

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

UNITED STATES OF AMERICA	:	CRIMINAL NO. <u>10-212</u>
v.	:	DATE FILED: <u>September 1, 2011</u>
HAJAR MUHAMMAD	:	VIOLATIONS:
JOSEPH MIDDLETON	:	
KAREEM COMPTON	:	18 U.S.C. § 371 (conspiracy - 1 count)
CHARLENE MARTIN HOLLIMAN,	:	18 U.S.C. § 1344 (bank fraud - 3 counts)
a/k/a "Sugarpooh"	:	18 U.S.C. § 1028A (aggravated identity
HAROLD GOODMAN,		theft - 11 counts)
a/k/a "J,"		18 U.S.C. § 2 (aiding and abetting)
a/k/a "Bamboo"		Notice of forfeiture
VINCENT WILLIAMS,		
a/k/a "Umar"		
NATASHA GILLIAM,		
a/k/a "Tasha"		
HARMON FORD,		
DOMINIQUE HAYES,		
JAMAL HAMMOND,		
a/k/a "J,"		
DWAYNE WILSON,		
a/k/a "Chris,"		
a/k/a "Weezie"		

SECOND SUPERSEDING INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

At all times material to this second 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.

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

MANNER AND MEANS

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.

**HAJAR MUHAMMAD,
 JOSEPH MIDDLETON,
 KAREEM COMPTON,
 CHARLENE MARTIN HOLLIMAN,
 a/k/a "Sugarpooh,"
 HAROLD GOODMAN,
 a/k/a "J,"
 a/k/a "Bamboob,"
 VINCENT WILLIAMS,
 a/k/a "Umar,"
 NATASHA GILLIAM,
 a/k/a "Tasha,"
 DOMINIQUE HAYES,
 HARMON FORD,
 JAMAL HAMMOND,
 a/k/a "J," and
 DWAYNE WILSON,
 a/k/a "Chris,"
 a/k/a "Weezie"**

3. From on or about October 5, 2009 to on or about January 18, 2010, in the Eastern District of Pennsylvania and the District of New Jersey, defendants

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. Defendants KAREEM COMPTON, JAMAL HAMMOND and DWAYNE WILSON 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 bank account information and checks for other TD Bank accounts 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, HARMON FORD and DOMINIQUE HAYES, to Ava Martin, Khouri McKenzie, Dionna Hayes, Denise Hayes, Derricka Hayes, Tiana Alexander, Raetiana Williams, Alesha Williams, Lakera Steward, Gerald Bell, Donald Flowers, Troy Robinson, and Anthony Myers, all charged elsewhere, and to other individuals known to the grand jury, including M.M., E.T., A.H., M.W., R.F., D.Hu., J.S., D.S. and N.P., 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, HARMON FORD, and DOMINIQUE HAYES, as well as Ava Martin, Khouri McKenzie, Dionna Hayes, Denise Hayes, Derricka Hayes, Tiana Alexander, Raetiana Williams, Alesha Williams, Lakera Steward, Gerald Bell, Donald Flowers, Troy Robinson, Anthony Myers, M.M., A.H., M.W., R.F., D.Hu., D.S., N.P., J.S., E.T., L.M., E.P., W.L., and T.B., and other check-runners cashed or deposited counterfeit checks at TD Bank branches, totaling more than approximately \$249,000.

OVERT ACTS

In furtherance of the conspiracy, defendants HAJAR MUHAMMAD, JOSEPH MIDDLETON, KAREEM COMPTON, CHARLENE MARTIN HOLLIMAN, HAROLD GOODMAN, VINCENT WILLIAMS, NATASHA GILLIAM, HARMON FORD, DOMINIQUE HAYES, JAMAL HAMMOND and DWAYNE WILSON, 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 January 18, 2010, defendants KAREEM COMPTON, CHARLENE MARTIN HOLLIMAN, HAROLD GOODMAN, VINCENT WILLIAMS, JAMAL HAMMOND and DWAYNE WILSON, 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 defendants JOSEPH MIDDLETON and DOMINIQUE HAYES, as well as Ava Martin, Khouri McKenzie, Dionna Hayes, Denise Hayes, Derricka Hayes, Tiana Alexander, Raetiana Williams, Alesha Williams, Lakera Steward, Gerald Bell, Donald Flowers, Troy Robinson, Anthony Myers, M.M., A.H., M.W., R.F., D.Hu., D.S., N.P., J.S., E.T., L.M., E.P., W.L., and T.B., 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 January 18, 2010, in the Eastern District of Pennsylvania and the District of New Jersey, defendants

