

**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>RASHIN OWENS, a/k/a "Ro," ELTON HARRIS, a/k/a "EL," TAMEA HILL</b>	<b>:</b>	<b>VIOLATIONS:</b>
	<b>:</b>	<b>18 U.S.C. § 371 (conspiracy - 1 count)</b>
	<b>:</b>	<b>18 U.S.C. § 1344 (bank fraud - 1 count)</b>
	<b>:</b>	<b>18 U.S.C. § 1028A (aggravated identity theft - 4 counts)</b>
	<b>:</b>	<b>18 U.S.C. § 1030 (use of computer in connection with bank fraud - 1 count)</b>
	<b>:</b>	<b>18 U.S.C. § 2 (aiding and abetting)</b>
	<b>:</b>	<b>Notice of forfeiture</b>
	<b>:</b>	

**INDICTMENT**

**COUNT ONE**

**THE GRAND JURY CHARGES THAT:**

At all times material to this indictment:

1. Citizens Bank was a financial institution, the deposits of which were insured by the Federal Deposit Insurance Corporation, certificate number 57282.
2. Defendant TAMEA HILL worked as a teller for Citizens Bank at a branch located at Philadelphia, Pennsylvania, where she had access to the identity information of the bank's customers, including names, social security numbers, dates of birth, and account numbers, as well as account balance information.

3. From in or about July 2006 through on or about October 16, 2006, in Philadelphia, in the Eastern District of Pennsylvania, the District of Delaware, and elsewhere, defendants

**RASHIN OWENS,  
a/k/a "Ro,"  
ELTON HARRIS,  
a/k/a "El," and  
TAMEA HILL**

conspired and agreed, together and with others known and unknown to the grand jury, to commit offenses against the United States, that is, to knowingly execute and attempt to execute a scheme to defraud Citizens Bank, in violation of Title 18, United States Code, Section 1344, and to knowingly and without lawful authority use a means of identification of another person, during and in relation to a bank fraud, in violation of Title 18, United States Code, Section 1028A(a)(1), (c)(5).

#### **MANNER AND MEANS**

4. The defendants used stolen identification information to assist in cashing fraudulent checks and making fraudulent withdrawals.

5. Defendant RASHIN OWENS paid for stolen identification information and provided that information to other individuals to create and cash fraudulent checks.

6. Defendant ELTON HARRIS recruited defendant TAMEA HILL, an employee of Citizens Bank, to provide to defendant HARRIS and defendant RASHIN OWENS account numbers, account balances, and the names, addresses and social security numbers of Citizens Bank account holders for cash.

7. Defendant TAMEA HILL used her position at Citizens Bank to improperly access computerized account information for Citizens Bank account holders and provided defendants ELTON HARRIS and RASHIN OWENS with names, addresses, social security numbers, dates of birth, and account numbers of Citizens Bank account holders and also provided defendants HARRIS and OWENS with account information for Citizens Bank account numbers given to her by defendants HARRIS and OWENS.

8. Defendant RASHIN OWENS provided the Citizens Bank customer account information from defendants TAMEA HILL and ELTON HARRIS to other individuals involved in the scheme who manufactured false photographic identifications in the name of those customers of Citizens Bank, using the picture of individuals recruited to act as “check runners,” for use in the cashing of fraudulent checks and making of fraudulent withdrawals from the accounts of those Citizens Bank customers.

9. By this scheme, defendants RASHIN OWENS, ELTON HARRIS and TAMEA HILL assisted other individuals involved in the scheme to obtain approximately \$17,385 from the cashing of fraudulent checks and making of fraudulent withdrawals from the accounts of Citizens Bank customers.

### **OVERT ACTS**

In furtherance of the conspiracy, defendants RASHIN OWENS, ELTON HARRIS and TAMEA HILL committed the following overt acts in the Eastern District of Pennsylvania and elsewhere:

1. Between on or about July 1, 2006 and on or about August 29, 2006, defendant ELTON HARRIS recruited defendant TAMEA HILL to improperly access computerized account information of customers of Citizens Bank and to provide him with personal identifying information and account information of Citizens Bank customers.

2. Between on or about July 1, 2006 and on or about September 13, 2006, defendant TAMEA HILL provided defendant ELTON HARRIS with multiple Citizens Bank customers' account and personal information, including names, social security numbers, account numbers, and account balances.

3. Between on or about July 1, 2006 and on or about October 16, 2006, defendant ELTON HARRIS provided defendant RASHIN OWENS with the Citizens Bank customer account and personal information that HARRIS had received from defendant TAMEA HILL, and OWENS paid HARRIS for that account information.

