

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

<b>UNITED STATES OF AMERICA</b>	<b>:</b>	<b>CRIMINAL NO. <u>10-212</u></b>
<b>v.</b>	<b>:</b>	<b>DATE FILED: <u>March 24, 2011</u></b>
<b>HAJAR MUHAMMAD</b>	<b>:</b>	<b>VIOLATIONS:</b>
<b>JOSEPH MIDDLETON</b>	<b>:</b>	<b>18 U.S.C. § 371 (conspiracy - 1 count)</b>
<b>KAREEM COMPTON</b>	<b>:</b>	<b>18 U.S.C. § 1344 (bank fraud - 2 counts)</b>
<b>CHARLENE MARTIN HOLLIMAN,</b>	<b>:</b>	<b>18 U.S.C. § 1028A (aggravated identity</b>
<b>a/k/a "Sugarpooh"</b>	<b>:</b>	<b>theft - 3 counts)</b>
<b>HAROLD GOODMAN,</b>	<b>:</b>	<b>18 U.S.C. § 2 (aiding and abetting)</b>
<b>a/k/a "J,"</b>	<b>:</b>	<b>Notice of forfeiture</b>
<b>a/k/a "Bamboo"</b>	<b>:</b>	
<b>VINCENT WILLIAMS,</b>	<b>:</b>	
<b>a/k/a "Umar"</b>	<b>:</b>	
<b>NATASHA GILLIAM,</b>	<b>:</b>	
<b>a/k/a "Tasha"</b>	<b>:</b>	
<b>HARMON FORD</b>	<b>:</b>	

**SUPERSEDING INDICTMENT**

**COUNT ONE**

**THE GRAND JURY CHARGES THAT:**

At all times material to this superseding indictment:

1. TD Bank was a financial institution, the deposits of which were insured by the Federal Deposit Insurance Corporation, certificate number 21140.
2. Defendant HAJAR MUHAMMAD was employed as a teller with TD Bank at the City Avenue, Philadelphia, Pennsylvania branch, where she had access to checks cashed against, and deposited into, customers' accounts.
3. From on or about October 5, 2009 to on or about November 30, 2009, in the Eastern District of Pennsylvania and the District of New Jersey, defendants

**HAJAR MUHAMMAD,  
JOSEPH MIDDLETON,  
KAREEM COMPTON,  
CHARLENE MARTIN HOLLIMAN,  
a/k/a "Sugarpooh,"  
HAROLD GOODMAN,  
a/k/a "J,"  
a/k/a "Bamboo,"  
VINCENT WILLIAMS,  
a/k/a "Umar,"  
NATASHA GILLIAM,  
a/k/a "Tasha," and  
HARMON FORD**

conspired and agreed, with others known and unknown to the grand jury, to commit offenses against the United States, that is, to knowingly execute and attempt to execute a scheme to defraud TD Bank, in violation of Title 18, United States Code, Section 1344.

#### **MANNER AND MEANS**

4. Defendants HAJAR MUHAMMAD, JOSEPH MIDDLETON, KAREEM COMPTON, CHARLENE MARTIN HOLLIMAN, HAROLD GOODMAN, VINCENT WILLIAMS, NATASHA GILLIAM and HARMON FORD, and their co-conspirators, used stolen account information to cash counterfeit checks against TD Bank business and personal accounts.

5. Defendant HAJAR MUHAMMAD provided to defendant KAREEM COMPTON bank account information, such as account holder names and account numbers of TD Bank account holders.

6. Defendant HAJAR MUHAMMAD used her position with TD Bank to photocopy checks, which contained the name and authorized signature of the account holder and the account number, that were cashed against, or deposited into, the accounts of TD Bank

business and personal account holders at the TD Bank City Avenue branch. The photocopies of the checks, which contained account holder information, were then passed by defendant MUHAMMAD to defendant KAREEM COMPTON.

