IN THE UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF PENNSYLVANIA

:	CRIMINAL NO. <u>10-</u>
:	DATE FILED:
:	VIOLATIONS:
:	18 U.S.C. § 1029(b)(2) (conspiracy to commit access device fraud - 1 count)
	18 U.S.C. § 1623 (false statement before
:	the grand jury - 1 count)
	: : : :

INFORMATION

COUNT ONE

THE UNITED STATES ATTORNEY CHARGES THAT:

At all times material to this information:

1. Defendant DEANNA R. PERRY was the girlfriend of Cantrell Fletcher,

charged elsewhere.

2. Defendant DEANNA R. PERRY lived, off-and-on, with Cantrell Fletcher in Philadelphia, Pennsylvania.

3. From in or about April 2006 to in or about April 2007, defendant

DEANNA R. PERRY worked at a Holiday Inn Express hotel at 13th and Walnut Streets in

Philadelphia, Pennsylvania. From in or about September 2007 to in or about January 2008,

defendant PERRY worked at a Holiday Inn Express hotel in Frazer, Pennsylvania.

4. Holiday Inn Express hotels do business in interstate commerce.

5. The servicers of credit and debit cards do business in interstate commerce.

6. A skimming device, or skimmer, is a device that is capable of reading and

recording the information stored on the magnetic strips of credit or debit cards, and is capable of

transferring that information to another electronic storage device, such as a computer, by use of connecting cables.

7. An encoding device, or encoder, is a device that is capable of reading the information stored on the magnetic strips of credit or debit cards and also writing information to the magnetic strips on credit or debit cards.

8. From in or about April 2006, to in or about May 2009, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendant

DEANNA R. PERRY

conspired and agreed, with Cantrell Fletcher, charged elsewhere, and others known to the United States Attorney, to commit an offense against the United States, that is, to knowingly and with intent to defraud traffic in and use unauthorized credit card and debit card numbers during a one-year period, and by such conduct obtain something of value aggregating \$1,000 or more during that period, and thereby affected interstate commerce, in violation of Title 18, United States Code, Section 1029(a)(2).

MANNER AND MEANS

It was part of the conspiracy that:

9. Defendant DEANNA R. PERRY used a skimming device at her places of employment to steal the credit and debit card numbers of unsuspecting hotel customers and provided those stolen card numbers to Cantrell Fletcher, who used an encoding device in their apartment to record the stolen numbers onto the magnetic strips of other white plastic cards, gift cards, and credit and debit cards so that he and defendant PERRY could use the stolen numbers to buy things of value, which totaled over \$1,000 during a one-year period.

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OVERT ACTS

In furtherance of the conspiracy and to accomplish its object, defendant DEANNA R. PERRY, Cantrell Fletcher, and others known to the United States Attorney, committed the following overt acts, among others, in the Eastern District of Pennsylvania and elsewhere:

1. From in or about April 2006 to in or about April 2007, defendant DEANNA R. PERRY used a skimming device at the Holiday Inn Express hotel at 13th and Walnut Streets, Philadelphia, to steal at least four customers' credit and debit card numbers, which she provided to Cantrell Fletcher.

2. From in or about September 2007 to in or about January 2008, defendant DEANNA R. PERRY used a skimming device at the Holiday Inn Express hotel in Frazer, Pennsylvania, to steal at least eleven customers' credit and debit card numbers, which she provided to Cantrell Fletcher.

3. From in or about April 2006 to in or about January 2008, Cantrell Fletcher used an encoding device in their apartment to transfer the stolen card numbers provided to him by defendant DEANNA R. PERRY to the magnetic strips on other plastic cards, such as plain white plastic cards, gift cards, and other credit and debit cards.

4. From in or about April 2006 to in or about May 2009, defendant DEANNA R. PERRY, Cantrell Fletcher, and others known to the United States Attorney, used the plastic cards on which the stolen card numbers provided by defendant PERRY were recorded to buy things of value that totaled over \$1,000 during a one-year period, including clothing, gas, and flat screen televisions and other expensive electronic merchandise they could sell on the street in exchange for cash.

