

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

UNITED STATES OF AMERICA	:	CRIMINAL NO. <u>13-_____</u>
v.	:	DATE FILED:
SHAUN TERRELL MAYS, a/k/a "Shiz"	:	VIOLATIONS:
	:	18 U.S.C. § 1029(a)(2) (use of one or more unauthorized access devices - 2 counts)
	:	18 U.S.C. § 1028A(a)(1) (aggravated identity theft - 4 counts)
	:	18 U.S.C. § 1344 (bank fraud - 2 counts)
	:	18 U.S.C. § 2 (aiding and abetting) Notice of forfeiture

INFORMATION

COUNT ONE

THE UNITED STATES ATTORNEY CHARGES THAT:

On or about October 15, 2010, in the District of Delaware and elsewhere,
defendant

**SHAUN TERRELL MAYS,
a/k/a "Shiz"**

knowingly and with the intent to defraud used, and aided and abetted the use of, an unauthorized access device, that is, a Costco American Express credit card issued on the account of J.M., to obtain things of value aggregating \$1,000 or more during a one-year period, thereby affecting interstate commerce.

In violation of Title 18, United States Code, Section 1029(a)(2).

COUNT TWO

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

On or about May 5, 2011, in the Eastern District of Pennsylvania and elsewhere,
defendant

**SHAUN TERRELL MAYS,
a/k/a "Shiz"**

knowingly and with the intent to defraud used, and aided and abetted the use of, an unauthorized access device, that is, a Wells Fargo Jewelry Advantage credit card issued on the account of M.S., to obtain things of value aggregating \$1,000 or more during a one-year period, thereby affecting interstate commerce.

In violation of Title 18, United States Code, Section 1029(a)(2).

COUNT THREE

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

On or about October 15, 2010, in the District of Delaware, and elsewhere,
defendant

**SHAUN TERRELL MAYS,
a/k/a "Shiz"**

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, driver's license number, and personal identifying information of J.M., during and in relation to the use of an unauthorized access device.

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

COUNT FOUR

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

On or about March 10, 2011, in the Eastern District of Pennsylvania, and elsewhere, defendant

**SHAUN TERRELL MAYS,
a/k/a "Shiz"**

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, driver's license number, and personal identifying information of R.R. and the PNC Bank account number ending in 2934, during and in relation to bank fraud.

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

COUNT FIVE

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

On or about May 5, 2011, in the Eastern District of Pennsylvania, and elsewhere,
defendant

**SHAUN TERRELL MAYS,
a/k/a "Shiz"**

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, driver's license number, and personal identifying information of M.S., during and in relation to the use of an unauthorized access device.

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

COUNT SIX

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

On or about June 7, 2011, in the Eastern District of Pennsylvania, and elsewhere,
defendant

**SHAUN TERRELL MAYS,
a/k/a "Shiz"**

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, driver's license number, and personal identifying information of J.D. and the Wells Fargo Bank account number ending in 7072, during and in relation to bank fraud.

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

COUNT SEVEN

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

1. At all times material to this information, Wells Fargo Bank was a financial institution whose deposits were insured by the Federal Deposit Insurance Corporation, Certificate Number 3511.

2. From on or about February 14, 2011, to on or about June 7, 2011, in the Eastern District of Pennsylvania and elsewhere, defendant

**SHAUN TERRELL MAYS,
a/k/a "Shiz"**

knowingly executed, 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 Wells Fargo Bank by means of false and fraudulent pretenses, representations, and promises.

It was a part of the scheme that:

3. Defendant SHAUN TERRELL MAYS and B.E. obtained means of identification and identity information, including the names, dates of birth, driver's license numbers, social security numbers, and bank account numbers of Wells Fargo Bank customers, including customers with the initials C.B., C.T., L.Z., R.D., J.L., R.R., D.I., and J.D.

4. Defendant SHAUN TERRELL MAYS and B.E. illegally provided the means of identification and identity information, including the names, dates of birth, driver's license numbers, social security numbers, and bank account numbers of Wells Fargo Bank customers, including customers with the initials C.B., C.T., L.Z., R.D., J.L., R.R., D.I., and J.D.,

to Richard England Kelso, charged elsewhere, along with driver's licenses in the names of the Wells Fargo Bank customers but containing Kelso's photograph.

