

FEB 23 2021

JUDGE LEE

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

DAVEY HINES,
 also known as "Lil Dave,"
BILLYE HARRIS,
TERRANCE SCALES,
 also known as "T-Mac,"
 also known as "Meezy,"
STEPHON JOHNSON,
 also known as "Steph,"
 also known as "Stuff,"
LOREAL ROSS,
REBECCA OKUNOREN,
 also known as "Yemi,"
JESSICA JEFFERSON,
MONIQUE D. LOVE,
MYIEASHA WEAVER,
 also known as "Kimora,"
BRITTNAY P. SHEPARD, and
DOMINIQUE SYKES

No.

MAGISTRATE JUDGE MCSHAIN

Violations: Title 18, United States
Code, Sections 371, 1029(a)(2),
1029(b)(1), and 1708

21 CR 129

COUNT ONE

The SPECIAL NOVEMBER 2019 GRAND JURY charges:

1. At times material to this indictment:
 - a. Snapchat was a messaging application for mobile phones that allowed users to send and receive "self-destructing" messages, pictures, and videos.
 - b. Defendants REBECCA OKUNOREN, JESSICA JEFFERSON, MONIQUE D. LOVE, MYIEASHA WEAVER, BRITTNAY P. SHEPARD, and DOMINIQUE SYKES were employed by the United States Postal Service ("USPS") to deliver mail in the Chicago area.

2. From in or around June 2018, and continuing through in or around December 2019, in the Northern District of Illinois, Eastern Division, and elsewhere,

DAVEY HINES,
also known as "Lil Dave,"
BILLYE HARRIS,
TERRANCE SCALES,
also known as "T-Mac,"
also known as "Meezy,"
STEPHON JOHNSON,
also known as "Steph,"
also known as "Stuff,"
LOREAL ROSS,
REBECCA OKUNOREN,
also known as "Yemi,"
JESSICA JEFFERSON,
MONIQUE D. LOVE,
MYIEASHA WEAVER,
also known as "Kimora,"
BRITTNAY P. SHEPARD, and
DOMINIQUE SYKES,

defendants herein, conspired with each other and with others known and unknown to the Grand Jury to commit an offense against the United States, namely, to steal mail, in violation of Title 18, United States Code, Section 1708, and to traffic in or use, with intent to defraud, one or more unauthorized access devices, namely credit cards, during any-one year period, and by such conduct obtain anything of value aggregating \$1,000 or more during that period, thereby affecting interstate commerce, in violation of Title 18, United States Code, Section 1029(a)(2).

3. It was part of the conspiracy that defendants DAVEY HINES, BILLYE HARRIS, and TERRANCE SCALES recruited USPS employees to steal mail containing credit cards and other financial instruments.

4. It was further part of the conspiracy that defendants REBECCA OKUNOREN, JESSICA JEFFERSON, MONIQUE D. LOVE, MYIEASHA WEAVER, BRITTNAY P. SHEPARD, and DOMINIQUE SYKES stole U.S. mail containing credit cards and other financial instruments.

5. It was further part of the conspiracy that defendants REBECCA OKUNOREN, JESSICA JEFFERSON, MONIQUE D. LOVE, MYIEASHA WEAVER, BRITTNAY P. SHEPARD, and DOMINIQUE SYKES provided the stolen U.S. mail to defendants DAVEY HINES, BILLYE HARRIS, and TERRANCE SCALES, in exchange for cash and other items of value.

6. It was further part of the conspiracy that defendants STEPHON JOHNSON and LOREAL ROSS unlawfully obtained USPS customer personal identifying information, including USPS customer names, dates of birth, social security numbers, heights, weights, and addresses.

7. It was further part of the conspiracy that defendants DAVEY HINES, BILLYE HARRIS, TERRANCE SCALES, STEPHON JOHNSON, and LOREAL ROSS used USPS customer personal identifying information to fraudulently activate and use the stolen credit cards and other financial instruments.

8. It was further part of the conspiracy that DAVEY HINES, BILLYE HARRIS, TERRANCE SCALES, STEPHON JOHNSON, and LOREAL ROSS, and others known and unknown to the Grand Jury, used the stolen credit cards and other financial instruments to make and attempt to make fraudulent purchases without authorization.

