IN THE UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	**CRIMINAL NO. 13-061**
v.	:	**Date Filed: December 19, 2013**
DERRICK FLOYD,	:	**VIOLATIONS:**
CYNTHIA NOWICKI,		**18 U.S.C. § 1344 (bank fraud - 5 counts)**
BENJAMIN EASLEY,	:	**18 U.S.C. § 1028A (aggravated identity**
a/k/a "Shaft,"		**theft - 10 counts)**
JONATHAN WEEKS,	:	**18 U.S.C. § 371 (conspiracy -1 count)**
a/k/a "Jersey,"		**18 U.S.C. § 2 (aiding & abetting)**
RODERIC GRADY,	:	**Notices of forfeiture**
MARTINA GRADY		

SUPERSEDING INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

At all times material to the superseding indictment:

1. PNC Bank was a financial institution, the deposits of which were insured by the Federal Deposit Insurance Corporation.

2. TD Bank was a financial institution, the deposits of which were insured by the Federal Deposit Insurance Corporation.

3. From on or about September 28, 2011 to or about October 7, 2011, in the Eastern District of Pennsylvania, defendants

DERRICK FLOYD,
CYNTHIA NOWICKI, and
BENJAMIN EASLEY,
a/k/a "Shaft"

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

THE SCHEME

4. Defendants CYNTHIA NOWICKI, DERRICK FLOYD and BENJAMIN EASLEY, with co-conspirator Shaun Mays, known to the grand jury and charged elsewhere, and others known and unknown to the grand jury, used stolen account information and false identification documents of M.M., an account holder of PNC Bank, to fraudulently obtain money from the PNC Bank account of M.M., and share the proceeds.

5. In furtherance of the scheme, on or about September 28, 2011, defendant DERRICK FLOYD provided defendant BENJAMIN EASLEY and others, known and unknown to the grand jury, with his address and TD Bank checking account number ending in 6568.

6. In furtherance of the scheme, on or about September 30, 2011, at a PNC Bank branch in Philadelphia, Pennsylvania, at the direction of defendant BENJAMIN EASLEY and others known and unknown to the grand jury, Co-Conspirator 1, unknown to the grand jury, presented the PNC Bank account number of M.M. and fraudulent identification in the name of M.M., and fraudulently withdrew approximately $7,180 from the PNC Bank account of M.M.

7. In furtherance of the scheme, on or about October 4, 2011, at a PNC Bank branch in Flourtown, Pennsylvania, at the direction of defendant BENJAMIN EASLEY and others known and unknown to the grand jury, defendant CYNTHIA NOWICKI, with the name and TD Bank account number of defendant DERRICK FLOYD provided by defendant EASLEY and others known and unknown to the grand jury, presented the PNC Bank account number of M.M. and fraudulent identification in the name of M.M., and fraudulently made a wire transfer of

approximately $60,000 to the TD Bank account ending in 6568 of defendant DERRICK FLOYD.

8. In furtherance of the scheme, on or about October 5, 2011, at a PNC Bank branch in Philadelphia, Pennsylvania, at the direction of defendant BENJAMIN EASLEY and others known and unknown to the grand jury, defendant CYNTHIA NOWICKI presented the PNC Bank account number of M.M. and fraudulent identification in the name of M.M., and fraudulently withdrew approximately $3,000 from the PNC Bank account of M.M.

9. In furtherance of the scheme, on or about October 4, 2011, after the wire transfer from the PNC Bank account of M.M. had been completed, at the direction of defendant BENJAMIN EASLEY and others known and unknown to the grand jury, defendant DERRICK FLOYD made the following fraudulent withdrawals from his TD Bank account ending in 6568 at TD Bank branches in Philadelphia, Pennsylvania:

a. a withdrawal in the amount of approximately $9,000 at a TD Bank branch at 15th and John F. Kennedy Boulevard; and

b. a withdrawal in the amount of approximately $9,000 at a TD Bank branch at 200 Lombard Street.

10. In furtherance of the scheme, on or about October 5, 2011, defendant DERRICK FLOYD made the following fraudulent withdrawals from his TD Bank account ending in 6568 at TD Bank branches in Philadelphia, Pennsylvania:

a. a withdrawal in the amount of approximately $1,500 at a TD Bank branch at 1032 Chestnut Street; and

b. a withdrawal in the amount of approximately $9,000 at a TD Bank branch at 121 South Broad Street.

11. In furtherance of the scheme, on or about October 5, 2011, at a TD Bank

branch located at 2200 Garrett Road in Drexel Hill, Pennsylvania, at the direction of defendant BENJAMIN EASLEY and others unknown to the grand jury, J.B., known to the grand jury, cashed a fraudulent check in the amount of approximately $9,600, that was drawn on the TD Bank account of defendant DERRICK FLOYD ending in 6568 and made payable to J.B.

12. In furtherance of the scheme, on or about October 5, 2011, at a TD Bank branch located at 2200 Garrett Road in Drexel Hill, Pennsylvania, at the direction of defendant BENJAMIN EASLEY and others unknown to the grand jury, D.H., known to the grand jury, cashed a fraudulent check in the amount of approximately $9,800, that was drawn on the TD Bank account of defendant DERRICK FLOYD ending in 6568 and made payable to D.H.

13. In furtherance of the scheme, from on or about October 4, 2011 to on or about October 7, 2011, at the direction of defendant BENJAMIN EASLEY and others known and unknown to the grand jury, fraudulent ATM withdrawals and a fraudulent debit card purchase, totaling approximately $7,080, were made from the TD Bank account of defendant DERRICK FLOYD ending in 6568.

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

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 4, 2011, in the Eastern District of Pennsylvania, defendants

CYNTHIA NOWICKI and
BENJAMIN EASLEY,
a/k/a "Shaft"

knowingly and without lawful authority, used, and aided and abetted the possession and use of, a means of identification of another person, that is, the name and personal identifying information of M.M., during and in relation to bank fraud.