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All in violation of Title 18, United States Code, Section 1029(b)(2).

COUNT TWO

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

1. Paragraphs 1 through 7 and 9, and Overt Acts 1 through 4 of Count One are incorporated here.

2. In or about May 2009, a federal grand jury in the Eastern District of Pennsylvania was investigating an access device fraud and aggravated identity theft conspiracy involving, among other people, Cantrell Fletcher.

3. It was a matter material to the grand jury whether defendant DEANNA R. PERRY was stealing identity information and credit and debit card numbers from her places of employment and providing that information to Cantrell Fletcher.

4. It was a matter material to the grand jury to determine who possessed and used the encoding device, computers, various plastic cards, and stolen card numbers found during execution of a search warrant at the apartment of defendant DEANNA R. PERRY and Cantrell Fletcher on May 6, 2009, and to determine the source of any stolen credit and debit card numbers found at that time.

5. On or about May 21, 2009, in Philadelphia, in the Eastern District of Pennsylvania, defendant

DEANNA R. PERRY

while under oath in a proceeding before the federal grand jury of the United States District Court for the Eastern District of Pennsylvania, knowingly made false declarations in response to questions asked to her with respect to the material matters as described in Paragraphs 3 and 4 of this Count as follows:

Q: There was a, what I'm going to call a card encoder, a box roughly the size

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of - roughly six to ten inches long that has a space in the middle where you could run a card through like a credit card.

- A: No.
- Q: Was that yours?
- A: No, it wasn't.
- Q: Do you know whose it was?
- A: <u>No, I don't.</u>
- Q: Did you ever use it?
- A: <u>No.</u>
- Q: Did you ever see Cantrell handle it?
- A: <u>No.</u> ***
- Q: There were a number of blank white plastic cards the size of credit cards that have a magnetic strip on the back; were those yours?
- A: No.
- Q: Do you know whose they were?
- A: <u>No, I don't.</u>
- Q: Did you ever see Cantrell Fletcher handle any blank white plastic cards?
- A: <u>No, I didn't.</u> * * *
- Q: All right. You had a number of credit cards in the house, correct?
- A: Yes.
- Q: Or in the apartment?

- A: Yes.
- Q: These were credit cards that had your name on the front?
- A: Yes.
- Q: And were you aware that the magnetic strips on the backs of two of those cards had been wiped clean of information?
- A: <u>No.</u>
- Q: Do you know who did that to your cards?
- A: <u>No, I don't.</u> * * *
- Q: Did you have any involvement in a credit card fraud scheme?
- A: <u>No.</u>
- Q: Were you recording peoples' credit card information at any of your jobs?
- A: <u>No.</u>
- Q: Were you giving credit card information belonging to other people to Cantrell Fletcher?
- A: <u>No.</u>
- Q: Did you know Cantrell Fletcher to be involved in any credit card fraud?
- A: <u>No.</u>

* * *

- A GRAND JUROR: Did you ever question why some of these things were in the place you were living?
- A: <u>I never seen any of those things.</u> I seen as far as the laptop and those things, <u>but as far as the credit card encoder and all that stuff, I never seen.</u>

I was back and forth from there to my mom's, <u>I never overcame any of</u> those things.

6. The underlined testimony of defendant DEANNA R. PERRY, as set forth in Paragraph 5 of this Count, as defendant PERRY then well knew and believed, was false, in that defendant PERRY knew at the time she made these statements that Cantrell Fletcher used the encoding device to transfer stolen card numbers onto the magnetic strips of other cards, he had used the encoding device to transfer stolen card numbers she provided, and she had seen him use it. She also knew that the blank white plastic cards belonged to Fletcher and that he used them in the credit and debit card fraud scheme. She also knew that her own credit cards were blank because Fletcher periodically used them to store stolen card numbers. She knew that she had been providing stolen credit and debit card numbers to Fletcher for him to use in the credit and debit card scheme. And finally, she knew that she had seen the white plastic cards and encoding device in the apartment.

In violation of Title 18, United States Code, Section 1623.

ZANE DAVID MEMEGER UNITED STATES ATTORNEY