7. Defendant KAREEM COMPTON and others unknown to the grand jury then arranged for the manufacture of counterfeit checks, using the names of the account holders, the account numbers and other information on the photocopied checks provided by defendant HAJAR MUHAMMAD and acquired from others unknown to the grand jury. The counterfeit checks, which had purported signatures of the authorized signers for the accounts, were made payable to defendants JOSEPH MIDDLETON, NATASHA GILLIAM and HARMON FORD, to Ava Martin, Khouri McKenzie, Dionna Hayes, Denise Hayes, Derricka Hayes, Dominique Hayes, Tiana Alexander, Raetiana Williams, Alesha Williams, Lakera Steward, Gerald Bell, Donald Flowers, and Anthony Myers, all charged elsewhere, and to other individuals known to the grand jury, all of whom were recruited to act as “check runners,” individuals who cashed or deposited the counterfeit checks drawn on the accounts of those TD Bank accounts.

8. Armed with identification in their own names and counterfeit checks made payable to them, defendants JOSEPH MIDDLETON, NATASHA GILLIAM and HARMON FORD, as well as Ava Martin, Khouri McKenzie, Dionna Hayes, Denise Hayes, Derricka Hayes, Dominique Hayes, Tiana Alexander, Raetiana Williams, Alesha Williams, Lakera Steward, Gerald Bell, Donald Flowers, and Anthony Myers, and other check-runners cashed or deposited counterfeit checks at TD Bank branches, totaling more than approximately \$207,000.

## **OVERT ACTS**

In furtherance of the conspiracy, defendants HAJAR MUHAMMAD, JOSEPH MIDDLETON, KAREEM COMPTON, CHARLENE MARTIN HOLLIMAN, HAROLD GOODMAN, VINCENT WILLIAMS, NATASHA GILLIAM and HARMON FORD, and their co-conspirators, committed the following overt acts in the Eastern District of Pennsylvania and the District of New Jersey:

1. Between on or about October 5, 2009 and on or about November 23, 2009, defendant HAJAR MOHAMMAD photocopied checks drawn on the accounts of eight TD Bank business accounts and one personal account that had been cashed or deposited at the TD Bank branch located on City Avenue, Philadelphia, Pennsylvania, and then provided defendant KAREEM COMPTON with the photocopies of the checks, which contained account information and signatures of the authorized signers for those accounts.

2. Between on or about October 14, 2009 and on or about November 30, 2009, defendants KAREEM COMPTON, CHARLENE MARTIN HOLLIMAN, HAROLD GOODMAN, and VINCENT WILLIAMS, and others known and unknown to the grand jury, used the names and purported signatures of the account holders and the account numbers from the checks photocopied by defendant HAJAR MUHAMMAD, and TD Bank account information acquired from individuals unknown to the grand jury to manufacture counterfeit checks and to acquire approximately \$207,000 from TD Bank by sending defendant JOSEPH MIDDLETON, as well as Ava Martin, Khouri McKenzie, Dionna Hayes, Denise Hayes, Derricka Hayes, Dominique Hayes, Tiana Alexander, Raetiana Williams, Alesha Williams, Lakera Steward, Gerald Bell, Donald Flowers, and Anthony Myers, and other check runners into TD Bank

branches in Pennsylvania and New Jersey to cash or deposit the counterfeit checks made payable to the check runners.

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

**COUNT TWO**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. Paragraphs 1, 2 and 4 through 8 and Overt Acts 1 and 2 of Count One are realleged here.
2. From on or about October 5, 2009 to on or about November 30, 2009, in the Eastern District of Pennsylvania and the District of New Jersey, defendants

**HAJAR MUHAMMAD,  
JOSEPH MIDDLETON,  
KAREEM COMPTON,  
CHARLENE MARTIN HOLLIMAN,  
a/k/a "Sugarpooh,"  
HAROLD GOODMAN  
a/k/a "J,"  
VINCENT WILLIAMS,  
a/k/a "Umar,"  
NATASHA GILLIAM,  
a/k/a "Tasha,"and  
HARMON FORD**

