

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

Case No. 20-80037-CR-MARRA/MATTHEWMAN(s)

18 U.S.C. § 1349  
18 U.S.C. § 1029(b)(2)  
18 U.S.C. § 1344  
18 U.S.C. § 1028A  
18 U.S.C. § 981  
18 U.S.C. § 982  
18 U.S.C. § 1029(c)(2)

UNITED STATES OF AMERICA

vs.

SHAUMBRICA STUBBS,  
LUCLESSE VERNESSE,  
SAMUEL CHARLES,  
IAN FELDER,  
DIERDRE DIXON,  
and  
SHAQUILLE ROBINSON,

Defendants.

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**SUPERSEDING INFORMATION**

The United States Attorney charges that:

**COUNT 1**

**Conspiracy to commit bank fraud**

1. In or around 2016, and continuing through in or around June 2019, the exact dates being unknown to the United States Attorney, in Palm Beach County, in the Southern District of Florida, and elsewhere, the defendants,

SHAUMBRICA STUBBS,  
LUCLESSE VERNESSE,  
SAMUEL CHARLES,  
IAN FELDER,  
DIERDRE DIXON,  
and  
SHAQUILLE ROBINSON,

did knowingly and willfully combine, conspire, confederate, and agree with each other and with others known and unknown to the United States Attorney, to knowingly, and with the intent to defraud, execute and cause the execution of a scheme and artifice to defraud federally insured financial institutions, and to obtain any of the moneys, funds, assets, and other property owned by and under the custody and control of said financial institutions, by means of materially false and fraudulent pretenses, representations, and promises, in violation of Title 18, United States Code, Section 1344.

**Purpose of the Conspiracy**

2. It was the purpose and object of the conspiracy for the defendants to unlawfully enrich themselves by convincing elderly victims to relinquish their bank cards by telling the victims that their accounts had been compromised, promising to replace the compromised cards with new cards, and then using the fraudulently obtained bank cards to withdraw money from the customers' accounts held at federally insured financial institutions, or to make unauthorized purchases using the cards.

**Manner and Means of the Conspiracy**

The manner and means by which the defendants and their conspirators sought to accomplish the objects and purpose of the conspiracy included, among other things, the following:

3. From in or around 2016, a female co-conspirator contacted each elderly victim, stated that she was a bank representative from the victim's bank, and that the victim's account had been compromised.

4. The female co-conspirator supplied sufficient information for each victim's account that convinced the victim that the call was legitimate, such as last transaction

information or personal identifying information. The female co-conspirator then offered to send a “bank representative” to the victim's home to retrieve the “compromised” card(s).

5. A person claiming to be a bank representative arrived at the victim's home shortly thereafter, often while the victim was still on the phone with the female co-conspirator. The “bank representative” then obtained the victim’s “compromised” debit and/or credit card(s) and promised to return with a new uncompromised card. After the “bank representative” obtained the compromised cards, that representative and another co-conspirator then used the cards as quickly as possible, withdrawing cash from automatic teller machines (“ATMs”), purchasing money orders, or otherwise conducting transactions on the accounts.

6. The defendants and their conspirators used the fraudulently obtained cards to withdraw a total of more than \$1,000,000 from more than 200 victims who held accounts at federally insured financial institutions, such as Bank of America (“BofA”), JP Morgan Chase (“Chase”), and Wells Fargo (“WF”), without the authorization of the holders of those accounts.

All in violation of Title 18, United States Code, Section 1349.

**COUNT 2**  
**Conspiracy to commit access device fraud**

1. In or around 2016, and continuing through in or around June 2019, the exact dates being unknown to the United States Attorney, in Palm Beach County, in the Southern District of Florida, and elsewhere, the defendants,

**SHAUMBRICA STUBBS,  
LUCLESSE VERNESSE,  
SAMUEL CHARLES,  
IAN FELDER,  
DIERDRE DIXON,**

**and  
SHAQUILLE ROBINSON,**

did knowingly and willfully combine, conspire, confederate, and agree with each other and with others known and unknown to the United States Attorney, to commit certain offenses against the United States, that is, to knowingly, and with intent to defraud, use one or more unauthorized access devices during any one-year period, and by such conduct did obtain anything of value aggregating \$1,000 or more during that period, said conduct affecting interstate and foreign commerce, in violation of Title 18, United States Code, Section 1029(a)(2).

**Purpose of the Conspiracy**

1. Paragraph 2 of Count 1 of this Information is realleged and incorporated by reference as though fully set forth herein to describe the purpose of the conspiracy.

**Manner And Means of the Conspiracy**

2. The Manner and Means section of Count 1 of this Superseding Information is realleged and incorporated by reference as though fully set forth herein to describe the manner and means of the conspiracy.

**Overt Acts**

In furtherance of the conspiracy, and to accomplish its objects and purpose, the conspirators committed and caused to be committed, in the Southern District of Florida and elsewhere, the following overt acts, among others:

3. On or about February 1, 2017, **LUCLESSE VERNESSE** withdrew funds from an account at a federally insured financial institution using an ATM card and PIN obtained by fraud, without the authorization of the holder of this account.