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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, HARMON FORD, DOMINIQUE HAYES, JAMAL HAMMOND and DWAYNE WILSON, 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, including Gerald Bell, Donald Flowers, M. W., R.F. D.Hu., D.S. and N.P., 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, HAROLD GOODMAN, JAMAL HAMMOND, DWAYNE WILSON, 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, JAMAL HAMMOND, DWAYNE WILSON, 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	\$1629
10/14/09	Willow Ridge, NJ	R.H.	14677	\$1645
10/14/09	Mt. Laurel, NJ	J.L.	14678	\$1755
10/15/09	Mt. Laurel, NJ	Tiana Alexander	14703	\$1790
10/15/09	Marlton, NJ	S.W.	14704	\$1650
10/15/09	Willow Ridge, NJ	Natasha Gilliam	14702	\$1695
10/15/09	Marlton, NJ	Ava Martin	14699	\$1751
10/15/09	King of Prussia, PA	N.L.	14679	\$1825
10/15/09	Collegeville, PA	L.A.	14689	\$1700
10/15/09	Royersford, PA	J.A.	14690	\$1680
10/15/09	Cherry Hill, NJ	N.B.	14701	\$1750
10/15/09	Cherry Hill, NJ	R.H.	14700	\$1725
10/16/09	Center City, Philadelphia, PA	D.He.	14695	\$1992
10/16/09	Rittenhouse, Philadelphia, PA	J.W.	14696	\$1966
10/16/09	University City, Philadelphia, PA	D.N.	14697	\$1987
10/16/09	Jefferson Hospital, Philadelphia, PA	S.E.	14698	\$1988
10/19/09	Center City, Philadelphia, PA	S.E.	14705	\$2000
10/19/09	Jefferson Hospital, Philadelphia, PA	D.Hu.	14706	\$2000

<u>DATE</u>	<u>LOCATION</u>	<u>CHECK CASHER</u>	<u>CHECK NO.</u>	<u>AMOUNT</u>
10/19/09	Broad & Sansom, Philadelphia, PA	S.E.	14701	\$1956

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	\$1931 attempt
10/21/09	University City, Philadelphia, PA	M.B.	112	\$1942
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
10/22/09	Philadelphia, PA	Anthony Myers	16535	\$9100 deposited and withdrawn
10/22/09	Bensalem, PA	T.M.	16534	\$2100
10/22/09	Feasterville, PA	Ava Martin	11533	\$2100
10/22/09	Langhorne, PA	J.D.	16528	\$2100
10/22/09	Bensalem, PA	K.G.	11532	\$2100
10/22/09	Morrisville, PA	N.B.	11531	\$2100

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	\$1590

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 signed by C.B., an authorized signer for that account, and, on or about October 25, 2009, defendant HAJAR MUHAMMAD photocopied that check.

17. In furtherance of the scheme, at the direction of defendants JAMAL HAMMOND and DWAYNE WILSON and others known and unknown to the grand jury, Troy Robinson and D.Hu. 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, and with the purported signature of C.B., an authorized signer for 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	\$2400
10/27/09	Cherry Hill, NJ	D.Hu.	1160	\$2400

18. In furtherance of the scheme, at the direction of defendants JAMAL HAMMOND and DWAYNE WILSON and others known and unknown to the grand jury, Troy Robinson and D.Hu., and others known to the grand jury, were transported to TD Bank branches in Philadelphia, Pennsylvania to cash the following counterfeit checks, made payable to them, drawn on the TD Bank account of Premiere Sports LLC and with the purported signature of M.S., an authorized signer for Premiere Sports LLC. The transactions were as follows:

<u>DATE</u>	<u>LOCATION</u>	<u>CHECK CASHER</u>	<u>CHECK NO.</u>	<u>AMOUNT</u>
10/26/09	Philadelphia, PA	D.Hu.	13633	\$1900
10/26/09	Philadelphia, PA	Troy Robinson	13635	\$1900

19. 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 signed by M.G., an authorized signer for that account, and then made a photocopy of that check.

