

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

UNITED STATES OF AMERICA	:	CRIMINAL NO. __06-_____
v.	:	DATE FILED: _____
SHARON MICKENS	:	VIOLATIONS:
	:	18 U.S.C. § 1341(mail fraud - 4 counts)
	:	18 U.S.C. § 2 (aiding and abetting)
		Notice of forfeiture

INFORMATION

COUNTS ONE THROUGH FOUR

THE UNITED STATES ATTORNEY CHARGES THAT:

At all times material to this information:

1. De Simone Suzuki and Isuzu (“De Simone”), 6101 Frankford Avenue, Philadelphia, Pennsylvania was engaged in the business of selling cars. As a car dealership, the business sought loans and leases for buyers of the cars. To process the loan and lease applications, the dealership required a loan application to be completed with personal identification of the buyer.

2. De Simone uses the internet at www.promaxonline.com to run the applicant’s credit history. Promax provides a credit score from the three major credit bureaus. Based on the credit score of the applicant, De Simone then searches for a lender. Once a lender accepts and approves the loan, all documents from the transaction are sent via commercial mail carrier, DHL, to the lending institution.

THE SCHEME

3. Between on or about September 16, 2005 and on or about November 11, 2005, defendant

SHARON MICKENS

devised and intended to devise and aided and abetted a scheme to defraud car dealerships and lending institutions, and to obtain money and property by means of false and fraudulent pretenses, representations, and promises.

MANNER AND MEANS

It was part of the scheme that:

4. Defendant SHARON MICKENS was employed as a car salesperson at De Simone. As a salesperson at De Simone, defendant MICKENS allowed others to use fraudulent and stolen identities to purchase or lease cars and to obtain loans.

It was further part of the scheme that:

5. Prior to the arrival of the person pretending to be the fraudulent or stolen identity, defendant SHARON MICKENS received a telephone call from H.T. advising that a buyer was coming.

6. Defendant SHARON MICKENS prepared and caused to be prepared false and fraudulent loan applications to lenders using identities which were fraudulent or stolen.

7. Based on the loan applications accepted by defendant SHARON MICKENS, lenders approved the loans containing the fraudulent names.

8. After each fraudulent transaction was completed, defendant SHARON MICKENS was paid a fee by H.T. for processing the fraudulent transaction.

9. On or about October 12, 2004, L.L. using the stolen identity of E.W.

appeared at De Simone to buy a 2001 Ford Mustang. Defendant SHARON MICKENS was the salesperson. Defendant MICKENS, who knew L.L. was using the false identity of E.W., prepared for L.L. a loan application in the name of E.W. and had L.L. sign as E.W. The vehicle was financed through North Fork Bank, Mattituck, New York for \$22,573.11. After the sale, the transaction package was sent by commercial mail carrier, DHL, to North Fork Bank, Mattituck, New York.

10. The true E.W. lives in Pennsylvania and had his identity stolen. The true E.W. gave no one permission to buy a car in his name or use his credit and personal information.

11. On or about October 18, 2004, an individual using the stolen identity of K.H. appeared at De Simone to buy a Cadillac Escalade. Defendant SHARON MICKENS was the salesperson. Defendant MICKENS, who knew the individual was using the false identity of K.H., prepared for the individual a loan application in the name of K.H. and had the individual sign as K.H. . The vehicle was financed through North Fork Bank, Mananuk, New York for \$42,929.49. After the sale, the transaction package was sent via commercial mail carrier, DHL, to North Fork Bank, Mattituck, New York.

12. The true K.H. lives in Indiana and had his identity stolen. The true K.H. gave no one permission to buy a car in his name or use his credit and personal information.

13. On or about November 8, 2004, an individual using the stolen identity C.B.-S. appeared at De Simone to buy a Cadillac Escalade. Defendant SHARON MICKENS was the salesperson. Defendant MICKENS, who knew the individual was using the false identity of C.B.-S., prepared for the individual a loan application in the name of C.B.-S. And had the individual sign as C.B.-S. The vehicle was financed through Wells Fargo Financial, Chester, Pennsylvania for \$39,195. After the sale, the transaction package was sent via commercial mail

carrier, DHL, to Wells Fargo Financial, Chester, Pennsylvania.

14. The true C.B.-S. lives in Pennsylvania and had her identity stolen. The true C.B.-S. gave no one permission to buy a car in her name or use her credit and personal information.

15. On or about November 24, 2004, an individual using the stolen identity of C.A.C. appeared at De Simone to buy a 2002 Buick Rendezvous. Defendant SHARON MICKENS was the salesperson. Defendant MICKENS, who knew the individual was using the false identity of C.A.C., prepared for the individual a loan application in the name of C.A.C. and had the individual sign as C.A.C. The vehicle was financed through Valley National Bank, Wayne, New Jersey for \$27,636. After the sale, the transaction package was sent by commercial mail carrier, DHL, to Valley National Bank, Wayne, New Jersey.

16. The true C.A.C. lives in Georgia and had her identity stolen. The true C.A.C. gave no one permission to buy a car in her name or use her credit and personal information.

17. On or about each of the dates set forth below, in the Eastern District of Pennsylvania and elsewhere, defendant

SHARON MICKENS,

for the purpose of executing the scheme described above and attempting to do so, and aiding and abetting its execution, knowingly caused to be delivered by commercial interstate carrier according to the directions thereon, the item described below for each count:

COUNT	DATE	DESCRIPTION
1	October 12, 2004	Transaction documents for a 2001 Ford Mustang, in the name of E.L. from De Simone, Philadelphia, Pennsylvania to North Fork Bank, Mattituck, New York via DHL commercial mail service.
2	October 18, 2004	Transaction documents for a 2002 Cadillac Escalade, in the name of K.H. from De Simone Suzuki, Philadelphia, Pennsylvania to North Fork Bank, Mattituck, New York via DHL commercial mail service.
3	November 8, 2004	Transaction documents for a 2002 Cadillac Escalade, in the name of C.B.-S. from De Simone Philadelphia, Pennsylvania to Wells Fargo Financial, Chester, Pennsylvania via DHL commercial mail service.
4	November 24, 2004	Transaction document for a 2002 Buick Rendevous, in the name of C.A.C. from De Simone, Philadelphia, Pennsylvania to Valley National Bank, Wayne, New Jersey via DHL commercial mail service.

All in violation of Title 18, United States Code, Sections 1341 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 1343, described in this information, defendant

SHARON MICKENS

shall forfeit to the United States of America any property, real or personal, which constitutes or is derived from proceeds traceable to such offense, including, but not limited to the following:

A. The sum of \$132,333.60 in United States currency (forfeiture money judgment).

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 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 981 and Title 28, United States Code, Section 2461.

PATRICK L. MEEHAN
United States Attorney