

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

<b>UNITED STATES OF AMERICA</b>	<b>:</b>	<b>CRIMINAL NO. 15-_____</b>
<b>v.</b>	<b>:</b>	<b>DATE FILED: <u>September 17, 2015</u></b>
<b>AARON DASHAWN CAPLE</b>	<b>:</b>	<b>VIOLATIONS:</b>
	<b>:</b>	<b>18 U.S.C. § 1344 (bank fraud – 4 counts)</b>
	<b>:</b>	<b>18 U.S.C. § 1028A(a)(1) (aggravated identity theft – 22 counts)</b>
	<b>:</b>	<b>18 U.S.C. § 2 (aiding and abetting) Notice of forfeiture</b>

**INDICTMENT**

**COUNT ONE**

**THE GRAND JURY CHARGES THAT:**

1. At all times material to this indictment, the Pennsylvania State Employee Credit Union (“PSECU”) was a financial institution whose deposits were insured by the National Credit Union Share Insurance Fund.

2. From in or about November 2014 through in or about September 2015, in the Eastern District of Pennsylvania and elsewhere, defendant

**AARON DASHAWN CAPLE**

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

**THE SCHEME**

3. Defendant AARON DASHAWN CAPLE used social media to solicit co-schemers known and unknown to the grand jury to provide defendant CAPLE with the co-

schemers' automated teller machine ("ATM") cards and personal identification numbers ("PINs") by promising the co-schemers quick cash in return for the use of their cards and access to their accounts at banks and other financial institutions.

4. Defendant AARON DASHAWN CAPLE maintained Twitter and Facebook accounts and posted "tweets" on Twitter and status updates on Facebook to solicit potential co-schemers to direct message defendant CAPLE if they wanted to make quick cash and had an account at a bank or other financial institution. Defendant CAPLE named several specific banks and other financial institutions whose accounts he had accessed in the past, including Bank of America, TD Bank, PNC Bank, Santander Bank, Navy Federal Credit Union, M&T Bank, Police and Fire Credit Union, and PSECU.

5. Defendant AARON DASHAWN CAPLE solicited potential co-schemers to provide him with access to their accounts at banks and other financial institutions by "tweeting" and posting on defendant CAPLE's Twitter account messages, images, and photographs designed to demonstrate how lucrative defendant CAPLE's scheme was, including numerous photographs of piles of cash and defendant CAPLE wearing expensive clothing.

6. Defendant AARON DASHAWN CAPLE obtained checks and checkbooks from inactive or closed accounts at banks and other financial institutions that defendant CAPLE knew were either closed or otherwise invalid accounts.

7. Defendant AARON DASHAWN CAPLE obtained checks and checkbooks from fraudulently-opened PSECU accounts that had been opened using false names, addresses, and state identification numbers, and which defendant CAPLE knew had little to no funds in them such that checks written from those accounts would not clear.

8. Defendant AARON DASHAWN CAPLE caused checks he had obtained

from the inactive or closed bank and other financial institution accounts and the fraudulently-opened PSECU accounts to be endorsed and made payable in various dollar amounts to those co-schemers who had agreed in response to defendant CAPLE's solicitations through social media to provide defendant CAPLE with their ATM cards and PINs.

9. Defendant AARON DASHAWN CAPLE used the ATM cards and PINs he obtained from co-schemers to personally deposit and to direct the co-schemers to deposit into the co-schemers' accounts at banks and other financial institutions numerous fraudulent checks that defendant CAPLE caused to be written from accounts defendant CAPLE knew were closed, invalid, or otherwise lacked sufficient funds.

10. Defendant AARON DASHAWN CAPLE used the ATM cards and PINs he obtained from the co-schemers to withdraw and direct the co-schemers to withdraw cash from the co-schemers accounts before the banks and other financial institutions discovered that the deposited checks were fraudulent or the source accounts lacked sufficient funds.

11. Defendant AARON DASHAWN CAPLE and the co-schemers shared the proceeds that were fraudulently obtained from the co-schemers' bank and other financial institution accounts.

12. Defendant AARON DASHAWN CAPLE instructed the co-schemers to falsely represent to any investigator who might question the co-schemers about the fraudulent transactions that the co-schemers had lost their ATM cards and PINs and had no knowledge of who deposited the fraudulent checks and withdrew the cash.

13. In furtherance of the scheme, on or about the following dates, in the Eastern District of Pennsylvania and elsewhere, defendant AARON DASHAWN CAPLE used and caused to be used account numbers, ATM cards, and PINs of PSECU account holders to

make fraudulent check deposits into and fraudulent withdrawals from the PSECU account

holders' accounts, including the following:

<u>Date</u>	<u>Location</u>	<u>PSECU Account Holder</u>	<u>Fraudulent Transactions</u>
11/17/14	ATM located at PNC Bank, 5900 N. Broad St., Philadelphia, PA	L.R.	Using ATM card and PIN of L.R. to deposit a fraudulent check in the amount of \$1,107 into PSECU account of L.R.
11/18/14	ATM located at PNC Bank, 3244 N. Broad St., Philadelphia, PA	L.R.	Using ATM card and PIN of L.R. to deposit a fraudulent check in the amount of \$1,317 into PSECU account of L.R.
5/19/15	ATM located at Citizens Bank, 1501 N. Broad St., Philadelphia, PA	K.Y.S.	Using ATM card and PIN of K.Y.S. to deposit a fraudulent check in the amount of \$2,900 into PSECU account of K.Y.S.
5/19/15	ATM located at Citizens Bank, 1501 N. Broad St., Philadelphia, PA	K.Y.S.	Using ATM card and PIN of K.Y.S. to withdraw approximately \$303.50 from PSECU account of K.Y.S.
5/19/15	Walmart store located at 2101 Blair Mill Road, Willow Grove, PA	K.Y.S.	Using ATM card and PIN of K.Y.S. to purchase goods and obtain cash totaling approximately \$795.72 from PSECU account of K.Y.S.
5/20/15	Walmart store located at 1 Franklin Mills Blvd., Philadelphia, PA	K.Y.S.	Using ATM card and PIN of K.Y.S. to purchase goods and obtain cash totaling approximately \$668.80 from PSECU account of K.Y.S.
5/20/15	CVS store located at 6501 Harbison Rd. Philadelphia, PA	K.Y.S.	Using ATM card and PIN of K.Y.S. to purchase goods and obtain cash totaling approximately \$385.38 from PSECU account of K.Y.S.
5/27/15	ATM located at PNC Bank, 1501 N. Broad St., Philadelphia, PA	D.C.	Using ATM card and PIN of D.C. to deposit a fraudulent check in the amount of \$5,200 into PSECU account of D.C.
5/27/15	ATM located at Sunoco, 2634-44 N. Broad St. Philadelphia, PA	D.C.	Using ATM card and PIN of D.C. to withdraw approximately \$203 from PSECU account of D.C.
5/27/15	ATM located at Sunoco, 2634-44 N. Broad St. Philadelphia, PA	D.C.	Using ATM card and PIN of D.C. to withdraw approximately \$101.50 from PSECU account of D.C.
5/27/15	Walmart store located at 1675 S. Columbus Blvd., Philadelphia, PA	D.C.	Using ATM card and PIN of D.C. to purchase goods and obtain cash totaling approximately \$610.20 from PSECU account of D.C.

