

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

UNITED STATES OF AMERICA	:	CRIMINAL NO. 11-_____
v.	:	DATE FILED: <u>October 27, 2011</u>
LAWRENCE FUDGE,	:	VIOLATIONS:
 a/k/a "Larry Fudge,"	:	18 U.S.C. § 371 (conspiracy - 1 count)
SHAWN ROBINSON,	:	18 U.S.C. § 1344 (bank fraud - 6 counts)
RICHARD WILLIAMS,	:	18 U.S.C. § 1029 (access device fraud - 8
 a/k/a "Microwave"	:	counts)
	:	18 U.S.C. § 1028A (aggravated identity
	:	theft - 18 counts)
	:	18 U.S.C. § 2 (aiding & abetting)
	:	Notice of Forfeiture

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

At all times material to this indictment:

1. The following were financial institutions, the deposits of which were insured by the Federal Deposit Insurance Corporation:

- a) PNC Bank;
- b) Citizens Bank;
- c) Commerce Bank;
- d) Wachovia Bank;
- e) Sovereign Bank; and
- f) Bank of America.

2. From on or about December 1, 2006 through on or about July 30, 2011, in Philadelphia, in the Eastern District of Pennsylvania and elsewhere, defendant

**LAWRENCE FUDGE,
a/k/a "Larry Fudge,"
SHAWN ROBINSON and
RICHARD WILLIAMS,
a/k/a "Microwave"**

conspired and agreed, together and 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 PNC Bank, Citizens Bank, Commerce Bank, Wachovia Bank, Sovereign Bank, and Bank of America, in violation of Title 18, United States Code, Section 1344, to knowingly and with intent to defraud effect fraudulent transactions with credit issued to other people, in violation of Title 18, United States Code, Section 1029, and to knowingly and without lawful authority use a means of identification of another person, during and in relation to bank fraud and access device fraud, in violation of Title 18, United States Code, Section 1028A(a)(1), (c)(5).

MANNER AND MEANS

3. Defendants LAWRENCE FUDGE, SHAWN ROBINSON and RICHARD WILLIAMS and their co-conspirators used stolen identification information to fraudulently withdraw money from victims' bank accounts and to fraudulently obtain retail store credit cards in victims' names and make purchases with those fraudulently-obtained cards.

4. Defendants LAWRENCE FUDGE and RICHARD WILLIAMS recruited individuals who had access to personal and bank account information, such as insurance company and bank employees, to provide them with names, addresses, dates of birth, social security numbers, and bank account numbers of victims.

5. With the stolen personal and bank account information, defendant LAWRENCE FUDGE arranged for the manufacture of false photographic identifications in the victims' names, using the picture of individuals recruited to act as "check runners," for use in the making of fraudulent transactions against the victims' bank accounts and the obtaining of fraudulent retail store credit cards in the victims' names.

6. Armed with false identification documents, the check-runners posed as the victims to make fraudulent transactions against the victims' bank accounts and to make purchases using fraudulent credit cards obtained in the victims' names.

OVERT ACTS

In furtherance of the conspiracy, defendant LAWRENCE FUDGE, SHAWN ROBINSON and RICHARD WILLIAMS and their co-conspirators committed the following overt acts in the Eastern District of Pennsylvania and elsewhere:

1. Defendant LAWRENCE FUDGE recruited Dennis Clark II, an employee of Prudential Insurance and charged elsewhere, to provide the names, addresses, dates of birth, social security numbers, and bank names and account numbers for Prudential Insurance customers.

2. Between on or about December 1, 2006 and on or about September 20, 2007, Clark provided defendant LAWRENCE FUDGE and others with Prudential Insurance customers' bank account and personal information, including names, social security numbers, dates of birth, bank name, and bank account number.

3. Clark used his position at Prudential Insurance to improperly access computerized information for Prudential Insurance customers, including T.P., K.H., C.J., W.S., C.C., D.W., T.C., R.L. and T.H., known to the grand jury, and then provided the names, addresses, social security numbers, dates of birth, and bank account information of these Prudential customers to defendant LAWRENCE FUDGE and others.

4. Defendant LAWRENCE FUDGE paid Clark approximately \$2,000 for the Prudential Insurance customer information that Clark provided.

