

FILED

NOV 30 2017

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

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

UNITED STATES OF AMERICA

v.

JOHN V. KNAPP

17CR 780
No.

Violations: Title 18, United
States Code, Sections
1028A(a)(1), 1029(a)(5)
1341 and 1343

COUNT ONE

JUDGE COLEMAN
MAGISTRATE JUDGE VALDEZ

The SPECIAL FEBRUARY 2017 GRAND JURY charges:

1. At times material to this indictment:

a. Defendant John V. Knapp lived in Romeoville, Illinois. Defendant controlled and was the sole beneficiary of bank accounts at Chase Bank in his name and in the name of his deceased mother. Defendant was married to one of Victim A's daughters.

b. Victim A was a senior citizen in her nineties, who lived in Chicago. Victim A had investments with MetLife, Inc. Victim A maintained a bank account at Bank of America, which bank account was jointly owned with her daughters for Victim A's benefit. Victim A also had Bank of America credit cards issued in her name.

c. Defendant Knapp opened and maintained an account with a corporation headquartered in San Francisco, California providing mobile payment processing services including for credit card and debit card transactions. This account allowed defendant to obtain funds from credit card and debit card transactions.

2. Beginning no later than in or about early 2014 and continuing at least until in or about August 2015, in the Northern District of Illinois, Eastern Division, and elsewhere,

JOHN V. KNAPP,

defendant herein, devised, intended to devise, and participated in a scheme to defraud Victim A, MetLife and Bank of America, and to obtain money and property from them by means of materially false and fraudulent pretenses, representations and promises, and by concealment of material facts, which scheme is more fully described below.

3. It was part of the scheme that defendant Knapp fraudulently assumed the identity of Victim A, misrepresented his identity to MetLife and fraudulently withdrew for his own benefit approximately \$129,500 from MetLife, which belonged to Victim A. Moreover, defendant Knapp fraudulently misappropriated additional funds for his benefit from Victim A's Bank of America account and fraudulently misused her Bank of America credit card to benefit himself.

4. It was further part of the scheme that on or about December 15, 2014, while Victim A was hospitalized, defendant Knapp called MetLife, falsely identified himself as Victim A and provided Victim A's address, date of birth and investment account number as his own. Defendant then fraudulently authorized the withdrawal of \$45,000 belonging to Victim A from MetLife.

5. It was further part of the scheme that on or about December 22, 2014, the fraudulently obtained \$45,000 from MetLife was deposited into Victim A's Bank

of America account. That same day, defendant Knapp fraudulently caused a check to be made payable to him for \$25,000 out of Victim A's Bank of America account, which check defendant caused to be deposited into his Chase Bank account. On or about December 23, 2014, defendant Knapp fraudulently caused a check to be made payable to his deceased mother for \$15,000 from Victim A's Bank of America account, which check defendant caused to be deposited into his deceased mother's account at Chase Bank.

6. It was further part of the scheme that on or about December 24, 2014, a day on which Victim A was being transferred from a hospital to a physical rehabilitation facility, defendant Knapp called MetLife, fraudulently identified himself as Victim A and provided Victim A's investment contract number, last four social security number digits, home address and date of birth as his own. Defendant then fraudulently authorized the withdrawal of another \$45,000 belonging to Victim A from MetLife.

7. It was further part of the scheme that on or about January 2, 2015, the fraudulently withdrawn \$45,000 from MetLife on December 24, 2014 was deposited into Victim A's Bank of America account. That same day, defendant Knapp fraudulently caused checks to be issued on Victim A's Bank of America account for \$24,000 to his deceased mother and for \$23,500 to defendant. Defendant caused these checks to be deposited into his deceased mother's account and his account respectively at Chase Bank.

8. It was further part of the scheme that on or about January 21, 2015, while Victim A was in a physical rehabilitation facility, defendant Knapp called MetLife, fraudulently identified himself as Victim A and provided Victim A's last four digits of her social security number, date of birth and address as his own. Defendant then fraudulently authorized two withdrawals from MetLife totaling \$30,000, which funds belonged to Victim A.

9. It was further part of the scheme that on or about January 23, 2015, the fraudulently withdrawn \$30,000 was deposited into Victim A's Bank of America account. The same day, defendant Knapp fraudulently caused a check for \$25,000 made payable to his deceased mother to be issued on Victim A's bank account. Defendant caused this check to be deposited into his deceased mother's account at Chase Bank.

10. It was further part of the scheme that on or about March 10, 2015, while Victim A was a patient at a physical rehabilitation facility, defendant Knapp called MetLife, falsely identified himself as Victim A and provided Victim A's address and telephone number as his own. Defendant also provided hdvorak1305@comcast.net as Victim A's email address, when defendant was the subscriber. Defendant fraudulently authorized two withdrawals from MetLife totaling \$9500 of funds belonging to Victim A.

