

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

UNITED STATES OF AMERICA : **CRIMINAL NO. 10-**
v. : **DATE FILED: March 11, 2010**
TALAYAH LITTLE : **VIOLATIONS:**
: **18 U.S.C. § 371 (conspiracy - 1 count)**
: **18 U.S.C. § 1344 (bank fraud - 1 count)**
: **18 U.S.C. § 1028A (aggravated identity**
: **theft - 11 counts)**
: **18 U.S.C. § 2 (aiding and abetting)**
: **Notice of forfeiture**

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

At all times material to this indictment:

1. TD Bank was a financial institution, the deposits of which were insured by the Federal Deposit Insurance Corporation, certificate number 21140.

2. Defendant TALAYAH LITTLE was employed as a switchboard operator for TD Bank in Mount Laurel, New Jersey, where she had access to certain information for the bank's customers, including names, addresses and driver's license numbers.

3. From on or about January 19, 2009 to on or about March 26, 2009, in the Eastern District of Pennsylvania and elsewhere, defendant

TALAYAH LITTLE

conspired and agreed, with others known and unknown to the grand jury, to commit offenses against the United States, that is, to knowingly execute and attempt to execute a scheme to

defraud TD Bank, in violation of Title 18, United States Code, Section 1344, and to knowingly and without lawful authority use a means of identification of another person, during and in relation to a bank fraud, in violation of Title 18, United States Code, Section 1028A(a)(1), and (c)(5).

MANNER AND MEANS

4. Defendant TALAYAH LITTLE and her co-conspirators used stolen personal identifying and account information to make fraudulent withdrawals from victims' TD Bank accounts.

5. Defendant TALAYAH LITTLE was recruited by Co-Conspirator 1, a person known to the grand jury, to provide personal identifying and bank account information, such as driver's license numbers, account numbers, account balances, and dates of last account deposits, of TD Bank account holders.

6. Defendant TALAYAH LITTLE used her position with TD Bank to improperly access computerized information for TD Bank account holders, such as the account holders' driver's license numbers, and recruited TD Bank employee and co-conspirator A.W., known to the grand jury and charged elsewhere, to use her position at TD Bank to improperly access computerized account information for TD Bank account holders, such as account numbers, account balances and dates of last deposits, which information A.W. provided to defendant LITTLE. Defendant LITTLE then passed on to Co-Conspirator 1 the information improperly accessed by A.W. and defendant LITTLE, including victims' driver's license numbers and bank account information.

7. Co-Conspirator 1 provided the stolen TD Bank account holder information to other individuals, known and unknown to the grand jury, involved in the scheme who arranged for the manufacture false photographic identifications in the name of those customers of TD Bank. The false identification contained the picture of M.A. and B.C., individuals known to the grand jury and charged elsewhere, and other individuals unknown to the grand jury, who were recruited to act as “check runners” for use in the making of fraudulent withdrawals from the accounts of those TD Bank account holders.

8. Armed with false identification and the TD Bank customers’ account numbers, M.A., B.C., and other unknown check-runners posed as TD Bank account holders to make withdrawals in the names of those customers, totaling more than approximately \$213,000.

OVERT ACTS

In furtherance of the conspiracy, defendant TALAYAH LITTLE and her co-conspirators committed the following overt acts in the Eastern District of Pennsylvania and elsewhere:

1. Between on or about January 19, 2009 and on or about March 9, 2009, defendant TALAYAH LITTLE provided Co-Conspirator 1 with the bank account and personal information of approximately thirteen TD Bank account holders, all residents of the Eastern District of Pennsylvania, including driver’s license numbers, bank account numbers, account balances, and dates of last account deposits. The account information had been given to defendant LITTLE by co-conspirator A.W.

2. Between on or about January 19, 2009 and on or about March 26, 2009, Co-Conspirator 1 provided the account and personal information received from defendant

TALAYAH LITTLE to individuals, known and unknown to the grand jury, who used that information to acquire approximately \$213,000 from TD Bank by transporting M.A., B.C. and others unknown to the grand jury from Philadelphia, Pennsylvania to New Jersey and New York to make fraudulent withdrawals from TD Bank by presenting withdrawal slips with the account number of, and fraudulent identification in the name of, the account holders to TD Bank tellers.

