

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

UNITED STATES OF AMERICA	:	CRIMINAL NO. <u>11-_____</u>
v.		
ANTHONY WILLIAMS, a/k/a "Tone"	:	DATE FILED: <u>April 12, 2011</u>
WILLIE TIMMONS, a/k/a "Boo Boo"	:	VIOLATIONS:
WAYNE RAINEY, a/k/a "Pip"	:	18 U.S.C. § 371 (conspiracy - 1 count)
NATHAN WHITFIELD	:	18 U.S.C. § 1028(a)(7) (identity theft - 1 count)
JAMAL JENKINS	:	18 U.S.C. § 1028A(a)(1) (aggravated identity theft - 4 counts)
TYRONE GLENN	:	18 U.S.C. § 1029(a)(2) (use of one or more unauthorized access devices - 13 counts)
JENNIFER PEARSON	:	18 U.S.C. § 1344 (bank fraud - 3 counts)
AMINA HOLMES	:	18 U.S.C. § 2 (aiding and abetting)
TIMEEKA LOUD, a/k/a "Envy"	:	Notice of Forfeiture
COURTNEY CARR		
BRIAN WRIGHT	:	
KENDALL BROWN, JR.	:	
BARBARA FORREST	:	
ZACHARY ANDREWS	:	
KHARIM KILGORE	:	
ALPHONZO RICHARDSON	:	

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

1. From at least in or about April 2007, to in or about August 2010, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendants

**ANTHONY WILLIAMS,
a/k/a "Tone,"
WILLIE TIMMONS,
a/k/a "Boo Boo,"
WAYNE RAINEY,
a/k/a "Pip,"
NATHAN WHITFIELD,
JAMAL JENKINS,**

**TYRONE GLENN,
TIMEEKA LOUD,
a/k/a "Envy,"
KENDALL BROWN, JR., and
BARBARA FORREST**

conspired and agreed, with others known and unknown to the grand jury, to commit offenses against the United States, that is, to knowingly and with intent to defraud, use one or more unauthorized access devices 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), and to knowingly execute a scheme to defraud banks and obtain funds by false representations, in violation of Title 18, United States Code, Section 1344.

MANNER AND MEANS

It was part of the conspiracy that:

2. Defendant ANTHONY WILLIAMS obtained stolen identity information, including the names, dates of birth, social security numbers, and credit card account numbers of his victims, which he used to gain access to the credit card accounts of the victims, without their knowledge or consent.

3. Defendant ANTHONY WILLIAMS, once he gained access to the accounts, usually by making telephone calls to the financial institutions which issued the victims' credit cards, changed the addresses and contact telephone numbers on the accounts, added the names of others as additional account holders and had credit cards issued in their names, or had replacement cards issued in the names of the account holders and sent to the new addresses, all without the knowledge and consent of the account holders.

4. Defendants WILLIE TIMMONS, WAYNE RAINEY, NATHAN WHITFIELD, and others known and unknown to the grand jury, at the direction of defendant

ANTHONY WILLIAMS, recruited others, including defendants JAMAL JENKINS, TYRONE GLENN, KENDALL BROWN, JR., BARBARA FORREST, and others known and unknown to the grand jury, to obtain cash advances and make purchases with the credit cards which had been issued in their names on the victims' accounts, all without the knowledge and consent of the victims.

5. Defendants WAYNE RAINEY, NATHAN WHITFIELD, JAMAL JENKINS, TYRONE GLENN, TIMEEKA LOUD, KENDALL BROWN, JR., BARBARA FORREST, and others known and unknown to the grand jury, obtained cash advances and made purchases with the credit cards which had been issued in their names on the victims' accounts, all without the knowledge and consent of the victims.

OVERT ACTS

In furtherance of the conspiracy, the following overt acts were committed in the Eastern District of Pennsylvania and elsewhere:

1. On or about April 4, 2007, defendant NATHAN WHITFIELD fraudulently obtained a \$4,500 cash advance at Citizens Bank, Philadelphia, Pennsylvania, and a \$1,700 cash advance at Sovereign Bank, Philadelphia, Pennsylvania, purchased \$1,051 in merchandise at Nordstrom, King of Prussia, Pennsylvania, purchased \$2,984.50 in merchandise at Louis Vuitton, King of Prussia, Pennsylvania, and purchased \$1,682.70 in merchandise at Hugo Boss, King of Prussia, Pennsylvania, using a Discover Card issued in the name of defendant NATHAN WHITFIELD on the Discover Card account of victim "G. B.," account number ending in 9971.

