


UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION

**FILED**  
U.S. DISTRICT COURT  
MIDDLE DISTRICT OF TENN.  
DEC 19 2018

UNITED STATES OF AMERICA )

v. )

LATOYA CHAMBERS )  
NICOLE C. WALKER )

NO. 3:18-00355   
DEPUTY CLERK

18 U.S.C. § 1349  
18 U.S.C. § 1344  
18 U.S.C. § 1028A  
18 U.S.C. § 2

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES:

At all times relevant to this Indictment:

Introduction

1. Defendant **LATOYA CHAMBERS** was a resident of the State of Tennessee.
2. **LATOYA CHAMBERS** worked as a teller at NGH Credit Union, Albion branch, located in the Middle District of Tennessee.
3. Defendant **NICOLE C. WALKER** was a resident of the State of Tennessee.
4. NGH Credit Union, now known as Cornerstone Financial Credit Union, located in Nashville, Tennessee, was a financial institution within the meaning of Title 18, United States Code, Section 20, and had its deposits insured by the National Credit Union Association (“NCUA”).

The Conspiracy

5. Between in or about March 2018, through in or about June 2018, in the Middle District of Tennessee and elsewhere, **LATOYA CHAMBERS** and **NICOLE C. WALKER** did

unlawfully, knowingly, and willfully conspire, combine, confederate, and agree with each other, to devise a scheme and artifice to defraud financial institutions, and to obtain money and property owned by and under the custody and control of the financial institutions, by means of materially false and fraudulent pretenses, representations, and promises, and by acts of concealment of the scheme, in violation of Title 18, United States Code, Section 1344 (“the scheme to defraud”).

Manner and Means of the Conspiracy

6. It was part of the conspiracy that **LATOYA CHAMBERS**, in her capacity as a teller for NGH Credit Union, accessed NGH Credit Union member names, account numbers, dates of birth, social security numbers, and account balances.

7. It was further part of the conspiracy that **LATOYA CHAMBERS** provided NGH Credit Union members’ names, account numbers, dates of birth, social security numbers, and account balances to **NICOLE C. WALKER**.

8. It was further part of the conspiracy that **NICOLE C. WALKER** went to NGH Credit Union on multiple occasions to make cash withdrawals through **LATOYA CHAMBERS** while **LATOYA CHAMBERS** was working as a teller. **NICOLE C. WALKER** provided **LATOYA CHAMBERS** with a member’s name and account number that she had received from **LATOYA CHAMBERS**, and **LATOYA CHAMBERS** would withdraw funds from the NGH Credit Union customer’s account and give **NICOLE C. WALKER** the money.

9. It was further part of the conspiracy that **NICOLE C. WALKER** and **LATOYA CHAMBERS** would meet after the fraudulent transactions and divide the proceeds of these fraudulent withdrawals.

10. It was further part of the conspiracy that, on occasion, **NICOLE C. WALKER** would dress in costume, including different articles of clothing, a wig, and a surgical mask, to

disguise her appearance while conducting fraudulent transactions at NGH Credit Union.

Overt Acts

11. In furtherance of the conspiracy and to achieve its objects, **LATOYA CHAMBERS** and **NICOLE C. WALKER** committed the following overt acts, among others, in the Middle District of Tennessee and elsewhere:

- a. In or around March 2018, **LATOYA CHAMBERS** provided **NICOLE C. WALKER** with means of identification for NGH Credit Union Member Individual A, including but not limited to Individual A's name and NGH account number.
- b. In or around March 2018, **LATOYA CHAMBERS** provided **NICOLE C. WALKER** with means of identification for NGH Credit Union Member Individual B, including but not limited to Individual B's name and NGH account number.
- c. In or around March 2018, **LATOYA CHAMBERS** provided **NICOLE C. WALKER** with means of identification for NGH Credit Union Member Individual C, including but not limited to Individual C's name and NGH account number.
- d. In or around March 2018, **LATOYA CHAMBERS** provided **NICOLE C. WALKER** with means of identification for NGH Credit Union Member Individual D, including but not limited to Individual D's name and NGH account number.
- e. On March 22, 2018, **NICOLE C. WALKER** went to NGH Credit Union on at least two occasions to make cash withdrawals through **LATOYA CHAMBERS**

while **LATOYA CHAMBERS** was working as a teller. During these transactions, **NICOLE C. WALKER** provided **LATOYA CHAMBERS** the member names and account numbers for Individuals A and B that she had received from **LATOYA CHAMBERS**. **LATOYA CHAMBERS** withdrew funds from the NGH Credit Union customers' accounts and gave **NICOLE C. WALKER** the money.

