

FILED

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CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF OHIO
CLEVELAND

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

DIONTAE WALLACE,
ADRIENNE CAMPBELL,
JOVANNA BROWN,
MARCELLUS SMITH,
JAMES LUKE,
GLENN KING, JR.,
SHIRLEY LADSON, and
JOSEPH BROWN,

Defendants.

INDICTMENT

JUDGE POLSTER

1:21 CR 277

CASE NO.

Title 18, United States Code,
Sections 1028A, 1029(a)(2) and
1029(b)(2)

GENERAL ALLEGATIONS

At all times material to this Indictment:

1. DIONTAE WALLACE, ADRIENNE CAMPBELL, JOVANNA BROWN, MARCELLUS SMITH, JAMES LUKE, GLENN KING, JR., SHIRLEY LADSON, and JOSEPH BROWN resided in the Northern District of Ohio, Eastern Division.
2. DIONTAE WALLACE recruited a number of conspirators in Cleveland, Ohio, and elsewhere, including ADRIENNE CAMPBELL, JOVANNA BROWN, MARCELLUS SMITH, JAMES LUKE, GLENN KING, JR., SHIRLEY LADSON, and JOSEPH BROWN to participate in a scheme to use stolen and fraudulently opened credit accounts to purchase various retail items, including large construction and contracting materials, appliances, and equipment.
3. DIONTAE WALLACE sold the fraudulently purchased items to others and used the proceeds of the sales to pay his conspirators and for his own benefit.

COUNT 1

(Conspiracy to Commit Access Device Fraud, Title 18, United States Code, Section 1029(b)(2))

The Grand Jury charges:

4. The factual allegations of paragraphs 1 through 3 of this Information are realleged and incorporated by reference as if fully set forth herein.

5. A “means of identification” means any name or number that may be used, alone or in conjunction with any other information, to identify a specific individual, including a person’s name, Social Security Account Number, date of birth or state or government issued driver’s license or identification number.

6. As defined in Title 18, United States Code, Section 1029(e)

- a. “Access Device” includes any card, plate, code, account number, electronic serial number, personal identification number or other means of account access that can be used alone or in conjunction with another access device to obtain money, goods, services, or any other thing of value, or that can be used to initiate a transfer of funds (other than a transfer originated solely by paper instrument);
- b. “Unauthorized access device” means any access device that is lost, stolen, expired, revoked, cancelled or obtained with the intent to defraud.

7. From in or about December 2016 and continuing through approximately April 22, 2020, in the Northern District of Ohio, Eastern Division and elsewhere, Defendants DIONTAE WALLACE, ADRIENNE CAMPBELL, JOVANNA BROWN, MARCELLUS SMITH, JAMES LUKE, GLENN KING, JR., SHIRLEY LADSON, JOSEPH BROWN, and others known and unknown to the grand jury, did knowingly and intentionally combine, conspire, confederate, and agree together and with each other, to:

knowingly and with the intent to defraud, use one or more unauthorized access devices, as defined in Title 18, United States Code, Section 1029(e)(3), to wit: fraudulently obtained credit and debit card account numbers, and by such conduct, did obtain goods and services, their value totaling \$1,000 or more, such use affecting interstate commerce, all in violation of Title 18, United States Code, Section 1029(a)(2).

OBJECT OF THE CONSPIRACY

8. It was the object of the conspiracy that Defendants DIONTAE WALLACE, ADRIENNE CAMPBELL, JOVANNA BROWN, MARCELLUS SMITH, JAMES LUKE, GLENN KING, JR., SHIRLEY LADSON, JOSEPH BROWN, and others known and unknown to the grand jury, enriched themselves and others by using stolen and fraudulently obtained credit card accounts to obtain merchandise and other things of value from industrial and non-industrial retail stores, hotels, and other companies in the Northern District of Ohio, Eastern Division, and elsewhere.

MANNER AND MEANS OF THE CONSPIRACY

9. It was part of the conspiracy that:
- a. DIONTAE WALLACE purchased personal identifying and credit card information of others from the dark web.
 - b. DIONTAE WALLACE used that information to make fraudulent identification cards bearing the stolen personal identifying information and the photographs of his conspirators. DIONTAE WALLACE also used the stolen personal identifying information to create fraudulent credit cards.

- c. DIONTAE WALLACE provided the fraudulent identification cards and credit cards to his conspirators to use at his direction.
- d. DIONTAE WALLACE, ADRIENNE CAMPBELL, JOVANNA BROWN, MARCELLUS SMITH, JAMES LUKE, GLENN KING, JR., SHIRLEY LADSON, JOSEPH BROWN, and others known and unknown to the grand jury, used the stolen personal identifying information, and the identification cards that DIONTAE WALLACE made, to open fraudulent credit accounts in the names of others.
- e. DIONTAE WALLACE, ADRIENNE CAMPBELL, JOVANNA BROWN, MARCELLUS SMITH, JAMES LUKE, GLENN KING, JR., SHIRLEY LADSON, JOSEPH BROWN, and others known and unknown to the grand jury, used the fraudulent and stolen credit card accounts to purchase merchandise and services exceeding \$1000, including but not limited to clothing, construction equipment, and household appliances.
- f. DIONTAE WALLACE, ADRIENNE CAMPBELL, JOVANNA BROWN, MARCELLUS SMITH, JAMES LUKE, GLENN KING, JR., SHIRLEY LADSON, JOSEPH BROWN, and others known and unknown to the grand jury made the purchases online or in store, often presenting stolen or fraudulently made identification cards bearing the stolen information of other individuals. If the materials were purchased online, they would pick up the materials from a local store. Often times, they transported the products ordered to DIONATE WALLACE's residence or

ADRIENNE CAMPBELL's residence using trucks that they rented using fraudulent and stolen credit accounts.

