

3. From on or about August 1, 2007 through on or about August 7, 2008, in Philadelphia, in the Eastern District of Pennsylvania and elsewhere, defendant

LISA BRYANT NELSON

conspired and agreed, 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, Sovereign Bank, M&T Bank, and Wachovia Bank, in violation of Title 18, United States Code, Section 1344, and to knowingly and without lawful authority transfer, possess and 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. Defendant LISA BRYANT NELSON and her co-conspirators used stolen identification information to cash fraudulent checks and make fraudulent withdrawals from the victims' bank accounts.

5. Defendant LISA BRYANT NELSON, an employee of Colonial Penn Life Insurance, was recruited by Co-Conspirator 1, a person known to the grand jury, to provide him with the names, addresses, dates of birth, social security numbers, and bank names and account numbers for Colonial Penn Life Insurance customers that fit specified criteria, such as age, sex, or use of a particular bank.

6. Defendant LISA BRYANT NELSON used her position at Colonial Penn Life Insurance to improperly access computerized information for Colonial Penn Life Insurance customers, which information she provided to Co-Conspirator 1. This information included victim names, addresses, social security numbers, dates of birth, and bank account information.

7. Co-Conspirator 1 used the stolen Colonial Penn Life Insurance customer personal and bank account information to manufacture fraudulent checks and false photographic identifications in the name of those customers of Prudential Insurance, 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 bank accounts of those Colonial Penn Life Insurance customers.

8. Armed with false identification and fraudulent checks, these check-runners posed as customers of the banks to cash or attempt to cash checks made payable to those customers, or withdraw or attempt to withdraw money from those customers’ accounts, totaling an amount in excess of approximately \$157,318.

OVERT ACTS

In furtherance of the conspiracy, defendant LISA BRYANT NELSON and her co-conspirators committed the following overt acts in the Eastern District of Pennsylvania and elsewhere:

1. Between on or about August 1, 2007 and on or about August 7, 2008, defendant LISA BRYANT NELSON provided Co-Conspirator 1 with over one hundred twenty Colonial Penn Life Insurance customers’ bank account and personal information, including names, social security numbers, dates of birth, bank name, and bank account number, including the bank account and personal information for E.F., L.C., M.L., R.L., E.M., B.H., M.D., D.H., F.H., E.N., E.S., A.A., N.C., M.D.B., D.F., M.G., S.H., M.B., G.D.O, A.Y., L.B., V.C., S.B., B.W., M.C., L.C., B.B., A.E., C.G., I.D., B.J., and J.L.

2. Between on or about August 1, 2007 and on or about August 7, 2008, Co-Conspirator 1 manufactured fraudulent checks and driver's licenses, using the account and personal information that he had received from defendant LISA BRYANT NELSON and then provided those fraudulent documents to other individuals involved in the scheme.

3. Between on or about August 1, 2007 and on or about August 7, 2008, in an effort to cash checks and make withdrawals, and using the fraudulent documents manufactured by Co-Conspirator 1 in the bank customers' names provided by defendant LISA BRYANT NELSON, other individuals involved in the scheme acquired or attempted to acquire approximately \$157,318 from Citizens Bank, M&T Bank, and Wachovia Bank by presenting to tellers of these banks fraudulent identification, checks and withdrawal slips in the names of E.F., L.C., M.L., R.L., E.M., B.H., M.D., D.H., F.H., E.N., E.S., A.A., N.C., M.D.B., D.F., M.G., S.H., M.B., G.D.O, A.Y., L.B., V.C., S.B., B.W., M.C., L.C., B.B., A.E., C.G., I.D., B.J., and J.L.

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

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

At all times material to this indictment:

1. Paragraphs 1, 2 and 4 through 8 and Overt Acts 1 through 3 of Count One are realleged here.

2. From on or about August 1, 2007 to on or about August 7, 2008, in the Eastern District of Pennsylvania, and elsewhere, defendant

LISA BRYANT NELSON

knowingly executed, and 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 Citizens Bank by means of materially false and fraudulent pretenses, representations and promises.

