

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

<b>UNITED STATES OF AMERICA</b>	<b>:</b>	<b>CRIMINAL NO. 12-</b>
<b>v.</b>	<b>:</b>	<b>DATE FILED: January 24, 2013</b>
<b>RAYLENE WILSON</b>	<b>:</b>	<b>VIOLATIONS:</b>
	<b>:</b>	<b>18 U.S.C. § 1028(a)(7) (identity theft - 1</b>
	<b>:</b>	<b>count)</b>
	<b>:</b>	<b>42 U.S.C. § 408 (use of false Social</b>
	<b>:</b>	<b>Security number - 1 count)</b>
		<b>Notice of forfeiture</b>

**INDICTMENT**

**COUNT ONE**

**THE GRAND JURY CHARGES THAT:**

From on or about October 1, 2010 to on or about October 31, 2010 , in the Eastern District of Pennsylvania, and elsewhere, defendant

**RAYLENE WILSON**

knowingly and without lawful authority used, and aided and abetted and willfully caused the use of, a means of identification of another person with the intent to commit, and to aid and abet, a violation of federal law, that is, access device fraud in violation of Title 18, United States Code, Section 1029(a)(2), by fraudulently using American Express credit accounts in the name of C.F. to obtain, and attempt to obtain, services and other things of value totaling at least \$15,000 and thereby affecting interstate commerce.

In violation of Title 18, United States Code, Sections 1028(a)(7), (c)(3)(A) and 2.

**COUNT TWO**

**THE GRAND JURY FURTHER CHARGES THAT:**

From on or about June 25, 2010 to on or about July 18, 2010, in the Eastern District of Pennsylvania, and elsewhere, defendant

**RAYLENE WILSON,**

with intent to deceive, and for the purpose of unlawfully obtaining financing, falsely represented that a Social Security account number with the last four digits 1908 had been assigned to her by the Commissioner of Social Security when in fact such number was not the Social Security account number assigned to her.

In violation of Title 42, United States Code, Section 408(a)(7)(B).

**NOTICE OF FORFEITURE**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. As a result of the violation of Title 18, United States Code, Section 1028(a)(7), set forth in this indictment, defendant

**RAYLENE WILSON**

shall forfeit to the United States of America, any property, real or personal, that constitutes or is derived from proceeds obtained directly or indirectly as a result of such offenses.

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

- (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 defendants 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:**

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**FOREPERSON**

*Zane David Memeger*  
**ZANE DAVID MEMEGER**  
United States Attorney