## IN THE CIRCUIT COURT OF THE NINTH JUDICIAL CIRCUIT IN AND FOR ORANGE COUNTY, FLORIDA

# FALL TERM 2022

### THE STATE OF FLORIDA

234. CF. 4145.40

**DIVISION** -

- 1. EXPLOITATION OF ELDERLY PERSON **OR DISABLED PERSON >\$50,000 (Breach** Power of Attorney) (F1-L8)
- 2. EXPLOITATION OF ELDERLY OR **DISABLED PERSON >= \$50,000 (Position of** Trust and Confidence) (F1-L8)
- 3. EXPLOITATION OF ELDERLY OR **DISABLED PERSON >=\$50,000 (Intentionally** or Negligently Misuse) (F1-L8)
- 4. SCHEME TO DEFRAUD OF \$50,000 OR MORE (F1-L7)
- 5. FRAUDULENT USE OF PERSONAL **IDENTIFICATION, OVER \$100,000 (10 Year** Minimum Mandatory) (F1-L7)
- 6. FRAUDULENT USE OF PERSONAL **IDENTIFICATION -**Parent/Guardian/Custodian (F2-L9)
- 7. MORTGAGE FRAUD (Greater than \$100,000) (F2-L4)

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

The Grand Jurors of the County of Orange, duly called, impaneled and sworn to inquire and true presentment make in and for the body of the County of Orange, upon their oaths do present that REGINA IRENE HILL, between on or about the 29th day of April, 2021, and on or about the 13th day of March, 2024, in Orange County, Florida and Seminole County, Florida, did, in violation of Florida Statutes 825.103(1)(c) and 825.103(3)(a), while having a fiduciary duty to ANNIE MAE CURTIS, an Page 1 of 6 His 27 DAY OF MARCH 2

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1	1 E.K.M 2023		
	INDICTMENT CASE NUMBER #	2054.	NF.

VS.

# **REGINA IRENE HILL**

elderly or disabled person, as her agent under a power of attorney, violate said fiduciary duty by abusing her power, or wasting, embezzling or intentionally mismanaging the assets of the principal or beneficiary, or acting contrary to the principal's sole benefit or best interest; or violate the aforesaid fiduciary duty by actions which result in an unauthorized appropriation, sale, transfer of property, or receipt of an improper benefit in which ANNIE MAE CURTIS did not receive the reasonably equivalent financial value in goods or services; and the funds, assets, or property involved in the exploitation of ANNIE MAE CURTIS is valued at \$50,000 or more.

## COUNT TWO

And the Grand Jurors of the County of Orange, duly called, impaneled and sworn to inquire and true presentment make in and for the body of the County of Orange, upon their oaths do present that REGINA IRENE HILL, between on or about the 29th day of April, 2021, and on or about the 13th day of March, 2024, in Orange County, Florida and Seminole County, Florida, did, in violation of Florida Statutes 825.103(1)(a) and 825.103(3)(a), while standing in a position of trust and confidence with ANNIE MAE CURTIS, an elderly person or disabled adult, knowingly obtain or use, or endeavor to obtain or use, ANNIE MAE CURTIS'S funds, assets, or property, valued at \$50,000 or more, with the intent to temporarily or permanently deprive ANNIE MAE CURTIS of the use, benefit, or possession of the funds, assets, or property, or to benefit someone other than ANNIE MAE CURTIS.

#### COUNT THREE

And the Grand Jurors of the County of Orange, duly called, impaneled and sworn to inquire and true presentment make in and for the body of the County of Orange, upon their oaths do present that REGINA IRENE HILL, between on or about the 29th day of April, 2021, and on or about the 13th day of March, 2024, in Orange County, Florida and Seminole County, Florida, did, in violation of Florida Statutes 825.103(1)(e) and 825.103(3)(a), while being a caregiver to or standing in a position of trust and confidence with ANNIE MAE CURTIS, an elderly person or disabled adult, intentionally or negligently fail to effectively use, ANNIE MAE CURTIS'S income and assets, valued at \$50,000 or more, for the necessities required for ANNIE MAE CURTIS'S support and maintenance.