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

**THE SCHEME**

3. From on or about October 5, 2009 to on or about November 23, 2009, defendant HAJAR MUHAMMAD improperly acquired account information for TD Bank business accounts belonging to ACTS Christian Transitional Services, Liberty News Distributors, RSIA Incorporated, PBA Construction, Green Silverstein and Groff, Boys' Latin of Philadelphia Charter School, DNA Ambulance Inc., and Capozzoli Catering of Chester County,

Inc., and the TD Bank personal account of S.R. by making photocopies of checks cashed against, or deposited into, these accounts at the TD Bank branch located on City Avenue, Philadelphia, Pennsylvania.

4. Defendant HAJAR MUHAMMAD then provided the photocopies of the checks, containing the account and account holder information for those accounts, to defendant KAREEM COMPTON, who, with defendants CHARLENE MARTIN HOLLIMAN, HAROLD GOODMAN, VINCENT WILLIAMS, NATASHA GILLIAM and HARMON FORD, and others known and unknown to the grand jury, used that information to fraudulently take, and attempt to take, approximately \$185,000 from TD Bank by cashing and depositing counterfeit checks drawn on the business accounts of ACTS Christian Transitional Services, Liberty News Distributors, RSIA Incorporated. PBA Construction, Green Silverstein and Groff, Boys' Latin of Philadelphia Charter School, DNA Ambulance Inc., and Capozzoli Catering of Chester County, Inc, and on the personal account of S.R.

5. From on or about October 14, 2009 to on or about November 30, 2009, defendants JOSEPH MIDDLETON, NATASHA GILLIAM and HARMON FORD, and approximately thirty-five other check runners, known to the grand jury, cashed and deposited counterfeit checks that were drawn on the business accounts of ACTS Christian Transitional Services, Liberty News Distributors, RSIA Incorporated. PBA Construction, Green Silverstein and Groff, Boys' Latin of Philadelphia Charter School, DNA Ambulance Inc., and Capozzoli Catering of Chester County, Inc. and on the personal account of S.R. and that had been provided to them by defendants KAREEM COMPTON, CHARLENE MARTIN HOLLIMAN and HAROLD GOODMAN and others unknown to the grand jury.

6. In furtherance of the scheme, at the direction of defendants KAREEM COMPTON and CHARLENE MARTIN HOLLIMAN, defendant NATASHA GILLIAM was transported in Philadelphia, Pennsylvania to a TD Bank branch to deposit into her bank account the following counterfeit check, made payable to her, drawn on the TD Bank account of Child Care Information Services and then was instructed to withdraw that money from her account.

The transaction was as follows:

<u>DATE</u>	<u>LOCATION</u>	<u>CHECK CASHER</u>	<u>CHECK NO.</u>	<u>AMOUNT</u>
09/16/09	Philadelphia, PA	Natasha Gilliam	143890	\$4,960 deposited; \$4,693 withdrawn

7. In furtherance of the scheme, on or about October 5, 2009, defendant HAJAR MUHAMMAD cashed check no. 14599, that was drawn on the TD Bank account of ACTS Christian Transitional Services and signed by J.G., an authorized signer for that account and then made a photocopy of that check.

8. In furtherance of the scheme, at the direction of defendants KAREEM COMPTON, CHARLENE MARTIN HOLLIMAN and others unknown to the grand jury, check runners were transported to TD Bank branches in Pennsylvania and New Jersey to cash the following counterfeit checks, made payable to them, drawn on the TD Bank account of ACTS Christian Transitional Services, and with the purported signature of J.G. The transactions were as follows:

<u>DATE</u>	<u>LOCATION</u>	<u>CHECK CASHER</u>	<u>CHECK NO.</u>	<u>AMOUNT</u>
10/14/09	Marlton, NJ	Denise Hayes	14676	\$1,629

