Counts 2 through 6, as specified below:

COUNT	DEFENDANTS	IDENTIFICATION
7	VERNE EDWARD BELL, MICHAEL ANGELO MERCADO, RYAN PATRICK SULLIVAN, GREGORY CHARLES LENOX, ILEANA MARIA MARTINEZ and VERNON ANTONIO TAYLOR	New York Driver License, Michigan Birth Certificate, and a Social Security Card in the name of T.O'C.
8	VERNE EDWARD BELL, MICHAEL ANGELO MERCADO, RYAN PATRICK SULLIVAN, GREGORY CHARLES LENOX, ILEANA MARIA MARTINEZ and VERNON ANTONIO TAYLOR	Florida Driver License, Michigan Birth Certificate, and a Social Security Card in the name of G.M.
9	VERNE EDWARD BELL, MICHAEL ANGELO MERCADO, RYAN PATRICK SULLIVAN, GREGORY CHARLES LENOX, ILEANA MARIA MARTINEZ and VERNON ANTONIO TAYLOR	Florida Driver License, Michigan Birth Certificate and a Social Security Card in the name of R.J.
10	VERNE EDWARD BELL, MICHAEL ANGELO MERCADO, RYAN PATRICK SULLIVAN, GREGORY CHARLES LENOX, ILEANA MARIA MARTINEZ and VERNON ANTONIO TAYLOR	Florida Driver License, Michigan Birth Certificate and a Social Security Card in the name of T.R.
11	VERNE EDWARD BELL, MICHAEL ANGELO MERCADO, RYAN PATRICK SULLIVAN, GREGORY CHARLES LENOX, ILEANA MARIA MARTINEZ and VERNON ANTONIO TAYLOR	Florida Driver License, Michigan Birth Certificate and a Social Security Card in the name of V.W.

COUNT	DEFENDANTS	IDENTIFICATION
12	VERNE EDWARD BELL, MICHAEL ANGELO MERCADO, RYAN PATRICK SULLIVAN, GREGORY CHARLES LENOX, ILEANA MARIA MARTINEZ and VERNON ANTONIO TAYLOR	Florida Driver License, Michigan Birth Certificate and a Social Security Card in the name of J.C.
13	VERNE EDWARD BELL, MICHAEL ANGELO MERCADO, RYAN PATRICK SULLIVAN, GREGORY CHARLES LENOX, ILEANA MARIA MARTINEZ and VERNON ANTONIO TAYLOR	Florida Driver License, Michigan Birth Certificate and a Social Security Card the name of D.C.
14	VERNE EDWARD BELL, MICHAEL ANGELO MERCADO, RYAN PATRICK SULLIVAN, GREGORY CHARLES LENOX, ILEANA MARIA MARTINEZ, and VERNON ANTONIO TAYLOR	Florida Driver License, and a Social Security Card in the name of A.N.
15	VERNE EDWARD BELL, MICHAEL ANGELO MERCADO, RYAN PATRICK SULLIVAN, GREGORY CHARLES LENOX, ILEANA MARIA MARTINEZ, and VERNON ANTONIO TAYLOR	Florida Driver License, and a Social Security Card in name of G.R.
16	VERNE EDWARD BELL, MICHAEL ANGELO MERCADO, RYAN PATRICK SULLIVAN, ERLON ABRAAO MONTEIRO, GREGORY CHARLES LENOX, ILEANA MARIA MARTINEZ, and VERNON ANTONIO TAYLOR	Florida Driver License and a Social Security Card in the name of R.B.
17	VERNE EDWARD BELL, MICHAEL ANGELO MERCADO, RYAN PATRICK SULLIVAN, GREGORY CHARLES LENOX, ILEANA MARIA MARTINEZ, and VERNON ANTONIO TAYLOR	Florida Driver License, Michigan Birth Certificate and a Social Security Card in the name of Y.G.

COUNT	DEFENDANTS	IDENTIFICATION
18	VERNE EDWARD BELL, MICHAEL ANGELO MERCADO, RYAN PATRICK SULLIVAN, ERLON ABRAAO MONTEIRO, GREGORY CHARLES LENOX, ILEANA MARIA MARTINEZ, and VERNON ANTONIO TAYLOR	California Driver License and a Social Security Card in the name of C.D.
19	VERNE EDWARD BELL, MICHAEL ANGELO MERCADO, RYAN PATRICK SULLIVAN, GREGORY CHARLES LENOX, ILEANA MARIA MARTINEZ, and VERNON ANTONIO TAYLOR	Michigan Driver License in the name of A.R.
20	VERNE EDWARD BELL, MICHAEL ANGELO MERCADO, RYAN PATRICK SULLIVAN, GREGORY CHARLES LENOX, ILEANA MARIA MARTINEZ, and VERNON ANTONIO TAYLOR	Florida Driver License and a Social Security Card in the name of M.J.