5. Defendant LAWRENCE FUDGE arranged for the manufacture of fraudulent driver's licenses, using the names and personal information of the Prudential Insurance Company customers provided to him by Clark, including the names and personal information of T.P., K.H., C.J., W.S., C.C., D.W., T.C., R.L. and T.H.

6. Defendants LAWRENCE FUDGE and SHAWN ROBINSON recruited Kevin Johnson, charged elsewhere, to make fraudulent transactions from on or about December 22, 2006 to on or about July 1, 2008 against the accounts of customers of PNC Bank, Citizens Bank, Commerce Bank and Bank of America, and to obtain a fraudulent Lowe's credit card in the name of Ke.L., known to the grand jury, and then make purchases using that fraudulently-obtained Lowe's credit card.

7. Defendant LAWRENCE FUDGE recruited John Virgil Slade, charged elsewhere, to make fraudulent transactions from on or about May 15, 2007 to on or about August 2, 2007 against the bank accounts of Prudential Insurance company customers, including T.P., K.H., C.J., W.S., C.C., and D.W., and others, and to obtain fraudulent retail store credit cards in the names of C.J., C.C. and D.W., and to then purchases using those fraudulently-obtained retail

store credit cards.

8. Defendant LAWRENCE FUDGE recruited Christopher Brophy, a branch manager for Citizens Bank at a branch located in Horsham, Montgomery County, Pennsylvania and charged elsewhere, to provide names, addresses, dates of birth, and account numbers, as well as account balance information, for customers of Citizens Bank.

9. On or about January 16, 2008, Brophy accessed the Citizens Bank account of K.L., known to the grand jury, without authorization and then provided defendant LAWRENCE FUDGE with K.L.'s account number, name, address, date of birth, and account balance as payment for cocaine supplied by defendant FUDGE to Brophy.

10. Defendant LAWRENCE FUDGE recruited Rhoda Caldwell, who was supplied with illegal drugs by defendant FUDGE and who is charged elsewhere, to make fraudulent transactions against the account of K.L. from on or about February 1, 2008 to on or about February 8, 2008.

11. Defendants LAWRENCE FUDGE and SHAWN ROBINSON recruited Donald Hartwell, charged elsewhere, to obtain fraudulent retail store credit cards on or about March 5, 2008 in the name of A.G., known to the grand jury, and then make purchases using those fraudulently-obtained retail store credit cards.

12. Defendant RICHARD WILLIAMS recruited Nataya Lloyd, an employee of Commerce Bank at a branch located in Conshohocken, Montgomery County, Pennsylvania and charged elsewhere, to provide names, addresses, dates of birth, and account numbers, as well as account balance information, for customers of Commerce Bank.

13. From on or about May 22, 2008 to on or about June 6, 2008, Nataya Lloyd used her position with Commerce Bank to improperly acquire account information for Commerce Bank accounts belonging to R.T., A.S, C.T., C.F., and R.W.

14. Nataya Lloyd then gave that account information, including account numbers, to defendant RICHARD WILLIAMS, who, with defendant LAWRENCE FUDGE, used that information from on or about May 28, 2008 to on or about June 27, 2008 to fraudulently take and attempt to take approximately \$21,250 from Commerce Bank by withdrawing money from, and cashing fraudulent checks on, accounts belonging to R.T., A.S., C.T., C.F., and R.W.

15. Armed with false identification and at the direction of defendants LAWRENCE FUDGE, SHAWN ROBINSON and RICHARD WILLIAMS, check-runners John Virgil Slade, Kevin Johnson, Rhoda Caldwell and Anthony Smith, charged elsewhere, posed as customers of banks to make or attempt to make fraudulent transactions against those bank customers' accounts, totaling an amount in excess of approximately \$148,000.

16. Defendants LAWRENCE FUDGE and SHAWN ROBINSON recruited Charles Moore, charged elsewhere, to obtain fraudulent retail store credit cards from on or about October 8, 2010 to on or about November 5, 2010 in the names of T.C., R.L. and E.S., known to the grand jury, and then make purchases using those fraudulent retail store credit cards.