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

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

1. The following banks were financial institutions, the deposits of which were insured by the Federal Deposit Insurance Corporation ("FDIC") at all relevant times:

   a. PNC Bank;

   b. Wells Fargo Bank;

   c. TD Bank;

   d. Fulton Bank; and

   e. Republic Bank.

2. From on or about November 2, 2009 through on or about December 5, 2011, in the Eastern District of Pennsylvania, defendants

DERRICK FLOYD,
CYNTHIA NOWICKI,
BENJAMIN EASLEY,
a/k/a "Shaft,"
JONATHAN WEEKS,
a/k/a "Jersey,"
RODERIC GRADY and
MARTINA GRADY

conspired and agreed, with others known and unknown to the grand jury, to commit offenses against the United States, that is, to knowingly execute and attempt to execute a scheme to defraud multiple banks, including PNC Bank, Wells Fargo Bank, Citizens Bank, TD Bank, Fulton Bank and Republic Bank, in violation of Title 18, United States Code, Section 1344, and to knowingly and without lawful authority use a means of identification of other persons, during and in relation to bank fraud, in violation of Title 18, United States Code, Section 1028A(a)(1), (c)(5).

MANNER AND MEANS

3. It was part of the conspiracy that defendant BENJAMIN EASLEY, a/k/a "Shaft," co-conspirator Shaun Mays, known to the grand jury and charged elsewhere, and others known and unknown to the grand jury directed individuals known as "check runners" to use the names, bank account numbers, driver's license numbers and other means of identification of customers of banks, including PNC Bank, Wells Fargo Bank and TD Bank, and to enrich themselves and defraud these banks by posing as customers of the banks at the teller windows and conducting fraudulent transactions against the customers' accounts.

It was further a part of the conspiracy that:

4. Defendant BENJAMIN EASLEY and others known and unknown to the grand jury directed defendants CYNTHIA NOWICKI, JONATHAN WEEKS, a/k/a "Jersey," and MARTINA GRADY, co-conspirators Laddis Taylor and Norman Ross, known to the grand jury and charged elsewhere, and others unknown to the grand jury, to pose as bank customers to make fraudulent transfers and withdrawals and fraudulent wire transfers from the bank accounts of those customers. In that capacity, defendants NOWICKI, WEEKS and MARTINA GRADY, co-conspirators Taylor and Ross, and others performed some or all of the following:

a. they received, from defendant BENJAMIN EASLEY and others known and unknown to the grand jury personal identifying information for customers of banks, including PNC Bank, Wells Fargo Bank and TD Bank, and, including the bank customers' names, dates of birth, social security numbers, driver's license numbers, and bank account numbers;

b. they received, from defendant BENJAMIN EASLEY and others known and unknown to the grand jury, in addition to the bank customers' account information, false photographic identification in the name of each customer;

c. they were instructed by defendant BENJAMIN EASLEY and others known and unknown to the grand jury to make fraudulent withdrawals and fraudulent transfers from the bank accounts of victims, including customers of PNC Bank, Wells Fargo Bank and TD Bank;

d. they were provided, by defendant BENJAMIN EASLEY and others known and unknown to the grand jury transportation to and from the banks to make fraudulent withdrawals and fraudulent transfers from the bank customers' bank accounts;

e. they gave the proceeds received from the fraudulent transactions to defendant BENJAMIN EASLEY and others known and unknown to the grand jury; and

f. they were paid for their services by defendant BENJAMIN EASLEY and others known and unknown to the grand jury for conducting the fraudulent transactions.

5. Defendant BENJAMIN EASLEY, and others known and unknown to the grand jury, directed defendants DERRICK FLOYD and RODERIC GRADY and D.S., R.F. and S.E., all known to the grand jury, to provide account numbers for bank accounts opened by them for the purpose of accepting fraudulent wire transfers and deposits of money from the bank accounts of others.

6. Defendant BENJAMIN EASLEY and others known and unknown to the grand jury directed defendant JONATHAN WEEKS and co-conspirator Norman Ross and others unknown to the grand jury to fraudulently open bank accounts in the names of other persons for the purpose of depositing fraudulent checks into, accepting fraudulent transfers of money into, or obtaining loans against, those newly-opened accounts.

7. At the direction of defendant BENJAMIN EASLEY and others known and unknown to the grand jury, defendants DERRICK FLOYD, CYNTHIA NOWICKI, JONATHAN WEEKS, RODERIC GRADY and MARTINA GRADY and co-conspirators Shaun Mays, Laddis Taylor and Norman Ross, and others known and unknown to the grand jury, fraudulently obtained and attempted to obtain, and aided and abetted the obtaining of, more than $400,000 from the making of fraudulent withdrawals and fraudulent wire transfers from the bank accounts of victims, the acceptance of fraudulent wire transfers into bank accounts opened in their names, and the deposit of fraudulent checks and acceptance of fraudulent wire transfers into bank accounts opened in the names of other persons.

OVERT ACTS

In furtherance of the conspiracy, defendant BENJAMIN EASLEY and others known and unknown to the grand jury committed the following overt acts in the Eastern District of Pennsylvania and elsewhere:

Fraudulent transactions against PNC Bank account of M.M.

1. On or about September 30, 2011, at the direction of defendant BENJAMIN EASLEY and others known and unknown to the grand jury, Co-Conspirator 1, unknown to the grand jury, pretending to be PNC Bank customer M.M., conducted the following fraudulent transaction against the PNC Bank account of M.M:

DATE	LOCATION	ACCOUNT HOLDER	TOTAL AMOUNT OF FRAUD
09/30/11	Lansdowne, PA	M.M.	$7,180 loss

2. On or about September 28, 2011, defendant DERRICK FLOYD provided defendant BENJAMIN EASLEY and others known and unknown to the grand jury, with the number of his TD Bank checking account, a number ending in 6568.

3. On or about October 4, 2011, at the direction of defendant BENJAMIN EASLEY, co-conspirator Shaun Mays, and others known and unknown to the grand jury, defendant CYNTHIA NOWICKI, pretending to be PNC Bank customer M.M., made a fraudulent wire transfer in the amount of approximately $60,000 from M.M.'s account to the TD Bank account of defendant DERRICK FLOYD.

