

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA) No. 17 CR 338
)
) Violations: Title 18, United States Code,
) Section 1344
)
KIERRE PERKINS,)
STEVEN VANCE,)
IAN MYVETT,)
LAMONTE POWELL,)
TOREY MARTIN, and)
JERMEL SANDERS)

COUNT ONE

The SPECIAL AUGUST 2015 GRAND JURY charges:

1. At times material to this indictment:

a. USAA Federal Savings Bank (“USAA Bank”) was a financial institution which served customers in Chicago, Illinois, and elsewhere, the deposits of which were insured by the Federal Deposit Insurance Corporation.

b. USAA Bank members were able to make deposits to and withdrawals from their accounts in several ways, including by using: (i) USAA Bank’s mobile banking application which allows USAA Bank members to make deposits remotely by uploading images of checks to their account through the application; (ii) ATM machines operated both by USAA Bank and as well as other institutions which allowed USAA Bank members to deposit checks, conduct balance inquiries, and withdraw funds; and (iii) United Parcel Service (“UPS”) retail stores at which USAA Bank members could present checks in their name, along with their debit card,

and which would then be processed by the UPS store and deposited into USAA Bank members' accounts.

c. Once checks were successfully deposited into a USAA Bank member's account, USAA Bank would make a portion of funds from that check available for immediate withdrawal based on the expectation that the funds from the deposited check would be brought into the USAA Bank member's account from the account on which the deposited check was drawn.

2. Beginning no later than in or around November 2014, and continuing until on or about May 23, 2017, in the Northern District of Illinois, Eastern Division, and elsewhere,

KIERRE PERKINS,
STEVEN VANCE,
IAN MYVETT,
LAMONTE POWELL,
TOREY MARTIN, and
JERMEL SANDERS,

defendants herein, and others known and unknown to the Grand Jury, knowingly participated in a scheme to defraud a financial institution and to obtain money and funds owed by and under the custody and control of a financial institution by means of materially false and fraudulent pretenses, representations, and promises, which scheme is further described in the following paragraphs.

3. It was part of the scheme that defendants in Chicago and elsewhere recruited and caused to be recruited, including by way of false pretenses, USAA Bank members through social media and other means, to gain access to their USAA Bank

accounts for the purpose of depositing counterfeited checks to their accounts to falsely inflate the amount of available funds in the accounts and then withdrawing a portion of those funds from the accounts before the checks were identified as counterfeited.

4. It was further part of the scheme that defendants caused USAA Bank members to provide them with personal information needed to access their USAA Bank accounts, including usernames, passwords, and answers to account security questions. In order to entice USAA Bank members to provide this information, defendants told and caused to be told to the USAA Bank members false and misleading statements regarding the reason why defendants needed access to the USAA Bank members accounts and, at times, used false online personas.

5. It was further part of the scheme that defendants used, and caused others to use, the personal information obtained from the USAA Bank members to gain access to the accounts of the USAA Bank members for the purpose of attempting to deposit and depositing counterfeited checks into their accounts.

6. It was further part of the scheme that defendants obtained debit cards for the USAA Bank members' accounts by (i) ordering replacement debit cards once they had access to the accounts and (ii) enticing the USAA Bank members to send their debit cards to defendants and others by means of false and misleading statements to the USAA Bank members.

7. It was further part of the scheme that defendants obtained, produced, and caused to be produced counterfeited checks. These checks included account and

routing information for real bank accounts which defendants used without the knowledge and permission of the real account holders. In addition, defendants added false information to the counterfeited checks, including, but not limited to, the name of the purported maker of the check as well as the purported signature of the USAA Bank member into whose account the check was deposited.

8. It was further part of the scheme that defendants used USAA Bank's mobile banking application, ATMs of USAA Bank and other banks, and UPS retail stores to upload and deposit the counterfeited checks into the USAA Bank members' accounts, which checks were presented by defendants to USAA Bank as legitimate checks.

9. It was further part of the scheme that defendants would at times travel outside of the Northern District of Illinois for the purpose of uploading counterfeited checks.

10. It was further part of the scheme that defendants used these counterfeited checks to fraudulently inflate or attempt to inflate account balances in USAA Bank members' accounts.

11. It was further part of the scheme that defendants withdrew or caused to be withdrawn from USAA Bank members' accounts funds constituting the proceeds of the scheme, portions of which defendants kept for themselves.

12. It was further part of the scheme that defendants' actions exposed USAA Bank to a risk of loss and caused actual losses to USAA Bank.

13. It was further part of the scheme that defendants 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.

14. On or about December 3, 2014, at Tinley Park, in the Northern District of Illinois, Eastern Division, and elsewhere,

LAMONTE POWELL,

defendant herein, knowingly executed and attempted to execute the above-described scheme by causing to be deposited a check, numbered 0553, in amount of \$1,529.47 into the USAA Bank account for Individual A ending in 8283.

