

Filed Under Seal

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

UNITED STATES OF AMERICA	:	CRIMINAL NO. <u>10-147</u>
v.	:	DATE FILED: August 26, 2010
ANDRE DAVIS, a/k/a "Dre," a/k/a "Murder,"	:	VIOLATIONS: 18 U.S.C. § 371 (conspiracy to commit bank fraud and aggravated identity theft - 1 count)
MIKE KNOX	:	18 U.S.C. § 1344 (bank fraud - 4 counts)
LATASHA SNEAD, a/k/a "Tasha,"	:	18 U.S.C. § 1028A (aggravated identity theft - 35 counts)
TALAYAH LITTLE	:	18 U.S.C. § 2 (aiding and abetting)
KEITH ENNIS	:	Notice of forfeiture

**SUPERSEDING INDICTMENT**

**COUNT ONE**

**THE GRAND JURY CHARGES THAT:**

At times material to this superseding indictment:

1. The following banks were financial institutions, insured by the Federal Deposit Corporation:
  - a) TD Bank, certificate numbers 21140 and 18409;
  - b) Citizens Bank, certificate numbers 57282 and 57957;
  - c) Wachovia Bank, certificate number 33869; and
  - d) PNC Bank, certificate number 6384.

2. From on or about October 21, 2005, through on or about May 13, 2010, in Philadelphia, in the Eastern District of Pennsylvania and elsewhere, defendants

**ANDRE DAVIS,  
a/k/a "Dre,"  
a/k/a "Murder,"  
MIKE KNOX,  
LATASHA SNEAD,  
a/k/a "Tasha,"  
TALAYAH LITTLE, and  
KEITH ENNIS**

conspired and agreed, together and with others known and 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) and 2.

**MANNER AND MEANS**

It was part of the conspiracy that:

3. Defendants, ANDRE DAVIS, MIKE KNOX, LATASHA SNEAD, TALAYAH LITTLE, and KEITH ENNIS, and others known and unknown to the grand jury, used the names, dates of births, addresses, social security numbers, bank account numbers, and other means of identification of customers of TD Bank, Citizens Bank, Wachovia Bank, and PNC Bank to enrich themselves and to defraud the banks by using other persons known and unknown to the grand jury to pose as customers of the banks at branches of the banks and to cash fraudulent checks and fraudulently withdraw funds from the customers' accounts.

**ROLE OF DEFENDANT ANDRE DAVIS**

4. Defendant ANDRE DAVIS was the ringleader of a scheme in which bank employees and others were recruited to provide personal identifying information and account numbers of bank customers to fraudulently obtain cash from accounts controlled by the bank customers. Other individuals, known as “check runners,” were recruited to pose as bank customers and to cash fraudulent checks and fraudulently withdraw funds from the customers’ accounts. In his capacity as ringleader, defendant DAVIS performed the following, among other things:

a. he successfully convinced bank employees, by pursuing romantic and friendship relationships with them, 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 used others to recruit bank employees to provide bank customers’ account information and to recruit check runners;

c. he verified account balances and activity in the bank customers’ accounts by calling the banks’ automated banking numbers;

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 "cheat-sheets" on which was printed information, such as a bank customer's account number and other types of identifying information;

f. he provided check runners with bank customers' account information, false photographic identification in the name of the bank customers, and fraudulent checks payable to the bank customers;

g. he instructed check runners to present the fraudulent checks for payment or deposit against, and withdraw funds from, the customers' bank accounts at branches of the banks;

h. he decided at which branches of the banks that the check runners would cash fraudulent checks and make fraudulent withdrawals;

i. he arranged transportation for, and many times accompanied, defendant MIKE KNOX and the check runners to and from branches of the banks to conduct the fraudulent transactions;

j. he maintained contact with check runners via cellular phone while the check runners were in the branches of the banks;

k. he received the proceeds from the check runners after transactions at the banks; and

l. he paid the check runners for their services after they made the fraudulent transactions.

**ROLE OF DEFENDANT MIKE KNOX**

5. Defendant MIKE KNOX was a “right hand man” of defendant ANDRE DAVIS in this scheme and performed the following, among other things:
- a. he recruited check runners;
  - b. he accompanied check runners to have photographs taken for use on fraudulent driver’s licenses;
  - c. he arranged transportation for, and many times accompanied, check runners to and from branches of the banks to conduct the fraudulent transactions;
  - d. he received some of the proceeds from the fraudulent transactions;
- and
- e. he participated in paying the check runners for their services.

**ROLE OF DEFENDANT LATASHA SNEAD**

6. Defendant LATASHA SNEAD was an employee of Wachovia Bank, who provided bank customer information to defendant ANDRE DAVIS, including copies of checks sent to a Wachovia “lock-box.” With these checks, defendant DAVIS was able to obtain bank customers’ names, addresses, bank account numbers, and signatures for customers of TD Bank, Citizens Bank, Wachovia Bank, and PNC Bank.

**ROLE OF DEFENDANT TALAYA LITTLE**

7. Defendant TALAYAH LITTLE was an employee of TD Bank, who provided bank customer information to defendant ANDRE DAVIS, including customers’ driver’s license number, bank account numbers, balances, and dates of last deposit.

