

**FILED**  
9/23/2021

**JMK**

THOMAS G. BRUTON  
CLERK, U.S. DISTRICT COURT

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

WILLIAM CRAWFORD,  
also known as "will\_bill1,"  
BRANDY WALKER,  
also known as "bambiblue88," and  
ZAKEYA BLAKE,  
also known as "liddlecakess"

No. **1:21-CR-00603**

Violations: Title 18, United States  
Code, Sections 371 and 1708

**JUDGE SHAH**  
**MAGISTRATE JUDGE CUMMINGS**

COUNT ONE

The SPECIAL JULY 2021 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 BRANDY WALKER and ZAKEYA BLAKE were employed by the United States Postal Service ("USPS").

c. As a part of their USPS employment, defendants BRANDY WALKER and ZAKEYA BLAKE were responsible for delivering mail in Chicago.

2. From in or around January 2018, and continuing through in or around February 2020, in the Northern District of Illinois, Eastern Division, and elsewhere,

WILLIAM CRAWFORD,  
also known as "will\_bill1,"  
BRANDY WALKER,  
also known as "bambiblue88," and  
ZAKEYA BLAKE,  
also known as "liddlecakess,"

defendants herein, conspired with each other, with Co-conspirator A, 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 possess, with intent to defraud, 15 or more unauthorized access devices, namely credit cards, thereby affecting interstate commerce, in violation of Title 18, United States Code, Section 1029(a)(3).

3. It was part of the conspiracy that defendant WILLIAM CRAWFORD recruited USPS employees to steal mail containing credit cards.

4. It was further part of the conspiracy that defendants BRANDY WALKER and ZAKEYA BLAKE stole U.S. mail containing credit cards in order to provide those items to defendant WILLIAM CRAWFORD and others in exchange for cash.

5. It was further part of the conspiracy that Co-Conspirator A and others unlawfully obtained USPS customer personal identifying information ("PII"), including USPS customer names, dates of birth, and addresses.

6. It was further part of the conspiracy that defendant WILLIAM CRAWFORD and others known and unknown to the Grand Jury used USPS customer PII to fraudulently activate and use the stolen credit cards provided by defendants BRANDY WALKER and ZAKEYA BLAKE.

7. It was further part of the conspiracy that defendant WILLIAM CRAWFORD and others known and unknown to the Grand Jury used the fraudulently obtained credit cards to make purchases without authorization.

### Overt Acts

8. In furtherance of and to effect the objects of the conspiracy, defendants WILLIAM CRAWFORD, BRANDY WALKER, and ZAKEYA BLAKE committed and caused to be committed the following overt acts, among others, in the Northern District of Illinois:

a. From in or around January 2018, and continuing through in or around February 2020, defendants WILLIAM CRAWFORD, BRANDY WALKER, ZAKEYA BLAKE, and others known and unknown to the Grand Jury exchanged messages on their cellular phones concerning the theft of U.S. mail containing credit cards.

b. On or about August 22, 2019, defendant WILLIAM CRAWFORD sent defendant ZAKEYA BLAKE an image via Snapchat showing the names of several USPS customers on one of BLAKE's mail delivery routes.

c. On or about October 3, 2019, defendant WILLIAM CRAWFORD sent Co-Conspirator A an image via Snapchat showing a piece of U.S. mail addressed to Victim BJ and intended for delivery on a route defendant BRANDY WALKER had been assigned on or about September 30, 2019.

d. On or about October 15, 2019, defendant WILLIAM CRAWFORD sent some details of Victim BJ's PII in a text message to Co-Conspirator A. On or about October 17, 2019, a Synchrony Bank credit card in the name of Victim BJ was used to make a more than \$3,400 purchase at a Best Buy in Burbank, Illinois.

e. In or around February 2020, defendant BRANDY WALKER stole a piece of U.S. Mail addressed to Victim AS—that she knew contained a credit card issued by Synchrony Bank—and sold it to defendant WILLIAM CRAWFORD for approximately \$1,000. Between on or about February 11, 2020, and on or about February 16, 2020, Victim AS's Synchrony Bank credit card was used to make more than \$17,000 in fraudulent purchases.

9. It was further part of the conspiracy that defendants WILLIAM CRAWFORD, BRANDY WALKER, and ZAKEYA BLAKE 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 JULY 2021 GRAND JURY further charges:

On or about October 3, 2019, at Chicago, in the Northern District of Illinois,  
Eastern Division,

WILLIAM CRAWFORD,

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 BJ;

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

COUNT THREE

The SPECIAL JULY 2021 GRAND JURY further charges:

On or about October 12, 2019, at Chicago, in the Northern District of Illinois,  
Eastern Division,

ZAKEYA BLAKE,

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 AA;

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

COUNT FOUR

The SPECIAL JULY 2021 GRAND JURY further charges:

On or about October 14, 2019, at Chicago, in the Northern District of Illinois,  
Eastern Division,

WILLIAM CRAWFORD,

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 FIVE

The SPECIAL JULY 2021 GRAND JURY further charges:

On or about February 10, 2020, at Chicago, in the Northern District of Illinois,  
Eastern Division,

BRANDY WALKER,

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 AS;

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

COUNT SIX

The SPECIAL JULY 2021 GRAND JURY further charges:

On or about February 11, 2020, at Chicago, in the Northern District of Illinois,  
Eastern Division,

WILLIAM CRAWFORD,

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 AS;

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

A TRUE BILL:

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FOREPERSON

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Signed by Matthew F. Madden on behalf of the  
UNITED STATES ATTORNEY