

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

<b>UNITED STATES OF AMERICA</b>	<b>:</b>	<b>CRIMINAL NO.</b>
<b>v.</b>	<b>:</b>	<b>DATE FILED:</b>
<b>ERIC HUDSON</b>	<b>:</b>	<b>VIOLATIONS:</b>
<b>KEITH LARKE</b>	<b>:</b>	<b>18 U.S.C. § 371 (conspiracy to commit</b>
<b>WARREN SMITH</b>	<b>:</b>	<b>bank fraud and identity theft – 1 count)</b>
<b>FRED RUSH</b>	<b>:</b>	<b>18 U.S.C. § 1344 (bank fraud – 1 count)</b>
<b>ANWAR HAMEEN</b>	<b>:</b>	<b>18 U.S.C. § 1028A(a)(1) (aggravated</b>
	<b>:</b>	<b>identity theft – 63 counts)</b>
	<b>:</b>	<b>18 U.S.C. § 2 (aiding and abetting)</b>
		<b>Notice of forfeiture</b>

**INDICTMENT**

**COUNT ONE**

**THE GRAND JURY CHARGES THAT:**

At all times relevant to this indictment:

1. The following were financial institutions, the deposits of which were insured by the Federal Deposit Insurance Corporation
  - a. TD Bank; and
  - b. Univest Bank.
2. From on or about July 20, 2007 to on or about August 2014, in the Eastern District of Pennsylvania, the District of New Jersey, and the District of Delaware, defendants

**ERIC HUDSON,  
KEITH LARKE,  
WARREN SMITH,  
FRED RUSH,  
and  
ANWAR HAMEEN**

conspired and agreed, together and 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 a scheme

to commit 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.

### **MANNER AND MEANS**

3. It was part of the conspiracy that defendants ERIC HUDSON, KEITH LARKE, WARREN SMITH, FRED RUSH, and ANWAR HAMEEN and other co-conspirators, known and unknown to the grand jury, obtained names, bank account numbers, debit cards, and personal identification numbers (“PINs”) of other individuals (“the Account Holders”), and with other co-conspirators, used that information to defraud TD Bank by depositing bad checks into the accounts of the Account Holders and then quickly withdrawing funds through ATM withdrawals and debit card purchases, totaling approximately \$607,813.10.

4. Defendants ERIC HUDSON, KEITH LARKE, WARREN SMITH, FRED RUSH, and ANWAR HAMEEN and others known and unknown to the grand jury recruited and paid some of the Account Holders to open accounts with TD Bank and then to turn over their names, account numbers, debit cards, and PINs so that those newly-opened accounts could then be used for the deposit of bad checks and fraudulent withdrawals of funds.

5. Defendants ERIC HUDSON, KEITH LARKE, WARREN SMITH, FRED RUSH, and ANWAR HAMEEN and their co-conspirators recruited – and in some instances, paid – at least 36 Account Holders to provide their names, account numbers, debit cards, and PINs for their existing bank accounts so that those accounts could then be used for the deposit of bad checks and fraudulent withdrawals of funds.

6. After defendants ERIC HUDSON, KEITH LARKE, WARREN SMITH, FRED RUSH, and ANWAR HAMEEN and their co-conspirators acquired names, account



numbers, debit cards, PINs from the Account Holders, these and other co-conspirators deposited one or more fraudulent checks into those Account Holders' bank accounts ("the Defrauded Accounts").

7. After a fraudulent check or checks had been deposited into a Defrauded Account, defendants ERIC HUDSON, KEITH LARKE, WARREN SMITH, FRED RUSH, and ANWAR HAMEEN and their co-conspirators withdrew money from the Defrauded Account, using the debit card and PIN for that account, via ATM withdrawal or debit card point of sale purchases.

8. Defendants ERIC HUDSON, KEITH LARKE, WARREN SMITH, FRED RUSH, and ANWAR HAMEEN and their co-conspirators fraudulently obtained, attempted to obtain, and aided and abetted the subsequent withdrawals and debit card purchases from the Defrauded Accounts.

9. All of the attempts to defraud TD Bank and Univest Bank did not succeed so that of the approximately \$1,195,331.83 in bogus checks deposited, the conspirators successfully stole approximately \$607,813.10.

### **OVERT ACTS**

In furtherance of the conspiracy and to effect the object of the conspiracy, defendants ERIC HUDSON, KEITH LARKE, WARREN SMITH, FRED RUSH, and ANWAR HAMEEN and their co-conspirators committed the following overt acts, among others, in the Eastern District of Pennsylvania and elsewhere:

1. From on or about February 11, 2007 to on or about January 31, 2014, ERIC HUDSON, KEITH LARKE, WARREN SMITH, FRED RUSH, and ANWAR HAMEEN and their co-conspirators, having obtained TD Bank account numbers, debit cards, and PINs of

approximately 36 individuals , all known to the grand jury, deposited and attempted to deposit fraudulent checks into the bank accounts of those Account Holders and made and attempted to make fraudulent ATM withdrawals and debit card purchases against those accounts.