8. **ROLE OF DEFENDANT KEITH ENNIS**

Defendant KEITH ENNIS acted as a check runner. In that capacity, using TD Bank customer information provided by defendant TALAYAH LITTLE to defendant ANDRE DAVIS, defendant ENNIS pretended to be several different TD Bank customers and made fraudulent withdrawals from the accounts of those customers.

9. By means of this conspiracy, defendants ANDRE DAVIS, MIKE KNOX, LATASHA SNEAD, TALAYAH LITTLE, and KEITH ENNIS fraudulently obtained and attempted to obtain in excess of \$600,000.

## OVERT ACTS

In furtherance of the conspiracy, defendants ANDRE DAVIS, MIKE KNOX, LATASHA SNEAD, TALAYAH LITTLE, and KEITH ENNIS, and other persons known and unknown to the grand jury, committed the following overt acts in the Eastern District of Pennsylvania, and elsewhere:

### **I. Recruitment of Bank Employees**

1. From on or about October 21, 2005, to on or about October 30, 2009, defendant ANDRE DAVIS, and others unknown to the grand jury, recruited employees of various banks, including Citizens Bank, TD Bank, and Wachovia Bank, to provide and verify names, addresses, dates of birth, social security numbers, driver's license numbers, account numbers, and account balances of account holders of those banks.

#### **A. Citizens Bank employee – Nina Jones**

2. From on or about September 1, 2005, to on or about January 19, 2006, an employee of Citizens Bank, Nina Jones, charged elsewhere, provided to, and verified for, defendant ANDRE DAVIS the bank account and personal information of approximately 16 Citizens Bank account holders.

3. From on or about November 22, 2005, to on or about March 2, 2006, defendant ANDRE DAVIS used the information provided by Nina Jones to acquire and attempt to acquire approximately \$75,000 from Citizens Bank by having individuals known and unknown to the grand jury present fraudulent identification in the name of those account holders to tellers in order to cash fraudulent checks and make fraudulent withdrawals against the accounts of those Citizens Bank account holders.

**B. Wachovia Bank employee – Kyliya Alston**

From on or about October 1, 2008, to on or about December 18, 2008:

4. Kyliya Alston, a Wachovia Bank employee, charged elsewhere, used her position as a teller at a Philadelphia, Pennsylvania branch of Wachovia Bank to improperly acquire account information, including account numbers, for the Wachovia Bank accounts of approximately seven Wachovia Bank account holders.

5. Kyliya Alston then gave that account information to persons unknown to the grand jury. The information for approximately two Wachovia Bank account holders was then provided to defendants ANDRE DAVIS and MIKE KNOX, and others unknown to the grand jury, who used that information to acquire and attempt to acquire approximately \$11,000 from Wachovia Bank by having Melvin Allen, charged elsewhere, present fraudulent identification in the name of those account holders to tellers in order to make fraudulent withdrawals against the accounts of those Wachovia Bank account holders.

**C. TD Bank employees – Defendant TALAYAH LITTLE and Aishe Walker**

6. From on or about January 19, 2009, to on or about March 9, 2009, defendant TALAYAH LITTLE, an employee of TD Bank, used her position with TD Bank to:

a. improperly access computerized information for TD Bank account holders, such as the account holders' driver's license numbers; and

b. recruited fellow TD Bank employee, Aishe Walker, charged elsewhere, to use her position at TD Bank to improperly access computerized account information for TD Bank account holders, such as account balances and dates of last deposits, which information Walker provided to defendant LITTLE.

c. After receiving the stolen computerized information, defendant LITTLE then passed on this information to defendant ANDRE DAVIS, which included victims' driver's license numbers and bank account information.

7. From on or about February 5, 2009, to on or about July 3, 2009, defendants ANDRE DAVIS and MIKE KNOX, with others known and unknown to the grand jury, used the information provided to defendant DAVIS by defendant TALAYAH LITTLE to acquire and attempt to acquire approximately \$299,000 from TD Bank by having defendant KEITH ENNIS, and Melvin Allen and Byron Craig, charged elsewhere, and others unknown to the grand jury, act as check runners, present fraudulent identification in the name of those account holders to tellers, and make fraudulent withdrawals from the accounts of TD Bank account holders.

**D. Wachovia Bank employee - defendant LATASHA SNEAD**

8. From on or about October 13, 2009, to on or about October 30, 2009, defendant LATASHA SNEAD, an employee of Wachovia Bank, provided to defendant ANDRE DAVIS the bank account and personal information of approximately 17 account holders of TD Bank, Citizens Bank, Wachovia Bank, and PNC Bank.

9. From on or about October 14, 2009, to on or about April 14, 2010, defendant ANDRE DAVIS used the information provided by defendant LATASHA SNEAD to acquire and attempt to acquire approximately \$134,000 from TD Bank, Citizens Bank, Wachovia Bank, and PNC Bank by having Felicia Taliaferro, charged elsewhere, and other persons unknown to the grand jury present fraudulent identification in the name of those account holders to tellers to cash fraudulent checks and make fraudulent withdrawals against the bank accounts of the account holders of Wachovia Bank, Citizens Bank, and PNC Bank.