5. Defendant SHAUN TERRELL MAYS and B.E. drove Richard England Kelso to various Wells Fargo Bank branches within the Eastern District of Pennsylvania and elsewhere, and instructed Kelso to withdraw specific amounts of money from, purchase cashier's checks from, and cash cashier's checks against the accounts of the Wells Fargo Bank customers by utilizing the means of identification, identity information, and drivers' licenses that had been provided to Kelso.

6. Richard England Kelso withdrew large amounts of cash from the bank accounts of Wells Fargo Bank customers whose means of identification and identity information had been provided to him by defendant SHAUN TERRELL MAYS and B.E., including customers with the initials C.B., C.T, L.Z., R.D., J.L., R.R., D.I., and J.D., all without the customers' knowledge and consent, by making cash withdrawals from their accounts and purchasing and cashing certified checks with funds drawn from or against their accounts.

7. After he successfully obtained funds from the customers' accounts, Richard England Kelso gave the cash and checks to defendant SHAUN TERRELL MAYS and B.E., who in turn paid Kelso for obtaining the funds.

8. In furtherance of the scheme, at the direction of defendant SHAUN TERRELL MAYS and B.E. and using the means of identification and identity information they provided, Richard England Kelso made and attempted to make the following fraudulent transactions, as to each of which Kelso presented a driver's license that had been provided to him by defendant SHAUN TERRELL MAYS in the name of the account holder but containing

Kelso's photograph:

<u>DATE</u>	<u>LOCATION</u>	<u>CUSTOMER ACCOUNT ACCESSED</u>	<u>FRAUDULENT TRANSACTION(S)</u>
2/14/11	Delran, NJ	C.B.	\$4,600 cash withdrawal and purchased \$7,500 cashier's check, #6768301022, made payable to C.T.
2/15/11	Levittown, PA	C.B.	\$4,000 cash withdrawal and purchased \$6,500 cashier's check, #1403965371, made payable to C.T.
2/15/11	Ridley Park, PA	C.T.	cashd \$7,500 cashier's check, #6768301022, payable to C.T.
2/16/11	Trevose, PA	C.T.	cashd \$6,500 cashier's check, #1403965371, payable to C.T.
2/16/11	Philadelphia, PA	C.B.	\$4,800 cash withdrawal attempt
2/16/11	Lawrenceville, NJ	C.T.	\$4,800 cash withdrawal and purchased \$7,500 cashier's check, #6758401045, payable to C.B.
2/16/11	Bensalem, PA	C.B.	cashd \$7,500 cashier's check, #6758401045, payable to C.B.
2/17/11	Philadelphia, PA	C.T.	\$4,400 cash withdrawal and purchased \$6,000 cashier's check, #1403958862, payable to C.B.
2/17/11	Norristown, PA	C.B.	cashd \$6,000 cashier's check, #1403958862, payable to C.B.
2/18/11	Thorndale, PA	C.B.	\$4,800 cash withdrawal
2/18/11	Devon, PA	C.T.	\$4,800 cash withdrawal
2/19/11	Bensalem, PA	C.B.	\$5,500 cash withdrawal
2/19/11	Bensalem, PA	C.T.	\$4,500 cash withdrawal
2/22/11	Philadelphia, PA	C.B.	\$6,000 cash withdrawal attempt
2/22/11	Philadelphia, PA	C.B.	\$3,000 cash withdrawal
3/2/11	Southampton, PA	L.Z.	\$5,700 cash withdrawal

