

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

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| UNITED STATES OF AMERICA | : | CRIMINAL NO. |
| v. | : | DATE FILED |
| EDWARD TERRELL PROVIDENCE | : | VIOLATIONS: |
| | : | 18 U.S.C. § 1344 (bank fraud - 1 count) |
| | : | 18 U.S.C. § 1028A(a)(1) (aggravated identity theft - 6 counts) |
| | : | 18 U.S.C. § 2 (aiding and abetting) |
| | | Notice of forfeiture |

INDICTMENT

COUNT ONE

THE GRAND JURY 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 June 2011 through in or about November 2012, in the Eastern District of Pennsylvania and elsewhere, defendant

EDWARD TERRELL PROVIDENCE

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. Defendant EDWARD TERRELL PROVIDENCE and other co-schemers unknown to the grand jury obtained personal information and TD Bank account information on TD Bank customers, including TD Bank customers who had both a checking account and a home

equity line of credit (“HELOC”) with TD Bank.

4. Defendant EDWARD TERRELL PROVIDENCE and other co-schemers known and unknown to the grand jury obtained false drivers’ licenses containing the names and addresses of TD Bank customers but with the co-schemers’ own photographs.

5. Defendant EDWARD TERRELL PROVIDENCE and other co-schemers known and unknown to the grand jury entered TD Bank branches in the Eastern District of Pennsylvania and elsewhere, posed as legitimate TD Bank customers by using the false drivers’ licenses and other means of identification and identity information of the TD Bank customers, including their names, dates of birth, address, and social security numbers, to make deposits of cash, money orders, counterfeit checks, and checks that they knew would be returned for insufficient funds into the checking accounts of the legitimate TD Bank customers whose identities they has assumed, which enabled defendant PROVIDENCE and other co-schemers to obtain the full account numbers of the TD Bank customers’ checking accounts.

6. After obtaining the TD Bank customers’ checking account numbers, defendant EDWARD TERRELL PROVIDENCE and other co-schemers known and unknown to the grand jury entered TD Bank branches in the Eastern District of Pennsylvania and elsewhere, posed as the legitimate TD Bank customers by using the false drivers’ licenses and other means of identification and identity information of the TD Bank customers, including their names, dates of birth, address, social security numbers, and checking account numbers, and obtained new ATM debit cards tied to the TD Bank customers’ checking accounts.

7. Defendant EDWARD TERRELL PROVIDENCE and other co-schemers known and unknown to the grand jury contacted the TD Bank online banking customer support center and established on-line banking services for TD Bank customers’ accounts by posing as

the TD Bank customers whose identities they had assumed, using the means of identification and identity information of the account holders, including their names, dates of birth, addresses, social security numbers, and checking account numbers, and by verifying the last deposit made into the customers' checking accounts (which defendant EDWARD TERRELL PROVIDENCE and his co-schemers had themselves made), in order to falsely verify their identities. In this manner, defendant PROVIDENCE and his co-schemers gained online access to all of the TD Bank customers' TD Bank accounts, including their HELOC accounts and savings accounts.

8. After establishing online access to the TD Bank customers' accounts, co-schemers unknown to the grand jury accessed the accounts through the internet and the TD Bank telephone customer service center to draw money from the TD Bank customers' HELOCs, and transfer that money to the TD Bank customers' checking accounts, which were tied to the ATM debit cards that defendant EDWARD TERRELL PROVIDENCE and his co-schemers had already fraudulently obtained.

9. Defendant EDWARD TERRELL PROVIDENCE and other co-schemers known and unknown to the grand jury used and aided and abetted the use of the fraudulently-obtained ATM debit cards to withdraw money from the TD Bank customers' checking accounts by withdrawing cash at ATM machines, and purchasing merchandise, money orders, and GreenDot Moneypack cards, at various retail stores, including Walmart and the United States Postal Service, all without the customers' knowledge and consent.

10. In furtherance of the scheme, defendant EDWARD TERRELL PROVIDENCE and other co-schemers known and unknown to the grand jury, performed numerous acts with respect to the following TD Bank accounts, all of which were performed without the customers' knowledge and consent, and all of which caused TD Bank to suffer an

actual loss of at least approximately \$388,255.06, with an intended loss of at least approximately \$599,445.02:

TD Bank Accounts of M.C. and J.C.

(Actual Loss of Approximately \$18,478.83 and Intended Loss of Approximately \$22,420)

11. On or about June 14, 2011, at a TD Bank branch located on Patterson Avenue in Wallington, New Jersey, defendant EDWARD TERRELL PROVIDENCE used the account number for, and deposited approximately \$80 cash into, the TD Bank joint checking account of M.C. and J.C. ending in 9084. At the time he used the account number and made this deposit, defendant PROVIDENCE presented a driver's license in J.C.'s name but containing defendant PROVIDENCE's photograph.

12. On or about June 16, 2011, an unknown co-schemer changed the home telephone number associated with the TD Bank joint checking account of M.C. and J.C. ending in 9084 by placing a telephone call to the TD Bank customer service center and posing as J.C.

13. On or about June 17, 2011, at a TD Bank branch located on Bloomfield Avenue in Montclair, New Jersey, defendant EDWARD TERRELL PROVIDENCE obtained an ATM debit card in the name of J.C. ending in 9354 tied to the TD Bank joint checking account of M.C. and J.C. ending in 9084. At the time he obtained this ATM debit card, defendant PROVIDENCE presented a driver's license in J.C.'s name but containing defendant PROVIDENCE's photograph.

14. On or about June 17, 2011, an unknown co-schemer transferred approximately \$10,500 from the TD Bank savings account of M.C. and J.C. ending in 4312 to the TD Bank joint checking account of M.C. and J.C. ending in 9084 by accessing the accounts through TD Bank's online banking website.

15. On or about June 21, 2011, an unknown co-schemer transferred approximately \$12,000 from the TD Bank HELOC account of M.C. and J.C. ending in 2468 to the TD Bank joint checking account of M.C. and J.C. ending in 9084 by accessing the accounts through TD Bank's online banking website.

16. On approximately 15 separate occasions between on or about June 17, 2011 and on or about June 23, 2011, one or more co-schemers known and unknown to the grand jury used the ATM debit card in the name of J.C. ending in 9354 to purchase approximately \$13,718.83 in merchandise, including money orders from Walmart stores and other merchants in various cities in New York and New Jersey. This amount was debited from the TD Bank joint checking account of M.C. and J.C. ending in 9084.

