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UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA	:	**Hon. William J. Martini**
	:	
v.	:	**Crim. No. 13– 613 (WJM)**
	:	
SYNETHIA BLAND and	:	**18 U.S.C. § 1349**
LATISHA WHITE	:	**18 U.S.C. § 1344**
	:	**18 U.S.C. § 2**

SUPERSEDING INDICTMENT

COUNT 1
(Conspiracy to Commit Bank Fraud)

The Grand Jury, in and for the District of New Jersey, sitting in Newark, charges:

1. At all times relevant to this Indictment:

a. Defendant SYNETHIA BLAND was a resident of Elizabeth, New Jersey, where during a portion of the relevant time she resided with defendant LATISHA WHITE.

b. Defendant LATISHA WHITE was a resident either of Newark or of Elizabeth, New Jersey; in Elizabeth she resided with Defendant SYNETHIA BLAND.

c. TD Bank was a "financial institution" as defined by Title 18, United States Code, Section 20, whose deposits were insured by the Federal Deposit Insurance Corporation.

THE CONSPIRACY

2. From in or about October 2009 through in or about May 2012, in Union, Essex, Somerset, Middlesex and Morris Counties in the District of New Jersey and elsewhere, defendants

SYNETHIA BLAND and
LATISHA WHITE

did knowingly and intentionally conspire and agree with each other and with others to execute a scheme and artifice to defraud a financial institution, namely, TD Bank, and to obtain monies, funds, credits, assets and securities owned by, and under the custody and control of, TD Bank by means of materially false and fraudulent pretenses, representations, and promises, contrary to Title 18, United States Code, Section 1344.

OBJECT OF THE CONSPIRACY

3. The object of the conspiracy was to profit from depositing or arranging the deposit of counterfeit checks into the bank accounts of various knowing and unknowing accomplices for the purpose of then withdrawing or arranging the withdrawal of funds drawn on those deposits before the bank realized that the checks were counterfeit.

MANNER AND MEANS OF THE CONSPIRACY

4. It was part of the conspiracy that defendants LATISHA WHITE and SYNETHIA BLAND created counterfeit checks using computers and printers along with commercially-available check-writing software and check stock they had purchased.

5. It was further a part of the conspiracy that defendant SYNETHIA BLAND recruited or caused the recruitment of several dozen individuals who either held bank accounts at TD Bank or

were willing to open a new account at TD Bank.

6. It was further a part of the conspiracy that defendant SYNETHIA BLAND informed such individuals or arranged to have them informed that a check would be deposited into those individuals' bank accounts.

7. It was further a part of the conspiracy that defendant SYNETHIA BLAND induced these individuals into participating in the scheme by promising to share some of the proceeds of the deposited checks.

8. It was further a part of the conspiracy that defendant SYNETHIA BLAND and defendant LATISHA WHITE then deposited or arranged to have deposited into the bank accounts of those participating in the scheme the counterfeit checks that the defendants had created.

9. It was further a part of the conspiracy that within a day or two of such deposits, and before TD Bank became aware that a given deposited check was counterfeit, defendant SYNETHIA BLAND and defendant LATISHA WHITE would draw down the funds credited by the deposit of the counterfeit checks.

10. It was further a part of the conspiracy that defendant SYNETHIA BLAND and defendant LATISHA WHITE drew down funds drawn on the checking account into which a counterfeit check had been deposited in various ways. These included making ATM cash withdrawals, submitting cash withdrawal slips at banks or making debit card purchases of merchandise or Postal Money Orders.

EXAMPLES OF FRAUDULENTLY CONDUCTED TRANSACTIONS

Transactions Involving TD Bank Checking Account Ending in 5734

11. On or about June 8, 2010, a TD Bank customer ("Account Holder 1") opened a checking account at TD Bank to which the bank assigned a checking account number ending in 5734 (the "5734 Account").

12. On or about July 12, 2010, defendant SYNETHIA BLAND deposited a check into the 5734 Account made out to Account Holder 1 in the amount of $4,529. The check appeared to be drawn on Wachovia Bank and appeared to be issued by a security company in Bloomfield, New Jersey. In fact, the check was counterfeit.

13. On or about July 14, 2010, two days after the check had been deposited, defendant SYNETHIA BLAND drove her automobile accompanied by defendant LATISHA WHITE and Account Holder 1 to a drive-in window at the branch of the TD Bank located at 465 South Avenue in Cranford.

14. At the drive-in window, defendant SYNETHIA BLAND attempted to withdraw $2,900 from the 5734 Account by submitting a cash withdrawal slip made out in the name of Account Holder 1 and by submitting Account Holder 1's debit card. The transaction was denied.

Transactions Involving TD Bank Checking Account Ending in 4981

15. In 2007, an individual ("Account Holder 2") opened a checking account at a bank later acquired by TD Bank to which the bank assigned a checking account number ending in 4981 (the "4981 Account").

16. In or about February 2012, defendant SYNETHIA BLAND approached Account Holder 2 with an offer to share in some money if Account Holder 2 would give defendant

SYNETHIA BLAND Account Holder 2's debit card and PIN number.

17. Account Holder 2 forwarded a debit card and PIN number for the 4981 Account to defendant SYNETHIA BLAND.

18. On or about February 13, 2012, a check was deposited into the 4981 Account made out to Account Holder 2 in the amount of $4,865.59. The check appeared to be drawn on PNC Bank and appeared to be issued by a settlement fund in Pennsylvania.