- g. DIONTAE WALLACE then sold the stolen materials, appliances, and equipment to others. DIONTAE WALLACE used the proceeds of the sales for his own personal benefit and also to pay MARCELLUS SMITH, JAMES LUKE, GLENN KING, JR., SHIRLEY LADSON, and others known and unknown to the grand jury for their participation in the scheme.
- h. DIONTAE WALLACE, ADRIENNE CAMPBELL, JOVANNA BROWN, MARCELLUS SMITH, JAMES LUKE, GLENN KING, JR., SHIRLEY LADSON, JOSEPH BROWN, and others known and unknown to the grand jury also used stolen and fraudulent credit accounts to purchase, both online and in store materials such as clothing, household items, and craft supplies, which they kept for their own personal benefit.

ACTS IN FURTHERANCE OF THE CONSPIRACY

10. In furtherance of the conspiracy and to achieve its objectives, DIONTAE WALLACE, ADRIENNE CAMPBELL, JOVANNA BROWN, MARCELLUS SMITH, JAMES LUKE, GLENN KING, JR., SHIRLEY LADSON, JOSEPH BROWN, and others known and unknown to the grand jury committed the following overt acts, among others, in the Northern District of Ohio, Eastern Division, and elsewhere:

Diontae Wallace

11. On or about December 5, 2016, DIONTAE WALLACE used a MasterCard, account number -0123, in the name of D.D., to purchase materials from Lowes, Northfield, Ohio, in an amount exceeding \$1,000.00.

12. On or about December 6, 2016, DIONTAE WALLACE used a MasterCard, account number -0123, in the name of D.D., to purchase materials from Lowes, Streetsboro, Ohio, in an amount exceeding \$1,000.00.

13. On or about June 28, 2017, DIONTAE WALLACE used a MasterCard, account number -2901, in the name of C.F., to purchase materials from Carpet Capitol Inc., Cleveland, Ohio, in an amount exceeding \$1,000.00. MARCELLUS SMITH picked up the materials.

14. On or about July 19, 2017, DIONTAE WALLACE used a MasterCard, account number -8073, in the name of K.E., to purchase materials from Home Depot, Maple Heights, Ohio, in an amount exceeding \$1,000.00. MARCELLUS SMITH picked up the materials.

15. On or about July 20, 2017, DIONTAE WALLACE used a MasterCard, account number -8073, in the name of K.E., to purchase materials from Home Depot, Maple Heights, Ohio, in an amount exceeding \$1,000.00. MARCELLUS SMITH picked up the materials.

16. On or about November 16, 2017, DIONTAE WALLACE used a credit card, account number -7910, in the name of J.H., to purchase materials from Huster Vinyl, Humphrey, NE, in an amount exceeding \$1,000.00.

17. On or about December 6, 2017, DIONTAE WALLACE used a Visa card, account number -7482, to purchase materials from Hardwareonlinestores.com, in an amount exceeding \$1,000.00.

18. On or about December 6, 2017, DIONTAE WALLACE used a credit card, account number -1242, in the name of J.F., to purchase tickets to Cedar Point, Sandusky, Ohio, in an amount exceeding \$1,000.00.

19. On or about August 5, 2017, DIONTAE WALLACE used a Visa card, account number -4257, in the name of M.J., to purchase materials from Villa, Maple Heights, Ohio.

20. On or about August 14, 2018, DIONTAE WALLACE used a Visa card, account number -2939, in the name of S.P., to purchase materials from Republic A-1 Auto Parts, Cleveland, Ohio. MARCELLUS SMITH picked up the order.

21. On or about January 17, 2018, DIONTAE WALLACE used a credit card, account number -8344, in the name of C.A., to purchase materials from Husker Vinyl, Humphrey, NE, in an amount exceeding \$1,000.00.

22. On or about March 5, 2018, DIONTAE WALLACE used a Visa card, account number -3979, in the name of J.B., to rent a truck from Penske, Wickliffe, Ohio, in an amount exceeding \$1,000.00.

23. On or about March 14, 2018, DIONTAE WALLACE used a Greendot MasterCard, account number -2989, in the name of J.B., to purchase 16 semi-tires from Raney Tire, Valley View, Ohio, in an amount exceeding \$1,000.00.

24. On or about March 14, 2018, DIONTAE WALLACE attempted to use a MasterCard, account number -3319, in the name of J.B., to purchase materials from Lumber Liquidators, Cleveland, Ohio, in an amount exceeding \$1,000.00.

25. On or about March 16, 2018, DIONTAE WALLACE used a Mastercard, account number -6163, in the name of SMG Contractors, to purchase materials from Lumber Liquidators, Mentor, Ohio, in an amount exceeding \$1,000.00.

26. On or about March 23, 2018, DIONTAE WALLACE used a MasterCard, account number -3319, in the name of J.B., to purchase tires from Goodyear Tire, Walton Hills, Ohio, in an amount exceeding \$1,000.00. In so doing, he used J.B.'s driver's license.

27. On or about April 17, 2018, DIONTAE WALLACE used a driver's license bearing J.B.'s personal identifying information, as well as J.B.'s Social Security Number, to rent a storage unit at LifeStorage, Cleveland, Ohio.

28. On or about August 2, 2019, DIONTAE WALLACE used a Visa card, account number -2676, in the name of M.B., to purchase tickets from Playhouse Square, Cleveland, Ohio, in an amount exceeding \$1,000.00.

29. On or about August 7, 2019, DIONTAE WALLACE used a credit card, account number -7724, in the name of W.C., to purchase materials from Apollo Siding, Willoughby, Ohio, in an amount exceeding \$1,000.00.

30. On or about October 8, 2018, DIONTAE WALLACE used a MasterCard, account number -5788, in the name of TAKKT America Holding, Inc., to purchase materials from Central Restaurant Products, Indianapolis, Indiana, in an amount exceeding \$1,000.00.

31. On or about November 7, 2018, DIONTAE WALLACE used a MasterCard, account number -2299, in the name of E.L., to purchase kitchen cabinets from Wholesale Cabinets, Naples, Florida, in an amount exceeding \$1,000.00.

32. On or about November 24, 2018, DIONTAE WALLACE used a MasterCard, account number -9747, in the name of R.K., to purchase kitchen cabinets from Wholesale Cabinets, Naples, Florida, in an amount exceeding \$1,000.00.