11. On or about March 17, 2015, the fraudulently withdrawn \$9500 was deposited into Victim A's Bank of America account. The same day, defendant fraudulently caused a \$15,000 check drawn on Victim A's Bank of America account

to be issued to his deceased mother and then deposited into his deceased mother's account at Chase Bank.

12. It was further part of the scheme that, in addition to the \$127,500 of fraudulently issued checks on Victim A's Bank of America account described above, defendant Knapp fraudulently caused more than \$10,000 in additional checks to be issued to him from Victim A's Bank of America account.

13. It was further part of the scheme that defendant Knapp fraudulently caused more than 25 debit card transactions in Victim A's Bank of America account benefitting an account controlled by defendant with a corporation providing credit card and debit card transactions processing. Defendant then caused funds from these transactions, minus processing fees, to be deposited into his deceased mother's Chase Bank account.

14. It was further part of the scheme that defendant Knapp fraudulently caused more than 50 Bank of America credit card transactions using Victim A's credit cards benefitting an account controlled by defendant with a corporation providing credit card and debit card transactions processing. Defendant then caused funds from these transactions, minus processing fees, to be deposited into his deceased mother's Chase Bank account.

15. It was further part of the scheme that defendant Knapp misrepresented, concealed and hid and caused to be misrepresented, concealed and hidden, certain material facts, including acts and purposes of the acts done in furtherance of the scheme.

16. As a result of this scheme, defendant Knapp fraudulently misappropriated over \$170,000 from Victim A, fraudulently induced MetLife to transfer \$129,500, and fraudulently engaged in financial transactions affecting Bank of America, including fraudulently generating a credit card balance of more than \$20,000 in Victim A's Bank of America credit card account.

17. On or about December 15, 2014, in Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

JOHN V. KNAPP,

defendant herein, for the purpose of executing the scheme to defraud, knowingly caused to be transmitted by means of wire communication in interstate commerce, certain writings, signs and signals, namely an interstate telephone call from Chicago, Illinois to MetLife in Tulsa, Oklahoma for the purpose of fraudulently obtaining funds belonging to Victim A;

In violation of Title 18, United States Code, Section 1343.

COUNT TWO

The SPECIAL FEBRUARY 2017 GRAND JURY further charges:

1. Paragraphs 1 through 16 of Count One of this indictment are incorporated here.

2. On or about December 24, 2014, in Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

JOHN V. KNAPP,

defendant herein, for the purpose of executing the scheme to defraud, knowingly caused to be transmitted by means of wire communication in interstate commerce, certain writings, signs and signals, namely a telephone call from Chicago to MetLife in Tulsa, Oklahoma, for the purpose of fraudulently obtaining funds belonging to Victim A;

In violation of Title 18, United States Code, Section 1343.

COUNT THREE

The SPECIAL FEBRUARY 2017 GRAND JURY further charges;

1. Paragraphs 1 through 16 of Count One of this indictment are incorporated here.

2. On or about January 21, 2015, in Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

JOHN V. KNAPP,

defendant herein, for the purpose of executing the scheme to defraud, knowingly caused to be transmitted by means of wire communication in interstate commerce, certain writings, signs and signals, namely a telephone call from Chicago to MetLife in Tulsa, Oklahoma, for the purpose of fraudulently obtaining funds belonging to Victim A;

In violation of Title 18, United States Code, Section 1343.

COUNT FOUR

The SPECIAL FEBRUARY 2017 GRAND JURY further charges:

1. Paragraphs 1 through 16 of Count One of this indictment are incorporated here.

2. On or about March 10, 2015, in Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

JOHN V. KNAPP,

defendant herein, for the purpose of executing the scheme to defraud, knowingly caused to be transmitted by means of wire communication in interstate commerce, certain writings, signs and signals, namely a telephone call from Chicago to MetLife in Tulsa, Oklahoma, for the purpose of fraudulently obtaining funds belonging to Victim A;

In violation of Title 18, United States Code, Section 1343.

COUNT FIVE

The SPECIAL FEBRUARY 2017 GRAND JURY further charges:

1. Paragraphs 1 through 16 of Count One of this indictment are incorporated here.

2. On or about December 22, 2014, in Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

JOHN V. KNAPP,

defendant herein, for the purpose of executing the scheme to defraud and attempting to do so, knowingly caused to be delivered by mail according to the direction thereon from Pennsylvania to Chicago, Illinois an envelope containing a MetLife check in the amount of \$45,000;

In violation of Title 18, United States Code, Section 1341.

