

2. Beginning in or around December 2016 and continuing through in or around September 2020, in the Northern District of Illinois, Eastern Division, and elsewhere,

DARIUS D. GOODWIN,
VICTOR J. JOHNSON,
LANCE BRANDON COLE, a/k/a “Lano,”
MUNANG O. EKOI,
SERNARD D. GILL, JR., and
ARMANI M. SPENCER-SPRATTLIN,

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 GOODWIN, JOHNSON, COLE, EKOI, GILL, and SPENCER-SPRATTLIN 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 E, Bank F, Bank H, Bank I, and Credit Union A, 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 It was part of the scheme that defendants withdrew and spent, and caused to be withdrawn and spent, funds from the third-party bank accounts, and kept the proceeds of the scheme.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 GOODWIN, JOHNSON, COLE, EKOI, GILL, and SPENCER-SPRATTLIN 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 defendant COLE purchased and caused to be purchased USPS money orders from post offices in amounts between approximately \$280 and \$990, so that the money orders could be duplicated and counterfeited.

6. It was further part of the scheme that defendants GOODWIN, JOHNSON, COLE, EKOI, GILL, and SPENCER-SPRATTLIN 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.

7. It was further part of the scheme that defendants GOODWIN, JOHNSON, COLE, EKOI, GILL, and SPENCER-SPRATTLIN 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.

8. It was further part of the scheme that defendants GOODWIN, JOHNSON, COLE, EKOI, GILL, and SPENCER-SPRATTLIN, knowing that altered and counterfeited money orders had been deposited into the third-party bank accounts to which defendants 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.

9. It was further part of the scheme that defendants GOODWIN, JOHNSON, COLE, EKOI, GILL, and SPENCER-SPRATTLIN 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.

10. As a result of the scheme, defendants GOODWIN, JOHNSON, COLE, EKOI, GILL, and SPENCER-SPRATTLIN caused at least approximately \$895,000 in altered and counterfeit money orders to be deposited into bank accounts.

11. On or about the following dates, in the Northern District of Illinois, Eastern Division, and elsewhere, defendants GOODWIN, JOHNSON, COLE, EKOI, GILL, and SPENCER-SPRATTLIN knowingly executed the above-described scheme by causing the following transactions involving accounts at financial institutions:

<u>Count</u>	<u>Defendant(s)</u>	<u>Date</u>	<u>Transaction</u>
One	LANCE BRANDON COLE	Dec 28 2016	\$2,116 deposit into Individual M's account at Bank E
Two	ARMANI M. SPENCER-SPRATTLIN	Jan 9 2017	\$800 deposit into Individual M's account at Bank E
<u>Count</u>	<u>Defendant(s)</u>	<u>Date</u>	<u>Transaction</u>
Three	ARMANI M. SPENCER-SPRATTLIN	Jan 10 2017	\$2,300 deposit into Individual M's account at Bank E

Four	ARMANI M. SPENCER-SPRATTLIN	Sep 20 2017	\$3,000 withdrawal from Individual N's account at Bank F
Five	LANCE BRANDON COLE MUNANG O. EKOI	Apr 2 2018	\$5,940 deposit into Individual O's account at Bank H
Six	MUNANG O. EKOI	Jan 31 2019	\$2,950 deposit into Individual P's account at Bank E
Seven	MUNANG O. EKOI	Jan 31 2019	\$1,975 deposit into Individual Q's account at Bank E
Eight	MUNANG O. EKOI	Feb 4 2019	\$2,950 deposit into Individual R's account at Bank E
Nine	SERNARD D. GILL, JR.	Feb 27 2019	\$2,940 deposit into Individual S's account at Bank E
Ten	VICTOR J. JOHNSON	Mar 2 2019	\$1,003.74 withdrawal from Individual T's account at Bank H
Eleven	LANCE BRANDON COLE	Mar 2 2019	\$1,003.74 withdrawal from Individual T's account at Bank H
Twelve	VICTOR J. JOHNSON	Mar 3 2019	\$1,003.74 withdrawal from Individual T's account at Bank H
Thirteen	SERNARD D. GILL, JR.	Mar 7 2019	\$4,950 deposit into Individual U's account at Bank I
Fourteen	ARMANI M. SPENCER-SPRATTLIN	Mar 8 2019	\$990 deposit into Individual V's account at Bank E
Fifteen	DARIUS D. GOODWIN	Mar 8 2019	\$990 deposit into Individual U's account at Bank I
<u>Count</u>	<u>Defendant(s)</u>	<u>Date</u>	<u>Transaction</u>
Sixteen	DARIUS D. GOODWIN	Mar 8 2019	\$1,003.74 withdrawal from Individual T's account at Bank H
Seventeen	VICTOR J. JOHNSON	Mar 8 2019	\$1,003.74 withdrawal from Individual T's account at Bank H

Eighteen	DARIUS D. GOODWIN	May 1 2019	\$500 deposit into Individual W's account at Bank E
Nineteen	MUNANG O. EKOI	Aug 8 2019	\$4,000 deposit into Individual X's account at Credit Union A
Twenty	SERNARD D. GILL, JR.	Aug 26 2019	\$3,000 deposit into Individual Y's account at Credit Union A
Twenty-One	VICTOR J. JOHNSON	Sep 17 2019	\$4,000 deposit into Individual Z's account at Credit Union A

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

A TRUE BILL:

FOREPERSON

UNITED STATES ATTORNEY