4. On or about February 1, 2017, **SHAUMBRICA STUBBS** made a purchase using a bank card obtained by fraud, without the authorization of the holder of the account.

5. On or about October 15, 2017, **LUCLESSE VERNESSE** withdrew funds from an account at federally insured financial institution using an ATM card and PIN obtained by fraud, without the authorization of the holder of this account.

6. On or about October 15, 2017, **SAMUEL CHARLES** made a purchase using a bank card obtained by fraud, without the authorization of the holder of the account.

7. On or about December 27, 2017, **IAN FELDER** withdrew funds from an account at a federally insured financial institution using an ATM card and PIN obtained by fraud, without the authorization of the holder of this account.

8. On or about December 27, 2017, **IAN FELDER** made a purchase using a bank card obtained by fraud, without the authorization of the holder of the account.

9. On or about February 19, 2018, **LUCLESSE VERNESSE** made a purchase using a bank card obtained by fraud, without the authorization of the holder of the account.

10. On or about February 19, 2018, **SAMUEL CHARLES** made a purchase using a bank card obtained by fraud, without the authorization of the holder of the account.

11. On or about March 21, 2018, **IAN FELDER** withdrew funds from an account at a federally insured financial institution using an ATM card and PIN obtained by fraud, without the authorization of the holder of this account.

12. On or about March 21, 2018, **IAN FELDER** made a purchase using a bank card obtained by fraud, without the authorization of the holder of the account.

13. On or about March 28, 2018, **IAN FELDER** withdrew funds from an account at a federally insured financial institution using an ATM card and PIN obtained by fraud, without the authorization of the holder of this account.

14. On or about April 27, 2018, **LUCLESSE VERNESSE** made a purchase using a bank card obtained by fraud, without the authorization of the holder of the account.

15. On or about June 9, 2018, **SHAUMBRICA STUBBS** withdrew funds from an account at a federally insured financial institution using an ATM card and PIN obtained by fraud, without the authorization of the holder of this account.

16. On or about October 18, 2018, **SHAQUILLE ROBINSON** withdrew funds from an account at a federally insured financial institution using an ATM card and PIN obtained by fraud, without the authorization of the holder of this account.

17. On or about October 18, 2018, **SHAQUILLE ROBINSON** made a purchase using a bank card obtained by fraud, without the authorization of the holder of the account.

18. On or about December 10, 2018, **SHAUMBRICA STUBBS** withdrew funds from an account at a federally insured financial institution using an ATM card and PIN obtained by fraud, without the authorization of the holder of this account.

19. On or about December 10, 2018, **DIERDRE DIXON** made a purchase using a bank card obtained by fraud, without the authorization of the holder of the account.

20. On or about January 29, 2019, **SHAQUILLE ROBINSON** withdrew funds from an account at a federally insured financial institution using an ATM card and PIN obtained by fraud, without the authorization of the holder of this account.

21. On or about January 29, 2019, **DIERDRE DIXON** made a purchase using a bank card obtained by fraud, without the authorization of the holder of the account.

22. On or about February 24, 2019, **SHAQUILLE ROBINSON** withdrew funds from an account at a federally insured financial institution using an ATM card and PIN obtained by fraud, without the authorization of the holder of this account.

23. On or about February 24, 2019, **DIERDRE DIXON** made a purchase using a bank card obtained by fraud, without the authorization of the holder of the account.

All in violation of Title 18, United States Code, Section 1029(b)(2).

**COUNTS 3-25**  
**Bank Fraud**

1. In or around 2016, and continuing through in or around June 2019, the exact dates being unknown to the United States Attorney, in Palm Beach County, in the Southern District of Florida, and elsewhere, the defendants,

**SHAUMBRICA STUBBS,  
LUCLESSE VERNESSE,  
SAMUEL CHARLES,  
IAN FELDER,  
DIERDRE DIXON,  
and  
SHAQUILLE ROBINSON,**

did knowingly and with intent to defraud execute and attempt to execute a scheme and artifice to defraud federally insured financial institutions and to obtain any of the money, funds, assets and other property owned by and under the custody and control of said financial institutions, by means of materially false and fraudulent pretenses, representations, and promises.

**Purpose of the Scheme and Artifice**

2. Paragraph 2 of Count 1 of this Superseding Information is realleged and incorporated by reference as though fully set forth herein to describe the purpose of the scheme and artifice.

**Manner and Means**

3. The Manner and Means section of Count 1 of this Superseding Information is realleged and incorporated by reference as though fully set forth herein to describe the manner and means of the scheme and artifice.