2. On or about May 7, 2009, defendant KENDALL BROWN, JR. fraudulently obtained a cash advance of \$4,500 at Bank of America, Philadelphia, Pennsylvania, and a cash advance of \$4,959.99 at Harrah's Casino, Chester, Pennsylvania, using a Barclays

credit card issued in the name of defendant KENDALL BROWN, JR. on the Barclays credit card account of victim "J. F.," account number ending in 1025.

3. On or about July 15, 2009, defendant WAYNE RAINEY fraudulently obtained a cash advance of \$2,104.99 at Harrah's Casino, Chester, Pennsylvania, and a cash advance of \$1,700 at Sovereign Bank, Philadelphia, Pennsylvania, using a Barclays Bank credit card issued in the name of WAYNE RAINEY on the Barclays credit card account of victim "D. D.," ending in the numbers 1551.

4. On or about September 2, 2009, defendant BARBARA FORREST fraudulently obtained a cash advance of \$5,000 at Bank of America, Philadelphia, Pennsylvania, using a Barclays Bank credit card issued in the name of BARBARA FORREST on the Barclays credit card account of victim "F. M.," ending in the numbers 6952.

5. On or about September 16, 2009, defendant JAMAL JENKINS fraudulently purchased \$10,017 in merchandise at J. E. Caldwell, King of Prussia, Pennsylvania, using a Barclays Bank credit card issued in the name of defendant JAMAL JENKINS on the Barclays credit card account of victim "R. K.," account number ending in 2359.

6. On or about September 23, 2009, at a Bank of America branch in Philadelphia, Pennsylvania, defendant TYRONE GLENN unsuccessfully attempted to fraudulently obtain a cash advance using a Barclays Bank credit card issued in the name of TYRONE GLENN on the Barclay Card account of victim "R. K.," account number ending in 2359, that he was given by defendant WILLIE TIMMONS.

7. On or about August 4, 2010, at a Home Depot store in Warrington, Pennsylvania, defendant TIMEEKA LOUD purchased \$12,697.25 worth of materials using a Home Depot credit card fraudulently issued in the name of victim "V. G.," account number ending in 2348.

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

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 4, 2007, in the Eastern District of Pennsylvania and elsewhere,
defendants

**ANTHONY WILLIAMS,
a/k/a "Tone," and
NATHAN WHITFIELD,**

knowingly and with the intent to defraud, used, and aided and abetted the use of, an unauthorized access device, that is, a Discover credit card issued on the account of victim "G. B.," ending in the numbers 9971, 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, Sections 1029(a)(2) and 2.

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about May 7, 2009, in the Eastern District of Pennsylvania and elsewhere,
defendants

**ANTHONY WILLIAMS,
a/k/a "Tone," and
KENDALL BROWN, JR.,**

knowingly and with the intent to defraud, used, and aided and abetted the use of, an unauthorized access devices, that is, a Barclays credit card issued on the account of victim "J. F.," account number ending in 1025, 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, Sections 1029(a)(2) and 2.

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

In or about June and July 2009, in the Eastern District of Pennsylvania and elsewhere, defendants

**ANTHONY WILLIAMS,
a/k/a “Tone,” and
JAMAL JENKINS,**

knowingly and with the intent to defraud, used, and aided and abetted the use of, an unauthorized access devices, that is, a Barclays credit card issued on the account of victim “R. K.,” ending in the numbers 6812, 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, Sections 1029(a)(2) and 2.

COUNT FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 15, 2009, in the Eastern District of Pennsylvania and elsewhere,
defendants

**ANTHONY WILLIAMS,
a/k/a “Tone,” and
WAYNE RAINEY,**

knowingly and with the intent to defraud, used, and aided and abetted the use of, unauthorized access devices, that is, Barclays credit cards issued on the account of victim “D. D.,” ending in the numbers 1551, 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, Sections 1029(a)(2) and 2.

