

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

<b>UNITED STATES OF AMERICA</b>	<b>:</b>	<b>CRIMINAL NO. 13-_____</b>
<b>v.</b>	<b>:</b>	<b>DATE FILED: _____</b>
<b>MALIK BURTON, KYLE GUMBS, RAYVAUGHAN WHITE</b>	<b>:</b>	<b>VIOLATIONS: 18 U.S.C. § 371 (conspiracy - 1 count) 18 U.S.C. § 472 (passing counterfeit federal reserve notes - 1 count) 18 U.S.C. § 472 (possessing counterfeit federal reserve notes - 2 counts) 18 U.S.C. § 2 (aiding and abetting) Notice of forfeiture</b>

**INDICTMENT**

**COUNT ONE**

**THE GRAND JURY CHARGES THAT:**

1. On or about November 15, 2012, in Bensalem Township, in the Eastern District of Pennsylvania and elsewhere, defendants

**MALIK BURTON,  
KYLE GUMBS, and  
RAYVAUGHAN WHITE**

conspired and agreed, together and with others known and unknown to the grand jury, to commit an offense against the United States, that is, with intent to defraud, possessing, concealing, passing, and attempting to pass, falsely made, forged, and counterfeited obligations of the United States, that is, approximately \$5,700 in counterfeit \$100 Federal Reserve Notes, in violation of Title 18, United States Code, Section 472.

## **MANNER AND MEANS**

2. It was part of the conspiracy that defendants MALIK BURTON, KYLE GUMBS and RAYVAUGHAN WHITE purchased counterfeit currency from an individual unknown to the grand jury.

It was a further part of the conspiracy that:

3. Defendants MALIK BURTON, KYLE GUMBS and RAYVAUGHAN WHITE purchased items, and attempted to purchase items, from stores in the Neshaminy Mall and elsewhere in Bensalem Township, Pennsylvania using the counterfeit \$100 bills.

4. By operation of this scheme, defendants MALIK BURTON, KYLE GUMBS and RAYVAUGHAN WHITE passed and attempted to pass approximately \$5,700 in counterfeit currency.

## **OVERT ACTS**

In furtherance of the conspiracy and to accomplish its objects, defendants MALIK BURTON, KYLE GUMBS and RAYVAUGHAN WHITE committed the following overt acts, among others, in the Eastern District of Pennsylvania and elsewhere:

On or about November 15, 2012:

1. Defendants MALIK BURTON, KYLE GUMBS and RAYVAUGHAN WHITE purchased approximately \$5,700 in counterfeit bills from an individual unknown to the grand jury.

2. Defendants MALIK BURTON, KYLE GUMBS and RAYVAUGHAN WHITE together drove to the Chipotle restaurant located in the 3500 block of Horizon Boulevard in

Bensalem Township, Pennsylvania where defendant BURTON purchased food with a \$100 counterfeit note.

3. Defendants MALIK BURTON, KYLE GUMBS and RAYVAUGHAN WHITE together drove to the Chik-fil-A restaurant located in the 3600 block of Horizon Boulevard in Bensalem Township, Pennsylvania where defendant BURTON purchased food with a \$100 counterfeit note.

4. Defendants MALIK BURTON, KYLE GUMBS and RAYVAUGHAN WHITE together drove to the Neshaminy Mall in Bensalem Township, Pennsylvania.

5. Defendant RAYVAUGHAN WHITE entered the Macy's Department Store in the Neshaminy Mall and purchased merchandise with two \$100 counterfeit notes.

6. Defendant MALIK BURTON purchased food at Auntie Anne's in the Neshaminy Mall with one \$100 counterfeit note.

7. Defendant's MALIK BURTON and KYLE GUMBS attempted to purchase food at the Rita's Water Ice stand in the Neshaminy Mall with one \$100 counterfeit note.

8. Defendant KYLE GUMBS purchased merchandise at Zumiez in the Neshaminy Mall with two \$100 counterfeit notes.

9. Defendants MALIK BURTON and KYLE GUMBS purchased merchandise at Hollister in the Neshaminy Mall with three \$100 counterfeit notes.

All in violation of Title 18, United States Code, Section 371.

**COUNT TWO**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about November 15, 2012, in Bensalem Township, in the Eastern District of Pennsylvania, defendants

**MALIK BURTON,  
KYLE GUMBS, and  
RAYVAUGHAN WHITE**

with intent to defraud, possessed, concealed, passed, and attempted to pass, and aided and abetted the possession, concealment, and attempting to pass of, falsely made, forged, and counterfeited obligations of the United States, that is, approximately \$5,700 in counterfeit \$100 Federal Reserve Notes.

In violation of Title 18, United States Code, Sections 472 and 2.

**NOTICE OF FORFEITURE**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. As a result of the violations of Title 18, United States Code, Sections 371 and 472 set forth in this indictment, defendants

**MALIK BURTON,  
KYLE GUMBS, and  
RAYVAUGHAN WHITE**

shall forfeit to the United States of America all property, real and personal, constituting or derived from proceeds traceable to the violations charged in Count One of this indictment.

3. If any of the property subject to forfeiture, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the 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 intent of the United States, pursuant to Title 18, United States Code, Section 982(b), and Title 28, United States Code, Section 2461 incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other

property of the defendants up to the value of the property subject to forfeiture.

All pursuant to Title 18, United States Code, Sections 492, 981, 982, and Title 28,  
United States Code, Section 2461.

**A TRUE BILL:**

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**FOREPERSON**

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**ZANE DAVID MEMEGER  
UNITED STATES ATTORNEY**