

**IN THE CIRCUIT COURT OF THE ELEVENTH JUDICIAL CIRCUIT  
IN AND FOR MIAMI-DADE COUNTY, FLORIDA**

STATE OF FLORIDA,  
Plaintiff,

Court Case No. \_\_\_\_\_  
Division: \_\_\_\_\_

vs.

(OSWP Case No. 2005-0118-MDB)

(A) TERRENCE E. ROSENBERG,  
(B) JAMES W. CHANCELOR,  
(C) SHANNELLE SARAH BRANTLEY, &  
(D) LEIGHTON KIMANI BROWN,  
Defendants.

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**INFORMATION FOR:**

COUNT 1:  
GRAND THEFT SECOND DEGREE,  
\$20,000 OR MORE  
F.S. 812.014(2)(b)1.  
(F-2) (L-6)  
Def. A, B & C

COUNT 4:  
MORTGAGE TRANSACTION/  
FALSE STATEMENT  
F.S. 494.0025(5)  
(F-3) (L-1)  
Def. C

COUNT 2:  
ORGANIZED FRAUD,  
\$20,000 OR MORE  
F.S. 817.034(4)(a)2.  
(F-2) (L-5)  
Def. A & B

COUNT 5:  
ACCESSORY AFTER THE FACT  
F.S. 777.03  
(F-3) (L-4)  
Def. D

COUNT 3:  
REAL ESTATE BROKER/  
ACT AS WITHOUT A LICENSE  
F.S. 475.42(1)(A)  
(F-3) (L-1)  
Def. B

IN THE NAME OF AND BY THE AUTHORITY OF THE STATE OF FLORIDA

**COUNT 1:**

PETER H. WILLIAMS, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, CHARGES that beginning on or about June 1, 2003, and continuing through on or about April 13, 2004, in the Eleventh and Seventeenth Judicial Circuits of Florida, to-wit: Miami-Dade and Broward Counties, Florida, defendants **TERRENCE E. ROSENBERG, JAMES W. CHANCELOR,** and **SHANNELLE SARAH BRANTLEY** did knowingly, unlawfully and feloniously obtain or use or did endeavor to obtain or use United States currency, valued at twenty thousand dollars (\$20,000.00) or more but less than one hundred thousand dollars (\$100,000.00), the property of Gloria Baker, and/or the Clerk of the Court of the Eleventh Judicial Circuit in and for Miami-Dade County, as owner or custodian, with the intent to temporarily or permanently deprive Gloria Baker, and/or the Clerk of the Court of the Eleventh Judicial Circuit in and for Miami-Dade County, of a right to the property or of a benefit there from or to appropriate the property to said defendant's own use or to the use of a person not entitled thereto, in violation of 812.014(1), 812.014(2)(b)1, and 777.011, Florida Statutes.

**COUNT 2:**

PETER H. WILLIAMS, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, CHARGES that beginning on or about June 1, 2003, and continuing through on or about April 13, 2004, in the Eleventh and Seventeenth Judicial Circuits of Florida, to-wit: Miami-Dade and Broward Counties, Florida, defendants **TERRENCE E. ROSENBERG** and **JAMES W. CHANCELOR** did unlawfully and feloniously engage in a scheme to defraud as defined by s.817.034(3)(d), Florida Statutes, by engaging in a systematic, ongoing course of conduct with intent to defraud one or more persons and/or obtain property from one or more persons, to wit: Debbie Johnson, Gloria Baker, the Clerk of the Court of the Eleventh Judicial Circuit in and for Miami-Dade County, and/or the Circuit Court of the Eleventh Judicial Circuit in and for Miami-Dade County, by false or fraudulent pretenses, representations, or promises or willful misrepresentations of a future act, and did thereby obtain property, to wit: United States currency, of an aggregate value of twenty thousand dollars (\$20,000.00) or more but less than fifty thousand dollars (\$50,000), the property of Gloria Baker, and/or the Clerk of the Court of the Eleventh Judicial Circuit in and for Miami-Dade County, as owner or custodian, in violation of 817.034(4)(a)2. and 777.011, Florida Statutes.