COUNT SIX

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 19, 2009, in the Eastern District of Pennsylvania and elsewhere, defendants

**ANTHONY WILLIAMS,
a/k/a "Tone,"
WILLIE TIMMONS,
a/k/a "Boo Boo," and
TYRONE GLENN,**

knowingly and with the intent to defraud, used, and aided and abetted the use of, an unauthorized access device, that is, a Wells Fargo credit card issued on the account of victim "L. C.," ending in the numbers 7301, 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, Sections 1029(a)(2) and 2.

COUNT SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 20, 2009, in the Eastern District of Pennsylvania and elsewhere, defendants

**ANTHONY WILLIAMS,
a/k/a "Tone,"
WILLIE TIMMONS,
a/k/a "Boo Boo," and
TYRONE GLENN,**

knowingly and with the intent to defraud, used, and aided and abetted the use of, unauthorized access devices, that is, Barclays credit cards issued on the account of victim "L. C.," ending in the numbers 1842, 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, Sections 1029(a)(2) and 2.

COUNT EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 2, 2009, in the Eastern District of Pennsylvania and elsewhere, defendants

**ANTHONY WILLIAMS,
a/k/a "Tone," and
BARBARA FORREST**

knowingly and with the intent to defraud, used, and aided and abetted the use of, an unauthorized access device, that is, a Barclays credit card issued on the account of victim "F. M.," ending in the numbers 6952, 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, Sections 1029(a)(2) and 2.

COUNT NINE

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 4 and 5, 2009, in the Eastern District of Pennsylvania and elsewhere, defendants

**ANTHONY WILLIAMS,
a/k/a "Tone,"
WILLIE TIMMONS,
a/k/a "Boo Boo," and
TYRONE GLENN,**

knowingly and with the intent to defraud, used, and aided and abetted the use of, an unauthorized access device, that is, a Discover credit card issued on the account of victim "L. C.," ending in the numbers 4088, 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, Sections 1029(a)(2) and 2.

COUNT TEN

THE GRAND JURY FURTHER CHARGES THAT:

In or about September 2009, in the Eastern District of Pennsylvania and elsewhere, defendants

**ANTHONY WILLIAMS,
a/k/a “Tone,”
WILLIE TIMMONS,
a/k/a “Boo Boo,”
JAMAL JENKINS, and
TYRONE GLENN,**

knowingly and with the intent to defraud, used, and aided and abetted the use of, unauthorized access devices, that is, Barclays credit cards issued on the account of victim “R. K.,” ending in the numbers 2359, 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, Sections 1029(a)(2) and 2.

COUNT ELEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 25, 2009, in the Eastern District of Pennsylvania and elsewhere, defendants

**ANTHONY WILLIAMS,
a/k/a “Tone,” and
WAYNE RAINEY,
a/k/a “Pip,”**

knowingly and with the intent to defraud, used, and aided and abetted the use of, an unauthorized access device, that is, a Barclays credit card issued on the account of victim “S. F.” ending in the numbers 5952, 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, Sections 1029(a)(2) and 2.

COUNT TWELVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 15, 2009, in the Eastern District of Pennsylvania and elsewhere, defendants

**ANTHONY WILLIAMS,
a/k/a "Tone," and
WAYNE RAINEY,**

knowingly and with the intent to defraud, used, and aided and abetted the use of, an unauthorized access device, that is, a Citibank credit card issued on the account of "J. W.," ending in the numbers 1892, 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, Sections 1029(a)(2) and 2.

COUNT THIRTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 17, 2009, in the Eastern District of Pennsylvania and elsewhere, defendants

**ANTHONY WILLIAMS,
a/k/a "Tone," and
WAYNE RAINEY,**

knowingly and with the intent to defraud, used, and aided and abetted the use of, an unauthorized access device, that is, a Citibank credit card issued on the account of victim "G.W.," ending in the numbers 6246, to 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, Sections 1029(a)(2) and 2.

