

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

UNITED STATES OF AMERICA	:	CRIMINAL NO. 11-_____
v.	:	DATE FILED: <u>July 7, 2011</u>
CHARLES MOORE	:	VIOLATIONS:
	:	18 U.S.C. § 1029(a)(5) (fraud in
	:	connection with access devices - 4 counts)
	:	18 U.S.C. § 1028A (aggravated identity
	:	theft - 3 counts)
	:	18 U.S.C. § 472 (passing counterfeit
	:	currency - 1 count)

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

On or about October 8, 2010, in the Eastern District of Pennsylvania and the Middle District of Pennsylvania, defendant

CHARLES MOORE

knowingly and with the intent to defraud, effected a transaction with an access device, that is, a Target instant credit card, in the name of R.L., a person known to the grand jury, to obtain things of value aggregating \$1,000 or more during a one-year period, for a total of at least \$1,890, thereby affecting interstate commerce.

In violation of Title 18, United States Code, Section 1029(a)(5).

COUNT TWO

THE GRAND JURY CHARGES THAT:

On or about October 8, 2010, in the Eastern District of Pennsylvania and the Middle District of Pennsylvania, defendant

CHARLES MOORE

knowingly and with the intent to defraud, effected a transaction with an access device, that is, an HH Gregg instant credit card, in the name of R.L., a person known to the grand jury, to obtain things of value aggregating \$1,000 or more during a one-year period, for a total of at least \$2,172, thereby affecting interstate commerce.

In violation of Title 18, United States Code, Section 1029(a)(5).

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 8, 2010, in the Eastern District of Pennsylvania and the Middle District of Pennsylvania, defendant

CHARLES MOORE

knowingly and without lawful authority possessed and used a means of identification of another person, that is, the name of R.L., during and in relation to fraud in connection with an access device.

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

COUNT FOUR

THE GRAND JURY CHARGES THAT:

On or about October 8, 2010, in the Eastern District of Pennsylvania and the Middle District of Pennsylvania, defendant

CHARLES MOORE

knowingly and with the intent to defraud, effected a transaction with an access device, that is, a Target instant credit card, in the name of T.C., a person known to the grand jury, to obtain things of value aggregating \$1,000 or more during a one-year period, for a total of at least \$2,406, thereby affecting interstate commerce.

In violation of Title 18, United States Code, Section 1029(a)(5).

COUNT FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 8, 2010, in the Eastern District of Pennsylvania and the Middle District of Pennsylvania, defendant

CHARLES MOORE

knowingly and without lawful authority possessed and used a means of identification of another person, that is, the name of T.C., during and in relation to fraud in connection with an access device.

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

COUNT SIX

THE GRAND JURY CHARGES THAT:

On or about November 5, 2010, in Cheltenham Township, Montgomery County, in the Eastern District of Pennsylvania, defendant

CHARLES MOORE

knowingly and with the intent to defraud, effected a transaction with an access device, that is, a Target instant credit card, in the name of E.S., a person known to the grand jury, to obtain things of value aggregating \$1,000 or more during a one-year period, for a total of at least \$1,098, thereby affecting interstate commerce.

In violation of Title 18, United States Code, Section 1029(a)(5).

COUNT SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 5, 2010, in Cheltenham Township, Montgomery County,
in the Eastern District of Pennsylvania, defendant

CHARLES MOORE

knowingly and without lawful authority possessed and used a means of identification of another
person, that is, the name of E.S., during and in relation to fraud in connection with an access
device.

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

COUNT EIGHT

THE GRAND JURY CHARGES THAT:

On or about November 26, 2010, in North Wales, Montgomery County, in the Eastern District of Pennsylvania, defendant

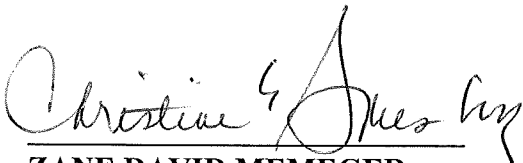
CHARLES MOORE

with intent to defraud, possessed, passed, and uttered falsely made, forged, and counterfeited obligations of the United States, that is approximately ninety-seven counterfeit \$100 Federal Reserve Notes.

In violation of Title 18, United States Code, Section 472.

A TRUE BILL:

GRAND JURY FOREPERSON


ZANE DAVID MEMEGER
UNITED STATES ATTORNEY