

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

MICHAEL EDWARDS,
a/k/a "Only1Giela,"
SHAKEEMO HILL,
a/k/a "Keemo,"
a/k/a "LBA Menace,"
a/k/a "Lex,"
WILLIAM HILL,
a/k/a "Eway,"
a/k/a "Skinny,"
ALIXANDRIA LAUTURE,
a/k/a "A\$,"
SHURON MALONE,
a/k/a "First Name Last Name," and
CARLOS MERCADO,
a/k/a "Kiz,"
a/k/a "Kizzle,"

Defendants.

SUPERSEDING
INDICTMENT

S2 23 Cr. 578 (JGK)

COUNT ONE
(Conspiracy to Commit Bank Fraud)

The Grand Jury charges:

Overview

1. From at least in or about January 2022 through at least in or about July 2024, in the Southern District of New York and elsewhere, MICHAEL EDWARDS, a/k/a "Only1Giela," SHAKEEMO HILL, a/k/a "Keemo," a/k/a "LBA Menace," a/k/a "Lex," WILLIAM HILL, a/k/a "Eway," a/k/a "Skinny," ALIXANDRIA LAUTURE, a/k/a "A\$," SHURON MALONE, a/k/a "First Name Last Name," and CARLOS MERCADO, a/k/a "Kiz," a/k/a "Kizzle," the defendants, together with others known and unknown, participated in an organization (the "Organization") that

perpetrated a widespread scheme to obtain U.S. Postal Service (“USPS”) keys to which they were not entitled, to steal checks from USPS collection boxes, to steal or otherwise obtain account information for bank accounts that did not belong to them, to sell stolen checks, and to alter stolen checks before depositing them in bank accounts at national banks along the East Coast of the United States, including in Connecticut, Florida, Pennsylvania, and South Carolina. In furtherance of the Organization’s criminal objectives, the members of the Organization stole or unlawfully obtained hundreds of checks worth tens of millions of dollars, millions of dollars of which were deposited into bank accounts controlled by the members of the Organization.

Background

2. The USPS delivers mail to approximately 166 million delivery points in the United States and its territories, and in 2023, delivered approximately 116.2 billion pieces of mail. The USPS maintains collection boxes, which are blue, lockable mail receptacles into which individuals may deposit outgoing mail to be sent via the USPS, and from which USPS carriers pick up such mail.

3. USPS mail carriers are assigned arrow lock keys—sometimes referred to as “postal keys” or “arrow keys”—which are distinctively shaped master keys that open mail receptacles on particular delivery or collection routes in particular zip codes. Arrow lock keys are the property of the USPS and kept under strict control by the USPS to prevent them from falling into the hands of unauthorized persons. Among other things, arrow lock keys are kept secured at USPS facilities; USPS mail carriers must sign arrow lock keys out before they begin mail delivery, secure the keys to their uniforms with a chain while on duty, and return the keys at the end of the day; and USPS supervisors must document the issuance and collection of arrow lock keys each day. USPS employees must also report any missing, lost, or stolen arrow lock keys immediately, and the

ordering of new keys is restricted to certain authorized supervisory personnel.

The Organization

4. MICHAEL EDWARDS, a/k/a “Only1Giela,” the defendant, was a leader of the Organization. EDWARDS coordinated and conspired with other members of the Organization to achieve its goals. The members of the Organization engaged in various aspects of the scheme, which generally included unlawfully obtaining postal keys, stealing checks from USPS collection boxes, obtaining account information for bank accounts into which they deposited stolen checks, physically or electronically altering stolen checks, and selling checks on Telegram, a third-party instant messaging application that allows its users to broadcast messages to any Telegram user who subscribes to the channel.

5. The postal keys obtained by the members of the Organization included postal keys that unlocked collection boxes located on the Upper East Side in Manhattan, among other places. For example, MICHAEL EDWARDS, a/k/a “Only1Giela,” the defendant, and another co-conspirator (“CC-1”) discussed the purchase of postal keys in or about May 2023, which included negotiations about the price at which CC-1 was willing to sell certain postal keys to EDWARDS depending on the number of postal keys that EDWARDS purchased and the zip codes with which the postal keys were associated, among other things. In substance and in part, EDWARDS also discussed purchasing postal keys from CC-1 with other members of the Organization, including WILLIAM HILL, a/k/a “Eway,” a/k/a “Skinny,” the defendant, among others, including having discussions about the number of postal keys to obtain, the neighborhoods where those postal keys could be used, and the price that the members of the Organization were willing to pay, before ultimately purchasing the postal keys, including a postal key that was used by EDWARDS and CARLOS MERCADO, a/k/a “Kiz,” a/k/a “Kizzle,” the defendant, to steal mail from a collection

box located on the Upper East Side on or about July 10, 2023. At no point were EDWARDS, WILLIAM HILL, MERCADO, or any other member of the Organization employed by the USPS or entitled to lawfully possess or use any postal key.

