

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>UNITED STATES OF AMERICA</b>	<b>:</b>	<b>CRIMINAL NO.</b>
<b>v.</b>	<b>:</b>	<b>DATE FILED</b>
<b>MICHAEL BULLOCK</b>	<b>:</b>	<b>VIOLATIONS:</b>
	<b>:</b>	<b>18 U.S.C. § 1344 (bank fraud - 1 count)</b>
	<b>:</b>	<b>18 U.S.C. § 1028A(a)(1) (aggravated identity theft - 1 count)</b>
	<b>:</b>	<b>18 U.S.C. § 2 (aiding and abetting) Notice of forfeiture</b>

**INDICTMENT**

**COUNT ONE**

**THE GRAND JURY CHARGES THAT:**

1. At all times material to this indictment, TD Bank was a financial institution whose deposits were insured by the Federal Deposit Insurance Corporation, Certificate Number 18409.

2. From sometime prior to February 17, 2012 and continuing to on or about February 24, 2012, in the Eastern District of Pennsylvania and elsewhere, defendant

**MICHAEL BULLOCK**

knowingly executed, attempted to execute, and aided and abetted the execution of, a scheme to defraud TD Bank and to obtain monies owned by and under the care, custody, and control of TD Bank by means of false and fraudulent pretenses, representations, and promises.

**THE SCHEME**

3. Co-schemer Patricia Lightsey, charged elsewhere, who was then a teller at TD Bank, and other co-schemers known and unknown to the grand jury, obtained confidential TD Bank customer account information for TD Bank customers who had large balances in their bank accounts.

4. Co-schemers known and unknown to the grand jury recruited other persons, referred to as “runners,” to pose as TD Bank customers, enter TD Bank branches, and access TD Bank customer accounts, by promising to pay the runners a portion of the amounts they were able to successfully withdraw from the TD Bank customer accounts.

5. Co-schemers known and unknown to the grand jury provided false drivers’ licenses containing the names of TD Bank customers but with the runners’ photographs, as well as other means of identification and identity information, including the names, dates of birth, drivers’ license numbers, social security numbers, and bank account numbers of TD Bank customers, to runners, including defendant MICHAEL BULLOCK and Ron Credle, charged elsewhere.

6. Co-schemers known and unknown to the grand jury instructed the runners to come to Philadelphia, Pennsylvania in order to obtain the false drivers’ licenses and other means of identification and identity information of the TD Bank customers.

7. Co-schemers known and unknown to the grand jury drove the runners, including defendant MICHAEL BULLOCK and Ron Credle, to various TD Bank branches within the Eastern District of Pennsylvania, the District of Maryland, the District of Delaware, and elsewhere, and instructed the runners to cash fraudulent checks made payable to and drawn on the accounts of TD Bank customers, and withdraw specific amounts of money from the accounts of the TD Bank customers, by utilizing the means of identification, identity information, and drivers’ licenses that had been provided to them.

8. On multiple occasions, without the knowledge and consent of the TD Bank customers whose accounts they accessed, defendant MICHAEL BULLOCK, Ron Credle, and other co-schemers known and unknown to the grand jury cashed and attempted to cash fraudulent checks, withdrew and attempted to withdraw cash, and preformed other actions in

furtherance of the scheme to defraud TD Bank, including the following:

a. On February 17, 2012, at a TD Bank Branch in Silver Springs, Maryland, defendant MICHAEL BULLOCK withdrew \$5,000 from the TD Bank account of customer L.C. ending in 1878. At the time defendant BULLOCK made this withdrawal, he presented a driver's license in L.C.'s name but containing defendant BULLOCK's photograph.

b. On February 20, 2012, defendant MICHAEL BULLOCK drove by car from Virginia to Philadelphia, Pennsylvania, intending to obtain false drivers' licenses and make withdrawals from the bank accounts of TD Bank customers who had not authorized defendant BULLOCK to access their accounts.

c. On February 23, 2012, defendant MICHAEL BULLOCK drove by car from Virginia to Philadelphia, Pennsylvania, intending to obtain false drivers' licenses and make withdrawals from the bank accounts of TD Bank customers who had not authorized defendant BULLOCK to access their accounts.

d. On February 24, 2012, defendant MICHAEL BULLOCK and Ron Credle drove together from Philadelphia, Pennsylvania, to a TD Bank branch in Wilmington Delaware.

e. On February 24, 2012, at a TD Bank branch in Wilmington, Delaware, Ron Credle attempted to withdraw \$5,000 from the TD Bank account of customer M.C. ending in 5639. At the time Credle attempted to withdraw this cash, he presented a driver's license in M.C.'s name but containing Credle's photograph.

f. On February 24, 2012, at a TD Bank branch in Wilmington, Delaware, defendant MICHAEL BULLOCK attempted to cash a fraudulent check in the amount of \$6,426.12. At the time he attempted to cash this fraudulent check, defendant BULLOCK presented a driver's license in the name of TD Bank customer C.J. but containing defendant

presented a driver's license in the name of TD Bank customer C.J. but containing defendant BULLOCK's photograph.

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

**COUNT TWO**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about February 17, 2012, in the District of Maryland, defendant

**MICHAEL BULLOCK**

knowingly and without lawful authority, possessed and used, and aided and abetted the possession and use of, a means of identification of another person, that is, the name and TD Bank account number of L.C., during and in relation to bank fraud.

In violation of Title 18, United States Code, Sections 1028A(a)(1), (c)(5), and 2.

## NOTICE OF FORFEITURE

### THE GRAND JURY FURTHER CHARGES THAT:

1. As a result of the violations of Title 18, United States Code, Section 1344 set forth in this indictment, defendant

#### MICHAEL BULLOCK

shall forfeit to the United States of America any property constituting, or derived from, proceeds obtained directly or indirectly from the commission of such offense, including but not limited to \$5,000 in United States currency (money judgment).

2. If any of the property described above, as a result of any actor omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred to, sold to, or deposited with a third party;
- c. has been placed beyond the jurisdiction of this Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intention of the United States, pursuant to Title 18, United States Code, Section 982(b), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property subject to forfeiture.

All pursuant to Title 18, United States Code, Section 982(a)(2)(A).

**A TRUE BILL:**

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**GRAND JURY FOREPERSON**



**ZANE DAVID MEMEGER**  
**UNITED STATES ATTORNEY**