

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA)
)
 v.) No. 12 CR 904
)
) Violation: Title 18, United States Code,
) Sections 473, 1028A, and 1344
 KENNETH PEARSON aka "Black,")
 DAVID KOTLICKY,)
 ERIC JACKSON,)
 STACEY SANDERS,)
 LATRESE LESHORE,)
 ROGER ELAM,)
 ROSIE ELAM,)
 ANTIONE MAHONE,)
 LYNADA MAHONE,)
 TOVISE STONE,)
 STARLINDA STUBBS, and)
 DEANGRIA WELLS)

COUNT ONE

The SPECIAL JANUARY 2012 GRAND JURY charges:

1. At times material to this indictment, American Chartered Bank, Chase Bank, Citibank, Fifth Third Bank, First Midwest Bank, Harris Bank, and U.S. Bank were financial institutions whose deposits were insured by the Federal Deposit Insurance Corporation.

2. Beginning no later than in or about August 2010 and continuing through at least in or about December 2012, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

KENNETH PEARSON aka “Black,”
DAVID KOTLICKY,
ERIC JACKSON,
STACEY SANDERS,
LATRESE LESHORE,
ROGER ELAM,
ROSIE ELAM,
ANTIONE MAHONE,
LYNADA MAHONE,
TOVISE STONE,
STARLINDA STUBBS, and
DEANGRIA WELLS,

defendants herein, and others, knowingly participated in a scheme to defraud a financial institution and to obtain money and funds owned by and under the custody and control of the financial institution by means of materially false and fraudulent pretenses, representations, and promises, which scheme is further described in the following paragraphs.

3. It was part of the scheme that defendants and their co-schemers caused to be created hundreds of counterfeit checks, with face values totaling over \$1 million, presented them to financial institutions including American Chartered Bank, Chase Bank, Citibank, Harris Bank, Fifth Third Bank, First Midwest Bank, and US Bank to be cashed, and kept and shared the proceeds of the fraudulently created and cashed checks.

4. It was further part of the scheme that defendant LATRESE LESHORE stole bank customers' authentic checks and account information. Defendant LESHORE took the checks and account information from her workplace, copied them, and provided them to another co-schemer in exchange for cash, knowing that victims' accounts would be compromised.

5. It was further part of the scheme that defendants KENNETH PEARSON, DAVID KOTLICKY, and ERIC JACKSON used the bank customers' stolen checks and account information, and caused them to be used, to create counterfeit checks, knowing that the bank customers had not authorized the creation of the counterfeit checks or the use of their account information.

6. It was further part of the scheme that defendants KENNETH PEARSON and DAVID KOTLIKCY made and caused to be made false representations to the bank customers' financial institutions, and by doing so, changed customers' account information so that they could monitor the customers' accounts, intercept bank employees' questions about account activity, and prevent immediate detection of the scheme.

7. It was further part of the scheme that defendants KENNETH PEARSON, DAVID KOTLICKY, ERIC JACKSON, STACEY SANDERS, and DEANGRIA WELLS, and others, recruited runners to take the counterfeit checks to bank branches of American Chartered Bank, Chase Bank, Citibank, Fifth Third Bank, First Midwest Bank,

Harris Bank, and U.S. Bank in the Northern District of Illinois, and elsewhere, to cash the counterfeit checks.

8. It was further part of the scheme that defendants KENNETH PEARSON, DAVID KOTLICKY, ERIC JACKSON, STACEY SANDERS, and DEANGRIA WELLS, and others, collected proceeds of the counterfeit checks from runners, paid the runners a fee for cashing the counterfeit checks, and caused the remaining proceeds of the counterfeit checks to be distributed to PEARSON.

9. It was further part of the scheme that defendants DAVID KOTLICKY, ERIC JACKSON, ROGER ELAM, ROSIE ELAM, ANTIONE MAHONE, LYNADA MAHONE, TOVISE STONE, STARLINDA STUBBS, and DEANGRIA WELLS, and other runners, took counterfeit checks inside the banks, presented them to be cashed, cashed and attempted to cash the checks, and took and shared in the proceeds, knowing that the checks were counterfeit and that they were not entitled to present the checks for cashing or to take any part of the checks' proceeds.

10. It was further part of the scheme that defendants' actions exposed the financial institutions to a risk of loss, and caused actual losses to the financial institutions.

11. It was further part of the scheme that defendants misrepresented, concealed, and hid, and caused to be misrepresented, concealed, and hidden, certain material facts, including the acts and purposes of the acts done in furtherance of the scheme.