<b><u>Date</u></b>	<b><u>Location</u></b>	<b><u>PSECU Account Holder</u></b>	<b><u>Fraudulent Transactions</u></b>
5/27/15	Shoe Plus Store located in Philadelphia, PA	D.C.	Using ATM card and PIN of D.C. to purchase goods and obtain cash totaling approximately \$100 from PSECU account of D.C.
5/28/15	ATM located at 9218 Frankford Ave., Philadelphia, PA	B.R.	Using ATM card and PIN of B.R. to deposit a fraudulent check in the amount of \$5,000 into PSECU account of B.R.
5/28/15	ATM located at 9218 Frankford Ave, Philadelphia, PA	B.R.	Using ATM card and PIN of B.R. to withdraw approximately \$203.50 from PSECU account of B.R.
5/28/15	Walmart store located at 9745 Roosevelt Blvd. in Philadelphia, PA	B.R.	Using ATM card and PIN of B.R. to purchase goods and obtain cash totaling approximately \$1,422.77 from PSECU account of B.R.
5/28/15	ATM located at Citizens Bank, 2942 N. 22 <sup>nd</sup> St., Philadelphia, PA	S.N.	Using ATM card and PIN of S.N. to deposit a fraudulent check in the amount of \$5,300 into PSECU account of S.N.
5/28/15	Walmart store located at 1675 S. Columbus Blvd., Philadelphia, PA	S.N.	Using ATM card and PIN of S.N. to purchase goods and obtain cash totaling approximately \$605.59 from PSECU account of S.N.
5/28/15	Fresh Grocer store located at 1501 N. Broad St. Philadelphia, PA	S.N.	Using ATM card and PIN of S.N. to purchase goods and obtain cash totaling approximately \$157.63 from PSECU account of S.N.
5/28/15	ATM located at Citizens Bank, 2942 N. 22 <sup>nd</sup> St., Philadelphia, PA	S.N.	Using ATM card and PIN of S.N. to withdraw approximately \$203.50 from PSECU account of S.N.
6/1/15	ATM located at Citizens Bank, 134 S. 34 <sup>th</sup> St., Philadelphia, PA	M.H.	Using ATM card and PIN of M.H. to deposit a fraudulent check in the amount of \$4,900 into PSECU account of M.H.
6/1/15	ATM located at 7-Eleven, 3440 Market St. Philadelphia, PA	M.H.	Using ATM card and PIN of M.H. to withdraw approximately \$400 from PSECU account of M.H.
6/1/15	ATM located at 7-Eleven, 3440 Market St. Philadelphia, PA	M.H.	Using ATM card and PIN of M.H. to withdraw approximately \$100 from PSECU account of M.H.
6/1/15	Walmart store located at 2101 Blair Mill Road, Willow Grove, PA	M.H.	Using ATM card and PIN of M.H. to purchase goods and obtain cash totaling approximately \$1,327.73 from PSECU account of M.H.
6/2/15	Macy's store located at 2500 W. Moreland Rd, Willow Grove, PA	M.H.	Using ATM card and PIN of M.H. to purchase goods and obtain cash totaling approximately \$143.10 from PSECU account of M.H.

<b><u>Date</u></b>	<b><u>Location</u></b>	<b><u>PSECU Account Holder</u></b>	<b><u>Fraudulent Transactions</u></b>
6/8/15	ATM located at Citizens Bank, 134 S. 34 <sup>th</sup> St., Philadelphia, PA	F.G.	Using ATM card and PIN of F.G. to deposit a fraudulent check in the amount of \$7,200 into PSECU account of F.G.
6/8/15	ATM located at Citizens Bank, 134 S. 34 <sup>th</sup> St., Philadelphia, PA	F.G.	Using ATM card and PIN of F.G. to withdraw approximately \$203.50 from PSECU account of F.G.
6/8/15	CVS store located at 3925 Walnut St., Philadelphia, PA	F.G.	Using ATM card and PIN of F.G. to withdraw approximately \$103 from PSECU account of F.G.
6/8/15	Walmart store located at 1675 S. Columbus Blvd., Philadelphia, PA	F.G.	Using ATM card and PIN of F.G. to purchase goods and obtain cash totaling approximately \$655.36 from PSECU account of F.G.
6/8/15	Fresh Grocer store located at 4001 Walnut St., Philadelphia, PA	F.G.	Using ATM card and PIN of F.G. to purchase goods and obtain cash totaling approximately \$93.43 from PSECU account of F.G.
6/15/15	ATM located at Citizens Bank, 1501 N. Broad St., Philadelphia, PA	R.G.	Using ATM card and PIN of R.G. to deposit a fraudulent check in the amount of \$8,000 into PSECU account of R.G.
6/15/15	ATM located at Citizens Bank, 1501 N. Broad St., Philadelphia, PA	R.G.	Using ATM card and PIN of R.G. to withdraw approximately \$203.50 from PSECU account of R.G.
6/15/15	Walmart store located at 1675 S. Columbus Blvd., Philadelphia, PA	R.G.	Using ATM card and PIN of R.G. to purchase goods and obtain cash totaling approximately \$712.18 from PSECU account of R.G.
6/15/15	Home Depot store located in Philadelphia, PA	R.G.	Using ATM card and PIN of R.G. to purchase goods and obtain cash totaling approximately \$76.95 from PSECU account of R.G.
6/16/15	ATM located at Citizens Bank, 1501 N. Broad St., Philadelphia, PA	T.I.	Using ATM card and PIN of T.I. to deposit a fraudulent check in the amount of \$4,200 into PSECU account of T.I.
6/16/15	ATM located at Citizens Bank, 1501 N. Broad St., Philadelphia, PA	T.I.	Using ATM card and PIN of T.I. to withdraw approximately \$203.50 from PSECU account of T.I.
6/16/15	ATM located at Citizens Bank, 1501 N. Broad St., Philadelphia, PA	T.I.	Using ATM card and PIN of T.I. to withdraw approximately \$203.50 from PSECU account of T.I.
6/16/15	Walmart store located at 4600 Roosevelt Blvd., Philadelphia, PA	T.I.	Using ATM card and PIN of T.I. to purchase goods and obtain cash totaling approximately \$1,099 from PSECU account of T.I.

