

**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>RODNEY HOLLOMAN,</b>	<b>:</b>	<b>VIOLATIONS:</b>
a/k/a "Q,"		
a/k/a "Storm,"	<b>:</b>	<b>18 U.S.C. § 371 (conspiracy - 1 count)</b>
a/k/a "The Muslim Guy,"	<b>:</b>	<b>18 U.S.C. § 1344 (bank fraud - 1 count)</b>
<b>JOHN DAVIS,</b>	<b>:</b>	<b>18 U.S.C. § 1028A (aggravated identity</b>
a/k/a "John Jones,"		<b>theft - 6 counts)</b>
a/k/a "John Washington"	<b>:</b>	<b>18 U.S.C. § 2 (aiding and abetting)</b>
<b>YOLANDA E. LOWERY,</b>		<b>Notice of forfeiture</b>
<b>ANTHONY KEVIN MANIS,</b>	<b>:</b>	
a/k/a "Tone,"		
<b>JANET FERGUSON</b>		

**INDICTMENT**

**COUNT ONE**

**THE GRAND JURY CHARGES THAT:**

At all times material to this indictment:

1. Willow Financial Bank was a financial institution, the deposits of which were insured by the Federal Deposit Insurance Corporation, certificate number 30089.
2. Bank of America was a financial institution, the deposits of which were insured by the Federal Deposit Insurance Corporation, certificate number 3510.
3. Willow Financial Bank and Bank of America maintained policies permitting their customers, after completing a withdrawal slip containing their account numbers, to withdraw funds from their accounts at a teller's window inside a branch of the banks.

4. From in or about June 2008 or earlier, through at least June 2009, in the Eastern District of Pennsylvania, defendants

**RODNEY HOLLOMAN,  
a/k/a "Q,"  
a/k/a "Storm,"  
a/k/a "The Muslim Guy,"  
JOHN DAVIS,  
a/k/a "John Jones,"  
a/k/a "John Washington"  
YOLANDA E. LOWERY,  
ANTHONY KEVIN MANIS,  
a/k/a "Tone," and  
JANET FERGUSON**

conspired and agreed, together with Mechele Anderson, a person known to the grand jury and charged elsewhere, and with others unknown to the grand jury, to commit offenses against the United States, that is, to knowingly execute, attempt to execute, and aid and abet the execution of, a bank fraud, in violation of Title 18, United States Code, Sections 1344 and 2, and to knowingly and without lawful authority use a means of identification of another person during and in relation to a bank fraud scheme, in violation of Title 18, United States Code, Sections 1028A(a)(1), (c)(5) and 2.

#### **MANNER AND MEANS**

5. It was part of the conspiracy that defendants RODNEY HOLLOMAN, a/k/a "Q," a/k/a "Storm," a/k/a "The Muslim Guy," JOHN DAVIS, a/k/a "John Jones," a/k/a "John Washington," YOLANDA E. LOWERY, ANTHONY KEVIN MANIS, a/k/a "Tone," and JANET FERGUSON, together with Mechele Anderson, charged elsewhere, and others unknown to the grand jury, used the names, dates of birth, addresses, social security numbers, bank account numbers and other means of identification of customers of Willow Financial Bank

and Bank of America (collectively referred to as “the banks”) to enrich themselves and defraud the banks by posing as customers of the banks at branches of the banks and withdrawing funds from the customers’ accounts.

It was further a part of the conspiracy that:

6. Defendant RODNEY HOLLOMAN was the leader of a scheme in which a bank employee and others were recruited to provide personal identifying information and account numbers of customers of the banks. Other individuals, known as “check runners” were recruited to pose as bank customers and withdraw funds from the customers’ accounts. In his capacity as leader of the scheme, defendant HOLLOMAN performed the following, among other things:

a. he successfully convinced a bank employee, defendant YOLANDA E. LOWERY, to provide him with confidential bank information, including customers account numbers and account balances, and personal identifying information, including names, addresses, dates of birth, social security numbers, and driver’s license numbers;

b. he recruited another person, defendant JOHN DAVIS, who is the brother of defendant YOLANDA E. LOWERY, to convince defendant LOWERY to provide confidential bank information for use in the bank fraud scheme;

c. he arranged with others, including defendants JOHN DAVIS and ANTHONY KEVIN MANIS, to recruit “check runners” to pose as bank customers and withdraw funds from customer accounts.

d. he arranged to have photographs taken of the check runners for use on fraudulent driver’s licenses, and then arranged for the manufacture of fraudulent driver’s licenses with a check runner’s photograph and a bank customer’s name, address, and date of

birth;

e. he provided check runners with bank customers' account information and false photographic identification in the name of the bank customers;

f. he instructed check runners to withdraw funds from the customers' bank accounts at branches of the bank;

g. he accompanied check runners to and from bank branches to conduct the fraudulent transactions;

h. he maintained contact with defendant YOLANDA LOWERY via cellular telephone to check customer account information on days when check runners went into the bank branches; and

i. he paid check runners for their services after they made the unauthorized withdrawals.