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

COUNT TWO

The SPECIAL AUGUST 2015 GRAND JURY further charges:

1. The allegations in Paragraphs 1 through 13 are hereby realleged and incorporated as if fully set forth herein.

2. On or about December 3, 2014, at Tinley Park, in the Northern District of Illinois, Eastern Division, and elsewhere,

LAMONTE POWELL,

defendant herein, knowingly executed and attempted to execute the above-described scheme by causing to be deposited a check, numbered 0554, in amount of \$1,513.07 into the USAA Bank account for Individual A ending in 8283.

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

COUNT THREE

The SPECIAL AUGUST 2015 GRAND JURY further charges:

1. The allegations in Paragraphs 1 through 13 are hereby realleged and incorporated as if fully set forth herein.

2. On or about December 3, 2014, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

LAMONTE POWELL,

defendant herein, knowingly executed and attempted to execute the above-described scheme by causing the withdrawal of approximately \$403.00 from the USAA Bank Account of Individual A ending in 8283.

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

COUNTS FOUR AND FIVE

The SPECIAL AUGUST 2015 GRAND JURY further charges:

1. The allegations in Paragraphs 1 through 13 are hereby realleged and incorporated as if fully set forth herein.

2. On or about December 8, 2014, at Tinley Park, in the Northern District of Illinois, Eastern Division, and elsewhere,

LAMONTE POWELL,

defendant herein, knowingly executed and attempted to execute the above-described scheme by causing to be deposited checks into the USAA Bank account for Individual B ending in 4714 as set forth:

Counts	Check Number	Amount
4	1009	\$1,567.41
5	1010	\$1,511.16

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

COUNT SIX

The SPECIAL AUGUST 2015 GRAND JURY further charges:

1. The allegations in Paragraphs 1 through 13 are hereby realleged and incorporated as if fully set forth herein.

2. On or about January 5, 2015, at Calumet City, in the Northern District of Illinois, Eastern Division, and elsewhere,

TOREY MARTIN,

defendant herein, knowingly executed and attempted to execute the above-described scheme by causing to be deposited a check, numbered 0791, in amount of \$2,007.44 into the USAA Bank account for Individual C ending in 3525.

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

COUNTS SEVEN AND EIGHT

The SPECIAL AUGUST 2015 GRAND JURY further charges:

1. The allegations in Paragraphs 1 through 13 are hereby realleged and incorporated as if fully set forth herein.

2. On or about November 5, 2015, at Calumet City, in the Northern District of Illinois, Eastern Division, and elsewhere,

TOREY MARTIN,

defendant herein, knowingly executed and attempted to execute the above-described scheme by causing to be deposited checks into the USAA Bank account for Individual D ending in 9818 as set forth:

Count	Check Number	Amount
7	00109108	\$2,243.16
8	00109109	\$2,300.00

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

COUNT NINE

The SPECIAL AUGUST 2015 GRAND JURY further charges:

1. The allegations in Paragraphs 1 through 13 are hereby realleged and incorporated as if fully set forth herein.

2. On or about November 24, 2015, at Calumet City, in the Northern District of Illinois, Eastern Division, and elsewhere,

TOREY MARTIN,

defendant herein, knowingly executed and attempted to execute the above-described scheme by causing to be deposited a check, numbered 00333, in amount of \$1,000.00 into the USAA Bank account for Individual E ending in 5695.

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

COUNT TEN

The SPECIAL AUGUST 2015 GRAND JURY further charges:

1. The allegations in Paragraphs 1 through 13 are hereby realleged and incorporated as if fully set forth herein.

2. On or about November 24, 2015, at Calumet City, in the Northern District of Illinois, Eastern Division, and elsewhere,

TOREY MARTIN,

defendant herein, knowingly executed and attempted to execute the above-described scheme by causing to be deposited a check, numbered 00444, in amount of \$2,000.00 into the USAA Bank account for Individual F ending in 1243.

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

COUNTS ELEVEN AND TWELVE

The SPECIAL AUGUST 2015 GRAND JURY further charges:

1. The allegations in Paragraphs 1 through 13 are hereby realleged and incorporated as if fully set forth herein.

2. On or about December 15, 2015, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

JERMEL SANDERS,

defendant herein, knowingly executed and attempted to execute the above-described scheme by attempting to cause the withdrawal from the USAA Bank account of Individual G ending in 5762 in the approximate amounts and at the approximate times set forth:

Count	Approximate Amount	Approximate Time (Central)
11	\$1,003.00	5:24 p.m.
12	\$3,003.00	5:24 p.m.