17. Defendants LAWRENCE FUDGE and SHAWN ROBINSON recruited Co-Conspirator 1, unknown to the grand jury, to obtain fraudulent retail store credit cards from on or about July 3, 2010 to on or about October 8, 2010 in the names of W.H., T.H., and A.P., known to the grand jury, and then make purchases using those fraudulent retail store credit cards.

18. From on or about June 5, 2007 to on or about November 5, 2010, armed with false identification and at the direction of defendant LAWRENCE FUDGE and SHAWN ROBINSON, check-runners John Virgil Slade, Kevin Johnson, Donald Hartwell, Charles Moore, Co-Conspirator 1, and others unknown to the grand jury fraudulently obtained retail store credit cards in the names of other individuals and made or attempted to make purchases against those fraudulently-obtained retail store credit cards totaling an amount in excess of approximately \$42,000.

19. On or about August 30, 2011, defendant LAWRENCE FUDGE possessed fraudulent Pennsylvania driver's licenses in the names of E.R., P.V., L.B., and personal identifying information, including name, address, date of birth and social security number for M. We., M.Wi., C.Y., and C.B.

20. On or about August 30, 2011, defendant SHAWN ROBINSON possessed bank account and personal identifying information, including name, address and social security number for W.F. and B.L., both customers of Citibank.

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

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 and 3 through 6, and Overt Acts 1 through 7 and 15 of Count One are incorporated here.
2. From on or about December 22, 2006 to on or about June 21, 2007, in the Eastern District of Pennsylvania, defendant

**LAWRENCE FUDGE,
a/k/a "Larry Fudge,"
and
SHAWN ROBINSON**

knowingly executed, and aided and abetted the execution of, a scheme to defraud PNC 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. Defendants LAWRENCE FUDGE and SHAWN ROBINSON used stolen account information for JEVS Supports for Independence and created false identification documents in the names of D.H. and K.L. to fraudulently withdraw money from the PNC Bank business account of JEVS Supports for Independence and share the proceeds with others.
4. In furtherance of the scheme and at the direction of defendants LAWRENCE FUDGE and SHAWN ROBINSON, Kevin Johnson, using fraudulent identification documents in the name of J.B., cashed fraudulent checks against the PNC Bank business account of JEVS Supports for Independence at PNC Bank branches in Philadelphia, Pennsylvania:

<u>DATES</u>	<u>LOCATION OF BRANCHES</u>	<u>TOTAL AMOUNTS OF TRANSACTIONS</u>
12/22/06	Philadelphia, PA	\$2,952

5. In furtherance of the scheme and at the direction of defendants LAWRENCE FUDGE and SHAWN ROBINSON, Johnson, using fraudulent identification documents in the name of P.K., cashed fraudulent checks against the PNC Bank business account of JEVS Supports for Independence at PNC Bank branches in Philadelphia, Pennsylvania:

<u>DATES</u>	<u>LOCATION OF BRANCHES</u>	<u>TOTAL AMOUNTS OF TRANSACTIONS</u>
12/26/06 to 01/02/07	Philadelphia, PA	\$7,121

6. In furtherance of the scheme and at the direction of defendant LAWRENCE FUDGE, on or about June 21, 2007, John Virgil Slade, using stolen account information and fraudulent identification documents in the name of Prudential Insurance and PNC Bank customer W.S., attempted to fraudulently withdraw funds in the amount of approximately \$2,500 from the account of PNC Bank account of W.S. at a PNC Bank branch in Flourtown, Pennsylvania

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

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 and 3 through 6, and Overt Acts 1 through 5, 7 through 10 and 15 of Count One are incorporated here.

2. From on or about March 13, 2007 through on or about February 8, 2008, in the Eastern District of Pennsylvania, defendants

**LAWRENCE FUDGE,
a/k/a "Larry Fudge,"
and
SHAWN ROBINSON**

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

THE SCHEME

3. Defendant LAWRENCE FUDGE used stolen account information and false identification documents of D.H., T.P., and K.L., account holders of Citizens Bank, to fraudulently withdraw money from the accounts of D.H., T.P., and K.L. and share the proceeds with others.

4. In furtherance of the scheme and at the direction of defendant LAWRENCE FUDGE, on or about March 13, 2007, using stolen account information and fraudulent identification documents in the name of D.H., Kevin Johnson attempted to make a fraudulent withdrawal in the amount of \$700 from the Citizens Bank account of D.H. at a Citizens Bank branch in Philadelphia, Pennsylvania.