4. From on or about October 4, 2011 to on or about October 6, 2011, at the direction of defendant BENJAMIN EASLEY and others known and unknown to the grand jury, defendant DERRICK FLOYD and others known and unknown to the grand jury made fraudulent withdrawals, totaling approximately $54,980, were made, via cash withdrawals, ATM withdrawals, cashed checks and a debit card purchase, from the TD Bank account of defendant FLOYD.

5. On or about October 5, 2011, at the direction of defendant BENJAMIN EASLEY, co-conspirator Shaun Mays, and others known and unknown to the United States Attorney, defendant CYNTHIA NOWICKI, pretending to be PNC Bank customer M.M., conducted the following fraudulent transaction against the PNC Bank account of M.M:

DATE	LOCATION	ACCOUNT HOLDER	TOTAL AMOUNT OF FRAUD
10/05/11	Philadelphia, PA	M.M.	$3,000 loss

6. On or about October 24, 2011, a fraud investigator from TD Bank spoke to defendant DERRICK FLOYD on the telephone about the unauthorized wire transfer from the PNC Bank account of M.M. and defendant FLOYD stated that he had received the wire from "Melissa" for property that she was purchasing from him.

Fraudulent transactions using accounts of R.F. and CYNTHIA NOWICKI

7. On or about August 22, 2011, defendant BENJAMIN EASLEY obtained from R.F., and others known and unknown to the grand jury, the account number, PIN and checks for accounts of R.F. with Fulton Bank and The Bank and deposited a fraudulent check in the amount of approximately $4,800, via an ATM in Cherry Hill, New Jersey, into the Fulton Bank account of R.F.

8. On or about August 23 and on or about August 25, 2011, before Fulton Bank learned that the check deposited into R.F.'s account on or about August 22, 2011 was fraudulent, R.F. withdrew approximately $2,270 from her Fulton Bank account at the direction of others known and unknown to the grand jury and unknown individuals withdrew approximately $1,090 from the Fulton Bank account of R.F.

9. Between on or about September 8, 2011 and on or about September 10, 2011, defendant CYNTHIA NOWICKI received, from defendant BENJAMIN EASLEY and others known and unknown to the grand jury, two fraudulent checks, made payable to her and drawn on R.F.'s The Bank account, and defendant NOWICKI, at the direction of defendant

EASLEY and others known and unknown to the grand jury, deposited those fraudulent checks, totaling approximately $9,000, into her Wells Fargo Bank account and then withdrew approximately $9,000 from that account before Wells Fargo learned that the two checks deposited on or about September 8, 2011 were fraudulent.

FRAUDULENT TRANSACTIONS AND WIRE TRANSFERS AGAINST WELLS FARGO CUSTOMER ACCOUNTS

Fraudulent transactions against account of L.B.

10. On or about September 21, 2011, using bank account and personal information of L.B. provided by defendant BENJAMIN EASLEY to co-conspirator Shaun Mays, and at the direction of defendant EASLEY and others known and unknown to the grand jury, Co-Conspirator 2, unknown to the grand jury, pretending to be Wells Fargo customer L.B., conducted the following fraudulent transaction against the Wells Fargo Bank account of L.B.:

DATE	LOCATION	ACCOUNT HOLDER	TOTAL AMOUNT OF FRAUD
09/21/11	Wayne, PA	L.B.	$4,200 loss

11. On or about September 22, 2011, at the direction of defendant BENJAMIN EASLEYand others known and unknown to the grand jury, Co-Conspirator 2, pretending to be Wells Fargo customer LB., made a fraudulent wire transfer in the amount of approximately $18,500 from the Wells Fargo Bank account of L.B. to the Wells Fargo Bank account of D.S. at a Wells Fargo Bank branch in Boothwyn, Pennsylvania.

12 From on or about September 22, 2011 to on or about September 27, 2011, fraudulent withdrawals, totaling approximately $18,512, were made via cash withdrawals, ATM withdrawals, and debit card purchases from the Wells Fargo Bank account of D.S. by D.S. and others unknown to the grand jury.

Fraudulent transaction against account of A.K.

13. On or about September 24, 2011, using bank account and personal information of A.K. provided by defendant BENJAMIN EASLEY to co-conspirator Shaun Mays, co-conspirator Laddis Taylor, pretending to be Wells Fargo customer A.K., conducted the following fraudulent transaction against Wells Fargo Bank account of A.K.:

DATE	LOCATION	ACCOUNT HOLDER	TOTAL AMOUNT OF FRAUD
09/24/11	Trevose, PA	A.K.	$6,000 loss

Fraudulent transactions against account of J.S.

14. On or about October 1, 2011, using bank account and personal information of J.S. provided by defendant BENJAMIN EASLEY to co-conspirator Shaun Mays, co-conspirator Laddis Taylor, pretending to be Wells Fargo Bank customer J.S., conducted the following fraudulent transactions against the Wells Fargo Bank account of J.S:

DATES	LOCATIONS	ACCOUNT HOLDER	TOTAL AMOUNT OF FRAUD
10/01/11	Hainesport, NJ Cherry Hill, NJ	J.S.	$7,700 loss

Fraudulent transactions using accounts in name of M.C.

15. On or about October 3, 2011, using bank account and personal information of M.C. provided by defendant BENJAMIN EASLEY to co-conspirator Shaun Mays, co-conspirator Laddis Taylor, pretending to be Wells Fargo Bank customer M.C., conducted the following fraudulent transactions against the Wells Fargo Bank account of M.C:

DATES	LOCATIONS	ACCOUNT HOLDER	TOTAL AMOUNT OF FRAUD
10/03/11	Cinnaminson, NJ Delran, NJ	M.C.	$8,200 loss

16. On or about October 3, 2011, an individual unknown to the grand jury, using identification information for M.C., fraudulently opened a TD Bank account in the name of M.C.