19. On or about February 15, 2012, a $1,986.20 purchase was made using a TD Bank debit card for the 4981 Account.

20. On or about February 15, 2012, a $1,302.70 purchase was made at a U.S. Post Office using the TD Bank debit card for the 4981 Account.

21. On or about February 15, 2012, a $743.00 ATM withdrawal was made from the 4981 Account.

22. On or about February 15, 2012, another $743.00 ATM withdrawal was made from the 4981 Account.

23. On or about February 16, 2012, TD Bank learned that the check in the amount of $4,865.59 that had been deposited into the 4981 Account on or about February 13, 2012, had been returned. On further investigation, the bank discovered that the check was counterfeit.

Transactions Involving TD Bank Checking Account Ending in 1509

24. In 2012, a TD Bank customer ("Account Holder 3") had a checking account at TD Bank ending in 1509 (the "1509 Account").

25. On or about May 2, 2012, a check in the amount of $4,725 that was made out to Account Hoder 3 and that appeared to be drawn on Spencer Savings Bank and appeared to be

issued by an insurance agency in Branchville, New Jersey, was deposited at TD Bank's Bridgewater branch into the 1509 Account.

26. On or about May 4, 2012, two days after the deposit of the check in the amount of $4,725, a cash withdrawal in the amount of $1,800 from the 1509 Account was executed by defendants SYNETHIA BLAND and LATISHA WHITE, accompanied by Account Holder 3.

27. Also on or about May 4, 2012, a cash withdrawal in the amount of $2,800 from the 1509 Account was executed by defendants SYNETHIA BLAND and LATISHA WHITE, accompanied by Account Holder 3.

28. The $4,725 check deposited into the 1509 Account, on the basis of which deposit defendants SYNETHIA BLAND and LATISHA WHITE, along with Account Holder 3, successfully made cash withdrawals of $1,800 and then $2,800, was a counterfeit check.

29. The conspiracy to defraud TD Bank involved the use of over 120 bank accounts into which defendants SYNETHIA BLAND and LATISHA WHITE caused to be deposited over 150 counterfeit checks totaling in excess of approximately $600,000 and resulting in losses totaling in excess of approximately $400,000.

In violation of Title 18, United States Code, Section 1349.

COUNTS 2-4
(Bank Fraud)

1. The allegations set forth in paragraphs 1 and 4 through 28 of Count 1 of this Indictment are hereby realleged and incorporated as though set forth in full herein.

2. On or about the dates listed below, in Union, Essex, Somerset, Middlesex and Morris Counties in the District of New Jersey and elsewhere, defendants

SYNETHIA BLAND and
LATISHA WHITE

did knowingly execute, and attempt to execute, a scheme and artifice to defraud a financial institution, namely, TD Bank, and to obtain moneys, funds, credits, assets, securities and other property owned by, and under the custody and control of, a financial institution, namely, TD Bank, by means of materially false and fraudulent pretenses, representations and promises, and for the purpose of executing and attempting to execute this scheme and artifice, defendants SYNETHIA BLAND and LATISHA WHITE knowingly deposited and caused to be deposited counterfeit checks into various checking accounts at TD Bank for the purpose of withdrawing or spending the funds represented by the deposit of the counterfeit checks before the bank realized that the checks were counterfeit, as follows:

Count	TD Bank Account Into Which Counterfeit Check Was Deposited	Approximate Date of Deposit of Counterfeit Check	Approximate Amount of Deposited Counterfeit Check
2	xxxxxx5734	July 12, 2010	$4,529.00
3	xxxxxx4981	February 13, 2012	$4,865.59
4	xxxxxx1509	May 2, 2012	$4,725.00

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

FORFEITURE ALLEGATION

1. The allegations contained in this Indictment are hereby realleged and incorporated by reference for the purpose of noticing forfeiture pursuant to Title 18, United States Code, Section 982.

2. Upon conviction of the offenses set forth in this Indictment, the defendants,

SYNETHIA BLAND and
LATISHA WHITE,

shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 982(a)(2)(A), all property, real or personal, constituting, or derived from, proceeds the defendants obtained directly or indirectly as the result of a violation of Title 18, United States Code, Sections 1349 and 1344, including, but not limited to, a sum of money equal to at least $400,000 in United States currency, as to which the defendants shall be jointly and severally liable with any and all other defendants.

3. If any of the above-described forfeitable property, 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 21, United States Code, Section 853, to seek

forfeiture of any other property of the defendants up to the value of the forfeitable property described in this forfeiture allegation.

A TRUE BILL

FOREPERSON

PAUL J. FISHMAN
UNITED STATES ATTORNEY

CASE NUMBER: Crim. No. 13-613 (WJM)

United States District Court
District of New Jersey

UNITED STATES OF AMERICA

v.

SYNETHIA BLAND AND LATISHA WHITE

SUPERSEDING INDICTMENT FOR

18 U.S.C. §§ 1349,1344 and 2

A True Bill,

Foreperson

PAUL J. FISHMAN
UNITED STATES ATTORNEY
NEWARK, NEW JERSEY

BOHDAN VITVITSKY
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(Ed. 1/97)