Overt Acts

9. In furtherance of and to effect the objects of the conspiracy, defendants DAVEY HINES, BILLYE HARRIS, TERRANCE SCALES, STEPHON JOHNSON, LOREAL ROSS, REBECCA OKUNOREN, JESSICA JEFFERSON, MONIQUE D. LOVE, MYIEASHA WEAVER, BRITTNAY P. SHEPARD, and DOMINIQUE SYKES committed and caused to be committed the following overt acts, among others, in the Northern District of Illinois:

a. On or about June 8, 2018, defendant DAVEY HINES and defendant REBECCA OKUNOREN exchanged messages on their cellular phones concerning the theft of U.S. mail containing financial instruments, including a debit card and a Capital One credit card.

b. On or about August 17, 2019, while at her USPS vehicle, defendant REBECCA OKUNOREN stole U.S. mail by placing it in her pants.

c. On or about October 2, 2019, defendant DAVEY HINES sent messages to defendant STEPHON JOHNSON's Snapchat account containing images of mail addressed to Victim VS, Victim AD, and Victim AP-2.

d. On or about October 2, 2019, defendant LOREAL ROSS sent messages to defendant DAVEY HINES' Snapchat account containing images of mail addressed to Victim VS, Victim AD, and Victim AP-2.

e. On or about October 2, 2019, defendant STEPHON JOHNSON sent messages to defendant DAVEY HINES' cellular phone containing personal identifying information for Victim VS and Victim AD.

f. On or about October 2, 2019, defendant DAVEY HINES sent messages to defendant LOREAL ROSS's cellular phone containing personal identifying information for Victim AP-2 and Victim VS.

g. On or about October 2, 2019, defendant LOREAL ROSS attempted to use Victim VS's credit card at a Best Buy store to make approximately \$1,440 in fraudulent purchases.

h. On or about October 2, 2019, defendant LOREAL ROSS used Victim AD's credit card at a Best Buy store to make approximately \$1,532 in fraudulent purchases.

i. On or about October 2, 2019, defendant LOREAL ROSS attempted to use Victim VS's credit card at Fry's Electronics store to make approximately \$1,585 in fraudulent purchases.

j. On or about September 13, 2019, defendant JESSICA JEFFERSON stole U.S. mail from her assigned mail delivery route and provided it to defendant DAVEY HINES.

k. On or about September 30, 2019, defendant JESSICA JEFFERSON sent messages to defendant DAVEY HINES' cellular phone concerning the theft of U.S. mail containing Victim KN-2's Bank of America credit card.

l. On or about September 30, 2019, defendant LOREAL ROSS sent a message to defendant DAVEY HINES' Snapchat account containing personal identifying information for Victim KN-2.

m. On or about November 1, 2018, defendant MONIQUE D. LOVE stole two pieces of U.S. mail, addressed to Victim NVN and Victim CS, from her assigned mail delivery route.

n. On or about July 17, 2018, defendant MYIESHA WEAVER sent a message to defendant DAVEY HINES' Snapchat account containing a picture of mail addressed to Victim MS from Synchrony Bank.

o. On or about August 28, 2018, defendant DAVEY HINES sent messages to defendant MYEISHA WEAVER's cellular phone containing personal identifying information for eight USPS customers.

p. On or about May 10, 2019, defendant BRITTNAY P. SHEPARD stole a piece of U.S. mail, addressed to Victim MC from Chase Bank, from her assigned mail delivery route.

q. On or about May 11, 2019, defendant STEPHON JOHNSON sent a message to defendant DAVEY HINES' Snapchat account containing personal identifying information for Victim MC.

r. On or about May 12, 2019, defendant DAVEY HINES attempted to use Victim MC's credit card at a Walmart to make approximately \$332 in fraudulent purchases.

s. On or about June 24, 2019, defendant DOMINQUE SYKES stole U.S. mail and placed it into her personal bag.

t. On or about August 2, 2019, defendant BILLYE HARRIS sent a message to defendant DAVEY HINES' cellular phone containing an image of mail

inserts addressed to Victim GA, Victim MA, Victim CR, Victim JA, Victim JT, and Victim GH.

u. On or about August 3, 2019, defendant STEPHON JOHNSON sent messages to defendant DAVEY HINES' cellular phone containing personal identifying information for Victim CR, Victim GH, Victim JT, and Victim GA.

v. On or about August 3, 2019, defendant DAVEY HINES and defendant BILLYE HARRIS used Victim GA's credit card at a Meijer store to make approximately \$509 in fraudulent purchases.

w. On or about August 3, 2019, defendant DAVEY HINES and defendant LOREAL ROSS attempted to use Victim GH's credit card at a Meijer store to make approximately \$474 in fraudulent purchases.

x. On or about August 3, 2019, defendant DAVEY HINES and defendant LOREAL ROSS used Victim GA's credit card at a Meijer store to make approximately \$474 in fraudulent purchases.