17. On or about October 7, 2011, at the direction of defendant BENJAMIN EASLEY and others known and unknown to the grand jury, co-conspirator Norman Ross deposited a fraudulent check, in the amount of $1,895.25 into the TD Bank account opened in the name of M.C.

18. From on or about October 4, 2011 to on or about October 7, 2011, Norman Ross, using the debit card for the M.C. fraudulent account, made fraudulent withdrawals and purchases, totaling approximately $125.00.

19. On or about October 10, 2011, at the direction of defendant BENJAMIN EASLEY and others known and unknown to the grand jury, Norman Ross, using fraudulent identification in the name of M.C., fraudulently opened a checking account in the name of M.C. at a Republic Bank branch in Philadelphia, Pennsylvania, with a deposit of a fraudulent check payable

to M.C. in the amount of $1,895.25, and applied for an unsecured loan in the name of M.C. in the amount of approximately $1,000.

Fraudulent transactions against account of L.W.

20. On or about October 4, 2011, using bank account and personal information of L.W. provided by defendant BENJAMIN EASLEY to co-conspirator Shaun Mays, and at the direction of defendant EASLEY and others known and unknown to the grand jury, Co-Conspirator 3, unknown to the grand jury, pretending to be Wells Fargo customer L.W., conducting the following fraudulent transaction from the Wells Fargo Bank account of L.W.:

DATE	LOCATION	ACCOUNT HOLDER	TOTAL AMOUNT OF FRAUD
10/04/11	North Bergen, NJ	L.W.	$4,500 loss

21. On or about October 6, 2011, at the direction of defendant BENAJMIN EASLEY and others known and unknown to the grand jury, defendant CYNTHIA NOWICKI, pretending to be Wells Fargo customer L.W., attempted to make a fraudulent wire transfer in the amount of approximately $30,000 from the Wells Fargo Bank account of L.W. to the TD Bank account of S.E. at a Wells Fargo Bank branch at the Roosevelt Mall in Philadelphia, Pennsylvania.

Fraudulent transactions using accounts in name of C.S.

22. On or about October 13, 2011, using personal information of C.S. provided by defendant BENJAMIN EASLEY to co-conspirator Shaun Mays, and at the direction of defendant EASLEY, Shaun Mays and others known and unknown to the grand jury, defendant JONATHAN WEEKS, using identification information for Wells Fargo Bank customer C.S., fraudulently opened a TD Bank account in the name of C.S.

23. On or about October 14, 2011, using bank account and personal information of C.S. provided by defendant BENJAMIN EASLEY to co-conspirator Shaun Mays, and at the direction of defendant EASLEY and others known and unknown to the grand jury, defendant JONATHAN WEEKS, pretending to be C.S, attempted to make two fraudulent wire transfers at a Wells Fargo Bank branch in Malvern, Pennsylvania, one wire transfer in the amount of approximately $47,000 from the Wells Fargo Bank account of C.S. to a First National Bank account opened in the name of K.S., and one wire transfer in the amount of approximately $25,000 to the TD Bank account fraudulently opened in the name of C.S.

Fraudulent transaction against account of P.O.

24. On or about October 17, 2011, using bank account and personal information of P.O. provided by defendant BENJAMIN EASLEY to co-conspirator Shaun Mays, and at the direction of co-conspirator Mays and others known and unknown to the grand jury, co-conspirator Laddis Taylor, pretending to be Wells Fargo customer P.O., conducted the following fraudulent transaction against the Wells Fargo Bank account of P.O.:

DATE	LOCATION	ACCOUNT HOLDER	TOTAL AMOUNT OF FRAUD
10/17/11	West Chester, PA	P.O.	$3,000 loss

Fraudulent transactions against account of J.M.

25. On or about October 17, 2011 and on or about October 18, 2011, using bank account and personal information of J.M. provided by defendant BENJAMIN EASLEY to co-conspirator Shaun Mays, at the direction of co-conspirator Mays and others known and unknown to the grand jury, co-conspirator Laddis Taylor, pretending to be Wells Fargo customer J.M., made the following fraudulent withdrawals from the Wells Fargo Bank account of J.M.:

DATES	LOCATIONS	ACCOUNT HOLDER	TOTAL AMOUNT OF FRAUD
10/17/11 to 10/18/11	Thorndale, PA East Norriton, PA	J.M.	$8,000 loss

Fraudulent transactions against account of M.N.

26. On or about October 28, 2011, using bank account and personal information of M.N. provided by defendant BENJAMIN EASLEY to co-conspirator Shaun Mays, and at the direction of defendant EASLEY and others known and unknown to the grand jury, co-conspirator Laddis Taylor, pretending to be Wells Fargo customer M.N., made a fraudulent wire transfer in the amount of approximately $80,000 from the Wells Fargo Bank account of M.N. to a Wilmington Trust Bank account, ending in 8654 and opened in the name of defendant RODERIC GRADY, at a Wells Fargo Bank branch in Parkville, Maryland.

27. On or about October 28, 2011, at the direction of defendant BENJAMIN EASLEY and others known and unknown to the grand jury, co-conspirator Laddis Taylor, pretending to be Wells Fargo customer M.N., made and attempted to make the following fraudulent withdrawals from the Wells Fargo Bank account of M.N. at Wells Fargo Bank branches in Newark, Delaware:

DATE	LOCATION	ACCOUNT HOLDER	TOTAL AMOUNT OF FRAUD
10/28/11	3 branches in Newark, DE	M.N	$11,000 loss

Fraudulent transaction against account of N.W.

28. On or about November 9, 2011, using bank account and personal information of N.W. provided by defendant BENJAMIN EASLEY to co-conspirator Shaun Mays, at the direction of others known and unknown to the grand jury, Co-Conspirator 4, pretending to be Wells Fargo customer N.W., conducted the following fraudulent transaction against the Wells Fargo Bank account of N.W.:

DATE	LOCATION	ACCOUNT HOLDER	TOTAL AMOUNT OF FRAUD
11/09/11	Hawthorne, NJ	N.W.	$4,500 loss

Fraudulent transaction against account of J.P.