17. On approximately eight separate occasions between on or about June 17, 2011 and on or about June 23, 2011, one or more co-schemers unknown to the grand jury used the ATM debit card the name of J.C. ending in 9354 at multiple locations in New York and New Jersey to withdraw approximately \$4,760 from the TD Bank joint checking account of M.C. and J.C. ending in 9084.

TD Bank Accounts of J.W. and R.W.

(Actual Loss of Approximately \$36,000.79)

18. On or about July 28, 2011, at a TD Bank branch located on Sylvan Avenue in Englewood Cliffs, New Jersey, defendant EDWARD TERRELL PROVIDENCE used the account number for, and deposited approximately \$50 cash into, the TD Bank joint checking account of J.W. and R.W. ending in 0686. At the time he used the account number and made this deposit, defendant PROVIDENCE presented a driver's license in J.W.'s name but containing defendant PROVIDENCE's photograph.

19. On or about July 28, 2011, at a TD Bank branch located on Bayard Street in New Brunswick, New Jersey, defendant EDWARD TERRELL PROVIDENCE deposited approximately \$50 cash into the TD Bank joint checking account of J.W. and R.W. ending in 0686. At the time he made this deposit, defendant PROVIDENCE presented a driver's license in J.W.'s name but containing defendant PROVIDENCE's photograph.

20. On or about July 28, 2011, an unknown co-schemer established online banking services for the TD Bank joint checking account of J.W. and R.W. ending in 0686 and the TD Bank HELOC account of J.W. and R.W. ending in 4238 by placing a telephone call to the TD Bank customer service center and posing as J.W.

21. On or about July 29, 2011, at a TD Bank branch located on Stelton Road in Piscataway, New Jersey, an unknown co-schemer obtained an ATM debit card in the name of J.W. ending in 8137 tied to the TD Bank joint checking account of J.W. and R.W. ending in 0686. At the time he obtained this ATM debit card, the unknown co-schemers presented a driver's license in J.W.'s name but containing the individual's photograph.

22. On or about August 1, 2011, an unknown co-schemer transferred approximately \$15,000 from the TD Bank HELOC account of J.W. and R.W. ending in 4238 to the TD Bank joint checking account of J.W. and R.W. ending in 0686 by accessing the accounts through TD Bank's online banking website.

23. On or about August 1, 2011, an unknown co-schemer transferred approximately \$10,000 from the TD Bank joint checking account of J.W. and R.W. ending in 0686 to the TD Bank HELOC account of J.W. and R.W. ending in 4238 by accessing the accounts through TD Bank's online banking website.

24. On or about August 5, 2011, an unknown co-schemer transferred

approximately \$7,000 from the TD Bank HELOC account of J.W. and R.W. ending in 4238 to the TD Bank joint checking account of J.W. and R.W. ending in 0686 by accessing the accounts through TD Bank's online banking website.

25. On or about August 8, 2011, an unknown co-schemer transferred approximately \$1,500 from the TD Bank HELOC account of J.W. and R.W. ending in 4238 to the TD Bank joint checking account of J.W. and R.W. ending in 0686 by accessing the accounts through TD Bank's online banking website.

26. On approximately 12 separate occasions between on or about July 29, 2011 and on or about August 9, 2011, one or more co-schemers known and unknown to the grand jury used the ATM debit card in the name of J.W. ending in 8137 at multiple locations in New York and New Jersey to withdraw approximately \$8,444 from the TD Bank joint checking account of J.W. and R.W. ending in 0686.

27. On approximately 46 separate occasions between on or about July 29, 2011 and on or about August 29, 2011, one or more co-schemers unknown to the grand jury used the ATM debit card in the name of J.W. ending in 8137 to purchase approximately \$27,656.79 in merchandise, including money orders, from various merchants, including Walmart, in various cities and towns in New York and New Jersey. This amount was debited from the TD Bank joint checking account of J.W. and R.W. ending in 0686.

TD Bank Accounts of H.L. and R.L.

(Actual Loss of Approximately \$5,393.78 and Intended Loss of Approximately \$18,912.90)

28. On or about October 27, 2011, at a TD Bank branch located in Morrisville, New Jersey, defendant EDWARD TERRELL PROVIDENCE used the account number for, and deposited approximately \$87.10 cash into, the TD Bank joint checking account of H.L. and R.L.

ending in 2289. At the time he used the account number and made this deposit, defendant PROVIDENCE presented a driver's license in H.L.'s name but containing defendant PROVIDENCE's photograph.

29. On or about October 27, 2011, an unknown co-schemer established online banking services for the TD Bank joint checking account of H.L. and R.L. ending in 2289 and the TD Bank HELOC account of H.L. and R.L. ending in 6416 by placing a telephone call to the TD Bank customer service center and posing as H.L.

30. On or about October 27, 2011, an unknown co-schemer transferred approximately \$19,000 from the TD Bank HELOC account of H.L. and R.L. ending in 6416 to the TD Bank joint checking account of H.L. and R.L. ending in 2289 by accessing the accounts through TD Bank's online banking website.

31. On or about October 27, 2011, at a TD Bank branch in Ewing, New Jersey, defendant EDWARD TERRELL PROVIDENCE obtained an ATM debit card in the name of H.L. ending in 8981 tied to the TD Bank joint checking account of H.L. and R.L. ending in 2289. At the time he obtained this ATM debit card, defendant PROVIDENCE presented a driver's license in H.L.'s name but containing defendant PROVIDENCE's photograph.

32. On or about October 27, 2011, at a TD Bank branch on Shore Parkway in Brooklyn, New York, a co-schemer known to the grand jury used the ATM debit card in the name of H.L. ending in 8981 to withdraw approximately \$700 from the TD Bank joint checking account of H.L. and R.L. ending in 2289.

33. On or about October 28, 2011, at a location in Linden, New Jersey, a co-schemer unknown to the grand jury used the ATM debit card in the name of H.L. ending in 8981 to withdraw approximately \$705 from the TD Bank joint checking account of H.L. and R.L.

ending in 2289.

