

No. 25 03519

STATE OF TENNESSEE

V.

DEANDRE BROWN AND VINESSA BROWN

Indictment for

THEFT OF PROPERTY OVER \$250,000.00 ✓
COMPUTER FRAUD OVER \$60,000.00
~~THEFT OF PROPERTY OVER \$60,000.00~~
~~COMPUTER FRAUD OVER \$60,000.00~~
THEFT OF PROPERTY OVER \$250,000.00 ✓
THEFT OF PROPERTY OVER \$60,000.00
COMPUTER FRAUD OVER \$10,000.00
THEFT OF PROPERTY OVER \$250,000.00 ✓
COMPUTER FRAUD OVER \$10,000.00
MONEY LAUNDERING
MONEY LAUNDERING
OFFICIAL MISCONDUCT

T.C.A. 39-14-103
T.C.A. 39-14-602
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T.C.A. 39-14-103
T.C.A. 39-14-602
T.C.A. 39-14-103
T.C.A. 39-14-602
T.C.A. 39-14-903
T.C.A. 39-14-903
T.C.A. 39-16-402

SCATS CODE - 30164
SCATS CODE - N/A
SCATS CODE - 27019
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SCATS CODE - 27019
SCATS CODE - 30702
SCATS CODE - 30164
SCATS CODE - 30702
SCATS CODE - 22901
SCATS CODE - 22901
SCATS CODE - 21132

STATE OF TENNESSEE) CRIMINAL COURT OF SHELBY COUNTY

)

SHELBY COUNTY) JULY TERM, 2025

Count 1

THE GRAND JURORS of the State of Tennessee, duly selected, empaneled, sworn and charged to inquire for the body of the county of Shelby, Tennessee, upon their oath, present that:

DEANDRE BROWN AND VINESSA BROWN

between January 1, 2020 and December 31, 2020 in Shelby County, Tennessee, and before the finding of this indictment, pursuant to and arising from a common scheme, purpose, intent or enterprise, did unlawfully and knowingly obtain or exercise control over certain property, to wit: a sum of money, of the value of \$250,000 or more, the property of Lifeline to Success or the City of Memphis or the Carter Funding Corporation or the Community Foundation of Greater Memphis or the Shelby County Government or the Memphis Zoological Society or Benjamin Keras or TapGive.org or AT&T or the American Endowment Foundation or PayPal Giving Fund or Slingshot Memphis or the Orion Federal Credit Union or Girls Inc of Memphis or Dream.org or the First Baptist Church of Memphis or Farris Bobango Branan PLC, without the effective consent of Lifeline to Success or the above named entities or individuals, with intent to deprive Lifeline to Success or the above named entities or individuals of the said property, in violation of T.C.A. § 39-14-103 and T.C.A. § 39-14-105, against the peace and dignity of the State of Tennessee.

Count 2

THE GRAND JURORS of the State of Tennessee, duly selected, empaneled, sworn and charged to inquire for the body of the county of Shelby, Tennessee, upon their oath, present that:

DEANDRE BROWN AND VINESSA BROWN

between January 1, 2020 and December 31, 2020 in Shelby County, Tennessee, and before the finding of this indictment, pursuant to and arising from a common scheme, purpose, intent or enterprise, did unlawfully and knowingly, directly or indirectly access, cause to be accessed, or attempt to access any telephone system, telecommunications facility, computer software, computer program, data, computer, computer system, computer network, or any part thereof for the purpose of obtaining money, property, or services with a value of \$60,000 or more but less than \$250,000 for the said DEANDRE BROWN AND VINESSA BROWN or another by means of false or fraudulent pretenses, representations or promises, the said act being committed in connection with the ongoing acts of Theft of Property, in violation of T.C.A. § 39-14-602 and T.C.A. § 39-14-105, against the peace and dignity of the State of Tennessee.

Count 3

THE GRAND JURORS of the State of Tennessee, duly selected, empaneled, sworn and charged to inquire for the body of the county of Shelby, Tennessee, upon their oath, present that:

DEANDRE BROWN AND VINESSA BROWN

Between January 1, 2021 and December 31, 2021 in Shelby County, Tennessee, and before the finding of this indictment, pursuant to and arising from a common scheme, purpose, intent or enterprise, did unlawfully and knowingly obtain or exercise control over certain property, to wit a sum of money, of the value of \$60,000 or more but less than \$250,000, the property of Lifeline to Success or Carter Funding Corporation or the City of Memphis or Youth Villages or AgriCenter International Memphis or TapGive.org or Rotolo Consultants or Everytown for Gun Safety or the Shelby County Government or Legal Action Center or ResiAmerica Memphis or The Works Inc Memphis or Girls Inc of Memphis or Dorothy Sullivan or Network for Good or the First Baptist Church or the Memphis Zoological Society or Charles Schwab Charitable or SunTrust Bank, without the effective consent of Lifeline to Success or the above named entities or individuals, with intent to deprive Lifeline to Success or the above named entities or individuals of the said property, in violation of T.C.A. § 39-14-103 and T.C.A. § 39-14-105, against the peace and dignity of the State of Tennessee.