29. On or about November 9, 2011, defendant RODERIC GRADY opened a Wells Fargo Bank account in the names of defendants RODERIC GRADY and MARTINA GRADY.

30. On or about December 14, 2011, at the direction of defendant BENJAMIN EASLEY and others known and unknown to the grand jury, at a Wells Fargo Bank branch in Thorndale, Pennsylvania, defendant MARTINA GRADY, pretending to be J.P. and accompanied by defendant RODERIC GRADY, made a fraudulent withdrawal in the amount of approximately $10,000 and, with the funds from that fraudulent withdrawal, purchased a cashier's check payable to defendant RODERIC GRADY in the amount of $10,000.

31. On or about December 15, 2011, at the direction of defendant BENJAMIN EASLEY and others known and unknown to the grand jury, at a Wells Fargo Bank branch in New Castle, Delaware, defendant RODERIC GRADY cashed that $10,000 cashier's check payable to himself.

FRAUDULENT TRANSACTIONS AGAINST TD BANK CUSTOMER ACCOUNT

Fraudulent transactions using identity of B.G.

32. On or about November 28, 2011, with personal and bank account information of B.G. provided by defendant BENJAMIN EASLEY and others unknown to the grand jury, and at the direction of defendant EASLEY and others known and unknown to the grand jury, co-conspirator Norman Ross, using fraudulent identification in the name of B.G., fraudulently withdrew approximately $7,000 from a legitimate TD Bank account, ending in 4464, of B.G.

DATE	LOCATION	ACCOUNT HOLDER	TOTAL AMOUNT OF FRAUD
11/28/11	Philadelphia, PA	B.G.	$7,000 loss

33. On or about November 28, 2011, at the direction of defendant BENJAMIN EASLEY and others known and unknown to the grand jury, co-conspirator Norman Ross, using fraudulent identification in the name of B.G.:

a. fraudulently opened a checking account, ending in 4636 (the B.G. fraudulent checking account), and a savings account ending in 8235, at a TD Bank branch ("the B.G. fraudulent savings account") in Philadelphia, Pennsylvania;

b. deposited a fraudulent check payable to B.G., in the amount of approximately $1,900, into the B.G. fraudulent checking account;

c. fraudulently withdrew approximately $10,000 from a legitimate TD Bank account, ending in 4472, of B.G. and deposited those funds into the B.G. fraudulent savings account; and

d. fraudulently withdrew approximately $2,000 from B.G.'s legitimate TD Bank account, ending in 4472, and fraudulently transferred approximately $13,000 from B.G.'s legitimate TD Bank account ending in 4472 into the B.G. fraudulent savings account.

34. From on or about November 28, 2011 through on or about December 5, 2011, co-conspirator Norman Ross, using the debit card for the B.G. fraudulent checking account and the B.G. fraudulent savings account, made fraudulent withdrawals and purchases, totaling approximately $16,775.78.

35. On or about December 1, 2011, at a TD Bank branch in Philadelphia, Pennsylvania, at the direction of defendant BENJAMIN EASLEY and others known and unknown to the grand jury, co-conspirator Norman Ross, using fraudulent identification in the name of B.G., fraudulently withdrew approximately $8,000 from B.G.'s legitimate TD Bank account, ending in 4472, and fraudulently transferred approximately $15,000 from B.G.'s legitimate TD Bank account ending in 4472 into the B.G. fraudulent savings account.

FRAUDULENT TRANSACTION AGAINST REPUBLIC BANK

Fraudulent transactions using identity of M.P.

36. On or about December 5, 2011, with personal and bank account information for M.P. provided by defendant BENJAMIN EASLEY, and at the direction of defendant EASLEY and others unknown to the grand jury, co-conspirator Norman Ross, using fraudulent identification in the name of M.P., fraudulently opened checking account and savings accounts in the name of M.P. at a Republic Bank branch in Philadelphia, Pennsylvania, with deposits of approximately $400.00 in cash, and applied for an unsecured loan in the amount of approximately $5,000 in the name of M.P.

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

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 and 3 through 7 and Overt Acts 10 through 15, and 20, 21 and 23 through 32 of Count Three are incorporated here.

2. From on or about September 6, 2011 to or about November 28, 2011, in the Eastern District of Pennsylvania and elsewhere, defendants

CYNTHIA NOWICKI,
BENJAMIN EASLEY,
a/k/a "Shaft,"
JONATHAN WEEKS,
a/k/a "Jersey,"
RODERIC GRADY, and
MARTINA GRADY

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

THE SCHEME

3. Defendants BENJAMIN EASLEY, a/k/a "Shaft," CYNTHIA NOWICKI, JONATHAN WEEKS, a/k/a "Jersey," RODERIC GRADY and MARTINA GRADY, and co-conspirators known and unknown to the grand jury, including Shaun Mays, Laddis Taylor and Norman Ross, all known to the grand jury and charged elsewhere, used stolen account information and false identification documents of account holders of Wells Fargo Bank, to fraudulently obtain money, totaling approximately $277,970, from the Wells Fargo Bank accounts of those account holders and share the proceeds.

Fraudulent transactions against account of L.B.

4. On or about September 21, 2011, with personal and bank account information provided by defendant BENJAMIN EASLEY, and at the direction of defendant EASLEY, co-conspirator Shaun Mays and others known and unknown to the grand jury, Co-Conspirator 2, unknown to the grand jury, pretending to be Wells Fargo customer L.B., made a fraudulent withdrawal in the amount of approximately $4,200 from the Wells Fargo Bank account of L.B. at a Wells Fargo Bank branch in Wayne, Pennsylvania.

5. On or about September 22, 2011, with personal and bank account information provided by defendant BENJAMIN EASLEY, and at the direction of defendant EASLEY, co-conspirator Shaun Mays and others known and unknown to the grand jury, Co-Conspirator 2, pretending to be Wells Fargo customer LB., made a fraudulent wire transfer in the amount of approximately $18,500 from the Wells Fargo Bank account of L.B. to the Wells Fargo Bank account of D.S., known to the grand jury, at a Wells Fargo Bank branch in Boothwyn, Pennsylvania.

