

STATE OF INDIANA,
MARION COUNTY, ss:

) IN THE MARION SUPERIOR COURT
) CRIMINAL DIVISION
)
)
)

) INFORMATION
)

THE STATE OF INDIANA

) COUNT I
) IDENTITY DECEPTION
) CLASS C FELONY
) I.C. 35-43-5-3.5
)

vs.

JASON L. KEIGLEY,
DEFENDANT

) COUNT II
) FRAUD ON A FINANCIAL
) INSTITUTION
) CLASS C FELONY
) I.C. 35-43-5-8
)

w/m, DOB 7/21/1972

CAUSE NO.

) COUNTS III, V, VII, IX, XI,
) XIII
) UNLICENSED LOAN BROKER
) CLASS D FELONY
) I.C. 23-2-5-4
) I.C. 23-2-5-16
)

) COUNTS IV, VI, VIII, X, XII
) LOAN BROKER FRAUD
) CLASS D FELONY
) I.C. 23-2-5-20
) I.C. 23-2-5-16
)

) COUNT XIII
) CREDIT CARD FRAUD
) CLASS D FELONY
) IC. 35-43-5-4
)

On this date, Investigator Charles P. Williams came before the Prosecuting Attorney of the Nineteenth Judicial Circuit and, being duly sworn (or having affirmed), stated that in Marion County, Indiana:

COUNT I: IDENTITY DECEPTION

On or about May 26, 2005, JASON L. KEIGLEY knowingly used the identifying information of another person, that is, Jeri Ann

Jones, without the consent of Jeri Ann Jones and with the intent to harm or defraud Jeri Ann Jones, and/or assume the identity of Jeri Ann Jones, and/or professing to be Jeri Ann Jones, and the fair market value of the fraud or harm caused by the offense was at least \$50,000;

COUNT II: FRAUD ON A FINANCIAL INSTITUTION

On or about May 26, 2005, JASON L. KEIGLEY, knowingly executed a scheme to defraud a state or federally chartered or federally insured financial institution, that is: Capital One;

COUNT III: UNLICENSED LOAN BROKER

On or about October 10, 2005, Jason Keigley did knowingly engage in the loan brokerage business in Indiana without having first obtained a license from the Indiana Securities Commissioner, specifically: Jason Keigley solicited Brina G. Vidal for the purposes of procuring a loan on her behalf;

COUNT IV: LOAN BROKER FRAUD

On or about October 10, 2005, JASON L. KEIGLEY directly or indirectly, employed a scheme to defraud, made untrue statements of a material fact, omitted to state material facts necessary to make the statements made not misleading, engaged in an act, practice or course of business that operated as a fraud or deceit, or collected or solicited consideration, that was not a

bona fide third party fee, in connection with a loan until the loan had been closed. To-wit: JASON L. KEIGLEY, procured a mortgage loan for BRINA G. VIDAL, and JASON L. KEIGLEY failed to disclose that JASON L. KEIGLEY was not licensed to broker loans on October 10, 2005;

COUNT V: UNLICENSED LOAN BROKER

On or about March 31, 2006, JASON L. KEIGLEY did knowingly engage or continue in the loan brokerage business without applying to the Commissioner of the Indiana Securities Division for a license, as required by law, when JASON L. KEIGLEY, solicited GEORGE W. PAYNE, III, for the purpose of procuring a loan, and JASON L. KEIGLEY was not licensed with the Indiana Secretary of State, Securities Division, to broker loans on March 31, 2006;

COUNT VI: LOAN BROKER FRAUD

In or about March 2006, JASON L. KEIGLEY directly or indirectly, employed a scheme to defraud, made untrue statements of a material fact, omitted to state material facts necessary to make the statements made not misleading, engaged in an act, practice or course of business that operated as a fraud or deceit, or collected or solicited consideration, that was not a bona fide third party fee, in connection with a loan until the loan had been closed. To-wit: JASON L. KEIGLEY, procured a

mortgage loan for GEORGE W. PAYNE, III, and JASON L. KEIGLEY failed to disclose that JASON L. KEIGLEY was not licensed to broker loans in March 2006;

COUNT VII: UNLICENSED LOAN BROKER

On or about July 18, 2006, JASON L. KEIGLEY did knowingly engage or continue in the loan brokerage business without applying to the Commissioner of the Indiana Securities Division for a license, as required by law, when JASON L. KEIGLEY, solicited Gary Hippensteel, for the purpose of procuring a loan, and JASON L. KEIGLEY was not licensed with the Indiana Secretary of State, Securities Division, to broker loans on July 18, 2006;

