

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

Case No. _____
18 U.S.C. § 371
18 U.S.C. § 1343
18 U.S.C. § 1029(a)(2)
18 U.S.C. § 1028A(a)(1)

UNITED STATES OF AMERICA

v.

**SHARITA HUBBARD,
ONAKIA GRIFFIN,
LAKENYA KNIGHT,
and
CHERRALYN MILTON-BROWNER,**

Defendants.

_____ /

INDICTMENT

The Grand Jury charges that:

GENERAL ALLEGATIONS

At times material to this Indictment:

1. University MRI Diagnostic Center was a health care provider with a facility located at 3848 FAU Blvd., Boca Raton, Palm Beach County, Florida.
2. Defendant **SHARITA HUBBARD** was employed by University MRI Diagnostic Center in medical records from on or about October 9, 2006, to on or about February 1, 2008. In her capacity in medical records, defendant **SHARITA HUBBARD** was authorized to access patient files

and copy patient face sheets for the purpose of performing her job duties.

3. Holy Cross Hospital was a health care provider located at 4725 No. Federal Highway, Ft. Lauderdale, Florida.

4. Defendant **SHARITA HUBBARD** was employed by Holy Cross Hospital from on or about June 25, 2006, to in or about March, 2008. In her capacity in medical records, defendant **SHARITA HUBBARD** was authorized to access patient files and copy patient face sheets for the purpose of performing her job duties.

5. North Ridge Medical Center was a health care provider located at 4725 North Federal Highway, Ft. Lauderdale, Florida.

6. Defendant **SHARITA HUBBARD** was employed by North Ridge Medical Center from in or about March 2008, to on or about June 1, 2008. In her capacity in medical records, defendant **SHARITA HUBBARD** was authorized to access patient files and copy patient face sheets for the purpose of performing her job duties.

7. Oncology and Hematology Associates of West Broward was a health care provider located at 7431 No. University Drive, Tamarac, Florida.

8. Defendant **SHARITA HUBBARD** was employed by Oncology and Hematology Associates of West Broward from on or about September 10, 2008, to on or about February 10, 2009. In her capacity in medical records, defendant **SHARITA HUBBARD** was authorized to access patient files and copy patient face sheets for the purpose of performing her job duties.

COUNT 1
(18 USC § 371: Conspiracy)

9. The allegations contained in the General Allegations section of this Indictment are

incorporated by reference as though realleged in their entirety.

10. From in or about October 2008, and continuing through on or about February 10, 2009, at Broward and Palm Beach Counties, in the Southern District of Florida, and elsewhere, the defendants,

**SHARITA HUBBARD,
ONAKIA GRIFFIN,
LAKENYA KNIGHT,
and
CHERRALYN MILTON-BROWNER,**

did knowingly and willfully combine, conspire, confederate, and agree with each other and with others known and unknown to the Grand Jury, to defraud the United States and to commit certain other offenses against the United States, namely:

a. to knowingly and with specific intent to defraud, devise a scheme and artifice to defraud and to obtain money and property by means of materially false and fraudulent pretenses, representations and promises, and, for the purpose of executing such scheme and artifice, to knowingly transmit and cause to be transmitted, by means of wire communications in interstate and foreign commerce, certain writings, signs, signals, pictures and sounds, in violation of Title 18, United States Code, Sections 1343;

b. to knowingly transfer, possess, and use, without lawful authority, a means of identification of another person with the intent to commit, or to aid and abet, or in connection with, any unlawful activity that constitutes a violation of Federal law, or that constitutes a felony under any applicable State or local law, in violation of Title 18, United States Code, Section 1028(a)(7);

c. to knowingly and with intent to defraud use one or more unauthorized access devices during a one year period, and by such conduct obtain things of value, aggregating \$1,000 or more,

which affected interstate and foreign commerce, in violation of Title 18, United States Code, Section 1029(a)(2); and

d. during and in relation to a felony violation of Title 18, United States Code, Chapter 47, to wit, Title 18, United States Code, Section 1029(a)(2), to knowingly possess and use, without lawful authority, a means of identification of another person, in violation of Title 18, United States Code, Section 1028A(a)(1).

OBJECT OF THE CONSPIRACY

11. It was the object of the conspiracy that the defendants and others would unlawfully enrich themselves by stealing personal information of patients of University MRI Diagnostic Center, Holy Cross Hospital, North Ridge Medical Center, and Oncology and Hematology Associates of West Broward, including, among other information, the patients' names, dates of birth, Social Security numbers, Medicare numbers, and addresses, and using the patients' stolen information to obtain credit cards thereby defrauding the victims of a sum in excess of \$162,000.

MANNER AND MEANS

The manner and means by which the defendants and others sought to accomplish the object of the conspiracy included the following:

12. Defendant **SHARITA HUBBARD**, while employed by health care providers, copied the patient face sheets which contained personal identification information of the patients of the health care providers.

13. Defendant **SHARITA HUBBARD** then sold the personal identification information of the patients to defendant **ONAKIA GRIFFIN** and/or other co-conspirators.

14. Defendants **SHARITA HUBBARD** and **ONAKIA GRIFFIN** and/or co-conspirators

then caused the personal information to be used to fraudulently obtain credit card accounts in the names of the patients whose personal identification information had been stolen by defendant **SHARITA HUBBARD**.

15. Defendants **SHARITA HUBBARD, LAKENYA KNIGHT, ONAKIA GRIFFIN** and co-conspirators then incurred and caused to be incurred fraudulent charges on the credit card accounts which had been fraudulently opened.

