

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

UNITED STATES OF AMERICA	:	CRIMINAL NO. 10- 145
v.	:	DATE FILED: 3-11-10
WILLIAM M. FORD,	:	VIOLATION:
a/k/a "Will,"		18 U.S.C. § 371 (conspiracy - 1 count)
a/k/a "Chill,"	:	18 U.S.C. § 1344 (bank fraud - 3 counts)
SHAWN EDWARDS,		18 U.S.C. § 1028A(a)(1), (c)(5)
a/k/a "Shiz,"	:	(aggravated identity theft - 8 counts)
TIMOTHY VICTOR-CANTY,		18 U.S.C. § 2 (aiding and abetting)
a/k/a "T.I.,"	:	Notice of forfeiture
a/k/a "Black,"		
CHRISTOPHER VICTOR-CANTY	:	
ANDRE TAYLOR,		
a/k/a "Dre"	:	

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

At all times material to this indictment:

1. The following banks were financial institutions, the deposits of which were insured by the Federal Deposit Insurance Corporation:
 - a. Wachovia Bank, certificate number 33869;
 - b. Commerce Bank, certificate no. 21140; and
 - c. First Penn Bank, certificate no. 27013.

2. Gladisha Echevarria, charged elsewhere, worked as a teller at Wachovia Bank in Philadelphia from in or about January 2003, to in or about August 2005; at Commerce Bank in Philadelphia from in or about February 2006, to in or about March 2006; and at First Penn Bank in Philadelphia from in or about April 2006, to in or about July 2006.

3. Nakeshia Simmons, charged elsewhere, worked as a teller at Wachovia Bank from in or about March 2005 to in or about June 2006.

4. Yvonne Ruffin, charged elsewhere, worked as a teller at Commerce Bank from in or about October 2005, to in or about August 2006.

5. In the course of their employment as bank tellers, Gladisha Echevarria, Nakeshia Simmons, and Yvonne Ruffin processed transactions involving checks on behalf of bank customers and had access to customers' bank account information, such as their names, addresses, account numbers, and account balances.

6. From in or about August 2004, to in or about September 2006, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendants

WILLIAM M. FORD,
a/k/a "Will,"
a/k/a "Chill,"
SHAWN EDWARDS,
a/k/a "Shiz,"
TIMOTHY VICTOR-CANTY,
a/k/a "T.I.,"
a/k/a "Black,"
CHRISTOPHER VICTOR-CANTY, and
ANDRE TAYLOR,
a/k/a "Dre"

conspired and agreed, together and with others known and unknown to the grand jury, including Gladisha Echevarria, Nakeshia Simmons, and Yvonne Ruffin, to commit offenses against the United States, that is, to knowingly execute, and attempt to execute, and aid and abet the execution of, a scheme to defraud Wachovia Bank, Commerce Bank, and First Penn Bank, and to obtain monies owned by and under the care, custody, and control of those banks by means of false and fraudulent pretenses, representations, and promises, in violation of Title 18, United

States Code, Sections 1344 and 2, and to knowingly and without lawful authority possess, transfer, and use, and aid and abet the possession, transfer, and use of, 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

7. It was part of the conspiracy that Gladisha Echevarria, Nakeshia Simmons, and Yvonne Ruffin secretly made copies of legitimate checks that they processed on behalf of customers at the banks where they worked, as well as bank customers' account information, including their names, account numbers, dates of birth, social security numbers, and account balances, and provided the copies of checks and account holder information to defendants WILLIAM M. FORD, SHAWN EDWARDS, TIMOTHY VICTOR-CANTY, CHRISTOPHER VICTOR-CANTY, and ANDRE TAYLOR, who did not work at the banks, so that they could use the compromised information to obtain counterfeit and unauthorized checks that they used to steal money from Wachovia Bank, Commerce Bank, and First Penn Bank. Through these methods, the co-conspirators defrauded and attempted to defraud the banks of over \$170,000.

It was further a part of the conspiracy that:

8. Defendants WILLIAM M. FORD and SHAWN EDWARDS collected the check copies and bank customer account information from the collusive bank tellers and paid them in cash for their work.

9. Defendant WILLIAM M. FORD gathered the copies of the legitimate checks and used them to make bogus checks that looked like the legitimate checks but had different check numbers, different dollar amounts, and the names of people involved in the

scheme inserted in the payee lines. Each of the newly produced checks contained a forged and unauthorized signature.

