

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

**UNITED STATES OF AMERICA** : **CRIMINAL NO. 10-**  
**v.** : **DATE FILED: April , 2010**  
**KEVIN JAMAL STRICKLAND** : **VIOLATIONS:**  
**PHILLIP MILES** : **18 U.S.C. § 371 (conspiracy – 1 count)**  
: **18 U.S.C. § 1344 (bank fraud – 2 counts)**  
: **18 U.S.C. § 513 (possessing and uttering**  
: **counterfeit checks – 4 counts)**  
: **18 U.S.C. § 2 (aiding and abetting)**  
: **Notice of Forfeiture**

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**INDICTMENT**

**COUNT ONE**

**THE GRAND JURY CHARGES THAT:**

At all times material to this indictment:

1. Labor Ready, Inc., (“Labor Ready”), now a subsidiary of TrueBlue, Inc., was a company that did business in interstate commerce in the Eastern District of Pennsylvania and elsewhere.
2. ATD-American Co. (“ATD”) was a company that did business in intersate commerce in the Eastern District of Pennsylvania and elsewhere.
3. U.S. Bank National Association (“US Bank”), Wachovia Bank (“Wachovia”) and Citizens Bank (“Citizens”) were financial institutions, the deposits of which were insured by the Federal Deposit Insurance Corporation (“FDIC”). US Banks’s FDIC certificate number was 6548. Wachovia’s FDIC certificate number was 33869, and Citizens’s FDIC certificate number was 57282.
4. Labor Ready had a business account at US Bank.

5. ATD had a business account at Wachovia.

6. From at least April 2006 through at least August 16, 2006, in the Eastern District of Pennsylvania, and elsewhere, defendants

**KEVIN JAMAL STRICKLAND  
and  
PHILLIP MILES**

conspired and agreed, together and with others known and unknown to the grand jury, to commit offenses against the United States, that is, the knowing execution of a scheme to defraud US Bank, Wachovia and Citizens, and to obtain monies owned by and under their care, custody, and control of US Bank, Wachovia and Citizens, by means of false and fraudulent pretenses, representations, and promises, in violation of Title 18, United States Code, Section 1344, and the uttering and possession of forged and counterfeit securities with intent to deceive of an organization operating in and affecting interstate commerce, in violation of Title 18, United States Code, Section 513(a).

**MANNER AND MEANS**

7. It was part of the conspiracy that defendants KEVIN JAMAL STRICKLAND and PHILLIP MILES cashed and attempted to cash counterfeit checks.

It was further part of the conspiracy that:

8. Defendant KEVIN JAMAL STRICKLAND manufactured counterfeit and forged checks that appeared to be drawn on the accounts of Labor Ready at US Bank.

9. Defendants KEVIN JAMAL STRICKLAND and PHILLIP MILES cashed counterfeit checks and gave counterfeit checks to other conspirators to cash.

10. When the counterfeit checks were successfully cashed, defendants KEVIN JAMAL STRICKLAND and PHILLIP MILES shared the proceeds of the fraudulently cashed checks.

### **OVERT ACTS**

In furtherance of the conspiracy and to accomplish its objects, defendants KEVIN JAMAL STRICKLAND and PHILLIP MILES committed the following overt acts, among others:

1. On or about August 8, 2006, defendant PHILLIP MILES deposited a counterfeit check drawn on ATD's account at Wachovia at a branch of Citizens in Philadelphia, in the Eastern District of Pennsylvania.

2. On or about August 16, 2006, defendant KEVIN JAMAL STRICKLAND, cashed a counterfeit check drawn on Labor Ready's account at US Bank.

3. On or about August 16, 2006, defendants KEVIN JAMAL STRICKLAND and PHILLIP MILES provided a counterfeit check drawn on Labor Ready's account at US Bank to Michael Easton, charged elsewhere, with the intent that Michael Easton deposit and/or cash the counterfeit check.

4. On or about August 16, 2006, defendant PHILLIP MILES possessed six counterfeit checks drawn on Labor Ready's account at US Bank, all in the amount of \$856.30, with an intent to deposit or cash, or to give to another conspirator to deposit or cash, the six counterfeit checks.

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

**COUNT TWO**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. Paragraphs 1 through 5 of Count One are re-alleged here.
2. From at least April 2006, until on or about August 16, 2006, in the Eastern

District of Pennsylvania, defendants

**KEVIN JAMAL STRICKLAND  
and  
PHILLIP MILES**

knowingly executed, attempted to execute, and aided and abetted the execution and attempted execution of, a scheme to defraud US Bank and to obtain monies owned by and under the care, custody, and control of US Bank by means of false and fraudulent pretenses, representations, and promises.