Count 4

THE GRAND JURORS of the State of Tennessee, duly selected, empaneled, sworn and charged to inquire for the body of the county of Shelby, Tennessee, upon their oath, present that:

DEANDRE BROWN AND VINESSA BROWN

between January 1, 2021 and December 31, 2021 in Shelby County, Tennessee, and before the finding of this indictment, pursuant to and arising from a common scheme, purpose, intent or enterprise, did unlawfully and knowingly, directly or indirectly access, cause to be accessed, or attempt to access any telephone system, telecommunications facility, computer software, computer program, data, computer, computer system, computer network, or any part thereof for the purpose of obtaining money, property, or services with a value of \$60,000 or more but less than \$250,000 for the said DEANDRE BROWN AND VINESSA BROWN or another by means of false or fraudulent pretenses, representations or promises, the said act being committed in connection with the ongoing acts of Theft of Property, in violation of T.C.A § 39-14-602 and T.C.A. § 39-14-105, against the peace and dignity of the State of Tennessee.

Count 5

THE GRAND JURORS of the State of Tennessee, duly selected, empaneled, sworn and charged to inquire for the body of the county of Shelby, Tennessee, upon their oath, present that:

DEANDRE BROWN AND VINESSA BROWN

Between January 1, 2022 and December 31, 2022 in Shelby County, Tennessee, and before the finding of this indictment, pursuant to and arising from a common scheme, purpose, intent or enterprise, did unlawfully and knowingly obtain or exercise control over certain property, to wit a sum of money, of the value of \$250,000 or more, the property of Lifeline to Success or Youth Villages or the State of Tennessee or the Fleetwood Foundation or Rotolo Consultants or the City of Memphis or the Carter Funding Corporation or FedEx or Agape Child & Family Services or the First Baptist Church of Memphis or TapGive.org or CFDI or the Legal Action Center or Frank and April Davidson or Network for Good or MoneyGram or Charles Schwab Charitable or Legacy of Legends or Wyeth or Melody Jean Greene, without the effective consent of Lifeline to Success or the above named entities or individuals, with intent to deprive Lifeline to Success or the above named entities or individuals of the said property, in violation of T.C.A. § 39-14-103 and T.C.A. § 39-14-105, against the peace and dignity of the State of Tennessee.

Count 6

THE GRAND JURORS of the State of Tennessee, duly selected, empaneled, sworn and charged to inquire for the body of the county of Shelby, Tennessee, upon their oath, present that:

DEANDRE BROWN AND VINESSA BROWN

Between January 1, 2023 and December 31, 2023 in Shelby County, Tennessee, and before the finding of this indictment, pursuant to and arising from a common scheme, purpose, intent or enterprise, did unlawfully and knowingly obtain or exercise control over certain property, to wit a sum of money, of the value of \$60,000 or more but less than \$250,000, the property of Lifeline to Success or Youth Villages or the U.S. Department of Justice or Rotolo Consultants or Benjamin Keras or Fleetwood Foundation or the Community Foundation of Greater Memphis or Christian Community Foundation of Memphis or Fidelity Bank Services or Point of Impact Global Missions or Frank and April Davidson or First Baptist Church of Memphis or Southern Security Federal or Kimberly Clark Credit Union or Girls Inc of Memphis or Legal Action Center or Wolf River Conservancy or Charles Schwab Charitable or Jazmyn Baker or Libertas School or Dawn Kinard, without the effective consent of Lifeline to Success or the above named entities or individuals, with intent to deprive Lifeline to Success or the above named entities or individuals of the said property, in violation of T.C.A. § 39-14-103 and T.C.A. § 39-14-105, against the peace and dignity of the State of Tennessee.

Count 7

THE GRAND JURORS of the State of Tennessee, duly selected, empaneled, sworn and charged to inquire for the body of the county of Shelby, Tennessee, upon their oath, present that:

DEANDRE BROWN AND VINESSA BROWN

between January 1, 2023 and December 31, 2023 in Shelby County, Tennessee, and before the finding of this indictment, pursuant to and arising from a common scheme, purpose, intent or enterprise, did unlawfully and knowingly, directly or indirectly access, cause to be accessed, or attempt to access any telephone system, telecommunications facility, computer software, computer program, data, computer, computer system, computer network, or any part thereof for the purpose of obtaining money, property, or services with a value of \$10,000 or more but less than \$60,000 for the said DEANDRE BROWN AND VINESSA BROWN or another by means of false or fraudulent pretenses, representations or promises, the said act being committed in connection with the ongoing acts of Theft of Property, in violation of T.C.A. § 39-14-602 and T.C.A. § 39-14-105, against the peace and dignity of the State of Tennessee.