On or about the dates listed below, the conspirators caused the following withdrawals and attempted withdrawals from the accounts of victims at TD Bank:

<u>OVERT ACT</u>	<u>DATE</u>	<u>LOCATION</u>	<u>ACCOUNT HOLDER</u>	<u>AMOUNT OF WITHDRAWAL</u>
3	02/05/09	Cherry Hill, NJ	R.Ra.	\$4,000
4	02/05/09	Atlantic City, NJ	E.F.	\$6,000
5	02/06/09	Atlantic City, NJ	E.F.	\$6,000
6	02/07/09	Atlantic City, NJ	E.F.	\$7,000
7	02/10/09	Atlantic City, NJ	E.F.	\$8,000
8	02/13/09	Atlantic City, NJ	E.F.	\$6,000
9	02/14/09	Atlantic City, NJ	E.F.	\$6,000
10	02/17/09	Atlantic City, NJ	E.F.	\$6,000
11	02/18/09	Turnersville, NJ	E.F.	\$6,000
12	02/19/09	Turnersville, NJ	E.F.	\$6,000
13	02/20/09	Atlantic City, NJ	E.F.	\$6,000
14	02/20/09	Williamstown, NJ	E.M.	\$6,000
15	02/21/09	Atlantic City, NJ	E.F.	\$6,100
16	02/21/09	Williamstown, NJ	E.M.	\$6,000

<u>OVERT ACT</u>	<u>DATE</u>	<u>LOCATION</u>	<u>ACCOUNT HOLDER</u>	<u>AMOUNT OF WITHDRAWAL</u>
17	02/22/09	Atlantic City, NJ	E.F.	\$6,000
18	02/24/09	Turnersville, NJ	E.F.	\$6,200
19	02/25/09	Turnersville, NJ	E.F.	\$6,000
20	02/26/09	Atlantic City, NJ	E.F.	\$6,500
21	02/27/09	Atlantic City, NJ	E.F.	\$7,000
22	02/28/09	Atlantic City, NJ	E.F.	\$8,000
23	03/01/09	Atlantic City, NJ	E.F.	\$8,000
24	03/03/09	Atlantic City, NJ	E.F.	\$8,000
25	03/11/09	New York, NY	M.F.	\$6,000
26	03/13/09	New York, NY	M.F.	\$2,100
27	03/11/09	New York, NY	M.S.	\$4,000
28	03/11/09	New York, NY	K.M.	\$6,000
29	03/13/09	New York, NY	K.M.	\$6,000
30	03/11/09	New York, NY	R.J.	\$6,000
31	03/13/09	New York, NY	R.J.	\$7,000
32	03/18/09	New York, NY	S.S.	\$6,300
33	03/18/09	New York, NY	R.Ru.	\$6,000
34	03/18/09	New York, NY	R.Ru.	\$6,000 attempt
35	03/25/09	Cape May Courthouse, NJ	T.H.	\$3,025
36	03/25/09	Wildwood, NJ	B.T.	\$6,000 attempt
37	03/26/09	West Deptford, NJ	J.T.	\$4,200
38	03/26/09	Mullica Hill, NJ	D.A.	\$4,200 attempt

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

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1, 2 and 4 through 8 and overt acts 1 through 38 of Count One are realleged here.

2. From on or about January 19, 2009 to on or about March 26, 2009, in the Eastern District of Pennsylvania and elsewhere, defendant

TALAYAH LITTLE

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 TD Bank by means of materially 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 A.W., improperly acquired personal and account information for TD Bank accounts belonging to R.Ra., E.F., M.F., M.S., K.M., R.J., S.S., R.Ru., D.A., T.H., J.T., B.T., and E.M.

4. Defendant TALAYAH LITTLE then provided that personal and account information to Co-Conspirator 1, who, with others, used it to fraudulently take, and attempt to take, approximately \$213,000 from TD Bank by making fraudulent withdrawals from accounts belonging to, R.Ra., E.F., M.F., M.S., K.M., R.J., S.S., R.Ru., D.A., T.H., J.T., B.T., and E.M.