<u>Date</u>	<u>Location</u>	<u>PSECU Account Holder</u>	<u>Fraudulent Transactions</u>
6/16/15	Home Depot store located at 4640 Roosevelt Blvd., Philadelphia, PA	T.I.	Using ATM card and PIN of T.I. to purchase goods and obtain cash totaling approximately \$314.46 from PSECU account of T.I.
6/17/15	Rite Aid store located at 10 Snyder Ave., Philadelphia, PA	T.I.	Using ATM card and PIN of T.I. to purchase goods and obtain cash totaling approximately \$41.39 from PSECU account of T.I.
6/17/15	ATM located at Alvarez Grocer Store, 1901 S 5 <sup>th</sup> St., Philadelphia, PA	T.I.	Using ATM card and PIN of T.I. to withdraw approximately \$325.97 from PSECU account of T.I.
6/25/15	ATM located at Citizens Bank, 6324 Stenton Ave., Philadelphia, PA	K.M.	Using ATM card and PIN of K.M. to deposit a fraudulent check in the amount of \$2,900 into PSECU account of K.M.
6/25/15	ATM located at Citizens Bank, 6324 Stenton Ave., Philadelphia, PA	K.M.	Using ATM card and PIN of K.M. to withdraw approximately \$203.50 from PSECU account of K.M.
6/25/15	ATM located at Citizens Bank, 6324 Stenton Ave., Philadelphia, PA	K.M.	Using ATM card and PIN of K.M. to withdraw approximately \$203.50 from PSECU account of K.M.
6/25/15	ATM located at Citizens Bank, 6324 Stenton Ave., Philadelphia, PA	K.M.	Using ATM card and PIN of K.M. to withdraw approximately \$103.50 from PSECU account of K.M.
6/25/15	Walmart store located at 2101 Blair Mill Road, Willow Grove, PA	K.M.	Using ATM card and PIN of K.M. to purchase goods and obtain cash totaling approximately \$1,071.23 from PSECU account of K.M.
6/25/15	Sunoco gas station located at 7900 Ogontz Ave., Philadelphia, PA	K.M.	Using ATM card and PIN of K.M. to purchase goods and obtain cash totaling approximately \$30.68 from PSECU account of K.M.
6/25/15	Nordstrom store located at 2500 W. Moreland Rd. Willow Grove, PA	K.M.	Using ATM card and PIN of K.M. to purchase goods and obtain cash totaling approximately \$102.79 from PSECU account of K.M.
6/25/15	Chick-Fil-A restaurant located at 2421 Cheltenham Ave, Philadelphia, PA	K.M.	Using ATM card and PIN of K.M. to purchase goods and obtain cash totaling approximately \$17.69 from PSECU account of K.M.
7/8/15	ATM located at Citizens Bank, 5607 Vine St., Philadelphia, PA	K.W.	Using ATM card and PIN of K.W. to deposit a fraudulent check in the amount of \$4,200 into PSECU account of K.W.

<b><u>Date</u></b>	<b><u>Location</u></b>	<b><u>PSECU Account Holder</u></b>	<b><u>Fraudulent Transactions</u></b>
7/8/15	ATM located at Citizens Bank, 5607 Vine St., Philadelphia, PA	K.W.	Using ATM card and PIN of K.W. to withdraw approximately \$203.50 from PSECU account of K.W.
7/8/15	ATM located at Citizens Bank, 5607 Vine St., Philadelphia, PA	K.W.	Using ATM card and PIN of K.W. to withdraw approximately \$203.50 from PSECU account of K.W.
7/8/15	Walmart store located at 2101 Blair Mill Road, Willow Grove, PA	K.W.	Using ATM card and PIN of K.W. to purchase goods and obtain cash totaling approximately \$1,122.31 from PSECU account of K.W.
7/8/15	BP Gas Station located at 1474 Old York Rd, Abington, PA	K.W.	Using ATM card and PIN of K.W. to purchase goods and obtain cash totaling approximately \$33.68 from PSECU account of K.W.
7/8/15	Olympia Sports store	K.W.	Using ATM card and PIN of K.W. to purchase goods and obtain cash totaling approximately \$255 from PSECU account of K.W.
7/20/15	ATM located at Citizens Bank, 2001 S. Broad St., Philadelphia, PA	L.A.	Using ATM card and PIN of L.A. to deposit a fraudulent check in the amount of \$5,000 into PSECU account of L.A.
7/20/15	ATM located at Citizens Bank, 2001 S. Broad St., Philadelphia, PA	L.A.	Using ATM card and PIN of L.A. to withdraw approximately \$203.50 from PSECU account of L.A.
7/20/15	ATM located at Citizens Bank, 2001 S. Broad St., Philadelphia, PA	L.A.	Using ATM card and PIN of L.A. to withdraw approximately \$203.50 from PSECU account of L.A.
7/20/15	Walmart Supercenter store in Philadelphia, PA	L.A.	Using ATM card and PIN of L.A. to purchase goods and obtain cash totaling approximately \$1,254.06 from PSECU account of L.A.
7/21/15	ATM located at 1548 S. Corlies St., Philadelphia, PA	L.A.	Using ATM card and PIN of L.A. to withdraw approximately \$51.75 from PSECU account of L.A.
7/21/15	ATM located at 1548 S. Corlies St., Philadelphia, PA	L.A.	Using ATM card and PIN of L.A. to withdraw approximately \$357 from PSECU account of L.A.
7/21/15	ATM located at Citizens Bank, 5500 Germantown Ave., Philadelphia, PA	T.D.	Using ATM card and PIN of T.D. to deposit a fraudulent check in the amount of \$5,000 into PSECU account of T.D.



<b><u>Date</u></b>	<b><u>Location</u></b>	<b><u>PSECU Account Holder</u></b>	<b><u>Fraudulent Transactions</u></b>
7/21/15	ATM located at Citizens Bank, 5500 Germantown Ave., Philadelphia, PA	T.D.	Using ATM card and PIN of T.D. to withdraw approximately \$203.50 from PSECU account of T.D.
7/21/15	Walmart Supercenter store in Willow Grove, PA	T.D.	Using ATM card and PIN of T.D. to purchase goods and obtain cash totaling approximately \$260.86 from PSECU account of T.D.
7/21/15	ATM located at N. 22 <sup>nd</sup> St. in Philadelphia, PA	Y.T.	Using ATM card and PIN of Y.T. to deposit a fraudulent check in the amount of \$4,200 into PSECU account of Y.T.
7/21/15	ATM located at N. 22 <sup>nd</sup> St. in Philadelphia, PA	Y.T.	Using ATM card and PIN of Y.T. to withdraw approximately \$203.50 from PSECU account of Y.T.
7/21/15	Walmart Supercenter store in Philadelphia, PA	Y.T.	Using ATM card and PIN of Y.T. to purchase goods and obtain cash totaling approximately \$784.32 from PSECU account of Y.T.
7/21/15	ATM located at Citizens Bank, 1234 Market St., Philadelphia, PA	T.Y.	Using ATM card and PIN of T.Y. to deposit five fraudulent checks in the amounts of \$3,850, \$4,200, \$4000, \$3800, and \$2750 into PSECU account of T.Y.
7/21/15	Rite Aid pharmacy located at 2131 N. Broad Street, Philadelphia, PA	T.Y.	Using ATM card and PIN of T.Y. to purchase goods and obtain cash totaling approximately \$811.45 from PSECU account of T.Y.
7/21/15	ATM located in Philadelphia, PA	T.Y.	Using ATM card and PIN of T.Y. to withdraw approximately \$83 from PSECU account of T.Y.
7/21/15	ATM located at in Philadelphia, PA	T.Y.	Using ATM card and PIN of T.Y. to withdraw approximately \$203 from PSECU account of T.Y.
7/24/15	ATM located at Citizens Bank, 6201 N. 5 <sup>th</sup> St., Philadelphia, PA	D.S.	Using ATM card and PIN of D.S. to deposit a fraudulent check in the amount of \$5,000 into PSECU account of D.S.
7/24/15	ATM located at Citizens Bank, 6201 N. 5 <sup>th</sup> St., Philadelphia, PA	D.S.	Using ATM card and PIN of D.S. to withdraw approximately \$203.50 from PSECU account of D.S.
7/24/15	Walmart store located at 2101 Blair Mill Road, Willow Grove, PA	D.S.	Using ATM card and PIN of D.S. to purchase goods and obtain cash totaling approximately \$356.54 from PSECU account of D.S.

