

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

UNITED STATES OF AMERICA : **CRIMINAL NUMBER:** _____

v. : **DATE FILED:** _____

BRANDON JEWELL-WRIGHT : **VIOLATIONS:**
: **18 U.S.C. § 371 (conspiracy to commit**
: **an offense against the United States - 1**
: **count)**
: **18 U.S.C. § 1344 (bank fraud - 5 counts)**
: **18 U.S.C. § 2 (aiding and abetting)**
: **Notice of forfeiture**

INFORMATION

COUNT ONE

THE UNITED STATES ATTORNEY CHARGES:

At all times relevant to this information:

1. Wachovia Bank (“Wachovia”) was a bank in Philadelphia, Pennsylvania. Wachovia was insured by the Federal Deposit Insurance Corporation (“FDIC”). Wachovia’s FDIC certificate number was 333869.
2. Aimco Properties, L.P. (“Aimco”) was a real estate company located in North Carolina. Aimco had a checking account at Centura Bank (“Centura”) in Durham, North Carolina. Centura was insured by the FDIC, certificate number 3690.
3. Korman Residential Development Corporation (“Korman”) was a real estate company located in Philadelphia, Pennsylvania area. Korman had a checking account at Bank of America (“BOA”). BOA was insured by the FDIC, certificate number 25178.

4. Legacy Title & Escrow Incorporated (“Legacy”) was a real estate title company in Philadelphia, Pennsylvania. Legacy maintained a checking account with BOA.

5. Tate Bywater & Fuller Limited (“Tate”) was business enterprise with multiple offices in Philadelphia Pennsylvania area. Tate maintained a checking account with BOA.

6. Defendant BRANDON JEWELL-WRIGHT was employed by Wachovia as a teller at the bank’s Plymouth Meeting branch office.

7. Defendant BRANDON JEWELL-WRIGHT sold Wachovia Bank customer account information to another person for cash.

8. From in or about January 2007 to in or about September 2007 in Plymouth Meeting, in the Eastern District of Pennsylvania, defendant

BRANDON JEWELL-WRIGHT

conspired and agreed with others known and unknown to the United States Attorney, to commit an offense against the United States, that is, to knowingly execute a scheme to defraud Wachovia Bank and to obtain money under the care of that bank by means of false pretenses, representations and promises, in violation of Title 18, United States Code Section 1344.

MANNER AND MEANS

9. It was part of the conspiracy that defendant BRANDON JEWELL-WRIGHT made computer inquiries into the accounts of Wachovia’s customers for the purpose of determining the balances in their accounts and the account holder’s date of birth and social security number.

It was further a part of the conspiracy that:

10. Defendant BRANDON JEWELL-WRIGHT obtained the names, addresses, social security numbers and account bank balances for some of Wachovia's customers which he then sold for cash to another conspirator.

11. That conspirator, and others unknown to the United States Attorney, prepared counterfeit corporate checks. The bogus checks were payable to the Wachovia Bank customers whose names, social security numbers, addresses and account balances had been sold for cash by defendant BRANDON JEWELL-WRIGHT.

12. The counterfeit checks were presented to tellers at various Wachovia Branches throughout Philadelphia for either deposit, followed by a withdrawal, or for cashing. The bogus checks were honored based on the identification presented by the check presenter and the balances in the accounts of the Wachovia customers for whom the checks had been made payable.

OVERT ACTS

In further of the conspiracy and to accomplish its object, Defendant BRANDON JEWELL-WRIGHT committed the following overt acts, among others, in the Eastern District of Pennsylvania:

1. On or about August 24, 2007, a \$1,500 counterfeit corporate check drawn on Korman Residential Development Corporation's Bank of America account was cashed at Wachovia's Olney Branch. The person who cashed the check purported to be a Wachovia customer with the initials of A.B. This individual presented a Pennsylvania Driver's License, with the last four digits of 8251, as identification.

2. On or about August 25, 2007, a \$1,500 counterfeit corporate check drawn on Korman Residential Development Corporation's Bank of America account was cashed at Wachovia's Allegheny Branch. The person who cashed the check purported to be Wachovia customer with the initials of M.M. This individual presented a Pennsylvania Driver's License, with the last four digits of 6925, as identification.

3. On or about August 27, 2007, a \$1,625 counterfeit corporate check drawn on Korman Residential Development Corporation's Bank of America account was cashed at Wachovia's Academy Plaza Branch. The person who cashed the check purported to be a Wachovia customer with the initials of J.W. This individual presented a Pennsylvania Driver's License, with the last four digits of 7281, as identification.

4. On or about August 28, 2007, a \$1,625 counterfeit corporate check drawn on Korman Residential Development Corporation's Bank of America account was cashed at Wachovia's Roxborough Branch. The person who cashed the check purported to be a Wachovia customer with the initials of J.G. This individual presented a Pennsylvania Driver's License, with the last four digits of 5041, as identification.

5. On or about August 28, 2007, a \$1,625 counterfeit corporate check drawn on Korman Residential Development Corporation's Bank of America account was cashed at Wachovia's Andalusia Branch. The person who cashed the check purported to be a Wachovia customer with the initials of C.M. This individual presented a Pennsylvania Driver's License, with the last four digits of 8632, as identification.

All in violation of Title 18, United States Code, Section 371.

COUNTS TWO THROUGH SIX**THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:**

1. Paragraphs 1 through 7 and overt acts 1 through 5 of Count One are incorporated here.
2. From in our about January 2007 to in or about September 2007 defendant

BRANDON JEWELL-WRIGHT

knowingly executed and attempted to execute, and aided and abetted and willfully caused the execution of, a scheme to defraud Wachovia and to obtain money owned by and under the care, custody and control of that bank by means of false and fraudulent pretenses, representations and promises by the presentation and conversion to cash of counterfeit checks as described below:

Count	Wachovia Customer Initial & Account Number	Date of Transaction	Maker's Name	Driver License Number
2	A.B. - Last four digits of account number: 5659	8/24/2007	Korman Residential Development Corporation	Last four digits of Pa. Driver License: 8251
3	M.M. - Last four digits of account number: 3109	8/25/2007	Korman Residential Development Corporation	Last four digits of Pa. Driver License: 6925
4	J.W. - Last four digits of account number: 1830	8/27/2007	Korman Residential Development Corporation	Last four digits of Pa. Driver License: 7281
5	J.G. - Last four digits of account number: 4314	8/28/2007	Korman Residential Development Corporation	Last four digits of Pa. Driver License: 5041

Count	Wachovia Customer Initial & Account Number	Date of Transaction	Maker's Name	Driver License Number
6	C.M. - Last four digits of account number: 2295	8/28/2007	Korman Residential Development Corporation	Last four digits of Pa. Driver License: 8632

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

NOTICE OF FORFEITURE

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

1. As a result of the violations of Title 18, United States Code, Section 1344, as charged in this information, defendants

BRANDON JEWELL-WRIGHT

shall forfeit to the United States any and all property, real or personal, involved in such offenses, or any property traceable to such property, including, but not limited to a sum of money equal to \$255,087.04 in United States Currency.

2. If any of the forfeitable property, as describe above, as a result of any act or omission of the defendant:

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

it is the intent of the United States, pursuant to 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 described above.

In violation of Title 18, United States Code, Section 982 (a)(2)(A).

ZANE DAVID MEMEGER
UNITED STATES ATTORNEY