5. In furtherance of the scheme and at the direction of defendant LAWRENCE FUDGE, John Virgil Slade, using stolen account information and fraudulent identification documents in the name of Prudential Insurance and Citizens Bank customer T.P., made the following fraudulent withdrawals from T.P.'s account at Citizens Bank:

<u>DATE</u>	<u>LOCATION OF BRANCHES</u>	<u>VICTIM ACCOUNT HOLDER</u>	<u>AMOUNT</u>
5/15/07 to 5/31/07	Philadelphia, PA	T.P.	\$1,200 \$1,500 attempt

6. In furtherance of the scheme and at the direction of defendant LAWRENCE FUDGE, Rhoda Caldwell, using stolen account information and fraudulent identification documents of Citizens Bank customer K.L., made and attempted to make the following fraudulent withdrawals from K.L.'s account at Citizens Bank:

<u>DATE</u>	<u>LOCATION OF BRANCHES</u>	<u>VICTIM ACCOUNT HOLDER</u>	<u>AMOUNT</u>
2/01/08 to 2/08/08	Philadelphia, PA	K.L.	\$29,300 \$1,900 attempt

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

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 and 3 through 6, and Overt Acts 12 through 15 of Count One are incorporated here.
2. From on or about May 22, 2007 to on or about June 27, 2008, in the Eastern District of Pennsylvania and elsewhere, defendant

**LAWRENCE FUDGE,
a/k/a "Larry Fudge,"
SHAWN ROBINSON and
RICHARD WILLIAMS,
a/k/a "Microwave"**

knowingly executed and attempted to execute a scheme to defraud Commerce 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. Defendants LAWRENCE FUDGE, SHAWN ROBINSON and RICHARD WILLIAMS used stolen account information and false identification documents of account holders of Commerce Bank to fraudulently withdraw and attempt to withdraw money from the accounts of those Commerce Bank account holders and share the proceeds with others.
4. In furtherance of the scheme and at the direction of defendants LAWRENCE FUDGE and SHAWN ROBINSON, using stolen account information provided by defendant RICHARD WILLIAMS and fraudulent identification documents in the names of the Commerce Bank customers, Kevin Johnson made and attempted to make the following fraudulent withdrawals:

<u>DATE</u>	<u>LOCATION OF BRANCHES</u>	<u>VICTIM ACCOUNT HOLDER</u>	<u>AMOUNT</u>
6/03/08 to 6/08/08	Conshohocken, PA Philadelphia, PA	A.S.	\$4,750
6/07/08	Mount Laurel, NJ	R.W.	\$3,000 attempt
6/06/08 to 6/10/08	Philadelphia, PA	C.F.	\$3,600 \$900 attempt

4. In furtherance of the scheme and at the direction of defendants

LAWRENCE FUDGE and SHAWN ROBINSON, using stolen account information provided by defendant RICHARD WILLIAMS and fraudulent identification documents in the names of Commerce Bank customer C.T., Anthony Smith made the following fraudulent withdrawal:

<u>DATE</u>	<u>LOCATION OF BRANCH</u>	<u>VICTIM ACCOUNT HOLDER</u>	<u>AMOUNT</u>
6/02/08	Philadelphia, PA	C.T.	\$3,200

5. In furtherance of the scheme and at the direction of defendant

LAWRENCE FUDGE, using stolen account information provided by defendant RICHARD WILLIAMS, Dennis Clark and others and fraudulent identification documents in the names of the Commerce Bank customers, John Virgil Slade made and attempted to make the following fraudulent withdrawals:

<u>DATE</u>	<u>LOCATION OF BRANCHES</u>	<u>VICTIM ACCOUNT HOLDER</u>	<u>AMOUNT</u>
5/22/07 to 5/24/07	Flourtown, PA Conshohocken, PA Philadelphia, PA	K.H.	\$8,500 \$3,500 attempt
5/28/08	Pennsauken, NJ	R.T.	\$2,500 deposit \$1,500

<u>DATE</u>	<u>LOCATION OF BRANCHES</u>	<u>VICTIM ACCOUNT HOLDER</u>	<u>AMOUNT</u>
6/15/08 to 6/16/08	Sicklerville, NJ Cherry Hill, NJ	J.Bu.	\$1,500 \$1,500 attempt
6/24/08	Cherry Hill, NJ	R.C.M.	\$550
6/24/08	Runnemede, NJ	T.M.	\$1,500 \$1,500 attempt
6/27/08	Conshohocken, PA	F.T.	\$4,539 deposit \$1,500 attempt

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

COUNT FIVE

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 and 3 through 6, and Overt Acts 1 through 5, 7 and 15 of Count One are incorporated here.