COUNT FOURTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 4, 2010, in the Eastern District of Pennsylvania and elsewhere, defendants

**ANTHONY WILLIAMS,
a/k/a “Tone,”and
TIMEEKA LOUD,
a/k/a “Envy,”**

knowingly and with the intent to defraud, used, and aided and abetted the use of, an unauthorized access device, that is, a Home Depot credit card issued in the name of victim “V. G.,” ending in the numbers 2348, 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, Sections 1029(a)(2) and 2.

COUNT FIFTEEN

THE GRAND JURY FURTHER CHARGES THAT:

1. At all times material to this indictment, Wachovia Bank (now Wells Fargo Bank) was a financial institution whose deposits were insured by the Federal Deposit Insurance Corporation, FDIC Number 3511.

2. From in or about May 2009, to in or about June 2010, in the Eastern District of Pennsylvania and elsewhere, defendants

**ANTHONY WILLIAMS,
a/k/a “Tone,”
WILLIE TIMMONS,
a/k/a “Boo Boo,”
WAYNE RAINEY,
a/k/a “Pip,”
JAMAL JENKINS,
JENNIFER PEARSON,
AMINA HOLMES,
TIMEEKA LOUD,
a/k/a “Envy,”
KENDALL BROWN, JR., and
ZACHARY ANDREWS**

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 Wachovia Bank by means of false and fraudulent pretenses, representations, and promises.

It was a part of the scheme that:

3. Defendant JENNIFER PEARSON, a former employee of Penn Mutual Life Insurance Company, illegally provided identity information, including the names, dates of birth, social security numbers, and credit card and bank account numbers of customers, to

defendants AMINA HOLMES and TIMEEKA LOUD, who promised to pay her for the information.

4. This stolen identity information was used by defendant ANTHONY WILLIAMS to gain access to the bank accounts of the victims, usually by making telephone calls to the financial institutions where the victims maintained their accounts. Once he gained access to the accounts, WILLIAMS changed the addresses and contact telephone numbers on the accounts, and had new checks sent to the new addresses, without the knowledge and consent of the victims.

5. Defendants WILLIE TIMMONS, WAYNE RAINEY, and others known and unknown to the grand jury, recruited others, including defendants JAMAL JENKINS, KENDALL BROWN, JR., and ZACHARY ANDREWS to cash checks drawn on the victims' accounts, without the knowledge and consent of the victims.

6. Defendants WAYNE RAINEY, JAMAL JENKINS, KENDALL BROWN, JR., ZACHARY ANDREWS and others known and unknown to the grand jury, cashed the fraudulently obtained checks, which were made payable to themselves, without the knowledge and consent of the victims.

Wachovia Checking Account of "K. A.," Account Number Ending in 1910

7. On or about October 2, 2009, at Wachovia Bank, Abington, Pennsylvania, defendant WAYNE RAINEY cashed a \$5,000 check made payable to himself, which had been fraudulently written on the Wachovia checking account of "K. A.," ending in the numbers 1910.

8. On or about October 6, 2009, at Wachovia Bank, Glenside, Pennsylvania, defendant JAMAL JENKINS cashed a \$5,000 check made payable to himself, which had been fraudulently written on the Wachovia checking account of "K. A.," ending in the numbers 1910.

Wachovia Checking Account of “S. A.,” Account Number Ending in 4332

9. In late 2009 or early 2010, defendant JENNIFER PEARSON obtained identity and bank account information of Penn Mutual Life Insurance Company customer “S. A.” and provided it to defendant AMINA HOLMES, who, in turn, gave it to defendant TIMEEKA LOUD.

10. From at least on or about May 19, 2010 to on or about June 3, 2010, defendant ANTHONY WILLIAMS, posing as account holder “S. A.,” made telephone calls to Wachovia Bank, during which he requested information about the account, as well as a copy of the last check written on the account.

11. On or about June 4, 2010, defendant ANTHONY WILLIAMS, posing as “S. A.,” the account holder of Wachovia checking account number ending in 4332, made a telephone call to Wachovia Bank, during which he requested information about the balance in the account.