- f. On March 8, 2018, **NICOLE C. WALKER** went to NGH Credit Union on at least one occasion to make a cash withdrawal through **LATOYA CHAMBERS** while **LATOYA CHAMBERS** was working as a teller. During this transaction, **NICOLE C. WALKER** provided **LATOYA CHAMBERS** the member name and account number for Individual C that she had received from **LATOYA CHAMBERS**. **LATOYA CHAMBERS** withdrew funds from the NGH Credit Union customer's account and gave **NICOLE C. WALKER** the money.
- g. On May 14, 2018, **NICOLE C. WALKER** went to NGH Credit Union on at least three occasions to make cash withdrawals through **LATOYA CHAMBERS** while **LATOYA CHAMBERS** was working as a teller. During these transactions, **NICOLE C. WALKER** provided **LATOYA CHAMBERS** the member names and account numbers for Individuals A, B, and D that she had received from **LATOYA CHAMBERS**. **LATOYA CHAMBERS** withdrew funds from the NGH Credit Union customers' account and gave **NICOLE C. WALKER** the money.
- h. During the May 14, 2018 transactions at NGH Credit Union, **NICOLE C. WALKER** dressed in different costumes in order to avoid being recognized as

the same individual. During the transaction involving Individual A's account, **NICOLE C. WALKER** wore a black and pink outfit. During the transaction involving Individual B's account, **NICOLE C. WALKER** wore a black top, white pants, and a wig. During the transaction involving Individual D's account, **NICOLE C. WALKER** wore a similar outfit to the one she wore while making the transaction involving Individual B's account, but without the wig and with dark sunglasses.

All in violation of Title 18, United States Code, Section 1349.

COUNTS TWO THROUGH SEVEN

THE GRAND JURY FURTHER CHARGES:

1. The Grand Jury re-alleges and incorporates by reference Paragraphs 1 through 11 of Count One, as if fully set forth herein.

2. On or about the dates listed below, with respect to each count, **LATOYA CHAMBERS** and **NICOLE C. WALKER**, in the Middle District of Tennessee, with the intent to defraud, did knowingly execute and attempt to execute the scheme to defraud a financial institution by causing materially false and fraudulent withdrawals from members' accounts as identified below to obtain funds under the custody and control of financial institutions whose deposits were insured by the NCUA:

<b>Count</b>	<b>Date</b>	<b>Account</b>	<b>Member</b>	<b>Withdrawal Amount</b>
Count 2	March 22, 2018	NGH Account No. *110	Individual A	\$2,900.00
Count 3	March 22, 2018	NGH Account No. *661	Individual B	\$2,800.00
Count 4	March 8, 2018	NGH Account No. *020	Individual C	\$2,800.00

Count 5	May 14, 2018	NGH Account No. *110	Individual A	\$1,420.00
Count 6	May 14, 2018	NGH Account No. *661	Individual B	\$1,400.00
Count 7	May 14, 2018	NGH Account No. *920	Individual D	\$1,400.00

In violation of Title 18, United States Code, Sections 1344 and 2.

COUNTS EIGHT THROUGH THIRTEEN

THE GRAND JURY FURTHER CHARGES:

1. The Grand Jury re-alleges and incorporates by reference Paragraphs 1 through 11 of Count One and Paragraphs 1 and 2 of Count Two, as if fully set forth herein.

2. On or about the dates set out above, in the Middle District of Tennessee, **LATOYA CHAMBERS** and **NICOLE C. WALKER** did knowingly use, transfer, and possess, without lawful authority, the means of identification of other persons, specifically, the persons' names and NGH Credit Union account numbers, that may be used alone or in conjunction with any other information to identify a specific individual, during and in relation to felony violations of 18 U.S.C. § 1344. Specifically, **LATOYA CHAMBERS** and **NICOLE C. WALKER** used the names and NGH Credit Union account numbers of Individuals A, B, C, and D to make fraudulent withdrawals of funds from NGH Credit Union accounts for the purpose of executing the scheme to defraud financial institutions by means of materially false pretenses, representations, and promises, and by acts of concealment of the scheme, as described in Counts Two through Seven of this Indictment.

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

FORFEITURE ALLEGATION

1. The allegations contained in this Indictment are re-alleged and incorporated by reference as if fully set forth in support of this forfeiture.

2. Upon conviction of any of Count One (conspiracy to commit bank fraud), Two through Seven (bank fraud), or Eight through Thirteen (aggravated identity theft), **LATOYA CHAMBERS** and **NICOLE C. WALKER** shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 981(a)(1)(C) by Title 28, United States Code, Section 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the offense of conviction, including but not limited to a money judgment against **LATOYA CHAMBERS** and **NICOLE C. WALKER** in an amount to be determined, representing the amount of any property, real or personal, which constitutes or is derived from proceeds traceable to the offense(s) of conviction.

Substitute Property

3. If any of the property described above, as a result of any act or omission of **LATOYA CHAMBERS** and/or **NICOLE C. WALKER**:

- 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 that cannot be divided without difficulty,

the United States shall be entitled to forfeiture of substitute property, and it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any

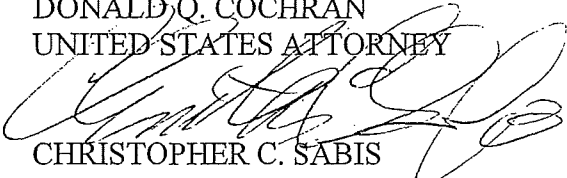
other property of **LATOYA CHAMBERS** and/or **NICOLE C. WALKER**, up to the value of said property listed above as subject to forfeiture.

