

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

**UNITED STATES OF AMERICA**

**v.**

**EDMOND CHAYA,  
a/k/a "Alhassane Bah,"  
a/k/a "Abkouk Edmond Chaya,"  
a/k/a "David Sylla,"  
a/k/a "Nelson Badmus"**

**CRIMINAL NO. 10-812**

**DATE FILED:**

**VIOLATIONS:  
18 U.S.C. § 1028(a)(1) (production  
of false identification documents - 1  
count)  
18 U.S.C. § 1543 (making of false  
passport -1 count)  
18 U.S.C. § 1344 (bank fraud -1  
count)  
18 U.S.C. § 2 (aiding and abetting)**

**SUPERSEDING INFORMATION**

**COUNT ONE**

**THE UNITED STATES ATTORNEY CHARGES THAT:**

On or about November 25, 2010, at Philadelphia, in the Eastern District of Pennsylvania, the defendant,

**EDMOND CHAYA,  
a/k/a "Alhassane Bah,"  
a/k/a "Abkouk Edmond Chaya,"  
a/k/a "David Sylla,"  
a/k/a "Nelson Badmus"**

knowingly and without lawful authority produced, in and affecting interstate and foreign commerce, and aided and abetted the production of, a false identification document, that is, a counterfeit passport of the Republic of Guinea containing CHAYA's photograph, the name "Alhassane Bah," and passport number R0244953.

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

**COUNT TWO THE UNITED**

**STATES ATTORNEY FURTHER CHARGES THAT:**

On or about November 25, 2010, at Philadelphia, in the Eastern District of Pennsylvania, the defendant,

**EDMOND CHAYA,**  
**a/k/a "Alhassane Bah,"**  
**a/k/a "Abkouk Edmond Chaya,"**  
**a/k/a "David Sylla,"**  
**a/k/a "Nelson Badmus"**

knowingly and falsely made, and aided and abetted the making of a forged, counterfeited, and altered passport, or instrument purporting to be a passport, issued by and under the authority of the Republic of Guinea, in that the defendant purchased the counterfeit passport containing his picture with the intent to obtain additional false identification documents.

In violation of Title 18, United States Code, Sections 1543 and 2.

**COUNT THREE THE UNITED**

**STATES ATTORNEY FURTHER CHARGES THAT:**

1. At all times material to this indictment, Wachovia Bank was a financial institution, the deposits of which were insured by the Federal Deposit Insurance Corporation, certificate no. 33869.

2. From on or about December 28, 2009 to on or about December 31, 2009, in Philadelphia and elsewhere, in the Eastern District of Pennsylvania, defendant

**EDMOND CHAYA,**

**a/k/a "Alhassane Bah,"**

**a/k/a "Abkouk Edmond Chaya,"**

**a/k/a "David Sylla,"**

**a/k/a "Nelson Badmus"**

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

**THE SCHEME**

3. It was a part of the scheme that defendant EDMOND CHAYA forged and caused to be forged a check, drawn on the Wachovia checking account of person known to the United States Attorney, account number ending in 2522, in the amount of \$18,500.

It was a further part of the scheme that:

4. On or about December 28, 2009, defendant EDMOND CHAYA deposited the bogus check into an account ending in 4748, registered to a person known to the United States Attorney, at a Wachovia Bank branch.

5. From on or about December 29, 2009 to on or about December 31, 2009,

through a combination of approximately 20 counter withdrawals, ATM withdrawals and debit card purchases, approximately \$16,960 was drawn from the account after the balance had been inflated with the bogus check.

In violation of Title 18, United States Code, Section 1344.

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ZANE DAVID MEMEGER

UNITED STATES ATTORNEY