2. On or about September 26, 2013 K.W. attempted to open a bank account at Univest Bank in Whitpain Township in the Eastern District of Pennsylvania. Defendants ERIC HUDSON and FRED RUSH had brought K.W. to the bank to open an account and were then waiting in a car outside the bank. At that time, defendants HUDSON and RUSH possessed stolen blank checks which had been used to steal money from TD Bank. When police attempted to contact defendants Hudson and Rush at the bank, these co-conspirators attempted to flee.

3. From on or about July 17, 2007 through September 26, 2014, defendants ERIC HUDSON, KEITH LARKE, WARREN SMITH, FRED RUSH, and ANWAR HAMEEN, and their co-conspirators obtained and used, for fraudulent deposits into the Defrauded Accounts, bad checks, including stolen and closed account checks, drawn on accounts of the following account holders, whose names are all known to the grand jury:

<b>Account Holder</b>	<b>Financial Institution</b>
N.C.	Bank of America
A.P.	Bank of America
F.K.	Wells Fargo Bank
L.F.	Wells Fargo Bank
E.D.	Wells Fargo Bank
W.D.	Citizens Bank
J.S.	Citizens Bank
R.L.C.	Citizens Bank



R.B.	Citizens Bank
S.S.	Citizens Bank
J.H.	PNC Bank
E.D.	PNC Bank
J.A.	PNC Bank
D.M.	PNC Bank
M.R. & R.R.	PNC Bank
M.B.	PNC Bank
A.C.	PNC Bank
J.Y.	KNBT Bank
K.P.	PFCU Philadelphia Federal Credit Union
I.P.	Green point Bank
J.S.	Wachovia Bank
B.W.	Wachovia Bank
N.S.	Police and Fire Federal Credit Union
J.S. & H.S.	Police and Fire Federal Credit Union
B.S.I.W.	East River Bank
D.S. & A.J.	USAA Federal Savings Bank
S.B.	Sovereign Bank
S.T.M.	SB1 Federal Credit Union

4. From on or about July 17, 2007 to on or about September 26, 2014, defendants ERIC HUDSON, KEITH LARKE, WARREN SMITH, FRED RUSH, and ANWAR

HAMEEN and others, using the debit cards and PINs of the Account Holders, made the following deposits of bad checks and fraudulent withdrawals and purchases against those TD Bank Accounts:

A. FRAUDULENT USE OF TD BANK ACCOUNT OF S.N. BY ERIC HUDSON

On December 2, 2007, S.N. opened a bank account at TD Bank in Willow Grove, PA. On September 4, 2009, ERIC HUDSON deposited a \$2,925 Bank of America check belonging to N.C. The check was made payable to S.N. into the account. On September 8, 2009, over \$2,600 was withdrawn from the account through a series of ATM withdrawals and point of sale transactions. On September 11, 2009, the Bank of America check was returned to TD Bank unpaid.

B. FRAUDULENT USE OF TD BANK ACCOUNT OF L.W. BY ERIC HUDSON

On July 20, 2007, L.W. opened a checking account at Commerce Bank, now TD Bank, in Philadelphia, PA. On July 4, 2012, ERIC HUDSON deposited a \$2,100 Bank of America check belonging to A.P. into the account at an ATM machine located at a TD Bank branch at 121 South Broad St., Philadelphia, PA. The check was made payable to L.W. On July 6, 2012, ERIC HUDSON deposited a \$2,300 Citizen's Bank Check belonging to J.S. into the account. Between July 5, 2012 and July 9, 2012, over \$2,200 was withdrawn from the account in ATM withdrawals and point of sale transactions. On July 9, 2012, the \$2,100 Bank of America check drawn on A.P.'s account was returned to TD Bank unpaid. On July 12, 2012, the \$2,300 Citizen's Bank check drawn on J.S.'s account was returned to TD Bank unpaid.



C. FRAUDULENT USE OF TD BANK ACCOUNT OF C.E. BY ERIC HUDSON

On February 23, 2012, C.E. opened a checking account at a TD Bank branch in Camden, NJ. On February 19, 2013, ERIC HUDSON deposited a \$1,760 check drawn on the Wells Fargo checking account of F.K. The check was made payable to C.E. On February 20, 2013, ERIC HUDSON deposited a \$750 check drawn on the PNC Bank account of A.C. and L.C. The check was made payable to C.E. Between February 20, 2013 and February 21, 2013, over \$1,360 was withdrawn from the account through ATM withdrawals or point of sale transactions. On February 22, 2013, both checks were returned to TD Bank unpaid by their issuing bank because the accounts they were written on were closed.

D. FRAUDULENT USE OF TD BANK ACCOUNT OF T.L. BY ERIC HUDSON

On May 24, 2013, T.L. opened a checking account at a TD Bank branch in Camden, NJ. On May 24, 2013, ERIC HUDSON deposited a \$1,720 check drawn on a Citizens Bank account belonging to W.D. into T.L.'s account. On May 28, 2013, over \$500 was withdrawn from the account through ATM withdrawals or point of sale transactions. On May 30, 2013, the deposited check belonging to W.D. was returned to TD Bank by Citizens Bank unpaid.