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

COUNT THIRTEEN

The SPECIAL AUGUST 2015 GRAND JURY further charges:

1. The allegations in Paragraphs 1 through 13 are hereby realleged and incorporated as if fully set forth herein.

2. On or about February 21, 2016, in the Northern District of Illinois, Eastern Division, and elsewhere,

IAN MYVETT,

defendant herein, knowingly executed and attempted to execute the above-described scheme by causing the withdrawal of approximately \$603.00 from the USAA Bank account of Individual H ending in 4688.

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

COUNTS FOURTEEN THROUGH TWENTY

The SPECIAL AUGUST 2015 GRAND JURY further charges:

1. The allegations in Paragraphs 1 through 13 are hereby realleged and incorporated as if fully set forth herein.

2. On or about May 12, 2016, in the Northern District of Illinois, Eastern Division, and elsewhere,

IAN MYVETT and
STEVEN VANCE,

defendants herein, knowingly executed and attempted to execute the above-described scheme by causing the withdrawal of funds from the USAA Bank account of Individual I ending in 1953 in the approximate amounts and at the approximate times set forth:

Count	Approximate Amount	Approximate Time (Central)
14	\$803.00	3:10 p.m.
15	\$803.00	3:11 p.m.
16	\$803.00	3:12 p.m.
17	\$803.00	3:13 p.m.
18	\$803.00	3:14 p.m.
19	\$803.00	3:15 p.m.
20	\$203.00	3:15 p.m.

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

COUNTS TWENTY-ONE THROUGH TWENTY-TWO

The SPECIAL AUGUST 2015 GRAND JURY further charges:

1. The allegations in Paragraphs 1 through 13 are hereby realleged and incorporated as if fully set forth herein.

2. On or about August 8, 2016, at Matteson, in the Northern District of Illinois, Eastern Division, and elsewhere,

KIERRE PERKINS and
STEVEN VANCE,

defendants herein, knowingly executed and attempted to execute the above-described scheme by causing to be deposited checks into the USAA Bank account for Individual J ending in 0234 as set forth:

Count	Check Number	Amount
21	0001120560	\$1,700.00
22	0001120561	\$1,700.00

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

COUNT TWENTY-THREE

The SPECIAL AUGUST 2015 GRAND JURY further charges:

1. The allegations in Paragraphs 1 through 13 are hereby realleged and incorporated as if fully set forth herein.

2. On or about August 8, 2016, at Matteson, in the Northern District of Illinois, Eastern Division, and elsewhere,

KIERRE PERKINS and
STEVEN VANCE,

defendants herein, knowingly executed and attempted to execute the above-described scheme by causing to be deposited a check, numbered 1120562, in amount of \$1,700.00 into the USAA Bank account for Individual J ending in 5508.

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

COUNTS TWENTY-FOUR THROUGH THIRTY

The SPECIAL AUGUST 2015 GRAND JURY further charges:

1. The allegations in Paragraphs 1 through 13 are hereby realleged and incorporated as if fully set forth herein.

2. On or about August 9, 2016, at Matteson, in the Northern District of Illinois, Eastern Division, and elsewhere,

KIERRE PERKINS and
STEVEN VANCE,

defendants herein, knowingly executed and attempted to execute the above-described scheme by causing the withdrawal from the USAA Bank account of Individual J ending in 0234 in the approximate amounts and at the approximate times set forth:

Count	Approximate Amount	Approximate Time (Central)
24	\$500.00	12:11 a.m.
25	\$800.00	12:11 a.m.
26	\$800.00	12:12 a.m.
27	\$800.00	12:13 a.m.
28	\$800.00	12:13 a.m.
29	\$500.00	12:15 a.m.
30	\$250.00	12:16 a.m.

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

COUNTS THIRTY-ONE THROUGH THIRTY-SEVEN

The SPECIAL AUGUST 2015 GRAND JURY further charges:

1. The allegations in Paragraphs 1 through 13 are hereby realleged and incorporated as if fully set forth herein.

2. On or about August 10, 2016, at Matteson, in the Northern District of Illinois, Eastern Division, and elsewhere,

KIERRE PERKINS,

defendant herein, knowingly executed and attempted to execute the above-described scheme by causing the withdrawal from the USAA Bank account of Individual J ending in 0234 in the approximate amounts and at the approximate times set forth:

Count	Approximate Amount	Approximate Time (Central)
31	\$500.00	1:27 a.m.
32	\$800.00	1:28 a.m.
33	\$800.00	1:29 a.m.
34	\$800.00	1:30 a.m.
35	\$800.00	1:31 a.m.
36	\$800.00	1:31 a.m.
37	\$420.00	1:32 a.m.