33. On or about February 9, 2019, DIONTAE WALLACE used a MasterCard, account number -6804, in the name of W.J., to purchase kitchen cabinets from Wholesale Cabinets, Naples, Florida, in an amount exceeding \$1,000.00.

34. On or about September 26, 2019, DIONTAE WALLACE used a credit card, account number -2817, in the name of D.R., to purchase materials from ABC Supply Co., Columbus, Ohio, in an amount exceeding \$1,000.00.

35. On or about February 15, 2020, DIONTAE WALLACE and JOVANNA BROWN used a credit card, account number 5864, in the name of A.L., to purchase products from Big Lots, Beachwood, in an amount exceeding \$1,000.00.

Adrienne Campbell

36. On or about June 9, 2017, ADRIENNE CAMPBELL picked up from Lowes in Streetsboro, Ohio, merchandise purchased with a MasterCard, account ending in -3190, in the name of E.W., in an amount exceeding \$1,000.00.

37. On or about June 14, 2017, ADRIENNE CAMPBELL picked up from Lowes in Streetsboro, Ohio, merchandise purchased with a MasterCard, account ending in -5052, in the name of E.W., in an amount exceeding \$1,000.00.

38. On or about June 25, 2017, ADRIENNE CAMPBELL picked up from Lowes in Brooklyn, Ohio, merchandise purchased with a MasterCard, account ending in -5134, in the name of E.W., in an amount exceeding \$1,000.00.

39. On or about September 28, 2017, ADRIENNE CAMPBELL used a Visa, account number -5074, in the name of D.G., to purchase materials from Lumber Liquidators, Toana, Virginia, in an amount exceeding \$1,000.00.

40. On or about January 8, 2020, ADRIENNE CAMPBELL used a Lowes credit card, account number -0948, in the name of B.B., to purchase materials from Lowes, Bedford Heights, Ohio, in an amount exceeding \$1,000.00.

41. On or about March 19, 2020, ADRIENNE CAMPBELL used a credit card, account number 3284, in the name of M.M., to purchase materials, including a washer and dryer, from Big Lots, Sandusky, Ohio, in an amount exceeding \$1,000.00.

42. On or about April 15, 2020, ADRIENNE CAMPBELL used a credit card, account number X, in the name of N.R., to purchase household items from Home Depot, Maple Heights, Ohio.

43. On or about April 16, 2020, ADRIENNE CAMPBELL used a credit card, account number-1117, in the name of N.R., to purchase materials, including lawn mowers, from Home Depot, Maple Heights, Ohio, in an amount exceeding \$1,000.00. DIONTAE WALLACE picked up the materials the same day.

44. On or about April 20, 2020, ADRIENNE CAMPBELL opened a Home Depot credit card in the name of C.B., account number -8781, at Home Depot, Highland Heights, Ohio. That same day, ADRIENNE CAMPBELL used the credit card to purchase items from the store.

45. On or about April 21, 2020, ADRIENNE CAMPBELL used the Home Depot credit card, account number -8781, in the name of C.B., to purchase items from Home Depot, Highland Heights, Ohio, in an amount exceeding \$1,000.00.

Jovanna Brown

46. On or about July 29, 2017, JOVANNA BROWN used a MasterCard, account number -7209, in the name of R.S., to pay for services at LasikPlus Vision Center, Independence, Ohio, in an amount exceeding \$1,000.00.

47. On or about February 10, 2020, JOVANNA BROWN and DIONTAE WALLACE opened a Bank of America credit card account, number -4093, in the name of K.S., in Macedonia, Ohio.

48. On or about February 15, 2020, JOVANNA BROWN and DIONTAE WALLACE used a Bank of America credit card, account number -4093, in the name of K.S., to purchase products from Target, 3535 Steelyard Dr., Cleveland, Ohio.

49. On or about February 15, 2020, JOVANNA BROWN and DIONTAE WALLACE used a Bank of America credit card, account number -4093, in the name of K.S., to purchase products from Target, 3100 W. 117th Street, Cleveland, Ohio.

50. On or about February 11, 2020, JOVANNA BROWN and DIONTAE WALLACE used a MasterCard, account number- 2800, in the name of J.B., to place an online order for materials from Michael's, in an amount exceeding \$1,000.00.

51. On or about March 21, 2020, JOVANNA BROWN and DIONTAE WALLACE used a MasterCard, account number -0710, in the name of A.L., to place an online order for materials from Michael's.

52. On or about March 27, 2020, JOVANNA BROWN and DIONTAE WALLACE used a MasterCard, account number -1276, in the name of B.J., to place an online order for materials from Michael's.

53. On or about April 10, 2020, JOVANNA BROWN and DIONTAE WALLACE used a credit card, account number -0241, in the name of J.M., to place an online order for materials from Michael's.

54. On or about April 10, 2020, JOVANNA BROWN and DIONTAE WALLACE used a credit card, account number –4266, in the name of L.S., to place an online order for materials from Michael's.

55. On or about April 14, 2020, JOVANNA BROWN and DIONTAE WALLACE used a credit card, account number –4189, in the name of S.Y., to place an online order for materials from Michael's.

56. On or about April 14, 2020, JOVANNA BROWN and DIONTAE WALLACE used a credit card, account number –4189, in the name of S.Y., to place an online order for materials from Michael's.

57. On or about April 19, 2020, JOVANNA BROWN and DIONTAE WALLACE used a MasterCard, account number –5543, in the name of J.C., to place an online order for materials from Michael's.

Marcellus Smith

58. On or about March 3, 2017, MARCELLUS SMITH used a credit card, account number -7011, to purchase merchandise from Tommy.com.

59. On or about May 2, 2017, MARCELLUS SMITH used a Visa card, account number -1398, in the name of M.G., to purchase materials from Summit Racing Equipment, Tallmadge, Ohio, in an amount exceeding \$1,000.00.

60. On or about May 2, 2017, MARCELLUS SMITH used a Visa card, account number -1398, in the name of M.G., to purchase materials from Summit Racing Equipment, Tallmadge, Ohio, in an amount exceeding \$1,000.00.