E. FRAUDULENT USE OF TD BANK ACCOUNT OF E.S. BY ERIC HUDSON

On May 24, 2013, E.S. opened a checking account at TD Bank in Camden, NJ. On May 29, 2013, ERIC HUDSON deposited a \$1,925 check drawn on a PNC Bank account belonging to E.D. into E.S.'s newly opened checking account. Between May 29, 2013 and May 30, 2013, over \$120 was withdrawn from the account in ATM or point of sale transactions. On May 31, 2013, the deposited check belonging to E.D. was returned unpaid.



F. FRAUDULENT USE OF TD BANK ACCOUNT OF T. C. BY ERIC HUDSON

On June 4, 2013, T.C. opened a checking account at a TD Bank branch in Philadelphia, PA. On June 5, 2013, ERIC HUDSON deposited a \$1,825 check drawn on PNC Bank account belonging to E.D into T.C.'s account. On June 6, 2013, over \$1,700 was withdrawn from the account through the purchase of twelve United States Postal Service money orders. On June 6, 2013, ERIC HUDSON cashed two United States Postal Service money orders purchased using the debit card of T.C. at a Post Office in Williamstown, NJ. On June 7, 2013, ERIC HUDSON deposited a \$1,925 check drawn on a KNBT account belonging to J.Y. into T.C.'s account. Between June 6, 2013 and June 10, 2013, over \$1,800 was withdrawn from the account through ATM withdrawals and point of sale transactions. On June 11, 2013, ERIC HUDSON cashed one United States Postal Service money order at a Post Office in Williamstown, NJ. On June 15, 2013, ERIC HUDSON cashed two United States Postal Service money orders at a Post Office in Bellmawr, NJ. Between June 10, 2013 and June 13, 2013, both checks were returned unpaid by PNC Bank and KNBT Bank.

G. FRAUDULENT USE OF TD BANK ACCOUNT OF T.H. BY ERIC HUDSON

On June 7, 2013, T.H. opened a checking account at a TD Bank branch in Philadelphia, PA. On June 7, 2013, a \$1,825 check drawn on a KNBT Bank account belonging to J.Y was deposited into T.H.'s account. On June 8, 2013, over \$1,300 was withdrawn from the account through point of sale purchases of United States Postal Service money orders in Philadelphia, PA and New Jersey. On June 12, 2013, the check drawn on J.Y.'s account at KNTB Bank was returned unpaid. Between June 6, 2013 and June 13, 201, ERIC HUDSON cashed eight of the money orders purchased using the debit card belonging to T.H.



H. FRAUDULENT USE OF TD BANK ACCOUNT OF K.G. BY ERIC HUDSON

On June 14, 2013, K.G. opened a bank account at a TD Bank branch in Philadelphia, PA. On June 14, 2013, ERIC HUDSON deposited a \$1,975 Philadelphia Federal Credit Union (PFCU) check belonging to K.P. into K.G.'s account. On June 17, 2013, over \$1,870 was withdrawn from the account through ATM withdrawals and point of sale transactions, including the purchase of eleven United States Postal Service money orders worth approximately \$1,631. On June 20, 2013, PFCU returned the deposited check drawn on K.P.'s account as unpaid. Between June 19, 2013 and June 21, 2013, ERIC HUDSON cashed eight of the eleven United States Postal money orders purchased on June 17, 2013 at Post Offices in southern NJ.

I. FRAUDULENT USE OF TD BANK ACCOUNT S.S. BY FRED RUSH

On June 17, 2013, S.S. opened a checking account at TD Bank in Philadelphia, PA. On June 17, 2013, FRED RUSH deposited a \$2,100 Bank of America check belonging to A.P. On June 18, 2013, over \$1,170 was withdrawn from the account through ATM withdrawals and point of sale transactions, including the purchase of eight United States Postal Service money orders, worth more than \$1,100, purchased in Montgomery County, PA. On June 20, 2013, Bank of America returned the deposited check drawn on A.P.'s account unpaid.

J. FRAUDULENT USE OF TD BANK ACCOUNT OF T.B. BY FRED RUSH

On February 11, 2007, T.B. opened a checking account at TD Bank in Philadelphia, PA. On June 24, 2013, FRED RUSH deposited a \$2,100 PFCU check drawn on an account belonging to K.P. into the account at a TD Bank ATM machine in Philadelphia, PA. On June 25, 2013, FRED RUSH deposited a \$2,650 PFCU check drawn on an account belonging to K.P. at a TD Bank ATM machine in Philadelphia, PA. Between June 24, 2013 and June 26,



2013 over \$4,900 was withdrawn from the account through ATM withdrawals and point of sale transactions, including the purchase of six United States Postal Service money orders in Camden County, NJ and in Montgomery County, PA. On June 25, 2013, four of the fraudulently purchased money orders were cashed in Philadelphia, PA by J.R. On June 28, 2013 and July 1, 2013, PFCU returned both checks drawn on K.P.'s account as unpaid.