20. In furtherance of the scheme, at the direction of others known and unknown to the grand jury, defendant JOSEPH MIDDLETON and other check runners, including Gerald Bell, Donald Flowers, D.S., R.F., M.W., and T.B., 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 and with the purported signature of M.G., an authorized signer for 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	\$2400
11/02/09	Philadelphia, PA	T.B	1113	\$2400
11/02/09	Philadelphia, PA	Gerald Bell	1116	\$2400
11/02/09	Philadelphia, PA	Donald Flowers	1127	\$2400

<u>DATE</u>	<u>LOCATION</u>	<u>CHECK CASHER</u>	<u>CHECK NO.</u>	<u>AMOUNT</u>
11/02/09	Philadelphia, PA	Donald Flowers	1118	\$2400
11/02/09	Philadelphia, PA	Donald Flowers	1132	\$2400
11/02/09	Philadelphia, PA	T.B.	1131	\$2400
11/02/09	Philadelphia, PA	R.F.	1117	\$2400
11/03/09	Philadelphia, PA	Donald Flowers	1155	\$2400
11/03/09	Philadelphia, PA	M.W.	1152	\$2400
11/03/09	Royersford, PA	Joseph Middleton	1140	\$2400
11/03/09	Collegeville, PA	Joseph Middleton	1133	\$2400
11/04/09	Philadelphia, PA	R.F.	1153	\$2400
11/04/09	Philadelphia, PA	Donald Flowers	1159	\$2400
11/08/09	Philadelphia, PA	Gerald Bell	98237	\$2400 attempt

21. 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	\$2100
10/27/09	Langhorne, PA	Ashley Wells	6797	\$2100 attempt

22. In furtherance of the scheme, at the direction of defendants JAMAL HAMMOND and DWAYNE WILSON and others unknown to the grand jury, Troy Robinson and others 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 Shadowbox Pictures. The transaction of Troy Robinson was follows:

<u>DATE</u>	<u>LOCATION</u>	<u>CHECK CASHER</u>	<u>CHECK NO.</u>	<u>AMOUNT</u>
10/28/09	Philadelphia, PA	Troy Robinson	6671	\$2400

23. In furtherance of the scheme, at the direction of defendants JAMAL HAMMOND and DWAYNE WILSON and others unknown to the grand jury, Donald Flowers and R.F. were transported to TD Bank branches in Philadelphia, Pennsylvania to cash the following counterfeit checks, made payable to them, drawn on the personal TD Bank account of P.R. The transactions were as follows:

<u>DATE</u>	<u>LOCATION</u>	<u>CHECK CASHER</u>	<u>CHECK NO.</u>	<u>AMOUNT</u>
10/29/09	Philadelphia, PA	R.F.	1776	\$2000

<u>DATE</u>	<u>LOCATION</u>	<u>CHECK CASHER</u>	<u>CHECK NO.</u>	<u>AMOUNT</u>
10/28/09	Philadelphia, PA	Donald Flowers	1771	\$1994

24. 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.

25. In furtherance of the scheme, defendant JOSEPH MIDDLETON and approximately four other check runners, including D.S. and N.P., 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	\$2400
11/05/09	Philadelphia, PA	D.S.	3351	\$2400
11/05/09	Philadelphia, PA	N.P.	3347	\$2400
11/06/09	Plainview, NY	D.S.	3390	\$2400 attempt
11/06/09	Marlton, NJ	Joseph Middleton	3379	\$2400 attempt

26. 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.

