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25-cr-00293
Judge John F. Kness
Magistrate Judge Young B. Kim
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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA	)	
	)	No.
v.	)	
	)	
RICHARD YOUNG JR.	)	Violations: Title 18, United States
	)	Code, Sections 1344(2) and 641

COUNT ONE

The SPECIAL APRIL 2024 GRAND JURY charges:

1. At times material to this indictment:

Individuals and Entities Involved

a. The Social Security Act established a number of benefit programs, including the Retirement Insurance Benefit program, which provided monthly benefits to qualified retired and disabled workers, their spouses and dependents, and survivors of insured workers. The Social Security Administration, an agency of the United States, administered the Retirement Insurance Benefit program.

b. At times relevant to this indictment, RICHARD YOUNG JR. was a resident of Maywood, Illinois, and elsewhere.

c. Individual A, RICHARD YOUNG JR.'s father, died on March 20, 2006.

d. At times material to this indictment, Bank A was a financial institution, the deposits of which were insured by the Federal Deposit Insurance Corporation.

The Fraudulent Scheme

2. Beginning no later than in or around March 2015, and continuing until in or around May 2021, in the Northern District of Illinois, Eastern Division, and elsewhere,

RICHARD YOUNG JR.,

defendant herein, knowingly devised, intended to devise, and participated in a scheme to obtain money and property under the custody and control of a financial institution by means of materially false and fraudulent pretenses and representations, as further described below.

3. It was part of the scheme that on or about August 15, 2013, RICHARD YOUNG JR. caused the application for Social Security Retirement Insurance Benefits on behalf of Individual A, who was deceased. Unaware that Individual A was deceased, the Social Security Administration granted the application in or around September 2013 and began issuing Individual A Social Security Retirement Insurance Benefits. Beginning no later than in or around March 2015, the Social Security Administration deposited Individual A's Retirement Insurance Benefits on Bank A Direct Express Cards, which were registered solely in Individual A's name.

4. It was part of the scheme that beginning no later than in or around March 2015, defendant RICHARD YOUNG JR. accessed approximately $178,683.25 in Individual A's Social Security Retirement Insurance Benefits by using the Bank A Direct Express cards registered in Individual A's name, including but not limited to, by making ATM withdrawals using those cards.

5. It was further part of the scheme that defendant RICHARD YOUNG JR. used Individual A's Social Security Retirement Insurance Benefits to make purchases at, among other locations, casinos, fast food restaurants, gas stations, and retailers, and to pay bills.

6. It was further part of the scheme that, between in or around March 2015 and in or around May 2021, defendant RICHARD YOUNG JR. used Bank A Direct Express cards registered solely in Individual A's name to withdraw Individual A's Social Security Retirement Insurance Benefits at ATMs located at casinos, including the Rivers Casino in Des Plaines, Illinois, and the Horseshoe Casino in Hammond, Indiana.

7. It was further part of the scheme that on or about September 26, 2020, defendant RICHARD YOUNG JR. contacted Bank A by phone and misrepresented himself as Individual A by providing Individual A's name, Social Security Number, and date of birth, to request changes to the account registered in Individual A's name.

8. It was further part of the scheme that defendant RICHARD YOUNG JR. misrepresented, concealed, and hid, and caused to be misrepresented, concealed, and hidden, the existence and purpose of the scheme and the acts done in furtherance of the scheme.

9. On or about August 27, 2020, at Des Plaines, in the Northern District of Illinois, Eastern Division, and elsewhere,

RICHARD YOUNG JR.,

defendant herein, knowingly executed and attempted to execute the above-described scheme by causing $1,006.99 to be withdrawn via ATM using a Bank A Debit Card registered in Individual A's name;

In violation of Title 18, United States Code, Section 1344(2).

COUNT TWO

The SPECIAL APRIL 2024 GRAND JURY further charges:

1. Paragraphs 1 through 7 of Count One are incorporated here.

2. On or about September 24, 2020, at Des Plaines, in the Northern District of Illinois, Eastern Division, and elsewhere,

RICHARD YOUNG JR.,

defendant herein, knowingly executed and attempted to execute the above-described scheme by causing $1,066.99 to be withdrawn via ATM using a Bank A Debit Card registered in Individual A's name;

In violation of Title 18, United States Code, Section 1344(2).

COUNT THREE

The SPECIAL APRIL 2024 GRAND JURY further charges:

1. Paragraphs 1 through 7 of Count One are incorporated here.

2. On or about October 29, 2020, at Des Plaines, in the Northern District of Illinois, Eastern Division, and elsewhere,

RICHARD YOUNG JR.,

defendant herein, knowingly executed and attempted to execute the above-described scheme by causing $506.99 to be withdrawn via ATM using a Bank A Debit Card registered in Individual A's name;

In violation of Title 18, United States Code, Section 1344(2).

COUNT FOUR

The SPECIAL APRIL 2024 GRAND JURY further charges:

1. Paragraphs 1 through 7 of Count One are incorporated here.

2. On or about February 2, 2021, at Des Plaines, in the Northern District of Illinois, Eastern Division, and elsewhere,

RICHARD YOUNG JR.,

defendant herein, knowingly executed and attempted to execute the above-described scheme by causing $506.99 to be withdrawn via ATM using a Bank A Debit Card registered in Individual A's name;

In violation of Title 18, United States Code, Section 1344(2).

COUNT FIVE

The SPECIAL APRIL 2024 GRAND JURY further charges:

Beginning no later than in or around July 2020 and continuing through in or around May 2021, at Maywood, in the Northern District of Illinois, Eastern Division, and elsewhere,

RICHARD YOUNG JR.,

defendant herein, did knowingly and willfully embezzle, steal, purloin, and convert to his own use or use of another, money of the United States, namely, approximately $20.572.25 in funds administered by the Social Security Administration, which funds defendant was not entitled to receive;

In violation of Title 18, United States Code, Section 641.

FORFEITURE ALLEGATION

The SPECIAL APRIL 2024 GRAND JURY further alleges:

1. Upon conviction of an offense in violation of Title 18, United States Code, Section 1344(2), as set forth in this indictment, defendant shall forfeit to the United States of America any property which constitutes and is derived from proceeds traceable to the offense, as provided in Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c).

2. The property to be forfeited includes, but is not limited to, a personal money judgment in the amount of approximately $178,683.25.

3. If any of the property described above, as a result of any act or omission by defendant cannot be located upon the exercise of due diligence; has been transferred or sold to, or deposited with, a third party; has been placed beyond the jurisdiction of the Court; has been substantially diminished in value; or has been commingled with other property which cannot be divided without difficulty, the United States of America shall be entitled to forfeiture of substitute property, as provided in Title 21, United States Code, Section 853(p).

A TRUE BILL:

FOREPERSON

Signed by Scott Edenfield on behalf of the
UNITED STATES ATTORNEY