12. As a result of the scheme, defendants and their co-schemers fraudulently attempted to obtain over \$1 million, and actually obtained hundreds of thousands of dollars.

13. On or about the following dates, at the following locations, in the Northern District of Illinois, Eastern Division, and elsewhere, the following defendants executed and attempted to execute the scheme, by presenting and causing to be presented a counterfeit check for cashing at the identified financial institution:

<u>Count</u>	<u>Defendants</u>	<u>Date</u>	<u>Location</u>	<u>Check</u>	<u>Bank</u>
1	KENNETH PEARSON STACEY SANDERS LYNADA MAHONE	8/9/11	Chicago	\$2,500 on account of Victim CW	Chase
2	KENNETH PEARSON LYNADA MAHONE	8/12/11	Chicago	\$2,400 on account of Victim SS	Chase
3	KENNETH PEARSON DAVID KOTLICKY	8/17/11	Oak Brook	\$2,500 on account of Victim AC	Chase
4	KENNETH PEARSON DAVID KOTLICKY	8/17/11	Burbank	\$2,500 on account of Victim AC	Chase
5	KENNETH PEARSON DAVID KOTLICKY	8/18/11	Chicago	\$2,500 on account of Victim AC	Chase
6	KENNETH PEARSON DAVID KOTLICKY ANTIONE MAHONE	8/18/11	Evanston	\$2,500 on account of Victim AC	Chase
7	KENNETH PEARSON DAVID KOTLICKY	10/5/11	Worth	\$2,500 on account of Victim SSD	Chase
8	KENNETH PEARSON DAVID KOTLICKY STARLINDA STUBBS	10/26/11	Chicago	\$2,500 on account of Victim MG	Chase

<u>Count</u>	<u>Defendants</u>	<u>Date</u>	<u>Location</u>	<u>Check</u>	<u>Bank</u>
9	KENNETH PEARSON LYNADA MAHONE	10/27/11	Addison	\$2,500 on account of Victim MG	Chase
10	KENNETH PEARSON TOVISE STONE	10/27/11	Arlington Heights	\$2,500 on account of Victim MG	Chase
11	KENNETH PEARSON ANTIONE MAHONE	10/28/11	Niles	\$2,500 on account of Victim MG	Chase
12	KENNETH PEARSON ANTIONE MAHONE	11/9/11	Niles	\$2,500 on account of Victim CTJ	Chase
13	KENNETH PEARSON DAVID KOTLICKY STARLINDA STUBBS	11/14/11	Romeoville	\$2,500 on account of Victim BF	Chase
14	KENNETH PEARSON TOVISE STONE	11/18/11	Schaumburg	\$2,500 on account of Victim LKK	Chase
15	KENNETH PEARSON DAVID KOTLICKY	1/11/12	Glenview	\$2,500 on account of Victim WM	Chase
16	KENNETH PEARSON DAVID KOTLICKY ROGER ELAM	1/11/12	Northbrook	\$2,500 on account of Victim WM	Chase
17	KENNETH PEARSON ROGER ELAM	1/21/12	Northfield	\$2,500 on account of Victim NV	Chase
18	KENNETH PEARSON DAVID KOTLICKY	2/2/12	Crystal Lake	\$2,500 on account of Victim NYSC	Chase
19	KENNETH PEARSON DAVID KOTLICKY	2/13/12	Woodstock	\$2,370 on account of Victim N	Chase
20	KENNETH PEARSON DAVID KOTLICKY DEANGRIA WELLS	2/16/12	Skokie	\$2,500 on account of Victim MB	Chase

<u>Count</u>	<u>Defendants</u>	<u>Date</u>	<u>Location</u>	<u>Check</u>	<u>Bank</u>
21	KENNETH PEARSON ROGER ELAM	4/6/12	Oak Park	\$3,200 on account of Victim RS	Citibank
22	KENNETH PEARSON ERIC JACKSON	4/6/12	Naperville	\$4,200 on account of Victim RS	Citibank
23	KENNETH PEARSON ROSIE ELAM	4/9/12	Chicago	\$3,800 on account of Victim RS	Citibank
24	KENNETH PEARSON DAVID KOTLICKY DEANGRIA WELLS	4/11/12	Chicago	\$3,500 on account of Victim JC	Harris
25	KENNETH PEARSON DAVID KOTLICKY DEANGRIA WELLS	4/13/12	Chicago	\$3,700 on account of Victim MW	Bank of America
26	KENNETH PEARSON DAVID KOTLICKY	4/26/12	Streamwood	\$2,500 on account of Victim SBG	Chase
27	KENNETH PEARSON ERIC JACKSON	5/3/12	Chicago	\$3,800 on account of Victim JG	Citibank
28	KENNETH PEARSON ROSIE ELAM	5/3/12	Lombard	\$2,500 on account of Victim JG	Citibank
29	KENNETH PEARSON LATRESE LESHORE ROSIE ELAM	6/1/12	Elk Grove Village	\$2,500 on account of Victim ET	Chase
30	KENNETH PEARSON LATRESE LESHORE TOVISE STONE	6/15/12	Chicago	\$3,800 on account of Victim SS	Citibank
31	KENNETH PEARSON DAVID KOTLICKY LATRESE LESHORE	9/26/12	Aurora	\$3,500 on account of Victim MS	U.S. Bank
32	KENNETH PEARSON DAVID KOTLICKY LATRESE LESHORE	11/5/12	Lombard	\$2,300 on account of Victim STP	Fifth Third Bank