<b><u>Date</u></b>	<b><u>Location</u></b>	<b><u>PSECU Account Holder</u></b>	<b><u>Fraudulent Transactions</u></b>
7/25/15	Walmart store located in Philadelphia, PA	D.S.	Using ATM card and PIN of D.S. to purchase goods and obtain cash totaling approximately \$289.67 from PSECU account of D.S.
7/24/15	ATM located at United Bank of Philadelphia, 3750 Lancaster Ave., Philadelphia, PA	D.S.	Using ATM card and PIN of D.S. to withdraw approximately \$302.75 from PSECU account of D.S.
7/29/15	ATM located at Citizens Bank, 4700 Frankford Ave., Philadelphia, PA	A.H.	Using ATM card and PIN of A.H. to deposit a fraudulent check in the amount of \$2,200 into PSECU account of A.H.
7/29/15	ATM located at Citizens Bank, 4700 Frankford Ave., Philadelphia, PA	A.H.	Using ATM card and PIN of A.H. to withdraw approximately \$203.50 from PSECU account of A.H.
7/29/15	Walmart store located at 9745 Roosevelt Blvd., Philadelphia, PA	A.H.	Using ATM card and PIN of A.H. to purchase goods and obtain cash totaling approximately \$291.80 from PSECU account of A.H.
7/29/15	Rite Aid located at 9745 Roosevelt Blvd., Philadelphia, PA	A.H.	Using ATM card and PIN of A.H. to purchase goods and obtain cash totaling approximately \$86.50 from PSECU account of A.H.
7/29/15	ATM located at United Bank of Philadelphia, 3750 Lancaster Ave., Philadelphia, PA	A.H.	Using ATM card and PIN of D.S. to withdraw approximately \$202.75 from PSECU account of D.S.
7/29/15	ATM located at United Bank of Philadelphia, 3750 Lancaster Ave., Philadelphia, PA	A.H.	Using ATM card and PIN of D.S. to withdraw approximately \$102.75 from PSECU account of D.S.
8/3/15	ATM located at Citizens Bank, 1501 N. Broad St., Philadelphia, PA	S.C.	Using ATM card and PIN of S.C. to deposit a fraudulent check in the amount of \$3,100 into PSECU account of S.C.
8/3/15	ATM located at Sunoco 1300 N. Broad St., Philadelphia, PA	S.C.	Using ATM card and PIN of S.C. to withdraw approximately \$201.50 from PSECU account of S.C.
8/3/15	ATM located at Sunoco 1300 N. Broad St., Philadelphia, PA	S.C.	Using ATM card and PIN of S.C. to withdraw approximately \$201.50 from PSECU account of S.C.
8/3/15	Sunoco 1300 N Broad St. Philadelphia, PA	S.C.	Using ATM card and PIN of S.C. to purchase goods and obtain cash totaling approximately \$47.56 from PSECU account of S.C.

<b><u>Date</u></b>	<b><u>Location</u></b>	<b><u>PSECU Account Holder</u></b>	<b><u>Fraudulent Transactions</u></b>
8/3/15	Walmart store located at 4600 Roosevelt Blvd., Philadelphia, PA	S.C.	Using ATM card and PIN of S.C. to purchase goods and obtain cash totaling approximately \$864.56 from PSECU account of S.C.
8/3/15	Pathmark Store located at 2900 N Broad St. Philadelphia, PA	S.C.	Using ATM card and PIN of S.C. to purchase goods and obtain cash totaling approximately \$102.75 from PSECU account of S.C.
8/4/15	Pathmark Store located at 2900 N. Broad St. Philadelphia, PA	S.C.	Using ATM card and PIN of S.C. to purchase goods and obtain cash totaling approximately \$102.58 from PSECU account of S.C.
8/4/15	Villa Store in Philadelphia, PA	S.C.	Using ATM card and PIN of S.C. to purchase goods and obtain cash totaling approximately \$260 from PSECU account of S.C.
8/7/15	ATM located at Citizens Bank, 1501 N. Broad St., Philadelphia, PA	R.H.	Using ATM card and PIN of R.H. to deposit a fraudulent check in the amount of \$5,000 into PSECU account of R.H.
8/7/15	ATM located at Citizens Bank, 1501 N. Broad St., Philadelphia, PA	R.H.	Using ATM card and PIN of R.H. to withdraw approximately \$203.50 from PSECU account of R.H.
8/7/15	ATM located at Sunoco, 2634-44 N. Broad St. Philadelphia, PA	R.H.	Using ATM card and PIN of R.H. to withdraw approximately \$201.50 from PSECU account of R.H.
8/7/15	Walmart store located at 4600 Roosevelt Blvd., Philadelphia, PA	R.H.	Using ATM card and PIN of R.H. to purchase goods and obtain cash totaling approximately \$717.33 from PSECU account of R.H.
8/10/15	ATM located at Citizens Bank, 2942 N.22 <sup>nd</sup> St., Philadelphia, PA	F.D.	Using ATM card and PIN of F.D. to deposit a fraudulent check in the amount of \$5,000 into PSECU account of F.D.
8/10/15	ATM located at Citizens Bank, 2942 N.22 <sup>nd</sup> St., Philadelphia, PA	F.D.	Using ATM card and PIN of F.D. to withdraw approximately \$203.50 from PSECU account of F.D.
8/10/15	Walmart store located at 4600 Roosevelt Blvd., Philadelphia, PA	F.D.	Using ATM card and PIN of F.D. to purchase goods and obtain cash totaling approximately \$207.52 from PSECU account of F.D.
8/10/15	Shoprite Store located at 2800 Fox St., Philadelphia, PA	F.D.	Using ATM card and PIN of F.D. to purchase goods and obtain cash totaling approximately \$200.54 from PSECU account of F.D.
8/10/15	ATM located at 1548 S. Corlies St., Philadelphia, PA	F.D.	Using ATM card and PIN of F.D. to withdraw approximately \$201.75 from PSECU account of F.D.

<b><u>Date</u></b>	<b><u>Location</u></b>	<b><u>PSECU Account Holder</u></b>	<b><u>Fraudulent Transactions</u></b>
8/10/15	ATM located at 1548 S. Corlies St., Philadelphia, PA	F.D.	Using ATM card and PIN of F.D. to withdraw approximately \$101.75 from PSECU account of F.D.
8/25/15	ATM located at Citizens Bank, 1501 N. Broad St., Philadelphia, PA	F.B.	Using ATM card and PIN of F.B. to deposit a fraudulent check in the amount of \$5,000 into PSECU account of F.B.
8/25/15	ATM located at Citizens Bank, 1501 N. Broad St., Philadelphia, PA	F.B.	Using ATM card and PIN of F.B. to withdraw approximately \$203.50 from PSECU account of F.B.
8/27/15	Shoprite Supermarket located at 2800 Fox St., Philadelphia, PA	F.B.	Using ATM card and PIN of F.B. to purchase goods and obtain cash totaling approximately \$216.25 from PSECU account of F.B.
8/25/15	ATM located at American Heritage Federal Credit Union ("AHFCU"), 2800 Fox St., Philadelphia, PA	F.B.	Using ATM card and PIN of F.B. to withdraw approximately \$100 from PSECU account of F.B.
8/25/15	Sunoco located at 2634 N. Broad St., Philadelphia, PA	F.B.	Using ATM card and PIN of F.B. to purchase goods and obtain cash totaling approximately \$13.95 from PSECU account of F.B.
8/27/15	Kicks USA store located at 3450 Fox St., Philadelphia, PA	F.B.	Using ATM card and PIN of F.B. to purchase goods and obtain cash totaling approximately \$565 from PSECU account of F.B.
8/27/15	ATM located at AHFCU, 2620 W. Hunting Park Ave., Philadelphia, PA	B.H.	Using ATM card and PIN of B.H. to deposit a fraudulent check in the amount of \$5,000 into PSECU account of B.H.
8/27/15	ATM located at AHFCU, 2800 Fox St., Philadelphia, PA	B.H.	Using ATM card and PIN of B.H. to withdraw approximately \$500 from PSECU account of B.H.
8/27/15	Walmart store located at 4600 Roosevelt Blvd., Philadelphia, PA	B.H.	Using ATM card and PIN of B.H. to purchase goods and obtain cash totaling approximately \$1,249.73 from PSECU account of B.H.
8/27/15	ATM located at Police and Fire Federal Credit Union, 2201 Hunting Park, Philadelphia, PA	B.H.	Using ATM card and PIN of B.H. to withdraw approximately \$200 from PSECU account of B.H.

