

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA : **CRIMINAL NO.** _____
v. : **DATE FILED:** _____
CHRISTOPHER BRITT : **VIOLATIONS:**
: **18 U.S.C. § 1344 (bank fraud - 1 count)**
: **18 U.S.C. § 1028A (aggravated identity**
: **theft - 6 counts)**
: **18 U.S.C. § 2 (aiding and abetting)**
: **Notice of forfeiture**

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

At all times material to this information:

1. PNC Bank was a financial institution, the deposits of which were insured by the Federal Deposit Insurance Corporation (“FDIC”), certificate number 6384.

2. From on or about October 2, 2007 through on or about October 19, 2007, in the Eastern District of Pennsylvania, and elsewhere, defendant

CHRISTOPHER BRITT

knowingly executed, and aided and abetted the execution of, a scheme to defraud PNC Bank, and to obtain monies owned by and under the care, custody, and control of PNC Bank by means of false and fraudulent pretenses, representations, and promises.

THE SCHEME

3. Defendant CHRISTOPHER BRITT obtained stolen account information of victim PNC Bank customers who had high balances in their accounts.

4. Defendant CHRISTOPHER BRITT obtained false identification documents in the name of the victim PNC Bank customers.

5. Defendant CHRISTOPHER BRITT filled out fraudulent withdrawal slips in the names of the victim PNC Bank customers and appeared at various PNC Bank branches in the Eastern District of Pennsylvania.

6. Defendant CHRISTOPHER BRITT presented the false identification documents and the fraudulent withdrawal slips to PNC Bank tellers to make unauthorized withdrawals from accounts of the victim PNC Bank customers.

7. In furtherance of the scheme, defendant CHRISTOPHER BRITT fraudulently withdrew funds from the following accounts on the following dates:

DATE	PNC BANK LOCATION	VICTIM ACCOUNT HOLDER	WITHDRAWAL/ CHECK AMOUNT
10/2/2007	7508 Haverford Avenue Philadelphia, PA	J.G.J.	\$3,500
10/3/2007	2924 West Chester Pike Broomall, PA	J.G.J.	\$4,000
10/4/2007	1170 W. Baltimore Pike Media, PA	J.G.J.	\$3,000
10/17/2007	109 E. Dekalb Pike King of Prussia, PA	W.D.	\$4,000
10/18/2007	5050 State Road Drexel Hill, PA	W.D.	\$4,000
10/19/2007	5050 State Road Drexel Hill, PA	W.D.	\$4,100

All in violation of Title 18, United States Code, Sections 1344 and 2.

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 2, 2007, in the Eastern District of Pennsylvania and elsewhere, defendant

CHRISTOPHER BRITT

knowingly and without lawful authority possessed and used, and aided and abetted the use of, a means of identification of another person, that is, the name of J.G.J., during and in relation to bank fraud.

In violation of Title 18, United States Code, Sections 1028A(a)(1), (c)(5) and 2.

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 3, 2007, in the Eastern District of Pennsylvania and elsewhere, defendant

CHRISTOPHER BRITT

knowingly and without lawful authority possessed and used, and aided and abetted the use of, a means of identification of another person, that is, the name of J.G.J., during and in relation to bank fraud.

In violation of Title 18, United States Code, Sections 1028A(a)(1), (c)(5) and 2.

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 4, 2007, in the Eastern District of Pennsylvania and elsewhere, defendant

CHRISTOPHER BRITT

knowingly and without lawful authority possessed and used, and aided and abetted the use of, a means of identification of another person, that is, the name of J.G.J., during and in relation to bank fraud.

In violation of Title 18, United States Code, Sections 1028A(a)(1), (c)(5) and 2.

COUNT FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 17, 2007, in the Eastern District of Pennsylvania and elsewhere, defendant

CHRISTOPHER BRITT

knowingly and without lawful authority possessed and used, and aided and abetted the use of, a means of identification of another person, that is, the name of W.D., during and in relation to bank fraud.

In violation of Title 18, United States Code, Sections 1028A(a)(1), (c)(5) and 2.

COUNT SIX

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 18, 2007, in the Eastern District of Pennsylvania and elsewhere, defendant

CHRISTOPHER BRITT

knowingly and without lawful authority possessed and used, and aided and abetted the use of, a means of identification of another person, that is, the name of W.D., during and in relation to bank fraud.

In violation of Title 18, United States Code, Sections 1028A(a)(1), (c)(5) and 2.

COUNT SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 19, 2007, in the Eastern District of Pennsylvania and elsewhere, defendant

CHRISTOPHER BRITT

knowingly and without lawful authority possessed and used, and aided and abetted the use of, a means of identification of another person, that is, the name of W.D., during and in relation to bank fraud.

In violation of Title 18, United States Code, Sections 1028A(a)(1), (c)(5) and 2.

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

1. As a result of the violations of Title 18, United States Code, Section 1344, set forth in this information, defendant

CHRISTOPHER BRITT

shall forfeit to the United States of America any property that constitutes or is derived from gross proceeds traceable to the commission of such offenses, including, but not limited to, the sum of \$22,600.

2. If any of the property subject to forfeiture, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 18, United States Code, Section 982(b) and Title 28, United States Code, Section 2461(c), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property subject to forfeiture.

All pursuant to Title 18, United States Code, Section 982(a)(2)(A).

A TRUE BILL:

FOREPERSON

MICHAEL L. LEVY
UNITED STATES ATTORNEY