

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

UNITED STATES OF AMERICA : **CRIMINAL NO. 09-**_____

v. : **DATE FILED: April 20, 2009**_____

RENILE WALKER : **VIOLATIONS:**
: **18 U.S.C. § 371 (conspiracy - 1 count)**
: **18 U.S.C. § 1344 (bank fraud - 5 counts)**
: **18 U.S.C. § 2 (aiding and abetting)**
: **Notice of forfeiture**

INFORMATION

COUNT ONE

THE UNITED STATES ATTORNEY CHARGES THAT:

1. From in or about December 2007 through in or about December 2008, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendant

RENILE WALKER

conspired and agreed, with others known and unknown to the United States Attorney, to commit an offense against the United States, that is, to knowingly execute, and attempt to execute, a scheme to defraud financial institutions, and to obtain monies owned by and under the care, custody, and control of these financial institutions by means of false and fraudulent pretenses, representations, and promises, in violation of Title 18, United States Code, Section 1344.

MANNER AND MEANS

It was a part of the conspiracy that:

2. Defendant RENILE WALKER and Vaughn Pierce, charged elsewhere, and others known and unknown to the United States Attorney, recruited others who permitted

defendant WALKER and others to deposit checks into their accounts with certain financial institutions.

3. Defendant RENILE WALKER and others known and unknown to the United States Attorney deposited checks into these accounts, knowing that the checks were fraudulent, in that they were forged, were written on closed accounts, were stolen, and/or lacked sufficient funds.

4. The account holders, at the direction of defendant RENILE WALKER and others known and unknown to the United States Attorney, then withdrew funds from these accounts, which were subsequently distributed among the account holders, defendant WALKER, and others known and unknown to the United States Attorney.

5. The fraudulent checks were subsequently dishonored, causing the financial institutions to suffer losses.

OVERT ACTS

In furtherance of the conspiracy and to accomplish its objects, defendant RENILE WALKER and others committed the following overt acts, among others, in the Eastern District of Pennsylvania and elsewhere:

1. On or about March 13, 2008, defendant RENILE WALKER deposited into the TD Bank account of J.S., a person known to the United States Attorney, a check in the amount of \$4,829, dated March 13, 2008, which was drawn on the account of T.J., a person known to the United States Attorney, and which had been forged by Vaughn Pierce.

2. On or about April 7, 2008, defendant RENILE WALKER deposited into the Citizens Bank account of C.D., a person known to the United States Attorney, a check in the

amount of \$4,563, dated April 7, 2008, which was drawn on the closed account of defendant WALKER, and which had been forged by Pierce.

3. On or about April 25, 2008, defendant RENILE WALKER directed D.W., a person known to the United States Attorney, to withdraw \$2,600 from his account with Beneficial Bank, after Vaughn Pierce had deposited into D.W.'s account a check in the amount of \$3,684, dated April 23, 2008, which was drawn on the account of T.J.K. and C.M.K., persons known to the United States Attorney, and which had been forged by Pierce.

4. On or about June 12, 2008, defendant RENILE WALKER deposited into the Wachovia Bank account of C.W., a person known to the United States Attorney, a check in the amount of \$3,863, dated June 12, 2008, which was drawn on the account of L.C., a person known to the United States Attorney, and which had been forged by Pierce.

5. On or about June 13, 2008, defendant RENILE WALKER deposited into the American Heritage Federal Credit Union account of D.K., a person known to the United States Attorney, a check in the amount of \$3,874, dated June 13, 2008, which was drawn on the account of C.W., a person known to the United States Attorney, and which had been forged by Pierce.

6. On or about June 30, 2008, defendant RENILE WALKER deposited into the Citizens Bank account of S.R., a person known to the United States Attorney, a check in the amount of \$3,684, which was drawn on the account of Q.P., a person known to the United States Attorney.