27. 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	\$1600
11/06/09	Ganttown, NJ	Khouri McKenzie	2824	\$1732
11/06/09	Cross Keys, NJ	Derricka Hayes	2825	\$1721 attempt
11/06/09	Pennsauken, NJ	Lakera Steward	2829	\$1721
11/06/09	Holmes, PA	Raetiana Williams	2793	\$994
11/06/09	Holmes, PA	Alesha Williams	2791	\$989

28. In furtherance of the scheme, at the direction of defendants KAREEM COMPTON, CHARLENE MARTIN HOLLIMAN and HAROLD GOODMAN, defendant DOMINIQUE HAYES and Khouri McKenzie, Derricka 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	\$100
11/06/09	Ganttown, NJ	Khouri McKenzie	3595	\$1800
11/08/09	Ganttown, NJ	Derricka Hayes	3596	\$1800
11/08/09	Sicklerville, NJ	Dominique Hayes	3597	\$1800
11/09/09	Voorhees, NJ	Lakera Steward	3610	\$2162
11/09/09	Willow Ridge, NJ	P.B.	3611	\$2139

29. 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.

30. 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	\$2382
11/25/09	Horsham, PA	T.R.	2431	\$2346
11/25/09	S. Doylestown, PA	M.R.	2436	\$2356
11/27/09	Horsham, PA	Ava Martin	2433	\$2321

31. 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.

32. In furtherance of the scheme, at the direction of defendants JAMAL HAMMOND and DWAYNE WILSON and others unknown to the grand jury, check runner L.M. was transported to a TD Bank branch in New Jersey to cash the following counterfeit check, made payable to him, drawn on the TD Bank account of DNA Ambulance Inc. The transaction was as follows:

<u>DATE</u>	<u>LOCATION</u>	<u>CHECK CASHER</u>	<u>CHECK NO.</u>	<u>AMOUNT</u>
11/25/09	Camden, NJ	L.M.	13183	\$1951

33. In furtherance of the scheme, at the direction of defendants JAMAL HAMMOND and DWAYNE WILSON and others unknown to the grand jury, check runners, including Donald Flowers, Troy Robinson, Gerald Bell, E.P., A.H., L.M., W.L., and M.M., were transported to TD Bank branches in Philadelphia, Pennsylvania and New Jersey to cash the following counterfeit checks, made payable to them, drawn on the TD Bank account of Trimat Inc., and with the purported signature of K.K., an authorized signer for Trimat Inc. The transactions were as follows:

<u>DATE</u>	<u>LOCATION</u>	<u>CHECK CASHER</u>	<u>CHECK NO.</u>	<u>AMOUNT</u>
11/24/09	Philadelphia, PA	Troy Robinson	33562	\$2361
11/24/09	Cherry Hill, NJ	M.M.	33565	\$2362
11/27/09	Cherry Hill, NJ	Donald Flowers	33590	\$1994
11/27/09	Philadelphia, PA	E.P.	33593	\$1963
11/28/09	Cherry Hill, NJ	A.H.	33600	\$1981
11/29/09	Philadelphia, PA	Troy Robinson	33601	\$1946
11/29/09	Philadelphia, PA	A.H.	33610	\$1981
11/29/09	Pennsauken, NJ	L.M.	33608	\$1972
11/29/09	Cherry Hill, NJ	Troy Robinson	33609	\$1935
11/29/09	Cherry Hill, NJ	W.L.	33612	\$1958
11/30/09	Cherry Hill, NJ	W.L.	33598	\$1963

<u>DATE</u>	<u>LOCATION</u>	<u>CHECK CASHER</u>	<u>CHECK NO.</u>	<u>AMOUNT</u>
11/30/09	Cherry Hill, NJ	Donald Flowers	33611	\$1932
11/30/09	Cherry Hill, NJ	Troy Robinson	33591	\$1981

34. 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	\$2382
11/25/09	Horsham, PA	T.R.	2431	\$2346
11/25/09	S. Doylestown, PA	M.R.	2436	\$2356
11/27/09	Horsham, PA	Ava Martin	2433	\$2321

35. In furtherance of the scheme, at the direction of defendants JAMAL HAMMOND and DWAYNE WILSON and others unknown to the grand jury, check runners Gerald Bell and A.H. 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 Markowitz & Richman, and with the purported signature of R.M., an authorized signer for Markowitz & Richman. The transactions were as follows:

<u>DATE</u>	<u>LOCATION</u>	<u>CHECK CASHER</u>	<u>CHECK NO.</u>	<u>AMOUNT</u>
12/01/09	Cherry Hill, NJ	Gerald Bell	24739	\$2321
12/01/09	Cherry Hill, NJ	A.H.	24737	\$2384

36. In furtherance of the scheme, at the direction of defendants JAMAL HAMMOND and DWAYNE WILSON and others unknown to the grand jury, check runner Gerald Bell was transported to a TD Bank branch in Philadelphia, Pennsylvania to cash the following counterfeit check, made payable to him, drawn on the TD Bank account of Margolis, Berman, Bryne Health Psychology, P.C., and with the purported signature of C.M., an authorized signer for Margolis, Berman, Bryne Health Psychology, P.C. The transaction was as follows:

<u>DATE</u>	<u>LOCATION</u>	<u>CHECK CASHER</u>	<u>CHECK NO.</u>	<u>AMOUNT</u>
12/02/09	Philadelphia, PA	Gerald Bell	24739	\$2321

37. In furtherance of the scheme, at the direction of defendants JAMAL HAMMOND and DWAYNE WILSON and others unknown to the grand jury, check runners, including Gerald Bell and J.S., 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 Cescapha Ballroom, and with the purported signature of J.V., an authorized signer for Cescapha Ballroom. The transactions were as follows:

<u>DATE</u>	<u>LOCATION</u>	<u>CHECK CASHER</u>	<u>CHECK NO.</u>	<u>AMOUNT</u>
12/14/09	Cherry Hill, NJ	Gerald Bell	21096	\$2377
12/14/09	Cherry Hill, NJ	Gerald Bell	21101	\$2416
12/14/09	Pennsauken, NJ	J.S.	21100	\$2297

38. In furtherance of the scheme, at the direction of defendants JAMAL HAMMOND and DWAYNE WILSON and others unknown to the grand jury, check runners, including E.T. and J.S., 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 Bill Nocella Autobody Inc. The transactions were as follows:

<u>DATE</u>	<u>LOCATION</u>	<u>CHECK CASHER</u>	<u>CHECK NO.</u>	<u>AMOUNT</u>
12/17/09	Cherry Hill, NJ	E.T.	609	\$1946
12/17/09	Cherry Hill, NJ	J.S.	610	\$1991 attempt

39. In furtherance of the scheme, at the direction of defendants JAMAL HAMMOND and DWAYNE WILSON and others unknown to the grand jury, check runners, including Gerald Bell, J.S. and W.L., 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 Richman Berenbaum & Associates, PC. The transactions were as follows:

<u>DATE</u>	<u>LOCATION</u>	<u>CHECK CASHER</u>	<u>CHECK NO.</u>	<u>AMOUNT</u>
01/17/10	Cherry Hill, NJ	Gerald Bell	32309	\$1967
01/17/10	Pennsauken, NJ	J.S.	32310	\$2030
01/17/10	Pennsauken, NJ	W.L.		\$2168 attempt

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 28 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,"
HAROLD GOODMAN,
a/k/a "J,"
a/k/a "Bamboo," and
DOMINIQUE HAYES**

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., an authorized signer for Stop & Surrender Inc., during and in relation to bank fraud.

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

COUNT SEVEN

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, 16 and 17 of Count Two are realleged here.

2. On or about October 27, 2009, in the Eastern District of Pennsylvania and the District of New Jersey, defendants

**JAMAL HAMMOND,
a/k/a "J,"
and
DWAYNE WILSON
a/k/a "Chris,"
a/k/a "Weezie"**

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 C.B., an authorized signer on the account of Neighbors AWC, during and in relation to bank fraud.

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

COUNT EIGHT

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 23 of Count Two are realleged here.
2. From on or about October 28, 2009 through on or about October 29, 2009, in the Eastern District of Pennsylvania, defendants

**JAMAL HAMMOND,
a/k/a "J,"
and
DWAYNE WILSON
a/k/a "Chris,"
a/k/a "Weezie"**

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 P.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 NINE

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, 19 and 20 of Count Two are realleged here.
2. On or about November 2, 2009, in the Eastern District of Pennsylvania, defendants

**JAMAL HAMMOND,
a/k/a "J,"
and
DWAYNE WILSON
a/k/a "Chris,"
a/k/a "Weezie"**

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 M.G., an authorized signer on the account of Green Silverstein and Groff, during and in relation to bank fraud.