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

COUNTS THIRTY-EIGHT THROUGH FORTY

The SPECIAL AUGUST 2015 GRAND JURY further charges:

1. The allegations in Paragraphs 1 through 13 are hereby realleged and incorporated as if fully set forth herein.

2. On or about August 11, 2016, at South Holland, in the Northern District of Illinois, Eastern Division, and elsewhere,

KIERRE PERKINS,

defendant herein, knowingly executed and attempted to execute the above-described scheme by causing to be deposited checks into the USAA Bank account for Individual J ending in 0234 as set forth:

Count	Check Number	Amount
38	00426630021	\$1,500.00
39	00426630022	\$1,500.00
40	00426630023	\$1,500.00

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

COUNTS FORTY-ONE THROUGH FORTY-FOUR

The SPECIAL AUGUST 2015 GRAND JURY further charges:

1. The allegations in Paragraphs 1 through 13 are hereby realleged and incorporated as if fully set forth herein.

2. On or about August 12, 2016, at South Holland, in the Northern District of Illinois, Eastern Division, and elsewhere,

KIERRE PERKINS,

defendant herein, knowingly executed and attempted to execute the above-described scheme by causing to be deposited checks into the USAA Bank account for Individual J ending in 0234 as set forth:

Count	Check Number	Amount
41	00426630081	\$1,500.00
42	00426630082	\$1,500.00
43	00426630083	\$1,500.00
44	00426630084	\$500.00

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

COUNTS FORTY-FIVE THROUGH FORTY-EIGHT

The SPECIAL AUGUST 2015 GRAND JURY further charges:

1. The allegations in Paragraphs 1 through 13 are hereby realleged and incorporated as if fully set forth herein.

2. On or about August 10, 2016, at Matteson, in the Northern District of Illinois, Eastern Division, and elsewhere,

KIERRE PERKINS,

defendant herein, knowingly executed and attempted to execute the above-described scheme by causing to be deposited checks into the USAA Bank account for Individual K ending in 8447 as set forth:

Count	Check Number	Amount
45	00426626001	\$1,400.00
46	00426626011	\$1,400.00
47	00426626021	\$1,400.00
48	00426626031	\$1,400.00

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

COUNT FORTY-NINE

The SPECIAL AUGUST 2015 GRAND JURY further charges:

1. The allegations in Paragraphs 1 through 13 are hereby realleged and incorporated as if fully set forth herein.

2. On or about August 10, 2016, at Matteson, in the Northern District of Illinois, Eastern Division, and elsewhere,

KIERRE PERKINS,

defendant herein, knowingly executed and attempted to execute the above-described scheme by causing the withdrawal of approximately \$800.00 from the USAA Bank account of Individual K ending in 8447.

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

COUNT FIFTY

The SPECIAL AUGUST 2015 GRAND JURY further charges:

1. The allegations in Paragraphs 1 through 13 are hereby realleged and incorporated as if fully set forth herein.

2. On or about December 12, 2016, in the Northern District of Illinois, Eastern Division, and elsewhere,

STEVEN VANCE,

defendant herein, knowingly executed and attempted to execute the above-described scheme by causing to be deposited a check, numbered 4395, in amount of \$3,000.00 into the USAA Bank account for Individual K ending in 4168.

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

COUNT FIFTY-ONE

The SPECIAL AUGUST 2015 GRAND JURY further charges:

1. The allegations in Paragraphs 1 through 13 are hereby realleged and incorporated as if fully set forth herein.

2. On or about December 12, 2016, in the Northern District of Illinois, Eastern Division, and elsewhere,

STEVEN VANCE,

defendant herein, knowingly executed and attempted to execute the above-described scheme by causing to be deposited a check, numbered 4396, in amount of \$3,200.00 into the USAA Bank account for Individual K ending in 4141.

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

COUNT FIFTY-TWO

The SPECIAL AUGUST 2015 GRAND JURY further charges:

1. The allegations in Paragraphs 1 through 13 are hereby realleged and incorporated as if fully set forth herein.

2. On or about December 12, 2016, in the Northern District of Illinois, Eastern Division, and elsewhere,

STEVEN VANCE,

defendant herein, knowingly executed and attempted to execute the above-described scheme by causing the withdrawal of approximately \$500 from the USAA Bank account of Individual K ending in 4141.

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

COUNT FIFTY-THREE

The SPECIAL AUGUST 2015 GRAND JURY further charges:

1. The allegations in Paragraphs 1 through 13 are hereby realleged and incorporated as if fully set forth herein.

2. On or about December 12, 2016, in the Northern District of Illinois, Eastern Division, and elsewhere,

STEVEN VANCE,

defendant herein, knowingly executed and attempted to execute the above-described scheme by causing the withdrawal of approximately \$100 from the USAA Bank account of Individual K ending in 4168.

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

FORFEITURE ALLEGATION

The SPECIAL AUGUST 2015 GRAND JURY further alleges:

1. Upon conviction of an offense in violation of Title 18, United States Code, Section 1344, as set forth in this Indictment, defendants 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, at least \$832,245.53 in United States currency.

3. If any of the property described above, as a result of any act or omission by a 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

ACTING UNITED STATES ATTORNEY