<u>DATE</u>	<u>LOCATION</u>	<u>CHECK CASHER</u>	<u>CHECK NO.</u>	<u>AMOUNT</u>
10/14/09	Willow Ridge, NJ	R.H.	14677	\$1,645
10/14/09	Mt. Laurel, NJ	J.L.	14678	\$1,755
10/15/09	Mt. Laurel, NJ	Tiana Alexander	14703	\$1,790
10/15/09	Marlton, NJ	S.W.	14704	\$1,650
10/15/09	Willow Ridge, NJ	Natasha Gilliam	14702	\$1,695
10/15/09	Marlton, NJ	Ava Martin	14699	\$1,751
10/15/09	King of Prussia, PA	N.L.	14679	\$1,825
10/15/09	Collegeville, PA	L.A.	14689	\$1,700
10/15/09	Royersford, PA	J.A.	14690	\$1,680
10/15/09	Cherry Hill, NJ	N.B.	14701	\$1,750
10/15/09	Cherry Hill, NJ	R.H.	14700	\$1,725
10/16/09	Center City, Philadelphia, PA	D.He.	14695	\$1,992
10/16/09	Rittenhouse, Philadelphia, PA	J.W.	14696	\$1,966
10/16/09	University City, Philadelphia, PA	D.N.	14697	\$1,987
10/16/09	Jefferson Hospital, Philadelphia, PA	S.E.	14698	\$1,988
10/19/09	Center City, Philadelphia, PA	S.E.	14705	\$2,000
10/19/09	Jefferson Hospital, Philadelphia, PA	D.Hu.	14706	\$2,000
10/19/09	Broad & Sansom, Philadelphia, PA	S.E.	14701	\$1,956

9. In furtherance of the scheme, on or about October 16, 2009, defendant HAJAR MUHAMMAD cashed check no. 11172, that was drawn on the TD Bank account of Liberty News Distributors, and then made a photocopy of that check.

10. In furtherance of the scheme, at the direction of others unknown to the grand jury, check runners were transported to TD Bank branches in Pennsylvania and New Jersey to cash or deposit the following counterfeit checks, made payable to them, drawn on the TD Bank account of Liberty News Distributors. The transactions were as follows:

<u>DATE</u>	<u>LOCATION</u>	<u>CHECK CASHER</u>	<u>CHECK NO.</u>	<u>AMOUNT</u>
10/21/09	Pennsauken, NJ	Harmon Ford	112	\$15,931 deposited and withdrawn
10/21/09	University City, Philadelphia, PA	J.W.	112	\$1,931 attempt
10/21/09	University City, Philadelphia, PA	M.B.	112	\$1,942
11/02/09	Abington, PA	E.M	11858	\$346

11. In furtherance of the scheme, on or about October 16, 2009, defendant HAJAR MUHAMMAD cashed check no. 568, that was drawn on the TD Bank account of RSIA Incorporated, and then made a photocopy of that check.

12. In furtherance of the scheme, at the direction of others unknown to the grand jury, check runners were transported to TD Bank branches in Pennsylvania to cash the following counterfeit checks, made payable to them, drawn on the TD Bank account of RSIA Incorporated. The transactions were as follows:

<u>DATE</u>	<u>LOCATION</u>	<u>CHECK CASHER</u>	<u>CHECK NO.</u>	<u>AMOUNT</u>
11/09/09	Upper Darby, PA	T.M.	631	\$762
11/09/09	Ridley, PA	A.B.	632	\$768
11/09/09	Holmes, PA	A.B.	6313	\$764
11/09/09	Springfield, PA	T.M.	6314	\$768

13. In furtherance of the scheme, on or about October 20, 2009, defendant HAJAR MUHAMMAD cashed check no. 016472, that was drawn on the TD Bank account of PBA Construction, and then made a photocopy of that check.