**E. Citizens Bank employee Kushiek Matthews**

10. From on or about October 14, 2009, to on or about October 19, 2009, Kushiek Matthews, an employee of Citizens Bank, charged elsewhere, provided to, and verified for, defendant ANDRE DAVIS the addresses, bank account information, and social security numbers of approximately seven Citizens Bank account holders on Citizens Bank accounts compromised by defendant LATASHA SNEAD.

11. From on or about October 15, 2009, to on or about December 17, 2009, defendant ANDRE DAVIS and others unknown to the grand jury used the information provided and verified by defendant LATASHA SNEAD and Kushiek Matthews to acquire and attempt to acquire approximately \$53,000 from Citizens Bank by having Felicia Taliaferro and other persons unknown to the grand jury present fraudulent identification in the name of those account holders to tellers in order to cash fraudulent checks with Citizens Bank.

**II. Fraudulent Transactions by Check Runners**

12. From on or about November 22, 2005 to on or about May 13, 2010, defendants ANDRE DAVIS and MIKE KNOX, and others unknown to the grand jury, provided T.W. and D.A., known to the grand jury, Melvin Allen, Byron Craig, Felicia Taliaferro and defendant KEITH ENNIS, and others, known and unknown to the grand jury, with necessary means of identification and personal information of customers of banks, including customers of Citizens Bank, Wachovia Bank, TD Bank, and PNC Bank with fraudulent checks and bank accounts numbers, to permit them to cash fraudulent checks against, or make fraudulent withdrawals from, the accounts of the banks' customers.

13. From on or about November 22, 2005 to on or about May 13, 2010, with means of identification and personal and bank account information provided by defendants ANDRE DAVIS and MIKE KNOX and others unknown to the grand jury, T.W. and D.A., Melvin Allen, Byron Craig, Felicia Taliaferro and defendant KEITH ENNIS, and others, known and unknown to the grand jury, pretended to be other people, in order to cash fraudulent checks or make fraudulent withdrawals from the accounts of the banks' customers.

14. From on or about November 22, 2005 to on or about May 13, 2010, defendant KEITH ENNIS, and T.W. and D.A., Melvin Allen, Byron Craig, Felicia Taliaferro, and others known and unknown to the grand jury, presented the fraudulent identifications and personal and bank account information they received from defendants ANDRE DAVIS and MIKE KNOX and others unknown to the grand jury, when they asked the bank tellers to process their transactions.

15. From on or about November 22, 2005 to on or about May 13, 2010, after each fraudulent transaction, defendant KEITH ENNIS and T.W. and D.A., Melvin Allen, Byron Craig, Felicia Taliaferro, and others, known and unknown to the grand jury, gave the proceeds to defendants ANDRE DAVIS and MIKE KNOX and others unknown to the grand jury.

**A. Check runner - T.W.**

16. From on or about December 20, 2005 to on or about January 20, 2006, at the direction of defendant ANDRE DAVIS, T.W., a person known to the grand jury, conducted and attempted to conduct approximately 12 fraudulent transactions, presenting the account number and forged signature of Citizens Bank account holders at Citizens Bank branches in Pennsylvania. In conducting and attempting to conduct these transactions, T.W. pretended to be

approximately four different Citizens Bank account holders, and stole and attempted to steal approximately \$21,000 from the banks.

**B. Check runner - D.A.**

17. From on or about January 9, 2006, to on or about March 2, 2006, at the direction of defendant ANDRE DAVIS, D.A., a person known to the grand jury, conducted and attempted to conduct approximately 13 fraudulent transactions, presenting the account number and forged signature of Citizens Bank account holders at Citizens Bank branches in Pennsylvania. In conducting and attempting to conduct these transactions, D.A. pretended to be approximately three different Citizens Bank account holders, and stole and attempted to steal approximately \$28,000 from the banks.

**C. Check Runner - Melvin Allen**

18. From on or about January 21, 2009, to on or about March 18, 2009, at the direction of defendants ANDRE DAVIS and MIKE KNOX, and accompanied by defendants DAVIS and KNOX, Melvin Allen conducted and attempted to conduct approximately 36 fraudulent transactions, presenting the account number and forged signature of Wachovia Bank, Citizens Bank, and TD Bank account holders at bank branches in New Jersey and New York. In conducting and attempting to conduct these fraudulent transactions, Melvin Allen pretended to be approximately 13 different bank account holders, and stole and attempted to steal approximately \$204,000 from Wachovia Bank, Citizens Bank, and TD Bank.

**D. Check Runner - Byron Craig**

19. From on or about March 25, 2009, to on or about March 26, 2009, at the direction of defendants ANDRE DAVIS, and others unknown to the grand jury, Byron Craig conducted and attempted to conduct approximately four fraudulent transactions, presenting the account number and forged signature of TD Bank account holders at TD Bank branches in New Jersey. In conducting and attempting to conduct these transactions, Byron Craig pretended to be approximately four different TD Bank account holders, and stole and attempted to steal approximately \$17,000 from TD Bank. During these fraudulent transactions, Craig was accompanied by defendants DAVIS and others unknown to the grand jury.