61. On or about May 3, 2017, MARCELLUS SMITH used a Visa card, account number -1398, in the name of M.G., to purchase materials from Summit Racing Equipment, Tallmadge, Ohio, in an amount exceeding \$1,000.00.

62. On or about June 26, 2017, MARCELLUS SMITH used a MasterCard, account number -3981, in the name of J.A., to purchase materials from Lumber Liquidators, Cleveland, Ohio, in an amount exceeding \$1,000.00.

63. On or about July 6, 2017, MARCELLUS SMITH use a credit card, account number -8329, to purchase materials from Northeast Factory Direct, Cleveland, Ohio, in an amount exceeding \$1,000.00.

64. On or about July 8, 2017, MARCELLUS SMITH used a credit card, account number -9703, in the name of M.K., to purchase jewelry from SIGNET Jewelry, Akron, Ohio, in an amount exceeding \$1,000.00.

65. On or about July 8, 2017, MARCELLUS SMITH used a credit card, account number -9374, to purchase materials from Lumber Liquidators Store #13, North Olmsted, Ohio, in an amount exceeding \$1,000.00.

66. On or about July 11, 2017, MARCELLUS SMITH used a credit card, account number -9976, to purchase materials from Home Depot Store #6857, Cleveland, Ohio, in an amount exceeding \$1,000.00.

67. On or about July 13, 2017, MARCELLUS SMITH used a MasterCard, account number -3595, in the name of J.M., to purchase materials from Sutton Industrial Hardware, Cleveland, Ohio, in an amount exceeding \$1,000.00.

68. On or about July 16, 2017, MARCELLUS SMITH used a Visa card, account number -7427, in the name of G.P., to purchase materials from Calvetta Brothers, Bedford Heights, Ohio, in an amount exceeding \$1,000.00.

69. On or about July 18, 2017, MARCELLUS SMITH used a credit card, account number -0328, to purchase merchandise from Villa, Philadelphia, Pennsylvania.

70. On or about July 26, 2017, MARCELLUS SMITH used a credit card, account number -8587, in the name of G.P., to purchase materials from ProSource, Beachwood, Ohio, in an amount exceeding \$1,000.00.

71. On or about July 26, 2017, MARCELLUS SMITH used a credit card, account number -8587, to purchase materials from Meny Hart Plumbing, Cleveland, Ohio, in an amount exceeding \$1,000.00.

72. On or about July 29, 2017, MARCELLUS SMITH used a credit card, account number -7038, in the name of M.B., to rent water sport equipment from Put-In-Bay Watercraft, Put-in-Bay, Ohio.

73. On or about July 30, 2017, MARCELLUS SMITH used a Visa card, account number -6561, to rent a room at Sleep Inn and Suites, Port Clinton, Ohio.

74. On or about July 31, 2017, MARCELLUS SMITH used a credit card, account number -6561, to purchase materials from All Ohio Motor SPO, Cleveland, Ohio, in an amount exceeding \$1,000.00.

75. On or about July 31, 2017, MARCELLUS SMITH used a credit card, account number -4447, to make an online purchase at www.acehardware.com, in an amount exceeding \$1,000.00.

76. On or about August 1, 2017, MARCELLUS SMITH use a credit card, account number -8469, to purchase materials from State 8 Motorcycles, Peninsula, Ohio, in an amount exceeding \$1,000.00.

77. On or about August 4, 2017, MARCELLUS SMITH used a Visa card, account number -4257, in the name of H.R., to purchase materials from Midwest Roofing, Brooklyn Heights, Ohio, in an amount exceeding \$1,000.00. JAMES LUKE picked up the materials.

78. On or about August 7, 2017, MARCELLUS SMITH used a Chase credit card, account number -1137, in the name of B.W., to purchase materials from C.C. Supply, Barberton, Ohio, in an amount exceeding \$1,000.00.

79. On or about August 8, 2017, MARCELLUS SMITH used a credit card, account number -1967, in the name of C.F., to purchase a hot tub from the Great Escape, South Holland, Illinois, in an amount exceeding \$1,000.00. The hot tub was delivered to the home of ADRIENNE CAMPBELL.

80. On or about August 15, 2017, MARCELLUS SMITH used a Visa card, account number -2161, in the name of S.P., to purchase furniture from Best Furniture, Mentor, Ohio, in an amount exceeding \$1,000.00.

81. On or about the following dates, MARCELLUS SMITH used the following credit cards to make the following online retail purchases from Lowes, all exceeding \$1,000.00, and picked up the merchandise from the following Lowes store locations:

Date	Credit Card	Account Number	Account Holder	Lowe's Pickup Location
May 14, 2017	American Express	-3007	E.M.	Brooklyn, Ohio
May 15, 2017	MasterCard	-8959	Unknown Victim	Macedonia, Ohio
May 15, 2017	MasterCard	-8959	Unknown Victim	Streetsboro, Ohio
May 25, 2017	Visa	-7707	Unknown Victim	Boardman, Ohio
May 31, 2017	Visa	-2552	Unknown Victim	Elyria, Ohio
June 9, 2017	MasterCard	-0793	M.D.	Brooklyn, Ohio
June 10, 2017	MasterCard	-7851	J.D.	Willoughby, Ohio
June 11, 2017	MasterCard	-0793	M.D.	Brooklyn, Ohio
June 12, 2017	MasterCard	-7053	A.G.	Brooklyn, Ohio
June 14, 2017	MasterCard	-7053	A.G.	Strongsville, Ohio
June 25, 2017	MasterCard	-5134	A.D.	Brooklyn, Ohio
July 11, 2017	MasterCard	-7080	A.D.	Madison Heights, Michigan
July 12, 2017	MasterCard	-4129	A.D.	McCandless, Pennsylvania
July 13, 2017	MasterCard	-0894	A.D.	Trumbull, Ohio
July 13, 2017	MasterCard	-4496	A.D.	Hermitage, Pennsylvania
July 18, 2017	MasterCard	-4496	A.D.	Erie, PA
July 20, 2017	MasterCard	-6641	A.D.	Erie, PA

James Luke

82. On or about April 18, 2017, JAMES LUKE used a Visa card, account number - 1398, in the name of M.G., to purchase materials from Summit Racing Equipment, Tallmadge, Ohio.