12. On or about June 4, 2010, at Philadelphia, Pennsylvania, defendant WAYNE RAINEY recruited a person known to the grand jury to cash a \$900 check which had been fraudulently written on the Wachovia checking account of “S. A.,” account number ending in 4332.

13. On or about June 4, 2010, at Philadelphia, Pennsylvania, defendant WILLIE TIMMONS drove a person known to the grand jury to Wachovia Bank, 2005 Market Street, Philadelphia, Pennsylvania, so that she could cash a \$900 check, which had been fraudulently written on the Wachovia checking account of “S. A.,” account number ending in 4332, and given to her by TIMMONS, who made a telephone call to confirm the check was good

before sending the person into the bank.

14. On or about June 4, 2010, a person known to the grand jury unsuccessfully attempted to cash a \$900 check made payable to herself at Wachovia Bank, 2005 Market Street, Philadelphia, Pennsylvania, which had been written on the Wachovia checking account of "S. A.," account number ending in 4332.

Wachovia Checking Account of "B. K.," Account Number Ending in 9717

15. On or about May 11, 2009, at Wachovia Bank, Glenside, Pennsylvania, defendant JAMAL JENKINS cashed a \$7,500 check made payable to himself, which had been fraudulently written on the Wachovia checking account of "B. K.," ending in the numbers 9717.

16. On or about September 22, 2009, at Wachovia Bank, Wachovia Bank, Philadelphia, Pennsylvania, defendant ZACHARY ANDREWS attempted to cash a \$7,500 check made payable to himself, which had been fraudulently written on the Wachovia checking account of "B. K.," ending in the numbers 9717.

Wachovia Bank account of "A. M.," Account Number Ending in 7285

17. On or about May 1, 2009, at Wachovia Bank, Philadelphia, Pennsylvania, defendant KENDALL BROWN, JR. attempted to cash a \$5,400 check made payable to himself, which had been fraudulently written on the Wachovia checking account of "A. M.," ending in the numbers 7285.

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

COUNT SIXTEEN

THE GRAND JURY FURTHER CHARGES THAT:

1. At all times material to this indictment, Citizens Bank was a financial institution whose deposits were insured by the Federal Deposit Insurance Corporation, Certificate Number 57282.

2. From in or about February 2010, to in or about August 2010, in the Eastern District of Pennsylvania and elsewhere, defendants

**ANTHONY WILLIAMS,
a/k/a “Tone,”
JENNIFER PEARSON,
AMINA HOLMES,
TIMEEKA LOUD,
a/k/a, “Envy,”
COURTNEY CARR,
BRIAN WRIGHT,
KHARIM KILGORE, and
ALPHONZO RICHARDSON**

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

3. Defendants COURTNEY CARR and BRIAN WRIGHT, former employees of Citizens Bank, and defendant JENNIFER PEARSON, a former employee of Penn Mutual Insurance Company, and others known and unknown to the grand jury, illegally provided identity information, including the names, dates of birth, social security numbers, and credit card and bank account numbers of customers, to defendants AMINA HOLMES, TIMEEKA LOUD, and others known and unknown to the grand jury, who promised to pay them for the information.

4. This stolen identity information was used by defendant ANTHONY WILLIAMS to gain access to the bank accounts of the victims, usually by making telephone calls

to the financial institutions where the victims maintained their accounts. Once he gained access to the accounts, WILLIAMS changed the addresses and contact telephone numbers on the accounts, and had new checks sent to the new addresses, without the knowledge or consent of the account holders.

5. Defendants KHARIM KILGORE, ALPHONZO RICHARDSON, and others known and unknown to the grand jury, cashed the fraudulently obtained checks, which were made payable to themselves, without the knowledge and consent of the victims.

Citizens Bank Account of “D. D. and “T. D.,” Account Number Ending in 2354

6. On or about August 13, 2010, at the Upper Darby, Pennsylvania branch of Citizens Bank, teller defendant BRIAN WRIGHT, an employee of Citizens Bank, accessed the account and personal information of victims “D. D.” and “T. D.,” the account holders of Citizens Bank account number ending in 2354, which he subsequently provided to a person known to the grand jury.