34. On approximately five separate occasions on or about October 28, 2011, one or more co-schemers unknown to the grand jury used the ATM debit card in the name of J.W. ending in 8137 to purchase approximately \$4,075.88 in merchandise, including money orders, from various merchants, including Walmart, in various cities and towns in New York and New Jersey. This amount was debited from the TD Bank joint checking account of H.L. and R.L. ending in 2289.

TD Bank Accounts of R.A. and D.A.

(Actual Loss of Approximately \$15,921.43 and Intended Loss of Approximately \$20,930)

35. On or about November 3, 2011, at a TD Bank branch on Red Lion Road in Philadelphia, Pennsylvania, defendant EDWARD TERRELL PROVIDENCE used the account number for, and deposited a \$70 U.S. postal money order, serial number 18812755552, made payable to R.A. into, the TD Bank joint checking account of R.A. and D.A. ending in 2458. At the time he used the account number and made this deposit, defendant PROVIDENCE presented a driver's license in R.A.'s name but containing defendant PROVIDENCE's photograph.

36. On or about November 3, 2011, at a TD Bank branch on Red Lion Road in Philadelphia, Pennsylvania, defendant EDWARD TERRELL PROVIDENCE obtained an ATM debit card in the name of R.A. ending in 6576 tied to the TD Bank joint checking account of R.A. and D.A. ending in 2458, and also obtained online banking access for the TD Bank joint checking account of R.A. and D.A. ending in 2458 and the TD Bank HELOC account of R.A. and D.A. ending in 6091. At the time he obtained this ATM debit card and the online banking access, defendant PROVIDENCE presented a driver's license in R.A.'s name but containing defendant PROVIDENCE's photograph.

37. On or about November 4, 2011, an unknown co-schemer transferred approximately \$21,000 from the TD Bank HELOC account of R.A. and D.A. ending in 6091 to the TD Bank joint checking account of R.A. and D.A. ending in 2458 by accessing the accounts through TD Bank's online banking website.

38. On approximately 15 separate occasions between on or about November 4, 2011 and on or about November 14, 2011, one or more co-schemers unknown to the grand jury used the ATM debit card in the name of R.A. ending in 6576 to purchase approximately \$11,771.68 in merchandise, including money orders, from various merchants, including Walmart, in various cities and towns in New York and New Jersey. This amount was debited from the TD Bank joint checking account of R.A. and D.A. ending in 2458.

39. On approximately six separate occasions between on or about November 4, 2011 and on or about November 9, 2011, one or more co-schemers known and unknown to the grand jury used the ATM debit card in the name of R.A. ending in 6576 at multiple locations, including TD Bank branches, in New York and New Jersey to withdraw approximately \$4,219.175 from the TD Bank joint checking account of R.A. and D.A. ending in 2458.

TD Bank Accounts of G.G. and S.G.

(Actual Loss of Approximately \$34,021.15)

40. On or about November 3, 2011, at a TD Bank branch on Frankford Avenue in Philadelphia, Pennsylvania, defendant EDWARD TERRELL PROVIDENCE used the account number for, and deposited an \$86 U.S. postal money order, serial number 18812755541, made payable to G.G. into, the TD Bank joint checking account of G.G. and S.G. ending in 7407. At the time he used the account number and made this deposit, defendant PROVIDENCE presented a driver's license in G.G.'s name but containing defendant

PROVIDENCE's photograph.

41. On or about November 3, 2011, at a TD Bank branch on Roosevelt Boulevard in Philadelphia, Pennsylvania, defendant EDWARD TERRELL PROVIDENCE obtained an ATM debit card in the name of G.G. ending in 5598 tied to the TD Bank joint checking account of G.G. and S.G. ending in 7407. At the time he obtained this ATM debit card, defendant PROVIDENCE presented a driver's license in G.G.'s name but containing defendant PROVIDENCE's photograph.

42. On or about November 4, 2011, an unknown co-schemer established online banking services for the TD Bank joint checking account of G.G. and S.G. ending in 7407 and the TD Bank HELOC account of G.G. and S.G. ending in 0744 by placing a telephone call to the TD Bank customer service center and posing as G.G.

43. On approximately five separate occasions between on or about November 4, 2011 and November 29, 2011, one or more unknown co-schemers transferred a total of approximately \$32,780 from the TD Bank HELOC account of G.G. and S.G. ending in 0744 to the TD Bank joint checking account of G.G. and S.G. ending in 7407 by placing a telephone call to the TD Bank customer service center and posing as G.G.

44. On approximately 19 separate occasions between on or about November 3, 2011 and on or about November 30, 2011, one or more co-schemers known and unknown to the grand jury used the ATM debit card in the name of G.G. ending in 5598 at multiple locations, including TD Bank branches, in New York and New Jersey to withdraw approximately \$10,891.75 from the TD Bank joint checking account of G.G. and S.G. ending in 7407.

45. On approximately 33 separate occasions between on or about November 4, 2011 and on or about November 17, 2011, one or more co-schemers unknown to the grand

jury used the ATM debit card in the name of G.G. ending in 5598 to purchase approximately \$23,215.40 in merchandise, including money orders, from various merchants, including Walmart, in various cities and towns in New York and New Jersey. This amount was debited from the TD Bank joint checking account of G.G. and S.G. ending in 7407.

TD Bank Accounts of J.C.#2 and F.C.

(Actual Loss of Approximately \$8,005.65)

46. On or about November 3, 2011, at a TD Bank branch on East State Street in Trenton, New Jersey, defendant EDWARD TERRELL PROVIDENCE used the account number for, and deposited an \$89 U.S. postal money order, serial number 18812755563, made payable to J.C.#2 into, the TD Bank joint checking account of J.C.#2 and F.C. ending in 0172. At the time he used the account number and made this deposit, defendant PROVIDENCE presented a driver's license in J.C.#2's name but containing defendant PROVIDENCE's photograph.

47. On or about November 3, 2011, at a TD Bank branch on Hulmeville Road in Bensalem, Pennsylvania, defendant EDWARD TERRELL PROVIDENCE obtained an ATM debit card in the name of J.C.#2 ending in 1481 tied to the TD Bank joint checking account of J.C.#2 and F.C. ending in 0172. At the time he obtained this ATM debit card, defendant PROVIDENCE presented a driver's license in J.C.#2's name but containing defendant PROVIDENCE's photograph.