83. On or about May 4, 2017, JAMES LUKE used a Visa, account number -1398, in the name of M.G., to purchase materials from Summit Racing Equipment, Tallmadge, Ohio, in an amount exceeding \$1,000.00.

84. On or about November 13, 2017, JAMES LUKE used a Visa card, account number -3924, in the name of Y.K., to purchase a dirt bike from Ricky Power Sports, Carrollton, Texas.

85. On or about February 1, 2018, JAMES LUKE used a Visa card, account number -8242, in the name of D.P., to purchase materials from Midwest Roofing Supply in Brooklyn, Heights, Ohio, in an amount exceeding \$1,000.00. In so doing, he used D.P.'s driver's license.

86. On or about February 19, 2018, JAMES LUKE used a credit card, account number -2885, in the name of M.D., to rent two hotel rooms at Aloft Hotel in Beachwood, Ohio.

87. On or about February 24, 2018, JAMES LUKE used a Netspend Visa card, account number -2193, in the name of M.D., to purchase jewelry from Ashcroft and Oakes, Columbus, Ohio, in an amount exceeding \$1,000.00. In so doing, he used M.D.'s driver's license.

88. On or about March 16, 2018, JAMES LUKE attempted to use a Visa card, account number -9090, in the name of M.D., to purchase materials from Lumber Liquidators, Cleveland, Ohio, in an amount exceeding \$1,000.00.

89. On or about March 16, 2018, JAMES LUKE attempted to use a MasterCard, account number -7131, associated with an unknown victim, to purchase materials from Lumber Liquidators, Cleveland, Ohio, in an amount exceeding \$1,000.00.

90. On or about March 19, 20218, JAMES LUKE used a credit card, account number -3859, in the name of R.J., to purchase materials from Casper Sleep Inc., New York, in an amount exceeding \$1,000.00.

91. On or about March 19, 2018, JAMES LUKE used a credit card, account number -3859, in the name of R.J., to purchase materials from O-Reilly Autoparts, Nashville, TN.

92. On or about March 19, 2018, JAMES LUKE used a credit card, account number - 3859, in the name of R.J., to purchase materials from Carparts Warehouse, Warrensville, Ohio.

93. On or about March 25, 2018, JAMES LUKE used a credit card, account number - 8035, in the name of D.M., to purchase tickets from Playhouse Square, Cleveland, Ohio, in an amount exceeding \$1,000.00.

94. On or about April 13, 2018, JAMES LUKE used a credit card, account number - 3859, in the name of R.J., to purchase tickets from the Wolstein Center, Cleveland, Ohio.

Glenn King, Jr.

95. On or about May 18, 2017, GLENN KING, JR. used a MasterCard, account ending in -5709, in his own name, to purchase materials online from Lowes, in an amount exceeding \$1,000.00, which he picked up from Lowes, Stow, Ohio.

96. On or about May 23, 2017, GLENN KING, JR. used a MasterCard, account ending in -9751, in his own name, to purchase materials online from Lowes, in an amount exceeding \$1,000.00, which he picked up from Lowes, Canton, Ohio.

97. On or about June 5, 2017, GLENN KING, JR. used a MasterCard, account ending in -1917, in his own name, to purchase materials online from Lowes, in an amount exceeding \$1,000.00, which he picked up from Lowes, Dublin, Ohio.

98. On or about June 11, 2017, GLENN KING, JR. used a MasterCard, account ending in -7148, in his own name, to purchase materials online from Lowes, in an amount exceeding \$1,000.00, which he picked up from Lowes, Dublin, Ohio.

99. On or about July 17, 2017, GLENN KING, JR. and MARCELLUS SMITH used a MasterCard, account number -3506, to purchase materials from Roofing Material Wholesalers, Cleveland, Ohio, in an amount exceeding \$1,000.00.

100. On or about July 26, 2017, GLENN KING, JR. and MARCELLUS SMITH used a credit card, account number -8587, to purchase clothing from Xhibition, Cleveland, Ohio, in an amount exceeding \$1,000.00.

101. On or about July 27, 2017, GLENN KING, JR. and MARCELLUS SMITH used a Visa card, account number -6315, to purchase materials from Roofing Material Wholesalers, Cleveland, Ohio, in an amount exceeding \$1,000.00.

102. On or about July 28, 2017, GLENN KING, JR. used a MasterCard, account number -7038, in the name of M.B., to purchase a "Speed Rooter" at Menyhart Plumbing & Heating Supply in Cleveland, Ohio, in an amount exceeding \$1,000.00.

103. On or about July 28, 2017, MARCELLUS SMITH used a credit card, account number -8587, to purchase materials from Meny Hart Plumbing, Cleveland, Ohio, in an amount exceeding \$1,000.00.

104. On or about July 29, 2017, GLENN KING, JR. used a MasterCard, account number -7038, in the name of M.B., to rent two rooms at Maui Sands Resort, Sandusky, Ohio.

105. On or about July 29, 2017, GLENN KING, JR. used a MasterCard, account number -7038, in the name of M.B., to rent jet skis from Jet Express, Port Clinton, Ohio.

106. On or about August 3, 2017, GLENN KING, JR. and MARCELLUS SMITH used a Visa card, account number -4447, to purchase materials from Apollo Siding, Willoughby, Ohio, in an amount exceeding \$1,000.00.

107. On or about August 8, 2017, GLENN KING, JR. and MARCELLUS SMITH used a MasterCard, account number -6139, to purchase materials from Apollo Siding, Willoughby, Ohio, in an amount exceeding \$1,000.00.

108. On or about August 22, 2017, GLENN KING, JR. and MARCELLUS SMITH attempted to use a Visa card, account number -6990, to purchase materials from Apollo Siding, Willoughby, Ohio, in an amount exceeding \$1,000.00.

