



a forgery, in violation of Wisconsin Statutes Sections 943.38(2) and 939.05, forgery, in violation of Ohio Revised Code Section 2913.31(A)(3), and possession of criminal tools, in violation of Ohio Revised Statutes Section 2923.24(A); possession of a fictitious ID card, in violation of 15 Illinois Consolidated Statutes Section 335/14B(b)(1), and forgery, in violation of Georgia Statute § 16-9-2.

2. It was the object of the conspiracy that the defendants and coconspirators would obtain the personal identification information of other persons such as names, social security numbers, dates of birth, and bank account numbers. The defendants and their coconspirators would then use the information to deceive retail stores, banks, and other businesses for the purpose of obtaining money and property from the retail stores, banks, and other businesses.

3. To effect the object of the conspiracy, the defendants and coconspirators did commit the following acts, among others, in the Northern District of Illinois, Western Division, and elsewhere:

(a) On or about June 15, 2010, in Rockford, Illinois, defendant TONY HARDY possessed a fictitious Massachusetts driver's license.

(b) On or about June 15, 2010, in Rockford, Illinois, defendants TONY HARDY and MARK GRIFFIN possessed counterfeit checks bearing personal identification information of other persons and merchandise that had been fraudulently obtained from various store locations of a retail business that operates in or affects interstate commerce.

(c) On or about June 15, 2010, at the Rockford, Illinois store location of a retail business that operates in or affects interstate commerce, defendant MARK GRIFFIN attempted to obtain a cash refund for merchandise that had been fraudulently obtained from a different store location of the same retail business.

(d) At a time unknown to the Grand Jury, in Rockford, Illinois, defendants TONY HARDY and ANTHONY TAYLOR obtained the names, bank account numbers, social security numbers and dates of birth of not less than sixteen individuals, all of which defendants TONY HARDY and ANTHONY TAYLOR knew had been stolen from a medical office.

(e) On or about May 9, 2011, at Cincinnati, Ohio, defendants TONY HARDY and ANTHONY TAYLOR possessed multiple fake drivers licenses, counterfeit checks, merchandise that had been fraudulently obtained from various store locations of a retail business that operates in or affects interstate commerce, and the stolen names, bank account numbers, social security numbers, and dates of birth they had acquired in Rockford, Illinois.

In violation of Title 18, United States Code, Section 371.

A TRUE BILL:

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FOREPERSON

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UNITED STATES ATTORNEY