48. On approximately three separate occasions between on or about November 3, 2011 and on or about November 7, 2011, one or more co-schemers unknown to the grand jury used the ATM debit card in the name of J.C.#2 ending in 1481 at multiple locations in New York to withdraw approximately \$2,115 from the TD Bank joint checking account of

J.C.#2 and F.C. ending in 0172.

49. On approximately four separate occasions between on or about November 4, 2011 and on or about November 7, 2011, one or more co-schemers unknown to the grand jury used the ATM debit card in the name of J.C.#2 ending in 1481 to purchase approximately \$5,979.65 in merchandise, including money orders, from various merchants, including Walmart, in various cities and towns in New York. This amount was debited from the TD Bank joint checking account of J.C.#2 and F.C. ending in 0172.

TD Bank Accounts of M.F. and C.F.

(No Actual Loss)

50. On or about November 21, 2011, an unknown co-schemer placing a telephone call to the TD Bank customer service center, posed as M.F. and inquired about the balance of the TD Bank HELOC account of M.F. and C.F. ending in 0582 and the last ATM debit card withdrawal from the TD Bank joint checking account of M.F. and C.F. ending in 4240.

51. On or about November 28, 2011, at a TD Bank branch in Southampton, Pennsylvania, a co-schemer unknown to the grand jury used the account number for, and deposited a \$70 U.S. postal money order, serial number 19761603041, made payable to M.F. into, the TD Bank joint checking account of M.F. and C.F. ending in 0582.

52. On or about November 28, 2011, at a TD Bank branch on Old York Road in Abington, Pennsylvania, defendant EDWARD TERRELL PROVIDENCE attempted to obtain an ATM debit card in the name of M.F. tied to the TD Bank joint checking account of M.F. and C.F. ending in 4240. At the time he attempted to obtain this ATM debit card, defendant PROVIDENCE used the TD Bank joint checking account number of M.F. and C.F. ending in

4240 and presented a driver's license in M.F.'s name but containing defendant PROVIDENCE's photograph.

TD Bank Accounts of P.J. and J.J.

(Actual Loss of Approximately \$615 and Intended Loss of Approximately \$34,915)

53. On or about November 25, 2011, at a TD Bank branch on Mineola Avenue in Roslyn Heights, New York, defendant EDWARD TERRELL PROVIDENCE used the account number for, and deposited approximately \$85 cash into, the TD Bank joint checking account of P.J. and J.J. ending in 7296. At the time he used the account number and made this deposit, defendant PROVIDENCE presented a driver's license in P.J.'s name but containing defendant PROVIDENCE's photograph.

54. On or about November 27, 2011, an unknown co-schemer established online banking services for the TD Bank joint checking account of P.J. and J.J. ending in 7296, the TD Bank savings account of P.J. and J.J. ending in 7283, and the TD Bank HELOC account of P.J. and J.J. ending in 4050, by placing a telephone call to the TD Bank customer service center and posing as P.J.

55. On or about November 28, 2011, at a TD Bank branch in Warrington, Pennsylvania, defendant EDWARD TERRELL PROVIDENCE obtained an ATM debit card in the name of P.J. ending in 4600 tied to the TD Bank joint checking account of P.J. and J.J. ending in 7296 and inquired as to the checking account balance. At the time he obtained this ATM debit card and made this balance inquiry, defendant PROVIDENCE presented a driver's license in P.J.'s name but containing defendant PROVIDENCE's photograph.

56. On or about November 28, 2011, an unknown co-schemer transferred approximately \$35,000 from the TD Bank savings account of P.J. and J.J. ending in 7283 to the

TD Bank joint checking account of P.J. and J.J. ending in 7296 by accessing the accounts through TD Bank's online banking website.

57. On or about November 28, 2011, at the TD Bank branch in the Sheepshead Bay section of Brooklyn, New York, an unknown co-schemer used the ATM debit card in the name of P.J. ending in 4600 to withdraw approximately \$700 from the TD Bank joint checking account of P.J. and J.J. ending in 7296.

TD Bank Accounts of K.R. and I.R.

(Actual Loss of Approximately \$73,190.42 and Intended Loss of Approximately \$148,750)

58. On or about December 16, 2011, at a TD Bank branch located on Stratford Avenue in Stratford, Connecticut, defendant EDWARD TERRELL PROVIDENCE used the account number for, and deposited approximately \$50 cash into, the TD Bank joint checking account of K.R. and I.R. ending in 6223. At the time he used the account number and made this deposit, defendant PROVIDENCE presented a driver's license in K.R.'s name but containing defendant PROVIDENCE's photograph.

59. On or about December 16, 2011, at a TD Bank branch located on Lafayette Boulevard in Bridgeport, Connecticut, a co-schemer unknown to the grand jury obtained an ATM debit card in the name of K.R. ending in 8954 tied to the TD Bank joint checking account of K.R. and I.R. ending in 6223. At the time he obtained this ATM debit card, the co-schemer presented a driver's license in K.R.'s name but containing the co-schemer's photograph.

60. On or about December 17, 2011, an unknown co-schemer placed a telephone call to the TD Bank loan servicing center posing as K.R. and requested to merge the TD Bank HELOC account of K.R. and I.R. ending in 1255 with the TD Bank joint checking

account of K.R. and I.R. ending in 6223.

61. On or about December 18, 2011, an unknown co-schemer established online banking services for the TD Bank joint checking account of K.R. and I.R. ending in 6223, the TD Bank HELOC account of K.R. and I.R. ending in 1255, and the TD Bank savings account of K.R. ending in 9824 by placing a telephone call to the TD Bank customer service center and posing as K.R..

62. On approximately 12 separate occasions between on or about December 20, 2011 and January 12, 2012, one or more unknown co-schemers transferred a total of approximately \$70,600 from the TD Bank HELOC account of K.R. and I.R. ending in 1255 to the TD Bank joint checking account of K.R. and I.R. ending in 6223 by accessing the accounts through TD Bank's online banking website and by placing telephone calls to TD Bank's customer service center and posing as K.R.

63. On approximately three separate occasions between on or about December 19, 2011 and January 17, 2012, one or more unknown co-schemers transferred approximately \$7,600 from the TD Bank savings account of K.R. ending in 9824 to the TD Bank joint checking account of K.R. and I.R. ending in 6223 by accessing the accounts through TD Bank's online banking website and by placing telephone calls to TD Bank's customer service center and posing as K.R.

