

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

**UNITED STATES OF AMERICA** : **CRIMINAL NO. 14-\_\_\_\_\_**  
**v.** : **DATE FILED: \_\_\_\_\_**  
**TAMYRA FRAZIER** : **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 - 4 counts)**  
: **18 U.S.C. § 2 (aiding & abetting)**  
: **Notice of Forfeiture**

**INDICTMENT**

**COUNT ONE**

**THE GRAND JURY CHARGES THAT:**

At all times material to this information:

1. Beneficial Bank was a financial institution, the deposits of which were insured by the Federal Deposit Insurance Corporation ("FDIC").
2. Defendant TAMYRA FRAZIER was an employee of Beneficial Bank, with computer access to bank account and personal information for Beneficial Bank account holders.
3. From on or about December 1, 2010 through on or about December 28, 2010, in the Eastern District of Pennsylvania and elsewhere, defendant

**TAMYRA FRAZIER**

conspired and agreed, with others known and unknown to the grand jury, to commit offenses against the United States, that is, to knowingly execute, and attempt to execute, and aid and abet the execution of, bank fraud, in violation of Title 18, United States Code, Section 1344, and to

knowingly and without lawful authority use a means of identification of another person during and in relation to bank fraud, in violation of Title 18, United States Code, Section 1028A(a)(1).

#### **MANNER AND MEANS**

4. Defendant TAMYRA FRAZIER and her co-conspirators used stolen identification information to cash fraudulent checks and make fraudulent withdrawals from victims' bank accounts.

5. Defendant TAMYRA FRAZIER, an employee of Beneficial Bank in Jenkintown, Pennsylvania, was recruited by Co-Conspirator 1, a person known to the grand jury, to provide personal and bank account information for Beneficial account holders ("the ID theft victims").

6. Defendant TAMYRA FRAZIER used her position at Beneficial Bank to improperly access personal and bank account information of the ID theft victims, which she provided to Co-Conspirator .

7. Co-Conspirator 1 used the personal and bank account information provided by defendant TAMYRA FRAZIER to manufacture false photographic identifications in the name of the ID theft victims, using the picture of co-conspirator Timmie Garfield, known to the grand jury and charged elsewhere, who was recruited by Co-Conspirator 1 to act as a "check runner," for use in the cashing of fraudulent checks and making of fraudulent withdrawals from the Beneficial Bank accounts of the ID theft victims.

8. Armed with false identification and fraudulent checks, co-conspirator Timmie Garfield posed as the ID theft victims to cash checks made payable to, or withdraw money from, the ID theft victims' Beneficial Bank accounts, totaling an amount in excess of approximately \$41,000.

### **OVERT ACTS**

In furtherance of the conspiracy, defendant TAMYRA FRAZIER and others, known and unknown to the grand jury, committed the following overt acts in the Eastern District of Pennsylvania and elsewhere:

1. On or about December 1, 2010, Co-Conspirator 1 recruited defendant TAMYRA FRAZIER to provide personal and bank account information for the ID theft victims.
2. Between on or about December 1, 2010 and on or about December 28, 2010, defendant TAMYRA FRAZIER provided Co-Conspirator 1 with personal and bank account information for the ID theft victims, including the ID theft victims' names, addresses, telephone numbers and account numbers that defendant FRAZIER had obtained from Beneficial Bank's computer database, including the account and personal information for M.R., F.S., R.A., and E.D.
3. Between on or about December 9, 2010 and on or about December 28, 2010, Co-Conspirator 1 used the account and personal information received from defendant TAMYRA FRAZIER, to manufacture fraudulent driver's licenses, provided those fraudulent driver's licenses to co-conspirator Timmie Garfield and instructed co-conspirator Garfield to conduct the fraudulent transactions against the Beneficial Bank accounts of the ID theft victims at Beneficial Bank branches in the Eastern District of Pennsylvania and New Jersey.