#### COUNT FOUR

And the Grand Jurors of the County of Orange, duly called, impaneled and sworn to inquire and true presentment make in and for the body of the County of Orange, upon their oaths do present that REGINA IRENE HILL, between on or about the 1st day of April, 2021, and on or about the 13th day of March, 2024, in Orange County, Florida and Seminole County, Florida, did, in violation of Florida Statutes 817.034(4)(a)(1), engage in a systematic, ongoing course of conduct with intent to defraud one or more persons, to-wit: ANNIE MAE CURTIS, or to obtain property from said one or more persons by false or fraudulent pretenses, representations, or promises, or willful misrepresentations of a future act, and who so obtained property, to-wit: United States money current, which has an aggregate value of \$50,000 or more, from one or more of said persons, to-wit: ANNIE MAE CURTIS.

#### COUNT FIVE

And the Grand Jurors of the County of Orange, duly called, impaneled and sworn to inquire and true presentment make in and for the body of the County of Orange, upon their oaths do present that REGINA IRENE HILL, on or about the 19th day of August, 2022, in Orange County, Florida and Seminole County, Florida, did, in violation of Florida Statutes 817.568(2)(c) and 817.568(6), willfully and without authorization fraudulently use, or possess with intent to fraudulently use, personal identification information concerning ANNIE MAE CURTIS, a person 60 years of age or older, without first obtaining the consent of ANNIE MAE CURTIS, and the pecuniary benefit, the value of the services received, the payment sought to be avoided or the amount of the injury or fraud perpetrated was \$100,000 or more.

## COUNT SIX

And the Grand Jurors of the County of Orange, duly called, impaneled and sworn to inquire and true presentment make in and for the body of the County of Orange, upon their oaths do present that REGINA IRENE HILL, on or about the 19th day of August, 2022, in Orange County, Florida and Seminole County, Florida, did, in violation of Florida Statutes 817.568(7), willfully and fraudulently use the personal identification information of ANNIE MAE CURTIS while exercising custodial authority over ANNIE MAE CURTIS, a person 60 years of age or older.

#### COUNT SEVEN

And the Grand Jurors of the County of Orange, duly called, impaneled and sworn to inquire and true presentment make in and for the body of the County of Orange, upon their oaths do present that REGINA IRENE HILL, between on or about the 19th day of August, 2022, and on or about the 23rd day of August, 2022, in Orange County, Florida and Seminole County, Florida, did, in violation of Florida Statutes 817.545, with intent to defraud knowingly: make any material misstatement, misrepresentation, or omission during the mortgage lending process with the intention that the misstatement, misrepresentation, or omission will be relied on by HOMEBRIDGE FINANCIAL SERVICES, INC. d/b/a REAL ESTATE MORTGAGE NETWORK, a mortgage lender, borrower, or any other person or entity involved in the mortgage lending process or uses or facilitates the use of any material misstatement, misrepresentation, or omission during the mortgage lending process with the intention that the material misstatement, misrepresentation, or omission will be relied on by HOMEBRIDGE FINANCIAL SERVICES, INC. d/b/a REAL ESTATE MORTGAGE NETWORK, a mortgage lender, borrower, or any other person or entity involved in the mortgage lending process and none of the omissions on the loan application regarded employment, income or assets for a loan which does not require this information; or REGINA IRENE HILL received proceeds or any other funds in connection with the mortgage lending process that she, REGINA IRENE HILL, knew resulted from a violation of Florida Statutes 817.545 (a) or (b) or filed or caused to be filed with the Orange County Comptroller, acting as clerk of the circuit court of Orange County, Florida for the recording of a document involved in the mortgage lending process, which contains a material misstatement, misrepresentation, or omission and the value of the loan stated on the documents used in the mortgage lending process exceeds \$100,000.

A TRUE BILL

Foreperson of the Grand Jury

As authorized and required by law, I have advised the Grand Jury returning this indictment.

Robert C. Finkbeiner, Designated Assistant State Attorney

Filed and presented in Open Court, in the presence of the Grand Jury this 2 day of March, 2024.

Tiffany Moore Russell Clerk of the Circuit Court

By: sma Deputy Clerk