A TRUE BILL:

A large black rectangular redaction box covering the signature of the foreperson.

FOREPERSON

DONALD Q. COCHRAN  
UNITED STATES ATTORNEY

A handwritten signature in cursive script, appearing to read "Christopher C. Sabis".

CHRISTOPHER C. SABIS  
ASSISTANT UNITED STATES ATTORNEY



CRIMINAL COVER SHEET  
MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION

Petty Offense ( )  
Misdemeanor ( )  
Felony (X)  
Juvenile ( )

County of Offense: Davidson  
AUSA's NAME: Sabis

LaToya Chambers  
Defendant's Full Name

Defendant's Address  
  
John G. Oliva  
Defendant's Attorney

Interpreter Needed? \_\_\_\_\_ Yes X No

If Yes, what language? \_\_\_\_\_

COUNT(S)	TITLE/SECTION	OFFENSE CHARGED	MAX. PRISON	MAX. FINE
1	18 U.S.C. § 1349	Conspiracy to Commit Bank Fraud	30 years	\$1,000,000
2-7	18 U.S.C. § 1344 & 2	Bank Fraud	30 years	\$1,000,000
8-13	18 U.S.C. § 1028A & 2	Aggravated Identity Theft	2 years	N/A

**If the defendant is charged with conspiracy but not with the primary offense, list the primary offense below:**

TITLE/SECTION	OFFENSE	MAX. PRISON	MAX. FINE

Is the defendant currently in custody? Yes ( ) No (X) If yes, State or Federal? \_\_\_\_\_

Has a complaint been filed? Yes ( ) No (X)

If Yes: Name of the Magistrate Judge \_\_\_\_\_ Case No.: \_\_\_\_\_  
Was the defendant arrested on the complaint? Yes ( ) No ( )

Has a search warrant been issued? Yes ( ) No (X)

If Yes: Name of the Magistrate Judge \_\_\_\_\_ Case No.: \_\_\_\_\_

Was bond set by Magistrate/District Judge? Yes ( ) No (X) Amount of bond: \_\_\_\_\_

Is this a Rule 20? Yes ( ) No (X) To/from what district? \_\_\_\_\_  
Is this a Rule 40? Yes ( ) No (X) To/from what district? \_\_\_\_\_

Is this case related to a pending or previously filed case: Yes ( ) No (X)

What is the related case number? \_\_\_\_\_  
Who is the Magistrate Judge? \_\_\_\_\_

Estimated trial time: 2-3 days

The Clerk will issue a Summons/Warrant (circle one)

Bond Recommendation: \_\_\_\_\_

CRIMINAL COVER SHEET  
MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION

Petty Offense ( )  
Misdemeanor ( )  
Felony (X)  
Juvenile ( )

County of Offense: Davidson  
AUSA's NAME: Sabis

Nicole C. Walker  
Defendant's Full Name

Defendant's Address

Interpreter Needed? \_\_\_\_\_ Yes X No

If Yes, what language? \_\_\_\_\_

David Baker  
Defendant's Attorney

COUNT(S)	TITLE/SECTION	OFFENSE CHARGED	MAX. PRISON	MAX. FINE
1	18 U.S.C. § 1349	Conspiracy to Commit Bank Fraud	30 years	\$1,000,000
2-7	18 U.S.C. § 1344 & 2	Bank Fraud	30 years	\$1,000,000
8-13	18 U.S.C. § 1028A & 2	Aggravated Identity Theft	2 years	N/A

If the defendant is charged with conspiracy but not with the primary offense, list the primary offense below:

TITLE/SECTION	OFFENSE	MAX. PRISON	MAX. FINE

Is the defendant currently in custody? Yes ( ) No (X) If yes, State or Federal?

Has a complaint been filed? Yes ( ) No (X)

If Yes: Name of the Magistrate Judge \_\_\_\_\_ Case No.: \_\_\_\_\_  
Was the defendant arrested on the complaint? Yes ( ) No ( )

Has a search warrant been issued? Yes ( ) No (X)

If Yes: Name of the Magistrate Judge \_\_\_\_\_ Case No.: \_\_\_\_\_

Was bond set by Magistrate/District Judge? Yes ( ) No (X) Amount of bond: \_\_\_\_\_

Is this a Rule 20? Yes ( ) No (X) To/from what district? \_\_\_\_\_

Is this a Rule 40? Yes ( ) No (X) To/from what district? \_\_\_\_\_

Is this case related to a pending or previously filed case: Yes ( ) No (X)

What is the related case number? \_\_\_\_\_  
Who is the Magistrate Judge? \_\_\_\_\_

Estimated trial time: 2-3 days

The Clerk will issue a ~~Summons~~ Warrant (circle one)

Bond Recommendation: \_\_\_\_\_