**E. Check Runner Felicia Taliaferro**

20. From on or about June 27, 2009, to on or about May 13, 2010, at the direction of defendant ANDRE DAVIS, Felicia Taliaferro conducted and attempted to conduct fraudulent transactions, presenting the account number and forged signature of account holders at branches of Citizens Bank, Wachovia Bank, PNC Bank and TD Bank in Pennsylvania and New Jersey. In conducting and attempting to conduct these transactions, Taliaferro pretended to be approximately 24 different account holders, and stole and attempted to steal approximately \$187,000 from Citizens Bank, Wachovia Bank, PNC Bank, and TD Bank.

**F. Check Runner - Defendant KEITH ENNIS**

21. From on or about May 20, 2009, to on or about July 3, 2009, at the direction of defendants ANDRE DAVIS and MIKE KNOX, and others unknown to the grand jury, defendant KEITH ENNIS conducted and attempted to conduct approximately 16 fraudulent transactions, presenting the account number and forged signature of TD Bank account holders at

TD Bank branches in New Jersey and Delaware. In conducting and attempting to conduct these transactions, defendant ENNIS pretended to be approximately nine different TD Bank account holders, and stole and attempted to steal approximately \$48,000 from TD Bank.

**G. Other Check Runners**

22. From on or about November 28, 2005, to on or about April 12, 2010, at the direction of defendants ANDRE DAVIS and MIKE KNOX, and others unknown to the grand jury, persons unknown to the grand jury conducted and attempted to conduct fraudulent transactions, presenting the account numbers and forged signatures of account holders of TD Bank, Citizens Bank, Wachovia Bank, and PNC Bank at bank branches in Pennsylvania and New Jersey. In conducting and attempting to conduct these transactions, the unknown check runners pretended to be approximately 14 different bank account holders, and stole and attempted to steal approximately \$80,000 from the banks.

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

**COUNT TWO**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. Paragraphs 1 and 3 through 9, and Overt Acts 1, 6 through 9, 12 through 15, and 18 through 22 of Count One of this superseding indictment are incorporated here.
2. From on or about January 19, 2009, to on or about April 20, 2010, in the Eastern District of Pennsylvania and elsewhere, defendants

**ANDRE DAVIS,  
a/k/a "Dre,"  
a/k/a "Murder,"  
MIKE KNOX,  
LATASHA SNEAD,  
a/k/a "Tasha,"  
TALAYAH LITTLE, and  
KEITH ENNIS**

knowingly executed, and attempted to execute, and aided and abetted the execution of, a scheme to defraud TD 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. From on or about January 19, 2009, to on or about March 26, 2009, defendant TALAYAH LITTLE, with the assistance of co-conspirator Aishe Walker, improperly acquired personal and account information for TD Bank account holders.
4. Defendant TALAYAH LITTLE then provided that personal and account information to defendant ANDRE DAVIS, who, with defendants MIKE KNOX and KEITH ENNIS, and others known and unknown to the grand jury, used it to fraudulently take, and attempt to take, approximately \$299,000 from TD Bank by making fraudulent withdrawals from the TD Bank accounts of those account holders.

5. With the information provided by defendant TALAYAH LITTLE and Aishe Walker, on a number of occasions, defendants ANDRE DAVIS and MIKE KNOX directed check runner Melvin Allen to pose as different TD Bank customers in order to make unauthorized withdrawals.

6. From on or about February 5, 2009, to on or about March 18, 2009, defendants ANDRE DAVIS and MIKE KNOX provided Melvin Allen with transportation from Philadelphia, Pennsylvania to New York and New Jersey for the purpose of fraudulently withdrawing money from the accounts of TD Bank account holders.

7. From on or about February 5, 2009, to on or about March 18, 2009, Melvin Allen used stolen account information and false identification documents of TD Bank account holders, provided to him by defendants ANDRE DAVIS and MIKE KNOX, to fraudulently withdraw money from the accounts of those TD Bank account holders, and then to share the proceeds with defendants DAVIS and KNOX.

8. In furtherance of the scheme, from on or about February 5, 2009, to on or about March 18, 2009, at the direction of defendants ANDRE DAVIS and MIKE KNOX, Melvin Allen fraudulently withdrew or attempted to withdraw funds at TD Bank branches in New York and Jersey.

9. With information provided by defendant TALAYAH LITTLE and Aishe Walker, defendant ANDRE DAVIS, and others unknown to the grand jury, directed check runners Byron Craig and defendant KEITH ENNIS to pose as TD Bank customers in order to make unauthorized withdrawals.

10. From on or about March 25, 2009, to on or about July 3, 2009, defendants ANDRE DAVIS and MIKE KNOX, and others unknown to the grand jury, provided defendant KEITH ENNIS and Byron Craig with transportation from Philadelphia, Pennsylvania to New Jersey for the purpose of fraudulently withdrawing money from the accounts of TD Bank account holders.