THE SCHEME

It was part of the scheme that:

3. Between on or about August 1, 2007, and on or about August 7, 2008, defendant LISA BRYANT NELSON used her position at Colonial Penn Life Insurance to improperly acquire personal and account information for Citizens Bank customers belonging to E.F., L.C., M.L., R.L., E.M., B.H., M.D., D.H., F.H., E.N., and E.S.

4. Defendant LISA BRYANT NELSON then provided that personal and account information to Co-Conspirator 1 who used the stolen account information in the manufacture of false identification documents and the cashing of fraudulent checks or making of fraudulent withdrawals to acquire or attempt to acquire approximately \$40,083 from Citizens

Bank by cashing fraudulent checks on accounts belonging to E.F., L.C., M.L., R.L., E.M., B.H., M.D., D.H., F.H., E.N., and E.S.

5. In furtherance of the scheme, other individuals cashed and attempted to cash the following counterfeit checks and made the following fraudulent withdrawals:

<u>DATE</u>	<u>LOCATION</u>	<u>VICTIM ACCOUNT HOLDER</u>	<u>AMOUNT</u>
02/01/08	Kingston, PA	E.F.	\$4,008
03/21/08	Rummemedede, PA	L.C.	\$2,050
04/10/08	West Goshen, PA	M.L.	\$2,575
05/21/08	West Goshen, PA	R.L.	\$2,550
05/23/08	Newtown Square, PA	E.M.	\$2,350
05/25/08	Newtown Square, PA	B.H.	\$3,450 attempt
06/14/08	Center Square, PA	M.D.	\$2,550 attempt
07/25/08	Delaware	D.H.	\$6,500
07/28/08	Delaware	F.H.	\$4,000 attempt
08/07/08	New York	E.N.	\$6,250
08/07/08	New York	E.S.	\$4,100 attempt

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

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

At all times material to this indictment:

1. Paragraphs 1, 2 and 4 through 8 and Overt Acts 1 through 3 of Count One are realleged here.

2. From on or about August 1, 2007 to on or about August 7, 2008, in the Eastern District of Pennsylvania, and elsewhere, defendant

LISA BRYANT NELSON

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

THE SCHEME

It was part of the scheme that:

3. Between on or about August 1, 2007, and on or about April 4, 2008, defendant LISA BRYANT NELSON used her position at Colonial Penn Life Insurance to improperly acquire personal and account information for M&T Bank customers belonging to A.A., N.C., M.D.B., D.F., M.G., S.H., and M.B.

4. Defendant LISA BRYANT NELSON then provided that personal and account information to Co-Conspirator 1, who used the stolen account information in the manufacture of false identification documents and the cashing of fraudulent checks or the making of fraudulent withdrawals to acquire or attempt to acquire approximately \$43,500 from M&T Bank by cashing fraudulent checks or making fraudulent withdrawals on accounts belonging to

A.A., N.C., M.D.B., D.F., M.G., S.H., and M.B.

5. In furtherance of the scheme, other persons cashed the following counterfeit checks and made the following fraudulent withdrawals:

<u>DATE</u>	<u>LOCATION</u>	<u>VICTIM ACCOUNT HOLDER</u>	<u>AMOUNT</u>
12/19/07	Maryland	A.A.	\$5,665
12/21/07	Maryland	A.A.	\$4,105
12/19/07	Maryland	N.C.	\$4,410
12/19/07	Maryland	M.D.B.	\$2,750
2/13/08	Maryland	D.F.	\$5,600
2/14/08	Maryland	D.F.	\$5,760
2/15/08	Maryland	D.F.	\$4,005
2/21/08	Maryland	M.G.	\$6,005
2/27/08	Maryland	S.H.	\$2,750
4/04/08	Maryland	M.B.	\$2,450

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

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

At all times material to this indictment:

1. Paragraphs 1, 2 and 4 through 8 and Overt Acts 1 through 3 of Count One are realleged here.

2. From on or about August 1, 2007 to on or about May 6, 2008, in the Eastern District of Pennsylvania, and elsewhere, defendant

LISA BRYANT NELSON

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 Wachovia Bank by means of materially false and fraudulent pretenses, representations and promises.