2. From on or about May 30, 2007 to on or about June 5, 2007, in the Eastern District of Pennsylvania, defendant

**LAWRENCE FUDGE,
a/k/a Larry Fudge**

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. Defendant LAWRENCE FUDGE used stolen account information and false identification documents of Prudential Insurance Bank customer C.J., who was a Wachovia Bank account holder, to fraudulently withdraw money from the account of C.J. and share the proceeds with others.

4. In furtherance of the scheme and at the direction of defendant LAWRENCE FUDGE, John Virgil Slade made the following fraudulent withdrawals:

<u>DATE</u>	<u>LOCATION OF BRANCHES</u>	<u>VICTIM ACCOUNT HOLDER</u>	<u>AMOUNT</u>
5/30/07 to 6/05/07	Philadelphia, PA	C.J.	\$3,425

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

COUNT SIX

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 and 3 through 6, and Overt Acts 1 through 5, 7 and 15 of Count One are incorporated here.

2. From on or about July 21, 2007 through on or about August 1, 2007, in the Eastern District of Pennsylvania, defendant

**LAWRENCE FUDGE,
a/k/a Larry Fudge**

knowingly executed, and aided and abetted the execution of, a scheme to defraud Sovereign 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 LAWRENCE FUDGE used stolen account information and false identification documents of Prudential Insurance customers C.C. and D.W., who were Sovereign Bank account holders, to withdraw funds from the Sovereign Bank accounts of C.C. and D.W. and share the proceeds with others.

4. In furtherance of the scheme and at the direction of defendant LAWRENCE FUDGE, John Virgil Slade made the following fraudulent withdrawals:

<u>DATE</u>	<u>LOCATION OF BRANCHES</u>	<u>VICTIM ACCOUNT HOLDER</u>	<u>AMOUNT</u>
7/21/07	Philadelphia, PA	C.C.	\$2,400
7/31/07 to 8/01/07	Philadelphia, PA	D.W.	\$18,700

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

COUNT SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 and 3 through 6, and Overt Acts 6 and 15 of Count One are incorporated here.
2. From on or about June 29, 2008 to on or about July 1, 2008, in the Eastern District of Pennsylvania and the District of New Jersey, defendant

**LAWRENCE FUDGE,
a/k/a "Larry Fudge," and
SHAWN ROBINSON**

knowingly executed, and aided and abetted the execution of, a scheme to defraud Bank of America, 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. Defendants LAWRENCE FUDGE and SHAWN ROBINSON used stolen account information and false identification documents of Ke.L., an account holder of Bank of America, to fraudulently obtain a debit card for the Bank of America account of Ke.L. and to fraudulently withdraw money from the account of Ke.L. and share the proceeds with others.

4. In furtherance of the scheme and at the direction of defendants LAWRENCE FUDGE and SHAWN ROBINSON, Kevin Johnson, using stolen account information and fraudulent identification documents in the name of Ke.L., made the following fraudulent withdrawals from the Bank of America account of Ke.L.:

<u>DATE</u>	<u>LOCATION OF BRANCHES</u>	<u>VICTIM ACCOUNT HOLDER</u>	<u>AMOUNT</u>
06/30/08	Spring House, PA Wyncote, PA Philadelphia, PA	Ke.L.	\$5,400

4. In furtherance of the scheme and at the direction of defendants

LAWRENCE FUDGE and SHAWN ROBINSON, on or about June 30, 2008 and on or about July 1, 2008, Kevin Johnson, using stolen account information and an unauthorized debit card in the name of Ke.L., attempted to make withdrawals totaling approximately \$27,230 from ATM machines in Atlantic City, New Jersey and Philadelphia, Pennsylvania

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

COUNT EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 3 through 6, and Overt Acts 6 and 18 of Count One are incorporated here.