All in violation of Title 18, United States Code, Section 1028(a)(7), 1028(b)(1)(A)(ii) and 2.

**COUNTS 21 THROUGH 22
AGGRAVATED IDENTITY THEFT
18 U.S.C. §1028A(a)(1)**

13. On a date unknown to the Grand Jury but beginning at least as early as on or about June 15, 2010, through on or about July 21, 2010, in Palm Beach County, in the Southern District of Florida, and elsewhere, the defendants, during and in relation to felony violations of Title 18, United States Code, Section 1344, that is attempted fraud on a financial institution, did knowingly transfer, possess and use without lawful authority, a means of identification of another person, as specified below:

COUNT	DEFENDANTS	IDENTIFICATION	FELONY VIOLATION
21	VERNE EDWARD BELL, MICHAEL ANGELO MERCADO, RYAN PATRICK SULLIVAN, GREGORY CHARLES LENOX, and ILEANA MARIA MARTINEZ	Florida Driver License, and a Social Security Card in name of G.R.	Counts 3, 5 and 7
22	VERNE EDWARD BELL, MICHAEL ANGELO MERCADO, RYAN PATRICK SULLIVAN, GREGORY CHARLES LENOX, ILEANA MARIA MARTINEZ, and ERLON ABRAAO MONTEIRO	Florida Driver License and a Social Security Card in the name of R.B.	Count 4 and 7

All in violation of Title 18, United States Code, Sections 1028A(a)(1) and 2.

CRIMINAL FORFEITURE

Forfeiture 1:

Upon conviction of the violations alleged in Counts 1 through 20 of this Indictment, the defendants **VERNE EDWARD BELL, a/k/a "Doc," MICHAEL ANGELO MERCADO, RYAN PATRICK SULLIVAN, a/k/a "Sully," GREGORY CHARLES LENOX, ILEANA MARIA MARTINEZ, ERLON ABRAAO MONTEIRO, and VERNON ANTONIO TAYLOR,** shall forfeit to the United States any property constituting, or derived from, proceeds obtained directly or indirectly as a result of the said violation.

Pursuant to Title 18, United States Code, Section 982(a)(2).

If any of the forfeitable property described in the forfeiture section of this indictment, as a result of any act or omission of the defendants **VERNE EDWARD BELL, a/k/a**

“Doc,” MICHAEL ANGELO MERCADO, RYAN PATRICK SULLIVAN, a/k/a “Sully,” GREGORY CHARLES LENOX, ILEANA MARIA MARTINEZ, ERLON ABRAAO MONTEIRO, and VERNON ANTONIO TAYLOR,

- (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), as incorporated by Title 18, United States Code, Section 982(b)(1), to seek forfeiture of any other property of the defendants up to the value of the above forfeitable property.

All pursuant to Title 18 United States Code, Section 982 and Title 21 United States Code, Section 853.

Forfeiture 2:

Upon conviction of the violations alleged in Counts 7 through 20 of this indictment, the defendants **VERNE EDWARD BELL, a/k/a “Doc,” MICHAEL ANGELO MERCADO, RYAN PATRICK SULLIVAN, a/k/a “Sully,” GREGORY CHARLES LENOX, ILEANA MARIA MARTINEZ, ERLON ABRAAO MONTEIRO, and VERNON ANTONIO TAYLOR** shall forfeit to the United States any personal property used or intended to be used to commit the offense.

Pursuant to Title 18, United States Code, Sections 1028(b)(5) and 1029(c)(1)(C).

If any of the forfeitable property described in the forfeiture section of this indictment, as a result of any act or omission of the defendants **VERNE EDWARD BELL, a/k/a "Doc,"** **MICHAEL ANGELO MERCADO, RYAN PATRICK SULLIVAN, a/k/a "Sully,"** **GREGORY CHARLES LENOX, ILEANA MARIA MARTINEZ, ERLON ABRAAO MONTEIRO, and** **VERNON ANTONIO TAYLOR,**

- (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), as incorporated by Title 18, United States Code, Sections 1028(g) and 1029(c)(2), to seek forfeiture of any other property of the defendants up to the value of the above forfeitable property.

All pursuant to Title 18 United States Code, Sections 1028(b) and 1029(c) and Title 21 United States Code, Section 853.

A TRUE BILL _____



WIFREDO A. FERRER
UNITED STATES ATTORNEY



ELLEN L. COHEN
ASSISTANT UNITED STATES ATTORNEY

FOREPERSON