10. It was further part of the conspiracy that defendants DAVEY HINES, BILLYE HARRIS, TERRANCE SCALES, STEPHON JOHNSON, LOREAL ROSS, REBECCA OKUNOREN, JESSICA JEFFERSON, MONIQUE D. LOVE, MYIEASHA WEAVER, BRITTNAY P. SHEPARD, and DOMINIQUE SYKES concealed and hid, and caused to be concealed and hidden, the purposes of the acts done in furtherance of the conspiracy.

In violation of Title 18, United States Code, Section 371.

COUNT TWO

The SPECIAL NOVEMBER 2019 GRAND JURY further charges:

On or about July 1, 2018, in the Northern District of Illinois, Eastern Division,
and elsewhere,

TERRANCE SCALES,
also known as "T-Mac,"
also known as "Meezy,"

defendant herein, did knowingly receive and possess mail, that previously had been
stolen from a mail route, and that defendant knew previously had been stolen, namely
one piece of mail addressed to Victim LS;

In violation of Title 18, United States Code, Section 1708.

COUNT THREE

The SPECIAL NOVEMBER 2019 GRAND JURY further charges:

On or about July 17, 2018, in the Northern District of Illinois, Eastern Division,
and elsewhere,

MYIEASHA WEAVER,
also known as "Kimora,"

defendant herein, did knowingly receive and possess mail, that previously had been
stolen from a mail route, and that defendant knew previously had been stolen, namely
one piece of mail addressed to Victim MS;

In violation of Title 18, United States Code, Section 1708.

COUNT FOUR

The SPECIAL NOVEMBER 2019 GRAND JURY further charges:

On or about November 1, 2018, in the Northern District of Illinois, Eastern Division, and elsewhere,

MONIQUE D. LOVE,

defendant herein, did knowingly steal and take from and out of the mail, a letter, package and mail, namely two pieces of mail addressed to Victim NVN and Victim CS;

In violation of Title 18, United States Code, Section 1708.

COUNT FIVE

The SPECIAL NOVEMBER 2019 GRAND JURY further charges:

On or about May 10, 2019, in the Northern District of Illinois, Eastern Division, and elsewhere,

BRITTNAY D. SHEPARD,

defendant herein, did knowingly steal and take from and out of the mail, a letter, package and mail, namely one piece of mail addressed to Victim MC;

In violation of Title 18, United States Code, Section 1708.

COUNT SIX

The SPECIAL NOVEMBER 2019 GRAND JURY further charges:

On or about August 2, 2019, in the Northern District of Illinois, Eastern Division, and elsewhere,

DOMINQUE SYKES,

defendant herein, did knowingly steal and take from and out of the mail, a letter, package and mail, namely six pieces of mail addressed to Victim GA, Victim MA, Victim CR, Victim JA, Victim JT, and Victim GH;

In violation of Title 18, United States Code, Section 1708.

COUNT SEVEN

The SPECIAL NOVEMBER 2019 GRAND JURY further charges:

On or about August 2, 2019, in the Northern District of Illinois, Eastern Division, and elsewhere,

DAVEY HINES,
also known as "Lil Dave," and
BILLYE HARRIS,

defendants herein, did knowingly receive and possess mail, that previously had been stolen from a mail route, and that defendants knew previously had been stolen, namely two pieces of mail addressed to Victim GA and Victim GH.

In violation of Title 18, United States Code, Sections 1708 and 2.

COUNT EIGHT

The SPECIAL NOVEMBER 2019 GRAND JURY further charges:

On or about September 22, 2019, in the Northern District of Illinois, Eastern Division, and elsewhere,

STEPHON JOHNSON,
also known as "Steph,"
also known as "Stuff,"

defendant herein, did knowingly receive and possess mail, that previously had been stolen from a mail route, and that defendant knew previously had been stolen, namely one piece of mail addressed to Victim AA;

In violation of Title 18, United States Code, Section 1708.

COUNT NINE

The SPECIAL NOVEMBER 2019 GRAND JURY further charges:

On or about September 30, 2019, in the Northern District of Illinois, Eastern Division, and elsewhere,

JESSICA JEFFERSON,

defendant herein, did knowingly steal and take from and out of the mail, a letter, package and mail, namely one piece of mail addressed to Victim KN-2;

In violation of Title 18, United States Code, Section 1708.

