

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

UNITED STATES OF AMERICA	:	CRIMINAL NO. _____
v.	:	DATE FILED: _____
MOSES WILLIAMS, SR.	:	VIOLATION: 18 U.S.C. § 1341 (mail fraud - 4 counts) 18 U.S.C. § 1028(a)(7) (identity theft - 4 counts) Notice of forfeiture

INFORMATION

COUNTS ONE THROUGH FOUR

THE UNITED STATES ATTORNEY CHARGES THAT:

At all times material to this information:

1. ACS Education Service, MRVU Funding SPV, Inc., and Sallie Mae were financial institutions which made loans to students for tuition at approved colleges.
2. From in or about October 2004, through in or about May 2006, defendant

MOSES WILLIAMS, SR.

devised and intended to devise a scheme to defraud various college tuition loan programs, and to obtain money and property by means of false and fraudulent pretenses, representations, and promises.

In furtherance of the scheme:

3. Defendant MOSES WILLIAMS, SR. used the personal identities of

various individuals, without their knowledge or consent, to support financial information in making fraudulent applications for college tuition loan programs, and obtaining money from the programs.

4. Defendant MOSES WILLIAMS, SR. prepared and submitted applications for college tuition loan programs in order to obtain money, and unlawfully used personal identifying information, such as social security numbers and other means of personal identification, in support of the financial information he provided in the loan applications.

5. Defendant MOSES WILLIAMS, SR. forged the signatures of various individuals on college loan applications and accompanying promissory notes in order to get loan checks mailed to his address in the names of other individuals, so that defendant WILLIAMS could cash the checks and use the money for his personal use, unrelated to any college or educational purposes as was required.

6. On or about February 23, 2005, defendant MOSES WILLIAMS, SR. falsely signed the name of C.W. and C.B. as co-borrowers to a college Tuition Answer Loan Application/Promissory Note issued through the Sallie Mae student loan program, and included fraudulent 2002, 2003 and 2004 Federal Income Tax Returns of C.B. which contained the unauthorized social security number of C.B. but the address of defendant WILLIAMS.

7. On or about March 3, 2005, as a result of the fraudulent February 23, 2005 Loan Application/Promissory Note and supporting federal income tax returns, prepared and submitted by defendant MOSES WILLIAMS, SR., a check in the amount of \$20,000 was issued through the Sallie Mae Loan Program: Tuition, payable to C.B., 3270 Vista Drive, Danielsville, PA 18038. The check was sent through the United States mail.

8. Defendant MOSES WILLIAMS, SR. endorsed the check with a forged signature of C.B., and then signed his own name as second endorser. Defendant WILLIAMS cashed the check for his own personal use.

_____9. On or about January 12, 2006, defendant MOSES WILLIAMS, SR. falsely signed the names of B.W. and F.S. as co-borrowers to a college Education Finance Partners Loan Application/Promissory Note issued through ACS Education Service, and included the unauthorized social security number of F.S. but the address of defendant WILLIAMS.

10. On or about January 23, 2006, as a result of the fraudulent January 12, 2006 Loan Application/Promissory Note, and supporting documents, prepared and submitted by defendant MOSES WILLIAMS, SR., a check in the amount of \$25,500 was issued through ACS Education Service, payable to B.W. and F.S., 3270 Vista Drive, Danielsville, PA 18038. The check was sent through the United States mail.

11. The defendant MOSES WILLIAMS, SR. endorsed the check with a forged signature of B.W. and F.S. Defendant WILLIAMS cashed the check for his own personal use.

_____12. On or about April 18, 2006, defendant MOSES WILLIAMS, SR. falsely signed the names of A.J. and L.K. as co-borrowers to a Richland State Bank college Loan Application/Promissory Note through ACS Education Services, and included the unauthorized social security number of L.K. but the address of defendant WILLIAMS.

13. On or about May 16, 2006, as a result of the fraudulent April 18, 2006 Loan Application/Promissory Note, and supporting documents, prepared and submitted by defendant MOSES WILLIAMS, SR., a check in the amount of \$25,500 was issued by Richland

State Bank through ACS Education Services, payable to A.J., 3270 Vista Drive, Danielsville, PA 18038. The check was sent through the United States mail.

14. The defendant MOSES WILLIAMS, SR. endorsed the check with a forged signature of A.J. Defendant WILLIAMS cashed the check for his own personal use.

15. On or about May 9, 2006, defendant MOSES WILLIAMS, SR. falsely signed the names of B.W. and R.H. as co-borrowers to a Student Loan Network college Loan Application/Promissory Note issued through MRU Funding SPV, Inc. , and included the unauthorized social security number of R.H. but the address of defendant WILLIAMS.