Shirley Ladson

109. On or about December 23, 2019, SHIRLEY LADSON picked up merchandise from Nordstrom, Beachwood, that was purchased used a credit card, account number -6094, in the name of K.P., in an amount exceeding \$1,000.00.

110. On or about January 5, 2020, SHIRLEY LADSON used B.B.'s name, date of birth, and Social Security Number to open credit card account number -5357 at Pier 1 in Lyndhurst, Ohio. That same day, B.B. used the credit card account to make purchases at the store, in an amount exceeding \$1,000.00.

111. On or about January 17, 2020, SHIRLEY LADSON and ADRIENNE CAMPBELL used a credit card, account number 1458, in the name of M.M., to purchase jewelry from Kay Jewelers, Parma, Ohio.

Joseph Brown

112. On or about March 19, 2020, JOSEPH BROWN created Lowes credit card, account number -2915, in the name of M.M., at Lowes, Sandusky, Ohio.

113. On or about March 19, 2020, JOSEPH BROWN and ADRIENNE CAMPBELL used a Lowes credit card, account number -2915, in the name of M.M, to purchase appliances and other merchandise from Lowes, Sandusky, Ohio, in an amount exceeding \$1,000.00.

114. On or about March 19, 2020, JOSEPH BROWN used a Lowes credit card, account number -2915, in the name of M.M, to purchase household supplies from Lowes, Lorain, Ohio.

115. On or about March 20, 2020, JOSEPH BROWN used a Lowes credit card, account number -2915, in the name of M.M, to purchase household supplies from Lowes, Elyria, Ohio, in an amount exceeding \$1,000.00.

116. On or about March 21, 2020, JOSEPH BROWN used a Lowes credit card, account number -5101, in the name D.H., to purchase appliances and other merchandise from Lowes, Bedford Heights, Ohio, in an amount exceeding \$1,000.00.

117. On or about March 21, 2020, JOSEPH BROWN used a Lowes credit card, account number -5101, in the name of D.H. to purchase appliances and other merchandise from Lowes, Brooklyn, Ohio, in an amount exceeding \$1,000.00.

118. On or about March 22, 2020, JOSEPH BROWN used a Lowes credit card, account number -5101, in the name of D.H. to purchase appliances and other merchandise from Lowes, Brooklyn, Ohio, in an amount exceeding \$1,000.00.

COUNT 2

(Access Device Fraud, 18 U.S.C. § 1029(a)(2))

The Grand Jury further charges:

119. Paragraphs 1 through 118 of this Indictment are re-alleged and incorporated by reference as if fully set forth herein.

120. From on or about December 5, 2016 to on or about November 16, 2017, in the Northern District of Ohio, Eastern Division, Defendant DIONTAE WALLACE did knowingly and with the intent to defraud, use one or more unauthorized access devices, as defined in Title 18, United States Code, Section 1029(e)(3), to wit: credit cards obtained with intent to defraud, and by such conduct, did obtain goods and services valued at \$1,000 or more, such use affecting interstate commerce, in violation of Title 18, United States Code, Sections 1029(a)(2).

COUNT 3

(Access Device Fraud, 18 U.S.C. § 1029(a)(2))

The Grand Jury further charges:

121. Paragraphs 1 through 120 of this Indictment are re-alleged and incorporated by reference as if fully set forth herein.

122. From on or about December 6, 2017 to on or about November 24, 2018, in the Northern District of Ohio, Eastern Division, Defendant DIONTAE WALLACE did knowingly and with the intent to defraud, use one or more unauthorized access devices, as defined in Title 18, United States Code, Section 1029(e)(3), to wit: credit cards obtained with intent to defraud, and by such conduct, did obtain goods and services valued at \$1,000 or more, such use affecting interstate commerce, in violation of Title 18, United States Code, Sections 1029(a)(2).

COUNT 4

(Access Device Fraud, 18 U.S.C. § 1029(a)(2))

The Grand Jury further charges:

123. Paragraphs 1 through 122 of this Indictment are re-alleged and incorporated by reference as if fully set forth herein.

124. From on or about February 9, 2019 to on or about September 26, 2019, in the Northern District of Ohio, Eastern Division, Defendant DIONTAE WALLACE did knowingly and with the intent to defraud, use one or more unauthorized access devices, as defined in Title 18, United States Code, Section 1029(e)(3), to wit: credit cards obtained with intent to defraud, and by such conduct, did obtain goods and services valued at \$1,000 or more, such use affecting interstate commerce, in violation of Title 18, United States Code, Sections 1029(a)(2).

COUNT 5

(Access Device Fraud, 18 U.S.C. § 1029(a)(2))

The Grand Jury further charges:

125. Paragraphs 1 through 124 of this Indictment are re-alleged and incorporated by reference as if fully set forth herein.

126. On or about February 15, 2020, in the Northern District of Ohio, Eastern Division, Defendant DIONTAE WALLACE did knowingly and with the intent to defraud, use one or more unauthorized access devices, as defined in Title 18, United States Code, Section 1029(e)(3), to wit: a credit card obtained with intent to defraud, and by such conduct, did obtain goods and services valued at \$1,000 or more, such use affecting interstate commerce, in violation of Title 18, United States Code, Sections 1029(a)(2).

COUNT 6

(Access Device Fraud, 18 U.S.C. § 1029(a)(2))

The Grand Jury further charges:

127. Paragraphs 1 through 126 of this Indictment are re-alleged and incorporated by reference as if fully set forth herein.

128. From on or about June 9, 2017 to on or about September 28, 2017, in the Northern District of Ohio, Eastern Division, Defendant ADRIENNE CAMPBELL did knowingly and with the intent to defraud, use one or more unauthorized access devices, as defined in Title 18, United States Code, Section 1029(e)(3), to wit: credit cards obtained with intent to defraud, and by such conduct, did obtain goods and services valued at \$1,000 or more, such use affecting interstate commerce, in violation of Title 18, United States Code, Sections 1029(a)(2).

