

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA)	
)	No. 21 CR 245
v.)	
)	Violation: Title 18, United States Code,
MARVIN L. COLE,)	Section 1344
a/k/a "Doobie" and)	
REGINALD RUSSELL,)	<u>Under Seal</u>
a/k/a "Frank Abagnale, Jr.")	

The SPECIAL APRIL 2021 GRAND JURY charges:

1. At times material to this Indictment:
 - a. The United States Postal Service ("USPS") sold money orders, up to a value of \$1,000, at post offices nationwide.
 - b. When a USPS money order was purchased, its dollar value was printed on the money order.
 - c. Bank C, Bank E, and Bank F were financial institutions with branches in the Northern District of Illinois, and elsewhere, and whose deposits were insured by the Federal Deposit Insurance Corporation.
2. Beginning in or around December 2017 and continuing through in or around February 2021, in the Northern District of Illinois, Eastern Division, and elsewhere,

MARVIN L. COLE, a/k/a "Doobie," and
REGINALD RUSSELL, a/k/a "Frank Abagnale, Jr.,"

defendants herein, and others, knowingly participated in a scheme to defraud a financial institution and to obtain money and funds owned by and under the custody and control of a financial institution by means of materially false and fraudulent pretenses, representations, and promises, as further described below.

3. It was part of the scheme that defendants COLE and RUSSELL obtained and caused to be obtained USPS money orders that were altered and counterfeited, presented the altered and counterfeited money orders to financial institutions, including Bank C, Bank E, and Bank F, and deposited and caused the deposit of the altered and counterfeited money orders into third-party bank accounts, thereby fraudulently inflating the account balances in the accounts. It was part of the scheme that defendants withdrew and spent, and caused to be withdrawn and spent, funds from the third-party bank accounts, and kept the proceeds of the scheme.

4. It was further part of the scheme that defendants COLE and RUSSELL obtained and caused to be obtained USPS money orders that had been purchased from post offices in amounts less than approximately \$10, so that the money orders could be altered to higher amounts, typically between \$800 and \$1,000.

5. It was further part of the scheme that defendants COLE and RUSSELL recruited and caused to be recruited third parties in order to obtain access to bank accounts belonging to the third parties, knowing that the third-party accounts would be used to deposit money orders that were altered to amounts that were higher than their actual value.

6. It was further part of the scheme that defendants COLE and RUSSELL knowingly deposited and caused to be deposited altered and counterfeited money orders into third-party bank accounts to which they had access, for the purpose of fraudulently inflating the balances in those third-party bank accounts.

7. It was further part of the scheme that defendants COLE and RUSSELL, knowing that altered and counterfeited money orders had been deposited into the third-party bank accounts to which they had access, made and caused to be made withdrawals and purchases from the third-party bank accounts, and collected and kept money from financial institutions.

8. It was further part of the scheme that defendants COLE and RUSSELL misrepresented, concealed, and hid, and caused to be misrepresented, concealed, and hidden, certain material facts, including the acts and purposes of the acts done in furtherance of the scheme.

9. As a result of the scheme, defendants COLE and RUSSELL caused at least approximately \$132,593 in altered and counterfeit money orders to be deposited into bank accounts.

10. On or about the following dates, in the Northern District of Illinois, Eastern Division, and elsewhere, defendants COLE and RUSSELL knowingly executed the above-described scheme by causing the following transactions involving accounts at financial institutions:

<u>Count</u>	<u>Defendant</u>	<u>Date</u>	<u>Transaction</u>
One	MARVIN L. COLE	Dec 10 2018	\$2,970 deposit into Individual E's account at Bank C
Two	MARVIN L. COLE	Jan 29 2019	\$1,500 withdrawal from Individual F's account at Bank F
Three	MARVIN L. COLE	Jun 20 2019	\$500 withdrawal from Individual G's account at Bank C
Four	REGINALD RUSSELL	Aug 26 2019	\$1,900 deposit into Individual H's account at Bank E
Five	REGINALD RUSSELL	Aug 29 2019	\$1,900 deposit into Individual I's account at Bank E
Six	REGINALD RUSSELL	Sep 12 2019	\$950 deposit into Individual J's account at Bank E
Seven	MARVIN L. COLE	Sep 24 2019	\$1,900 deposit into Individual K's account at Bank E
Eight	MARVIN L. COLE	Sep 25 2019	\$800 withdrawal from Individual K's account at Bank E
Nine	REGINALD RUSSELL	Oct 11 2019	\$1,900 deposit into Individual L's account at Bank E

In violation of Title 18, United States Code, Section 1344.

A TRUE BILL:

FOREPERSON

UNITED STATES ATTORNEY