7. On or about July 1, 2008, defendant RENILE WALKER directed S.R. to withdraw \$3,000 from her account.

8. On or about November 17, 2008, defendant RENILE WALKER deposited into the Wachovia Bank account of J.G., a person known to the United States Attorney, a check in the amount of \$3,684, dated June 12, 2008, which was drawn on the closed account of defendant WALKER.

9. On or about December 15, 2008, defendant RENILE WALKER deposited into the American Heritage Federal Credit Union account of J.M., a person known to the United States Attorney, a check in the amount of \$3,100, dated December 12, 2008, which was drawn on the closed account of defendant WALKER.

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

COUNT TWO

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

1. At all times material to this indictment, Beneficial Mutual Savings Bank (“Beneficial Bank”) was a financial institution, the deposits of which were insured by the Federal Deposit Insurance Corporation (“FDIC”), certificate number 15697.

2. On or about April 23, 2008, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendant

RENILE WALKER

knowingly executed, and attempted to execute, and aided and abetted the execution of, a scheme to defraud Beneficial 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

It was part of the scheme that:

3. Vaughn Pierce, charged elsewhere, forged and then deposited and caused others, including defendant RENILE WALKER, to deposit fraudulent checks into bank accounts. These checks were written on closed accounts, were stolen, or otherwise lacked sufficient funds.

4. Persons known to the United States Attorney then withdrew cash based on the deposit of the fraudulent checks. The fraudulent checks were eventually dishonored.

Check No. 185 for \$3,684

5. On or about April 23, 2008, Vaughn Pierce deposited into the Beneficial Bank account of D.W., a person known to the United States Attorney, a check in the amount of

\$3,684, dated April 23, 2008, which was drawn on the account of T.J.K. and C.M.K., persons known to the United States Attorney, and which had been forged by Pierce.

6. On or about April 25, 2008, D.W. withdrew \$2,600 from his account with Beneficial Bank with the assistance of and at the direction of defendant RENILE WALKER.

7. On or about April 25, 2008, the check in the amount of \$3,684 that had been deposited into D.W.'s account on or about April 23, 2008, was returned to Beneficial Bank unpaid because the account belonging to T.J.K. and C.M.K. was previously closed.

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

COUNT THREE

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

1. At all times material to this indictment, American Heritage Federal Credit Union was a financial institution, the deposits of which were insured by the National Credit Union Share Insurance Fund, charter number 5621.

2. From in or about June 2008 through in or about December 2008, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendant

RENILE WALKER

knowingly executed, and attempted to execute, and aided and abetted the execution of, a scheme to defraud American Heritage Federal Credit Union, and to obtain monies owned by and under the care, custody, and control of that financial institution by means of false and fraudulent pretenses, representations, and promises.

THE SCHEME

It was part of the scheme that:

3. Paragraphs 3 and 4 of Count Two are incorporated here.

Check No. 1107 for \$3,874

4. On or about June 13, 2008, defendant RENILE WALKER deposited into the American Heritage Federal Credit Union account of D.K., a person known to the United States Attorney, a check in the amount of \$3,874, dated June 13, 2008, which was drawn on the account of C.W., a person known to the United States Attorney, and which had been forged by Vaughn Pierce.

5. From on or about June 16, 2008, through on or about June 19, 2008, D.K. made a series of withdrawals from D.K.'s accounts with American Heritage Federal Credit Union, totaling \$3,500.

6. On or about June 19, 2008, the check in the amount of \$3,874 that had been deposited into D.K.'s account on or about June 13, 2008, was returned to American Heritage Federal Credit Union unpaid due to insufficient funds.

Check No. 181 for \$3,100

7. On or about December 15, 2008, defendant RENILE WALKER deposited into the American Heritage Federal Credit Union account of J.M., a person known to the United States Attorney, a check in the amount of \$3,100, dated December 12, 2008, which was drawn on the account of defendant WALKER, which account had previously been closed.

8. On or about December 16, 2008, through on or about December 18, 2008, J.M. made a series of withdrawals from her account, totaling \$3,096.

