

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

UNITED STATES OF AMERICA	:	CRIMINAL NO. <u>10-395</u>
v.	:	DATE FILED: <u>August 12, 2010</u>
YUSEF DAVIS,	:	VIOLATIONS:
CHARLES BERNHARDT,	:	18 U.S.C. § 371 (conspiracy to deal in counterfeit
a/k/a "Chuck,"	:	currency - 1 count)
GARLAND CRUMP,	:	18 U.S.C. § 473 (dealing in counterfeit currency -
a/k/a "Anwar"	:	2 counts)
	:	18 U.S.C. § 472 (possession of counterfeit
	:	currency- 3 counts)
	:	Notice of forfeiture

SUPERSEDING INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

1. From on or about March 25, 2010, to on or about May 19, 2010, in the Eastern District of Pennsylvania and elsewhere, defendants

**YUSEF DAVIS,
CHARLES BERNHARDT,
a/k/a "Chuck,"
and
GARLAND CRUMP,
a/k/a "Anwar,"**

conspired and agreed, together and with others unknown to the grand jury, to commit an offense against the United States, that is, to possess, pass, sell, exchange, transfer, and deliver, falsely made, forged and counterfeited obligations of the United States, that is, counterfeit \$100 United States Federal Reserve Notes, with the intent that the same be passed, published, and used as true as genuine, in violation of Title 18, United States Code, Sections 472 and 473.

MANNER AND MEANS

2. It was part of the conspiracy that defendants YUSEF DAVIS, CHARLES BERNHARDT, and GARLAND CRUMP obtained counterfeit \$100 United States Federal Reserve Notes.

It was further a part of the conspiracy that:

3. Defendants YUSEF DAVIS, CHARLES BERNHARDT, and GARLAND CRUMP sold this counterfeit currency in return for genuine currency.

OVERT ACTS

In furtherance of the conspiracy, defendants YUSEF DAVIS, CHARLES BERNHARDT, and GARLAND CRUMP, and others unknown to the grand jury, committed the following overt acts in the Eastern District of Pennsylvania and elsewhere:

1. On or about March 25, 2010, defendant GARLAND CRUMP agreed to sell \$5,000 in counterfeit \$100 Federal Reserve Notes to Person #1, an individual known to the Grand Jury, for \$2,000 in genuine currency.

2. On or about March 26, 2010, defendants GARLAND CRUMP and CHARLES BERNHARDT sold \$4,800 in counterfeit \$100 Federal Reserve Notes for \$2,000 in genuine currency to Person #1. Defendant CRUMP told Person #1 that he would “get him back later” for shorting him \$200 in counterfeit \$100 bills.

3. On or about May 6, 2010, defendant CHARLES BERNHARDT agreed to sell \$5,000 in counterfeit \$100 Federal Reserve Notes to Person #1 for \$2,000 in genuine currency.

4. On or about May 11, 2010, defendant CHARLES BERNHARDT entered

the residence of defendant YUSEF DAVIS on North 44th Street. A few minutes later, defendant BERNHARDT left the residence of defendant DAVIS and met with Person #1 at 44th Street and Wallace Street, a nearby corner. Defendant BERNHARDT sold \$5,200 in counterfeit \$100 Federal Reserve Notes to Person #1 for \$2,000 in genuine currency. Defendant BERNHARDT provided the additional two counterfeit \$100 Federal Reserve Notes to make up for the \$200 that defendant CRUMP shorted Person #1 from the transaction on or about March 26, 2010.

5. On or about May 18, 2010, defendant CHARLES BERNHARDT agreed to sell \$10,000 in counterfeit \$100 Federal Reserve Notes to Person #1. Defendant BERNHARDT agreed to meet Person #1 near 44th Street and Wallace Street in Philadelphia to complete the transaction.

6. On or about May 19, 2010, defendants CHARLES BERNHARDT and YUSEF DAVIS walked together to meet with Person #1 in the area of 44th Street and Wallace Street in Philadelphia.

7. On or about May 19, 2010, defendant YUSEF DAVIS possessed five counterfeit \$20 Federal Reserve Notes and 20 counterfeit \$100 Federal Reserve Notes.

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

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 26, 2010, in Philadelphia, in the Eastern District of
Pennsylvania, defendants

**YUSEF DAVIS,
CHARLES BERNHARDT,
a/k/a “Chuck,”
and
GARLAND CRUMP,
a/k/a “Anwar,”**

knowingly sold, transferred, and delivered, and aided and abetted the sale, transfer and delivery
of, counterfeit obligations of the United States, that is, approximately \$4800 in counterfeit \$100
Federal Reserve Notes, with the intent that the counterfeit \$100 Federal Reserve Notes be passed,
published, and used as true and genuine.

In violation of Title 18, United States Code, Sections 473 and Section 2.

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 26, 2010, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**YUSEF DAVIS,
CHARLES BERNHARDT,
a/k/a “Chuck,”
and
GARLAND CRUMP,
a/k/a “Anwar,”**

with intent to defraud, possessed and concealed, and aided and abetted the possession and concealment of, falsely made, forged, and counterfeited obligations of the United States, that is, approximately \$4800 in counterfeit \$100 Federal Reserve Notes.

In violation of Title 18, United States Code, Sections 472 and 2.

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about May 11, 2010, in Philadelphia, in the Eastern District of
Pennsylvania, defendants

**YUSEF DAVIS
and
CHARLES BERNHARDT,
a/k/a “Chuck,”**

knowingly sold, transferred, and delivered, and aided and abetted the sale, transfer and delivery
of, counterfeit obligations of the United States, that is, approximately \$5200 in counterfeit \$100
Federal Reserve Notes, with the intent that the counterfeit \$100 Federal Reserve Notes be passed,
published, and used as true and genuine.

In violation of Title 18, United States Code, Sections 473 and Section 2.

COUNT FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about May 11, 2010, in Philadelphia, in the Eastern District of
Pennsylvania, defendants

**YUSEF DAVIS
and
CHARLES BERNHARDT,
a/k/a “Chuck,”**

with intent to defraud, possessed and concealed, and aided and abetted the possession and concealment of, falsely made, forged, and counterfeited obligations of the United States, that is, approximately \$5200 in counterfeit \$100 Federal Reserve Notes.

In violation of Title 18, United States Code, Sections 472 and 2.

COUNT SIX

THE GRAND JURY FURTHER CHARGES THAT:

On or about May 19, 2010, in Philadelphia, in the Eastern District of
Pennsylvania, defendant

YUSEF DAVIS,

with intent to defraud, possessed and concealed falsely made, forged, and counterfeited
obligations of the United States, that is, approximately \$100 in counterfeit \$20 Federal Reserve
Notes and approximately \$2,000 in counterfeit \$100 Federal Reserve Notes.

In violation of Title 18, United States Code, Section 472.

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 473 set forth in this indictment, defendants

**YUSEF DAVIS,
CHARLES BERNHARDT,
a/k/a “Chuck,”
and
GARLAND CRUMP,
a/k/a “Anwar,**

shall forfeit to the United States of America any and all property that constitutes or is derived, directly or indirectly, from gross proceeds traceable to the commission of the offenses, including, but not limited to, \$4,000 in currency, any property involved in such offenses, and any property traceable to such property.

2. If any of the property subject to forfeiture, as a result of any act or omission of the defendants:

- (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 defendants up to the value of the property subject to forfeiture.

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

A TRUE BILL:

GRAND JURY FOREPERSON

ZANE DAVID MEMEGER
United States Attorney