COUNT TEN

The SPECIAL NOVEMBER 2019 GRAND JURY further charges:

On or about September 30, 2019, in the Northern District of Illinois, Eastern Division, and elsewhere,

REBECCA OKUNOREN,
also known as "Yemi,"

defendant herein, did knowingly steal and take from and out of the mail, a letter, package and mail, namely three pieces of mail addressed to Victim VS, Victim AD, and Victim AP-2;

In violation of Title 18, United States Code, Section 1708.

COUNT ELEVEN

The SPECIAL NOVEMBER 2019 GRAND JURY further charges:

On or about October 2, 2019, in the Northern District of Illinois, Eastern Division, and elsewhere,

LOREAL ROSS,

defendant herein, did knowingly receive and possess mail, that previously had been stolen from a mail route, and that defendant knew previously had been stolen, namely two pieces of mail addressed to Victim VS and Victim AD;

In violation of Title 18, United States Code, Section 1708.

COUNT TWELVE

The SPECIAL NOVEMBER 2019 GRAND JURY further charges:

On or about October 22, 2019, in the Northern District of Illinois, Eastern Division, and elsewhere,

TERRANCE SCALES,
also known as "T-Mac,"
also known as "Meezy,"

defendant herein, did attempt to steal, take, and abstract, and by fraud and deception obtain, from a letter or mail carrier, any letter, package, and mail, namely three pieces of first class mail addressed to Individual KMS, Individual BH, and Individual KB;

In violation of Title 18, United States Code, Section 1708.

COUNT THIRTEEN

The SPECIAL NOVEMBER 2019 GRAND JURY further charges:

On or about August 3, 2019, in the Northern District of Illinois, Eastern Division, and elsewhere,

DAVEY HINES,
also known as "Lil Dave,"
BILLYE HARRIS,
STEPHON JOHNSON,
also known as "Steph,"
also known as "Stuff," and
LOREAL ROSS,

defendants herein, did knowingly and with intent to defraud, attempt to traffic in and use one or more unauthorized access devices, namely, a credit card belonging to Victim GA and a credit card belonging to Victim GH, during any one-year period, and by such conduct obtain anything of value aggregating \$1,000 or more during that period, namely, goods worth approximately \$1,457 at Meijer, thereby affecting interstate commerce;

In violation of Title 18, United States Code, Sections 1029(a)(2), (b)(1), and 2.

COUNT FOURTEEN

The SPECIAL NOVEMBER 2019 GRAND JURY further charges:

On or about August 9, 2019, in the Northern District of Illinois, Eastern Division, and elsewhere,

DAVEY HINES,
also known as "Lil Dave,"
BILLYE HARRIS, and
STEPHON JOHNSON,
also known as "Steph,"
also known as "Stuff,"

defendants herein, did knowingly and with intent to defraud, attempt to traffic in and use one or more unauthorized access devices, namely, a credit card belonging to Victim GH, during any one-year period, and by such conduct obtain anything of value aggregating \$1,000 or more during that period, namely, goods worth approximately \$1,416 at Meijer, thereby affecting interstate commerce;

In violation of Title 18, United States Code, Sections 1029(a)(2), (b)(1), and 2.

COUNT FIFTEEN

The SPECIAL NOVEMBER 2019 GRAND JURY further charges:

On or about August 3, 2019, in the Northern District of Illinois, Eastern Division, and elsewhere,

DAVEY HINES,
also known as "Lil Dave," and
STEPHON JOHNSON,
also known as "Steph,"
also known as "Stuff," and

defendants herein, knowingly transferred, possessed, and used, without lawful authority, a means of identification of another person, namely, the names, dates of birth, and social security account numbers of Victim GH and Victim GA, who were USPS customers, during and in relation to the offense of unauthorized access device fraud, in violation of Title 18, United States Code, Section 1029(b)(1), as described in Counts Thirteen and Fourteen of this Indictment, knowing that the means of identification belonged to another actual person;

In violation of Title 18, United States Code, Section 1028A(a)(1).

COUNT SIXTEEN

The SPECIAL NOVEMBER 2019 GRAND JURY further charges:

On or about August 3, 2019, in the Northern District of Illinois, Eastern Division, and elsewhere,

DAVEY HINES,
also known as "Lil Dave," and
BILLEY HARRIS,

defendants herein, knowingly transferred, possessed, and used, without lawful authority, a means of identification of another person, namely, the names, dates of birth, and social security account numbers of Victim GH and Victim GA, who were USPS customers, during and in relation to the offense of unauthorized access device fraud, in violation of Title 18, United States Code, Section 1029(b)(1), as described in Counts Thirteen and Fourteen of this Indictment, knowing that the means of identification belonged to another actual person;

In violation of Title 18, United States Code, Section 1028A(a)(1).

