

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

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

v. : **DATE FILED:**_____

LYNDELL WESTBROOK, : **VIOLATIONS:**

a/k/a “Lyndell Jackson” : **18 U.S.C. § 371 (conspiracy – 1 count)**

: **18 U.S.C. § 471 (counterfeiting – 1 count)**

: **18 U.S.C. § 2 (aiding and abetting)**

: **Notice of forfeiture**

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

1. From in or about September 2011 to on or about November 23, 2011, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**LYNDELL WESTBROOK,
a/k/a “Lyndell Jackson”**

conspired and agreed with Saeed Khan and Jose Perdomo, charged elsewhere, to commit an offense against the United States, that is, to falsely make, forge, counterfeit, and alter obligations and securities of the United States with intent to defraud, in violation of Title 18, United States Code, Section 471, and to pass, utter, publish, and sell falsely made, forged, counterfeited and altered obligations of the United States with intent to defraud, in violation of Title 18, United States Code, Section 472.

MANNER AND MEANS

2. It was part of the conspiracy that defendant LYNDELL WESTBROOK knowingly and intentionally permitted Saeed Khan and Jose Perdomo, charged elsewhere, to

manufacture counterfeit federal reserve notes (“FRNs”) in defendant WESTBROOK’s home.

3. It was part of the conspiracy that within the home of defendant LYNDELL WESTBROOK, Saeed Khan and Jose Perdomo took genuine \$1 and \$5 FRNs, used bleach to remove the ink from the bills, used computer technology to scan and print images of \$50 and \$100 counterfeit FRNs onto the \$1 and \$5 bills, and pressed the bills with a hydraulic press to make them feel like they were genuine.

4. It was further a part of the conspiracy that defendant LYNDELL WESTBROOK and Saeed Khan and Jose Perdomo used the counterfeit currency manufactured by Khan and Perdomo, to purchase goods and services, including taxi rides.

5. It was further a part of the conspiracy that defendant LYNDELL WESTBROOK and Saeed Khan and Jose Perdomo negotiated to sell and did sell the counterfeit currency made by Khan and Perdomo to third parties in exchange for genuine United States currency.

OVERT ACTS

In furtherance of the conspiracy and to accomplish its objects, defendant LYNDELL WESTBROOK and co-conspirators Saeed Khan and Jose Perdomo committed the following overt acts, among others, in the Eastern District of Pennsylvania:

1. From in or around September 2011 until about December 30, 2011, Saeed Khan and Jose Perdomo manufactured counterfeit Federal Reserve Notes.

2. From at least November 17, 2011, until at least November 23, 2011, defendant LYNDELL WESTBROOK permitted co-conspirators Saeed Khan and Jose Perdomo to manufacture counterfeit FRNs within his residence in Philadelphia.

3. On or about November 18, 2011, defendant LYNDELL WESTBROOK and Saeed Khan and Jose Perdomo negotiated to sell approximately \$4,000 worth of counterfeit FRNs to a third party in exchange for approximately \$1,000 in genuine United States currency.

3. On or about November 18, 2011, defendant LYNDELL WESTBROOK and Saeed Khan and Jose Perdomo distributed approximately \$2,150 in counterfeit FRNs to a third party in exchange for approximately \$500 in genuine United States currency.

4. On or about November 23, 2011, defendant LYNDELL WESTBROOK and Saeed Khan and Jose Perdomo distributed approximately \$1,700 in counterfeit FRNs to a third party in exchange for approximately \$500 in genuine United States currency.

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

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

From on or about November 17, 2011, until on or about November 23, 2011, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**LYNDELL WESTBROOK,
a/k/a “Lyndell Jackson”**

with intent to defraud, falsely made, forged, counterfeited, and altered, and aided and abetted the false making, forgery, counterfeiting, and altering of, obligations of the United States, that is, approximately \$3,850 in counterfeit \$50 Federal Reserve Notes.

In violation of Title 18, United States Code, Sections 471 and 2.

NOTICE OF FORFEITURE

1. As a result of the violations of Title 18, United States Code, Sections 371 and 471, set forth in this information, defendant

**LYNDELL WESTBROOK,
a/k/a “Lyndell Jackson”**

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 \$1,000 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**