COUNT 7

(Access Device Fraud, 18 U.S.C. § 1029(a)(2))

The Grand Jury further charges:

129. Paragraphs 1 through 128 of this Indictment are re-alleged and incorporated by reference as if fully set forth herein.

130. From on or about January 8, 2020 to on or about April 21, 2020, in the Northern District of Ohio, Eastern Division, Defendant ADRIENNE CAMPBELL did knowingly and with the intent to defraud, use one or more unauthorized access devices, as defined in Title 18, United States Code, Section 1029(e)(3), to wit: credit cards obtained with intent to defraud, and by such conduct, did obtain goods and services valued at \$1,000 or more, such use affecting interstate commerce, in violation of Title 18, United States Code, Sections 1029(a)(2).

COUNT 8

(Access Device Fraud, 18 U.S.C. § 1029(a)(2))

The Grand Jury further charges:

131. Paragraphs 1 through 130 of this Indictment are re-alleged and incorporated by reference as if fully set forth herein.

132. On or about July 29, 2017, in the Northern District of Ohio, Eastern Division, Defendant JOVANNA BROWN did knowingly and with the intent to defraud, use one or more unauthorized access devices, as defined in Title 18, United States Code, Section 1029(e)(3), to wit: a credit card obtained with intent to defraud, and by such conduct, did obtain goods and services valued at \$1,000 or more, such use affecting interstate commerce, in violation of Title 18, United States Code, Sections 1029(a)(2).

COUNT 9

(Access Device Fraud, 18 U.S.C. § 1029(a)(2))

The Grand Jury further charges:

133. Paragraphs 1 through 132 of this Indictment are re-alleged and incorporated by reference as if fully set forth herein.

134. From on or about February 10, 2020 to on or about April 19, 2020, in the Northern District of Ohio, Eastern Division, Defendant JOVANNA BROWN did knowingly and with the intent to defraud, use one or more unauthorized access devices, as defined in Title 18, United States Code, Section 1029(e)(3), to wit: credit cards obtained with intent to defraud, and by such conduct, did obtain goods and services valued at \$1,000 or more, such use affecting interstate commerce, in violation of Title 18, United States Code, Sections 1029(a)(2).

COUNT 10

(Access Device Fraud, 18 U.S.C. § 1029(a)(2))

The Grand Jury further charges:

135. Paragraphs 1 through 134 of this Indictment are re-alleged and incorporated by reference as if fully set forth herein.

136. From on or about March 3, 2018 to on or about August 15, 2017, in the Northern District of Ohio, Eastern Division, Defendant MARCELLUS SMITH did knowingly and with the intent to defraud, use one or more unauthorized access devices, as defined in Title 18, United States Code, Section 1029(e)(3), to wit: credit cards obtained with intent to defraud, and by such conduct, did obtain goods and services valued at \$1,000 or more, such use affecting interstate commerce, in violation of Title 18, United States Code, Sections 1029(a)(2).

COUNT 11

(Access Device Fraud, 18 U.S.C. § 1029(a)(2))

The Grand Jury further charges:

137. Paragraphs 1 through 136 of this Indictment are re-alleged and incorporated by reference as if fully set forth herein.

138. From on or about April 18, 2018 to on or about April 13, 2018, in the Northern District of Ohio, Eastern Division, Defendant JAMES LUKE did knowingly and with the intent to defraud, use one or more unauthorized access devices, as defined in Title 18, United States Code, Section 1029(e)(3), to wit: credit cards obtained with intent to defraud, and by such conduct, did obtain goods and services valued at \$1,000 or more, such use affecting interstate commerce, in violation of Title 18, United States Code, Sections 1029(a)(2).

COUNT 12

(Access Device Fraud, 18 U.S.C. § 1029(a)(2))

The Grand Jury further charges:

139. Paragraphs 1 through 138 of this Indictment are re-alleged and incorporated by reference as if fully set forth herein.

140. From on or about May 18, 2017 to on or about August 22, 2017, in the Northern District of Ohio, Eastern Division, Defendant GLENN KING, JR. did knowingly and with the intent to defraud, use one or more unauthorized access devices, as defined in Title 18, United States Code, Section 1029(e)(3), to wit: credit cards obtained with intent to defraud, and by such conduct, did obtain goods and services valued at \$1,000 or more, such use affecting interstate commerce, in violation of Title 18, United States Code, Sections 1029(a)(2).

COUNT 13

(Access Device Fraud, 18 U.S.C. § 1029(a)(2))

The Grand Jury further charges:

141. Paragraphs 1 through 140 of this Indictment are re-alleged and incorporated by reference as if fully set forth herein.

142. From on or about December 23, 2019 to on or about January 17, 2020, in the Northern District of Ohio, Eastern Division, Defendant SHIRLEY LADSON did knowingly and with the intent to defraud, use one or more unauthorized access devices, as defined in Title 18, United States Code, Section 1029(e)(3), to wit: credit cards obtained with intent to defraud, and by such conduct, did obtain goods and services valued at \$1,000 or more, such use affecting interstate commerce, in violation of Title 18, United States Code, Sections 1029(a)(2).

COUNT 14

(Access Device Fraud, 18 U.S.C. § 1029(a)(2))

The Grand Jury further charges:

143. Paragraphs 1 through 142 of this Indictment are re-alleged and incorporated by reference as if fully set forth herein.

144. From on or about March 19, 2020 to on or about March 22, 2020, in the Northern District of Ohio, Eastern Division, Defendant JOSEPH BROWN did knowingly and with the intent to defraud, use one or more unauthorized access devices, as defined in Title 18, United States Code, Section 1029(e)(3), to wit: credit cards obtained with intent to defraud, and by such conduct, did obtain goods and services valued at \$1,000 or more, such use affecting interstate commerce, in violation of Title 18, United States Code, Sections 1029(a)(2).

COUNT 15

(Aggravated Identity Theft, 18 U.S.C. § 1028A(a)(1))

The Grand Jury further charges:

145. Paragraphs 1 through 144 of this Indictment are re-alleged and incorporated by reference as if fully set forth herein.

