

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

UNITED STATES OF AMERICA	:	CRIMINAL NO.
v.	:	DATE FILED
CELESTE C. PAIGE	:	VIOLATIONS:
	:	18 U.S.C. § 1344 (bank fraud - 2 count)
	:	18 U.S.C. § 1028A(a)(1) (aggravated identity theft – 2 counts)
	:	18 U.S.C. § 2 (aiding and abetting) Notice of forfeiture

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 in or about July 2011 through in or about October 2011, in the Eastern District of Pennsylvania and elsewhere, defendant

CELESTE C. PAIGE

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 CELESTE C. PAIGE.

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 CELESTE C. PAIGE, to various TD Bank branches within the Eastern District of Pennsylvania and elsewhere, and instructed the runners to cash fraudulent checks made payable to or 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. In furtherance of the scheme, defendant CELESTE C. PAIGE and other co-schemers known and unknown to the grand jury, used means of identification and identity information of TD Bank customers, as well as false drivers’ licenses, to access numerous TD Bank accounts that had been identified by Patricia Lightsey, all of which were accessed without

the customers' knowledge and consent, and all of which caused TD Bank to suffer an actual loss of at least approximately \$170,820, with an intended loss of at least approximately \$304,772.

9. In furtherance of the scheme, defendant CELESTE C. PAIGE performed and aided and abetted the performance of the following acts, among others, which caused an actual loss to TD Bank of at least approximately \$51,546.82, with an intended loss of at least approximately \$116,227.22:

TD Bank Account of Anchor Moving and Storage

(Actual Loss of Approximately \$2,880.11)

10. On or about August 11, 2011, at a TD Bank branch located in Middletown, New Jersey, defendant CELESTE C. PAIGE cashed a fraudulent check purportedly issued by TD Bank customer Anchor Moving and Storage, check #414 in the amount of \$2,880.11, made payable to C.M., purportedly drawn on the TD Bank account of Anchor Moving and Storage ending in 8094. At the time she cashed this fraudulent check, defendant PAIGE presented a driver's license in C.M.'s name but containing defendant PAIGE's photograph.

TD Bank Account of American Athletic Courts, Inc.

(Actual Loss of Approximately \$3,850.36)

11. On or about August 11, 2011, at a TD Bank branch located in Hazlet, New Jersey, defendant CELESTE C. PAIGE cashed a fraudulent check purportedly issued by TD Bank customer American Athletic Courts, Inc., check #20236 in the amount of \$1,733.52, made payable to C.M., purportedly drawn on the TD Bank account of American Athletic Courts, Inc. ending in 9608. At the time she cashed this fraudulent check, defendant PAIGE presented a driver's license in C.M.'s name but containing defendant PAIGE's photograph.

12. On or about August 12, 2011, at a TD Bank branch located in Spring Lake Heights, New Jersey, defendant CELESTE C. PAIGE cashed a fraudulent check purportedly issued by TD Bank customer American Athletic Courts, Inc., check #20239 in the amount of \$2,116.84, made payable to C.M., purportedly drawn on the TD Bank account of American Athletic Courts, Inc. ending in 9608. At the time she cashed this fraudulent check, defendant PAIGE presented a driver's license in C.M.'s name but containing defendant PAIGE's photograph.

TD Bank Accounts of S.L.

(Actual Loss of Approximately \$3,250 and Intended Loss of Approximately \$11,878.07)

13. On or about August 24, 2011, at a TD Bank branch located in Metuchen, New Jersey, with the assistance of defendant CELESTE C. PAIGE and while she watched, an unidentified male co-schemer unknown to the grand jury (hereinafter "UM#1") deposited into the TD Bank account of S.L. and I.S. ending in 0039, a fraudulent check purportedly drawn on a JPMorgan Chase Bank account of GIC Built, check #243 in the amount of \$8,628.07, made payable to S.L. At the time UM#1 deposited this fraudulent check, he presented a driver's license in S.L.'s name but containing UM#1's photograph.

14. On or about August 24, 2011, at a TD Bank branch located in Metuchen, New Jersey, with the assistance of defendant CELESTE C. PAIGE and while she watched, UM#1 withdrew \$250 from the TD Bank account of S.L. ending in 6117. At the time UM#1 made this withdrawal, he presented a driver's license in S.L.'s name but containing UM#1's photograph.

15. On or about August 24, 2011, at a TD Bank branch located in Metuchen, New Jersey, with the assistance of defendant CELESTE C. PAIGE and while she watched,

UM#1 withdrew \$3,000 from the TD Bank account of S.L. ending in 6117. At the time UM#1 made this withdrawal, he presented a driver's license in S.L.'s name but containing UM#1's photograph.