<u>Date</u>	<u>Location</u>	<u>PSECU Account Holder</u>	<u>Fraudulent Transactions</u>
8/27/15	ATM located at Police and Fire Federal Credit Union, 2201 Hunting Park, Philadelphia, PA	B.H.	Using ATM card and PIN of B.H. to withdraw approximately \$300 from PSECU account of B.H.
8/28/15	Walmart store located at 4600 Roosevelt Blvd., Philadelphia, PA	B.H.	Using ATM card and PIN of B.H. to purchase goods and obtain cash totaling approximately \$301.96 from PSECU account of B.H.
8/28/15	Kicks USA store located at 3450 Fox St., Philadelphia, PA	B.H.	Using ATM card and PIN of B.H. to purchase goods and obtain cash totaling approximately \$244.99 from PSECU account of B.H.
8/27/15	ATM located at AHFCU, 2620 W. Hunting Park Ave., Philadelphia, PA	S.E.	Using ATM card and PIN of S.E. to deposit a fraudulent check in the amount of \$5,000 into PSECU account of S.E.
8/27/15	ATM located at AHFCU, 2800 Fox St., Philadelphia, PA	S.E.	Using ATM card and PIN of S.E. to withdraw approximately \$300 from PSECU account of S.E.
8/27/15	ATM located at AHFCU, 2800 Fox St., Philadelphia, PA	S.E.	Using ATM card and PIN of S.E. to withdraw approximately \$200 from PSECU account of S.E.
8/27/15	Walmart store located at 4600 Roosevelt Blvd., Philadelphia, PA	S.E.	Using ATM card and PIN of S.E. to purchase goods and obtain cash totaling approximately \$975.62 from PSECU account of S.E.
8/27/15	ATM located at Police and Fire Federal Credit Union, 220S1 Hunting Park, Philadelphia, PA	S.E.	Using ATM card and PIN of S.E. to withdraw approximately \$400 from PSECU account of S.E.
8/27/15	ATM located at Police and Fire Federal Credit Union, 2201 Hunting Park, Philadelphia, PA	S.E.	Using ATM card and PIN of S.E. to withdraw approximately \$100 from PSECU account of S.E.
8/28/15	Kicks USA store located at 3450 Fox St. Philadelphia, PA	S.E.	Using ATM card and PIN of S.E. to purchase goods and obtain cash totaling approximately \$480 from PSECU account of S.E.

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

**COUNTS TWO THROUGH NINE**

**THE GRAND JURY FURTHER CHARGES THAT:**

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

**AARON DASHAWN CAPLE**

knowingly and without lawful authority, possessed and used, and aided and abetted the possession and use of, a means of identification of another person, that is, the name, automated teller machine card, and personal identification number 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>PSECU Account Holder</u></b>
TWO	11/16/14	L.R.
THREE	5/19/15	K.Y.S.
FOUR	5/28/15	B.R.
FIVE	7/8/15	K.W.
SIX	7/20/15	L.A.
SEVEN	7/24/15	D.S.
EIGHT	8/27/15	B.H.
NINE	8/27/15	S.E.

In violation of Title 18, United States Code, Sections 1028A(a)(1), (c)(5), and 2.

## **COUNT TEN**

### **THE GRAND JURY FURTHER CHARGES THAT:**

1. At all times material to this indictment, TD Bank was a financial institution whose deposits were insured by the Federal Deposit Insurance Corporation, Certificate Number 18409.

2. From in or about March 2015, through in or about September 2015, in the Eastern District of Pennsylvania and elsewhere, defendant

### **AARON DASHAWN CAPLE**

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

### **THE SCHEME**

3. Paragraphs 3 through 12 of Count One of the Indictment are incorporated by reference herein as though fully set forth.

4. In furtherance of the scheme, on or about the following dates, in the Eastern District of Pennsylvania and elsewhere, defendant AARON DASHWAN CAPLE used and caused to be used account numbers, ATM cards, and PINs of TD Bank account holders to make fraudulent check deposits into and fraudulent withdrawals from the TD Bank account holders' accounts, including the following:

<u>Date</u>	<u>Location</u>	<u>TD Bank Account Holder</u>	<u>Fraudulent Transactions</u>
3/12/15	ATM located at TD Bank, 3735 Walnut St., Philadelphia, PA	S.N.W.	Using ATM card and PIN of S.N.W. to deposit a fraudulent check in the amount of \$1,200 into TD Bank savings account of S.N.W.
3/12/15	ATM located at TD Bank, 3735 Walnut St., Philadelphia, PA	S.N.W.	Using ATM card and PIN of S.N.W. to deposit a fraudulent check in the amount of \$900 into TD Bank checking account of S.N.W.
3/12/15	ATM located at TD Bank, 217 W. Lehigh Ave., Philadelphia, PA	J.R.R.	Using ATM card and PIN of J.R.R. to deposit a fraudulent check in the amount of \$2,300, into TD Bank checking account of J.R.R.
3/12/15	ATM located at TD Bank, 217 W. Lehigh Ave., Philadelphia, PA	J.R.R.	Using ATM card and PIN of J.R.R. to withdraw approximately \$100 from TD Bank checking account of J.R.R.
3/13/15	ATM located near 10 <sup>th</sup> Street and Walnut Street, Philadelphia, PA	J.R.R.	Using ATM card and PIN of J.R.R. to withdraw approximately \$203 from TD Bank checking account of J.R.R.
3/13/15	ATM located at 800 Walnut Street, Philadelphia, PA	J.R.R.	Using ATM card and PIN of J.R.R. to withdraw approximately \$202 from TD Bank checking account of J.R.R.
3/13/15	ATM located on Chestnut Street in Philadelphia, PA	J.R.R.	Using ATM card and PIN of J.R.R. to withdraw approximately \$83 from TD Bank checking account of J.R.R.
3/13/15	Lukoil gas station located at 600 N. Delaware Ave., Philadelphia, PA	J.R.R.	Using ATM card and PIN of J.R.R. to purchase goods totaling approximately \$14 from TD Bank checking account of J.R.R.
3/14/15	ATM located at TD Bank, 3735 Walnut St., Philadelphia, PA	T.S.S.	Using ATM card and PIN of T.S.S. to deposit a fraudulent check in the amount of \$400 into TD Bank savings account of T.S.S.
3/14/15	ATM located at TD Bank, 3735 Walnut St., Philadelphia, PA	T.S.S.	Using ATM card and PIN of T.S.S. to deposit a fraudulent check in the amount of \$1,200 into TD Bank checking account of T.S.S.
3/16/15	ATM located at TD Bank, 1235 Blackwood-Clementon Road, Clementon, NJ	R.T.C.	Using ATM card and PIN of R.T.C. to deposit a fraudulent check in the amount of \$1,400 into TD Bank checking account of R.T.C.