K. FRAUDULENT USE OF TB BANK ACCOUNT OF R.B. BY FRED RUSH

On June 24, 2013, R.B. opened a TD Bank checking account in Philadelphia, PA. On June 24, 2013, FRED RUSH deposited a \$1,900 PFCU check drawn on an account belonging to K.P. into the account. On June 27, 2013, the check was returned by PFCU unpaid.

L. FRAUDULENT USE OF TD BANK ACCOUNT OF S.R. BY FRED RUSH

On September 12, 2013, S.R. opened a checking account at a TD Bank branch in Philadelphia, PA. On September 13, 2013, FRED RUSH deposited a \$900 check drawn on a PNC Bank account belonging to J.H. Also on September 13, 2013, FRED RUSH deposited a \$750 check drawn on a Citizens Bank account of J.S in Philadelphia, PA. On September 18, 2013, both checks were returned by their respective banks unpaid.

M. FRAUDULENT USE OF TD BANK ACCOUNT OF J.P. BY ERIC HUDSON AND FRED RUSH

On July 11, 2013, J.P. opened an account at a TD Bank in Camden, NJ. On July 11, 2013, ERIC HUDSON deposited a \$1,996 PNC Bank check drawn on a checking account belonging to D.M. On July 12, 2013, over \$1,900 was withdrawn from the account through ATM withdrawals and point of sale transactions, including the purchase of eleven United States Postal Service money orders, worth more than \$1600, in NJ. On July 13, 2013, FRED RUSH cashed three of the United States Postal money orders in Philadelphia, PA. Between July 16, 2013 and



July 25, 2013, ERIC HUDSON cashed eight of those money orders. On July 16, PNC Bank returned the deposited check unpaid.

N. FRAUDULENT USE OF TD BANK ACCOUNT OF S.D. BY ERIC HUDSON AND FRED RUSH

On July 10, 2013, S.D. opened a bank account at TD Bank in Philadelphia, PA. On July 12, 2013, FRED RUSH deposited a \$2,350 PNC Bank drawn on a checking account belonging to D.M into S.D.'s account. On July 15, 2013, ERIC HUDSON deposited a \$2,100 PNC Bank check drawn on a checking account belonging to D.M. into S.D.'s account. Between July 15, 2013 and July 17, 2013, upwards of \$4,000 was withdrawn from the account through ATM withdrawals and point of sale transactions, including the purchase of 24 United States Postal Service money orders in Montgomery County, PA and in New Jersey. On July 16, 2013, FRED RUSH cashed four of the USPS money orders at Post Offices in Philadelphia, PA, Wilmington, DE, and Glassboro, NJ. On July 18, 2013, ERIC HUDSON cashed four of the USPS money orders at a Post Office in Wilmington, DE. On July 17, 2013 and July 18, 2013, the two checks were returned by PNC bank as unpaid.

O. FRAUDULENT USE OF TD BANK ACCOUNT OF A.H. BY ERIC HUDSON AND FRED RUSH

On August 19, 2013, A.H. opened a checking account at a TD Bank in Wilmington, DE. On August 19, 2013, at a TD Bank in Glassboro, NJ, FRED RUSH and ERIC HUDSON deposited a \$1,250 Citizen's Bank check drawn on an account belonging to Rush Link Computers into the account. On August 19, 2013, at a TD Bank in Mullica Hill, NJ, FRED RUSH and ERIC HUDSON deposited a \$1,125 Citizen's Bank check into an account belonging to Rush Link Computers into A.H.'s account. Between August 19, 2013 and August 20, 2013, over \$1,120 was withdrawn from the account through ATM withdrawals and point of sale



transactions, including the purchase of eight United States Postal Service money orders purchased in New Jersey. On August 22, 2013, August 24, 2013, and September 20, 2013 ERIC HUDSON cashed a total of seven United States Postal Service money orders purchased using the debit card of A.H. Both checks were returned to TD Bank unpaid on August 22, 2013.

P. FRAUDULENT USE OF TD BANK ACCOUNT OF K.J. BY ERIC HUDSON AND FRED RUSH

On September 15, 2012, K.J. opened a checking account at a TD Bank branch in Delaware. On August 22, 2013, ERIC HUDSON deposited a \$1,070 Wachovia Bank check drawn on an account belonging to B.W. and a \$950 Greenpoint Bank check drawn on an account belonging to I.P. into K.J.'s account. On August 23, 2013, FRED RUSH deposited a \$4,600 Greenpoint Bank check drawn on an account belonging to I.P. into K.J.'s account. Between August 23, 2013 and August 26, 2013, over \$3,700 was withdrawn from the account through ATM withdrawals and point of sale transactions, including the purchase of six United States Postal Service money orders valued at over \$1,400. Between August 27, 2013 and August 30, 2013, all three checks were returned unpaid by their respective banks.