14. In furtherance of the scheme, at the direction of others unknown to the grand jury, approximately six check runners were transported to TD Bank branches in Pennsylvania and New Jersey to cash or deposit the following counterfeit checks, made payable to them, drawn on the TD Bank account of PBA Construction. The transactions were as follows:

<u>DATE</u>	<u>LOCATION</u>	<u>CHECK CASHER</u>	<u>CHECK NO.</u>	<u>AMOUNT</u>
10/21/09	Pennsauken, NJ	Harmon Ford	16558	\$30,500 deposited, \$484 withdrawn

<u>DATE</u>	<u>LOCATION</u>	<u>CHECK CASHER</u>	<u>CHECK NO.</u>	<u>AMOUNT</u>
10/22/09	Philadelphia, PA	Anthony Myers	16535	\$9,100 deposited and withdrawn
10/22/09	Bensalem, PA	T.M.	16534	\$2,100
10/22/09	Feasterville, PA	Ava Martin	11533	\$2,100
10/22/09	Langhorne, PA	J.D.	16528	\$2,100
10/22/09	Bensalem, PA	K.G.	11532	\$2,100
10/22/09	Morrisville, PA	N.B.	11531	\$2,100

15. In furtherance of the scheme, at the direction of defendants KAREEM COMPTON and CHARLENE MARTIN HOLLIMAN, Tiana Alexander was transported from Philadelphia, Pennsylvania to a TD Bank branch in New Jersey to cash the following counterfeit check, made payable to her, drawn on the TD Bank account of JTP Management LLC Trucking Company. The transaction was as follows:

<u>DATE</u>	<u>LOCATION</u>	<u>CHECK CASHER</u>	<u>CHECK NO.</u>	<u>AMOUNT</u>
10/21/09	Cherry Hill, NJ	Tiana Alexander	4455	\$1,590

16. In furtherance of the scheme, on or about October 24, 2009, a teller at the TD Bank City Avenue branch, known to the grand jury, cashed check no, 1120, that was drawn on the TD Bank account of Neighbors, Inc. AWC, and, on or about October 25, 2009, defendant HAJAR MUHAMMAD photocopied that check.

17. In furtherance of the scheme, at the direction of others known and unknown to the grand jury, Troy Robinson, known to the grand jury and charged elsewhere, and D.Hu., known to the grand jury, were transported to TD Bank branches in New Jersey to cash the following counterfeit checks, made payable to them, drawn on the TD Bank account of Neighbors Inc, AWC. The transactions were as follows:

<u>DATE</u>	<u>LOCATION</u>	<u>CHECK CASHER</u>	<u>CHECK NO.</u>	<u>AMOUNT</u>
10/27/09	Cherry Hill, NJ	Troy Robinson	1162	\$2,400
10/27/09	Cherry Hill, NJ	D.Hu.	1160	\$2,400

18. In furtherance of the scheme, on or about October 26, 2009, defendant HAJAR MUHAMMAD cashed check no. 1068, that was drawn on the TD Bank account of the law firm of Green Silverstein and Groff, and then made a photocopy of that check.

19. In furtherance of the scheme, at the direction of others known and unknown to the grand jury, defendant JOSEPH MIDDLETON and other check runners were transported to TD Bank branches in Pennsylvania to cash the following counterfeit checks, made payable to them, drawn on the TD Bank account of Green Silverstein and Groff. The transactions were as follows:

<u>DATE</u>	<u>LOCATION</u>	<u>CHECK CASHER</u>	<u>CHECK NO.</u>	<u>AMOUNT</u>
11/02/09	Philadelphia, PA	D.S.	1129	\$2,400