64. On approximately 11 separate occasions between on or about December 20, 2011 and January 12, 2012, one or more unknown co-schemers transferred a total of approximately \$66,800 from the TD Bank HELOC account of K.R. and I.R. ending in 1255 to the TD Bank joint checking account of K.R. and I.R. ending in 6223 by accessing the accounts through TD Bank's online banking website and by placing telephone calls to TD Bank's

customer service center and posing as K.R.

65. On or about December 21, 2011, an unknown co-schemer transferred approximately \$3,800 from the TD Bank HELOC account of K.R. and I.R. ending in 1255 to the TD Bank savings account of K.R. ending in 9824 by placing a telephone call to TD Bank's customer service center and posing as K.R.

66. On approximately 47 separate occasions between on or about December 16, 2011 and on or about January 17, 2012, one or more co-schemers unknown to the grand jury used the ATM debit card in the name K.R. ending in 8954 to purchase approximately \$51,696.42 in merchandise, including money orders, from various merchants, including Walmart, and U.S. postal money orders from the United States Postal Service, in various cities and towns in New York, New Jersey, and Connecticut. This amount was debited from the TD Bank joint checking account of K.R. and I.R. ending in 6223.

67. On approximately 35 separate occasions between on or about December 19, 2011 and on or about January 17, 2012, one or more co-schemers known and unknown to the grand jury used the ATM debit card in the name of K.R. ending in 8954 at multiple locations, including TD Bank branches, in New York and New Jersey to withdraw approximately \$21,544 from the TD Bank joint checking account of K.R. and I.R. ending in 6223.

TD Bank Accounts of J.T. and S.T.

(Actual Loss of Approximately \$30,797.83 and Intended Loss of Approximately \$44,950)

68. On or about February 27, 2012, at a TD Bank branch located on Highway 9 in Old Bridge, New Jersey, defendant EDWARD TERRELL PROVIDENCE used the account number for, and deposited approximately \$50 cash into, the TD Bank joint checking account of J.T. and S.T. ending in 9069. At the time he used the account number and made this deposit,

defendant PROVIDENCE presented a driver's license in J.T.'s name but containing defendant PROVIDENCE's photograph.

69. On or about February 27, 2012, at a TD Bank branch located on Forsgate Drive in Jamesburg, New Jersey, a co-schemer unknown to the grand jury obtained an ATM debit card in the name of J.T. ending in 5555 tied to the TD Bank joint checking account of J.T. and S.T. ending in 9069. At the time he obtained this ATM debit card, the co-schemer presented a driver's license in J.T.'s name but containing the co-schemer's photograph.

70. On or about February 27, 2012, an unknown co-schemer transferred approximately \$25,000 from the TD Bank HELOC account of J.T. and S.T. ending in 1820 to the TD Bank joint checking account of J.T. and S.T. ending in 9069 by accessing the accounts through TD Bank's online banking website.

71. On or about March 9, 2012, an unknown co-schemer transferred approximately \$20,000 from the TD Bank HELOC account of J.T. and S.T. ending in 1820 to the TD Bank joint checking account of J.T. and S.T. ending in 9069 by accessing the accounts through TD Bank's online banking website.

72. On approximately 45 separate occasions between on or about February 27, 2012 and on or about March 12, 2012, one or more co-schemers unknown to the grand jury used the ATM debit card in the name J.T. ending in 5555 to purchase approximately \$21,627.83 in merchandise, including money orders, from various merchants, including Walmart, and U.S. postal money orders from the United States Postal Service, in various cities and towns in New York and Connecticut. This amount was debited from the TD Bank joint checking account of J.T. and S.T. ending in 9069.

73. On approximately 16 separate occasions between on or about February 27,

2012 and on or about March 12, 2012, one or more co-schemers known and unknown to the grand jury used the ATM debit card in the name of J.T. ending in 5555 at multiple locations in New York, New Jersey, and Connecticut to withdraw approximately \$9,220 from the TD Bank joint checking account of J.T. and S.T. ending in 9069.

TD Bank Accounts of V.L. and C.L.

(Actual Loss of Approximately \$7,668.29 and Intended Loss of Approximately \$12,495.40)

74. On or about February 29, 2012, at a TD Bank branch located on Westport Avenue in Norwalk, Connecticut, defendant EDWARD TERRELL PROVIDENCE used the account number for, and deposited a \$60 U.S. postal money order made payable to V.L. into, the TD Bank joint checking account of V.L. and C.L. ending in 1687. At the time he used the account number and made this deposit, defendant PROVIDENCE presented a driver's license in V.L.'s name but containing defendant PROVIDENCE's photograph.

75. On or about February 29, 2012, at a TD Bank branch located on Charles Street in Westport, Connecticut, defendant EDWARD TERRELL PROVIDENCE obtained an ATM debit card in the name of V.L. ending in 1548 tied to the TD Bank joint checking account of V.L. and C.L. ending in 1687. At the time he obtained this ATM debit card, defendant PROVIDENCE presented a driver's license in V.L.'s name but containing defendant PROVIDENCE's photograph.

76. On or about February 29, 2012, an unknown co-schemer transferred approximately \$10,000 from the TD Bank HELOC account of V.L. and C.L. ending in 3608 to the TD Bank joint checking account of V.L. and C.L. ending in 1687 by placing a telephone call to the TD Bank customer service center and posing as V.L.

77. On approximately five separate occasions between on or about March 1,

2012 and on or about March 5, 2012, one or more co-schemers unknown to the grand jury used the ATM debit card in the name V.L. ending in 1548 to purchase approximately \$5,613.29 in merchandise, including money orders, from various merchants, including Home Depot and the United States Postal Service, in New York. This amount was debited from the TD Bank joint checking account of V.L. and C.L. ending in 1687.

78. On approximately three separate occasions between on or about March 1, 2012 and on or about March 2, 2012, one or more co-schemers unknown to the grand jury used the ATM debit card in the name of V.L. ending in 1548 at multiple locations in New York, to withdraw approximately \$2,115 from the TD Bank joint checking account of V.L. and C.L. ending in 1687.

79. On or about March 5, 2012, an unknown co-schemer transferred approximately \$2,555.40 from the TD Bank HELOC account of V.L. and C.L. ending in 3608 to the TD Bank joint checking account of V.L. and C.L. ending in 1687 by placing a telephone call to the TD Bank customer service center and posing as V.L.

