

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

**UNITED STATES OF AMERICA** : **DATE FILED:** \_\_\_\_\_  
**v.** : **CRIMINAL NO.** \_\_\_\_\_  
**CINQUETTA ROUSE** : **VIOLATIONS:**  
: **18 U.S.C. § 1029(b)(2) (conspiracy to**  
: **commit access device fraud - 1 count)**  
: **18 U.S.C. § 1028A (aggravated identity**  
: **theft - 2 counts)**  
: **18 U.S.C. § 2 (aiding and abetting)**

**INDICTMENT**

**COUNT ONE**

**THE GRAND JURY CHARGES THAT:**

At all times material to this indictment:

1. Best Buy Co., Inc., Richfield, Minnesota, operated Best Buy retail stores, which purchased and sold merchandise, including computers, televisions and other electronic products, throughout the United States, including various locations in the Philadelphia, Pennsylvania area.

2. From in or about November 6, 2008, to in or about November 15, 2008, in the Eastern District of Pennsylvania, defendant

**CINQUETTA ROUSE**

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 one or more counterfeit and unauthorized access devices, that is store accounts in the names of other

persons, to obtain anything of value aggregating \$1000 or more during a one year period, in violation of Title 18, United States Code, Section 1029(a)(2).

### **MANNER AND MEANS**

It was part of the conspiracy that:

3. Person Number 1 known to the grand jury (Person No. 1) obtained the names, addresses, social security numbers and dates of birth of S.J., J.M., R.S., and other victims, without their knowledge and consent, from persons known and unknown to the grand jury.

4. Person No. 1 used the names and identifying information of the victims to obtain counterfeit driver's licenses in the names of those victims, but which contained the photographs of Melissa Mello, charged elsewhere, Sopheavy Sar, charged elsewhere, and other persons unknown to the grand jury.

5. At the direction of Person No. 1, Melissa Mello and Sopheavy Sar applied for lines of credit at different stores, including the Best Buy in Willow Grove, Pennsylvania. Melissa Mello and Sopheavy Sar completed applications using the names, addresses, social security numbers and dates of birth of the individuals which had been provided to them by Person No. 1, and by using as identification the counterfeit driver's licenses in the names of these individuals, which had also been provided to them by Person No. 1.

6. At the direction of Person No. 1, defendant CINQUETTA ROUSE, an employee at the Best Buy in Willow Grove, assisted Melissa Mello and Sopheavy Sar in opening lines of credit, knowing that Mello and Sar were using the names and identification of other persons, and were also using counterfeit driver's licenses in the names of those persons as identification, without their knowledge or consent.

7. At the direction of Person No. 1, defendant CINQUETTA ROUSE assisted Mello and Sar select merchandise requested by Person No. 1, knowing that Mello and Sar would be paying for the merchandise using accounts they had obtained using the identities of others, without the authorization or knowledge of those persons.

### **OVERT ACTS**

In furtherance of the conspiracy, defendant CINQUETTA ROUSE, Person No. 1, Melissa Mello, Sopheavy Sar and others known and unknown to the grand jury, committed the following overt acts, among others, in the Eastern District of Pennsylvania:

1. On or about November 6, 2008, at the Best Buy in Willow Grove, Pennsylvania, defendant CINQUETTA ROUSE, at the direction of Person No. 1, assisted Melissa Mello in opening a line of credit in the name of victim J.M., without the knowledge or consent of J.M.

2. On or about November 6, 2008, at the Best Buy in Willow Grove, Pennsylvania, defendant CINQUETTA ROUSE, at the direction of Person No. 1, assisted Melissa Mello select merchandise valued at \$2,755.98, knowing that Mello was going to purchase that merchandise using the fraudulent line of credit Mello had opened in the name of J.M.

3. On or about November 7, 2008, at the Best Buy in Willow Grove, Pennsylvania, defendant CINQUETTA ROUSE, at the direction of Person No. 1, assisted Melissa Mello select merchandise valued at \$1,536.98, knowing that Mello was going to purchase that merchandise using the fraudulent line of credit Mello had opened in the name of J.M.

4. On or about November 15, 2008, at the Best Buy in Willow Grove, Pennsylvania, defendant CINQUETTA ROUSE, at the direction of Person No. 1, assisted Sopheavy Sar in opening a line of credit in the name of victim R.S., without the knowledge or consent of R.S.

5. On or about November 15, 2008, at the Best Buy in Willow Grove, Pennsylvania, defendant CINQUETTA ROUSE, at the direction of Person No. 1, assisted Sopheavy Sar in selecting merchandise valued at \$3,908.41, knowing that Sar was going to purchase that merchandise using the fraudulent line of credit Sar had opened in the name of R.S.

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

**COUNT TWO**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about November 6, 2008, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**CINQUETTA ROUSE**

knowingly and without lawful authority possessed and used, and aided and abetted the possession and use of, a means of identification of another person, that is, the name of J.M., during and in relation to access device fraud.

In violation of Title 18, United States Code, Sections 1028A(a)(1) and (c)(4), and  
2.

**COUNT THREE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about November 15, 2008, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**CINQUETTA ROUSE**

knowingly and without lawful authority possessed and used, and aided and abetted the possession and use of, a means of identification of another person, that is, the name of R.S., during and in relation to access device fraud.

In violation of Title 18, United States Code, Sections 1028A(a)(1) and (c)(4) and 2.

**A TRUE BILL:**

**\_\_\_\_\_  
GRAND JURY FOREPERSON**

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MICHAEL L. LEVY  
UNITED STATES ATTORNEY**