**Acts in Execution and Attempted Execution of the Scheme and Artifice**

4. On or about the dates indicated as to each count below, the indicated defendant did knowingly and with intent to defraud execute and attempt to execute said scheme and artifice by withdrawing and attempting to withdraw the indicated amounts from the indicated accounts, held at federally insured financial institutions, without the authorization of the holders of those accounts:

Count	Date	Defendant	Account number (last four digits)	Approximate amount
3	February 1, 2017	SHAUMBRICA STUBBS	BofA #7054	\$1076.78
4	February 1, 2017	LUCLESSE VERNESSE	BofA #7054	\$440.78
5	February 1, 2017	LUCLESSE VERNESSE	BofA #7054	\$350
6	October 15, 2017	LUCLESSE VERNESSE	Chase #1030	\$500
7	October 15, 2017	SAMUEL CHARLES	Chase #1030	\$1,533.56
8	October 15, 2017	LUCLESSE VERNESSE	Chase #5073	\$1,583.56
9	December 27, 2017	IAN FELDER	WF #9608	\$2,000
10	February 19, 2018	LUCLESSE VERNESSE	BofA #6208	\$1,502.67
11	February 19, 2018	SAMUEL CHARLES	BofA #6208	\$1,452.67
12	March 21, 2018	IAN FELDER	Chase #4510	\$1,700
13	March 21, 2018	IAN FELDER	Chase #4510	\$2,000
14	March 28, 2018	IAN FELDER	Chase #8497	\$2,640



Count	Date	Defendant	Account number (last four digits)	Approximate amount
15	April 27, 2018	<b>LUCLESSE VERNESSE</b>	WF #4122	\$1,653.56
16	June 9, 2018	<b>SHAUMBRICA STUBBS</b>	Chase #5436	\$3,000
17	October 18, 2018	<b>SHAQUILLE ROBINSON</b>	WF #3266	\$2,000
18	December 10, 2018	<b>SHAUMBRICA STUBBS</b>	BofA #0351	\$600
19	December 10, 2018	<b>DIERDRE DIXON</b>	BofA #0351	\$1502.67
20	January 29, 2019	<b>DIERDRE DIXON</b>	BofA #1018	\$1502.67
21	January 29, 2019	<b>DIERDRE DIXON</b>	BofA #1018	\$1,001.78
22	January 29, 2019	<b>SHAQUILLE ROBINSON</b>	BofA #1018	\$600
23	February 24, 2019	<b>DIERDRE DIXON</b>	BofA #1705	\$1,184.55
24	February 24, 2019	<b>SHAQUILLE ROBINSON</b>	BofA #0887	\$400
25	February 24, 2019	<b>SHAQUILLE ROBINSON</b>	BofA #0887	\$600

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

**COUNT 26**  
**Access Device Fraud**

Beginning on or about February 1, 2017 and continuing through on or about December 10, 2018, in Palm Beach County, in the Southern District of Florida, and elsewhere, the defendant,

**SHAUMBRICA STUBBS,**

did knowingly and with intent to defraud, use one or more unauthorized access devices, during a one-year period, and by such conduct did obtain anything of value aggregating \$1,000 or more during that period, said conduct affecting interstate and foreign commerce, in violation of Title 18, United States Code, Sections 1029(a)(2) and 2.

**COUNT 27**  
**Access Device Fraud**

Beginning on or about February 1, 2017 and continuing through on or about April 27, 2018, in Palm Beach County, in the Southern District of Florida, and elsewhere, the defendant,

**LUCLESSE VERNESSE,**

did knowingly and with intent to defraud, use one or more unauthorized access devices, during a one-year period, and by such conduct did obtain anything of value aggregating \$1,000 or more during that period, said conduct affecting interstate and foreign commerce, in violation of Title 18, United States Code, Sections 1029(a)(2) and 2.

**COUNT 28**  
**Access Device Fraud**

From on or about October 15, 2017 through on or about February 19, 2018, in Palm Beach County, in the Southern District of Florida, and elsewhere, the defendant,

**SAMUEL CHARLES,**

did knowingly and with intent to defraud, use one or more unauthorized access devices, during any one-year period, and by such conduct did obtain anything of value aggregating \$1,000 or more during that period, said conduct affecting interstate and foreign commerce, in violation of Title 18, United States Code, Sections 1029(a)(2) and 2.

**COUNT 29**  
**Access Device Fraud**

From on or about December 27, 2017 through on or about March 28, 2018, in Palm Beach County, in the Southern District of Florida, and elsewhere, the defendant,

**IAN FELDER,**

did knowingly and with intent to defraud, use one or more unauthorized access devices,

during any one-year period, and by such conduct did obtain anything of value aggregating \$1,000 or more during that period, said conduct affecting interstate and foreign commerce, in violation of Title 18, United States Code, Sections 1029(a)(2) and 2.

**COUNT 30**  
**Access Device Fraud**

From on or about December 10, 2018 through on or about February 24, 2019, in Palm Beach County, in the Southern District of Florida, and elsewhere, the defendant,

**DIERDRE DIXON,**

did knowingly and with intent to defraud, use one or more unauthorized access devices, during any one-year period, and by such conduct did obtain anything of value aggregating \$1,000 or more during that period, said conduct affecting interstate and foreign commerce, in violation of Title 18, United States Code, Sections 1029(a)(2) and 2.