OVERT ACTS

In furtherance of the conspiracy and to effect the objects thereof, the following overt acts, among others, were committed in Broward County, in the Southern District of Florida, and elsewhere, by at least one co-conspirator:

16. On or about October 16, 2008, defendant **SHARITA HUBBARD** and/or a co-conspirator fraudulently opened and caused to be opened a Care Credit account number ending in 4831 in the name of T.S.

17. In or about November 2008, defendant **SHARITA HUBBARD** sold Care Credit account number ending in 4831 in the name of T.S., to defendant **LAKENYA KNIGHT** for \$1,000.

18. On or about December 15, 2008, defendant **LAKENYA KNIGHT** fraudulently charged \$2,500 on the Care Credit account number ending in 4831 in the name of T.S.

19. On or about January 8, 2009, defendant **SHARITA HUBBARD** sent a text message to defendant **ONAKIA GRIFFIN** with the name, address, Social Security number, date of birth and telephone number of an individual with the initials "P.G."

20. On or about January 19, 2009, defendant **SHARITA HUBBARD** sent a text message to defendant **ONAKIA GRIFFIN** with the name, Social Security number, date of birth, address and

telephone number of an individual with the initials “M.V.”

21. On or about January 22, 2009, defendant **ONAKIA GRIFFIN** and/or a co-conspirator fraudulently opened a Chevron Visa account number ending in 6807 in the name of M.F.V.

22. On or about January 31, 2009, defendant **ONAKIA GRIFFIN** fraudulently charged \$527.00 on the Chevron Visa account number ending in 6807 in the name of M.F.V.

23. On or about November 6, 2008, defendant **CHERRALYN MILTON-BROWNER** fraudulent charged \$105.99 on Chevron Visa account number ending in 0655 in the name of C.S.

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

COUNTS 2-3
(18 USC §1343: Wire Fraud)

24. The allegations contained in the General Allegations section of this Indictment are incorporated herein as though realleged in their entirety.

SCHEME AND ARTIFICE

25. It was the object of the scheme and artifice to defraud for defendant **ONAKIA GRIFFIN** to enrich herself and others unjustly by stealing personal identification information of patients at health care providers, then fraudulently obtaining credit cards in the names of the patients and fraudulently incurring charges on the fraudulently obtained credit cards.

26. On or about the dates listed below, at Broward and Palm Beach Counties, in the Southern District of Florida, and elsewhere, the defendant,

ONAKIA GRIFFIN,

did knowingly and willfully devise a scheme and artifice to defraud, and for obtaining money and

property, by means of materially false and fraudulent pretenses, representations, and promises, and, for the purpose of executing and attempting to execute such scheme and artifice, did knowingly transmit and cause to be transmitted in interstate commerce by means of wire communications, certain writings, signs, signals and sounds, as more specifically described below:

COUNT	DATE	DEFENDANT	DESCRIPTION OF WIRE COMMUNICATION
2	12/8/08	ONAKIA GRIFFIN	Telephone call from the Southern District of Florida to Chevron Visa in Alpharetta, Georgia
3	2/3/09	ONAKIA GRIFFIN	Telephone call from the Southern District of Florida to Chevron Visa in Alpharetta, Georgia

All in violation of Title 18, United States Code, Sections 1343 and 2.

COUNT 4
(18 USC §1029 (a)(2))
(Use of Unauthorized Access Device)

27. From in or about November 2008, through on or about February 10, 2009, in Broward and Palm Beach Counties, in the Southern District of Florida, and elsewhere, the defendants,

SHARITA HUBBARD,
ONAKIA GRIFFIN
and
LAKENYA KNIGHT,

did knowingly, and with intent to defraud, traffic and use one or more unauthorized access devices, during a one-year period, and by such conduct obtained a thing of value aggregating \$1,000 or more during that period, said conduct affecting interstate and foreign commerce, in violation of Title 18, United States Code, Sections 1029(a)(2) and 2.

COUNTS 5-9
(18 USC §1028A(a)(1): Aggravated Identity Theft)

28. The allegations contained in the General Allegations section of this Indictment are incorporated herein as though realleged in their entirety.

29. On or about the dates set forth below, in Broward County, in the Southern District of Florida, and elsewhere, the defendants,

SHARITA HUBBARD,
ONAKIA GRIFFIN,
and
LAKENYA KNIGHT,

during and in relation to a felony violation of Title 18, United States Code, Chapter 47, to wit, Title 18, United States Code, Section 1029(a)(2), that is, trafficking in and using one or more unauthorized access devices, during a one year period, and by such conduct obtaining a thing of value aggregating \$1,000 or more during that period, did knowingly transfer, possess and use, without lawful authority, the means of identification of another person:

COUNT	DATE	DEFENDANT	MEANS OF IDENTIFICATION AND TRANSACTION
5	11/08	SHARITA HUBBARD	T.S.'s Name - Sale of Care Credit Account ending in 4831
6	12/2/08	LAKENYA KNIGHT	T.S.'s Name - Payment for dental care in the amount of approximately \$1,603.00 using Care Credit Account ending in 4831
7	12/15/08	LAKENYA KNIGHT	T.S.'s Name - Payment for dental care in the amount of approximately \$2,500.00 using Care Credit Account ending in 4831

8	1/31/09	ONAKIA GRIFFIN	M.V.'s Name - Purchase of electronics at Target in the amount of \$527.88 using Chevron Visa card ending in 6807
9	2/10/09	ONAKIA GRIFFIN	E.R.'s Name - Purchase of aquarium supplies at Pet Smart in the amount of \$104.99 using Chevron Visa card ending in 8115

All in violation of Title 18, United States Code, Sections 1028A(a)(1), (c)(4), and 2.

A TRUE BILL.

GRAND JURY FOREPERSON

JEFFREY H. SLOMAN
UNITED STATES ATTORNEY

JENNIFER A. KEENE
ASSISTANT UNITED STATES ATTORNEY