<b><u>Date</u></b>	<b><u>Location</u></b>	<b><u>TD Bank Account Holder</u></b>	<b><u>Fraudulent Transactions</u></b>
3/17/15	ATM located at TD Bank, 217 W. Lehigh Ave., Philadelphia, PA	M.L.T.	Using ATM card and PIN of M.L.T. to deposit a fraudulent check in the amount of \$1,100 into TD Bank checking account of M.L.T.
3/17/15	ATM located at 201 W. Lehigh Ave., Philadelphia, PA	M.L.T.	Using ATM card and PIN of M.L.T. to withdraw approximately \$112 from TD Bank checking account of M.L.T.
3/17/15	ATM located at TD Bank, 3735 Walnut St., Philadelphia, PA	T.T.S.	Using ATM card and PIN of T.T.S. to deposit a fraudulent check in the amount of \$1,200 into TD Bank savings account of T.T.S.
3/24/15	ATM located at TD Bank, 1726 Walnut St., Philadelphia, PA	A.M.F.	Using ATM card and PIN of A.M.F. to deposit a fraudulent check in the amount of \$2,500 into TD Bank checking account of A.M.F.
3/24/15	ATM located at TD Bank, 217 W. Lehigh Ave., Philadelphia, PA	A.M.F.	Using ATM card and PIN of A.M.F. to deposit a fraudulent check in the amount of \$900 into TD Bank savings account of A.M.F.
3/24/15	ATM located at TD Bank, 501 Mickel Blvd., Camden, NJ	A.M.F.	Using ATM card and PIN of A.M.F. to withdraw approximately \$300 from TD Bank checking account of A.M.F.
3/24/15	ATM located at TD Bank, 501 Mickel Blvd., Camden, NJ	A.M.F.	Using ATM card and PIN of A.M.F. to withdraw approximately \$100 from TD Bank checking account of A.M.F.
3/24/15	ATM located at TD Bank, 501 Mickel Blvd., Camden, NJ	A.M.F.	Using ATM card and PIN of A.M.F. to withdraw approximately \$20 from TD Bank checking account of A.M.F.
3/24/15	ATM located at TD Bank, 501 Mickel Blvd., Camden, NJ	A.M.F.	Using ATM card and PIN of A.M.F. to withdraw approximately \$20 from TD Bank checking account of A.M.F.
3/24/15	ATM located at TD Bank, 217 W. Lehigh Ave., Philadelphia, PA	P.A.	Using ATM card and PIN of P.A. to deposit a fraudulent check in the amount of \$1,200 into TD Bank savings account of P.A.
3/24/15	ATM located at TD Bank, 217 W. Lehigh Ave., Philadelphia, PA	P.A.	Using ATM card and PIN of P.A. to withdraw approximately \$100 from TD Bank savings account of P.A.
3/25/15	ATM located at 1630 W. Girard Ave., Philadelphia, PA	P.A.	Using ATM card and PIN of P.A. to withdraw approximately \$201.50 from TD Bank savings account of P.A.

<u>Date</u>	<u>Location</u>	<u>TD Bank Account Holder</u>	<u>Fraudulent Transactions</u>
3/25/15	ATM located at 1630 W. Girard Ave., Philadelphia, PA	P.A.	Using ATM card and PIN of P.A. to withdraw approximately \$501.50 from TD Bank savings account of P.A.
4/15/15	ATM located at TD Bank, 4020 City Line Ave., Philadelphia, PA	K.R.K.	Using ATM card and PIN of K.R.K. to deposit a fraudulent check in the amount of \$900 into TD Bank checking account of K.R.K.
4/15/15	ATM located at TD Bank, 4020 City Line Ave., Philadelphia, PA	K.R.K.	Using ATM card and PIN of K.R.K. to deposit a fraudulent check in the amount of \$3,400 into TD Bank savings account of K.R.K.
4/15/15	ATM located at TD Bank, 4020 City Line Ave., Philadelphia, PA	K.R.K.	Using ATM card and PIN of K.R.K. to withdraw approximately \$240 from TD Bank checking account of K.R.K.
4/16/15	Via telephone	K.R.K.	Causing the transfer \$2,900 via telephone from K.R.K.'s savings account into K.R.K.'s checking account
4/16/15	ATM located TD Bank, 3735 Walnut Street, Philadelphia, PA	K.R.K.	Using ATM card and PIN of K.R.K. to check balance of TD Bank checking account of K.R.K.
4/16/15	ATM located at 3750 Lancaster Ave., Philadelphia, PA	K.R.K.	Using ATM card and PIN of K.R.K. to withdraw approximately \$302.75 from TD Bank checking account of K.R.K. ending in 4403.
4/16/15	ATM located at 1850 Columbus Blvd., Philadelphia, PA	K.R.K.	Using ATM card and PIN of K.R.K. to withdraw approximately \$121.75 from TD Bank checking account of K.R.K.
4/16/15	Fresh Grocer store located on Walnut Street in Philadelphia, PA	K.R.K.	Using ATM card and PIN of K.R.K. to purchase goods and obtain cash totaling approximately \$188.70 from TD Bank checking account of K.R.K.
4/16/15	ATM located at 4001 Walnut Street, Philadelphia, PA	K.R.K.	Using ATM card and PIN of K.R.K. to withdraw approximately \$22.75 from TD Bank checking account of K.R.K.
4/23/15	ATM located at TD Bank, 2385 Cheltenham Ave., Philadelphia, PA	K.R.K.	Using ATM card and PIN of K.R.K. to withdraw approximately \$700 from TD Bank checking account of K.R.K.

<u>Date</u>	<u>Location</u>	<u>TD Bank Account Holder</u>	<u>Fraudulent Transactions</u>
4/24/15	ATM located at 5301 Chew Ave., Philadelphia, PA	K.R.K.	Using ATM card and PIN of K.R.K. to withdraw approximately \$602.50 from TD Bank checking account of K.R.K.
4/30/15	ATM located at TD Bank, 1500 John F. Kennedy Blvd., Philadelphia, PA	M.G.	Using ATM card and PIN of M.G. to deposit a fraudulent check in the amount of \$1,900 into TD Bank checking account of M.G.
4/30/15	ATM located at TD Bank, 1500 John F. Kennedy Blvd., Philadelphia, PA	M.G.	Using ATM card and PIN of M.G. to withdraw approximately \$100 from TD Bank checking account of M.G.
4/30/15	ATM located at TD Bank, 2385 Cheltenham Ave., Philadelphia, PA	B.C.	Using ATM card and PIN of B.C. to deposit a fraudulent check in the amount of \$2,700 into TD Bank checking account of B.C.
4/30/15	ATM located at 5637 Chew Ave., Philadelphia, PA	B.C.	Using ATM card and PIN of B.C. to withdraw approximately \$121.95 from TD Bank checking account of B.C.
5/1/15	ATM located at 742 N. 38 <sup>th</sup> St., Philadelphia, PA	B.C.	Using ATM card and PIN of B.C. to withdraw approximately \$101.75 from TD Bank checking account of B.C.
5/1/15	ATM located at 1339 W. Olney Ave., Philadelphia, PA	B.C.	Using ATM card and PIN of B.C. to withdraw approximately \$61.75 from TD Bank checking account of B.C. ending in 6783.
5/1/15	ATM located at 1339 W. Olney Ave., Philadelphia, PA	B.C.	Using ATM card and PIN of B.C. to withdraw approximately \$51.75 from TD Bank checking account of B.C.
5/1/15	ATM located at 5900 N. Broad St., Philadelphia, PA	M.G.	Using ATM card and PIN of M.G. to withdraw approximately \$303.50 from TD Bank checking account of M.G.
5/1/15	ATM located at 5900 N. Broad St., Philadelphia, PA	M.G.	Using ATM card and PIN of M.G. to withdraw approximately \$203.50 from TD Bank checking account of M.G.
5/1/15	ATM located at 5900 N. Broad St., Philadelphia, PA	M.G.	Using ATM card and PIN of M.G. to withdraw approximately \$201.50 from TD Bank checking account of M.G.
5/1/15	Walmart store located at 2101 Blair Mill Road, Willow Grove, PA	M.G.	Using ATM card and PIN of M.G. to purchase goods and obtain cash totaling approximately \$510.57 from TD Bank checking account of M.G.