**COUNT 31**  
**Access Device Fraud**

From on or about October 18, 2018 through on or about February 24, 2019, in Palm Beach County, in the Southern District of Florida, and elsewhere, the defendant,

**SHAQUILLE ROBINSON,**

did knowingly and with intent to defraud, use one or more unauthorized access devices, during any one-year period, and by such conduct did obtain anything of value aggregating \$1,000 or more during that period, said conduct affecting interstate and foreign commerce, in violation of Title 18, United States Code, Sections 1029(a)(2) and 2.

**COUNTS 32-54**  
**Aggravated Identity Theft**

On or about the dates indicated as to each count below, in Palm Beach County, in the Southern District of Florida, the defendants,

**SHAUMBRICA STUBBS,  
LUCLESSE VERNESSE,  
SAMUEL CHARLES,  
IAN FELDER,  
DIERDRE DIXON,  
and  
SHAQUILLE ROBINSON,**

as further indicated in each count below, during and in relation to a felony violation of Title 18, United States Code Section 1344, that is, bank fraud, and during and in relation to a felony violation of Title 18, United States Code, Section 1029(a)(2), that is, access device fraud, did knowingly possess and use, without lawful authority, a means of identification of another person, as follows:

Count	Approximate Date	Defendant	Means of Identification and Approximate Transaction Amount
32	February 1, 2017	<b>SHAUMBRICA STUBBS</b>	Use of debit card ending in 6643, in the name of E.K., at a Publix store in Broward County, to purchase money orders totaling \$1076.78.
33	February 1, 2017	<b>LUCLESSE VERNESSE</b>	Use of debit card ending in 6643, in the name of E.K., at a Winn Dixie store in Broward County, to purchase a money order totaling \$440.78.
34	February 1, 2017	<b>LUCLESSE VERNESSE</b>	Use of debit card ending in 6643, in the name of E.K., at a Winn Dixie store in Broward County, to purchase a money order totaling \$350.
35	October 15, 2017	<b>LUCLESSE VERNESSE</b>	Use of debit card ending in 5877 in the name of D.J., at a JP Morgan Chase Bank ATM in Broward County to acquire \$500 in cash.
36	October 15, 2017	<b>SAMUEL CHARLES</b>	Use of debit card ending in 3277, in the name of D.J., at a Publix store in Broward County, to purchase money orders totaling \$1,533.56.
37	October 15, 2017	<b>LUCLESSE VERNESSE</b>	Use of debit card ending in 5877, in the name of D.J., at a Publix store in Broward County, to purchase money orders totaling \$1583.56.

Count	Approximate Date	Defendant	Means of Identification and Approximate Transaction Amount
38	December 27, 2017	<b>IAN FELDER</b>	Use of debit card ending in 9026 in the name of E.B., at a Wells Fargo Bank ATM in Palm Beach County to acquire \$2,000 in cash.
39	February 19, 2018	<b>LUCLESSE VERNESSE</b>	Use of debit card ending in 3790, in the name of E.W., at a Publix store in Palm Beach County, to purchase money orders totaling \$1,583.56.
40	February 19, 2018	<b>SAMUEL CHARLES</b>	Use of debit card ending in 9719, in the name of M.W., at a Publix store in Palm Beach County, to purchase money orders totaling \$1,452.67.
41	March 21, 2018	<b>IAN FELDER</b>	Use of debit card ending in 1960 in the name of M.L., at a JP Morgan Chase Bank ATM in Palm Beach County to acquire \$1,700 in cash.
42	March 21, 2018	<b>IAN FELDER</b>	Use of debit card ending in 8365 in the name of M.L., at a Wells Fargo Bank ATM in Palm Beach County to acquire \$2,000 in cash.
43	March 28, 2018	<b>IAN FELDER</b>	Use of debit card ending in 7793 in the name of F.F., at a JP Morgan Chase Bank ATM in Palm Beach County to acquire \$2,640 in cash.
44	April 27, 2018	<b>LUCLESSE VERNESSE</b>	Use of debit card ending in 0115, in the name of R.M., at a Publix store in Palm Beach County, to purchase money orders totaling \$1,653.56.
45	June 9, 2018	<b>SHAUMBRICA STUBBS</b>	Use of debit card ending in 2739 in the name of P.P., at a JP Morgan Chase Bank ATM in Palm Beach County to acquire \$3,000 in cash.
46	October 18, 2018	<b>SHAQUILLE ROBINSON</b>	Use of debit card ending in 4042 in the name of J.G., at a Wells Fargo Bank ATM in Palm Beach County to acquire \$2,000 in cash.
47	December 10, 2018	<b>SHAUMBRICA STUBBS</b>	Use of debit card ending in 4598 in the name of B.B., at a Bank of America ATM in Palm Beach County to acquire \$600 in cash.
48	December 10, 2018	<b>DIERDRE DIXON</b>	Use of debit card ending in 4598, in the name of B.B., at a Publix store in Palm Beach County, to purchase money orders totaling \$1,502.67.