<u>DATE</u>	<u>LOCATION</u>	<u>CHECK CASHER</u>	<u>CHECK NO.</u>	<u>AMOUNT</u>
11/02/09	Philadelphia, PA	T.B	1113	\$2,400
11/02/09	Philadelphia, PA	Gerald Bell	1116	\$2,400
11/02/09	Philadelphia, PA	Donald Flowers	1127	\$2,400
11/02/09	Philadelphia, PA	Donald Flowers	1118	\$2,400
11/02/09	Philadelphia, PA	Donald Flowers	1132	\$2,400
11/02/09	Philadelphia, PA	T.B.	1131	\$2,400
11/02/09	Philadelphia, PA	R.F.	1117	\$2,400
11/03/09	Philadelphia, PA	Donald Flowers	1155	\$2,400
11/03/09	Philadelphia, PA	M.W.	1152	\$2,400
11/03/09	Royersford, PA	Joseph Middleton	1140	\$2,400
11/03/09	Collegeville, PA	Joseph Middleton	1133	\$2,400
11/04/09	Philadelphia, PA	R.F.	1153	\$2,400
11/04/09	Philadelphia, PA	Donald Flowers	1159	\$2,400
11/08/09	Philadelphia, PA	Gerald Bell	98237	\$2,400 attempt

20. In furtherance of the scheme, at the direction of defendants KAREEM COMPTON, HAROLD GOODMAN and VINCENT WILLIAMS, check runners Rashonda Ellis and Ashley Wells were transported from Philadelphia,

Pennsylvania to TD Bank branches to cash the following counterfeit checks, made payable to them, drawn on the TD Bank account of Edelstein Law LLP. The transactions were as follows:

<u>DATE</u>	<u>LOCATION</u>	<u>CHECK CASHER</u>	<u>CHECK NO.</u>	<u>AMOUNT</u>
10/27/09	Bensalem, PA	Rashonda Ellis	6981	\$2,100
10/27/09	Langhorne, PA	Ashley Wells	6797	\$2,100 attempt

21. In furtherance of the scheme, on or about November 1, 2009, defendant HAJAR MUHAMMAD processed the deposit of check no. 3273, that was drawn on the TD Bank account of Boys' Latin of Philadelphia Charter School, and made a photocopy of that check.

22. In furtherance of the scheme, defendant JOSEPH MIDDLETON and approximately two other check runners were transported to TD Bank branches in Pennsylvania, New Jersey and New York to cash the following counterfeit checks, made payable to them, drawn on the TD Bank account of Boys' Latin of Philadelphia Charter School. The transactions were as follows:

<u>DATE</u>	<u>LOCATION</u>	<u>CHECK CASHER</u>	<u>CHECK NO.</u>	<u>AMOUNT</u>
11/05/09	Flemington, NJ	Joseph Middleton	3336	\$2,400
11/05/09	Plainview, NY	D.S.	3390	\$2,400 attempt
11/05/09	Philadelphia, PA	S.L.	3346	\$2,400

<u>DATE</u>	<u>LOCATION</u>	<u>CHECK CASHER</u>	<u>CHECK NO.</u>	<u>AMOUNT</u>
11/05/09	Philadelphia, PA	N.P.	3347	\$2,400
11/05/09	Philadelphia, PA	D.S.	3351	\$2,400
11/06/09	Marlton, NJ	G.F.	3345	\$2,400
11/06/09	Marlton, NJ	Joseph Middleton	3379	\$2,400 attempt

23. In furtherance of the scheme, on or about November 1, 2009, defendant HAJAR MUHAMMAD processed the deposit of check no. 2747, that was drawn on the TD Bank personal account of S.R., and made a photocopy of that check.