7. On or about August 17, 18, and 19, 2010, defendant ANTHONY WILLIAMS, posing as account holder “D. D.,” made telephone calls to Citizens Bank, during which he requested the balance on the account, the date of the last check written on the account, who that check was made payable to, that the telephone numbers on the account be changed, numbers for Citizens branches in Newark, Delaware, and if there was a hold on the account.

8. On or about August 17, 2010, defendant ANTHONY WILLIAMS, posing as a Citizens Bank employee, called the check printing company Harland Clarke and ordered new checks to be sent to a new address in Philadelphia, Pennsylvania.

9. On or about August 19, 2010, three checks, for \$6,000 each, made payable to three individuals known to the grand jury, were cashed by them at Citizens Bank branches in

Willow Grove, Pennsylvania, King of Prussia, Pennsylvania, and Wilmington, Delaware.

Citizens Bank Account of “R. B. and M. B.,” Account Number Ending in 5852

10. On or about February 24, 2010, at Citizens Bank, North Wales, Pennsylvania, defendant COURTNEY CARR, an employee of Citizens Bank, accessed the account and personal information of victims “R. B.” and “M. B.,” the account holders of Citizens Bank account number ending in 5852, which she subsequently provided to a person known to the grand jury.

11. On or about March 8, 2010, defendant ANTHONY WILLIAMS, posing as account holder “R.B.,” made telephone calls to Citizens Bank, during which he added a new address on the account and ordered checks to be sent overnight to the new address.

12. On or about March 9, 2010, at Citizens Bank, Bala Cynwyd, Pennsylvania, defendant KHARIM KILGORE cashed a \$3,500 check fraudulently made payable to himself, which had been written on the Citizens checking account of “R. B.” and “M. B.,” ending in the numbers 5852.

13. On or about March 10, 2010, at Citizens Bank, Philadelphia, Pennsylvania, defendant KHARIM KILGORE cashed a \$7,000 check fraudulently made payable to himself, which had been written on the Citizens checking account of “R. B.” and “M. B.,” ending in the numbers 5852.

14. On or about March 13, 2010, at Citizens Bank, Philadelphia, Pennsylvania, defendant KHARIM KILGORE cashed a \$5,000 check fraudulently made payable to himself, which had been written on the Citizens checking account of “R. B.” and “M. B.,” ending in the numbers 5852.

Citizens Bank Account of “A. G. and V. G.,” Account Number Ending in 1938

15. In late 2009 or early 2010, defendant JENNIFER PEARSON obtained identity and bank account information of Penn Mutual Life Insurance Company customers "A. G. and V. G." and provided it to defendant AMINA HOLMES, who, in turn, gave it to defendant TIMEEKA LOUD.

16. On or about July 8, 2010, defendant ANTHONY WILLIAMS, posing as the male account holder, made telephone calls to Citizens Bank, during which he added a new address and telephone number on the account.

17. On or about July 12, 2010, an individual known to the grand jury attempted to cash a check fraudulently made payable to her in the amount of \$9,000 at a Citizens Bank branch in Philadelphia, Pennsylvania.

18. On or about July 13, 2010, defendant TIMEEKA LOUD, posing as the female account holder, called Citizens Bank, requested the telephone number of the branch where the account was opened, asked why the account had a zero balance, and hung up when the customer service representative informed her that a supervisor was being contacted.

Citizens Bank Account of "P. C.," Account Number Ending in 7094

19. On or about February 24, 2010, at Citizens Bank, North Wales, Pennsylvania, defendant COURTNEY CARR, an employee of Citizens Bank, accessed the account and personal information of victim "P. C.," the account holder of Citizens Bank account number ending in 7094, which she subsequently provided to a person known to the grand jury.

20. On or about March 8, 2010, defendant ANTHONY WILLIAMS, posing as the account holder, made a telephone call to Citizens Bank and requested the balance of the account, information pertaining to the last check that posted to the account, and that statements be sent to a different address.

21. On or about March 24, 2010, at Citizens Bank, Philadelphia, Pennsylvania, defendant ALPHONZO RICHARDSON cashed a \$5,000 check fraudulently made payable to himself, which had been written on the Citizens checking account of "P. C.," ending in the numbers 7094.