4. Between on or about September 7, 2006 and on or about October 16, 2006, defendant RASHIN OWENS provided other persons involved in the scheme with the Citizens Bank customer account and personal information that he had received from defendants ELTON HARRIS and TAMEA HILL, and those other individuals used that information to acquire or attempt to acquire approximately \$21,085.00 from Citizens Bank by presenting fraudulent identification in the name of the account holder to Citizens Bank tellers and then withdrawing money from, attempting to withdraw money from, cashing counterfeit checks on, or attempting to cash counterfeit checks on, accounts belonging to those Citizens Bank account holders

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

**COUNT TWO**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. Paragraphs 1, 2 and 4-9 and Overt Acts 1-4 of Count One are realleged here.
2. From on or about July 1, 2006, through on or about October 16, 2006, in the Eastern District of Pennsylvania, the District of Delaware and elsewhere, defendants

**RASHIN OWENS,  
a/k/a "Ro,"  
ELTON HARRIS,  
a/k/a "El," and  
TAMEA HILL**

knowingly executed, attempted to execute, and aided and abetted the execution of, a scheme to defraud Citizens Bank, and to obtain monies owned by and under the care, custody, and control of that bank by means of false and fraudulent pretenses, representations, and promises.

**THE SCHEME**

3. The defendants used stolen account information to aid and abet in the manufacture of false identification documents and the cashing of fraudulent checks or the making of fraudulent withdrawals.
4. In furtherance of the scheme, other individuals cashed or attempted to cash the following counterfeit checks and made or attempted to make the following fraudulent withdrawals:

<u>DATE</u>	<u>LOCATION</u>	<u>VICTIM ACCOUNT</u> <u>HOLDER</u>	<u>AMOUNT</u>
9/07/06	Bala Cynwyd, PA	M.P.	\$800
9/15/06	Rehoboth Beach, DE	R.Z.	\$4,515
9/15/06	Georgetown, DE	M.S.	\$4,506
9/15/06	Lewes, DE	M.S.	\$4,511
9/20/06	Royersford, PA	M.P.	\$2,900
10/16/06	Dover, DE	B.F.	\$3,853

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

**COUNT THREE**

**THE GRAND JURY FURTHER CHARGES THAT:**

From on or about September 7, 2006, through on or about September 20, 2006, in the Eastern District of Pennsylvania, defendants

**RASHIN OWENS,  
a/k/a "Ro,"  
ELTON HARRIS,  
a/k/a "El," and  
TAMEA HILL**

knowingly and without lawful authority possessed and used, attempted to use, and aided and abetted the use of, a means of identification of another person, that is, the name and identifying information of M.P., during and in relation to bank fraud.

In violation of Title 18, United States Code, Sections 1028A(a)(1), (c)(5) and 2.

**COUNT FOUR**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about September 15, 2006, in the Eastern District of Pennsylvania and the District of Delaware, defendants

**RASHIN OWENS,  
a/k/a "Ro,"  
ELTON HARRIS,  
a/k/a "El," and  
TAMEA HILL**

knowingly and without lawful authority possessed and used, attempted to use, and aided and abetted the use of, a means of identification of another person, that is, the name and identifying information of R.Z., during and in relation to bank fraud.

In violation of Title 18, United States Code, Sections 1028A(a)(1), (c)(5) and 2.

**COUNT FIVE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about September 15, 2006, in the Eastern District of Pennsylvania and the District of Delaware, defendants

**RASHIN OWENS,  
a/k/a "Ro,"  
ELTON HARRIS,  
a/k/a "El," and  
TAMEA HILL**

knowingly and without lawful authority possessed and used, attempted to use, and aided and abetted the use of, a means of identification of another person, that is, the name and identifying information of M.S., during and in relation to bank fraud.

In violation of Title 18, United States Code, Sections 1028A(a)(1), (c)(5) and 2.

**COUNT SIX**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about October 16, 2006, in the Eastern District of Pennsylvania and the District of Delaware, defendants

**RASHIN OWENS,  
a/k/a "Ro,"  
ELTON HARRIS,  
a/k/a "El," and  
TAMEA HILL**

knowingly and without lawful authority possessed and used, attempted to use, and aided and abetted the use of, a means of identification of another person, that is, the name and identifying information of B.F., during and in relation to bank fraud.

In violation of Title 18, United States Code, Sections 1028A(a)(1), (c)(5) and 2.

**COUNT SEVEN**

**THE GRAND JURY FURTHER CHARGES THAT:**

From on or about July 1, 2006 through on or about September 13, 2006, in the Eastern District of Pennsylvania, defendant

**TAMEA HILL**

knowingly, and without authorization or in excess of authorized access, obtained information contained in a financial record of Citizens Bank, a federally insured financial institution doing business in interstate commerce.

In violation of Title 18, United States Code, Section 1030.

## **NOTICE OF FORFEITURE**

1. As a result of the violations of Title 18, United States Code, Sections 371, 1344 and 1028A, set forth in this indictment, defendants

**RASHIN OWENS,  
a/k/a "Ro,"  
ELTON HARRIS,  
a/k/a "El," and  
TAMEA HILL**

shall forfeit 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 indictment, including, but not limited to, the sum of \$21,085.

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 18, United States Code, Section 982(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).

**A TRUE BILL:**

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**FOREPERSON**



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**PATRICK L. MEEHAN**  
United States Attorney