24. In furtherance of the scheme, at the direction of defendants KAREEM COMPTON, CHARLENE MARTIN HOLLIMAN and HAROLD GOODMAN and others unknown to the grand jury, Dionna Hayes, Khouri McKenzie, Lakera Steward, Raetiana Williams and Alesha Williams were transported from Philadelphia, Pennsylvania to TD Bank branches in Pennsylvania and New Jersey to cash the following counterfeit checks, made payable to them, drawn on the TD Bank account of S.R. The transactions were as follows:

<u>DATE</u>	<u>LOCATION</u>	<u>CHECK CASHER</u>	<u>CHECK NO.</u>	<u>AMOUNT</u>
11/06/09	Ganttown, NJ	Dionna Hayes	2823	\$1,600
11/06/09	Ganttown, NJ	Khouri McKenzie	2824	\$1,732

<u>DATE</u>	<u>LOCATION</u>	<u>CHECK CASHER</u>	<u>CHECK NO.</u>	<u>AMOUNT</u>
11/06/09	Cross Keys, NJ	Derricka Hayes	2825	\$1,721 attempt
11/06/09	Pennsauken, NJ	Lakera Steward	2829	\$1,721
11/06/09	Holmes, PA	Raetiana Williams	2793	\$994
11/06/09	Holmes, PA	Alesha Williams	2791	\$989

25. In furtherance of the scheme, at the direction of defendants KAREEM COMPTON, CHARLENE MARTIN HOLLIMAN and HAROLD GOODMAN, check runners Khouri McKenzie, Derricka Hayes, Dominique Hayes, Lakera Steward, and P.B. were transported to TD Bank branches in New Jersey to cash the following counterfeit checks, made payable to them, drawn on the TD Bank account of Stop & Surrender Inc., and with the purported signature of E.W., an authorized signer for Stop & Surrender Inc. The transactions were as follows:

<u>DATE</u>	<u>LOCATION</u>	<u>CHECK CASHER</u>	<u>CHECK NO.</u>	<u>AMOUNT</u>
11/05/09	Williamstown, NJ	Khouri McKenzie	3542	\$1,800
11/06/09	Ganttown, NJ	Khouri McKenzie	3595	\$1,800
11/08/09	Ganttown, NJ	Derricka Hayes	3596	\$1,800
11/08/09	Sicklerville, NJ	Dominique Hayes	3597	\$1,800
11/09/09	Voorhees, NJ	Lakera Steward	3610	\$2,162
11/09/09	Willow Ridge, NJ	P.B.	3611	\$2,139

26. In furtherance of the scheme, on or about November 23, 2009, defendant HAJAR MUHAMMAD cashed check no. 13150, that was drawn on the TD Bank account of DNA Ambulance Inc., and made a photocopy of that check.

27. In furtherance of the scheme, at the direction of others unknown to the grand jury, a check runner was transported to a TD Bank branch in New Jersey to cash the following counterfeit check, made payable to him or her, drawn on the TD Bank account of DNA Ambulance Inc. The transaction was as follows:

<u>DATE</u>	<u>LOCATION</u>	<u>CHECK</u> <u>CASHER</u>	<u>CHECK</u> <u>NO.</u>	<u>AMOUNT</u>
11/25/09	Camden, NJ	L.M.	13183	\$1,951

28. In furtherance of the scheme, on or about November 23, 2009, defendant HAJAR MUHAMMAD cashed check no. 2381, that was drawn on the TD Bank account of Capozzoli Catering of Chester County, Inc., and made a photocopy of that check.

29. In furtherance of the scheme, at the direction of defendants KAREEM COMPTON, CHARLENE MARTIN HOLLIMAN and others unknown to the grand jury, Ava Martin and M.R. and T.R., known to the grand jury, were transported to TD Bank branches in Pennsylvania to cash the following counterfeit checks, made payable to them, drawn on the TD Bank account of Capozzoli Catering of Chester County, Inc. The transactions were as follows:

<u>DATE</u>	<u>LOCATION</u>	<u>CHECK CASHER</u>	<u>CHECK NO.</u>	<u>AMOUNT</u>
11/25/09	Hatfield, PA	M.R.	2435	\$2,382
11/25/09	Horsham, PA	T.R.	2431	\$2,346
11/25/09	S. Doylestown, PA	M.R.	2436	\$2,356
11/27/09	Horsham, PA	Ava Martin	2433	\$2,321

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

**COUNT THREE**

**THE GRAND JURY FURTHER CHARGES THAT:**

At all times material to this indictment:

1. Wachovia Bank was a financial institution conducting business in the Eastern District of Pennsylvania and elsewhere, the deposits of which were insured by the Federal Deposit Insurance Corporation, certificate number 33869.