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

COUNT TEN

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 22 of Count Two are realleged here.
2. On or about October 28, 2009, in the Eastern District of Pennsylvania, defendants

**JAMAL HAMMOND,
a/k/a "J,"
and
DWAYNE WILSON
a/k/a "Chris,"
a/k/a "Weezie"**

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 K.B., an authorized signer on the account of Shadowbox Pictures LLC, during and in relation to bank fraud.

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

COUNT ELEVEN

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 33 of Count Two are realleged here.

2. On or about November 24, 2009, in the Eastern District of Pennsylvania and the District of New Jersey, defendants

JAMAL HAMMOND,
a/k/a "J,"
and
DWAYNE WILSON
a/k/a "Chris,"
a/k/a "Weezie"

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 K.K., an authorized signer on the account of Trimat Inc., during and in relation to bank fraud.

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

COUNT TWELVE

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 35 of Count Two are realleged here.
2. On or about December 1, 2009, in the Eastern District of Pennsylvania and the District of New Jersey, defendants

**JAMAL HAMMOND,
a/k/a "J,"
and
DWAYNE WILSON
a/k/a "Chris,"
a/k/a "Weezie"**

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 R.M., an authorized signer on the account of Markowitz & Richman, during and in relation to bank fraud.

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

COUNT THIRTEEN

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 36 of Count Two are realleged here.
2. On or about December 2, 2009, in the Eastern District of Pennsylvania, defendants

**JAMAL HAMMOND,
a/k/a "J,"
and
DWAYNE WILSON
a/k/a "Chris,"
a/k/a "Weezie"**

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 C.M., an authorized signer on the account of Margolis Berman Byrne Health Psychology, P.C., during and in relation to bank fraud.

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

COUNT FOURTEEN

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 37 of Count Two are realleged here.

2. On or about December 14, 2009, in the Eastern District of Pennsylvania and the District of New Jersey, defendants

**JAMAL HAMMOND,
a/k/a "J,"
and
DWAYNE WILSON
a/k/a "Chris,"
a/k/a "Weezie"**

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.V., an authorized signer on the account of Cescapha Ballroom, during and in relation to bank fraud.

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

COUNT FIFTEEN

THE GRAND JURY FURTHER CHARGES THAT:

At all times material to this second superseding indictment:

1. Wachovia Bank was a financial institution, insured by the Federal Deposit Corporation, certificate number 33869.

2. On or about November 20, 2009, in the Eastern District of Pennsylvania, defendants

**JAMAL HAMMOND,
a/k/a "J,"
and
DWAYNE WILSON
a/k/a "Chris,"
a/k/a "Weezie"**

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

THE SCHEME

3. At the direction of defendants JAMAL HAMMOND and DWAYNE WILSON, Troy Robinson and Donald Flowers, charged elsewhere, opened accounts in their names with Wachovia Bank by depositing fraudulent checks, drawn on the account of The Simon Group, a Wachovia Bank customer, into the newly-opened accounts and then making fraudulent withdrawals from those accounts.

4. In furtherance of the scheme, on or about November 20, 2009, at a Wachovia Bank branch in Philadelphia, Pennsylvania, Troy Robinson and Donald Flowers, using Pennsylvania identification cards in their name, opened accounts in their names with Wachovia Bank by depositing into those newly-opened accounts fraudulent checks, totaling approximately \$3,945, that were drawn on the account of The Simon Group and that had been provided to them by defendants JAMAL HAMMOND and DWAYNE WILSON, and then made fraudulent withdrawals in the amount of approximately \$2,862 against those fraudulent checks.

All in violation of Title 18, United States Code, Sections 1344 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,"
HARMON FORD,
DOMINIQUE HAYES,
JAMAL HAMMOND,
a/k/a "J," and
DWAYNE WILSON,
a/k/a "Chris,"
a/k/a "Weezie"**

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 \$200,497.

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