7. Defendant JOHN DAVIS assisted defendant RODNEY HOLLOMAN by recruiting others to participate in the scheme, including a bank employee and a check runner, and by obtaining bank customers' account information.

8. Defendant YOLANDA E. LOWERY participated in the scheme by using her position as an employee at Willow Financial to obtain and provide customer account and identity information to defendants RODNEY HOLLOMAN and JOHN DAVIS for use in the scheme. In that capacity, defendant LOWERY performed the following, among other things:

a. she obtained customer account and identity information by accessing Willow Financial Bank's electronic records;

b. she provided customer account and identity information, including

printouts of electronic records from Willow Financial Bank, to defendants RODNEY HOLLOMAN and JOHN DAVIS; and

c. she verified customer account information, including account balances, for defendant RODNEY HOLLOMAN on dates when check runners withdrew funds from customers' accounts.

9. Defendant ANTHONY KEVIN MANIS was a "middle man" for defendant RODNEY HOLLOMAN in this scheme. In that capacity, defendant MANIS performed the following, among other things:

- a. he recruited a check runner to participate in the scheme;
- b. he accompanied a check runner to have photographs taken for use on fraudulent driver's licenses; and
- c. he arranged transportation for, and accompanied, a check runner to and from branches of the banks to conduct the fraudulent transactions.

10. Defendant JANET FERGUSON, Mechele Anderson, charged elsewhere, and a person unknown to the grand jury, were some of the check runners who participated in the scheme.

### **OVERT ACTS**

In furtherance of the conspiracy, defendants RODNEY HOLLOMAN, a/k/a "Q," a/k/a "Storm," a/k/a "The Muslim Guy," JOHN DAVIS, a/k/a "John Jones," a/k/a "John Washington," YOLANDA E. LOWERY, ANTHONY KEVIN MANIS, a/k/a "Tone," and JANET FERGUSON, together with Mechele Anderson, charged elsewhere, and others unknown to the grand jury, committed the following overt acts in the Eastern District of

Pennsylvania:

1. On or about June 1, 2008, defendant JOHN DAVIS met with defendant YOLANDA E. LOWERY and asked her to use her employment position at Willow Financial Bank to obtain customers' account information.

2. On or about June 3, 2008, defendant YOLANDA E. LOWERY, using her position at Willow Financial Bank, accessed the bank account and customer information for customers K.H. and D.H., and passed that information onto defendant JOHN DAVIS, who, in turn, provided that information to defendant RODNEY HOLLOMAN.

3. From on or about June 5, 2008 to on or about June 6, 2008, at the direction of defendant RODNEY HOLLOMAN, Mechele Anderson, charged elsewhere, posed as Willow Financial Bank customer K.H. and made and attempted to make fraudulent withdrawals totaling approximately \$24,000 from customer K.H.'s account at three Willow Financial Bank branches within the Eastern District of Pennsylvania.

4. On or about June 6, 2008, at the direction of defendant RODNEY HOLLOMAN, a person unknown to the grand jury posed as Willow Financial Bank customer D.H., whose account information was previously obtained by defendant YOLANDA E. LOWERY, and attempted to make a fraudulent withdrawal totaling approximately \$6,000 from customer D.H.'s account at a Willow Financial Bank branch within the Eastern District of Pennsylvania.

5. In or about June 2008, defendant ANTHONY KEVIN MANIS met with defendant JANET FERGUSON and recruited her to be a check runner in the bank fraud scheme.

6. On or about June 19, 2008

a. Defendant ANTHONY KEVIN MANIS drove defendant JANET FERGUSON to meet with defendant RODNEY HOLLOMAN.

b. Defendant RODNEY HOLLOMAN obtained a photograph of defendant JANET FERGUSON and then caused the production of approximately four fraudulent driver's licenses, which he then provided to defendant FERGUSON.