11. From on or about March 25, 2009, to on or about July 3, 2009, defendant KEITH ENNIS and Byron Craig used stolen account information and false identification documents of TD Bank account holders, provided to them by defendants ANDRE DAVIS and MIKE KNOX, and others unknown to the grand jury, to fraudulently withdraw money from the accounts of those TD Bank account holders, and to share the proceeds with defendants DAVIS and KNOX and others.

12. In furtherance of the scheme, from on or about March 25, 2009, to on or about March 26, 2009, at the direction of defendant ANDRE DAVIS, and others unknown to the grand jury, Byron Craig fraudulently withdrew or attempted to withdraw funds at TD Bank branches in New Jersey.

13. In furtherance of the scheme, from on or about May 20, 2009, to on or about July 3, 2009, at the direction of defendants ANDRE DAVIS and MIKE KNOX, and others unknown to the grand jury, defendant KEITH ENNIS fraudulently withdrew or attempted to withdraw funds at TD Bank branches in New Jersey.

14. From on or about October 13, 2009, to on or about October 30, 2009, defendant LATASHA SNEAD provided defendant ANDRE DAVIS with the bank account and personal information of approximately four account holders of TD Bank.

15. From on or about December 3, 2009, to on or about April 23, 2010, defendant ANDRE DAVIS and others unknown to the grand jury, used the information provided by defendant LATASHA SNEAD and information provided by other persons, unknown to the grand jury, to acquire and attempt to acquire approximately \$134,000 from TD Bank by having Felicia Taliaferro and other persons, unknown to the grand jury, present fraudulent identification in the name of those account holders to tellers in order to cash fraudulent checks and to make fraudulent withdrawals against the bank accounts of the TD Bank account holders.

16. From on or about December 3, 2009, to on or about April 23, 2010, Felicia Taliaferro and others used stolen account information and false identification documents of TD Bank account holders, provided by defendant ANDRE DAVIS and others unknown to the grand jury, to fraudulently withdraw money from the accounts of those TD Bank account holders, and to share the proceeds with defendant DAVIS and others.

17. In furtherance of the scheme, from on or about December 3 2009, to on or about April 23, 2010, at the direction of defendant ANDRE DAVIS and others, Felicia Taliaferro and others deposited fraudulent checks and fraudulently withdrew funds at TD Bank branches in Pennsylvania and New Jersey.

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

**COUNTS THREE THROUGH EIGHT**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about the dates listed below, to on or about March 18, 2009, in the Eastern District of Pennsylvania and elsewhere, defendants

**ANDRE DAVIS,  
a/k/a "Dre,"  
a/k/a "Murder,"  
MIKE KNOX, and  
TALAYAH LITTLE**

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

<b><u>COUNT</u></b>	<b><u>DATE</u></b>	<b><u>ACCOUNT HOLDER</u></b>	<b><u>BANK</u></b>
3	02/05/09	E.F.	TD Bank
4	03/11/09	M.F.	TD Bank
5	03/11/09	R.J.	TD Bank
6	03/11/09	K.M.	TD Bank
7	03/18/09	S.S.	TD Bank
8	03/18/09	R.R.	TD Bank

All in violation of Title 18, United States Code, Sections 1028A(a)(1), (c)(5) and

2.

**COUNTS NINE THROUGH TWELVE****THE GRAND JURY FURTHER CHARGES THAT:**

On or about the dates listed below, in the Eastern District of Pennsylvania and elsewhere, defendants

**ANDRE DAVIS,  
a/k/a "Dre,"  
a/k/a "Murder," and  
TALAYAH LITTLE**

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

<b><u>COUNT</u></b>	<b><u>DATE</u></b>	<b><u>ACCOUNT HOLDER</u></b>	<b><u>BANK</u></b>
9	03/25/09	T.H.	TD Bank
10	03/25/09	B.T.	TD Bank
11	03/26/09	J.T	TD Bank.
12	03/26/09	D.A.	TD Bank

All in violation of Title 18, United States Code, Sections 1028A(a)(1), (c)(5) and

2.

**COUNTS THIRTEEN THROUGH FIFTEEN**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about the dates listed below, in the Eastern District of Pennsylvania and elsewhere, defendants

**ANDRE DAVIS,  
a/k/a "Dre,"  
a/k/a "Murder,"  
MIKE KNOX,  
TALAYAH LITTLE, and  
KEITH ENNIS**

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

<b><u>COUNT</u></b>	<b><u>DATE</u></b>	<b><u>ACCOUNT HOLDER</u></b>	<b><u>BANK</u></b>
13	05/20/09	J.B.	TD Bank
14	05/20/09	M.P.	TD Bank
15	06/30/09	J.K.	TD Bank

All in violation of Title 18, United States Code, Sections 1028A(a)(1), (c)(5), and

2.

**COUNTS SIXTEEN THROUGH EIGHTEEN**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about the dates listed below, in the Eastern District of Pennsylvania and elsewhere, defendants

**ANDRE DAVIS,  
a/k/a "Dre,"  
a/k/a "Murder," and  
LATASHA SNEAD,  
a/k/a "Tasha,"**

knowingly and without lawful authority, transferred, possessed, and used, and aided and abetted the transfer, possession and use of, a means of identification of another person, that is, 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>
16	12/03/09	S.A.	TD Bank
17	05/04/09	W.H.	TD Bank
18	01/27/10	J.H.	TD Bank

All in violation of Title 18, United States Code, Sections 1028A(a)(1), (c)(5) and

2.