Count 8

THE GRAND JURORS of the State of Tennessee, duly selected, empaneled, sworn and charged to inquire for the body of the county of Shelby, Tennessee, upon their oath, present that:

DEANDRE BROWN AND VINESSA BROWN

between January 1, 2024 and August 31, 2024 in Shelby County, Tennessee, and before the finding of this indictment, pursuant to and arising from a common scheme, purpose, intent or enterprise, did unlawfully and knowingly obtain or exercise control over certain property, to wit: a sum of money, of the value of \$250,000 or more, the property of Lifeline to Success or the U.S. Department of Justice or Youth Villages or Shelby County Government or the City of Memphis or the First Baptist Church of Memphis or Rotolo Consultants or Frayser Community Development Corporation or American University, without the effective consent of the Lifeline to Success or the above named entities or individuals, with intent to deprive Lifeline to Success or the above named entities or individuals of the said property, in violation of T.C.A. § 39-14-103 and T.C.A. § 39-14-105, against the peace and dignity of the State of Tennessee.

Count 9

THE GRAND JURORS of the State of Tennessee, duly selected, empaneled, sworn and charged to inquire for the body of the county of Shelby, Tennessee, upon their oath, present that:

DEANDRE BROWN AND VINESSA BROWN

between January 1, 2024 and August 31, 2024 in Shelby County, Tennessee, and before the finding of this indictment, pursuant to and arising from a common scheme, purpose, intent or enterprise, did unlawfully and knowingly, directly or indirectly access, cause to be accessed, or attempt to access any telephone system, telecommunications facility, computer software, computer program, data, computer, computer system, computer network, or any part thereof for the purpose of obtaining money, property, or services with a value of \$10,000 or more but less than \$60,000 for the said DEANDRE BROWN AND VINESSA BROWN or another by means of false or fraudulent pretenses, representations or promises, the said act being committed in connection with the ongoing acts of Theft of Property, in violation of T.C.A. § 39-14-602 and T.C.A. § 39-14-105, against the peace and dignity of the State of Tennessee.

Count 10

THE GRAND JURORS of the State of Tennessee, duly selected, empaneled, sworn and charged to inquire for the body of the county of Shelby, Tennessee, upon their oath, present that:

DEANDRE BROWN AND VINESSA BROWN

between January 1, 2020 and August 31, 2024, did unlawfully and knowingly use, conspire to use or attempt to use proceeds derived directly or indirectly from a specified unlawful activity, to wit: Theft of Property, to conduct or attempt to conduct a financial transaction, or make any other disposition with the intent to conceal or disguise the nature, location, source, ownership or control of the said criminally derived proceeds, in violation of T.C.A. § 39-14-903(a) and T.C.A. § 39-11-402(2), against the peace and dignity of the State of Tennessee.

Count 11

THE GRAND JURORS of the State of Tennessee, duly selected, empaneled, sworn and charged to inquire for the body of the county of Shelby, Tennessee, upon their oath, present that:

DEANDRE BROWN AND VINESSA BROWN

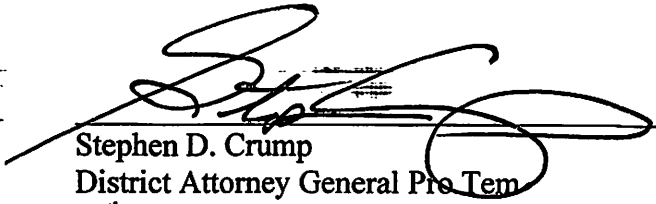
between January 1, 2020 and August 31, 2024, did unlawfully and knowingly use proceeds derived directly or indirectly from a specified unlawful activity, to wit: Theft of Property, with the intent to promote, in whole or in part, the carrying on of said criminal activity, in violation of T.C.A. § 39-14-903(b) and T.C.A. § 39-11-402(2), against the peace and dignity of the State of Tennessee.

Count 12

THE GRAND JURORS of the State of Tennessee, duly selected, empaneled, sworn and charged to inquire for the body of the county of Shelby, Tennessee, upon their oath, present that:

DEANDRE BROWN AND VINESSA BROWN

between January 1, 2022 and August 31, 2024, while acting as a public servant and with intent to obtain a benefit or to harm another, did unlawfully and intentionally or knowingly receive a benefit not otherwise authorized by law, to wit: grant funding from the Shelby County Government, in violation of T.C.A. § 39-16-402(a)(5) and T.C.A. § 39-11-402(2), against the peace and dignity of the State of Tennessee.



Stephen D. Crump
District Attorney General Pro Tem
30th Judicial District

Witnesses:

Summon for the State

Tennessee Comptroller

Prosecutor

Foreperson of the Grand Jury

A True Bill

Date Indictment Returned:

8-26-25