Fraudulent transaction against account of A.K.

6. On or about September 24, 2011, with personal and bank account information provided by defendant BENJAMIN EASLEY, and at the direction of defendant EASLEY, co-conspirator Shaun Mays and others known and unknown to the grand jury, co-conspirator Laddis Taylor, pretending to be Wells Fargo customer A.K., made a fraudulent withdrawal in the amount of approximately $6,000 from the Wells Fargo Bank account of A.K. at a Wells Fargo Bank branch in Trevose, Pennsylvania.

Fraudulent transactions against account of J.S.

7. On or about October 1, 2011, with personal and bank account information provided by defendant BENJAMIN EASLEY, and at the direction of defendant EASLEY, co-conspirator Shaun Mays and others known and unknown to the grand jury, co-conspirator Laddis Taylor, pretending to be Wells Fargo Bank customer J.S., conducted the following fraudulent transactions against the Wells Fargo Bank account of J.S:

DATES	LOCATIONS	ACCOUNT HOLDER	AMOUNT OF FRAUD LOSS
10/01/11	Hainesport, NJ	J.S.	$4,000
10/01/11	Cherry Hill, NJ	J.S.	$3,600

Fraudulent transactions using accounts in name of M.C.

8. On or about October 3, 2011, with personal and bank account information provided by defendant BENJAMIN EASLEY, and at the direction of defendant EASLEY, co-conspirator Shaun Mays and others known and unknown to the grand jury, co-conspirator Laddis Taylor, pretending to be Wells Fargo Bank customer M.C., conducted the following fraudulent transactions against the Wells Fargo Bank account of M.C:

DATES	LOCATIONS	ACCOUNT HOLDER	AMOUNT OF FRAUD LOSS
10/03/11	Cinnaminson, NJ	M.C.	$3,600
10/03/11	Delran, NJ	M.C.	$4,000

Fraudulent transactions against account of L.W.

9. On or about October 4, 2011, with personal and bank account information provided by defendant BENJAMIN EASLEY, and at the direction of defendant EASLEY, co-conspirator Shaun Mays and others known and unknown to the grand jury, Co-Conspirator 3, unknown to the grand jury, pretending to be Wells Fargo customer L.W., made a fraudulent withdrawal in the amount of approximately $4,500 from the Wells Fargo Bank account of L.W. at a Wells Fargo Bank branch in North Bergen, New Jersey.

10. On or about October 6, 2011, with personal and bank account information provided by defendant BENJAMIN EASLEY, and at the direction of defendant EASLEY, co-conspirator Shaun Mays and others known and unknown to the grand jury, defendant CYNTHIA NOWICKI, pretending to be Wells Fargo customer L.W., attempted to make a fraudulent wire transfer in the amount of approximately $30,000 from the Wells Fargo Bank account of L.W. to the TD Bank account of S.E., known to the grand jury, at a Wells Fargo Bank branch in Boothwyn, Pennsylvania.

Fraudulent transactions using accounts in name of C.S.

11. On or about October 14, 2011, with personal and bank account information provided by defendant BENJAMIN EASLEY, and at the direction of defendant EASLEY, co-conspirator Shaun Mays and others known and unknown to the grand jury, defendant JONATHAN WEEKS, pretending to be C.S, attempted to make two fraudulent wire transfers at a Wells Fargo Bank branch in Malvern, Pennsylvania, one attempted transfer in the amount of approximately $47,000 from the Wells Fargo Bank account of C.S. to a First National Bank account opened in the name of K.S., and one attempted transfer in the amount of approximately $25,000 to a TD Bank account fraudulently opened in the name of C.S.

Fraudulent transaction against account of P.O.

12. On or about October 17, 2011, with personal and bank account information provided by defendant BENJAMIN EASLEY, and at the direction of defendant EASLEY, co-conspirator Shaun Mays and others known and unknown to the grand jury, co-conspirator Laddis Taylor, pretending to be Wells Fargo customer P.O., made a fraudulent withdrawal in the amount of approximately $3,000 from the Wells Fargo Bank account of P.O. at a Wells Fargo Bank branch in West Chester, Pennsylvania.

Fraudulent transactions against account of J.M.

13. On or about October 17, 2011 and on or about October 18, 2011, with personal and bank account information provided by defendant BENJAMIN EASLEY, and at the direction of defendant EASLEY, co-conspirator Shaun Mays and others known and unknown to the grand jury, co-conspirator Laddis Taylor, pretending to be Wells Fargo customer J.M., made the following fraudulent withdrawals from the Wells Fargo Bank account of J.M.:

DATES	LOCATIONS	ACCOUNT HOLDER	AMOUNT OF FRAUD LOSS
10/17/11	Thorndale, PA	J.M.	$4,000
10/18/11	East Norriton, PA	J.M.	$4,000

Fraudulent transaction against account of N.W.

14. On or about November 9, 2011, with personal and bank account information provided by defendant BENJAMIN EASLEY, and at the direction of defendant EASLEY, co-conspirator Shaun Mays and others known and unknown to the grand jury, Co-Conspirator 4, unknown to the grand jury, pretending to be Wells Fargo customer N.W., made a fraudulent

withdrawal in the amount of approximately $4,500 from the Wells Fargo Bank account of N.W. at a Wells Fargo Bank branch in Hawthorne, New Jersey.

Fraudulent transaction against account of J.P.

15. On or about November 9, 2011, defendant RODERIC GRADY opened a Wells Fargo Bank account in the names of defendants RODERIC GRADY AND MARTINA GRADY.

16. On or about December 14, 2011, with personal and bank account information provided by defendant BENJAMIN EASLEY, and at the direction of defendant EASLEY and others known and unknown to the grand jury, defendant MARTINA GRADY, pretending to be J.P. and accompanied by defendant RODERIC GRADY, made a fraudulent withdrawal in the amount of approximately $10,000 and, with the funds from that fraudulent withdrawal, purchased a cashier's check payable to defendant RODERIC GRADY in the amount of at a Wells Fargo Bank branch in Thorndale, Pennsylvania.