Count	Approximate Date	Defendant	Means of Identification and Approximate Transaction Amount
49	January 29, 2019	<b>DIERDRE DIXON</b>	Use of debit card ending in 3521, in the name of R.S., at a Publix store in Palm Beach County, to purchase money orders totaling \$1,502.67.
50	January 29, 2019	<b>DIERDRE DIXON</b>	Use of debit card ending in 3521, in the name of R.S., at a Publix store in Palm Beach County, to purchase money orders totaling \$1,001.78.
51	January 29, 2019	<b>SHAQUILLE ROBINSON</b>	Use of debit card ending in 3521 in the name of R.S., at a Bank of America ATM in Palm Beach County to acquire \$600 in cash.
52	February 24, 2019	<b>DIERDRE DIXON</b>	Use of a credit card ending in 1040 in the name of D.R. at a Best Buy in Palm Beach County to purchase \$1,184.55 worth of goods.
53	February 24, 2019	<b>SHAQUILLE ROBINSON</b>	Use of debit card ending in 3324 in the name of D.R., at a Bank of America ATM in Palm Beach County to acquire \$400 in cash.
54	February 24, 2019	<b>SHAQUILLE ROBINSON</b>	Use of debit card ending in 3324 in the name of D.R., at a Bank of America ATM in Palm Beach County to acquire \$600 in cash.

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

#### FORFEITURE ALLEGATIONS

1. The allegations of this Superseding Information are hereby re-alleged and by this reference fully incorporated herein for the purpose of alleging forfeiture to the United States of America of certain property in which the defendants, **SHAUMBRICA STUBBS, LUCLESSE VERNESSE, SAMUEL CHARLES, IAN FELDER, DIERDRE DIXON, and SHAQUILLE ROBINSON** have an interest.

2. Upon conviction of a violation of Title 18, United States Code, Section 1344 or a conspiracy to commit such violation, as alleged in this Superseding Information, the defendants shall forfeit to the United States any right, title and interest to the United States

in any property constituting, or derived from, proceeds obtained directly or indirectly as the result of such offense, pursuant to Title 18, United States Code, Section 982(a)(2)(A).

3. Upon conviction of a violation of Title 18, United States Code, Section 1029, as alleged in this Superseding Information, the defendants shall forfeit to the United States (a) any property constituting, or derived from, proceeds obtained, directly or indirectly, as the result of such offense, pursuant to Title 18, United States Code, Section 982(a)(2)(B); and (b) any personal property used, or intended to be used, to commit such offense, pursuant to Title 18, United States Code, Section 1029(c)(1)(C).

All pursuant to Title 18, United States Code, Sections 982(a)(2)(A), and 1029(c)(1)(C) and the procedures set forth at Title 21, United States Code, Section 853, as made applicable by Title 18, United States Code, Sections 982(b)(1) and 1029(c)(2).

  
ARIANA FAJARDO ORSHAN  
UNITED STATES ATTORNEY

  
SUSAN OSBORNE  
ASSISTANT UNITED STATES ATTORNEY

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

UNITED STATES OF AMERICA

CASE NO. 20-CR-80037-KAM(s)

v.  
SHAUMBRICA STUBBS, LUCLESSE  
VERNESSE, SAMUEL CHARLES, IAN  
FELDER, DIERDRE DIXON, and SHAQUILLE ROBINSON

**CERTIFICATE OF TRIAL ATTORNEY\***

**Superseding Case Information:**

Defendant. /

**Court Division:** (Select One)

Miami  Key West  
 FTL  WPB  FTP

New Defendant(s) Number Yes  No   
of New Defendants Total 4  
number of counts 54

I do hereby certify that:

- I have carefully considered the allegations of the indictment, the number of defendants, the number of probable witnesses and the legal complexities of the Indictment/Information attached hereto.
- I am aware that the information supplied on this statement will be relied upon by the Judges of this Court in setting their calendars and scheduling criminal trials under the mandate of the Speedy Trial Act, Title 28 U.S.C. Section 3161.
- Interpreter: (Yes or No) No  
List language and/or dialect \_\_\_\_\_
- This case will take 20 days for the parties to try.
- Please check appropriate category and type of offense listed below:

(Check only one)

(Check only one)

I 0 to 5 days  
II 6 to 10 days  
III 11 to 20 days  
IV 21 to 60 days  
V 61 days and over

Petty  
Minor  
Misdem.  
Felony

6. Has this case been previously filed in this District Court? (Yes or No) No  
If yes:

Judge: (Attach copy of dispositive order) Case No. \_\_\_\_\_

Has a complaint been filed in this matter? (Yes or No) No

If yes: Magistrate Case No. 20-MJ-08116-WM, 20-MJ-08070-BER, 20-MJ-08086-DLB

Related Miscellaneous numbers: \_\_\_\_\_

Defendant(s) in federal custody as of 3/17/20, 3/17/20, 3/17/20, 2/18/20, 2/26/20, 2/26/20