**THE SCHEME**

3. Defendants KEVIN JAMAL STRICKLAND and PHILLIP MILES manufactured and possessed counterfeit checks drawn on a Labor Ready account at US Bank.
4. On or about August 16, 2006, defendant KEVIN JAMAL STRICKLAND cashed a counterfeit check drawn on a Labor Ready account at US Bank, in the amount of \$852.93 and made payable to “Kevin Strickland.”
5. On or about August 16, 2006, defendants KEVIN JAMAL STRICKLAND and PHILLIP MILES provided Michael Easton, charged elsewhere, with a counterfeit check for \$856.30, made payable to Easton, drawn on a Labor Ready account at US Bank, with the intent that Easton deposit and/or cash the counterfeit check and share the proceeds with defendants STRICKLAND and MILES.

6. On or about August 16, 2006, defendant PHILLIP MILES possessed six counterfeit checks drawn on Labor Ready's account at US Bank, all in the amount of \$856.30, with an intent to deposit or cash, or to give to another conspirator to deposit or cash, the six counterfeit checks.

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

**COUNT THREE**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. Paragraphs 1 through 5 of Count One are re-alleged here.
2. From at least April 2006, until on or about August 16, 2006, in the Eastern

District of Pennsylvania, defendants

**KEVIN JAMAL STRICKLAND  
and  
PHILLIP MILES**

knowingly executed, attempted to execute, and aided and abetted the execution and attempted execution of a scheme to defraud Citizens and Wachovia and to obtain monies owned by and under the care, custody, and control of Citizens and Wachovia by means of false and fraudulent pretenses, representations, and promises.

**THE SCHEME**

3. Defendants KEVIN JAMAL STRICKLAND and PHILLIP MILES manufactured and possessed counterfeit checks drawn on an ATD account at Wachovia.
4. On or about August 8, 2006, defendant PHILLIP MILES deposited a counterfeit check drawn on an ATD account at Wachovia at a branch of Citizens in Philadelphia, in the Eastern District of Pennsylvania, in the amount of \$4,457.68 and made payable to "Philip Miles."

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

**COUNTS FOUR THROUGH SIX**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. Paragraphs 1 through 5 of Count One are re-alleged here.
2. On or about the dates listed below, each instance constituting a separate

count, in the Eastern District of Pennsylvania, and elsewhere, defendants

**KEVIN JAMAL STRICKLAND  
and  
PHILLIP MILES**

with intent to deceive, knowingly made, uttered and possessed, and aided and abetted the making, uttering and possessing of, forged and counterfeit securities of an organization operating in and affecting interstate commerce, that is, the checks listed below, drawn on the accounts held at the banks indicated.

<b>Count</b>	<b>Date</b>	<b>Account Holder</b>	<b>Issuing Bank</b>	<b>Approx.Amo unt</b>
4	8/8/06	ATD	Wachovia	\$4,457.68
5	8/16/06	Labor Ready	US Bank	\$856.30
6	8/16/06	Labor Ready	US Bank	\$852.93

In violation of Title 18, United States Code, Sections 513(a) and 2.

**COUNT SEVEN**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. Paragraphs 1 through 5 of Count One are re-alleged here.
2. On or about August 16, 2006, in the Eastern District of Pennsylvania,

defendants

**KEVIN JAMAL STRICKLAND  
and  
PHILLIP MILES**

with intent to deceive, knowingly possessed, and aided and abetted the possession of, forged and counterfeit securities of an organization operating in and affecting interstate commerce, that is, six counterfeit checks drawn on Labor Ready's account at US Bank, all in the amount of \$856.30.

In violation of Title 18, United States Code, Sections 513(a) and 2.

## NOTICE OF FORFEITURE

1. As a result of the violations of Title 18, United States Code, Sections 513 and 1344, described in this indictment, defendants

**KEVIN JAMAL STRICKLAND  
and  
PHILLIP MILES**

shall forfeit to the United States of America:

(a) any property used or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such offenses, including, but not limited to:

- (i) A Dell Inspiron computer, serial number 4NBD511;
- (ii) A Gateway NLX computer, serial number 0020792300;
- (iii) Four CD Roms;
- (iv) One 1GB Lexar Thumb Drive;
- (v) One 512 MB Pretec Thumb Drive;
- (vi) One 256 MB San Disk Flash Drive; and
- (vii) counterfeit United States Federal Reserve Notes, Social Security Cards, driver's licenses, and bank checks.

(b) any property, real or personal, which constitutes or is derived from proceeds traceable to any offense constituting "specified unlawful activity," that is, bank fraud, including, but not limited to the following:

- (i) The sum of \$6,166.93 in United States currency (forfeiture money judgment).

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 28, United States Code, Section 2461(c), 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, Sections 492 and 982(a), and Title 28, United States Code, Section 2461(c).

**A TRUE BILL:**

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**GRAND JURY FOREPERSON**

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**MICHAEL L. LEVY**  
**United States Attorney**