5. In furtherance of the scheme, M.A., B.C. and the other unknown check runners were transported from Philadelphia, Pennsylvania to TD Bank branches in New Jersey and New York and made or attempted to make the following fraudulent withdrawals:

<u>DATE</u>	<u>LOCATION</u>	<u>ACCOUNT HOLDER</u>	<u>AMOUNT OF WITHDRAWAL</u>
02/05/09	Cherry Hill, NJ	R.Ra.	\$4,000
02/05/09	Atlantic City, NJ	E.F.	\$6,000
02/06/09	Atlantic City, NJ	E.F.	\$6,000
02/07/09	Atlantic City, NJ	E.F.	\$7,000
02/10/09	Atlantic City, NJ	E.F.	\$8,000
02/13/09	Atlantic City, NJ	E.F.	\$6,000
02/14/09	Atlantic City, NJ	E.F.	\$6,000
02/17/09	Atlantic City, NJ	E.F.	\$6,000
02/18/09	Turnersville, NJ	E.F.	\$6,000
02/19/09	Turnersville, NJ	E.F.	\$6,000
02/20/09	Atlantic City, NJ	E.F.	\$6,000
02/20/09	Williamstown, NJ	E.M.	\$6,000
02/21/09	Atlantic City, NJ	E.F.	\$6,100
02/21/09	Williamstown, NJ	E.M.	\$6,000
02/22/09	Atlantic City, NJ	E.F.	\$6,000
02/24/09	Turnersville, NJ	E.F.	\$6,200
02/25/09	Turnersville, NJ	E.F.	\$6,000
02/26/09	Atlantic City, NJ	E.F.	\$6,500
02/27/09	Atlantic City, NJ	E.F.	\$7,000
02/28/09	Atlantic City, NJ	E.F.	\$8,000
03/01/09	Atlantic City, NJ	E.F.	\$8,000

<u>DATE</u>	<u>LOCATION</u>	<u>ACCOUNT HOLDER</u>	<u>AMOUNT OF WITHDRAWAL</u>
03/03/09	Atlantic City, NJ	E.F.	\$8,000
03/11/09	New York, NY	M.F.	\$6,000
03/13/09	New York, NY	M.F.	\$2,100
03/11/09	New York, NY	M.S.	\$4,000
03/11/09	New York, NY	K.M.	\$6,000
03/13/09	New York, NY	K.M.	\$6,000
03/11/09	New York, NY	R.J.	\$6,000
03/13/09	New York, NY	R.J.	\$7,000
03/18/09	New York, NY	S.S.	\$6,300
03/18/09	New York, NY	R.Ru.	\$6,000
03/18/09	New York, NY	R.Ru.	\$6,000 attempt
03/25/09	Cape May Courthouse, NJ	T.H.	\$3,025
03/25/09	Wildwood, NJ	B.T.	\$6,000 attempt
03/26/09	West Deptford, NJ	J.T.	\$4,200
03/26/09	Mullica Hill, NJ	D.A.	\$4,200 attempt

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

COUNTS THREE THROUGH THIRTEEN

THE GRAND JURY FURTHER CHARGES THAT:

From or about January 19, 2009 to on or about March 26, 2009, in the Eastern District of Pennsylvania and elsewhere, defendant

TALAYAH LITTLE

knowingly and without lawful authority, transferred, 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>
3	02/05/09	R.Ra.
4	02/05/09	E.F.
5	03/11/09	M.F.
6	03/11/09	M.S.
7	03/11/09	K.M.
8	03/18/09	S.S.
9	03/18/09	R.Ru.
10	03/25/09	T.H.
11	03/25/09	B.T.

12	03/26/09	J.T.
13	03/26/09	D.A.

All 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 and 1344, set forth in this indictment, defendant

TALAYAH LITTLE

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 information, including, but not limited to, the sum of \$197,425.

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:

GRAND JURY FOREPERSON

MICHAEL L. LEVY
United States Attorney