

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
11-60005-CR-COHN/SELTZER
CASE NO. _____

18 U.S.C. § 215(a)(2)

UNITED STATES OF AMERICA,

Plaintiff,

vs.

CHRISTOPHER BROOKS,

Defendant.

INFORMATION

The United States Attorney charges that:

GENERAL ALLEGATIONS

At all times relevant to this Information:

1. Bank of America, N.A. was a financial institution whose accounts were insured by the Federal Deposit Insurance Corporation.
2. Defendant **CHRISTOPHER BROOKS** was an employee of Bank of America.

COUNT 1

(Receipt of a Bribe by a Bank Employee: 18 USCA §215(a)(2))

3. Paragraphs 1 and 2 of the General Allegations section of this Information are realleged and incorporated as though fully set forth herein.
4. On or about January 27, 2009, in Broward County, in the Southern District of Florida, and elsewhere, the defendant,

CHRISTOPHER BROOKS,

corruptly accepted and agreed to accept a thing of value, that is, \$1,000 in United States currency, from a person, intending to be influenced and rewarded in connection with any transaction and business of Bank of America, in that the defendant agreed to and did list an individual as a Bank of America account owner knowing that he was not the true account owner and then did create a false Bank of America Verification of Deposit form for that individual to assist him with obtaining a fraudulent mortgage.

All in violation of Title 18, United States Code, Section 215(a)(2)

COUNT 2

(Receipt of a Bribe by a Bank Employee: 18 USCA §215(a)(2))

5. Paragraphs 1 and 2 of the General Allegations section of this Information are realleged and incorporated as though fully set forth herein.

6. On or about February 10, 2009, in Broward County, in the Southern District of Florida, and elsewhere, the defendant,

CHRISTOPHER BROOKS,

corruptly accepted and agreed to accept a thing of value, that is, \$1,100 in United States currency, from a person, intending to be influenced and rewarded in connection with any transaction and business of Bank of America, in that the defendant agreed to and did list an individual as a Bank of America account owner knowing that he was not the true account owner and then did create a false Bank of America Verification of Deposit form for that individual to assist him with obtaining a fraudulent mortgage.

All in violation of Title 18, United States Code, Section 215(a)(2)

COUNT 3

(Receipt of a Bribe by a Bank Employee: 18 USCA §215(a)(2))

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

8. On or about March 31, 2009, in Broward County, in the Southern District of Florida, and elsewhere, the defendant,

CHRISTOPHER BROOKS,

corruptly accepted and agreed to accept a thing of value, that is, \$2,000 in United States currency and two tickets to a sporting event, from a person, intending to be influenced and rewarded in connection with any transaction and business of Bank of America, in that the defendant agreed to and did list an individual as a Bank of America account owner knowing that he was not the true account owner and then did create a false Bank of America Verification of Deposit form for that individual to assist him with obtaining a fraudulent mortgage.

All in violation of Title 18, United States Code, Section 215(a)(2)

COUNT 4

(Receipt of a Bribe by a Bank Employee: 18 USCA §215(a)(2))

9. Paragraphs 1 and 2 of the General Allegations section of this Information are realleged and incorporated as though fully set forth herein.

10. On or about April 3, 2009, in Broward County, in the Southern District of Florida, and elsewhere, the defendant,

CHRISTOPHER BROOKS,

corruptly accepted and agreed to accept a thing of value, that is, \$500 in United States currency, from a person, intending to be influenced and rewarded in connection with any transaction and business

of Bank of America, in that the defendant agreed to and did list an individual as a Bank of America account owner knowing that he was not the true account owner and then did create a false Bank of America Verification of Deposit form for that individual to assist him with obtaining a fraudulent mortgage.

All in violation of Title 18, United States Code, Section 215(a)(2)



WIFREDO A. FERRER
UNITED STATES ATTORNEY



ELLEN COHEN
ASSISTANT UNITED STATES ATTORNEY

UNITED STATES OF AMERICA

CASE NO.

11-60005-CR-COHN/SELTZER

vs.

CERTIFICATE OF TRIAL ATTORNEY*

CHRISTOPHER BROOKS,

Defendant.

Superseding Case Information:

Court Division: (Select One)

New Defendant(s)

Yes _____ No _____

X Miami _____ Key West _____
FTL _____ WPB _____ FTP _____

Number of New Defendants _____
Total number of counts _____

I do hereby certify that:

1. I have carefully considered the allegations of the indictment, the number of defendants, the number of probable witnesses and the legal complexities of the Indictment/Information attached hereto.

2. I am aware that the information supplied on this statement will be relied upon by the Judges of this Court in setting their calendars and scheduling criminal trials under the mandate of the Speedy Trial Act, Title 28 U.S.C. Section 3161.

3. Interpreter: (Yes or No) No
List language and/or dialect _____

4. This case will take 5 days for the parties to try.

5. Please check appropriate category and type of offense listed below:

	(Check only one)		(Check only one)
I	0 to 5 days	<u>X</u>	Petty
II	6 to 10 days	_____	Minor
III	11 to 20 days	_____	Misdem.
IV	21 to 60 days	_____	Felony
V	61 days and over	_____	

6. Has this case been previously filed in this District Court? (Yes or No) No

If yes:
Judge: _____ Case No. _____

(Attach copy of dispositive order)
Has a complaint been filed in this matter? (Yes or No) No

If yes:
Magistrate Case No. _____

Related Miscellaneous numbers: _____

Defendant(s) in federal custody as of _____

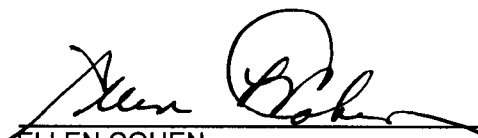
Defendant(s) in state custody as of _____

Rule 20 from the _____ District of _____

Is this a potential death penalty case? (Yes or No) No

7. Does this case originate from a matter pending in the Northern Region of the U.S. Attorney's Office prior to October 14, 2003? _____ Yes No No

8. Does this case originate from a matter pending in the Central Region of the U.S. Attorney's Office prior to September 1, 2007? _____ Yes No No


ELLEN COHEN
ASSISTANT UNITED STATES ATTORNEY
Bar No.: 0739472

*Penalty Sheet(s) attached

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: CHRISTOPHER BROOKS

Case No: 11-60005-CR-COHN/SELTZER

Count #s: 1 and 4

Receipt of a Bribe by a Bank Employee (Class A Misdemeanor)

18 U.S.C.A. § 215(a)(2)

* Max. Penalty: Up to 1 year incarceration; up to \$100,000 fine, and up to 1 year supervised release.

Count #s: 2 and 3

Receipt of a Bribe by a Bank Employee (Class B Felony)

* Max. Penalty Up to 30 years incarceration; up to \$1,000,000 fine; and up to 5 years supervised release.

***Refers only to possible term of incarceration, does not include possible fines, restitution, special assessments, parole terms, or forfeitures that may be applicable.**

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

CASE NUMBER: 11-60005-QR-COHN/SEITZER

BOND RECOMMENDATION

DEFENDANT: CHRISTOPHER BROOKS

\$50,000 Personal Surety Bond

(Personal Surety) (Corporate Surety) (Cash) (Pre-Trial Detention)

By: 
AUSA: Ellen Cohen

Last Known Address: _____

What Facility: _____

Agent(s): Daniel Szczepanski, S/A

(FBI) (SECRET SERVICE) (DEA) (IRS) (ICE) (OTHER)

Federal Bureau of Investigation