TD Bank Accounts of E.W. and V.W.

(Actual Loss of Approximately \$76,528.92 and Intended Loss of Approximately \$102,130)

80. On or about March 23, 2012, at a TD Bank branch located in Oaklyn, New Jersey, defendant EDWARD TERRELL PROVIDENCE used the account number for, and deposited a \$70 U.S. postal money order made payable to E.W. into, the TD Bank joint checking account of V.W. and E.W. ending in 6054. At the time he used the account number and made this deposit, defendant PROVIDENCE presented a driver's license in E.W.'s name but containing defendant PROVIDENCE's photograph.

81. On or about March 26, 2012, at a TD Bank branch located on route 73 in

Mount Laurel, New Jersey, defendant EDWARD TERRELL PROVIDENCE obtained an ATM debit card in the name of E.W. ending in 5127 tied to the TD Bank joint checking account of V.W. and E.W. ending in 6054. At the time he obtained this ATM debit card, defendant PROVIDENCE presented a driver's license in E.W.'s name but containing defendant PROVIDENCE's photograph.

82. On or about March 26, 2012, an unknown co-schemer established online banking services for the TD Bank joint checking account of V.W. and E.W. ending in 6054 and the TD Bank HELOC account of V.W. and E.W. ending in 0318 by placing a telephone call to the TD Bank customer service center and posing as E.W.

83. On or about March 27, 2012, an unknown co-schemer transferred approximately \$36,000 from the TD Bank HELOC account of V.W. and E.W. ending in 0318 to the TD Bank joint checking account of V.W. and E.W. ending in 6054 by placing a telephone call to the TD Bank customer service center and posing as E.W.

84. On or about April 9, 2012, an unknown co-schemer transferred approximately \$25,000 from the TD Bank HELOC account of V.W. and E.W. ending in 0318 to the TD Bank joint checking account of V.W. and E.W. ending in 6054 by placing a telephone call to the TD Bank customer service center and posing as E.W.

85. On or about April 17, 2012, an unknown co-schemer transferred approximately \$15,200 from the TD Bank HELOC account of V.W. and E.W. ending in 0318 to the TD Bank joint checking account of V.W. and E.W. ending in 6054 by placing a telephone call to the TD Bank customer service center and posing as E.W.

86. On or about April 23, 2012, an unknown co-schemer transferred approximately \$26,000 from the TD Bank HELOC account of V.W. and E.W. ending in 0318 to

the TD Bank joint checking account of V.W. and E.W. ending in 6054 by placing a telephone call to the TD Bank customer service center and posing as E.W.

87. On approximately 98 separate occasions between on or about March 27, 2012 and on or about April 23, 2012, one or more co-schemers unknown to the grand jury used the ATM debit card in the name of E.W. ending in 5127 to purchase approximately \$59,748.92 in merchandise, including money orders, from various merchants, including Walmart and the United States Postal Service, in various cities and towns in New York and New Jersey. This amount was debited from the TD Bank joint checking account of V.W. and E.W. ending in 6054.

88. On approximately 24 separate occasions between on or about March 27, 2012 and on or about April 20, 2012, one or more co-schemers unknown to the grand jury used the ATM debit card in the name of E.W. ending in 5127 at multiple locations, including TD Bank branches in New York and New Jersey, to withdraw approximately \$16,850 from the TD Bank joint checking account of V.W. and E.W. ending in 6054.

TD Bank Accounts of J.H.

(Actual Loss of Approximately \$18,168.01 and Intended Loss of \$30,598)

89. On or about March 26, 2012, at a TD Bank branch located on Main Street in Mullica Hill, New Jersey, defendant EDWARD TERRELL PROVIDENCE opened a TD Bank checking account ending in 3132 in the name of existing TD Bank customer J.H., made a \$2 cash deposit into the account, obtained a \$1,000 line of credit, obtained an ATM debit card in the name of J.H. ending in 0633 tied to the new TD Bank checking account of J.H. ending in 3132, and signed J.H. up for online banking. At the time he did these things, defendant PROVIDENCE presented a driver's license in J.H.'s name but containing defendant PROVIDENCE's photograph.

90. On or about March 27, 2012, an unknown co-schemer transferred approximately \$29,600 from the TD Bank HELOC account of J.H. ending in 2233 to the TD Bank checking account of J.H. ending in 3132 by accessing the accounts through TD Bank's online banking website.

91. On approximately 23 separate occasions between on or about March 27, 2012 and on or about April 3, 2012, one or more co-schemers unknown to the grand jury used the ATM debit card in the name of J.H. ending in 0633 to purchase approximately \$13,171.02 in merchandise, including money orders, from various merchants, including Walmart and the United States Postal Service, in various cities and towns in New York. This amount was debited from the TD Bank checking account of J.H. ending in 3132.

92. On approximately nine separate occasions between on or about March 27, 2012 and on or about April 3, 2012, one or more co-schemers known and unknown to the grand jury used the ATM debit card in the name of J.H. ending in 0633 at multiple locations, including TD Bank branches in New York, to withdraw approximately \$4,998.99 from the TD Bank checking account of J.H. ending in 3132.

TD Bank Accounts of M.R. and S.R.

(Actual Loss of Approximately \$256.50)

93. On or about May 7, 2012, at a TD Bank branch located on Elizabeth Street in Pemberton, New Jersey, defendant EDWARD TERRELL PROVIDENCE used the account number for, and deposited approximately \$48.50 cash into, the TD Bank joint checking account of M.R. and S.R. ending in 2096. At the time he used the account number and made this deposit, defendant PROVIDENCE presented a driver's license in M.R.'s name but containing defendant PROVIDENCE's photograph.

94. On or about May 7, 2012, at a TD Bank branch located on Elizabeth Street in Pemberton, New Jersey, defendant EDWARD TERRELL PROVIDENCE obtained an ATM debit card in the name of M.R. ending in 2993 tied to the TD Bank joint checking account of M.R. and S.R. ending in 2096. At the time he obtained this ATM debit card, defendant PROVIDENCE presented a driver's license in M.R.'s name but containing defendant PROVIDENCE's photograph.