**COUNTS NINETEEN AND TWENTY**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about the dates listed below, in the Eastern District of Pennsylvania and elsewhere, defendant

**ANDRE DAVIS,  
a/k/a "Dre,"  
a/k/a "Murder"**

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

<b><u>COUNT</u></b>	<b><u>DATE</u></b>	<b><u>ACCOUNT HOLDER</u></b>	<b><u>BANK</u></b>
19	04/14/10	M.C.	TD Bank
20	04/23/10	S.L.	TD Bank

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

**COUNT TWENTY-ONE**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. Paragraphs 1, 3 through 6, and Overt Acts 1 through 3, 8 through 18, 20, and 21 of Count One of this superseding indictment are incorporated here.

2. From on or about September 1, 2005, to on or about April 14, 2010 in the Eastern District of Pennsylvania and the District of New Jersey, defendants

**ANDRE DAVIS,  
a/k/a "Dre,"  
a/k/a "Murder,"  
MIKE KNOX, and  
LATASHA SNEAD,  
a/k/a "Tasha,"**

knowingly executed, and attempted to execute, and aided an abetted the execution of, a scheme to defraud Citizens 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. From on or about September 1, 2005, to on or about January 19, 2006, Citizens Bank employee Nina Jones improperly acquired and verified personal and account information for Citizens Bank account holders.

4. Nina Jones then provided that personal and account information to defendant ANDRE DAVIS, who, with others known and unknown to the grand jury, used it to fraudulently take, and attempt to take, approximately \$75,000 from Citizens Bank by cashing fraudulent checks against, and making fraudulent withdrawals from, the Citizens Bank accounts of those account holders.

5. With information provided to defendant ANDRE DAVIS by Nina Jones, defendant DAVIS and others unknown to the grand jury directed check runners, including T.W., D.A., and others known and unknown to the grand jury, to pose as Citizens Bank customers in order to cash fraudulent checks and make unauthorized withdrawals.

6. From on or about November 22, 2005, to on or about March 2, 2006, the check runners used stolen account information and false identification documents of Citizens Bank account holders, provided to them by defendant ANDRE DAVIS, and others unknown to the grand jury, to fraudulently withdraw money from the accounts of those Citizens Bank account holders, and to share the proceeds with defendant DAVIS and others.

7. In furtherance of the scheme, from on or about November 22, 2005, to on or about March 2, 2006, at the direction of defendant ANDRE DAVIS and others, the check runners cashed and attempted to cash fraudulent checks, and fraudulently withdrew or attempted to withdraw funds, at Citizens Bank branches in Pennsylvania.

8. With information provided by others unknown to the grand jury, defendants ANDRE DAVIS and MIKE KNOX, and others known and unknown to the grand jury, directed check runner Melvin Allen to pose as Citizens Bank customers in order to make unauthorized withdrawals.

9. In furtherance of the scheme, from on or about January 21, 2009, to on or about January 30, 2009, at the direction of defendants ANDRE DAVIS and MIKE KNOX, Melvin Allen fraudulently withdrew or attempted to withdraw funds at Citizens Bank branches in New Jersey.

10. From on or about October 13, 2009, to on or about October 30, 2009, defendant LATASHA SNEAD and Kushiek Matthews improperly acquired and verified personal and account information for Citizens Bank account holders.

11. Defendant LATASHA SNEAD and Kushiek Matthews then provided that personal and account information to defendant ANDRE DAVIS, who, with others unknown to the grand jury, used it to fraudulently take, and attempt to take, approximately \$76,000 from Citizens Bank by depositing and cashing fraudulent checks on, and making fraudulent withdrawals from, the Citizens Bank accounts of those account holders.

12. With information provided to defendant ANDRE DAVIS by defendant LATASHA SNEAD and Kushiek Matthews, defendant DAVIS and others unknown to the grand jury directed Felicia Taliaferro and other persons, unknown to the grand jury, to pose as Citizens Bank customers in order to cash fraudulent checks and make unauthorized withdrawals.

13. From on or about October 15, 2009, to on or about April 14, 2010, Felicia Taliaferro and others used stolen account information and false identification documents of Citizens Bank account holders, provided to them by defendant ANDRE DAVIS and others unknown to the grand jury, to fraudulently withdraw money from the accounts of those Citizens Bank account holders, and to share the proceeds with defendant DAVIS and others.

14. In furtherance of the scheme, from on or about October 15, 2009, to on or about April 14, 2010, at the direction of defendant ANDRE DAVIS and others, Felicia Taliaferro and others cashed and attempted to cash fraudulent checks, and fraudulently withdrew or attempted to withdraw funds at Citizens Bank branches in Pennsylvania and New Jersey.