COUNT VIII: LOAN BROKER FRAUD

On or about July 18, 2006, JASON L. KEIGLEY directly or indirectly, employed a scheme to defraud, made untrue statements of a material fact, omitted to state material facts necessary to make the statements made not misleading, engaged in an act, practice or course of business that operated as a fraud or deceit, or collected or solicited consideration, that was not a bona fide third party fee, in connection with a loan until the loan had been closed. To-wit: JASON L. KEIGLEY, procured a mortgage loan for Gary Hippensteel, and JASON L. KEIGLEY failed to disclose that JASON L. KEIGLEY was not licensed to broker loans on July 18, 2006;

COUNT IX: UNLICENSED LOAN BROKER

On or about October 7, 2005, JASON L. KEIGLEY did knowingly engage or continue in the loan brokerage business without applying to the Commissioner of the Indiana Securities Division for a license, as required by law, when JASON L. KEIGLEY, solicited Ralph Bays, for the purpose of procuring a loan, and JASON L. KEIGLEY was not licensed with the Indiana Secretary of State, Securities Division, to broker loans on October 7, 2005;

COUNT X: LOAN BROKER FRAUD

On or about October 7, 2005, JASON L. KEIGLEY directly or indirectly, employed a scheme to defraud, made untrue statements of a material fact, omitted to state material facts necessary to make the statements made not misleading, engaged in an act, practice or course of business that operated as a fraud or deceit, or collected or solicited consideration, that was not a bona fide third party fee, in connection with a loan until the loan had been closed. To-wit: JASON L. KEIGLEY, procured a mortgage loan for Ralph Bays, and JASON L. KEIGLEY failed to disclose that JASON L. KEIGLEY was not licensed to broker loans on October 7, 2005;

COUNT XI: UNLICENSED LOAN BROKER

Between January 1, 2006 and February 28, 2006, JASON L. KEIGLEY did knowingly engage or continue in the loan brokerage business without applying to the Commissioner of the Indiana Securities Division for a license, as required by law, when JASON L. KEIGLEY, solicited George R. Williams, for the purpose of procuring a loan, and JASON L. KEIGLEY was not licensed with the Indiana Secretary of State, Securities Division, to broker loans between January 1, 2006 and February 28, 2006;

COUNT XII: LOAN BROKER FRAUD

Between January 1, 2006 and February 28, 2006, JASON L. KEIGLEY directly or indirectly, employed a scheme to defraud, made untrue statements of a material fact, omitted to state material facts necessary to make the statements made not misleading, engaged in an act, practice or course of business that operated as a fraud or deceit, or collected or solicited consideration, that was not a bona fide third party fee, in connection with a loan until the loan had been closed. To-wit: JASON L. KEIGLEY, procured a mortgage loan for George R. Williams, and JASON L. KEIGLEY failed to disclose that JASON L. KEIGLEY was not licensed to broker loans on between January 1, 2006 and February 28, 2006;

COUNT XIII: UNLICENSED LOAN BROKER

On or about March 6, 2007, JASON L. KEIGLEY did knowingly engage or continue in the loan brokerage business without applying to the Commissioner of the Indiana Securities Division for a license, as required by law, when JASON L. KEIGLEY, solicited Wanda Preston, for the purpose of procuring a loan, and JASON L. KEIGLEY was not licensed with the Indiana Secretary of State, Securities Division, to broker loans on March 6, 2007;

COUNT XIV: LOAN BROKER FRAUD

On or about March 6, 2007, JASON L. KEIGLEY directly or indirectly, employed a scheme to defraud, made untrue statements of a material fact, omitted to state material facts necessary to make the statements made not misleading, engaged in an act, practice or course of business that operated as a fraud or deceit, or collected or solicited consideration, that was not a bona fide third party fee, in connection with a loan until the loan had been closed. To-wit: JASON L. KEIGLEY, procured a mortgage loan for Wanda Preston, and JASON L. KEIGLEY failed to disclose that JASON L. KEIGLEY was not licensed to broker loans on March 6, 2007;

COUNT XV: CREDIT CARD FRAUD

On or between the dates of June 27, 2005, and April 28, 2006, JASON L. KEIGLEY, with intent to defraud, obtained

property by using a credit card issued by CAPITAL ONE in the name of "Charles Lambert, Jr." knowing that the credit card was unlawfully obtained or retained;

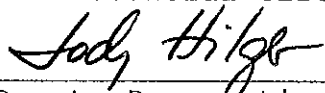
all of which is contrary to statute and against the peace and dignity of the State of Indiana.

I swear or affirm under penalty of perjury as specified by IC. 35-44-2-1 that the foregoing representations are true.