Defendant(s) in state custody as of Rule  
20 from the District of \_\_\_\_\_

Is this a potential death penalty case? (Yes or No) No

7. Does this case originate from a matter pending in the Central Region of the U.S. Attorney's Office prior to August 9, 2013 (Mag. Judge Alicia O. Valle)? Yes  No

8. Does this case originate from a matter pending in the Northern Region US Attorneys Office prior to August 8, 2014 (Mag. Judge Shaniek Maynard)? Yes  No

*Susan R. Osborne*  
for SUSAN R. OSBORNE  
ASSISTANT UNITED STATES ATTORNEY  
Court ID No. A5500797

\*Penalty Sheet(s) attached



UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

**Defendant's Name:** DIERDRE DIXON  
**Case No:** 20-80037-CR-MARRA/MATTHEWMAN(s)

Count #: 1

Conspiracy to Commit Bank Fraud

Title 18, United States Code, Section 1349

\* **Max.Penalty:** up to 30 years of imprisonment; up to 5 years of supervised release; up to a \$1,000,000 fine or twice the gross gain or loss, and a mandatory \$100 special assessment

Count #: 2

Conspiracy to Commit Access Device Fraud

Title 18, United States Code, Section 1029(b)(2)

\* **Max.Penalty:** up to 5 years of imprisonment; up to 3 years of supervised release; up to a \$250,000 fine or twice the gross gain or loss, and a mandatory \$100 special assessment

Counts #: 19, 20, 21, 23

Bank Fraud

Title 18, United States Code, Section 1344

\* **Max.Penalty:** up to 30 years of imprisonment; up to 5 years of supervised release; up to a \$1,000,000 fine or twice the gross gain or loss, and a mandatory \$100 special assessment

Count 30

Access Device Fraud

Title 18, United States Code, Section 1029(a)(2)

\* **Max.Penalty:** up to 10 years of imprisonment; up to 3 years of supervised release; up to a \$250,000 fine or twice the gross gain or loss, and a mandatory \$100 special assessment

Counts #: 48, 49, 50, 52

Aggravated Identity Theft

Title 18, United States Code, Section 1028A

**\* Max.Penalty:** a mandatory 2 year sentence, to be served consecutively to any other count of conviction, up to 1 year of supervised release; a \$250,000 fine or twice the gross gain or loss, and a mandatory \$100 special assessment

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

**Defendant's Name:** SAMUEL CHARLES  
**Case No:** 20-80037-CR-MARRA/MATTHEWMAN(s)

Count #: 1

Conspiracy to Commit Bank Fraud

Title 18, United States Code, Section 1349

\* **Max.Penalty:** up to 30 years of imprisonment; up to 5 years of supervised release; up to a \$1,000,000 fine or twice the gross gain or loss, and a mandatory \$100 special assessment

Count #: 2

Conspiracy to Commit Access Device Fraud

Title 18, United States Code, Section 1029(b)(2)

\* **Max.Penalty:** up to 5 years of imprisonment; up to 3 years of supervised release; up to a \$250,000 fine or twice the gross gain or loss, and a mandatory \$100 special assessment

Counts #: 7, 11

Bank Fraud

Title 18, United States Code, Section 1344

\* **Max.Penalty:** up to 30 years of imprisonment; up to 5 years of supervised release; up to a \$1,000,000 fine or twice the gross gain or loss, and a mandatory \$100 special assessment

Count 28

Access Device Fraud

Title 18, United States Code, Section 1029(a)(2)

\* **Max.Penalty:** up to 10 years of imprisonment; up to 3 years of supervised release; up to a \$250,000 fine or twice the gross gain or loss, and a mandatory \$100 special assessment

Counts #: 36, 40

Aggravated Identity Theft

Title 18, United States Code, Section 1028A

**\* Max.Penalty:** a mandatory 2 year sentence, to be served consecutively to any other count of conviction, up to 1 year of supervised release; a \$250,000 fine or twice the gross gain or loss, and a mandatory \$100 special assessment

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

**Defendant's Name:** LUCLESSE VERNESSE  
**Case No:** 20-80037-CR-MARRA/MATTHEWMAN(s)

Count #: 1

Conspiracy to Commit Bank Fraud

Title 18, United States Code, Section 1349

\* **Max.Penalty:** up to 30 years of imprisonment; up to 5 years of supervised release; up to a \$1,000,000 fine or twice the gross gain or loss, and a mandatory \$100 special assessment

Count #: 2

Conspiracy to Commit Access Device Fraud

Title 18, United States Code, Section 1029(b)(2)

\* **Max.Penalty:** up to 5 years of imprisonment; up to 3 years of supervised release; up to a \$250,000 fine or twice the gross gain or loss, and a mandatory \$100 special assessment