TD Bank Account of R.L. and E.L.

(Actual Loss of Approximately \$16,066.35 and Intended Loss of Approximately \$23,892.43)

16. On or about August 24, 2011, at a TD Bank branch located in Langhorne, Pennsylvania, defendant CELESTE C. PAIGE cashed against the TD Bank account of R.L. and E.L. ending in 8035, a fraudulent check purportedly drawn on a Valley National Bank account of Lexington Equities LLC., check #1270 in the amount of \$8,226.15, made payable to E.L. At the time she cashed this fraudulent check, defendant PAIGE presented a driver's license in E.L.'s name but containing defendant PAIGE's photograph.

17. On or about August 24, 2011, at a TD Bank branch located in Levittown, Pennsylvania, with the assistance of defendant CELESTE C. PAIGE and while she watched, UM#1 cashed against the TD Bank account of R.L. and E.L. ending in 8035, a fraudulent check purportedly drawn on a Valley National Bank account of Lexington Equities LLC., check #1275 in the amount of \$7,840.20, made payable to R.L. At the time UM#1 cashed this fraudulent check, he presented a driver's license in R.L.'s name but containing UM#1's photograph.

18. On or about August 26, 2011, at a TD Bank branch located in Newtown, Pennsylvania, defendant CELESTE C. PAIGE attempted to cash against the TD Bank account of R.L. and E.L. ending in 8035, a fraudulent check purportedly drawn on a Valley National Bank account of Lexington Equities LLC., check #1277 in the amount of \$7,826.08, made payable to E.L. When the teller refused to cash this fraudulent check, defendant PAIGE deposited the fraudulent check into the TD Bank account of R.L. and E.L. ending in 8035. At the time she

attempted to cash and then deposited this fraudulent check, defendant PAIGE presented a driver's license in E.L.'s name but containing defendant PAIGE's photograph.

TD Bank Accounts of R.M. and J.M.

(Actual Loss of Approximately \$8,500 and Intended Loss of Approximately \$39,306.07)

19. On or about October 18, 2011, at a TD Bank branch in Milford, Connecticut, defendant CELESTE C. PAIGE deposited into the TD Bank account of R.M. and J.M. ending in 5226, a fraudulent check purportedly drawn on a Two Rivers Community Bank account of Gasiorowski & Holobinko, check #10089 in the amount of \$18,072.14, made payable to J.M. At the time she deposited this fraudulent check, defendant PAIGE presented a driver's license in J.M.'s name but containing defendant PAIGE's photograph.

20. On or about October 18, 2011, at a TD Bank branch in Glastonbury, Connecticut, defendant CELESTE C. PAIGE deposited into the TD Bank account of J.M. ending in 8228, a fraudulent check purportedly drawn on a Sun National Bank account of Genpro Inc., check #311433 in the amount of \$12,733.93, made payable to J.M. At the time she deposited this fraudulent check, defendant PAIGE presented a driver's license in J.M.'s name but containing defendant PAIGE's photograph.

21. On or about October 18, 2011, at a TD Bank branch in Milford, Connecticut, defendant CELESTE C. PAIGE withdrew \$8,500 from the TD Bank account of J.M. ending in 8228. At the time she made this withdrawal, defendant PAIGE presented a driver's license in J.M.'s name but containing defendant PAIGE's photograph.

TD Bank Account of F.J.

(Actual Loss of Approximately \$17,000 and Intended Loss of Approximately \$34,420.18)

22. On or about October 18, 2011, at a TD Bank branch in New Haven,

Connecticut, defendant CELESTE C. PAIGE deposited into the TD Bank account of F.J. ending in 4428, a fraudulent check purportedly drawn on a Sun National Bank account of Genpro Inc., check #311386 in the amount of \$17,420.18, made payable to F.J. At the time she deposited this fraudulent check, defendant PAIGE presented a driver's license in F.J.'s name but containing defendant PAIGE's photograph.

23. On or about October 18, 2011, at a TD Bank branch in New Haven, Connecticut, defendant CELESTE C. PAIGE withdrew \$8,500 from the TD Bank account of F.J. ending in 4428. At the time she made this withdrawal, defendant PAIGE presented a driver's license in F.J.'s name but containing defendant PAIGE's photograph.

24. On or about October 18, 2011, at a TD Bank branch in New Haven, Connecticut, defendant CELESTE C. PAIGE purchased an \$8,500 Official Check from TD Bank, check number 40348099-1, with funds drawn from the TD Bank account of F.J. ending in 4428. At the time she purchased this Official Check, defendant PAIGE presented a driver's license in F.J.'s name but containing defendant PAIGE's photograph.