Affiant

February 20, 2009
Date

CARL J. BRIZZI
Marion County Prosecutor
19th Judicial Circuit



Deputy Prosecuting Attorney

State's Witnesses:

Charles Williams

Kim Haskins

Jeri Ann Jones

Brina G. Vidal

George W. Payne III

Gary Hippensteel

Ralph Bays

George R. Williams

Wanda Preston

Charles Lambert, Jr.

AFFIDAVIT OF PROBABLE CAUSE

The undersigned, Charles P. Williams, being first duly sworn upon his oath, deposes and says upon information and belief that JASON L. KEIGLEY ("KEIGLEY"), a resident of the State of Indiana, has committed the following crimes: Identity Deception (Class C Felony); Fraud on a Financial Institution (Class C Felony); Unlicensed Loan Broker (Class D Felony); Loan Broker Fraud (Class D Felony); and Credit Card Fraud (Class D Felony).

In support thereof, Charles P. Williams says as follows:

I am an investigator with the Indiana Secretary of State, Securities Division. I became involved in an investigation of KEIGLEY's alleged violations of the Indiana Securities Act, Indiana Code 23-19-1 *et. seq.*, and/or the Indiana Loan Broker Act, Indiana Code, 23-2-5 *et. seq.*

Identity Deception and Fraud on a Financial Institution

On or about May 26, 2005, KEIGLEY obtained a loan in the amount of FIFTY THOUSAND DOLLARS (\$50,000.00) from CAPITAL ONE SMALL BUSINESS SERVICES ("CAPITAL ONE"). However, KEIGLEY did not use his own name in obtaining this loan from CAPITAL ONE. Instead, KEIGLEY obtained the loan by submitting an application to CAPITAL ONE in the name of JERI A. JONES ("JONES"). KEIGLEY met JONES when she became a customer of his business, 1ST PLACE MORTGAGE, INC. ("1ST PLACE"). JONES' legal name is JERI ANN JONES.

In the application for the loan that KEIGLEY submitted to CAPITAL ONE, he listed "JERI A. JONES" as President and Secretary of 1ST PLACE. KEIGLEY listed the address on the application as 6011 E. Hanna Ave., Suite G, Indianapolis, IN 46203, which was the address for 1ST PLACE. In fact, JONES was never an employee of 1ST PLACE, nor did she ever serve as president or secretary of the company.

JONES learned that a loan had been taken out in her name in March 2006, more than one year after KEIGLEY obtained the loan. JONES learned of the loan because she was contacted by a representative of CAPITAL ONE regarding the loan. JONES informed the individual she spoke with at CAPITAL ONE that she never took out a small business loan from CAPITAL ONE, nor did she have any knowledge of a loan having been taken out in her name.

KEIGLEY committed the offense of Identity Deception, Ind. Code 35-43-5-3.5, by submitting a loan application to CAPITAL ONE in JONES' name without her knowledge or consent. Identity Deception is a Class C Felony.

Violations of the Indiana Loan Broker Act

KEIGLEY brokered mortgage loans through 1ST PLACE, an Indiana corporation, in MARION COUNTY, INDIANA, between the dates of October 1, 2005, and March 31, 2007, for at least six (6) persons. The loan broker activities KEIGLEY conducted violated the Indiana Loan Broker Act.

On September 1, 2005, the Indiana Securities Commissioner entered an Order of Summary Revocation against 1ST PLACE MORTGAGE, INC., revoking 1ST PLACE's loan broker license. After 1st PLACE's license was revoked, KEIGLEY continued to broker mortgage loans. KEIGLEY brokered mortgage loans on at least six (6) occasions in MARION COUNTY, INDIANA, without a loan broker license.

Specifically, JASON L. KEIGLEY brokered the following loans:

1. On October 10, 2005, in MARION COUNTY, INDIANA, KEIGLEY brokered a mortgage loan at the offices of 1st PLACE. The loan was for residential property located at 1300 Stratford Drive, Booneville, Indiana 47601, owned by BRINA G. VIDAL ("VIDAL"). VIDAL

applied for a mortgage loan through. KEIGLEY for the purpose of refinancing. The loan was in the amount of SIXTY-EIGHT THOUSAND DOLLARS (\$68,000.00).

2. Between the dates of March 1, 2006, and March 31, 2006, in MARION COUNTY, INDIANA, KEIGLEY brokered a mortgage loan at the offices of FIRST PLACE. The loan was for a residential property located at 1875 Farm Meadow Drive, Greenwood, Indiana 46143, to be purchased by GEORGE W. PAYNE, III ("PAYNE"). PAYNE applied for two (2) mortgage loans through. KEIGLEY for the purpose of buying residential property. These two (2) mortgages, totaled the amount of NINETY-SEVEN THOUSAND NINE HUNDRED FIFTY-FOUR DOLLARS and NINETY CENTS (\$97,954.90).