10. Defendants WILLIAM M. FORD, SHAWN EDWARDS, TIMOTHY VICTOR-CANTY, CHRISTOPHER VICTOR-CANTY, and ANDRE TAYLOR, and others known and unknown to the grand jury then recruited people to take the checks into the banks and cash them. Defendants TIMOTHY VICTOR-CANTY and ANDRE TAYLOR also cashed bogus checks themselves.

11. Sometimes defendant WILLIAM M. FORD supplied cash to the check cashers so that they could open an account at the bank where the bogus checks were to be cashed, in order to make the bank less suspicious of the check cashers when they later came in to cash the bogus checks defendant FORD supplied.

12. Defendants SHAWN EDWARDS, TIMOTHY VICTOR-CANTY, CHRISTOPHER VICTOR-CANTY, ANDRE TAYLOR, and others known and unknown to the grand jury then drove the check cashers to the banks to cash the bogus checks provided by defendant WILLIAM M. FORD.

13. The check cashers cashed the bogus checks. Sometimes they were instructed to present the bogus checks to particular collusive bank tellers, such as Nakeshia Simmons and Yvonne Ruffin, who knowingly cashed the bogus checks for them.

14. The proceeds from these bogus checks were divided between defendant WILLIAM M. FORD, other co-conspirators involved in cashing the particular checks, the check casher, the collusive bank teller who cashed the check, if there was one, and the person who drove the check casher to the bank.

15. Defendant WILLIAM M. FORD also gathered the bank customer account information compromised by Gladisha Echevarria, Nakeshia Simmons, and Yvonne Ruffin, which included account holder names, account numbers, dates of birth, social security numbers, and account balances. He then obtained fake identifications in the names of the true bank customers paired with the photographs of the people who had been recruited to cash bogus checks, and he obtained bogus checks that were made out to the true bank customers.

16. Defendant WILLIAM M. FORD arranged for others known and unknown to the grand jury to drive the check cashers to the banks to cash the bogus checks he provided that were made payable to the real account holders and to make withdrawals from the real account holders' accounts. The check cashers presented the bogus checks made out to the real bank customers, along with the fake identifications in the name of the real bank customers that contained the photographs of the check cashers, and cashed the checks. Each of the checks contained a forged and unauthorized signature. The check cashers also made and attempted to make cash withdrawals from the accounts of the real bank customers they pretended to be.

17. The proceeds from these bogus checks and the withdrawals were divided between defendant WILLIAM M. FORD, the check casher, the collusive bank teller who cashed the check or processed the withdrawal, if there was one, and the person who drove the check casher to the bank.

OVERT ACTS

In furtherance of the conspiracy and to accomplish its objects, defendants WILLIAM M. FORD, SHAWN EDWARDS, TIMOTHY VICTOR-CANTY, CHRISTOPHER VICTOR-CANTY, and ANDRE TAYLOR, as well as Gladisha Echevarria, Nakeshia Simmons, Yvonne Ruffin, and others, committed the following overt acts, among others, in the Eastern District of Pennsylvania and elsewhere:

1. From on or about August 2004, to in or about December 2004, defendant CHRISTOPHER VICTOR-CANTY recruited Gladisha Echevarria to participate with him and defendant WILLIAM M. FORD in a scheme to steal information from banks so that they could use it to cash bogus checks at the banks.

2. From in or about December 2004, to in or about August 2005, Gladisha Echevarria copied approximately 20 to 30 legitimate checks that she processed as a teller at Wachovia Bank and provided them to defendant WILLIAM M. FORD so that he could use them as a template to make bogus checks that he had others cash. Defendant FORD paid Echevarria approximately \$50 for each of these checks.

3. From in or about January 2005, to in or about August 2005, Gladisha Echevarria copied up to approximately fifteen Wachovia Bank customer account profiles per week, which included the customers' names, addresses, social security numbers, dates of birth, account numbers, account balances, and driver's license numbers, and provided them to defendant WILLIAM M. FORD so that he and others could use them to cash checks against the accounts and make withdrawals from the accounts. Defendant FORD paid Echevarria approximately \$100 per bank customer profile.

4. From in or about February 2006, to in or about March 2006, Gladisha Echevarria copied approximately ten checks that she processed as a teller at Commerce Bank and provided them to defendant WILLIAM M. FORD so that he could use them as a template to make bogus checks that he had others cash. Defendant FORD paid Echevarria approximately \$50 for each of these checks.

5. From in or about August 2004, to in or about March 2006, defendant CHRISTOPHER VICTOR-CANTY recruited and drove check cashers to banks to cash bogus checks supplied by defendant WILLIAM M. FORD.