Q. FRAUDULENT USE OF TD BANK ACCOUNT OF T.B. BY ANWAR HAMEEN

On July 29, 2013, T.B. opened a checking account at a TD Bank branch in Philadelphia, PA. On July 29, 2013, ANWAR HAMEEN deposited a \$2,100 Police and Fire Federal Credit Union check drawn on an account belonging to N.S. into T.B.'s account. On July 30, 2013, over \$1,800 was withdrawn from the account in point of sale transactions, including the purchase of ten United States Postal Service money orders purchased in Montgomery County, PA. On July 31, 2013, three of those money orders were cashed by ANWAR HAMEEN at Post Office in Montgomery County, PA and Philadelphia, PA. On August 2, 2013, the deposited check was returned to TD Bank unpaid.



R. FRAUDULENT USE OF TD BANK ACCOUNT OF H.B. BY ANWAR HAMEEN

On July 30, 2013, H.B. opened a bank account at a TD Bank branch in Philadelphia, PA. On July 30, 2013, ANWAR HAMEEN deposited a \$1,900 PNC Bank check drawn on an account belonging to M.R. and R.R. into H.B.'s account. On July 31, 2013, over \$1,800 was withdrawn from the account in point of sale transactions, including the purchase of twelve United States Postal Service money orders. On August 2, 2013, the deposited check was returned to TD Bank because the account was closed.

S. FRAUDULENT USE OF TD BANK ACCOUNT OF B.W. BY ANWAR HAMEEN

On July 31, 2013, B.W. opened a bank account at TD Bank branch in the Eastern District of Pennsylvania. On July 31, 2013 ANWAR HAMEEN deposited a \$1,900 East River Bank check drawn on an account belonging to B.S.I.W. On August 1, 2013, over \$1,800 was withdrawn from the account in point of sale transactions, including the purchase of twelve United States Postal Service money orders. On August 6, 2013, the deposited check was returned by East River Bank to TD Bank as unpaid.

T. FRAUDULENT USE OF TD BANK ACCOUNT OF R.B. BY ANWAR HAMEEN

On August 16, 2013, R.B. opened a checking account at a TD Bank branch in Philadelphia, PA. On August 16, 2013, ANWAR HAMEEN deposited a \$1,800 Police and Fire Federal Credit Union check drawn on an account belonging to J.S. and H.S. into the account. Also on August 16, 2013, ANWAR HAMEEN deposited a \$1,600 PNC Bank check drawn on an account belonging to M.R. and R.R. into the account. On August 19, 2013, approximately \$1,208 was withdrawn from the account through point of sale withdrawals, including the purchase of nine United States Postal Service money orders. On August 21, 2013 and August 22, 2013, PNC returned the deposited checks to TD Bank unpaid.



U. FRAUDULENT USE OF TB BANK ACCOUNT OF A.S. BY ANWAR HAMEEN

On August 21, 2013, A.S. opened a bank account at a TD Bank branch in Philadelphia, PA. On August 21, 2013, ANWAR HAMEEN deposited a \$1,400 PNC bank check drawn on an account belonging to M.R. and R.R. into the account. On August 21, 2013, ANWAR HAMEEN deposited another \$1,200 Philadelphia Federal Credit Union check drawn on an account belonging to K.P. into the account. On August 26, 2013 the PNC Bank check drawn on M.R. and R.R.'s account was returned to TD Bank unpaid. On August 27, 2013, the PFCU drawn on K.P.'s account was also returned unpaid.

V. FRAUDULENT USE OF TD BANK ACCOUNT OF R.H. BY ANWAR HAMEEN

On October 14, 2012, R.H. opened a bank account at a TD Bank branch in Philadelphia, PA. On June 27, 2013, ANWAR HAMEEN deposited a \$2,900 Police and Fire Federal Credit Union check drawn on an account belonging to N.S. into R.H.'s account. On June 28, 2013, ANWAR HAMEEN deposited a \$3,500 East River Bank check drawn on the account of B.S.I.W. into R.H.'s account. Between June 28, 2013 and July 1, 2013, over \$4,900 was withdrawn from the account either through ATM withdrawals and point of sale transactions, including the purchase of two United States Postal Service money orders. On July 3, 2013, Police and Fire Federal Credit Union returned the deposited check to TD Bank unpaid. On July 5, 2013, East River Bank returned the deposited check to TD Bank unpaid.

W. FRAUDULENT USE OF TD BANK ACCOUNT OF M.P. BY ANWAR HAMEEN

On June 14, 2013 M.P. opened a bank account at a TD Bank branch in Philadelphia, PA. On July 16, 2013, a \$2,200 PNC Bank check drawn on the account of M.R. and R.R. was deposited into the account. On July 17, 2013, over \$1,900 was withdrawn from the account in point of sale transactions, including the purchase of twelve United States Postal



Service money orders. On July 18, 2013, ANWAR HAMEEN cashed one of those money orders at a Post Office in Philadelphia, PA. On July 19, 2013, ANWAR HAMEEN cashed two of those money orders in Montgomery County, PA. On July 20, 2013, ANWAR HAMEEN cashed one of the money orders in Montgomery County. On July 22, 2013, ANWAR HAMEEN cashed two more of the money orders. On July 19, 2013, the deposited PNC Bank check was returned by PNC Bank to TD Bank unpaid.