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

**COUNTS TWENTY-TWO THROUGH TWENTY-EIGHT**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about the dates listed below, in the Eastern District of Pennsylvania and elsewhere, defendants

**ANDRE DAVIS,  
a/k/a "Dre,"  
a/k/a "Murder," and  
LATASHA SNEAD,  
a/k/a "Tasha,"**

knowingly and without lawful authority, transferred, possessed, and used, and aided and abetted the transfer, possession and use of, a means of identification of another person, that is, 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>
22	10/15/09	N.L	Citizens Bank
23	10/15/09	T.T.	Citizens Bank
24	10/28/09	C.C.	Citizens Bank
25	10/28/09	B.M.	Citizens Bank
26	10/28/09	M.B.	Citizens Bank
27	04/13/10	M.S	Citizens Bank
28	04/14/10	L.M.	Citizens Bank

All in violation of Title 18, United States Code, Sections 1028A(a)(1), (c)(5), and

2.

**COUNT TWENTY-NINE**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. Paragraphs 1 and 3 through 6, and Overt Acts 1, 4, 5, 8, 9, 12 through 15, 18, and 20 of Count One of this superseding indictment are incorporated here.
2. From on or about October 1, 2008, to on or about March 11, 2010, in the Eastern District of Pennsylvania and the District of New Jersey, defendants

**ANDRE DAVIS,  
a/k/a "Dre,"  
a/k/a "Murder,"  
MIKE KNOX, and  
LATASHA SNEAD,  
a/k/a "Tasha,"**

knowingly executed, 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**

3. From on or about October 1, 2008, to on or about December 18, 2008, Kyliya Alston used her position as a teller at a Philadelphia, Pennsylvania branch of Wachovia Bank to improperly acquire account information, including account numbers, for the Wachovia Bank accounts of approximately seven Wachovia Bank account holders.
4. Kyliya Alston then gave that account information to persons unknown to the grand jury. The information for approximately two Wachovia Bank account holders was then provided to defendants ANDRE DAVIS and MIKE KNOX, and others unknown to the grand jury, who used that information to acquire and attempt to acquire approximately \$11,000 from Wachovia Bank by having Melvin Allen present fraudulent identification in the name of those

account holders to tellers in order to make fraudulent withdrawals against the accounts of those Wachovia Bank account holders.

5. With information provided by Wachovia Bank employee Kyla Alston, defendants ANDRE DAVIS and MIKE KNOX directed check runner Melvin Allen to pose as Wachovia Bank customers in order to make unauthorized withdrawals.

6. In furtherance of the scheme, on or about January 21, 2009, and on or about January 22, 2009, defendants ANDRE DAVIS and MIKE KNOX provided Melvin Allen with transportation from Philadelphia, Pennsylvania to New Jersey for the purpose of fraudulently withdrawing money from the accounts of Wachovia Bank account holders.

7. In furtherance of the scheme, from on or about January 21, 2009, to on or about January 22, 2009, Melvin Allen used stolen account information and false identification documents of Wachovia Bank account holders, provided to him by defendants ANDRE DAVIS and MIKE KNOX, to fraudulently withdraw money from the accounts of those Wachovia Bank account holders, and to share the proceeds with defendants DAVIS and KNOX.

8. In furtherance of the scheme, from on or about January 21, 2009, to on or about January 22, 2009, at the direction of defendants ANDRE DAVIS and MIKE KNOX, Melvin Allen fraudulently withdrew and attempted to withdraw funds at Wachovia Bank branches in New Jersey.

9. From on or about October 13, 2009, to on or about October 30, 2009, defendant LATASHA SNEAD provided to defendant ANDRE DAVIS the bank account and personal information of approximately seven account holders of Wachovia Bank.

10. From on or about October 14, 2009, to on or about March 11, 2010, defendant ANDRE DAVIS and others used the information provided by defendant LATASHA SNEAD to acquire and attempt to acquire approximately \$24,000 from Wachovia Bank by having Felicia Taliaferro and other persons, unknown to the grand jury, present fraudulent identification in the name of those account holders to tellers in order to deposit fraudulent checks and make fraudulent withdrawals against the bank accounts of the Wachovia Bank account holders.

11. With information provided to defendant ANDRE DAVIS by defendant LATASHA SNEAD, defendant DAVIS and others directed Felicia Taliaferro and others to pose as Wachovia Bank customers in order to deposit fraudulent checks and make unauthorized withdrawals.

12. In furtherance of the scheme, from on or about October 16, 2009, to on or about March 11, 2010, Felicia Taliaferro and others used stolen account information and false identification documents of Wachovia Bank account holders, provided by defendant ANDRE DAVIS and others, to fraudulently withdraw money from the accounts of those Wachovia Bank account holders, and to share the proceeds with defendant DAVIS and others.

13. In furtherance of the scheme, from on or about October 16, 2009, to on or about March 11, 2010, at the direction of defendant ANDRE DAVIS and others, Felicia Taliaferro and others deposited fraudulent checks, and fraudulently withdrew funds at Wachovia Bank branches in Pennsylvania and New Jersey.