COUNT SEVENTEEN

The SPECIAL NOVEMBER 2019 GRAND JURY further charges:

On or about October 2, 2019, in the Northern District of Illinois, Eastern Division, and elsewhere,

DAVEY HINES,
also known as "Lil Dave,"
STEPHON JOHNSON,
also known as "Steph,"
also known as "Stuff," and
LOREAL ROSS,

defendants herein, did knowingly and with intent to defraud, attempt to traffic in and use one or more unauthorized access devices, namely, a credit card belonging to Victim VS, during any one-year period, and by such conduct obtain anything of value aggregating \$1,000 or more during that period, namely, goods worth approximately \$1,440 at Best Buy, thereby affecting interstate commerce;

In violation of Title 18, United States Code, Sections 1029(a)(2), (b)(1), and 2.

COUNT EIGHTEEN

The SPECIAL NOVEMBER 2019 GRAND JURY further charges:

On or about October 2, 2019, in the Northern District of Illinois, Eastern Division, and elsewhere,

DAVEY HINES,
also known as "Lil Dave," and
LOREAL ROSS,

defendants herein, knowingly transferred, possessed, and used, without lawful authority, a means of identification of another person, namely, the name, date of birth, and social security account number of Victim VS, who was a USPS customer, during and in relation to the offense of unauthorized access device fraud, in violation of Title 18, United States Code, Section 1029(b)(1), as described in Count Seventeen of this Indictment, knowing that the means of identification belonged to another actual person;

In violation of Title 18, United States Code, Section 1028A(a)(1).

COUNT NINETEEN

The SPECIAL NOVEMBER 2019 GRAND JURY further charges:

On or about October 2, 2019, in the Northern District of Illinois, Eastern Division, and elsewhere,

DAVEY HINES,
also known as "Lil Dave,"
STEPHON JOHNSON,
also known as "Steph,"
also known as "Stuff," and
LOREAL ROSS,

defendants herein, did knowingly and with intent to defraud, traffic in and use one or more unauthorized access devices, namely, a credit card belonging to Victim AD, during any one-year period, and by such conduct obtain anything of value aggregating \$1,000 or more during that period, namely, goods worth approximately \$1,532 at Best Buy, thereby affecting interstate commerce;

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

COUNT TWENTY

The SPECIAL NOVEMBER 2019 GRAND JURY further charges:

On or about October 2, 2019, in the Northern District of Illinois, Eastern Division, and elsewhere,

DAVEY HINES,
also known as "Lil Dave," and
STEPHON JOHNSON,
also known as "Steph,"
also known as "Stuff,"

defendants herein, knowingly transferred, possessed, and used, without lawful authority, a means of identification of another person, namely, the names, dates of birth, and social security account numbers of Victim AD and Victim VS, who were USPS customers, during and in relation to the offense of unauthorized access device fraud, in violation of Title 18, United States Code, Sections 1029(a)(2) and 1029(b)(1), as described in Counts Seventeen and Nineteen of this Indictment, knowing that the means of identification belonged to another actual person;

In violation of Title 18, United States Code, Section 1028A(a)(1).

FORFEITURE ALLEGATION

The SPECIAL NOVEMBER 2019 GRAND JURY further alleges:

1. Upon conviction of an offense in violation of Title 18, United States Code, Sections 1029(a)(2) and 1029(b)(1), as set forth in this Indictment, defendants DAVEY HINES, BILLYE HARRIS, STEPHON JOHNSON, and LOREAL ROSS shall forfeit to the United States of America:

a. any property constituting and derived from proceeds obtained directly and indirectly as a result of the offense, as provided in Title 18, United States Code, Section 982(a)(2)(B); and

b. any personal property used and intended to be used to commit the offense, as provided in Title 18, United States Code, Section 1029(c)(1)(C).

2. If any of the property described above, as a result of any act or omission by a defendant: cannot be located upon the exercise of due diligence; has been transferred or sold to, or deposited with, a third party; has been placed beyond the jurisdiction of the Court; has been substantially diminished in value; or has been commingled with other property which cannot be divided without difficulty, the United States of America shall be entitled to forfeiture of substitute property, as provided in Title 21, United States Code Section 853(p).

A TRUE BILL:

FOREPERSON

Signed by Matthew Madden on behalf of the
UNITED STATES ATTORNEY