**COUNT 3:**

PETER H. WILLIAMS, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, CHARGES that beginning on or about April 13, 2004, and continuing through on or about April 13, 2004, in the Eleventh and Seventeenth Judicial Circuits of Florida, to-wit: Miami-Dade and Broward Counties, Florida, defendant **JAMES W. CHANCELOR** did unlawfully operate as a real estate broker or sales associate without a current, active license issued by the Department of Business and Professional

Regulations, in violation of 475.42(1)(a), Florida Statutes.

**COUNT 4:**

PETER H. WILLIAMS, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, CHARGES that beginning on or about February 11, 2004, and continuing through on or about April 13, 2004, in the Eleventh and Seventeenth Judicial Circuits of Florida, to-wit: Miami-Dade and Broward Counties, Florida, defendant **SHANNELLE SARAH BRANTLEY** did, in a matter within the jurisdiction of the Office of Financial Regulation of the Financial Services Commission, knowingly and make a false or fraudulent statement or representation, to wit: she had been employed by Ruedaed, Inc. as a manager for 2 years, with a monthly income of \$4,851.69, and/or she had been renting a residence at 3200 N.W. 205 St., Miami, FL, for 3 years, and/or she had \$30,000 cash being held toward the purchase of the house to be purchased by Sarino Costanzo, the closing agent for this sale, and/or she intended to occupy the house to be purchased, in violation of 494.0025(5), Florida Statutes.

**COUNT 5:**

PETER H. WILLIAMS, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, CHARGES that beginning on or about August 1, 2005, and continuing through on or about August 31, 2005, in the Eleventh and Seventeenth Judicial Circuits of Florida, to-wit: Miami-Dade and Broward Counties, Florida, defendant **LEIGHTON KIMANI BROWN**, not standing in the relation of husband or wife, parent or grandparent, brother or sister, by consanguinity or affinity to SHANNELLE SARAH BRANTLEY, did unlawfully and feloniously maintain, assist or give other aid to SHANNELLE SARAH BRANTLEY, knowing that SHANNELLE SARAH BRANTLEY had committed a felony, to wit: Grand Theft Second Degree, \$20,000 or More, with intent that SHANNELLE SARAH BRANTLEY shall avoid or escape detection, arrest, trial or punishment, in violation of 777.03, Florida Statutes.

AND SAID OFFENSES OCCURRED IN TWO OR MORE JUDICIAL CIRCUITS IN THE STATE OF FLORIDA AS PART OF A RELATED TRANSACTION OR SAID OFFENSES WERE CONNECTED WITH AN ORGANIZED CRIMINAL CONSPIRACY AFFECTING TWO OR MORE JUDICIAL CIRCUITS IN THE STATE OF FLORIDA.

PETER H. WILLIAMS  
STATEWIDE PROSECUTOR  
STATE OF FLORIDA

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JULIE ANN STONE  
Designated Assistant Statewide Prosecutor  
Florida Bar No. 354200  
Office of Statewide Prosecution  
444 Brickell Avenue, Suite 650  
Miami, Florida 33131  
(305) 377-5850 x201

STATE OF FLORIDA  
COUNTY OF MIAMI-DADE

Personally appeared before me, Julie Ann Stone, Designated Assistant Statewide Prosecutor for the State of Florida, who, being first duly sworn, says that she has received testimony under oath from the material witnesses which, if true, would constitute the offenses herein charged, and that this prosecution is instituted in good faith.

Sworn to and subscribed before me this \_\_\_\_\_ day of January, 2006, by Julie Ann Stone, who is personally known to me.

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Notary Public  
State of Florida at Large

DEFENDANT BIOGRAPHICAL DATA

(A) TERRENCE E. ROSENBERG  
A/K/A TERRY ROSENBERG  
W/M, DOB 11/09/44  
LKA 79 N. HIBISCUS DRIVE, MIAMI BEACH, FL

(B) JAMES W. CHANCELOR  
A/K/A COREY J. WALDEN  
B/M, DOB 09/24/49  
LKA 392 SW 187 TERRACE, PEMBROKE PINES, FL 33029

(C) SHANNELLE SARAH BRANTLEY  
B/F, DOB 07/05/79  
LKA 12601 NW 27 AVENUE, APT. 103, MIAMI, FL

(D) LEIGHTON KIMANI BROWN  
B/M, DOB 05/22/80  
LKA 701 BRICKELL KEY BLVD., APT. 2312, MIAMI, FL