4. Between on or about December 9, 2010 and on or about December 28, 2010, using personal and account information that had been stolen by defendant TAMYRA FRAZIER from Beneficial Bank for the ID theft victims, Co-Conspirator 1 and co-conspirator Timmie Garfield acquired approximately \$41,519.56 from Beneficial Bank by presenting to bank tellers fraudulent identification, checks and withdrawal slips in the names of the ID theft victims and conducting the following fraudulent transactions:

<u>DATE</u>	<u>LOCATION</u>	<u>ACCOUNT HOLDER</u>	<u>FRAUDULENT TRANSACTION AMOUNT</u>
12/09/10	Jenkintown, PA	Milton Riley	\$5,000.00 in withdrawals
12/16/10	Philadelphia, PA	Frank Speziale	\$2,783.42 check cashed
12/16/10	Yeadon, PA	Robert Albano	\$2,884.62 check cashed
12/17/10	Philadelphia, PA	Robert Albano	\$2,797.44 check cashed
12/17/10	Philadelphia, PA	Frank Speziale	\$2,788.49 check cashed
12/17/10	Flourtown, PA	Frank Speziale	\$4,883.61 check cashed
12/18/11	Philadelphia, PA	Robert Albano	\$1,000.00 in withdrawals
12/20/10	Philadelphia, PA	Robert Albano	\$2,000.00 in withdrawals
12/24/10	Riverton, NJ	Eric Dyer	\$4,889.71 check cashed
12/27/10	Montgomeryville, PA	Eric Dyer	\$4,893.27 check cashed

<u>DATE</u>	<u>LOCATION</u>	<u>ACCOUNT HOLDER</u>	<u>FRAUDULENT TRANSACTION AMOUNT</u>
12/28/10	Springhouse, PA	Eric Dyer	\$7,599.00 attempt to cash check

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

## COUNT TWO

### THE GRAND JURY FURTHER CHARGES THAT:

At all times material to this information:

1. Paragraphs 1, 2 and 4 through 8 and Overt Acts 1 through 4 of Count One are realleged here.

2. From on or about December 1, 2010 through on or about December 28, 2010, in the Eastern District of Pennsylvania and elsewhere, defendant

### TAMYRA FRAZIER

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

### THE SCHEME

It was part of the scheme that:

3. Between on or about December 1, 2010, and on or about December 28, 2010, defendant FRAZIER used her position at Beneficial Bank to improperly acquire personal and account information for Beneficial Bank customers M.R., F.S., R.A., and E.D.

4. Defendant TAMYRA FRAZIER then provided that personal and account information to Co-Conspirator 1, who used the stolen account information to manufacture false identification documents and to cash fraudulent checks or make fraudulent withdrawals to acquire approximately \$41,519.56 from Beneficial Bank from bank accounts belonging to M.R., F.S., R.A., and E.D.

5. In furtherance of the scheme, using the personal and bank account information provided to Co-Conspirator 1 by defendant TAMYRA FRAZIER, cop-conspirator Timmie Garfield, known to the grand jury and charged elsewhere, conducted the following fraudulent transactions:

<u>DATE</u>	<u>LOCATION</u>	<u>ACCOUNT HOLDER</u>	<u>FRAUDULENT TRANSACTION AMOUNT</u>
12/09/10	Jenkintown, PA	Milton Riley	\$5,000.00 in withdrawals
12/16/10	Philadelphia, PA	Frank Speziale	\$2,783.42 check cashed
12/16/10	Yeadon, PA	Robert Albano	\$2,884.62 check cashed
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12/17/10	Philadelphia, PA	Frank Speziale	\$2,788.49 check cashed
12/17/10	Flourtown, PA	Frank Speziale	\$4,883.61 check cashed
12/18/11	Philadelphia, PA	Robert Albano	\$1,000.00 in withdrawals
12/20/10	Philadelphia, PA	Robert Albano	\$2,000.00 in withdrawals
12/24/10	Riverton, NJ	Eric Dyer	\$4,889.71 check cashed
12/27/10	Montgomeryville, PA	Eric Dyer	\$4,893.27 check cashed
12/28/10	Springhouse, PA	Eric Dyer	\$7,599.00 attempt to cash check

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

**COUNTS THREE THROUGH SIX**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about the dates listed below, in the Eastern District of Pennsylvania, defendant

**TAMYRA FRAZIER**

knowingly and without lawful authority, used, and aided and abetted the possession and use of, a means of identification of another person, that is, the name and personal identifying information of the persons indicated below, each person constituting a separate count, during and in relation to bank fraud:

<b><u>COUNT</u></b>	<b><u>DATE</u></b>	<b><u>ACCOUNT HOLDER</u></b>
3	12/09/10	M.R.
4	12/16/10	F.S.
5	12/17/10	R.A.
6	12/27/10	E.D.

All 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 this information, defendant

**TAMYRA FRAZIER**

shall forfeit to the United States of America any property, real or personal, that constitutes or is derived from proceeds traceable to the commission of such offenses, as charged in this information, including, but not limited to, the sum of \$33,920.56.

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

- (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 defendant 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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**GRAND JURY FOREPERSON**



**LANE DAVID MEMEGER**  
**UNITED STATES ATTORNEY**