

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

UNITED STATES OF AMERICA	:	DATE FILED: _____
v.	:	CRIMINAL NO. _____
DARNELL GREENE	:	VIOLATIONS:
a/k/a "Tyrone Green,"	:	18 U.S.C. § 1029(a)(2) (access device fraud - 1 count)
a/k/a "Robert Williams"	:	18 U.S.C. § 1029(b)(2) (conspiracy to commit access device fraud - 1 count)
	:	18 U.S.C. § 1029(a)(1) (access device fraud - 3 counts)
	:	18 U.S.C. § 1028A (aggravated identity theft - 4 counts)

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

From on or about April 19, 2008 through on or about April 10, 2009, in the Eastern District of Pennsylvania and elsewhere, defendant

**DARNELL GREENE,
a/k/a "Tyrone Green,"
a/k/a "Robert Williams"**

knowingly and with the intent to defraud used and attempted to use unauthorized access devices, that is, credit/debit card accounts belonging to J.B., E.M., I.R, and others to obtain and attempt to obtain things of value aggregating \$1,000 or more during a one-year period, thereby affecting interstate commerce.

In violation of Title 18, United States Code, Section 1029(a)(2), (b)(1) and (c)(1)(A)(i).

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

At all times material to this indictment:

1. California Pizza Kitchen (“CPK”), was a restaurant operating in Plymouth Meeting, Pennsylvania.

2. Person #1, an individual known to the grand jury, worked at CPK.

3. From in or about June, 2008, through in or about September, 2008, in the Eastern District of Pennsylvania and elsewhere, defendant

**DARNELL GREENE,
a/k/a “Tyrone Green,”
a/k/a “Robert Williams”**

conspired and agreed, with others known and unknown to the grand jury, to commit an offense against the United States, that is, to knowingly and with intent to defraud, use and traffic in counterfeit and unauthorized credit/debit card numbers in violation of Title 18, United States Code, Sections 1029(a)(1) and (2).

MANNER AND MEANS

It was part of the conspiracy that:

4. Defendant DARNELL GREENE provided Person #1 with a credit card “skimming” device that Person #1 could use to steal credit card numbers of persons who patronized CPK.

5. Using the skimming device provided to her by defendant DARNELL GREENE, Person #1 stole credit/debit card account numbers from CPK customers as they paid their CPK bills at the restaurant.

6. From time to time, Person #1 then provided the skimming device containing the stolen credit/debit card numbers obtained from CPK customers to defendant DARNELL GREENE.

7. Unauthorized charges were made on the stolen credit/debit card accounts given to defendant DARNELL GREENE.

OVERT ACTS

In furtherance of the conspiracy, the defendant, and others known and unknown to the grand jury, committed the following overt acts in the Eastern District of Pennsylvania and elsewhere:

1. In or about early July, 2008, defendant DARNELL GREENE provided Person #1 with a credit card skimming device.

2. From in or about early July, 2008 to on or about August 20, 2008, in Plymouth Meeting, Pennsylvania, using the credit card skimming device provided by defendant DARNELL GREENE, Person #1 skimmed credit/debit card account numbers from unsuspecting CPK customers.

3. From in or about July, 2008 to on or about August 20, 2008, in Philadelphia, Pennsylvania, Person #1 on several occasions turned over the credit card skimming device, which contained skimmed credit/debit card account numbers, to defendant DARNELL GREENE.

4. From in or about July, 2008 to on or about August 20, 2008, in Philadelphia, Pennsylvania, DARNELL GREENE paid Person #1 on several occasions for the skimmed credit/debit card account numbers.

5. From July, 2008 to September, 2008, defendant DARNELL GREENE caused unauthorized charges to be made on skimmed credit/debit card accounts.

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

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 21, 2008, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**DARNELL GREENE,
a/k/a “Tyrone Green,”
a/k/a “Robert Williams”**

knowingly and with the intent to defraud used and attempted to use a counterfeit access device, that is, a counterfeit credit card in the name of “Tyrone Green” but with the true Citibank Mastercard account number of victim “J.B.” (last four digits 9451), thereby affecting interstate and foreign commerce.

In violation of Title 18, United States Code, Sections 1029(a)(1), (b)(1) and 2.

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 21, 2008, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**DARNELL GREENE,
a/k/a “Tyrone Green,”
a/k/a “Robert Williams”**

knowingly and without lawful authority possessed and used a means of identification of another person, that is, an account number belonging to “J.B.,” during and in relation to access device fraud.

In violation of Title 18, United States Code, Sections 1028A(a)(1) and (c)(4).

COUNT FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 21, 2008, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**DARNELL GREENE,
a/k/a “Tyrone Green,”
a/k/a “Robert Williams”**

knowingly and without lawful authority possessed and used a means of identification of another person, that is, a Pennsylvania driver’s license number belonging to “S.S.”, during and in relation to access device fraud.

In violation of Title 18, United States Code, Sections 1028A(a)(1) and (c)(4).

COUNT SIX

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 23, 2008, in Abington Township, Montgomery County, in the Eastern District of Pennsylvania, defendant

**DARNELL GREENE,
a/k/a “Tyrone Green,”
a/k/a “Robert Williams”**

knowingly and with the intent to defraud used and attempted to use a counterfeit access device, that is, a counterfeit credit card in the name of “Tyrone Green” but with the true Freedom Credit Union Visa account number of victim “E.M.” (last four digits 3462), thereby affecting interstate and foreign commerce.

In violation of Title 18, United States Code, Sections 1029(a)(1), (b)(1) and 2.

COUNT SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 23, 2008, in Abington Township, Montgomery County, in the Eastern District of Pennsylvania, defendant

**DARNELL GREENE,
a/k/a “Tyrone Green,”
a/k/a “Robert Williams”**

knowingly and without lawful authority possessed and used a means of identification of another person, that is, an account number belonging to “E.M.,” during and in relation to access device fraud.

In violation of Title 18, United States Code, Sections 1028A(a)(1) and (c)(4).

COUNT EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 10, 2009, in Abington Township, Montgomery County, in the Eastern District of Pennsylvania, defendant

**DARNELL GREENE,
a/k/a “Tyrone Green,”
a/k/a “Robert Williams”**

knowingly and with the intent to defraud used and attempted to use a counterfeit access device, that is, a counterfeit credit card in the name of “Robert Williams” but with the true Wachovia Visa account number of victim “I.R.” (last four digits 4019), thereby affecting interstate and foreign commerce.

In violation of Title 18, United States Code, Sections 1029(a)(1), (b)(1) and 2.

COUNT NINE

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 10, 2009, in Abington Township, Montgomery County, in the Eastern District of Pennsylvania, defendant

**DARNELL GREENE,
a/k/a “Tyrone Green,”
a/k/a “Robert Williams”**

knowingly and without lawful authority possessed and used a means of identification of another person, that is, an account number belonging to “I.R.,” during and in relation to access device fraud.

In violation of Title 18, United States Code, Sections 1028A(a)(1) and (c)(4).

GRAND JURY FOREPERSON

MICHAEL L. LEVY
United States Attorney