6. From in or about May 2006, to in or about July 2006, Gladisha Echevarria copied approximately 20 to 30 checks per week that she processed as a teller at First Penn Bank and provided them to defendant WILLIAM M. FORD so that he could use them as a template to make bogus checks. Defendant FORD paid Echevarria approximately \$50 for each of these checks.

7. From on or about June 23, 2006, through on or about July 17, 2006, at Commerce Bank and First Penn Bank, people working for defendant WILLIAM M. FORD cashed and attempted to cash at least 26 bogus checks that were counterfeit and unauthorized versions of the checks compromised by Gladisha Echevarria totaling over \$30,000.

8. From in or about September 2005, to in or about June 2006, Nakeshia Simmons copied approximately fifteen checks that she processed as a teller at Wachovia Bank and provided them to defendant WILLIAM M. FORD so that he could use them as a template to make bogus checks that he had others cash. Defendant FORD paid Simmons approximately \$50 to \$100 for each of these checks.

9. From in or about September 2005, to in or about June 2006, Nakeshia Simmons copied at least 20 Wachovia Bank customer account profiles, which included the customers' names, addresses, social security numbers, dates of birth, account numbers, and account balances, and provided them to defendant WILLIAM M. FORD so that he and others could use them to cash checks against the accounts and make withdrawals from the accounts. Defendant FORD paid Simmons approximately \$50 to \$100 per bank customer profile.

10. From in or about September 2005, to in or about June 2006, Nakeshia Simmons knowingly cashed approximately five to six bogus checks for the check cashers that defendant WILLIAM M. FORD sent into her bank branch. Defendant FORD called her to tell her the check casher was coming to her, and told Simmons the check casher's name. Defendant FORD paid Simmons approximately \$500 per check that she cashed.

11. From in or about March 2006, to in or about August 2006, Yvonne Ruffin copied approximately two checks that she processed as a teller at Commerce Bank and provided them to defendant SHAWN EDWARDS. Defendant EDWARDS in turn provided them to defendant WILLIAM M. FORD so that he could use them as a template to make bogus checks that he had others cash. Defendant FORD paid defendant EDWARDS for each of these checks, and defendant EDWARDS in turn paid Ruffin.

12. From in or about March 2006, to in or about August 2006, Yvonne Ruffin copied approximately one to two Commerce Bank customer account profiles, which included the customers' names, addresses, dates of birth, account numbers, and account balances, and provided them to defendants WILLIAM M. FORD and SHAWN EDWARDS so that they and others could use them to cash checks against the accounts and make withdrawals from the accounts.

13. From in or about March 2006, to in or about August 2006, defendants SHAWN EDWARDS, TIMOTHY VICTOR-CANTY, and ANDRE TAYLOR drove to Commerce Bank and presented to Yvonne Ruffin approximately twelve bogus checks, which she knowingly cashed for them. Defendant EDWARDS called her in advance to tell her that he and defendants TIMOTHY VICTOR-CANTY and TAYLOR were coming to her branch. Ruffin cashed these checks for a total of approximately \$11,600. Defendant FORD split the proceeds of these checks with defendants EDWARDS, TIMOTHY VICTOR-CANTY, and TAYLOR.

14. From in or about March 2005, to in or about September 2006, defendant ANDRE TAYLOR recruited and drove check cashers to the banks to cash the bogus checks provided to him by defendant WILLIAM M. FORD.

15. From in or about March 2006, to in or about July 2006, defendant TIMOTHY VICTOR-CANTY recruited and drove check cashers to the banks to cash the bogus checks provided to him by defendant WILLIAM M. FORD

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

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 through 5 and 7 through 17, and Overt Acts 1 through 15 of Count One are incorporated here.

2. From in or about March 2005, through in or about June 2006, in the Eastern District of Pennsylvania, and elsewhere, defendant

**WILLIAM M. FORD,
a/k/a “Will,”
a/k/a “Chill,” and
ANDRE TAYLOR,
a/k/a “Dre”**

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. Defendants WILLIAM M. FORD and ANDRE TAYLOR, and others known and unknown to the grand jury, obtained bogus checks that were supposedly drawn upon Wachovia Bank accounts, and other banks’ accounts, and cashed them and attempted to cash them at Wachovia Bank, and made withdrawals from real Wachovia Bank customer accounts, thereby defrauding and attempting to defraud Wachovia Bank of approximately \$72,000.