<b><u>Date</u></b>	<b><u>Location</u></b>	<b><u>TD Bank Account Holder</u></b>	<b><u>Fraudulent Transactions</u></b>
5/6/15	ATM located at TD Bank, 3735 Walnut St., Philadelphia, PA	I.T.	Using ATM card and PIN of I.T. to deposit a fraudulent check in the amount of \$2,300 into TD Bank checking account of I.T.
6/11/15	ATM located at TD Bank, 3735 Walnut St., Philadelphia, PA	T.N.	Using ATM card and PIN of T.N. to deposit a fraudulent check in the amount of \$2,007 into TD Bank checking account of T.N.
6/12/15	ATM located at TD Bank, 4020 City Line Ave., Philadelphia, PA	C.A.F.	Using ATM card and PIN of C.A.F. to deposit a fraudulent check in the amount of \$2,900 into TD Bank savings account of C.A.F.
6/12/15	ATM located at TD Bank, 4020 City Line Ave., Philadelphia, PA	C.A.F.	Using ATM card and PIN of C.A.F. to withdraw approximately \$100 from TD Bank savings account of C.A.F.
6/13/15	ATM located at 3706 N. Broad St., Philadelphia, PA	C.A.F.	Using ATM card and PIN of C.A.F. to withdraw approximately \$201.75 from TD Bank savings account of C.A.F.
6/13/15	ATM located at 3706 N. Broad St., Philadelphia, PA	C.A.F.	Using ATM card and PIN of C.A.F. to withdraw approximately \$201.75 from TD Bank savings account of C.A.F.
6/13/15	ATM located at 3706 N. Broad St., Philadelphia, PA	C.A.F.	Using ATM card and PIN of C.A.F. to withdraw approximately \$81.75 from TD Bank savings account of C.A.F.
6/22/15	ATM located at TD Bank, 3735 Walnut St., Philadelphia, PA	W.M.R.	Using ATM card and PIN of W.M.R. to deposit a fraudulent check in the amount of \$2,500 into TD Bank checking account of W.M.R.
6/22/15	ATM located at TD Bank, 3735 Walnut St., Philadelphia, PA	W.M.R.	Using ATM card and PIN of W.M.R. to withdraw approximately \$100 from TD Bank checking account of W.M.R.
6/23/15	ATM located at TD Bank, 3735 Walnut St., Philadelphia, PA	W.M.R.	Using ATM card and PIN of W.M.R. to withdraw approximately \$200 from TD Bank checking account of W.M.R.
6/23/15	ATM located at TD Bank, 3735 Walnut St., Philadelphia, PA	W.M.R.	Using ATM card and PIN of W.M.R. to withdraw approximately \$200 from TD Bank checking account of W.M.R. ending in 8907.
6/23/15	ATM located at TD Bank, 3735 Walnut St., Philadelphia, PA	W.M.R.	Using ATM card and PIN of W.M.R. to withdraw approximately \$200 from TD Bank checking account of W.M.R.

<u>Date</u>	<u>Location</u>	<u>TD Bank Account Holder</u>	<u>Fraudulent Transactions</u>
6/23/15	Walmart store located at 1675 S. Columbus Blvd., Philadelphia, PA	W.M.R.	Using ATM card and PIN of W.M.R. to purchase goods and obtain cash totaling approximately \$101.98 from TD Bank checking account of W.M.R.
6/23/15	ATM located at 1850 Columbus Blvd., Philadelphia, PA	W.M.R.	Using ATM card and PIN of W.M.R. to withdraw approximately \$101.75 from TD Bank checking account of W.M.R.
6/23/15	Fresh Grocer store located on Walnut Street in Philadelphia, PA	W.M.R.	Using ATM card and PIN of W.M.R. to purchase goods and obtain cash totaling approximately \$92.97 from TD Bank checking account of W.M.R.
6/29/15	ATM located at TD Bank, 2653 S. 5 <sup>th</sup> St., Philadelphia, PA	S.D.S.	Using ATM card and PIN of S.D.S. to deposit a fraudulent check in the amount of \$2,100 into TD Bank checking account of S.D.S.

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

**COUNTS ELEVEN THROUGH SIXTEEN**

**THE GRAND JURY FURTHER CHARGES THAT:**

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

**AARON DASHAWN CAPLE**

knowingly and without lawful authority, possessed and used, and aided and abetted the possession and use of, a means of identification of another person, that is, the name, automated teller machine card, and personal identification number 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>TD Bank Account Holder</u></b>
ELEVEN	3/12/15	S.N.W.
TWELVE	3/17/15	T.T.S.
THIRTEEN	3/24/15	A.M.F.
FOURTEEN	4/15/16	K.R.K.
FIFTEEN	4/30/15	M.G.
SIXTEEN	6/22/15	W.M.R.

In violation of Title 18, United States Code, Sections 1028A(a)(1), (c)(5), and 2.

## **COUNT SEVENTEEN**

### **THE GRAND JURY FURTHER CHARGES THAT:**

1. At all times material to this information, Citizens Bank was a financial institution whose deposits were insured by the Federal Deposit Insurance Corporation, Certificate Number 57282.

2. From in or about March 2015, through in or about September 2015, in the Eastern District of Pennsylvania and elsewhere, defendant

### **AARON DASHAWN CAPLE**

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

### **THE SCHEME**

3. Paragraphs 3 through 12 of Count One of the Indictment are incorporated by reference herein as though fully set forth.