9. On or about December 19, 2008, the check in the amount of \$3,100 that had been deposited into J.M.'s account on or about December 15, 2008, was returned unpaid because the account belonging to defendant RENILE WALKER was previously closed.

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

COUNT FOUR

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

1. At all times material to this indictment, Citizens Bank of Pennsylvania was a financial institution, the deposits of which were insured by the FDIC, certificate number 57282.

2. From in or about April 2008 through in or about October 2008, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendant

RENILE WALKER

knowingly executed, and attempted to execute, and aided and abetted the execution of, a scheme to defraud Citizens Bank of Pennsylvania, 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

It was part of the scheme that:

3. Paragraphs 3 and 4 of Count Two are incorporated here.

Check No. 173 for \$4,563

4. On or about April 7, 2008, defendant RENILE WALKER deposited into the Citizens Bank account of C.D., a person known to the United States Attorney, a check in the amount of \$4,563, dated April 7, 2008, which was drawn on the closed account of defendant WALKER, and which had been forged by Vaughn Pierce.

 5. On or about April 8, 2008, C.D. withdrew \$3,500 from his account. C.D. also made several other withdrawals and debit card transactions at or around this time.

6. On or about April 10, 2008, the check in the amount of \$4,563 that had been deposited into C.D.'s account on or about April 7, 2008, was returned unpaid because defendant RENILE WALKER's account was previously closed.

Check No. 171 for \$4,381

7. On or about April 8, 2008, defendant RENILE WALKER deposited into the Citizens Bank account of C.D., a person known to the United States Attorney, a check in the amount of \$4,381, dated April 8, 2008, which was drawn on the closed account of defendant WALKER, and which had been forged by Vaughn Pierce.

 8. On or about April 11, 2008, the check in the amount of \$4,381 that had been deposited into C.D.'s account on or about April 8, 2008, was returned unpaid because defendant RENILE WALKER's account was previously closed.

Check No. 106 for \$3,684

9. On or about June 30, 2008, defendant RENILE WALKER deposited into the Citizens Bank account of S.R., a person known to the United States Attorney, a check in the amount of \$3,684, which was drawn on the account of Q.P., a person known to the United States Attorney.

10. On or about July 1, 2008, S.R., at the direction of and with the assistance of defendant RENILE WALKER, withdrew \$3,000 from her account.

11. On or about July 3, 2008, the check in the amount of \$3,684 that had been deposited into S.R.'s account on or about June 30, 2008, was returned unpaid.

Check No. 1290 for \$3,684

12. On or about October 7, 2008, defendant RENILE WALKER deposited into the Citizens Back account of A.B., a person known to the United States Attorney, a check in the amount of \$3,684, dated October 7, 2008, which was drawn on the account of B.F., a person known to the United States Attorney.

13. On or about October 8, 2008, A.B. withdrew a total of \$3,600 from his account.

_____ 14. On or about October 9, 2008, the check in the amount of \$3,684 that had been deposited into A.B.'s account on or about October 7, 2008, was returned unpaid.

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

COUNT FIVE

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

1. At all times material to this indictment, TD Bank, N.A., was a financial institution, the deposits of which were insured by the FDIC, certificate number 18409.

2. From in or about December 2007 through in or about May 2008, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendant

RENILE WALKER

knowingly executed, and attempted to execute, and aided and abetted the execution of, a scheme to defraud TD Bank, N.A., 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

It was part of the scheme that:

3. Paragraphs 3 and 4 of Count Two are incorporated here.

Check No. 171 for \$850

4. On or about December 17, 2007, Vaughn Pierce, with the assistance of defendant RENILE WALKER, deposited into the TD Bank account of T.P, a person known to the United States Attorney, a check in the amount of \$850, dated December 17, 2007, which was drawn on the account of M.B., a person known to the United States Attorney, and which had been forged by Vaughn Pierce.