2. From on or about June 29, 2008 to on or about June 30, 2008, in Philadelphia, Pennsylvania, in the Eastern District of Pennsylvania, defendant

**LAWRENCE FUDGE,
a/k/a "Larry Fudge"**

knowingly and with the intent to defraud, directed, and aided and abetted, Kevin Johnson in effecting a transaction with an access device, that is, a Lowe's credit card in the name of Ke.L., to obtain things of value aggregating \$1,000 or more during a one-year period, for a total of at least \$2,484, thereby affecting interstate commerce.

In violation of Title 18, United States Code, Sections 1029(a)(5) and 2.

COUNT NINE

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 3 through 6, and Overt Acts 7 and 18 of Count One are incorporated here.

2. On or about June 5, 2007 to on or about June 9, 2007, in Philadelphia, Pennsylvania, in the Eastern District of Pennsylvania, defendant

**LAWRENCE FUDGE,
a/k/a "Larry Fudge"**

knowingly and with the intent to defraud, directed, and aided and abetted, John Virgil Slade in effecting a transaction with an access device, that is, a Macy's credit card, ending in 4270, in the name of C.J., to obtain things of value aggregating \$1,000 or more during a one-year period, for a total of at least \$2,357, thereby affecting interstate and foreign commerce.

In violation of Title 18, United States Code, Sections 1029(a)(5) and 2.

COUNT TEN

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 3 through 6, and Overt Acts 7 and 18 of Count One are incorporated here.

2. On or about July 21, 2007, in Philadelphia, Pennsylvania, in the Eastern District of Pennsylvania, defendant

**LAWRENCE FUDGE,
a/k/a "Larry Fudge"**

knowingly and with the intent to defraud, directed, and aided and abetted, John Virgil Slade in effecting a transaction with an access device, that is, a Sears credit card, ending in 6536, in the name of C.C., to obtain things of value aggregating \$1,000 or more during a one-year period, for a total of at least \$7,674, thereby affecting interstate and foreign commerce.

In violation of Title 18, United States Code, Sections 1029(a)(5) and 2.

COUNT ELEVEN

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 3 through 6, and Overt Acts 7 and 18 of Count One are incorporated here.

2. On or about August 2, 2007, in Philadelphia, Pennsylvania, in the Eastern District of Pennsylvania, defendant

**LAWRENCE FUDGE,
a/k/a "Larry Fudge"**

knowingly and with the intent to defraud, directed, and aided and abetted, John Virgil Slade in effecting a transaction with an access device, that is, Best Buy line of instant credit, in the name of D.W., to obtain things of value aggregating \$1,000 or more during a one-year period, for a total of at least \$2,925, thereby affecting interstate and foreign commerce.

In violation of Title 18, United States Code, Sections 1029(a)(5) and 2.

COUNT TWELVE

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 3 through 6, and Overt Acts 11 and 18 of Count One are incorporated here.
2. On or about March 5, 2008, in Philadelphia, Pennsylvania, in the Eastern District of Pennsylvania, defendant

**LAWRENCE FUDGE,
a/k/a "Larry Fudge,"
and
SHAWN ROBINSON**

knowingly and with the intent to defraud, directed, and aided and abetted, Donald Hartwell in effecting a transaction with an access device, that is, a Best Buy credit card, with an account number ending in 6854, in the name of A.G., 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 \$4,707, thereby affecting interstate commerce.

In violation of Title 18, United States Code, Sections 1029(a)(5) and 2.

COUNT THIRTEEN

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 3 through 6, and Overt Acts 16 and 18 of Count One are incorporated here.
2. On or about October 8, 2010, in the Eastern District of Pennsylvania and elsewhere, defendant

**LAWRENCE FUDGE,
a/k/a "Larry Fudge," and
SHAWN ROBINSON**

knowingly and with the intent to defraud, directed, and aided and abetted, Charles Moore in effecting 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, Sections 1029(a)(5) and 2.