X. FRAUDULENT USE OF TD BANK ACCOUNT OF T.V. BY WARREN SMITH

On July 1, 2013 T.V. opened a bank account at a TD Bank branch in Philadelphia, PA. On July 1, 2013, WARREN SMITH deposited a \$1,765 Wells Fargo Bank check drawn on the account of L.F. into the account. On July 1, 2013, WARREN SMITH withdrew \$20 from an ATM using the debit card of T.V. On July 2, 2013, WARREN SMITH deposited a \$1,620 Wells Fargo Bank check drawn on an account belonging to F.K. into T.V.'s account. On July 2, 2013, over \$1,700 was withdrawn from the account in ATM withdrawals and point of sale transactions, including the purchase of twelve United States Postal Service money orders. On July 5, 2013, both checks were returned to TD Bank unpaid.

Y. FRAUDULENT USE OF TD BANK ACCOUNT OF C.H. BY WARREN SMITH

On July 22, 2013, C.H. opened a bank account at a TD Bank branch in Philadelphia, PA. On July 22, 2013, WARREN SMITH deposited a \$1,675 check drawn on a USAA Federal Savings Bank account belonging to D.S. and A.J. into C.H.'s account. Between July 22, 2013 and July 25, 2013, over \$140 was withdrawn from the account through an ATM withdrawal and a point of sale transaction in Philadelphia, PA. On July 26, 2013, USAA Federal Savings Bank returned the check to TD Bank unpaid.

Z. FRAUDULENT USE OF TD BANK ACCOUNT OF S.S. BY WARREN SMITH

On July 25, 2013 S.S. opened a bank account at a TD Bank branch in Philadelphia, PA. On July 25, 2013, WARREN SMITH deposited a \$1,540 USAA Federal Savings Bank check drawn on an account belonging to D.S. and A.J. into S.S.'s account. From July 26, 2013 to July 29, 2013, over \$880 was withdrawn from the account through ATM withdrawals and point of sale transactions. On July 31, 2013, the check was returned by USAA Federal Credit Union to TD Bank unpaid.

AA. FRAUDULENT USE OF TD BANK ACCOUNT OF R.C. BY WARREN SMITH

On July 29, 2013, R.C. opened a bank account at TD Bank branch in Philadelphia, PA. On July 29, 2013, WARREN SMITH deposited a \$1,620 PNC Bank check drawn on an account belonging to M.B. into R.C.'s account. Between July 29, 2013 and August 1, 2013, more than \$1,200 was withdrawn from the account through ATM withdrawals and point of sale transactions. On August 1, 2013, PNC Bank returned the check to TD Bank unpaid with the stamp saying the account was closed.

BB. FRAUDULENT USE OF TD BANK ACCOUNT OF M.S. BY WARREN SMITH

On December 13, 2005, M.S. opened a bank account at a Commerce Bank branch, later bought by TD Bank, in Delaware County, PA. On August 12, 2010, WARREN SMITH deposited a \$2,975 Sovereign Bank check drawn on an account belonging to S.B. into the account. On August 13, 2010, over \$2,900 was withdrawn from the account through ATM withdrawals and point of sale transactions, including the purchase of three United States Postal Service money orders. On August 18, 2010 Sovereign Bank returned the check to TD bank unpaid.



CC. FRAUDULENT USE OF TD BANK ACCOUNT OF K.B. BY WARREN SMITH

On August 22, 2013, K.B. Opened a bank account at a TD Bank branch in Philadelphia, PA. On September 4, 2013, WARREN SMITH deposited an \$865 Wachovia Bank check drawn on an account belonging to J.S. into the account. Also on September 4, 2013, WARREN SMITH deposited an \$850 Wachovia Bank check drawn on an account belonging to J.S. into the account. On September 5 through September 6, 2013, over \$840 was withdrawn from the account through ATM withdrawals and point of sale transactions. On September 9, 2013 and September 10, 2013, Wachovia Bank returned the checks to TD Bank unpaid.

DD. FRAUDULENT USE OF TD BANK ACCOUNT A.B. BY KEITH LARKE

On April 25, 2013, A.B. opened a bank account at a TD Bank branch in Philadelphia, PA. On April 25, 2013, a \$1,450 SB1 Credit Union check drawn on an account belonging to S.T.M. was deposited into the account. Also on April 25, 2013, a \$1,350 KNBT Bank check drawn on an account belonging to J.Y. was deposited into A.B.'s account. On April 26, 2013, over \$1,300 was withdrawn from the account in point of sale transactions including the purchase of seven United States Postal money orders purchased at Post Office in Philadelphia, PA. On April 26, 2013, KEITH LARKE cashed four of the Postal money orders at a Post Office in Philadelphia, PA. On May 1, 2013 and May 2, 2013 both deposited checks were returned to TD Bank unpaid.