95. On or about May 7, 2012, at a location in Brooklyn, New York, a co-schemer unknown to the grand jury used the ATM debit card in the name of M.R. ending in 2993 to withdraw approximately \$305 from the TD Bank joint checking account of M.R. and S.R. ending in 2096.

TD Bank Accounts of T.W. and L.W.

(Actual Loss of Approximately \$13,967.37 and Intended Loss of Approximately \$23,932)

96. On or about May 7, 2012, at a TD Bank branch located in Rancocas, New Jersey, defendant EDWARD TERRELL PROVIDENCE used the account number for, and deposited a \$68 U.S. postal money order, serial number 19790058508, made payable to T.W. into, the TD Bank joint checking account of T.W. and L.W. ending in 6995. At the time he used the account number and made this deposit, defendant PROVIDENCE presented a driver's license in T.W.'s name but containing defendant PROVIDENCE's photograph.

97. On or about May 8, 2012, at a TD Bank branch located on Marsh Road in Wilmington, Delaware, defendant EDWARD TERRELL PROVIDENCE obtained an ATM debit card in the name of T.W. ending in 7972 tied to the TD Bank joint checking account of T.W. and L.W. ending in 6995. At the time he obtained this ATM debit card, defendant PROVIDENCE presented a driver's license in T.W.'s name but containing defendant

PROVIDENCE's photograph.

98. On or about May 9, 2012, an unknown co-schemer transferred approximately \$24,000 from the TD Bank HELOC account of T.W. and L.W. ending in 4031 to the TD Bank joint checking account of T.W. and L.W. ending in 6995 by accessing the accounts through TD Bank's online banking website.

99. On approximately 25 separate occasions between on or about May 9, 2012 and on or about May 16, 2012, one or more co-schemers unknown to the grand jury used the ATM debit card in the name of T.W. ending in 7972 to purchase approximately \$11,225.37 in merchandise, including money orders, from various merchants, including Walmart and the United States Postal Service, in various cities and towns in New York and New Jersey. This amount was debited from the TD Bank joint checking account of T.W. and L.W. ending in 6995.

100. On approximately four separate occasions between on or about May 9, 2012 and on or about May 14, 2012, one or more co-schemers known and unknown to the grand jury used the ATM debit card in the name of T.W. ending in 7972 at multiple locations, including TD Bank branches in New York, to withdraw approximately \$2,810 from the TD Bank joint checking account of T.W. and L.W. ending in 6995.

TD Bank Accounts of V.S. and B.B.

(Actual Loss of Approximately \$3,352.66)

101. On or about May 8, 2012, at a TD Bank branch located on the West Chester Pike in Chadds Ford, Pennsylvania, defendant EDWARD TERRELL PROVIDENCE obtained an ATM debit card in the name of V.S. ending in 4319 tied to the TD Bank joint checking account of V.S. and B.B. ending in 2165. At the time he obtained this ATM debit card, defendant PROVIDENCE presented a driver's license in V.S.'s name but containing defendant

PROVIDENCE's photograph.

102. On or about May 8, 2012, at a TD Bank branch on Limestone Road in Wilmington, Delaware, an co-schemer known to the grand jury used the ATM debit card in the name of V.S. ending in 4319 to withdraw approximately \$700 from the TD Bank joint checking account of V.S. and B.B. ending in 2165.

103. On approximately four separate occasions between on or about May 8, 2012 and on or about May 10, 2012, one or more co-schemers known and unknown to the grand jury used the ATM debit card in the name of V.S. ending in 4319 to purchase approximately \$2,652.66 in merchandise from various merchants, including Walmart, in various cities in Delaware. This amount was debited from the TD Bank joint checking account of V.S. and B.B. ending in 2165.

TD Bank Trust Account of H.J.

(No Actual Loss)

104. On or about July 20, 2012, at a TD Bank branch located on the Black Horse Pike in Runnemede, New Jersey, defendant EDWARD TERRELL PROVIDENCE used the account number for, and deposited a \$50 U.S. postal money order, serial number 20151635534, made payable to A.J. into, the TD Bank trust account of H.J. ending in 7525 by posing as A.J, the trustee of H.J.'s trust account. At the time he used the account number and made this deposit, defendant PROVIDENCE presented a driver's license in A.J.'s name but containing defendant PROVIDENCE's photograph.

105. On or about July 20, 2012, at a TD Bank branch located on Lancaster Pike in Hockessin, Delaware, defendant EDWARD TERRELL PROVIDENCE attempted to obtain an ATM debit card in the name of A.J. tied to the TD Bank trust account of H.J. ending in 7525,

over which A.J. was trustee. At the time he attempted to obtain this ATM debit card, defendant PROVIDENCE presented a driver's license in A.J.'s name but containing defendant PROVIDENCE's photograph.

TD Bank Accounts of J.M., M.M. and D.M.

(Actual Loss of Approximately \$2,510.19)

106. On or about July 20, 2012, at a TD Bank branch located on Marsh Road in Wilmington, Delaware, defendant EDWARD TERRELL PROVIDENCE used the account number for, and deposited a \$50 U.S. postal money order, serial number 20151635523, made payable to D.M. into, the TD Bank joint checking account of J.M., M.M. and D.M. ending in 9976. At the time he used the account number and made this deposit, defendant PROVIDENCE presented a driver's license in D.M.'s name but containing defendant PROVIDENCE's photograph.

107. On or about July 20, 2012, at a TD Bank branch located on Marsh Road in Wilmington, Delaware, defendant EDWARD TERRELL PROVIDENCE obtained an ATM debit card in the name of D.M. ending in 5912 tied to the TD Bank joint checking account of J.M., M.M., and D.M. ending in 9976. At the time he obtained this ATM debit card, defendant PROVIDENCE presented a driver's license in D.M.'s name but containing defendant PROVIDENCE's photograph.

108. On or about July 20, 2012, at a Walmart store located in Wilmington, Delaware, a co-schemer unknown to the grand jury used the ATM debit card the name of D.M. ending in 5912 to purchase GreenDot Moneypack cards and a money order, thereby causing approximately \$1,955.19 to be debited from the TD Bank joint checking account of J.M., M.M., and D.M. ending in 9976.

109. On or about July 20, 2012, at a location in Wilmington, Delaware, an unknown co-schemer used the ATM debit card in the name of D.M. ending in 5912 to withdraw approximately \$605 from the TD Bank joint checking account of J.M., M.M., and D.M. ending in 9976.

