

FILED
DC SUPERIOR COURT
CRIMINAL INTAKE

SUPERIOR COURT
OF THE
DISTRICT OF COLUMBIA
Holding a Criminal Term
Grand Jury Sworn in on August 5, 2019

2019 SEP 17 PM 12:42

THE UNITED STATES OF AMERICA

: Criminal Nos.

GJO

v.

:

GJO

:

: Violations:

RASHAD LIVERPOOL

: 22 D.C. Code, Sections 933.01(a)(1), 936.01(a)(1);

PDID: --

: 22 D.C. Code, Sections 3211, 3212(a)(1), 3601;

DCTN: U19027617

: 22 D.C. Code, Sections 3227.01, 3227.02(1),

: 3227.03 (a), 3601;

ROBERT TILLERY

: (Financial Exploitation of an Elderly Person,

PDID: --

: First Degree Theft of a Senior Citizen,

DCTN: U19027618

: First Degree Identity Theft of a Senior Citizen)

The Grand Jury charges:

COUNT ONE:

Commencing on or about June 7, 2018, and continuing thereafter to on or about September 5, 2018, within the District of Columbia, Rashad Liverpool intentionally and knowingly used deception and undue influence to obtain the property of [REDACTED] a person of sixty-five years of age or older, with the intent to deprive her of the property and use it for his own advantage. (Financial Exploitation of a Vulnerable Adult or Elderly Person, in violation of 22 D.C. Code, Sections 933.01(a)(1), 936.01(a)(1) (2001 ed.)).

COUNTS TWO THROUGH SEVEN:

On or about each of the following dates, within the District of Columbia, Rashad Liverpool wrongfully obtained and used property of a value of \$1,000 or more, belonging to [REDACTED] a person sixty-five years of age or older, consisting of U.S. currency, with the intent to appropriate the property for his own use and to deprive her of a right to and benefit of the property.

<u>Count</u>	<u>Date</u>	<u>Approximate Amount</u>
Two	June 8, 2018	\$20,000
Three	July 9, 2018	\$8,000
Four	August 8, 2018	\$15,000
Five	August 22, 2018	\$2,200
Six	August 31, 2018	\$4,700
Seven	September 5, 2018	\$2,000

(First Degree Theft of a Senior Citizen, in violation of 22 D.C. Code, Sections 3211, 3212(a), 3601 (2001 ed.))

COUNTS EIGHT THROUGH THIRTEEN:

On or about each of the following dates, within the District of Columbia, Rashad Liverpool knowingly used the personal identifying information of [REDACTED] a person sixty-five years of age or older, that is, her name and financial account numbers, without her consent, to fraudulently obtain, and attempt to obtain, property of a value of \$1,000 or more, that is, U.S. currency.

<u>Count</u>	<u>Date</u>	<u>Approximate Amount</u>
Eight	June 8, 2018	\$20,000
Nine	July 9, 2018	\$8,000
Ten	August 8, 2018	\$15,000
Eleven	August 22, 2018	\$2,200
Twelve	August 31, 2018	\$4,700
Thirteen	September 5, 2018	\$2,000

(First Degree Identity Theft of a Senior Citizen, in violation of 22 D.C. Code, Sections 3227.02(1), 3227.03(a), 3601 (2001 ed.))

COUNT FOURTEEN:

Commencing on or about June 7, 2018, and continuing thereafter to on or about August 2, 2018, within the District of Columbia, Robert Tillery intentionally and knowingly used deception and undue influence to obtain the property of [REDACTED] a person of sixty-five years of age or older, with the intent to deprive her of the property and use it for his own advantage. (Financial Exploitation of a Vulnerable Adult or Elderly Person, in violation of 22 D.C. Code, Sections 933.01(a)(1), 936.01(a)(1) (2001 ed.)).

COUNTS FIFTEEN AND SIXTEEN:

On or about each of the following dates, within the District of Columbia, Robert Tillery wrongfully obtained and used property of a value of \$1,000 or more, belonging to [REDACTED] a person sixty-five years of age or older, consisting of U.S. currency, with the intent to appropriate the property for his own use and to deprive her of a right to and benefit of the property.

<u>Count</u>	<u>Date</u>	<u>Approximate Amount</u>
Fifteen	July 27, 2018	\$3,000
Sixteen	August 2, 2018	\$25,700

(First Degree Theft of a Senior Citizen, in violation of 22 D.C. Code, Sections 3211, 3212(a), 3601 (2001 ed.))

COUNTS SEVENTEEN AND EIGHTEEN:

On or about each of the following dates, within the District of Columbia, Robert Tillery knowingly used the personal identifying information of [REDACTED] a person sixty-five years of age or older, that is, her name and financial account numbers, without her consent, to fraudulently obtain, and attempt to obtain, property of a value of \$1,000 or more, that is, U.S. currency.

Count	Date	Approximate Amount
Seventeen	July 27, 2018	\$3,000
Eighteen	August 2, 2018	\$25,700

(First Degree Identity Theft of a Senior Citizen, in violation of 22 D.C. Code, Sections 3227.01, 3227.02(1), 3227.03(a), 3601 (2001 ed.))



JESSIE K. LIU
United States Attorney
in and for the District of Columbia

A TRUE BILL:



Foreperson