

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

UNITED STATES OF AMERICA	:	CRIMINAL NO: <u>14-</u>
v.	:	DATE FILED: <u>September</u> 2014
KYLE JONES	:	VIOLATIONS:
	:	18 U.S.C. § 371 (conspiracy- 1 count)
	:	18 U.S.C. § 1344 (bank fraud- 1 count)
	:	18 U.S.C. § 1028A (aggravated identity theft - 1 count)
	:	18 U.S.C. § 2 (aiding and abetting)

INFORMATION

COUNT ONE

THE UNITED STATES ATTORNEY CHARGES THAT:

At all times material to this indictment:

1. TD Bank was a financial institution, the deposits of which were insured by the Federal Deposit Insurance Corporation (“FDIC”), certificate number 18409.
2. From in or about December 2013, to in or about February 2014, in the Eastern District of Pennsylvania, the District of Delaware, the District of New Jersey, and elsewhere, defendant

KYLE JONES

conspired and agreed, with others known and unknown to the United States Attorney, to commit offenses against the United States, that is, to knowingly execute a scheme to defraud a bank and to obtain funds by false representations, in violation of Title 18, United States Code, Section 1344, and to knowingly and without lawful authority transfer and use a means of identification of another person, that is, another’s name, and driver’s license, during and in relation to a bank fraud, in

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

MANNER AND MEANS

3. It was part of the conspiracy that defendant KYLE JONES, and other co-conspirators known and unknown to the United States Attorney, participated in an illegal check cashing scheme.

It was further a part of the conspiracy that:

4. Defendant KYLE JONES and the co-conspirators stole identifications, checks, bank cards, debit cards, and credit cards from victims who parked at gymnasiums, parks, athletic fields, and other places where the defendant and the co-conspirators believed people, usually women, would leave purses and wallets unattended inside their cars.

5. Defendant KYLE JONES and other co-conspirators recruited other people, mostly women, who could impersonate the victims and cash stolen fraudulent checks at the victim banks using the drive-through teller lanes and presenting stolen identifications.

6. Defendant KYLE JONES and the co-conspirators used rented cars with fake or obscured license plates to present a fraudulent check using the drive-through lane at the victim banks using a victim's stolen driver's license to illegally cash the check.

7. Co-conspirators wrote out the checks and forged victims' signatures, then told defendant KYLE JONES and other co-conspirators which bank to go to, and which forged checks and stolen victim identifications to present at the drive-through window. On many occasions, JONES served as the driver and took another co-conspirator as the passenger to cash a forged check at the drive-through lane of the bank. On some occasions, JONES used identification stolen from a male victim to present a forged check or forged withdrawal slip.

8. Another co-conspirator paid defendant KYLE JONES for his work by

giving him cash equal to a portion of the money obtained by cashing forged checks or making fraudulent cash withdrawals.

9. As a result of the fraudulent use of the stolen checks and identifications, defendant KYLE JONES and his co-conspirators caused over \$120,000 to be paid by the banks as a result of forged checks or forged withdrawal slips.

OVERT ACTS

In furtherance of the conspiracy, defendant KYLE JONES and co-conspirators committed the following overt acts, among others, in the Eastern District of Pennsylvania, the District of Delaware, the District of New Jersey, and elsewhere:

1. On or about December 16, 2013, defendant KYLE JONES drove another co-conspirator to TD Bank, in Newark, Delaware, to cash a check that was stolen from K.O. in Glen Mills, Pennsylvania, that was fraudulently made payable to H.C. for \$2,780, and that was cashed at the bank drive-through lane using H.C.'s stolen Pennsylvania driver's license.

2. On or about December 15, 2013, defendant KYLE JONES drove another co-conspirator to TD Bank, on Route 273, in Delaware, to cash a check that was stolen from L.D. in Collegeville, Pennsylvania, that was fraudulently made payable to J.P. for \$2,480, and that was cashed at the bank drive-through lane using J.P.'s stolen Pennsylvania driver's license.

3. On or about January 20, 2014, defendant KYLE JONES drove another co-conspirator to TD Bank, in Pennsauken, New Jersey, to cash a check that was stolen from A.T. in Jamison, Pennsylvania, that was fraudulently made payable to B.U. \$2,700, and that was cashed at the bank drive-through lane using B.U.'s stolen Pennsylvania driver's license.

4. On or about January 18, 2014, defendant KYLE JONES drove another co-conspirator to TD Bank, in Gloucester City, New Jersey, to cash a check that was stolen from

A.T. in Jamison, Pennsylvania, that was fraudulently made payable to M.M. for \$2,100, and that was cashed at the bank drive-through lane using M.M.'s stolen Pennsylvania driver's license.

5. On or about January 22, 2014, defendant KYLE JONES went to a TD Bank in Southampton, Pennsylvania, and withdrew \$2,000, from the account of E.F. using the Pennsylvania driver's license stolen from E.F. in Aston, Pennsylvania.

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

COUNT TWO

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

1. Paragraph 1 and 3 through 9, and overt acts 1 through 5, are incorporated here.

2. From in or about December 2013, through in or about February 2014, in the Eastern District of Pennsylvania, the District of Delaware, the District of New Jersey, and elsewhere, defendant

KYLE JONES

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. On or about December 16, 2013, defendant KYLE JONES drove another co-conspirator to TD Bank, in Newark, Delaware, to cash a check that was stolen from K.O. in Glen Mills, Pennsylvania, that was fraudulently made payable to H.C. for \$2,780, and that was cashed at the bank drive-through lane using H.C.'s stolen Pennsylvania driver's license.

4. On or about December 15, 2013, defendant KYLE JONES drove another co-conspirator to TD Bank, on Route 273, in Delaware, to cash a check that was stolen from L.D. in Collegeville, Pennsylvania, that was fraudulently made payable to J.P. for \$2,480, and that was cashed at the bank drive-through lane using J.P.'s stolen Pennsylvania driver's license.

5. On or about January 20, 2014, defendant KYLE JONES drove another co-conspirator to TD Bank, in Pennsauken, New Jersey, to cash a check that was stolen from A.T. in Jamison, Pennsylvania, that was fraudulently made payable to B.U. \$2,700, and that was cashed

at the bank drive-through lane using B.U.'s stolen Pennsylvania driver's license.

6. On or about January 18, 2014, defendant KYLE JONES drove another co-conspirator to TD Bank, in Gloucester City, New Jersey, to cash a check that was stolen from A.T. in Jamison, Pennsylvania, that was fraudulently made payable to M.M. for \$2,100, and that was cashed at the bank drive-through lane using M.M.'s stolen Pennsylvania driver's license.

7. On or about January 22, 2014, defendant KYLE JONES went to a TD Bank in Southampton, Pennsylvania, and withdrew \$2,000, from the account of E.F. using the Pennsylvania driver's license stolen from E.F. in Aston, Pennsylvania.

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

COUNT THREE

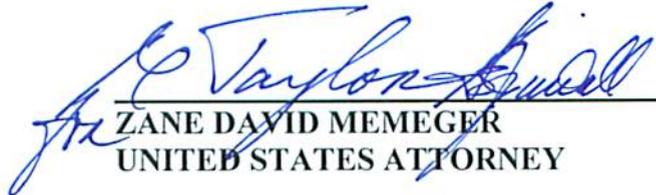
THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

On or about January 22, 2014, in the Eastern District of Pennsylvania, defendant

KYLE JONES

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 driver's license of E.F., during and in relation to bank fraud.

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


ZANE DAVID MEMEGER
UNITED STATES ATTORNEY