THE SCHEME

It was part of the scheme that:

3. Between on or about August 1, 2007, and on or about August 7, 2008, defendant LISA BRYANT NELSON used her position at Colonial Penn Life Insurance to improperly acquire personal and account information for Wachovia Bank customers belonging to G.D.O, A.Y., L.B., V.C., S.B., B.W., M.C., L.C., B.B., A.E., C.G., I.D., B.J., and J.L.

4. Defendant LISA BRYANT NELSON then provided that personal and account information to Co-Conspirator 1, who used the stolen account information in the manufacture of false identification documents and the cashing of fraudulent checks or the making of fraudulent withdrawals to acquire or attempt to acquire approximately \$73,735 from

Wachovia Bank by cashing fraudulent checks or making fraudulent withdrawals on accounts belonging to G.D.O, A.Y., L.B., V.C., S.B., B.W., M.C., L.C., B.B., A.E., C.G., I.D., B.J., and J.L.

5. In furtherance of the scheme, other persons cashed the following fraudulent checks or made the following fraudulent withdrawals:

<u>DATE</u>	<u>LOCATION</u>	<u>VICTIM ACCOUNT HOLDER</u>	<u>AMOUNT</u>
09/21/07	Maryland	G.D.O.	\$5,525
09/22/07	Maryland	G.D.O.	\$3,900
09/28/07	Maryland	G.D.O.	\$5,500
10/02/07	Maryland	G.D.O.	\$2,250
10/15/07	Maryland	A.Y.	\$5,475
10/15/07	Maryland	A.Y.	\$5,450
10/16/07	Maryland	L.B.	\$2,275
10/26/07	Maryland	V.C.	\$6,635
12/04/07	Maryland	S.B.	\$5,110
12/19/07	Maryland	B.W.	\$1,975
12/21/07	Maryland	M.C.	\$5,830
1/03/08	Maryland	L.C.	\$6,010
1/04/08	Maryland	L.C.	\$1,700
1/04/08	Maryland	B.B.	\$1,700
1/15/08	Maryland	A.E.	\$4,000
2/21/08	Maryland	C.G.	\$1,700

3/06/08	Maryland	I.D.	\$1,700 attempt
3/24/08	Maryland	B.J.	\$4,000
5/06/08	Maryland	J.L.	\$3,000

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

COUNTS FIVE THROUGH THIRTEEN

THE GRAND JURY FURTHER CHARGES THAT:

From on or about August 1, 2007 to on or about August 7, 2008, in the Eastern District of Pennsylvania and elsewhere, defendant

LISA BRYANT NELSON

knowingly and without lawful authority, transferred, and aided and abetted the transfer, possession and use of, a means of identification of another person, that is, the use of the name and personal identifying information of the persons indicated below, each person constituting a separate count, during and in relation to bank fraud.

<u>COUNT</u>	<u>DATE</u>	<u>ACCOUNT HOLDER</u>	<u>BANK</u>
5	10/15/07	A.Y.	Wachovia Bank
6	10/26/07	V.C.	Wachovia Bank
7	12/19/07	B.W.	Wachovia Bank
8	12/21/07	M.C.	Wachovia Bank
9	02/01/08	E.F.	Citizens Bank
10	03/21/08	L.C.	Citizens Bank
11	05/23/08	B.H.	Citizens Bank
12	08/07/08	E.N.	Citizens Bank
13	08/07/08	E.S.	Citizens Bank

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

COUNT FOURTEEN

THE GRAND JURY FURTHER CHARGES THAT:

From on or about August 1, 2007 to on or about August 7, 2008, in the Eastern District of Pennsylvania, defendant

LISA BRYANT NELSON

knowingly, and without authorization or in excess of authorized access, obtained information from a protected computer and such conduct involved an interstate communication.

In violation of Title 18, United States Code, Section 1030(a)(2)(C).

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

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

LISA BRYANT NELSON

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 \$141,818.

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:

GRAND JURY FOREPERSON



LAURIE MAGID
UNITED STATES ATTORNEY