5. On or about December 20, 2007, the check in the amount of \$850 that had been deposited into T.P.'s account on or about December 17, 2007, was returned to TD Bank unpaid.

Check No. 167 for \$4,829

6. On or about March 13, 2008, defendant RENILE WALKER deposited into the TD Bank account of J.S., a person known to the United States Attorney, a check in the amount of \$4,829.00, dated March 13, 2008, which was drawn on the account of T.J., a person known to the United States Attorney, and which had been forged by Vaughn Pierce.

7. On or about March 17, 2008, the check in the amount of \$4,829.00 that had been deposited into T.J.'s account on or about March 13, 2008, was returned unpaid.

Check No. 156 for \$4,364

8. On or about April 24, 2008, defendant RENILE WALKER deposited into the TD Bank account of E.R., a person known to the United States Attorney, a check in the amount of \$4,634, dated April 24, 2008, which was drawn on the account of D.W., a person known to the United States Attorney, and which had been forged by Vaughn Pierce.

9. On or about April 25, 2008, E.R. made a series of withdrawals from her account totaling \$484.50. At or around this time, E.R. also made a series of debit card transactions totaling \$515.64.

10. On or about April 29, 2008, the check in the amount of \$4,364 that had been deposited into E.R.'s account on or about April 24, 2008, was returned unpaid.

Check No. 1138 for \$3,842

11. On or about May 30, 2008, defendant RENILE WALKER deposited into the TD Bank account of Q.P., a person known to the United States Attorney, a check in the amount of \$3,842, dated May 30, 2008, which was drawn on the account of P.W., a person known to the United States Attorney, and which had been forged by Vaughn Pierce.

12. On or about June 3, 2008, the check in the amount of \$3,842 that had been deposited into Q.P.'s account on or about May 30, 2008, was returned unpaid due to insufficient funds.

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

COUNT SIX

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

1. At all times material to this indictment, Wachovia Bank was a financial institution, the deposits of which were insured by the FDIC, certificate number 33869.

2. From in or about June 2008 through in or about November 2008, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendant

RENILE WALKER

knowingly executed, and attempted to execute, and aided and abetted the execution of, a scheme to defraud Wachovia 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

It was part of the scheme that:

3. Paragraphs 3 and 4 of Count Two are incorporated here.

Check No. 1248 for \$3,863

4. On or about June 12, 2008, defendant RENILE WALKER deposited into the Wachovia Bank account of C.W. a check in the amount of \$3,863, dated June 12, 2008, which was drawn on the account of L.C., a person known to the United States Attorney, and which had been forged by Vaughn Pierce.

5. On or about June 13, 2008, C.W. withdrew \$1,900 from his account with Wachovia Bank.

6. On or about June 14, 2008, C.W. again withdrew \$1,900 from his account with Wachovia Bank.

7. On or about June 17, 2008, the check in the amount of \$3,863 that had been deposited into C.W.'s account on or about June 12, 2008, was returned to Wachovia Bank unpaid due to the fact that the account belonging to L.C. was previously closed.

Check No. 134 for \$3,684

8. On or about November 17, 2008, defendant RENILE WALKER deposited into the Wachovia Bank account of J.G. a check in the amount of \$3,684, dated November 17, 2008, which was drawn on the closed account of defendant WALKER.

9. On or about November 21, 2008, the check in the amount of \$3,684 that had been deposited into J.G.'s account on or about November 17, 2008, was returned to Wachovia Bank unpaid due to the fact that defendant RENILE WALKER's account was previously closed.

All in violation of Title 18, United States Code, Sections 1344 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 1344, set forth in this indictment, defendant

RENILE WALKER

shall forfeit to the United States of America any property that constitutes, or is derived from, proceeds obtained directly or indirectly from the commission of such offenses, including, but not limited to, the sum of \$22,891.23.

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(s) up to the value of the property subject to forfeiture.

All pursuant to Title 18, United States Code, Section 982(a)(2).

LAURIE MAGID
United States Attorney