16. On or about May 16, 2006, as a result of the fraudulent May 9, 2006 Loan Application/Promissory Note, and supporting documents, prepared and submitted by defendant MOSES WILLIAMS, SR., a check in the amount of \$27,746 was issued through MRU Funding SPV, Inc., payable to B.W., 3270 Vista Drive, Danielsville, PA 18038. The check was sent through the United States mail.

17. Defendant MOSES WILLIAMS, SR. endorsed the check with a forged signature of B.W. Defendant WILLIAMS cashed the check for his own personal use.

18. As a result of the fraudulent scheme defendant MOSES WILLIAMS, SR. defrauded various college tuition loan programs of funds which caused losses in the amount of approximately \$362,264.00.

19. On or about the following dates, in the Eastern District of Pennsylvania and elsewhere, defendant

MOSES WILLIAMS, SR.,

for the purpose of executing the scheme described above, and attempting to do so, knowingly

caused to be delivered by mail according to the directions thereon, the following items, each mailing being a separate count:

<u>COUNT</u>	<u>DATE OF MAILING</u>	<u>ITEM</u>
1.	March 3, 2005	\$20,000 check from Sallie Mae Loan Program payable to C.B. at 3270 Vista Drive, Danielsville, PA 18038.
2.	January 23, 2006	\$25,500 check from ACS Education Service payable to B.W. and F.S. at 3270 Vista Drive, Danielsville, PA 18038.
3.	May 16, 2006	\$25,500 check from Richland State Bank through ACS Education Service payable to A.J. at 3270 Vista Drive, Danielsville, PA 18038.
4.	May 16, 2006	\$27,746 check from MRU Funding SPV, Inc. payable to B.W. at 3270 Vista Drive, Danielsville, PA 18038.

_____ All in violation of Title 18, United States Code, Section 1341.

COUNT FIVE

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

From in or about February 2005 to in or about March 2005, in Danielsville, in the Eastern District of Pennsylvania, and elsewhere, defendant

MOSES WILLIAMS, SR.

knowingly and without lawful authority used a means of identification of another person with the intent to commit a violation of federal law, that is, mail fraud in violation of Title 18, United States Code, Section 1341, by fraudulently using the social security number and identification of C.B. to unlawfully obtain a college tuition loan, and obtain in excess of \$1,000 during a one-year period.

All in violation of Title 18, United States Code, Section 1028(a)(7), (c)(3)(A).

COUNT SIX

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

In or about January 2006, in Danielsville, in the Eastern District of Pennsylvania, and elsewhere, defendant

MOSES WILLIAMS, SR.

knowingly and without lawful authority used a means of identification of another person with the intent to commit a violation of federal law, that is, mail fraud in violation of Title 18, United States Code, Section 1341, by fraudulently using the social security number and identification of F.S. to unlawfully obtain a college tuition loan, and obtain in excess of \$1,000 during a one-year period.

All in violation of Title 18, United States Code, Section 1028(a)(7), (c)(3)(A).

COUNT SEVEN

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

From in or about April 2006 to in or about May 2006, in Danielsville, in the Eastern District of Pennsylvania, and elsewhere, defendant

MOSES WILLIAMS, SR.

knowingly and without lawful authority used a means of identification of another person with the intent to commit a violation of federal law, that is, mail fraud in violation of Title 18, United States Code, Section 1341, by fraudulently using the social security number and identification of L.K. to unlawfully obtain a college tuition loan, and obtain in excess of \$1,000 during a one-year period.

All in violation of Title 18, United States Code, Section 1028(a)(7), (c)(3)(A).

COUNT EIGHT

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

In or about May 2006, in Danielsville, in the Eastern District of Pennsylvania, and elsewhere, defendant

MOSES WILLIAMS, SR.

knowingly and without lawful authority used a means of identification of another person with the intent to commit a violation of federal law, that is, mail fraud in violation of Title 18, United States Code, Section 1341, by fraudulently using the social security number and identification of R.H. to unlawfully obtain a college tuition loan, and obtain in excess of \$1,000 during a one-year period.

All in violation of Title 18, United States Code, Section 1028(a)(7), (c)(3)(A).

NOTICE OF FORFEITURE

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

1. As a result of the violations of Title 18, United States Code, Section 1341, set forth in this information, defendant

MOSES WILLIAMS, SR.

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, including, but not limited to the sum of Three Hundred and Sixty-Two Thousand Two Hundred and Sixty-Four Dollars (\$362,264).

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 of America, pursuant to Title 18, United States Code, Section 981(a)(1)(C), 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 28, United States Code, Section 2461(c) and Title 18, United States Code, Section 981(a)(1)(C).

LAURIE MAGID
Acting United States Attorney