

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

UNITED STATES OF AMERICA : **CRIMINAL NO.** _____
 :
v. : **DATE FILED:** _____
 :
KHALIL CARTER : **VIOLATIONS:**
 : **18 U.S.C. § 1029(b)(2) (conspiracy to**
 : **commit access device fraud - 1 count)**
 : **18 U.S.C. § 1029(a)(1) (using and**
 : **attempting to use counterfeit access**
 : **devices - 1 count)**

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

1. From in or about 2004, to on or about April 19, 2006, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendant

KHALIL CARTER

conspired and agreed, together and with others known and unknown to the grand jury, to commit an offense against the United States, that is, to knowingly and with intent to defraud, use and attempt to use counterfeit access devices, in violation of Title 18, United States Code, Section 1029(a)(1) and (b)(1).

MANNER AND MEANS

It was part of the conspiracy that:

2. Persons known to the grand jury made counterfeit credit and debit cards

and gave them to defendant KHALIL CARTER to use.

3. Defendant KHALIL CARTER paid approximately \$150 to \$200 per counterfeit card received.

4. Defendant Khalil Carter used the counterfeit credit and debit cards at stores in the Philadelphia, Pennsylvania area, New Jersey, Maryland, and Virginia, to purchase and attempt to purchase items, including gift cards, valued at over \$34,000.

OVERT ACTS

In furtherance of the conspiracy, defendant KHALIL CARTER, and others known and unknown to the grand jury, committed the following overt acts in the Eastern District of Pennsylvania and elsewhere:

1. On or about July 14, 2005, defendant KHALIL CARTER used a counterfeit credit card to purchase approximately \$305 worth of items at Wawa, in Conshohocken, Pennsylvania, and Super Fresh, in Gladwyne, Pennsylvania, and attempted to purchase approximately \$100 worth of items at Wawa, in Bala Cynwyd, Pennsylvania.

2. On or about November 21, 2005, defendant KHALIL CARTER used a counterfeit credit card to purchase approximately \$400 worth of gift cards at Game Stop, in Mt. Laurel, New Jersey.

3. On or about November 22, 2005, defendant KHALIL CARTER used a counterfeit credit card to purchase approximately \$400 worth of gift cards at Wawa, in Egg Harbor, New Jersey.

All in violation of Title 18, United States Code, Section 1029(b)(2).

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 14, 2005, in the Eastern District of Pennsylvania, defendant

KHALIL CARTER

knowingly and with the intent to defraud used, and attempted to use, one or more counterfeit access devices, that is, a counterfeit Visa credit card, account number ending in 6641, in the name of K.F., to purchase approximately \$305 worth of items at Wawa, in Conshohocken, Pennsylvania, and Super Fresh, in Gladwyne, Pennsylvania, and to attempt to purchase approximately \$100 worth of items at Wawa, in Bala Cynwyd, Pennsylvania, thereby affecting interstate and foreign commerce.

In violation of Title 18, United States Code, Section 1029(a)(1) and (b)(1).

A TRUE BILL:

GRAND JURY FOREPERSON

PATRICK L. MEEHAN
UNITED STATES ATTORNEY