Counts #: 4, 5, 6, 8, 10, 15

Bank Fraud

Title 18, United States Code, Section 1344

\* **Max.Penalty:** up to 30 years of imprisonment; up to 5 years of supervised release; up to a \$1,000,000 fine or twice the gross gain or loss, and a mandatory \$100 special assessment

Count 27

Access Device Fraud

Title 18, United States Code, Section 1029(a)(2)

\* **Max.Penalty:** up to 10 years of imprisonment; up to 3 years of supervised release; up to a \$250,000 fine or twice the gross gain or loss, and a mandatory \$100 special assessment

Counts #: 33, 34, 35, 37, 39, 44

Aggravated Identity Theft

Title 18, United States Code, Section 1028A

**\* Max. Penalty:** a mandatory 2 year sentence, to be served consecutively to any other count of conviction, up to 1 year of supervised release; a \$250,000 fine or twice the gross gain or loss, and a mandatory \$100 special assessment

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

**Defendant's Name:** SHAUMBRICA STUBBS  
**Case No:** 20-80037-CR-MARRA/MATTHEWMAN(s)

Count #: 1

Conspiracy to Commit Bank Fraud

Title 18, United States Code, Section 1349

\* **Max.Penalty:** up to 30 years of imprisonment; up to 5 years of supervised release; up to a \$1,000,000 fine or twice the gross gain or loss, and a mandatory \$100 special assessment

Count #: 2

Conspiracy to Commit Access Device Fraud

Title 18, United States Code, Section 1029(b)(2)

\* **Max.Penalty:** up to 5 years of imprisonment; up to 3 years of supervised release; up to a \$250,000 fine or twice the gross gain or loss, and a mandatory \$100 special assessment

Counts #: 3, 16, 18

Bank Fraud

Title 18, United States Code, Section 1344

\* **Max.Penalty:** up to 30 years of imprisonment; up to 5 years of supervised release; up to a \$1,000,000 fine or twice the gross gain or loss, and a mandatory \$100 special assessment

Count 26

Access Device Fraud

Title 18, United States Code, Section 1029(a)(2)

\* **Max.Penalty:** up to 10 years of imprisonment; up to 3 years of supervised release; up to a \$250,000 fine or twice the gross gain or loss, and a mandatory \$100 special assessment

Counts #: 32, 45, 47

Aggravated Identity Theft

Title 18, United States Code, Section 1028A

**\* Max.Penalty:** a mandatory 2 year sentence, to be served consecutively to any other count of conviction, up to 1 year of supervised release; a \$250,000 fine or twice the gross gain or loss, and a mandatory \$100 special assessment



UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

**Defendant's Name:** IAN FELDER

**Case No:** 20-80037-CR-MARRA/MATTHEWMAN(s)

Count #: 1

Conspiracy to Commit Bank Fraud

Title 18, United States Code, Section 1349

\* **Max.Penalty:** up to 30 years of imprisonment; up to 5 years of supervised release; up to a \$1,000,000 fine or twice the gross gain or loss, and a mandatory \$100 special assessment

Count #: 2

Conspiracy to Commit Access Device Fraud

Title 18, United States Code, Section 1029(b)(2)

\* **Max.Penalty:** up to 5 years of imprisonment; up to 3 years of supervised release; up to a \$250,000 fine or twice the gross gain or loss, and a mandatory \$100 special assessment

Counts #: 9, 12, 13, 14

Bank Fraud

Title 18, United States Code, Section 1344

\* **Max.Penalty:** up to 30 years of imprisonment; up to 5 years of supervised release; up to a \$1,000,000 fine or twice the gross gain or loss, and a mandatory \$100 special assessment

Count 29

Access Device Fraud

Title 18, United States Code, Section 1029(a)(2)

\* **Max.Penalty:** up to 10 years of imprisonment; up to 3 years of supervised release; up to a \$250,000 fine or twice the gross gain or loss, and a mandatory \$100 special assessment

Counts #: 38, 41, 42, 43

Aggravated Identity Theft

Title 18, United States Code, Section 1028A

**\* Max.Penalty:** a mandatory 2 year sentence, to be served consecutively to any other count of conviction, up to 1 year of supervised release; a \$250,000 fine or twice the gross gain or loss, and a mandatory \$100 special assessment

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

**Defendant's Name:** SHAQUILLE ROBINSON  
**Case No:** 20-80037-CR-MARRA/MATTHEWMAN(s)

Count #: 1

Conspiracy to Commit Bank Fraud

Title 18, United States Code, Section 1349

\* **Max.Penalty:** up to 30 years of imprisonment; up to 5 years of supervised release; up to a \$1,000,000 fine or twice the gross gain or loss, and a mandatory \$100 special assessment

Count #: 2

Conspiracy to Commit Access Device Fraud

Title 18, United States Code, Section 1029(b)(2)

\* **Max.Penalty:** up to 5 years of imprisonment; up to 3 years of supervised release; up to a \$250,000 fine or twice the gross gain or loss, and a mandatory \$100 special assessment

