

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

<b>UNITED STATES OF AMERICA</b>	<b>:</b>	<b>CRIMINAL NO.</b> _____
<b>v.</b>	<b>:</b>	<b>DATE FILED:</b> _____
<b>STANLEY YOUNG</b> <b>a/k/a "Peanut"</b>	<b>:</b>	<b>VIOLATIONS:</b> <b>18 U.S.C. § 1344 (bank fraud - 1 count)</b>
	<b>:</b>	

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**INFORMATION**

**COUNT ONE**

**THE UNITED STATES ATTORNEY CHARGES THAT:**

At all times material to this information:

1. The following banks were financial institutions, insured by the Federal Deposit Insurance Corporation:

- a) Citizens Bank, certificate number 57282;
- b) Commerce Bank, certificate number 25293;
- c) Wachovia Bank, certificate number 33869;
- d) PNC Bank, certificate number 6384;
- e) Uninvest Bank, certificate number 7759;
- f) Firsttrust Bank, certificate number 26647; and
- g) Sovereign Bank, certificate number 29950-2.

2. From in or about November 2003, through in or about April 2006, in Philadelphia, in the Eastern District of Pennsylvania and elsewhere, defendant

**STANLEY YOUNG,  
a/k/a “Peanut,”**

knowingly executed, and attempted to execute, a scheme to defraud Citizens Bank, Commerce Bank, Wachovia Bank, PNC Bank, Univest Bank, Firsttrust Bank, and Sovereign Bank, and to obtain monies owned by and under the care, custody, and control of these banks by means of false and fraudulent pretenses, representations, and promises.

**THE SCHEME**

3. Kasimu Clark recruited Derrick Rooker, both charged elsewhere, to recruit and lead a group of check-cashers who would enter banks and cash fraudulent checks by using stolen identities of the true bank account holders.

4. Derrick Rooker enlisted defendant STANLEY YOUNG to rent cars and drive the check-cashers to the banks to cash the fraudulent checks and make unauthorized withdrawals.

5. Defendant STANLEY YOUNG rented cars at Enterprise Car Rental with money provided by Derrick Rooker and Kasimu Clark.

6. Kasimu Clark recruited bank employees to provide names and account information of bank customers.

7. Derrick Rooker led a team of check-cashers which included Sandra Lawson, George Taylor, James Butler, Robert Lieszewski, and Kelly Bauldree, all charged elsewhere, and others known and unknown to the United States Attorney.

8. Per instructions from Kasimu Clark, Derrick Rooker and defendant STANLEY YOUNG caused pictures to be taken of all check-cashers and provided these pictures to defendant CLARK.

9. Kasimu Clark caused the pictures of the check-cashers to be placed on fraudulent identifications, such as driver's licenses, with the information regarding the bank customer.

10. Kasimu Clark distributed the fraudulent checks and the fraudulent identifications to Derrick Rooker and defendant STANLEY YOUNG so that the check-cashers could attempt to cash the counterfeit checks at banks throughout the Eastern District of Pennsylvania and elsewhere by displaying the fraudulent identification when necessary.

11. A check-casher was sometimes given more than one stolen identity to portray each day.

12. Defendant STANLEY YOUNG drove Derrick Rooker and the group of check-cashers to banks from which account information and customer identities were stolen.

13. With the fraudulent means of identification and personal and bank account information provided by Kasimu Clark through Derrick Rooker or defendant STANLEY YOUNG, the check-cashers entered the bank and pretended to be legitimate bank customers in order to cash the stolen, counterfeit, and otherwise unauthorized checks at the banks and to make unauthorized withdrawals from the banks.

14. When the check-cashers successfully cashed counterfeit checks or made a withdrawal, they returned to the car and gave the cash to Derrick Rooker, who was often in the car, or defendant STANLEY YOUNG in Rooker's absence.

15. Defendant STANLEY YOUNG drove the check-cashers to as many banks as necessary to cash all the checks provided.

16. At the end of a day of cashing fraudulent checks, Derrick Rooker or defendant STANLEY YOUNG in Rooker's absence, collected all of the fraudulent identifications from the check-cashers and paid them for their services.

17. The check-cashers gave defendant STANLEY YOUNG a gratuity for driving them.

18. Derrick Rooker or defendant STANLEY YOUNG met with Kasimu Clark and returned the cash from the fraudulent checks cashed each day and the fraudulent identifications.

19. Kasimu Clark paid Derrick Rooker and defendant STANLEY YOUNG for their services.

20. Through operation of this scheme, defendant STANLEY YOUNG participated in defrauding Citizens Bank, Commerce Bank, Wachovia Bank, PNC Bank, Firsttrust Bank, Uninvest Bank and Sovereign Bank of approximately \$1,215,004.

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

**NOTICE OF FORFEITURE**

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

**STANLEY YOUNG**

shall forfeiture to the United States of America any property, real or personal, that constitutes or is derived from proceeds traceable to the commission of such offenses, as charged in this information, including, but not limited to, the sum of \$1,215,004.20.

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;
- (dc) 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 928(b), 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).

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**PATRICK L. MEEHAN**  
**UNITED STATES ATTORNEY**