EE. FRAUDULENT USE OF TB BANK ACCOUNT OF A.A. BY KEITH LARKE

On April 29, 2013, A.A. opened a bank account at a TD Bank branch in Philadelphia, PA. On April 29, 2013, KEITH LARKE deposited a \$1,520 Citizen's Bank check drawn on an account belonging to R.B. into the account. Also on April 29, 2013, a \$1,350 SB1 Credit Union check drawn on an account belonging to S.T.M. was deposited into the account.



On April 30, 2013, over \$900 was withdrawn from the account through point of sale transactions, including the purchase of four United States Postal Service money orders. On April 30, 2013, KEITH LARKE cashed two of those money orders at a Post Office in Philadelphia, PA. On May 2, 2013 and May 6, 2013, both checks were returned to TD Bank unpaid.

FF. FRAUDULENT USE OF TD BANK ACCOUNT OF R.M. BY KEITH LARKE

On May 31, 2013, R.M. opened a bank account at a TD Bank branch in Philadelphia, PA. On June 3, 2013, KEITH LARKE deposited a \$1,950 Police and Fire Federal Credit Union check drawn on the account of J.S and H.S. into the account. On June 4, 2013, KEITH LARKE deposited a \$1,999 Police and Fire Federal Credit Union check drawn on J.S. and H.S.'s account into the R.M.'s account. On June 5, 2013, KEITH LARKE deposited a \$1,999 Police and Fire Federal Credit Union check drawn on J.S. and H.S.'s account into R.M.'s account. Between June 4, 2013 and June 6, 2013, more than \$4,000 was withdrawn from the account through ATM withdrawals and point of sale transactions, including the purchase of twenty seven United States Postal Service money orders. On June 6, 2013 and June 10, 2013, all three deposited checks were returned to TD Bank unpaid.

GG. FRAUDULENT USE OF TD BANK ACCOUNT OF T.P. BY KEITH LARKE

On June 14, 2013, T.P. opened a bank account at a TD Bank branch in Philadelphia, PA. On June 14, 2013, KEITH LARKE deposited a \$1,950 PNC Bank check drawn on A.C. account into T.P.'s account. On June 17, 2013, more than \$1,900 was withdrawn from the account in ATM withdrawals and point of sale transactions, including the purchase of thirteen United States Postal Service money orders. On June 19, 2013 the deposited check drawn on the PNC Bank account of A.C. was returned to TD Bank unpaid.



HH. FRAUDULENT USE OF TD BANK ACCOUNT OF M.Q. BY KEITH LARKE

On July 8, 2013, M.Q. opened a bank account at a TD Bank branch in Philadelphia, PA. On July 10, 2013, KEITH LARKE deposited a \$1,900 Citizen's Bank check drawn on a checking account belonging to S.S. into M.Q.'s account. On July 11, 2013, KEITH LARKE deposited a \$1,500 Citizen's bank check drawn on an account belonging to W.D. into M.Q.'s account. On July 11, 2013, more than \$1,900 was withdrawn from the account in ATM withdrawals and point of sale transactions, including the purchase of eleven United States Postal Service money orders. On July 15, 2013, Citizen's Bank returned S.S.'s check to TD Bank unpaid. On July 16, 2013, Citizen's Bank returned W.D.'s check to TD Bank unpaid.

II. FRAUDULENT USE OF TD BANK ACCOUNT OF D.G. BY KEITH LARKE

On July 24, 2013, D.G. opened a bank account at a TD Bank branch in Philadelphia, PA. On August 2, 2013, KEITH LARKE deposited a \$2,150 Wells Fargo check drawn on an account belonging to E.D. into the account. On August 5, 2013, KEITH LARKE deposited a \$1,500 Bank of America check drawn on an account belonging to A.P. into D.G.'s account. On August 5, 2013, more than \$2,100 was withdrawn from the account through ATM withdrawals and point of sale transactions, including the purchase of eleven United States Postal Service money orders in Philadelphia, PA. On August 7, 2013, Wells Fargo returned E.D.'s check to TD Bank unpaid. On August 8, 2013, Bank of America returned A.P.'s check to TD Bank unpaid.

JJ. FRAUDULENT USE OF TD BANK ACCOUNT OF J.C. BY KEITH LARKE

On September 20, 2013, J.C. opened a TD Bank account in Philadelphia, PA. On January 22, 2014, KEITH LARKE deposited two \$900 KNBT Bank checks drawn on an account belonging to J.Y. into J.C.'s account. On January 23, 2014, more than \$1,000 was withdrawn

from the account through point of sale transactions in Philadelphia, PA and New Jersey. On January 28, 2014, and January 31, 2014, both KNBT Bank checks drawn on J.Y.s account were returned to TD Bank unpaid.

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



## **COUNT TWO**

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

1. Paragraphs 1 and 3 through 9, and Overt Acts 1 through 4 of Count One of this indictment are incorporated here.

2. From on or about July 17, 2007 to on or about January 23, 2014, in the Eastern District of Pennsylvania and elsewhere, defendants

**ERIC HUDSON,  
KEITH LARKE,  
WARREN SMITH,  
FRED RUSH,  
and  
ANWAR HAMEEN**

knowingly executed and 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 that bank by means of false and fraudulent pretenses, representations, and promises.

