

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Southern District of Georgia

United States of America )

v. )

LORI BRIGHTWELL )

Case No. 4:17mj-84

U. S. DISTRICT COURT  
Southern District of GA  
Filed In Office

10:26 M

9-28 2017

Defendant(s)

Deputy Clerk

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of December 29, 2015 in the county of Chatham in the Southern District of Georgia, the defendant(s) violated:

Code Section

Offense Description

18 U.S.C. § 1028(a)(7)

Identity Theft

This criminal complaint is based on these facts:

See Attached Affidavit

Continued on the attached sheet.

*William H. Griffin, Jr.*  
Complainant's signature

William H. Griffin, Jr., Special Agent, USSS  
Printed name and title

Sworn to before me and signed in my presence.

Date: 9-28-17

*G.R. Smith*  
Judge's signature

City and state: Savannah, Georgia

Hon. G.R. Smith, United States Magistrate Judge  
Printed name and title

**AFFIDAVIT**

I, Special Agent William Griffin, having been duly sworn, depose and state the following:

**INTRODUCTION**

1. I have been a Special Agent with the United States Secret Service since July 2002. I am currently assigned to the Savannah Resident Office (“SAVRO”). As part of my duties with the SAVRO, I investigate federal financial crimes, including identity theft, bank fraud, access device fraud, mail fraud, and wire fraud. I have completed the Federal Law Enforcement Criminal Investigators Training Program at Glynco, Georgia, and the United States Secret Service Special Agent Training Course in Beltsville, Maryland. Further, I have participated in and led numerous fraud investigations. Additionally, I have worked with other agents and law enforcement personnel who have extensive investigative experience and training with respect to financial crimes.

2. Based on my training, experience, and participation in financial crime investigations, I know that persons who commit identity theft can and do conspire with other individuals involved in bank fraud, wire fraud, access device fraud and mail fraud. Furthermore, I know that personally identifiable information (“PII”) can be and is communicated through different means of wire and electronic communications, such as text messages and telephone calls, in furtherance of the schemes to defraud.

**PURPOSE OF THE AFFIDAVIT**

3. This Affidavit is made in support of an application for an Arrest Warrant and Criminal Complaint charging Lori Brightwell (“BRIGHTWELL”) with a violation of 18 U.S.C. § 1028(a)(7) (Identity Theft).

**FACTS DEMONSTRATING PROBABLE CAUSE**

4. On July 25, 2017, following a jury trial in the Southern District of Georgia, Maynard Sanders (“SANDERS”) was convicted of violating 18 U.S.C. § 1344 (Bank Fraud), 18 U.S.C. § 1028A (Aggravated Identity Theft), and 18 U.S.C. §§ 656 & 2 (Aiding and Abetting Theft by a Bank Employee). Investigation conducted prior to, during, and following the trial has revealed that, in furtherance of his crimes, SANDERS utilized PII that had been unlawfully obtained and transferred by Melody Johnson (“JOHNSON”) and BRIGHTWELL.

5. On May 31, 2017, pursuant to a federal search warrant, Task Force Officer Josh Reed (“TFO Reed”), a member of the U.S. Secret Service Atlanta Field Office Electronic Crimes Task Force, conducted a mobile data extraction examination of a mobile device that had been seized from SANDERS on January 24, 2017. TFO Reed’s examination revealed a text conversation between SANDERS and mobile telephone number 912-508-8734 beginning in December 2015 and continuing into April 2016. Database queries by the Secret Service revealed, and subsequent admissions by JOHNSON confirmed, that mobile telephone number 912-508-8734 was assigned to and utilized by JOHNSON in 2015 and 2016.

6. A review of the text conversation between SANDERS and JOHNSON revealed that SANDERS and JOHNSON passed PII belonging to S.R., an 87-year-old former resident of Savannah, on December 29, 2015. Specifically, SANDERS sent messages to JOHNSON with S.R.’s Social Security number and home address. Between 6:30 pm and 6:37 pm on that date, SANDERS sent JOHNSON additional text messages stating, “Bc that means the credit card don’t work smh,” “Okay how u know she trying to find out now right,” and “Yep ok so why would she think the card will work.”

7. On July 18, 2017, I interviewed JOHNSON regarding her communications and involvement with SANDERS. According to JOHNSON, the references to “she” in the above-quoted text messages were to BRIGHTWELL. JOHNSON explained that, while working as a home healthcare aide, BRIGHTWELL had obtained and misappropriated a client’s PII, which SANDERS intended to utilize to facilitate fraudulent schemes for his benefit and BRIGHTWELL’s. At the time of the text message conversation with SANDERS, JOHNSON and SANDERS were romantically involved with each other, and JOHNSON had maintained a friendship with BRIGHTWELL. According to JOHNSON, SANDERS utilized JOHNSON as a middleman between himself and BRIGHTWELL.

8. On or about August 3, 2017, in response to a federal grand jury subpoena, Comfort Keepers Home Care (“Comfort Keepers”), a Savannah-based home healthcare agency, confirmed that it had employed BRIGHTWELL as a home healthcare aide in 2014. Comfort Keepers further confirmed that, on approximately a dozen occasions in mid-2014, BRIGHTWELL had performed home healthcare services for S.R. within the Southern District of Georgia.

9. Databases queries revealed that BRIGHTWELL was associated with mobile telephone numbers 912-308-3063 and 912-220-0438.


10. On or about August 8, 2017, in response to a federal grand jury subpoena, Sprint Corp. produced toll records for mobile number 912-508-8734 that confirmed numerous phone contacts between JOHNSON and BRIGHTWELL in late 2015 and early 2016. Specifically, JOHNSON and BRIGHTWELL exchanged six telephone calls within approximately one hour before and one hour after the text conversation between SANDERS and JOHNSON regarding S.R.’s PII and “card.”

11. On September 17, 2017, Secret Service Senior Special Agent Matthew Britsch and I interviewed BRIGHTWELL regarding her interactions with JOHNSON and SANDERS. BRIGHTWELL admitted to having provided JOHNSON with an access device card number that specifically identified S.R. BRIGHTWELL explained that she expected SANDERS would use S.R.'s access device card number to commit fraud and theft. BRIGHTWELL also confirmed that she communicated with JOHNSON in December 2015 and that mobile telephone numbers 912-308-3063 and 912-220-0438 were previously assigned to her (*i.e.*, BRIGHTWELL). According to BRIGHTWELL, she expected to receive \$330.00 from SANDERS for providing S.R.'s PII to JOHNSON.

12. All relevant acts and communications referred to above occurred within the Southern District of Georgia.

**CONCLUSION**

13. Based upon the foregoing facts and information, I submit there is probable cause to believe that Lori Brightwell did knowingly transfer, possess, and use, without lawful authority, a means of identification of S.R. with the intent to aid or abet violations of Federal law and felony offenses under Georgia law, all in violation of 18 U.S.C. § 1028(a)(7) (Identity Theft).

  
WILLIAM H. GRIFFIN, JR.  
Special Agent  
United States Secret Service

Subscribed and sworn to before me on September 28, 2017.

  
\_\_\_\_\_  
HON. G.R. SMITH  
UNITED STATES MAGISTRATE JUDGE  
SOUTHERN DISTRICT OF GEORGIA