4. In furtherance of the scheme, on or about the following dates, in the Eastern District of Pennsylvania and elsewhere, defendant AARON DASHWAN CAPLE used and caused to be used account numbers, ATM cards, and PINs of Citizens Bank account holders to make fraudulent check deposits into and fraudulent withdrawals from the Citizens Bank account holders' accounts, including the following:

<u>Date</u>	<u>Location</u>	<u>Citizens Bank Account Holder</u>	<u>Fraudulent Transactions</u>
3/12/15	ATM located at Citizens Bank, 2014 Cottman Ave., Philadelphia, PA	T.T	Using ATM card and PIN of T.T. to deposit two fraudulent checks in the amounts of \$800 and \$2,400, respectively, into Citizens Bank account of T.T.
3/20/15	ATM located at Citizens Bank, 134 S. 34 <sup>th</sup> St., Philadelphia, PA	T.T.	Using ATM card and PIN of T.T. to attempt to withdraw funds from Citizens Bank account of T.T.
7/6/15	ATM located at Citizens Bank, 134 S. 34 <sup>th</sup> St., Philadelphia, PA	Z.L.	Using ATM card and PIN of Z.L. to deposit a fraudulent check in the amount of \$3,200 into Citizens Bank account of Z.L.
7/7/15	ATM located at Citizens Bank, 134 S. 34 <sup>th</sup> St., Philadelphia, PA	Z.L.	Using ATM card and PIN of Z.L. to attempt to withdraw funds from Citizens Bank account of Z.L.
7/13/15	ATM located at Citizens Bank, 3500 Aramingo Ave., Philadelphia, PA	P.G.	Using ATM card and PIN of P.G. to deposit a fraudulent check in the amount of \$3,700 into Citizens Bank account of P.G.
7/13/15	ATM located at Citizens Bank, 214 S. 20 <sup>th</sup> St., Philadelphia, PA	S.S.	Using ATM card and PIN of S.S. to deposit a fraudulent check in the amount of \$3,100 into Citizens Bank account of S.S.
7/14/15	Teller window at Citizens Bank, 225 W. Lancaster Ave., Ardmore, PA	P.G.	Causing P.G. to withdraw approximately \$3,500 from P.G.'s Citizen's Bank account.
7/14/15	Teller window at Citizens Bank, 121 E. City Ave., Bala Cynwyd, PA	P.G.	Causing P.G. to withdraw approximately \$200 from P.G.'s Citizen's Bank Account.
7/14/15	Teller window at Citizen's Bank, Haddington Mall Branch, 5607 Vine St., Philadelphia, PA	S.S.	Causing S.S. to withdraw approximately \$3,000 from S.S.'s Citizen's Bank Account while defendant CAPLE waited outside.



<u>Date</u>	<u>Location</u>	<u>Citizens Bank Account Holder</u>	<u>Fraudulent Transactions</u>
7/14/15	ATM located at Citizens Bank, Haddington Mall Branch, 5607 Vine St., Philadelphia, PA	A.Y.	Using ATM card and PIN of A.Y. to deposit a fraudulent check in the amount of \$3,700 into Citizens Bank account of A.Y.
7/15/15	ATM located at Citizens Bank, 134 S. 34 <sup>th</sup> St., Philadelphia, PA	A.Y.	Using ATM card and PIN of A.Y. to withdraw approximately \$200 from Citizens Bank account of A.Y.
7/21/15	ATM located at Citizens Bank, 1501 N. Broad St., Philadelphia, PA	B.R.	Using ATM card and PIN of B.R. to deposit a fraudulent check in the amount of \$2,400 into Citizens Bank account of B.R.
7/22/15	ATM located at Citizens Bank, 134 S. 34 <sup>th</sup> St., Philadelphia, PA	B.R.	Using ATM card and PIN of B.R. to withdraw approximately \$200 from Citizens Bank account of B.R.
8/17/15	ATM located at Citizens Bank, 134 S. 34 <sup>th</sup> St., Philadelphia, PA	Y.A.	Using ATM card and PIN of Y.A. to deposit a fraudulent check in the amount of \$1,900 into Citizens Bank account of Y.A.

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

**COUNTS EIGHTEEN THROUGH TWENTY-THREE**

**THE GRAND JURY FURTHER CHARGES THAT:**

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

**AARON DASHAWN CAPLE**

knowingly and without lawful authority, possessed and used, and aided and abetted the possession and use of, a means of identification of another person, that is, the name, automated teller machine card, and personal identification number 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>Citizens Account Holder</u></b>
EIGHTEEN	3/12/15	T.T.
NINETEEN	7/6/15	Z.L.
TWENTY	7/13/15	P.G.
TWENTY-ONE	7/13/15	S.S.
TWENTY-TWO	7/14/15	A.Y.
TWENTY-THREE	7/21/15	B.R.

In violation of Title 18, United States Code, Sections 1028A(a)(1), (c)(5), and 2.

## **COUNT TWENTY-FOUR**

### **THE GRAND JURY FURTHER CHARGES THAT:**

1. At all times material to this indictment, Bank of America was a financial institution whose deposits were insured by the Federal Deposit Insurance Corporation, Certificate Number 3510.

2. From in or about March 2015, through in or about September 2015, in the Eastern District of Pennsylvania and elsewhere, defendant

### **AARON DASHAWN CAPLE**

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

### **THE SCHEME**

3. Paragraphs 3 through 12 of Count One of the Indictment are incorporated by reference herein as though fully set forth.

4. In furtherance of the scheme, on or about the following dates, in the Eastern District of Pennsylvania and elsewhere, defendant AARON DASHWAN CAPLE used and caused to be used the account numbers, ATM cards, and PINs of Bank of America account holders to make fraudulent check deposits into and fraudulent withdrawals from the Bank of America account holders' accounts, including the following:

<u>Date</u>	<u>Location</u>	<u>Bank of America Account Holder</u>	<u>Fraudulent Transactions</u>
3/12/15	ATM located at Bank of America, 2 S. 69 <sup>th</sup> St., Upper Darby, PA	D.J.	Using ATM card and PIN of D.J. to deposit three fraudulent checks in the amounts of \$1,200, \$1,100, and \$6,200, respectively, into Bank of America account of D.J.
3/19/15	ATM located at Bank of America, 1600 N. Broad St., Philadelphia, PA	R.T.A.J.	Using ATM card and PIN of R.T.A.J. to deposit a fraudulent check in the amount of \$1,200 into Bank of America account of R.T.A.J.
4/3/15	ATM located at Bank of America, 1600 N. Broad St., Philadelphia, PA	D.C.	Using ATM card and PIN of an D.C. to deposit a fraudulent check in the amount of \$2,500 into the unidentified Bank of America account holder's account.
6/4/15	ATM located at Bank of America, 1600 N. Broad St., Philadelphia, PA	P.M.	Using ATM card and PIN of P.M. to deposit a fraudulent check in the amount of \$2,000 into Bank of America account of P.M.
6/4/14	ATM located at Bank of America, 1600 N. Broad St., Philadelphia, PA	P.M.	Using ATM card and PIN of P.M. to withdraw approximately \$80 from Bank of America account of P.M.
6/4/14	ATM located at Bank of America, 1600 N. Broad St., Philadelphia, PA	P.M.	Using ATM card and PIN of P.M. to withdraw approximately \$100 from Bank of America account of P.M.

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

**COUNTS TWENTY-FIVE THROUGH TWENTY-SIX**

**THE GRAND JURY FURTHER CHARGES THAT:**

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

**AARON DASHAWN CAPLE**

knowingly and without lawful authority, possessed and used, and aided and abetted the possession and use of, a means of identification of another person, that is, the name, automated teller machine card, and personal identification number 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>Bank of America Account Holder</u></b>
TWENTY-FIVE	3/19/15	R.T.A.J.
TWENTY-SIX	6/4/15	P.M.

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 indictment, defendant

#### **AARON DASHAWN CAPLE**

shall forfeit to the United States of America any property constituting, or derived from, proceeds obtained directly or indirectly from the commission of such offense, including but not limited to \$46,429.71 in United States currency (money judgment).

2. If any of the property described above, as a result of any actor omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred to, sold to, or deposited with a third party;
- c. has been placed beyond the jurisdiction of this 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 intention 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, Sections 982(a)(2)(A).

**A TRUE BILL:**

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**GRAND JURY FOREPERSON**

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**ZANE DAVID MEMEGER  
UNITED STATES ATTORNEY**