

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

UNITED STATES OF AMERICA	:	CRIMINAL NO: 14
v.	:	DATE FILED: November 2014
JOHN L. WILLIAMS	:	VIOLATIONS:
	:	18 U.S.C. § 371 (conspiracy- 1 count)
	:	18 U.S.C. § 1344 (bank fraud- 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. Wells Fargo Bank was a financial institution, the deposits of which were insured by the Federal Deposit Insurance Corporation ("FDIC"), certificate number 3511.
2. From in or about August 2013, to in or about February 2014, in the Eastern District of Pennsylvania, the District of Delaware, the District of New Jersey, the District of Maryland, and elsewhere, defendant

JOHN L. WILLIAMS

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.

MANNER AND MEANS

3. It was part of the conspiracy that defendant JOHN WILLIAMS, and other co-conspirators known and unknown to the United States Attorney, participated in an illegal bank withdrawal scheme.

It was further a part of the conspiracy that:

4. Defendant JOHN WILLIAMS and the co-conspirators used fraudulent identification cards, including driver's licenses, which contained the names and personal identification information of persons with accounts at Wells Fargo Bank but the photograph of defendant WILLIAMS or another of the co-conspirators.

5. Defendant JOHN WILLIAMS and other co-conspirators would impersonate the victims and withdraw money from the bank using the fraudulent identification and forging the victim's names on bank withdrawal slips.

6. Another co-conspirator paid defendant JOHN WILLIAMS for his work by giving him cash equal to a portion of the money obtained by making fraudulent cash withdrawals.

7. As a result of the use of fraudulent identifications, defendant JOHN WILLIAMS and his co-conspirators caused at least \$83,000 to be paid by the banks as a result of forged withdrawal slips.

OVERT ACTS

In furtherance of the conspiracy, defendant JOHN WILLIAMS and co-conspirators committed the following overt acts, among others, in the Eastern District of Pennsylvania:

1. On or about August 28, 2013, defendant JOHN WILLIAMS went to the Wells Fargo Bank at 25555 Easton Avenue, Bethlehem, Pa 18017.

2. At the Wells Fargo Bank, defendant JOHN WILLIAMS presented a New Jersey's driver's license with defendant WILLIAMS' photograph and the name of J.R., a bank account holder with an account at Wells Fargo Bank ending in the digits 5123.

3. Using the fraudulent identification, defendant JOHN WILLIAMS made a fraudulent withdrawal of \$4,200 from J.R.'s account

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

COUNT TWO

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

1. Paragraph 1 through 7, and overt acts 1 through 3, 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, the District of Maryland, and elsewhere, defendant

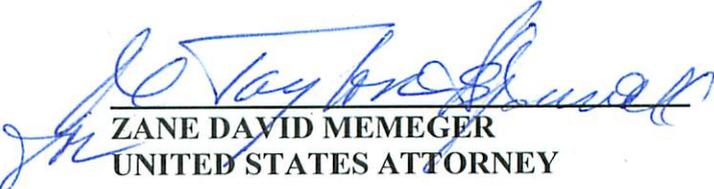
JOHN WILLIAMS

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. On or about August 28, 2013, defendant JOHN WILLIAMS went to the Wells Fargo Bank at 2555 Easton Avenue, Bethlehem, PA 18017, and used a false identification in the name of a bank account holder, J.R., and fraudulently withdrew \$4,200 from J.R.'s bank account.

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


ZANE DAVID MEMEGER
UNITED STATES ATTORNEY