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

**COUNTS THIRTY THROUGH THIRTY-ONE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about the dates listed below, in the Eastern District of Pennsylvania and elsewhere, defendants

**ANDRE DAVIS,  
a/k/a "Dre,"  
a/k/a "Murder," and  
MIKE KNOX**

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

<b><u>COUNT</u></b>	<b><u>DATE</u></b>	<b><u>ACCOUNT HOLDER</u></b>	<b><u>BANK</u></b>
30	01/21/09	D.M.	Wachovia Bank
31	01/22/09	J.T.	Wachovia Bank

All in violation of Title 18, United States Code, Sections 1028A(a)(1), (c)(5), and

2.

**COUNTS THIRTY-TWO THROUGH THIRTY-SIX**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about the dates listed below, in the Eastern District of Pennsylvania and elsewhere, defendants

**ANDRE DAVIS,  
a/k/a "Dre,"  
a/k/a "Murder," and  
LATASHA SNEAD,  
a/k/a "Tasha,"**

knowingly and without lawful authority, transferred, possessed, and used, and aided and abetted the transfer, possession and use of, a means of identification of another person, that is, 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>
32	10/16/09	C.D.	Wachovia Bank
33	11/05/09	A.D.	Wachovia Bank
34	11/05/09	D.S.	Wachovia Bank
35	01/08/10	M.P.	Wachovia Bank
36	03/10/10	D.L.	Wachovia Bank

All in violation of Title 18, United States Code, Sections 1028A(a)(1), (c)(5), and

2.

**COUNT THIRTY-SEVEN**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. Paragraphs 1, 3, 4, and 6, and Overt Acts 1, 8, 9, 12 through 15, and 20 of Count One of this superseding indictment are incorporated here.
2. From on or about October 13, 2009, to on or about May 13, 2010, in the Eastern District of Pennsylvania, defendants

**ANDRE DAVIS,  
a/k/a "Dre,"  
a/k/a "Murder," and  
LATASHA SNEAD,  
a/k/a "Tasha,"**

knowingly executed, and attempted to execute, and aided and abetted the execution of, a scheme to defraud PNC 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. With information provided to defendant ANDRE DAVIS by defendant LATASHA SNEAD, defendant DAVIS directed Felicia Taliaferro and other persons, unknown to the grand jury, to pose as PNC Bank customers in order to deposit fraudulent checks and make unauthorized withdrawals.
4. From on or about October 15, 2009, to on or about May 13, 2010, defendant ANDRE DAVIS and others used the information provided by defendant LATASHA SNEAD and others to acquire and attempt to acquire approximately \$28,000 from PNC Bank by having Felicia Taliaferro and other persons, unknown to the grand jury, present fraudulent

identification in the name of those account holders to tellers in order to deposit fraudulent checks and make fraudulent withdrawals against the bank accounts of the PNC Bank account holders.

5. From on or about October 15, 2009, to on or about May 13, 2010, Felicia Taliaferro and others used stolen account information and false identification documents of PNC Bank account holders, provided by defendant ANDRE DAVIS and others, to fraudulently withdraw money from the accounts of those PNC Bank account holders, and to share the proceeds with defendant DAVIS and others.

6. In furtherance of the scheme, from on or about October 15, 2009, to on or about May 13, 2010, at the direction of defendant ANDRE DAVIS and others, Felicia Taliaferro and others deposited fraudulent checks, and fraudulently withdrew funds at PNC Bank branches in Pennsylvania.

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

**COUNTS THIRTY-EIGHT THROUGH FORTY**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about the dates listed below, in the Eastern District of Pennsylvania, and elsewhere, defendants

**ANDRE DAVIS,  
a/k/a "Dre," and  
LATASHA SNEAD,  
a/k/a "Tasha,"**

knowingly and without lawful authority, transferred, possessed and used, and aided and abetted the transfer, possession, and use of, a means of identification of the persons indicated below, each person constituting a separate count, during and in relation to bank fraud.

<b><u>COUNT</u></b>	<b><u>DATE</u></b>	<b><u>ACCOUNT HOLDER</u></b>	<b><u>BANK</u></b>
38	10/15/09	L.B.	PNC Bank
49	10/15/09	C.M.	PNC Bank
40	11/07/09	M.C.	PNC Bank

All 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 371 and 1344, set forth in Counts One, Two, Twenty-One, Twenty-Nine, and Thirty-Seven of this superseding indictment, defendants

**ANDRE DAVIS,  
a/k/a "Dre,"  
a/k/a "Murder,"  
MIKE KNOX,  
LATASHA SNEAD,  
a/k/a "Tasha,"  
TALAYAH LITTLE, and  
KEITH ENNIS**

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 superseding indictment, including, but not limited to, the sum of \$466,301.

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, Sections 928(b),

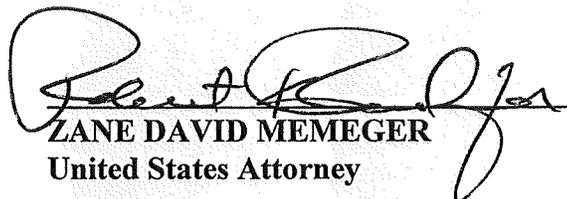
incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property subject to forfeiture.

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

**A TRUE BILL:**

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**GRAND JURY FOREPERSON**



**ZANE DAVID MEMEGER**  
United States Attorney