17. On or about December 15, 2011, at the direction of defendant BENJAMIN EASLEY and others known and unknown to the grand jury, defendant RODERIC GRADY cashed that $10,000 cashier's check payable to himself at a Wells Fargo Bank branch in New Castle, Delaware.

Fraudulent transactions against account of M.N.

18. On or about November 28, 2011, with personal and bank account information provided by defendant BENJAMIN EASLEY, and at the direction of defendant EASLEY, co-conspirator Shaun Mays and others known and unknown to the grand jury, at a Wells Fargo Bank branch in Parkville, Maryland, co-conspirator Laddis Taylor, pretending to be Wells Fargo customer M.N., made a fraudulent wire transfer in the amount of approximately $80,000

from the Wells Fargo Bank account of M.N. to a Wilmington Trust Bank account, ending in 8654, opened in the name of defendant RODERIC GRADY.

19. On or about November 28, 2011, with personal and bank account information provided by defendant BENJAMIN EASLEY, and at the direction of defendant EASLEY, co-conspirator Shaun Mays and others known and unknown to the grand jury, co-conspirator Laddis Taylor, pretending to be Wells Fargo customer M.N., made the following fraudulent withdrawals from the Wells Fargo Bank account of M.N. at Wells Fargo Bank branches in Newark, Delaware:

DATES	LOCATION	ACCOUNT HOLDER	AMOUNT OF FRAUD LOSS
11/28/11	Newark, DE	M.N	$4,000
11/28/11	Newark, DE	M.N	$3,000 attempt
11/28/11	Newark, DE	M.N	$4,000 loss

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

COUNT FIVE

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 and 3 through 7 and Overt Acts 16 through 18, 22 and 32 through 35 of Count Three are incorporated here.

2. From on or about October 3, 2011 to or about December 1, 2011, in the Eastern District of Pennsylvania and elsewhere, defendant

BENJAMIN EASLEY,
a/k/a "Shaft,"

knowingly executed and 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 that bank by means of false and fraudulent pretenses, representations, and promises.

THE SCHEME

3. Defendant BENJAMIN EASLEY, with co-conspirators Shaun Mays and Norman Ross, known to the grand jury and charged elsewhere, and others known and unknown to the grand jury, used stolen account information and false identification documents of M.C. and B.G. to fraudulently obtain money from TD Bank, totaling approximately $51,795, and share the proceeds.

Fraudulent transactions using identity of M.C.

4. On or about October 3, 2011, an individual unknown to the grand jury, using identification information for M.C., fraudulently opened a TD Bank account in the name of M.C.

5. On or about October 7, 2011, with personal and bank account information provided by defendant BENJAMIN EASLEY, and at the direction of defendant EASLEY, co-conspirator Shaun Mays and others known and unknown to the grand jury, co-conspirator Norman Ross deposited a fraudulent check, in the amount of $1,895.25 into the TD Bank account opened in the name of M.C.

6. From on or about October 4, 2011 to on or about October 7, 2011, Norman Ross, using the debit card for the M.C. fraudulent account, made fraudulent withdrawals and purchases, totaling approximately $125.00.

Fraudulent transactions using identity of B.G.

7. On or about November 28, 2011, with personal and bank account information provided by defendant BENJAMIN EASLEY, and at the direction of defendant EASLEY, co-conspirator Shaun Mays and others known and unknown to the grand jury, co-conspirator Norman Ross, using fraudulent identification in the name of B.G., fraudulently withdrew approximately $7,000 from a legitimate TD Bank account, ending in 4464, of B.G.

8. On or about November 28, 2011, with personal and bank account information provided by defendant BENJAMIN EASLEY, and at the direction of defendant EASLEY, co-conspirator Shaun Mays and others known and unknown to the grand jury, Norman Ross, using fraudulent identification in the name of B.G.:

a. fraudulently opened a checking account, ending in 4636 (the B.G. fraudulent checking account), and a savings account ending in 8235, at a TD Bank branch ("the B.G. fraudulent savings account") in Philadelphia, Pennsylvania;

b. deposited a fraudulent check payable to B.G., in the amount of approximately $1,900, into the B.G. fraudulent checking account;

c. fraudulently withdrew approximately $10,000 from a legitimate TD Bank account, ending in 4472, of B.G. and deposited those funds into the B.G. fraudulent savings account; and

d. fraudulently withdrew approximately $2,000 from B.G.'s legitimate TD Bank account, ending in 4472, and fraudulently transferred approximately $13,000 from B.G.'s legitimate TD Bank account ending in 4472 into the B.G. fraudulent savings account.

9. From on or about November 28, 2011 through on or about December 5, 2011, co-conspirator Norman Ross, using the debit card for the B.G. fraudulent checking account and the B.G. fraudulent savings account, made fraudulent withdrawals and purchases, totaling approximately $16,775.78.

10. On or about December 1, 2011, at a TD Bank branch in Philadelphia, Pennsylvania, with personal and bank account information provided by defendant BENJAMIN EASLEY, and at the direction of defendant EASLEY, co-conspirator Shaun Mays and others known and unknown to the grand jury, co-conspirator Norman Ross, using fraudulent identification in the name of B.G., fraudulently withdrew approximately $8,000 from B.G.'s legitimate TD Bank account, ending in 4472, and fraudulently transferred approximately $15,000 from B.G.'s legitimate TD Bank account ending in 4472 into the B.G. fraudulent savings account.

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

COUNT SIX

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 and 3 through 7 and Overt Acts 19 and 36 of Count Three are incorporated here.

2. From on or about October 10, 2011 to or about December 5, 2011, in the Eastern District of Pennsylvania and elsewhere, defendant

BENJAMIN EASLEY
a/k/a "Shaft,"

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

THE SCHEME

3. Defendant BENJAMIN EASLEY, with co-conspirators Shaun Mays and Norman Ross, known to the grand jury and charged elsewhere, and others known and unknown to the grand jury, used stolen account information and false identification documents of M.C. and M.P. to fraudulently obtain money, totaling approximately $7,895, from Republic Bank and share the proceeds.