<u>DATE</u>	<u>LOCATIONS</u>	<u>CUSTOMER ACCOUNT ACCESSED</u>	<u>FRAUDULENT TRANSACTION(S)</u>
3/3/11	Turnersville, NJ	R.D.	\$6,400 cash withdrawal
3/10/11	Thorndale, PA	J.L.	\$4,800 cash withdrawal
3/10/11	Devon, PA	R.R.	\$4,800 cash withdrawal
3/11/11	Lafayette Hill, PA	R.R.	\$4,700 cash withdrawal
3/15/11	Ridley Park, PA	R.R.	\$4,000 cash withdrawal
3/28/11	Ridley Park, PA	D.L.	\$5,000 cash withdrawal
6/7/11	Ridley Park, PA	J.D.	\$6,500 cash withdrawal attempt

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

COUNT EIGHT

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

1. At all times material to this indictment, PNC Bank was a financial institution whose deposits were insured by the Federal Deposit Insurance Corporation, Certificate Number 6384.

2. From on or about March 10, 2011, to on or about March 16, 2011, in the Eastern District of Pennsylvania and elsewhere, defendant

**SHAUN TERRELL MAYS,
a/k/a "Shiz"**

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

It was a part of the scheme that:

3. Defendant SHAUN TERRELL MAYS obtained means of identification and identity information, including the name, date of birth, driver's license number, social security number, and bank account number of a PNC Bank customers with the initials R.R.

4. Defendant SHAUN TERRELL MAYS illegally provided the means of identification and identity information, including the name, date of birth, driver's license number, social security number, and bank account number of PNC Bank customer R.R. to Richard England Kelso, charged elsewhere, along with a driver's license in the names of R.R. but containing Kelso's photograph.

5. Defendant SHAUN TERRELL MAYS drove Richard England Kelso to

various PNC Bank branches within the Eastern District of Pennsylvania, and instructed Kelso to withdraw specific amounts of money from R.R.'s PNC Bank account by utilizing the means of identification, identity information, and drivers' license that had been provided to Kelso.

6. Richard England Kelso withdrew large amounts of cash from the bank account of PNC Bank customer R.R. without R.R.'s knowledge and consent.

7. After he successfully obtained funds from R.R.'s PNC Bank account, Richard England Kelso gave the cash to defendant SHAUN TERRELL MAYS, who in turn paid Kelso for obtaining the funds.

8. In furtherance of the scheme, at the direction of defendant SHAUN TERRELL MAYS and using the means of identification and identity information he provided, Richard England Kelso made and attempted to make the following fraudulent transactions, as to each of which Kelso presented a driver's license that had been provided to him by defendant SHAUN TERRELL MAYS in the name of R.R. but containing Kelso's photograph:

<u>DATE</u>	<u>LOCATION</u>	<u>CUSTOMER ACCOUNT ACCESSED</u>	<u>FRAUDULENT TRANSACTION(S)</u>
3/10/11	Philadelphia, PA	R.R.	\$4,800 cash withdrawal
3/12/11	Philadelphia, PA	R.R.	\$5,500 cash withdrawal
3/15/11	Lansdowne, PA	R.R.	\$4,600 cash withdrawal
3/16/11	Philadelphia, PA	R.R.	\$5,000 cash withdrawal

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

NOTICE OF FORFEITURE

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

1. As a result of the violations of Title 18, United States Code, 1029(a)(2) and 1344 set forth in this information, defendant

**SHAUN TERRELL MAYS,
a/k/a "Shiz"**

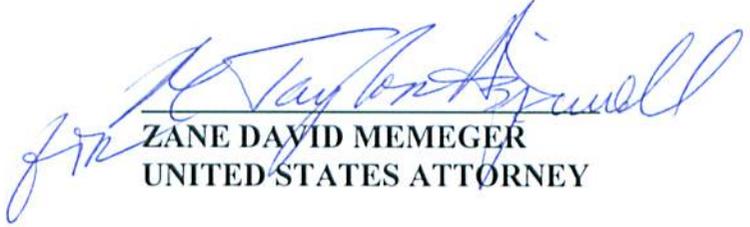
shall forfeit to the United States of America any property constituting, or derived from, proceeds obtained directly or indirectly from the commission of such offense, including but not limited to \$155,912.56 in United States currency (money judgment).

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, Sections 982(a)(2)(A), (a)(2)(B).


ZANE DAVID MEMEGER
UNITED STATES ATTORNEY