TD Bank Accounts of T.P.F. and T.A.F.

(Actual Loss of Approximately \$43,378.24 and Intended Loss of Approximately \$55,264.78)

110. On or about July 27, 2012, at a TD Bank branch in Bethlehem, Pennsylvania, defendant EDWARD TERRELL PROVIDENCE made an account inquiry to obtain confidential account information relating to, the TD Bank joint checking account of T.P.F. and T.A.F. ending in 9188 by posing as T.P.F. At the time he made this account inquiry, defendant PROVIDENCE presented a driver's license in T.P.F.'s name but containing defendant PROVIDENCE's photograph.

111. On or about July 27, 2012, at a TD Bank branch located in Edison, New Jersey, a co-schemer unknown to the grand jury used the account number for, and deposited a \$35.22 U.S. postal money order, serial number 20123013025, made payable to T.P.F. into, the TD Bank joint checking account of T.P.F. and T.A.F. ending in 9188. At the time he used the account number and made this deposit, the unknown co-schemer presented a driver's license in T.P.F.'s name but containing the co-schemer's photograph.

112. On or about September 4, 2012, an unknown co-schemer obtained an ATM debit card in the name of T.P.F. ending in 4679 tied to the TD Bank joint checking account of T.P.F. and T.A.F. ending in 9188 by placing a telephone call to the TD Bank customer service center and posing as T.P.F.

113. On approximately ten separate occasions between on or about September

11, 2012 and on or about October 9, 2012, one or more unknown co-schemer transferred a total of approximately \$43,200 from the TD Bank HELOC account of T.P.F. and T.A.F. ending in 2993 to the TD Bank joint checking account of T.P.F. and T.A.F. ending in 9188 by accessing the accounts through TD Bank's online banking website.

114. On or about October 4, 2012, at a TD Bank branch located in South Plainfield, New Jersey, a co-schemer known to the grand jury used the account number for, and deposited a counterfeit check in the amount of \$12,100, check number 4204, payable to T.P.F., purportedly drawn on a JP Morgan Chase credit card account of J.D.L. into, the TD Bank joint checking account of T.P.F. and T.A.F. ending in 9188.

115. On approximately 54 separate occasions between on or about September 11, 2012 and on or about October 1, 2012, one or more co-schemers known and unknown to the grand jury used the ATM debit card in the name of T.P.F. ending in 4679 to purchase approximately \$30,195.01 in merchandise, including money orders and GreenDot Moneypack cards, from various merchants, including Walmart and the United States Postal Service, in various cities and towns in New York and New Jersey. This amount was debited from the TD Bank joint checking account of T.P.F. and T.A.F. ending in 9188.

116. On approximately 24 separate occasions between on or about September 11, 2012 and on or about, October 9, 2012, one or more co-schemers known and unknown to the grand jury used the ATM debit card in the name of T.P.F. ending in 4679 at multiple locations in New York and New Jersey to withdraw approximately \$13,218.45 from the TD Bank joint checking account of T.P.F. and T.A.F. ending in 9188.

Attempt To Open TD Bank Business Account Using Identity of P.D.

(No Actual Loss)

117. On or about November 13, 2012, at a TD Bank branch in Edison, New Jersey, defendant EDWARD TERRELL PROVIDENCE attempted to open a TD Bank business checking account in the name of “D Best Medical Services LLC” by representing that he was P.D. and that he was the owner of the company, and by presenting a driver’s license in P.D.’s name but containing defendant PROVIDENCE’s photograph. After being told by the branch manager that he needed additional paperwork to open the account, defendant PROVIDENCE left the branch.

118. On or about November 13, 2012, at a TD Bank branch in Metuchen, New Jersey, defendant EDWARD TERRELL PROVIDENCE attempted to open a TD Bank business checking account in the name of “D Best Medical Services LLC” by representing that he was P.D. and that he was the owner of the company, and by presenting a driver’s license in P.D.’s name but containing defendant PROVIDENCE’s photograph. After being told by the customer service representative that he would have to provide proof of address, defendant PROVIDENCE left the branch.

119. On or about November 19, 2012, defendant EDWARD TERRELL PROVIDENCE returned to the TD Bank branch in Metuchen, New Jersey, with fraudulent proof of address for “D Best Medical Services LLC” and again attempted to open a TD Bank business checking account in the name of that company by representing that he was P.D., the purported owner of the company, and by presenting a driver’s license in P.D.’s name but containing defendant PROVIDENCE’s photograph.

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

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 3, 2011, in the Eastern District of Pennsylvania, and elsewhere, defendant

EDWARD TERRELL PROVIDENCE

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, TD Bank account number, and TD Bank ATM debit card number of R.A., during and in relation to bank fraud.

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

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 3, 2011, in the Eastern District of Pennsylvania, and elsewhere, defendant

EDWARD TERRELL PROVIDENCE

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, TD Bank account number, and TD Bank ATM debit card number of G.G., during and in relation to bank fraud.

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

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 3, 2011, in the Eastern District of Pennsylvania, and elsewhere, defendant

EDWARD TERRELL PROVIDENCE

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, TD Bank account number, and TD Bank ATM debit card number of J.C.#2, during and in relation to bank fraud.

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

COUNT FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 28, 2011, in the Eastern District of Pennsylvania, and elsewhere, defendant

EDWARD TERRELL PROVIDENCE

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 and TD Bank account number of M.F., during and in relation to bank fraud.

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

COUNT SIX

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 28, 2011, in the Eastern District of Pennsylvania, and elsewhere, defendant

EDWARD TERRELL PROVIDENCE

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, TD Bank account number, and TD Bank ATM debit card number of P.J., during and in relation to bank fraud.

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

COUNT SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about May 8, 2012, in the Eastern District of Pennsylvania, and elsewhere,
defendant

EDWARD TERRELL PROVIDENCE

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, TD Bank account number, and TD Bank ATM debit card number of V.S., during and in relation to bank fraud.

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

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

1. As a result of the violations of Title 18, United States Code, Section 1344 set forth in this information, defendant

EDWARD TERRELL PROVIDENCE

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 \$388,255.06 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:

GRAND JURY FOREPERSON

**ZANE DAVID MEMEGER
UNITED STATES ATTORNEY**