3. On or about July 18, 2006, in MARION COUNTY, INDIANA, KEIGLEY, representing himself to be a loan originator for C.N.A. MORTGAGE, brokered a mortgage loan in MARION COUNTY, INDIANA for residential property located at 3646 Morningside Drive, Greenwood, Indiana 46143, to be purchased by GARY HIPPENSTEEL ("HIPPENSTEEL"). HIPPENSTEEL applied for a mortgage loan through KEIGLEY for the purpose of buying residential property. The loan was in the amount of TWO HUNDRED SIXTY-TWO THOUSAND DOLLARS (\$262,000.00).

4. On or about October 7, 2005, in MARION COUNTY, INDIANA, KEIGLEY, representing himself to be an originator with COUNTRYWIDE HOME LOANS, brokered a mortgage loan for residential property located in MARION COUNTY, INDIANA at 1422 East Tabor Street, Indianapolis, Indiana 46240, to be purchased by RALPH BAYS ("BAYS"). BAYS applied for a mortgage loan through KEIGLEY for the purpose of buying residential property. The loan was in the amount of FIFTY-TWO THOUSAND FOUR HUNDRED DOLLARS (\$52,400.00).

5. Between the dates of January 1, 2006, and February 28, 2006, in MARION COUNTY, INDIANA, KEIGLEY brokered a mortgage loan at the offices of 1ST PLACE, for residential property located at 909 South Prospect, Terre Haute, Indiana 47802. The property was to be purchased by GEORGE R. WILLIAMS (“WILLIAMS”). WILLIAMS applied for a mortgage loan through KEIGLEY for the purpose of buying residential property. The loan was in the amount of FIFTY THOUSAND FOUR HUNDRED DOLLARS (\$50,400.00).

6. On or about March 6, 2007, in MARION COUNTY, INDIANA, KEIGLEY, representing himself to be an employee of SUNNYMTG.COM 866-768-CASH, LLC (“SUNNYMTG”), offered to broker a mortgage loan in MARION COUNTY, INDIANA for residential property located at 821 East 42nd Street, Indianapolis, Indiana 46205, owned by WANDA PRESTON (“PRESTON”). PRESTON applied for a mortgage loan through KEIGLEY for the purpose of refinancing. The loan was in the amount of ONE HUNDRED FIFTY THOUSAND DOLLARS (\$150,000.00).

Each of the foregoing paragraphs, numbered 1 through 6, constitute the crimes of Unlicensed Loan Broker, class D Felony. Furthermore, because KEIGLEY failed to disclose to the borrowers listed in paragraphs numbered 1 through 6 above that he was not licensed as a loan broker in the State of Indiana, each paragraph constitutes the crime of Loan Broker Fraud, class D felony; .

Credit Card Fraud

KEIGLEY, through 1ST PLACE, obtained property from CAPITAL ONE by using a credit card, with knowledge that the credit card was unlawfully obtained or retained.

KEIGLEY obtained money from CAPITAL ONE through the use of a credit card, account number XXXX-XXXX-XXXX-9017. The card was issued under the name of "CHARLES LAMBERT JR.," ("LAMBERT"), at the address of 1ST PLACE.

The undersigned interviewed LAMBERT on June 28, 2007. LAMBERT explained that he is currently eighty-five (85) years old and that he had been a customer of KEIGLEY and had submitted a mortgage loan application to him. KEIGLEY obtained personal information from LAMBERT from the application. LAMBERT never opened an account with CAPITAL ONE and did not authorize KEIGLEY to open an account in his name with CAPITAL ONE.

Documents obtained from CAPITAL ONE show that TWENTY-THREE THOUSAND THREE HUNDRED SIXTY-NINE DOLLARS and NINETY-THREE CENTS (\$23,369.93) has been charged to this account. In addition, checks from 1ST PLACE that bear KEIGLEY'S signature were submitted to financial institutions for purposes of withdrawals from the account.

This alleged activity by JASON L. KEIGLEY constitutes the offense of Credit Card Fraud, a Class D Felony, Indiana Code 35-43-5-4.

I AFFIRM, UNDER THE PENALTIES FOR PERJURY, THAT THE FOREGOING REPRESENTATIONS ARE TRUE.

Dated: 2-9-2009 Affiant Charles P. Williams

Charles P. Williams, Investigator
Indiana Secretary of State
Securities Division
Prosecution Assistance Unit