22. On or about March 25, 2010, at Citizens Bank, Philadelphia, Pennsylvania, defendant ALPHONZO RICHARDSON cashed a \$5,000 check fraudulently made payable to himself, which had been written on the Citizens checking account of "P. C.," ending in the numbers 7094.

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

COUNT SEVENTEEN

THE GRAND JURY FURTHER CHARGES THAT:

1. At all times material to this indictment, TD Bank was a financial institution whose deposits were insured by the Federal Deposit Insurance Corporation, Certificate Number 18409.

2. From in or about October 2009, to in or about August 2010, in the Eastern District of Pennsylvania and elsewhere, defendants

**ANTHONY WILLIAMS,
a/k/a "Tone,"
JENNIFER PEARSON,
AMINA HOLMES,
TIMEEKA LOUD,
a/k/a "Envy," and
ZACHARY ANDREWS**

knowingly executed, 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 false and fraudulent pretenses, representations, and promises.

3. Defendant JENNIFER PEARSON, a former employee of Penn Mutual Insurance Company, and others known and unknown to the grand jury, illegally provided identity information, including the names, dates of birth, social security numbers, and credit card and bank account numbers of customers, to AMINA HOLMES, who, in turn, gave it to defendant TIMEEKA LOUD.

4. This stolen identity information was used by defendant ANTHONY WILLIAMS to gain access to the bank accounts of the victims, usually by making telephone calls to the financial institutions where the victims maintained their accounts. Once he gained access to the accounts, WILLIAMS changed the addresses and contact telephone numbers on the

accounts, and had new checks sent to the new addresses, without the knowledge and consent of the account holders.

5. Defendant ZACHARY ANDREWS and others known and unknown to the grand jury cashed the fraudulently obtained checks, which were made payable to themselves, without the knowledge and consent of the victims.

TD Bank Account of “P. E. and M. E.,” Account Number Ending in 1998

6. On or about October 21, 2009, defendant ANTHONY WILLIAMS, posing as account holder “P. E.,” made telephone calls to TD Bank, during which he requested information on the account.

7. On or about October 26, 2009, at TD Bank, Philadelphia, Pennsylvania, defendant ZACHARY ANDREWS cashed a \$5,000 check fraudulently made payable to himself, which had been written on the TD Bank checking account of “P. E.,” ending in the numbers 1998.

TD Bank Account of “K. T. and P. T.,” Account Number ending in 5877

8. In late 2009 or early 2010, defendant JENNIFER PEARSON obtained identity and bank account information of Penn Mutual Life Insurance Company customers “K. T. and P. T.” and provided it to defendant AMINA HOLMES, who, in turn, gave it to defendant TIMEEKA LOUD.

9. On or about June 10, 2010, defendant ANTHONY WILLIAMS, posing as a TD Bank employee, called Harland Clarke and ordered new checks for the account to be sent to a new address.

10. Between June 11, 2010 and June 16, 2010, individuals known to the grand jury cashed six checks, made payable to themselves, in the total amount of \$32,000, at TD Bank branches in the Eastern District of Pennsylvania.

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

COUNT EIGHTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 8, 2010, in the Eastern District of Pennsylvania, and elsewhere, defendants

**ANTHONY WILLIAMS,
a/k/a "Tone,"
COURTNEY CARR,**

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 names of victims "R. B." and "M. B.," and the Citizens Bank account number ending in 5852, during and in relation to bank fraud.

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

COUNT NINETEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 4, 2010, in the Eastern District of Pennsylvania, and elsewhere,
defendants

**ANTHONY WILLIAMS,
a/k/a “Tone,”
JENNIFER PEARSON,
AMINA HOLMES, and
TIMEEKA LOUD,
a/k/a “Envy,”**

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 “S. A.,”
and the Wachovia account number ending in 4332, during and in relation to bank fraud.

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

COUNT TWENTY

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 13, 2010, in the Eastern District of Pennsylvania, and elsewhere,
defendants

**ANTHONY WILLIAMS,
a/k/a "Tone, and
TIMEEKA LOUD,
a/k/a "Envy,"**

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 names of victims "A. G. and V. G.", and the Citizen's Bank account number ending in 1938, during and in relation to bank fraud.