All in violation of Title 18, United States Code, Section 1344.

COUNT THIRTY-THREE

The SPECIAL JANUARY 2012 GRAND JURY further charges:

On or about August 17, 2011, at Chicago and Oak Brook, in the Northern District of Illinois, Eastern Division, and elsewhere,

KENNETH PEARSON and
DAVID KOTLICKY,

defendants herein, during and in relation to the bank fraud charged in Count Three of this Indictment, did knowingly possess and use, without lawful authority, a means of identification of another person, namely, the name, account number, user ID, and taxpayer identification number of Individual RM;

In violation of Title 18, United States Code, Section 1028A(a)(1).

COUNT THIRTY-FOUR

The SPECIAL JANUARY 2012 GRAND JURY further charges:

On or about August 18, 2011, at Evanston and Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

STACEY SANDERS,

defendant herein, during and in relation to the bank fraud charged in Count Six of this Indictment, did knowingly transfer and possess, and cause to be transferred, used, and possessed, without lawful authority, a means of identification of another person, namely, the name and account number of Individual RM;

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

COUNT THIRTY-FIVE

The SPECIAL JANUARY 2012 GRAND JURY further charges:

On or about May 3, 2012, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

ERIC JACKSON,

defendant herein, during and in relation to the bank fraud charged in Count Twenty-Seven of this Indictment, did knowingly possess and use, without lawful authority, a means of identification of another person, namely, the name and account number of Individual JG;

In violation of Title 18, United States Code, Section 1028A(a)(1).

COUNT THIRTY-SIX

The SPECIAL JANUARY 2012 GRAND JURY further charges:

On or about June 15, 2012, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

LATRESE LESHORE,

defendant herein, during and in relation to the bank fraud charged in Count Thirty of this Indictment, did knowingly transfer and possess, and cause to be transferred, possessed, and used, without lawful authority, a means of identification of another person, namely, the name and account number of Individual SS;

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

COUNT THIRTY-SEVEN

The SPECIAL JANUARY 2012 GRAND JURY further charges:

On or about October 11, 2012, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

DAVID KOTLICKY,

defendant herein, transferred and delivered a counterfeited obligation of the United States, namely, \$80 in counterfeited Federal Reserve Notes, with the intent that the same be passed, published, and used as true and genuine;

In violation of Title 18, United States Code, Section 473.

FORFEITURE ALLEGATION

The SPECIAL JANUARY 2012 GRAND JURY further alleges:

1. The allegations in Counts One through Thirty-Two of this indictment are incorporated here for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 982(a)(2)(A) and Title 28, United States Code, Section 2461(c).

2. As a result of their violations of Title 18, United States Code, Section 1344, as alleged above,

KENNETH PEARSON and
DAVID KOTLICKY,

defendants herein, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(2)(A) and Title 28, United States Code, Section 2461(c), any and all right, title, and interest they may have in any property constituting, and derived from, proceeds they obtained directly or indirectly as the result of such violations.

3. The interests of defendants PEARSON and KOTLICKY subject to forfeiture pursuant to Title 18, United States Code, Section 982(a)(2)(A) and Title 28, United States Code, Section 2461(c), include approximately \$1 million.

4. If any of the forfeitable property described above, as a result of any act or omission by defendants:

- (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,

the United States of America shall be entitled to forfeiture of substitute property under the provisions of Title 21, United States Code, Section 853(p) as incorporated by Title 28, United States Code, Section 2461(c);

All pursuant to Title 18, United States Code, Section 982(a)(2)(A) and Title 28, United States Code, Section 2461(c).

A TRUE BILL:

FOREPERSON

ACTING UNITED STATES ATTORNEY