2. On or about October 29, 2009, defendant

**JOSEPH MIDDLETON**

knowingly executed, 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 that bank by means of false and fraudulent pretenses, representations, and promises.

**THE SCHEME**

3. Defendant JOSEPH MIDDLETON used stolen account information to fraudulently obtain money from Wachovia Bank.

4. In furtherance of the scheme, on or about October 29, 2009, defendant JOSEPH MIDDLETON attempted to cash a fraudulent check, in the amount of \$1,700, made payable to him and drawn on the Wachovia Bank account of S.S. at a Wachovia Bank branch located in Philadelphia, Pennsylvania.

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

**COUNT FOUR**

**THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:**

1. Paragraphs 1, 2 and 4 through 8, and Overt Acts 1 and 2 of Count One, and paragraphs 3 through 5, 7 and 8 of Count Two are realleged here.

2. From on or about October 14, 2009 through on or about October 15, 2009, in the Eastern District of Pennsylvania and the District of New Jersey, defendants

**HAJAR MUHAMMAD,  
KAREEM COMPTON,  
CHARLENE MARTIN HOLLIMAN,  
a/k/a "Sugarpooh," and  
HAROLD GOODMAN,  
a/k/a "J,"  
a/k/a "Bamboo"**

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

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

**COUNT FIVE**

**THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:**

1. Paragraphs 1, 2 and 4 through 8, and Overt Acts 1 and 2 of Count One, and paragraphs 3 through 5, 23 and 24 of Count Two are realleged here.

2. On or about November 6, 2009, in the Eastern District of Pennsylvania and the District of New Jersey, defendants

**HAJAR MUHAMMAD,  
KAREEM COMPTON,  
CHARLENE MARTIN HOLLIMAN,  
a/k/a "Sugarpooh," and  
HAROLD GOODMAN,  
a/k/a "J,"  
a/k/a "Bamboo"**

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

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

**COUNT SIX**

**THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:**

1. Paragraphs 1, 2 and 4 through 8, and Overt Acts 1 and 2 of Count One, and paragraphs 3 through 5, and 25 of Count Two are realleged here.

2. From on or about November 5, 2009 through on or about November 9, 2009, in the Eastern District of Pennsylvania and the District of New Jersey, defendants

**KAREEM COMPTON,  
CHARLENE MARTIN HOLLIMAN,  
a/k/a "Sugarpooh," and  
HAROLD GOODMAN,  
a/k/a "J,"  
a/k/a "Bamboo"**

knowingly and without lawful authority, transferred, possessed and used, and aided and abetted the transfer, possession, and use of, a means of identification of another person, that is, the name of E.W., during and in relation to bank fraud.

In violation of Title 18, United States Code, Sections 1028A(a)(1), (c)(5) 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 and 1344, set forth in this indictment, defendant

**HAJAR MUHAMMAD,  
JOSEPH MIDDLETON,  
KAREEM COMPTON,  
CHARLENE MARTIN HOLLIMAN,  
a/k/a "Sugarpooh,"  
HAROLD GOODMAN,  
a/k/a "J,"  
a/k/a "Bamboo,"  
VINCENT WILLIAMS,  
a/k/a "Umar,"  
NATASHA GILLIAM,  
a/k/a "Tasha," and  
HARMON FORD**

shall forfeit to the United States of America any property, real or personal, that constitutes or is derived from proceeds traceable to the commission of such offenses, as charged in this information, including, but not limited to, the sum of \$157,520.

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:**

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**GRAND JURY FOREPERSON**

  
**ZANE DAVID MEMEGER**  
**United States Attorney**