25. On or about October 19, 2011, at a TD Bank branch in White Plains, New York, defendant CELESTE C. PAIGE attempted to cash a TD Bank Official Check, check number 40348099-1, which had been made payable to J.M., by falsely endorsing the back of the check using J.M.'s name and by presenting a false driver's license in J.M.'s name but containing defendant PAIGE's photograph.

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

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

1. At all times material to this indictment, Susquehanna Bank was a financial institution whose deposits were insured by the Federal Deposit Insurance Corporation, Certificate Number 7579.

2. From on or about December 21, 2012 through on or about December 24, 2012, in the Eastern District of Pennsylvania and elsewhere, defendant

CELESTE C. PAIGE

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

THE SCHEME

3. One or more co-schemers unknown to the grand jury obtained confidential Susquehanna Bank customer account information for Susquehanna Bank customers who had large balances in their bank accounts.

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

5. Co-schemers known and unknown to the grand jury provided false drivers' licenses containing the names of Susquehanna 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 Susquehanna Bank customers, to runners, including defendant CELESTE C. PAIGE.

6. In furtherance of the scheme, defendant CELESTE C. PAIGE performed and aided and abetted the performance of the following acts, among others, which caused an actual loss to Susquehanna Bank of at least approximately \$5,706.40, with an intended loss of at least approximately \$13,810.70:

Susquehanna Bank Account of Quinn & Wilson Realtors

(Actual Loss of Approximately \$5,706.40 and Intended Loss of Approximately \$13,810.70)

7. On or about December 21, 2012, at a Susquehanna Bank branch located in Marlton, New Jersey, defendant CELESTE C. PAIGE cashed a fraudulent check purportedly issued by Susquehanna Bank customer Quinn & Wilson Realtors, check #22863 in the amount of \$5,706.40, made payable to B.M., purportedly drawn on the Susquehanna Bank account of Quinn & Wilson Realtors ending in 2126. At the time she attempted to cash this fraudulent check, defendant PAIGE presented a driver's license in B.M.'s name but containing defendant PAIGE's photograph.

8. On or about December 21, 2012, at a Susquehanna Bank branch located in Cherry Hill, New Jersey, defendant CELESTE C. PAIGE attempted to cash a fraudulent check purportedly issued by Susquehanna Bank customer Quinn & Wilson Realtors, in the amount of \$5,000, made payable to B.M., purportedly drawn on a First Trust Bank account of Quinn & Wilson Realtors. At the time she attempted to cash this fraudulent check, defendant PAIGE presented a driver's license in B.M.'s name but containing defendant PAIGE's photograph

9. On or about December 24, 2012, at a Susquehanna Bank branch located in

Abington, Pennsylvania, defendant CELESTE C. PAIGE attempted to cash a fraudulent check purportedly issued by Susquehanna Bank customer Quinn & Wilson Realtors, check #2501 in the amount of \$3,104.30, made payable to B.M., purportedly drawn on the Susquehanna Bank account of Quinn & Wilson Realtors ending in 4634. At the time she attempted to cash this fraudulent check, defendant PAIGE presented a driver's license in B.M.'s name but containing defendant PAIGE's photograph.

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

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 24, 2011, in the Eastern District of Pennsylvania, and elsewhere, defendant

CELESTE C. PAIGE

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 R.L., during and in relation to bank fraud.

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

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 26, 2011, in the Eastern District of Pennsylvania, and elsewhere, defendant

CELESTE C. PAIGE

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 E.L., 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 Counts One and Two of this indictment, defendant

CELESTE C. PAIGE

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 \$57,253.22 in United States currency (money judgment).

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

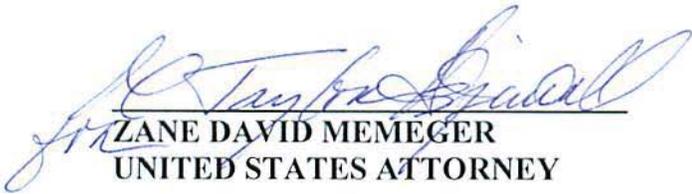
- a. cannot be located upon the exercise of due diligence;
- b. has been transferred to, sold to, or deposited with a third party;
- c. has been placed beyond the jurisdiction of this Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot 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 TRUE BILL:

GRAND JURY FOREPERSON



ZANE DAVID MEMEGER
UNITED STATES ATTORNEY