COUNT FOURTEEN

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 3 through 6, and Overt Acts 16 and 18 of Count One are incorporated here.
2. On or about October 8, 2010, in the Eastern District of Pennsylvania and elsewhere, defendant

**LAWRENCE FUDGE,
a/k/a "Larry Fudge," and
SHAWN ROBINSON**

knowingly and with the intent to defraud, directed, and aided and abetted, Charles Moore in effecting 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, Sections 1029(a)(5) and 2.

COUNT FIFTEEN

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 3 through 6, and Overt Acts 16 and 18 of Count One are incorporated here.
2. On or about October 8, 2010, in the Eastern District of Pennsylvania and elsewhere, defendant

**LAWRENCE FUDGE,
a/k/a "Larry Fudge," and
SHAWN ROBINSON**

knowingly and with the intent to defraud, directed, and aided and abetted, Charles Moore in effecting 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, Sections 1029(a)(5) and 2.

COUNTS SIXTEEN THROUGH TWENTY-ONE

THE GRAND JURY FURTHER CHARGES THAT:

From on or about December 22, 2006 to on or about October 8, 2010, in the Eastern District of Pennsylvania and elsewhere, defendants

**LAWRENCE FUDGE,
a/k/a "Larry Fudge,"
and
SHAWN ROBINSON**

knowingly and without lawful authority, transferred and used, and aided and abetted the use of, a means of identification of another person, that is, the use of the name and personal identifying information of the persons indicated below, each person constituting a separate count, during and in relation to bank fraud.

<u>COUNT</u>	<u>DATE</u>	<u>VICTIM</u>
16	12/22/06	J.B.
17	12/26/06	P.K.
18	06/30/08	Ke.L.
19	03/05/08	A.G.
20	10/08/10	R.L.
21	10/08/10	T.C.

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

and 2.

COUNTS TWENTY-TWO THROUGH TWENTY-FIVE

THE GRAND JURY FURTHER CHARGES THAT:

From on or about May 28, 2008 to on or about June 8, 2008, in the Eastern District of Pennsylvania and elsewhere, defendants

**LAWRENCE FUDGE,
a/k/a "Larry Fudge,"
SHAWN ROBINSON,
and
RICHARD WILLIAMS**

knowingly and without lawful authority, transferred and used, and aided and abetted the use of, a means of identification of another person, that is, the use of the name and personal identifying information of the persons indicated below, each person constituting a separate count, during and in relation to bank fraud.

<u>COUNT</u>	<u>DATE</u>	<u>VICTIM</u>
22	05/28/08	R.T.
23	06/03/08	A.S.
24	06/06/08	C.F.
24	06/07/08	R.W.

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

COUNT TWENTY-SIX

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 2, 2008, in the Eastern District of Pennsylvania, defendants

**LAWRENCE FUDGE,
a/k/a "Larry Fudge,"
and
RICHARD WILLIAMS**

knowingly and without lawful authority, transferred and used, and aided and abetted the use of, a means of identification of another person, that is, the use of the name and personal identifying information of C.T., during and in relation to bank fraud.

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

and 2.

COUNTS TWENTY-SEVEN THROUGH THIRTY-THREE

THE GRAND JURY FURTHER CHARGES THAT:

From on or about May 15, 2007 to on or about February 1, 2008, in the Eastern District of Pennsylvania and elsewhere, defendant

**LAWRENCE FUDGE,
a/k/a "Larry Fudge"**

knowingly and without lawful authority, transferred and used, and aided and abetted the use of, a means of identification of another person, that is, the use of the name and personal identifying information of the persons indicated below, each person constituting a separate count, during and in relation to bank fraud.

<u>COUNT</u>	<u>DATE</u>	<u>VICTIM</u>
27	5/15/07	T.P.
28	5/22/07	K.H.
29	6/21/07	W.S.
30	7/21/07	C.C.
31	7/31/07	D.W.
32	5/30/07	C.J.
33	02/01/08	K.L.

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

and 2.

NOTICE OF FORFEITURE

1. As a result of the violations of Title 18, United States Code, Sections 1344 and 1029, set forth in this indictment, defendants

**LAWRENCE FUDGE,
a/k/a "Larry Fudge,"
SHAWN ROBINSON,
and
RICHARD WILLIAMS**

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 indictment, including, but not limited to, the sum of \$143,665.

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