

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

UNITED STATES OF AMERICA : **CRIMINAL NO. 12-**_____

v. : **DATE FILED:**_____

SHANTASHI COOPER : **VIOLATIONS:**
: **18 U.S.C. § 1029(a)(5), (c)(1)(A)(iii) (access**
: **device fraud – 1 count)**
: **18 U.S.C. § 1028A (aggravated identity theft)**
: **18 U.S.C. § 2 (aiding and abetting)**
: **Notice of forfeiture**

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

From at least April 29, 2008, until at least July 5, 2009, in Philadelphia and Montgomery Counties, in the Eastern District of Pennsylvania, defendant

SHANTASHI COOPER

knowingly and with intent to defraud, effected transactions with access devices, that is approximately 47 different credit card accounts, issued to customers of T-Mobile who had provided defendant SHANTASHI COOPER with their credit card numbers while defendant COOPER was a sales associate with T-Mobile, and thereby obtained payment and other things of value exceeding \$1,000 within a one year period, that is, approximately \$8,382.15, thereby affecting interstate commerce.

In violation of Title 18, United States Code, Sections 1029(a)(5) and (c)(1)(A)(iii).

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 18, 2009, in or around Philadelphia, in the Eastern District of Pennsylvania, defendant

SHANTASHI COOPER

knowingly and without lawful authority possessed and used, and aided and abetted the unauthorized possession and use of, a means of identification of another person, that is, the credit card account number of S.W., during and in relation to access device fraud.

In violation of Title 18, United States Code, Sections 1028A(a)(1), (c)(4) and 2.

NOTICE OF FORFEITURE

1. As a result of the violations of Title 18, United States Code, Section 1029(a)(5), set forth in this indictment, defendant

SHANTASHI COOPER

shall forfeit to the United States of America, any property, real or personal, which constitutes or is derived from proceeds traceable to the commission of such offenses, including, but not limited to the sum of \$8,382.15 in United States currency.

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 28, United States Code, Section 2461(c), 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