3. Defendants ERIC HUDSON, KEITH LARKE, WARREN SMITH, FRED RUSH, and ANWAR HAMEEN and others recruited at least 36 individuals known to the grand jury ("the Account Holders") to provide their names, existing TD Bank account numbers, debit cards and personal identification numbers ("PINs") or to open TD Bank accounts and then turn over the new TD Bank account numbers, debit cards and PINs. The defendants then used the debit cards and PINs obtained from the Account Holders to enrich themselves and defraud TD Bank by depositing bad checks into the accounts of the Account Holders, totaling approximately \$1,195,331.83, and then quickly withdrawing funds, totaling approximately \$607,813.10, from those accounts through ATM withdrawals and point of sale debit card purchases.

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

**COUNTS THREE 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

**ERIC HUDSON**

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	07/04/12	A.P.
4	07/04/12	L.W.
5	02/19/13	F.K.
6	02/19/13	C.E.
7	02/20/13	A.C.
8	5/24/13	W.D.
9	5/24/13	T.L.
10	05/29/13	E.D.
11	5/29/13	E.S.
12	06/07/13	J.Y.
13	06/07/13	T.C.
14	06/07/13	T.H.
15	06/14/13	K.P.



16	06/14/13	K.G.
17	07/11/13	D.M.
18	07/11/13	J.P.
19	07/15/13	S.D.
20	08/19/13	A.H.
21	08/22/13	B.W.
22	08/22/13	L.P.
23	08/22/13	K.J.

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

**COUNTS TWENTY-FOUR THROUGH THIRTY-FOUR**

**THE GRAND JURY FURTHER CHARGES THAT:**

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

**KEITH LARKE**

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>
24	04/29/13	R.B.
25	04/29/13	A.A.
26	06/04/13	J.S. & H.S.
27	06/04/13	R.M.
28	7/10/2013	S.S.
29	07/11/13	W.D.
30	07/11/13	M.Q.
31	08/02/13	D.G.
32	08/02/13	E.D.
33	08/05/13	A.P.
34	01/22/14	J.C.

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



**COUNTS THIRTY-FIVE THROUGH FORTY-FOUR**

**THE GRAND JURY FURTHER CHARGES THAT:**

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

**WARREN SMITH**

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>
35	07/01/13	L.F.
36	07/01/13	T.V.
37	07/22/13	A.J. & D.S.
38	07/22/13	C.H.
39	07/25/13	S.S.
40	07/29/13	M.B.
41	07/29/13	R.C.
42	08/12/13	S.B.
43	09/04/13	J.S.
44	09/04/13	K.B.

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

**COUNTS FORTY-FIVE THROUGH FIFTY-FIVE**

**THE GRAND JURY FURTHER CHARGES THAT:**

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

**FRED RUSH**

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>
45	06/17/13	A.P.
46	06/17/13	S.S.
47	06/24/13	K.P.
48	06/24/13	T.B.
49	06/24/13	R.B.
50	07/12/13	D.M.
51	07/12/13	S.D.
52	08/23/13	I.P.
53	08/23/13	K.J.
54	09/13/13	J.H.
55	09/13/13	S.R.

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



**COUNTS FIFTY-SIX THROUGH SIXTY-FIVE**

**THE GRAND JURY FURTHER CHARGES THAT:**

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

**ANWAR HAMEEN**

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>
56	07/29/13	N.S.
57	07/29/13	T.B.
58	07/30/13	M.R. & R.R.
59	07/30/13	H.B.
60	07/31/13	B.S.I.W.
61	07/31/13	B.W.
62	08/16/13	J.S. & H.S.
63	08/16/13	R.B.
64	08/21/13	K.P.
65	08/21/13	A.S.

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

**NOTICE OF FORFEITURE**

**THE GRAND JURY FURTHER CHARGES THAT:**

As a result of the violations of Title 18, United States Code, Sections 371 and 1344, set forth in this indictment, defendants

**ERIC HUDSON,  
KEITH LARKE,  
WARREN SMITH,  
FRED RUSH,  
and  
ANWAR HAMEEN**

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 indictment, including, but not limited to, the sum of \$607,813.10.

If any property subject to forfeiture, 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;

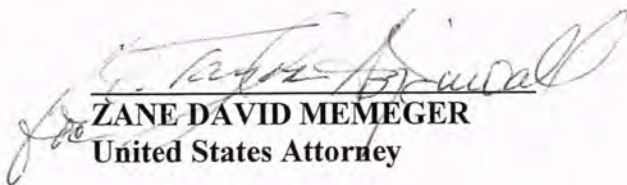


it is the intent of the United States, pursuant to Title 18, United States Code, Section 982(b), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property subject to forfeiture.

All pursuant to Title 18, United States Code, Section 982(a)(2)

**A TRUE BILL:**

\_\_\_\_\_  
**FOREPERSON**

  
**ZANE DAVID MEMEGER**  
United States Attorney