146. On or about March 23, 2018, in the Northern District of Ohio, Eastern Division, and elsewhere, Defendant DIONTAE WALLACE, during and in relation to a felony violation of Title 18, United States Code, Section 1029(b)(2), knowingly possessed and used, without lawful authority, a means of identification of another person, to wit: J.B.'s name and driver's license number, knowing that said means of identification belonged another person, in violation of Title 18, United States Code, Sections 1028A(a)(1).

COUNT 16

(Aggravated Identity Theft, 18 U.S.C. § 1028A(a)(1))

The Grand Jury further charges:

147. Paragraphs 1 through 146 of this Indictment are re-alleged and incorporated by reference as if fully set forth herein.

148. On or about January 17, 2020, in the Northern District of Ohio, Eastern Division, and elsewhere, Defendant ADRIENNE CAMPBELL, during and in relation to a felony violation of Title 18, United States Code, Section 1029(b)(2), knowingly possessed and used, without lawful authority, a means of identification of another person, to wit: M.M.'s name and date of birth, knowing that said means of identification belonged another person, in violation of Title 18, United States Code, Sections 1028A(a)(1).

COUNT 17

(Aggravated Identity Theft, 18 U.S.C. § 1028A(a)(1))

The Grand Jury further charges:

149. Paragraphs 1 through 148 of this Indictment are re-alleged and incorporated by reference as if fully set forth herein.

150. On or about February 10, 2020, in the Northern District of Ohio, Eastern Division, and elsewhere, Defendant JOVANNA BROWN, during and in relation to a felony violation of Title 18, United States Code, Section 1029(b)(2), knowingly possessed and used, without lawful authority, a means of identification of another person, to wit: K.S.'s name and Social Security Number, knowing that said means of identification belonged another person, in violation of Title 18, United States Code, Sections 1028A(a)(1).

COUNT 18

(Aggravated Identity Theft, 18 U.S.C. § 1028A(a)(1))

The Grand Jury further charges:

151. Paragraphs 1 through 150 of this Indictment are re-alleged and incorporated by reference as if fully set forth herein.

152. On or about June 26, 2017, in the Northern District of Ohio, Eastern Division, and elsewhere, Defendant MARCELLUS SMITH, during and in relation to a felony violation of Title 18, United States Code, Section 1029(b)(2), knowingly possessed and used, without lawful authority, a means of identification of another person, to wit: J.A.'s name and Social Security Number, knowing that said means of identification belonged another person, in violation of Title 18, United States Code, Sections 1028A(a)(1).

COUNT 19

(Aggravated Identity Theft, 18 U.S.C. § 1028A(a)(1))

The Grand Jury further charges:

153. Paragraphs 1 through 153 of this Indictment are re-alleged and incorporated by reference as if fully set forth herein.

154. On or about February 1, 2018, in the Northern District of Ohio, Eastern Division, and elsewhere, Defendant JAMES LUKE, during and in relation to a felony violation of Title 18, United States Code, Section 1029(b)(2), knowingly possessed and used, without lawful authority, a means of identification of another person, to wit: D.P.'s name, date of birth, and driver's license number, knowing that said means of identification belonged another person, in violation of Title 18, United States Code, Sections 1028A(a)(1).

COUNT 20

(Aggravated Identity Theft, 18 U.S.C. § 1028A(a)(1))

The Grand Jury further charges:

155. Paragraphs 1 through 154 of this Indictment are re-alleged and incorporated by reference as if fully set forth herein.

156. On or about July 28, 2017, in the Northern District of Ohio, Eastern Division, and elsewhere, Defendant GLENN KING, JR., during and in relation to a felony violation of Title 18, United States Code, Section 1029(b)(2), knowingly possessed and used, without lawful authority, a means of identification of another person, to wit: M.B.'s name and Social Security Number, knowing that said means of identification belonged another person, in violation of Title 18, United States Code, Sections 1028A(a)(1).

COUNT 21

(Aggravated Identity Theft, 18 U.S.C. § 1028A(a)(1))

The Grand Jury further charges:

157. Paragraphs 1 through 156 of this Indictment are re-alleged and incorporated by reference as if fully set forth herein.

158. On or about January 17, 2020, in the Northern District of Ohio, Eastern Division, and elsewhere, Defendant SHIRLEY LADSON, during and in relation to a felony violation of Title 18, United States Code, Section 1029(b)(2), knowingly possessed and used, without lawful authority, a means of identification of another person, to wit: M.M.'s name and date of birth, knowing that said means of identification belonged another person, in violation of Title 18, United States Code, Sections 1028A(a)(1).

COUNT 22

(Aggravated Identity Theft, 18 U.S.C. § 1028A(a)(1))

The Grand Jury further charges:

159. Paragraphs 1 through 158 of this Indictment are re-alleged and incorporated by reference as if fully set forth herein.

160. On or about March 21, 2020, in the Northern District of Ohio, Eastern Division, and elsewhere, Defendant JOSEPH BROWN, during and in relation to a felony violation of Title 18, United States Code, Section 1029(b)(2), knowingly possessed and used, without lawful authority, a means of identification of another person, to wit: D.H.'s name and date of birth, knowing that said means of identification belonged another person, in violation of Title 18, United States Code, Sections 1028A(a)(1).

FORFEITURE

The Grand Jury further charges:

161. The allegations contained in Counts 1 through 14 are hereby re-alleged and incorporated by reference as if fully set forth herein for the purpose of alleging forfeiture pursuant to the provisions of 18 U.S.C. § 982(a)(2) and 18 U.S.C. § 1029(c)(1)(C). As a result of these offenses, Defendants DIONTAE WALLACE, ADRIENNE CAMPBELL, JOVANNA BROWN, MARCELLUS SMITH, JAMES LUKE, GLENN KING, JR., SHIRLEY LADSON, and JOSEPH BROWN, shall forfeit to the United States any property which constitutes or is derived from proceeds they obtained directly or indirectly as a result of such violations; and any property used or intended to be used to commit such violations.

A TRUE BILL.

Original document - Signatures on file with the Clerk of Courts, pursuant to the E-Government Act of 2002.