Fraudulent transactions using identity of M.C.

4. On or about October 10, 2011, with personal and bank account information provided by defendant BENJAMIN EASLEY, and at the direction of defendant EASLEY, co-conspirator Shaun Mays and others known and unknown to the grand jury, Norman Ross, using fraudulent identification in the name of M.C., fraudulently opened a checking account in the name of M.C. at a Republic Bank branch in Philadelphia, Pennsylvania, with a deposit of a fraudulent check payable to M.C. in the amount of $1,895.25, and applied for an unsecured loan from Republic Bank in the name of M.C. in the amount of approximately $1,000.

Fraudulent transactions using identity of M.P.

5. On or about December 5, 2011, with personal and bank account information provided by defendant BENJAMIN EASLEY, and at the direction of defendant EASLEY, co-conspirator Shaun Mays and others known and unknown to the grand jury, co-conspirator Norman Ross, using fraudulent identification in the name of M.P., fraudulently opened checking account and savings accounts in the name of M.P. at a Republic Bank branch in Philadelphia, Pennsylvania, with deposits of approximately $400.00 in cash, and applied for an unsecured loan from Republic Bank in the amount of approximately $5,000 in the name of M.P.

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

COUNT SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

At all times material to the superseding indictment:

1. Wachovia Bank was a financial institution, the deposits of which were insured by the Federal Deposit Insurance Corporation.

2. From on or about November 2, 2009 to or about November 9, 2009, in the Eastern District of Pennsylvania and elsewhere, defendant

BENJAMIN EASLEY
a/k/a "Shaft,"

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

THE SCHEME

3. Defendant BENJAMIN EASLEY, with co-conspirator Michael Alexander, known to the grand jury and charged elsewhere, and others known and unknown to the grand jury, used stolen business account information for Intrepidus Group and Laurel Mart and false identification documents of C.A. and A.H. to fraudulently obtain money, totaling approximately $276,500, from Wachovia Bank and share the proceeds.

Fraudulent transactions against Wachovia Bank account of Laurel Mart

4. On or about November 2, 2009, at the Independence Mall East branch of Wachovia Bank in Philadelphia, Pennsylvania, and at the direction of defendant BENJAMIN EASLEY and others known and unknown to the grand jury, co-conspirator Michael Alexander, pretending to be C.A., made a fraudulent wire transfer in the amount of approximately

$67,000 from the Wachovia Bank business account of Laurel Mart, which had been opened by C.A. to an account with BB&T Bank.

5. On or about November 3, 2009, at the Independence Mall East branch of Wachovia Bank in Philadelphia, Pennsylvania, and at the direction of defendant BENJAMIN EASLEY and others known and unknown to the grand jury, co-conspirator Michael Alexander, pretending to be C.A., made a fraudulent withdrawal in the amount of approximately $9,500 from the Wachovia Bank business account of Laurel Mart.

Fraudulent transaction against Wachovia Bank account of Intrepidus Group

6. On or about November 9, 2009, at the branch of Wachovia Bank in Lansdowne, Pennsylvania, and at the direction of defendant BENJAMIN EASLEY and others known and unknown to the grand jury, co-conspirator Michael Alexander, pretending to be A.H., attempted to make a fraudulent wire transfer in the amount of approximately $200,000 from the Wachovia Bank business account of Intrepidus Group to an account in the name of T.N. with Thanachart Bank Public Co. Ltd. in Bangkok, Thailand.

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

COUNTS EIGHT THROUGH FOURTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about the dates listed below, in the Eastern District of Pennsylvania and elsewhere, defendant

BENJAMIN EASLEY
a/k/a "Shaft,"

knowingly and without lawful authority, used, and aided and abetted the possession and use of, a means of identification of another person, that is, the name and personal identifying information of the persons indicated below, each person constituting a separate count, during and in relation to bank fraud and access device fraud:

COUNT	DATE	ACCOUNT HOLDER
8	11/09/09	A.H.
9	10/10/11	M.C.
10	10/17/11	P.O.
11	10/17/11	J.M.
12	10/31/11	J.W.
13	11/28/11	B.G.
14	12/05/11	M.P.

All in violation of Title 18, United States Code, Sections 1028A(a)(1), (c)(4), (c)(5).

COUNT FIFTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 14, 2011, in the Eastern District of Pennsylvania, defendants

BENJAMIN EASLEY,
a/k/a "Shaft," and
JONATHAN WEEKS,
a/k/a "Jersey,"

knowingly and without lawful authority, used, and aided and abetted the possession and use of, a means of identification of another person, that is, the name and personal identifying information of C.S., during and in relation to bank fraud.

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

COUNT SIXTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 14, 2011, in the Eastern District of Pennsylvania, defendants

BENJAMIN EASLEY,
a/k/a "Shaft,"
RODERIC GRADY, and
MARTINA GRADY

knowingly and without lawful authority, used, and aided and abetted the possession and use of, a means of identification of another person, that is, the name and personal identifying information of J.P., 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 #1

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 superseding indictment, defendants

DERRICK FLOYD,
CYNTHIA NOWICKI, and
BENJAMIN EASLEY,
a/k/a "Shaft"

shall forfeit to the United States of America any property, real or personal, that constitutes or is derived from proceeds traceable to the commission of such offenses, as charged in this information, including, but not limited to, the sum of $65,134.

2. 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), 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).

NOTICE OF FORFEITURE #2

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 superseding indictment, defendant

BENJAMIN EASLEY,
a/k/a "Shaft"

shall forfeit to the United States of America any property, real or personal, that constitutes or is derived from proceeds traceable to the commission of such offenses, as charged in this information, including, but not limited to, the sum of $299,544.

2. 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), 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 TRUE BILL:

GRAND JURY FOREPERSON

ZANE DAVID MEMEGER
United States Attorney