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

COUNT TWENTY-ONE

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 17, 2010, in the Eastern District of Pennsylvania, and elsewhere, defendants

**ANTHONY WILLIAMS,
a/k/a “Tone, and
BRIAN WRIGHT,**

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 names of victims “D. D. and T. D.,” and the Citizens Bank account number ending in 2354, during and in relation to bank fraud.

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

COUNT TWENTY- TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 19, 2010, at Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendant

**ANTHONY WILLIAMS,
a/k/a "Tone,"**

knowingly and without lawful authority transferred, possessed, and used, a means of identification of another person, that is, names, addresses, and other personal information, with the intent to commit, and to aid and abet, violations of federal law, that is, bank fraud, in violation of Title 18, United States Code, Section 1344, by possessing the personal and financial account information of "D. D. and T. D." and "I. J.," which he had used to fraudulently gain access to their bank accounts, and to allow others to unlawfully cash checks drawn on their bank accounts, thereby affecting interstate commerce.

In violation of Title 18, United States Code, Sections 1028(a)(7), (b)(1)(D), (c)(3)(A) 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, 1029, and 1344, as set forth in Counts One through Sixteen of this indictment, defendant

**ANTHONY WILLIAMS,
a/k/a "Tone,"**

shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 982(a)(2), any property, real or personal, that constitutes or is derived from proceeds obtained directly or indirectly as a result of such offenses.

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

ZANE DAVID MEMEGER
United States Attorney

GP

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

11-223

INDICTMENT

DESIGNATION FORM to be used by counsel to indicate the category of the case for the purpose of assignment to appropriate calendar.

Address of Plaintiff: 615 Chestnut Street, Suite 1250, Philadelphia, PA 19106-4476

Post Office: Philadelphia County: Philadelphia

Address of Defendant: 7214 Pittville Avenue, Philadelphia, PA 19126

Post Office: Philadelphia, PA County: Philadelphia

Register number: N/A

Place of accident, incident, or transaction: Eastern District of Pennsylvania

Post Office: EDPA County: EDPA

RELATED CASE, IF ANY:

Criminal cases are deemed related when the answer to the following question is "yes".

Does this case involve a defendant or defendants alleged to have participated in the same action or transaction, or in the same series of acts or transactions, constituting an offense or offenses?

YES/NO: NO

Case Number: N/A Judge: N/A

CRIMINAL: (Criminal Category - FOR USE BY U.S. ATTORNEY ONLY)

- 1. Antitrust
- 2. Income Tax and other Tax Prosecutions
- 3. Commercial Mail Fraud
- 4. Controlled Substances
- 5. Violations of 18 U.S.C. Chapters 95 and 96 (Sections 1951-55 and 1961-68) and Mail Fraud other than commercial
- 6. General Criminal

(U.S. ATTORNEY WILL PLEASE DESIGNATE PARTICULAR CRIME AND STATUTE CHARGED TO BE VIOLATED AND STATE ANY PREVIOUS CRIMINAL NUMBER FOR SPEEDY TRIAL ACT TRACKING PURPOSES)

18 U.S.C. § 371 (conspiracy - 1 count)

18 U.S.C. § 1028(a)(7) (identity theft - 1 count)

18 U.S.C. § 1028A(a)(1) (aggravated identity theft - 4 counts)

18 U.S.C. § 1029(a)(2) (use of one or more unauthorized access devices - 13 counts)

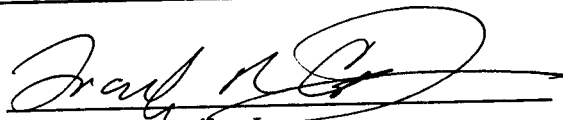
18 U.S.C. § 1344 (bank fraud - 3 counts)

18 U.S.C. § 2 (aiding and abetting)

Notice of Forfeiture

DATE: _____

4/12/11



Frank R. Costello, Jr.

Assistant United States Attorney

File No. 2010R001120

U.S. v. Anthony Williams, et al.