In violation of Title 18, United States Code, Sections 1344, 1349, and 2.

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 through 5 and 7 through 17, and Overt Acts 1 through 15 of Count One are incorporated here.

2. From in or about June 2004, through in or about September 2006, in the Eastern District of Pennsylvania, and elsewhere, defendants

WILLIAM M. FORD,
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SHAWN EDWARDS,
a/k/a “Shiz,”
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a/k/a “T.I.,”
a/k/a “Black,” and
ANDRE TAYLOR,
a/k/a “Dre”

knowingly executed, attempted to execute, and aided and abetted the execution of, a scheme to defraud Commerce 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. Defendants WILLIAM M. FORD, SHAWN EDWARDS, TIMOTHY VICTOR-CANTY, and ANDRE TAYLOR, and others known and unknown to the grand jury, obtained bogus checks that were supposedly drawn upon Commerce Bank accounts, and other banks’ accounts, and cashed them and attempted to cash them at Commerce Bank, thereby defrauding and attempting to defraud Commerce Bank of approximately \$77,000.

In violation of Title 18, United States Code, Sections 1344, 1349, and 2.

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 through 5 and 7 through 17, and Overt Acts 1 through 15 of Count One are incorporated here.

2. From in or about May 2006, through in or about July 2006, in the Eastern District of Pennsylvania, and elsewhere, defendants

**WILLIAM M. FORD,
a/k/a "Will,"
a/k/a "Chill,"
TIMOTHY VICTOR-CANTY,
a/k/a "T.I.,"
a/k/a "Black," and
ANDRE TAYLOR,
a/k/a "Dre"**

knowingly executed, attempted to execute, and aided and abetted the execution of, a scheme to defraud First Penn 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. Defendants WILLIAM M. FORD, TIMOTHY VICTOR-CANTY, and ANDRE TAYLOR, and others known and unknown to the grand jury, obtained bogus checks that were supposedly drawn upon First Penn Bank accounts, and other banks' accounts, and cashed them and attempted to cash them at First Penn Bank, thereby defrauding and attempting to defraud First Penn Bank of approximately \$23,000.

In violation of Title 18, United States Code, Sections 1344, 1349, and 2.

COUNTS FIVE THROUGH TWELVE

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 through 5 and 7 through 17, and Overt Acts 1 through 15 of Count One are incorporated here.
2. On or about the following dates, in the Eastern District of Pennsylvania, and elsewhere, defendants

**WILLIAM M. FORD,
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SHAWN EDWARDS,
a/k/a "Shiz,"
TIMOTHY VICTOR-CANTY,
a/k/a "T.I.,"
a/k/a "Black,"
ANDRE TAYLOR,
a/k/a "Dre"**

knowingly and without lawful authority possessed, transferred, and used, and aided and abetted the possession, transfer, and use of, a means of identification of another person, that is, the names and signatures of the people with signature authority on the following bank accounts, identified below, during and in relation to a bank fraud, each transaction constituting a separate count:

COUNT	Date Counterfeit Check was Cashed	Amount of Counterfeit Check	Initials of Account Holder	Initials of Person with Signature Authority
5	6/23/2006	\$986.44	B.R.	M.G.
6	6/23/2006	\$984.78	B.R.	M.G.
7	7/11/2006	\$987.41	St. R.C.	J.G.
8	7/11/2006	\$985.29	St. R.C.	J.G.

COUNT	Date Counterfeit Check was Cashed	Amount of Counterfeit Check	Initials of Account Holder	Initials of Person with Signature Authority
9	7/17/2006	\$984.36	St. R.C.	J.G.
10	7/17/2006	\$982.67	St. R.C.	J.G.
11	7/17/2006	\$989.31	St. R.C.	J.G.
12	7/17/2006	\$982.18	St. R.C.	J.G.

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

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

1. As a result of the violations of Title 18, United States Code, Sections 371, 1344, and 2, set forth in this indictment, defendants

**WILLIAM M. FORD,
a/k/a “Will,”
a/k/a “Chill,”
SHAWN EDWARDS,
a/k/a “Shiz,”
TIMOTHY VICTOR-CANTY,
a/k/a “T.I.,”
a/k/a “Black,”
CHRISTOPHER VICTOR-CANTY, and
ANDRE TAYLOR,
a/k/a “Dre”**

shall forfeiture to the United States of America any property 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 \$170,000.

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, Sections 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

**MICHAEL L. LEVY
UNITED STATES ATTORNEY**