7. From on or about June 16, 2008 to on or about June 20, 2008, defendant YOLANDA E. LOWERY, using her position at Willow Financial Bank, accessed the bank account and customer information for customers A.E., L.W., S.B. and G.H., and provided that information to defendant RODNEY HOLLOMAN for use in the bank fraud scheme.

8. From on or about June 19, 2008 to on or about June 20, 2008, at the direction of defendant RODNEY HOLLOMAN, defendant JANET FERGUSON posed as Willow Financial Bank customers A.E., L.W., S.B., and G.H., and made and attempted to make fraudulent withdrawals from their customer accounts totaling approximately \$43,500 at five Willow Financial Bank branches within the Eastern District of Pennsylvania.

9. From on or about June 19, 2008 to on or about June 20, 2008, defendant ANTHONY KEVIN MANIS drove defendant JANET FERGUSON to various branches of Willow Financial Bank within the Eastern District of Pennsylvania in furtherance of the bank fraud scheme.

10. On or about August 11, 2008, defendant ANTHONY KEVIN MANIS had a telephone conversation with defendant JANET FERGUSON and discussed conducting additional bank fraud.

11. On or about February 12, 2009, defendant ANTHONY KEVIN MANIS

met with defendant JANET FERGUSON and obtained a passport photograph of defendant FERGUSON for the purpose of creating fraudulent identification.

12. From on or about February 12, 2009 to on or about February 18, 2009, defendant ANTHONY KEVIN MANIS provided the passport photograph of defendant JANET FERGUSON to a person unknown to the grand jury, who created a fraudulent driver's license and a fraudulent credit card in the name of Bank of America customer E.D., and, in turn, provided the fraudulent identification documents to defendant MANIS.

13. On or about February 18, 2009, defendant ANTHONY KEVIN MANIS provided fraudulent identification documents in the name of Bank of America customer E.D. to defendant JANET FERGUSON, drove defendant FERGUSON to a Bank of America branch located at 932 Chestnut Street, Philadelphia, Pennsylvania, and instructed defendant FERGUSON to enter the branch and conduct a fraudulent financial transaction in the account of Bank of America customer E.D.

14. From on or about April 29, 2009 to on or about June 24, 2009, defendant RODNEY HOLLOMAN had telephone conversations with defendant ANTHONY KEVIN MANIS, during which they discussed the production of fraudulent identification documents and plans to commit additional bank fraud.

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

**COUNT TWO**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. Paragraphs 1, 3, and 5 through 10, and Overt Acts 1 through 9 of Count One are incorporated here.

2. From on or about June 1, 2008, through on or about June 20, 2008, in the Eastern District of Pennsylvania, defendants

**RODNEY HOLLOMAN,  
a/k/a "Q,"  
a/k/a "Storm,"  
a/k/a "The Muslim Guy,"  
JOHN DAVIS,  
a/k/a "John Jones,"  
a/k/a "John Washington"  
YOLANDA E. LOWERY,  
ANTHONY KEVIN MANIS,  
a/k/a "Tone," and  
JANET FERGUSON,**

together with Mechele Anderson, charged elsewhere, and a person unknown to the grand jury, knowingly executed, attempted to execute, and aided and abetted the execution of, a scheme to defraud Willow Financial 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. As described in Count One, the defendants named above withdrew, and attempted to withdraw, money from Willow Financial Bank customers' accounts as described below:

<u>DATE</u>	<u>TIME</u>	<u>CHECK RUNNER</u>	<u>VICTIM</u>	<u>AMOUNT</u>
6/5/08	3:07 p.m.	Mechele Anderson	K.H.	\$6,000 withdrawal
6/5/08	4:05 p.m.	Mechele Anderson	K.H.	\$4,000 attempted withdrawal
6/5/08	4:59 p.m.	Mechele Anderson	K.H.	\$6,500 withdrawal
6/6/08	12:01 p.m.	Unknown Male	D.H.	\$6,000 attempted withdrawal
6/6/08	1:45 p.m.	Mechele Anderson	K.H.	\$7,500 attempted withdrawal
6/19/08	3:06 p.m.	Janet Ferguson	A.E.	\$6,000 withdrawal
6/19/08	3:40 p.m.	Janet Ferguson	A.E.	\$6,500 withdrawal
6/19/08	4:30 p.m.	Janet Ferguson	L.W.	\$6,000 withdrawal
6/20/08	1:00 p.m.	Janet Ferguson	S.B.	\$8,000 withdrawal
6/20/08	2:36 p.m.	Janet Ferguson	G.H.	\$9,000 withdrawal
6/20/08	5:11 p.m.	Janet Ferguson	A.E.	\$8,000 withdrawal