Counts #: 17, 22, 24, 25

Bank Fraud

Title 18, United States Code, Section 1344

\* **Max.Penalty:** up to 30 years of imprisonment; up to 5 years of supervised release; up to a \$1,000,000 fine or twice the gross gain or loss, and a mandatory \$100 special assessment

Count 31

Access Device Fraud

Title 18, United States Code, Section 1029(a)(2)

\* **Max.Penalty:** up to 10 years of imprisonment; up to 3 years of supervised release; up to a \$250,000 fine or twice the gross gain or loss, and a mandatory \$100 special assessment

Counts #: 46, 51, 53, 54

Aggravated Identity Theft

Title 18, United States Code, Section 1028A

**\* Max.Penalty:** a mandatory 2 year sentence, to be served consecutively to any other count of conviction, up to 1 year of supervised release; a \$250,000 fine or twice the gross gain or loss, and a mandatory \$100 special assessment

AO 455 (Rev. 01/09) Waiver of an Indictment

UNITED STATES DISTRICT COURT

for the  
Southern District of Florida

United States of America

v.

DIERDRE DIXON,

*Defendant*

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)  
)  
)

Case No. 20-80037-Marra/Matthewman(s)

**WAIVER OF AN INDICTMENT**

I understand that I have been accused of one or more offenses punishable by imprisonment for more than one year. I was advised in open court of my rights and the nature of the proposed charges against me.

After receiving this advice, I waive my right to prosecution by indictment and consent to prosecution by information.

Date: \_\_\_\_\_

\_\_\_\_\_  
*Defendant's signature*

\_\_\_\_\_  
*Signature of defendant's attorney*

Kristy Militello

\_\_\_\_\_  
*Printed name of defendant's attorney*

\_\_\_\_\_  
*Judge's signature*

Bruce Reinhart, United States Magistrate Judge

\_\_\_\_\_  
*Judge's printed name and title*

AO 455 (Rev. 01/09) Waiver of an Indictment

UNITED STATES DISTRICT COURT

for the

Southern District of Florida

United States of America

v.

SAMUEL CHARLES,

*Defendant*

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)  
)  
)

Case No. 20-80037-Marra/Matthewman(s)

WAIVER OF AN INDICTMENT

I understand that I have been accused of one or more offenses punishable by imprisonment for more than one year. I was advised in open court of my rights and the nature of the proposed charges against me.

After receiving this advice, I waive my right to prosecution by indictment and consent to prosecution by information.

Date: \_\_\_\_\_

\_\_\_\_\_  
*Defendant's signature*

\_\_\_\_\_  
*Signature of defendant's attorney*

Zeljka Bozanic  
\_\_\_\_\_  
*Printed name of defendant's attorney*

\_\_\_\_\_  
*Judge's signature*

Bruce Reinhart, United States Magistrate Judge  
\_\_\_\_\_  
*Judge's printed name and title*

AO 455 (Rev. 01/09) Waiver of an Indictment

UNITED STATES DISTRICT COURT  
for the  
Southern District of Florida

United States of America

v.

IAN FELDER,

*Defendant*

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)

Case No. 20-80037-Marra/Matthewman(s)

**WAIVER OF AN INDICTMENT**

I understand that I have been accused of one or more offenses punishable by imprisonment for more than one year. I was advised in open court of my rights and the nature of the proposed charges against me.

After receiving this advice, I waive my right to prosecution by indictment and consent to prosecution by information.

Date: \_\_\_\_\_

\_\_\_\_\_  
*Defendant's signature*

\_\_\_\_\_  
*Signature of defendant's attorney*

**Peter Patanzo**

\_\_\_\_\_  
*Printed name of defendant's attorney*

\_\_\_\_\_  
*Judge's signature*

**Bruce Reinhart, United States Magistrate Judge**

\_\_\_\_\_  
*Judge's printed name and title*

AO 455 (Rev. 01/09) Waiver of an Indictment

UNITED STATES DISTRICT COURT  
for the  
Southern District of Florida

United States of America )  
v. ) Case No. 20-80037-Marra/Matthewman(s)  
SHAQUILLE ROBINSON, )  
\_\_\_\_\_)  
*Defendant*

**WAIVER OF AN INDICTMENT**

I understand that I have been accused of one or more offenses punishable by imprisonment for more than one year. I was advised in open court of my rights and the nature of the proposed charges against me.

After receiving this advice, I waive my right to prosecution by indictment and consent to prosecution by information.

Date: \_\_\_\_\_

\_\_\_\_\_  
*Defendant's signature*

\_\_\_\_\_  
*Signature of defendant's attorney*

Donnie Murrell  
\_\_\_\_\_  
*Printed name of defendant's attorney*

\_\_\_\_\_  
*Judge's signature*

Bruce Reinhart, United States Magistrate Judge  
\_\_\_\_\_  
*Judge's printed name and title*