COUNT SIX

The SPECIAL FEBRUARY 2017 GRAND JURY further charges:

1. Paragraphs 1 through 16 of Count One of this indictment are incorporated here.

2. On or about January 2, 2015, in Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

JOHN V. KNAPP,

defendant herein, for the purpose of executing the scheme to defraud and attempting to do so, knowingly caused to be delivered by mail according to the direction thereon from Pennsylvania to Chicago, Illinois an envelope containing a MetLife check in the amount of \$45,000;

In violation of Title 18, United States Code, Section 1341.

COUNT SEVEN

The SPECIAL FEBRUARY 2017 GRAND JURY further charges:

1. Paragraphs 1 through 16 of Count One of this indictment are incorporated here.

2. On or about March 17, 2015, in Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

JOHN V. KNAPP,

defendant herein, for the purpose of executing the scheme to defraud and attempting to do so, knowingly caused to be delivered by mail according to the direction thereon from Pennsylvania to Chicago, Illinois an envelope containing a MetLife check in the amount of \$5000;

In violation of Title 18, United States Code Section 1341.

COUNT EIGHT

The SPECIAL FEBRUARY 2017 GRAND JURY further charges:

1. Paragraphs 1 through 16 of Count One of this indictment are incorporated here.
2. On or about March 17, 2015, in Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

JOHN V. KNAPP,

defendant herein, for the purpose of executing the scheme to defraud and attempting to do so, knowingly caused to be delivered by mail according to the direction thereon from Pennsylvania to Chicago, Illinois an envelope containing a MetLife check in the amount of \$4500;

In violation of Title 18, United States Code, Section 1341.

COUNT NINE

The SPECIAL FEBRUARY 2017 GRAND JURY further charges:

1. Paragraphs 1 through 16 of Count One of this indictment are incorporated here.
2. On or about December 15, 2014, in the Northern District of Illinois, Eastern Division, and elsewhere,

JOHN V. KNAPP,

defendant herein, knowingly transferred, possessed and used, without lawful authority, a means of identification of another person, knowing the means of identification belonged to another person, namely the name, address, date of birth and investment account number belonging to Victim A, during and in relation to the wire fraud offense described in Count One of this indictment;

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

COUNT TEN

The SPECIAL FEBRUARY 2017 GRAND JURY further charges:

1. Paragraphs 1 and 2 of Count Two of this indictment are incorporated here.
2. On or about December 24, 2014, in the Northern District of Illinois, Eastern Division, and elsewhere,

JOHN V. KNAPP,

defendant herein, knowingly transferred, possessed and used, without lawful authority, a means of identification of another person, knowing the means of identification belonged to another person, namely the name, investment account number, address, date of birth and last four digits of the social security number belonging to Victim A, during and in relation to the wire fraud offense described in Count Two of this indictment;

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

COUNT ELEVEN

The SPECIAL FEBRUARY 2017 GRAND JURY further charges:

1. Paragraphs 1 and 2 of Count Three of this indictment are incorporated here.

2. On or about January 21, 2015, in the Northern District of Illinois, Eastern Division, and elsewhere,

JOHN V. KNAPP,

defendant herein, knowingly transferred, possessed and used, without lawful authority, a means of identification of another person, knowing the means of identification belonged to another person, namely the name, date of birth, address and last four digits of the social security number belonging to Victim A, during and in relation to the wire fraud offense described in Count Three of this indictment;

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

COUNT TWELVE

The SPECIAL FEBRUARY 2017 GRAND JURY further charges:

1. Paragraphs 1 and 2 of Count Four of this indictment are incorporated here.
2. On or about March 10, 2015, in the Northern District of Illinois, Eastern Division, and elsewhere,

JOHN V. KNAPP,

defendant herein, knowingly transferred, possessed and used, without lawful authority, a means of identification of another person, knowing the means of identification belonged to another person, namely the name, address and telephone number belonging to Victim A, during and in relation to the wire fraud offense described in Count Four of this indictment;

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

COUNT THIRTEEN

The SPECIAL FEBRUARY 2017 GRAND JURY further charges:

1. Paragraphs 1 and 3 through 16 of Count One of this indictment are incorporated here.

2. During a period from in or about April 2014 to at least in or about August 2015, in the Northern District of Illinois, Eastern Division, and elsewhere,

JOHN V. KNAPP,

defendant herein, knowingly and with intent to defraud effected transactions with one or more access devices issued to another person to receive payment or other things of value aggregating at least \$1000 during a one year period, which conduct affected interstate commerce. Specifically, defendant fraudulently effected transactions with Bank of America credit cards belonging to Victim A with proceeds, minus processing fees, from the transactions ultimately being deposited into defendant's deceased mother's account at Chase Bank;

In violation of Title 18, United States Code, Section 1029(a)(5).

A TRUE BILL:

FOREPERSON

UNITED STATES ATTORNEY