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 June 5, 2008, to on or about June 6, 2008, in the Eastern District of Pennsylvania, defendants

**RODNEY HOLLOMAN,  
a/k/a "Q,"  
a/k/a "Storm,"  
a/k/a "The Muslim Guy,"  
JOHN DAVIS,  
a/k/a "John Jones,"  
a/k/a "John Washington," and  
YOLANDA E. LOWERY,**

and Mechele Anderson, charged elsewhere, 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 K.H., a person known to the grand jury, 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 June 6, 2008, in the Eastern District of Pennsylvania, defendants

**RODNEY HOLLOMAN,  
a/k/a "Q,"  
a/k/a "Storm,"  
a/k/a "The Muslim Guy,"  
JOHN DAVIS,  
a/k/a "John Jones,"  
a/k/a "John Washington," and  
YOLANDA E. LOWERY,**

and a person unknown to the grand jury, 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 D.H., a person known to the grand jury, 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 June 19, 2008, in the Eastern District of Pennsylvania, defendants

**RODNEY HOLLOMAN,  
a/k/a "Q,"  
a/k/a "Storm,"  
a/k/a "The Muslim Guy,"  
JOHN DAVIS,  
a/k/a "John Jones,"  
a/k/a "John Washington"  
YOLANDA E. LOWERY,  
ANTHONY KEVIN MANIS,  
a/k/a "Tone," and  
JANET FERGUSON,**

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 L.W., a person known to the grand jury, 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:**

From on or about June 19, 2008, to on or about June 20, 2008, in the Eastern District of Pennsylvania, defendants

**RODNEY HOLLOMAN,  
a/k/a "Q,"  
a/k/a "Storm,"  
a/k/a "The Muslim Guy,"  
JOHN DAVIS,  
a/k/a "John Jones,"  
a/k/a "John Washington"  
YOLANDA E. LOWERY,  
ANTHONY KEVIN MANIS,  
a/k/a "Tone," and  
JANET FERGUSON,**

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 A.E., a person known to the grand jury, 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:**

On or about June 20, 2008, in the Eastern District of Pennsylvania, defendants

**RODNEY HOLLOMAN,  
a/k/a "Q,"  
a/k/a "Storm,"  
a/k/a "The Muslim Guy,"  
JOHN DAVIS,  
a/k/a "John Jones,"  
a/k/a "John Washington"  
YOLANDA E. LOWERY,  
ANTHONY KEVIN MANIS,  
a/k/a "Tone," and  
JANET FERGUSON,**

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 S.B., a person known to the grand jury, during and in relation to bank fraud.

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

**COUNT EIGHT**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about June 20, 2008, in the Eastern District of Pennsylvania, defendants

**RODNEY HOLLOMAN,  
a/k/a "Q,"  
a/k/a "Storm,"  
a/k/a "The Muslim Guy,"  
JOHN DAVIS,  
a/k/a "John Jones,"  
a/k/a "John Washington"  
YOLANDA E. LOWERY,  
ANTHONY KEVIN MANIS,  
a/k/a "Tone," and  
JANET FERGUSON,**

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 G.H., a person known to the grand jury, during and in relation to bank fraud.

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

## NOTICE OF FORFEITURE

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

**RODNEY HOLLOMAN,**  
a/k/a "Q,"  
a/k/a "Storm,"  
a/k/a "The Muslim Guy,"  
**JOHN DAVIS,**  
a/k/a "John Jones,"  
a/k/a "John Washington"  
**YOLANDA E. LOWERY,**  
**ANTHONY KEVIN MANIS,**  
a/k/a "Tone," and  
**JANET FERGUSON**

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 \$48,000.

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

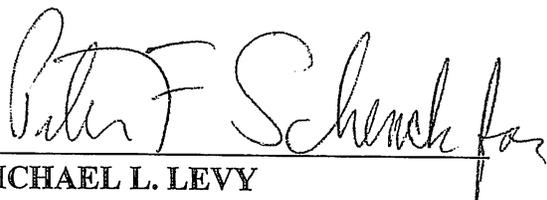
property of the defendant up to the value of the property subject to forfeiture.

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

**A TRUE BILL:**

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**GRAND JURY FOREPERSON**

A handwritten signature in cursive script that reads "Peter F. Schenk for". The signature is written in black ink and is positioned above a horizontal line.

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**MICHAEL L. LEVY**  
**United States Attorney**