

FILED

9/23/2021

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THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

MAHLIK WASHINGTON,
also known as "Milly,"
SHUNTONESE RICHARDSON,
LATIYAH DAVIDSON,
also known as "T,"
also known as "Tiyah," and
C'ORY VONPIER McNEAL

No. **1:21-CR-00602**

Violations: Title 18, United States
Code, Sections 371 and 1708

JUDGE DURKIN
MAGISTRATE JUDGE JANTZ

COUNT ONE

The SPECIAL JULY 2021 GRAND JURY charges:

1. At times material to this indictment:

a. Defendants SHUNTONESE RICHARDSON, LATIYAH DAVIDSON and C'ORY VONPIER McNEAL were employed by the United States Postal Service ("USPS").

b. As a part of their USPS employment, defendants SHUNTONESE RICHARDSON, LATIYAH DAVIDSON, and C'ORY VONPIER McNEAL were responsible for processing mail for zip codes beginning with 600, 610, and 611 out of the USPS Processing and Distribution Center ("P&DC") located in Palatine, Illinois.

2. From in or around December 2018, and continuing through in or around November 2019, in the Northern District of Illinois, Eastern Division, and elsewhere,

Mahlik WASHINGTON,
also known as "Milly,"
Shuntonese RICHARDSON,
Latiyah DAVIDSON,
also known as "T,"
also known as "Tiyah," and
C'ORY VONPIER McNEAL,"

defendants herein, conspired with each other, with Co-conspirator A, and with others known and unknown to the Grand Jury to commit an offense against the United States, namely, to steal mail, in violation of Title 18, United States Code, Section 1708, and to possess, with intent to defraud, 15 or more unauthorized access devices, namely credit cards, thereby affecting interstate commerce, in violation of Title 18, United States Code, Section 1029(a)(3).

3. It was part of the conspiracy that defendants MAHLIK WASHINGTON and SHUNTONENESE RICHARDSON recruited USPS employees to steal mail containing credit cards.

4. It was further part of the conspiracy that defendants SHUNTONENESE RICHARDSON, LATIYAH DAVIDSON and C'ORY VONPIER McNEAL stole U.S. mail containing credit cards in order to provide those items to defendant MAHLIK WASHINGTON and others in exchange for cash.

5. It was further part of the conspiracy that defendant MAHLIK WASHINGTON, Co-Conspirator A, and others unlawfully obtained USPS customer personal identifying information ("PII"), including USPS customer names, dates of birth, social security numbers, and addresses.

6. It was further part of the conspiracy that defendant MAHLIK WASHINGTON and others known and unknown to the Grand Jury used USPS customer PII to fraudulently activate and use the stolen credit cards provided by defendants SHUNTONESE RICHARDSON, LATIYAH DAVIDSON and C'ORY VONPIER McNEAL.

7. It was further part of the conspiracy that defendant MAHLIK WASHINGTON and others known and unknown to the Grand Jury used the fraudulently obtained credit cards to make purchases without authorization.

Overt Acts

8. In furtherance of and to effect the objects of the conspiracy, defendants MAHLIK WASHINGTON, SHUNTONESE RICHARDSON, LATIYAH DAVIDSON, and C'ORY VONPIER McNEAL committed and caused to be committed the following overt acts, among others, in the Northern District of Illinois:

a. From in or around December 2018, and continuing through in or around November 2019, defendants MAHLIK WASHINGTON, SHUNTONESE RICHARDSON, LATIYAH DAVIDSON, C'ORY VONPIER McNEAL, and others known and unknown to the Grand Jury exchanged messages on their cellular phones concerning the theft of U.S. mail containing credit cards.

b. On or about June 7, 2019, defendant MAHLIK WASHINGTON sent messages to Co-Conspirator A's cellular phone containing images of mail addressed to numerous victims, including Victim EE.

c. On or about June 9, 2019, Co-Conspirator A sent messages to defendant MAHLIK WASHINGTON containing PII for numerous victims, including Victim EE.

d. On or about June 20, 2019, defendant C'ORY VONPIER McNEAL stole approximately 60 pieces of U.S. Mail from the Palatine P&DC.

e. On or about June 23, 2019, defendant C'ORY VONPIER McNEAL stole approximately 50 pieces of U.S. Mail from the Palatine P&DC.

f. On or about June 23, 2019, defendant C'ORY VONPIER McNEAL gave the stolen mail to defendant LATIYAH DAVIDSON in exchange for cash.

g. On or about June 24, 2019, defendant C'ORY VONPIER McNEAL stole approximately 20 pieces of U.S. Mail from the Palatine P&DC.

h. On or about July 8, 2019, defendant C'ORY VONPIER McNEAL stole more than 200 pieces of U.S. Mail from the Palatine P&DC.

i. On or about July 12, 2019, defendant LATIYAH DAVIDSON possessed credit cards belonging to Victim CG, Victim JR, Victim MM, Victim AU, Victim MN, Victim MC, Victim CH, and Victim RD.

j. On or about October 26, 2019, defendant MAHLIK WASHINGTON sent a message to defendant SHUNTONESE RICHARDSON's cellular phone containing images of mail addressed to numerous victims, including Victim VD.

k. On or about November 20, 2019, defendant SHUNTONESE RICHARDSON stole more than 60 pieces of U.S. Mail from the Palatine P&DC.

9. It was further part of the conspiracy that defendants MAHLIK WASHINGTON, SHUNTONESE RICHARDSON, LATIYAH DAVIDSON, and C'ORY VONPIER McNEAL concealed and hid, and caused to be concealed and hidden, the purposes of the acts done in furtherance of the conspiracy.

In violation of Title 18, United States Code, Section 371.

COUNT TWO

The SPECIAL JULY 2021 GRAND JURY further charges:

On or about July 8, 2019, at Chicago, in the Northern District of Illinois,
Eastern Division,

C'ORY VONPIER McNEAL,

defendant herein, did knowingly steal and take from and out of the mail, a letter,
package and mail, namely more than 200 pieces of mail, including one piece of mail
addressed to Victim BN;

In violation of Title 18, United States Code, Section 1708.

COUNT THREE

The SPECIAL JULY 2021 GRAND JURY further charges:

On or about July 12, 2019, at Chicago, in the Northern District of Illinois,
Eastern Division,

LATIYAH DAVIDSON,

defendant herein, did knowingly receive and possess mail, that previously had been
stolen from a mail route, and that defendant knew previously had been stolen, namely
one piece of mail addressed to Victim MM;

In violation of Title 18, United States Code, Section 1708.

COUNT FOUR

The SPECIAL JULY 2021 GRAND JURY further charges:

On or about October 26, 2019, at Chicago, in the Northern District of Illinois,
Eastern Division,

MAHLIK WASHINGTON,

defendant herein, did knowingly receive and possess mail, that previously had been
stolen from a mail route, and that defendant knew previously had been stolen, namely
one piece of mail addressed to Victim VD;

In violation of Title 18, United States Code, Section 1708.

COUNT FIVE

The SPECIAL JULY 2021 GRAND JURY further charges:

On or about November 20, 2019, at Chicago, in the Northern District of Illinois,
Eastern Division,

SHUNTONESE RICHARDSON,

defendant herein, did knowingly steal and take from and out of the mail, a letter,
package and mail, namely over 60 pieces of mail, including one piece of mail
addressed to Victim RW;

In violation of Title 18, United States Code, Section 1708.

A TRUE BILL:

FOREPERSON

Signed by Matthew F. Madden on behalf of the
UNITED STATES ATTORNEY