6. After unlawfully obtaining postal keys, the members of the Organization used them to “fish” for mail. MICHAEL EDWARDS, a/k/a “Only1Giela,” the defendant, and other members of the Organization, including SHAKEEMO HILL, a/k/a “Keemo,” a/k/a “LBA Menace,” a/k/a “Lex,” and WILLIAM HILL, a/k/a “Eway,” a/k/a “Skinny,” the defendants, among others, discussed, in substance and in part, the logistics of traveling to locations in New York City and Connecticut to go “fishing”—that is, to steal mail from USPS collection boxes using postal keys. The members of the Organization paid co-conspirators, including CARLOS MERCADO, a/k/a “Kiz,” a/k/a “Kizzle,” the defendant, among others, to drive them to “fish” for mail and coordinated what supplies to bring, the dates that the members of the Organization planned to steal mail, and the cities they planned to target. In the process of, and after, stealing mail from collection boxes, members of the Organization also kept each other apprised of the results of their fishing, sending each other photographs of bags of undelivered mail as well as mail that they opened to reveal checks, cash, and bank cards.

7. As part of the Organization, MICHAEL EDWARDS, a/k/a “Only1Giela,” SHAKEEMO HILL, a/k/a “Keemo,” a/k/a “LBA Menace,” a/k/a “Lex,” WILLIAM HILL, a/k/a “Eway,” a/k/a “Skinny,” ALIXANDRIA LAUTURE, a/k/a “A\$,” and SHURON MALONE, a/k/a “First Name Last Name,” the defendants, among others, also obtained and exchanged account information, including account log-in information, for bank accounts held in the names of third parties, not members of the Organization. The members of the Organization generally obtained this bank account information by persuading the third-party accountholders to permit the

Organization to use the otherwise legitimate bank accounts—referred to herein as “dirty bank accounts”—to deposit stolen money and stolen checks, often in exchange for some monetary compensation. In some circumstances, the members of the Organization attempted to recruit individuals that they knew, including family members, friends, or acquaintances. Other times, members of the Organization publicly posted pictures of checks or cash on their social media accounts, along with captions inviting those with bank accounts at specific financial institutions to reach out. Ultimately, the members of the Organization obtained, exchanged, and used multiple dirty bank accounts to avoid using their own bank accounts and to decrease the likelihood that a bank would identify multiple deposits into the same account as fraudulent.

8. Because the undelivered checks stolen by the Organization had payee names that did not match the names associated with the dirty bank accounts, members of the Organization provided the names and account numbers to other members of the Organization, including MICHAEL EDWARDS, a/k/a “Only1Giela,” and SHAKEEMO HILL, a/k/a “Keemo,” a/k/a “LBA Menace,” a/k/a “Lex,” the defendants, who then altered the payee information on the checks to match the names associated with the dirty accounts into which the stolen checks would be deposited. Sometimes, the stolen checks were physically altered, or “washed,” by creating a liquid solution and submerging the stolen check into the solution,¹ causing the ink to evaporate from the surface of the check and enabling members of the Organization to alter information, including the payee information and the check amount. Other times, the stolen checks were digitally altered, or “cooked,” by scanning the check, using commercially available computer software to revise the

¹ Check washers can submerge portions of the check and thereby select the portion or portions of the check from which they wish to remove ink.

payee information or the check amount on the digital copy of the check,² and printing the altered, fraudulent check on specific types of commercially available paper, such as check stock.

9. Various members of the Organization also participated in depositing the fraudulently altered checks into the dirty bank accounts, including MICHAEL EDWARDS, a/k/a “Only1Giela,” SHAKEEMO HILL, a/k/a “Keemo,” a/k/a “LBA Menace,” a/k/a “Lex,” ALIXANDRIA LAUTURE, a/k/a “A\$,” and SHURON MALONE, a/k/a “First Name Last Name,” the defendants, among others. Sometimes, members of the Organization “walked” the fraudulent checks after receiving the payee and dirty bank account information—that is, they physically took the fraudulent check to a bank branch to deposit at the teller window or an ATM. Other times, members of the Organization recruited third parties who would be willing to “walk” the fraudulent checks, with members of the Organization sometimes instructing the third parties as to how they should dress when going to the bank branch to make the deposit. In addition to depositing the fraudulent checks physically, or causing them to be deposited physically, members of the Organization also used the dirty bank account information that they obtained, including online account log-in and access information, to deposit the checks via mobile deposit.³ Regardless of whether the fraudulent checks were deposited physically or electronically, members of the Organization coordinated regarding which accounts to use, discussing the age of certain accounts, how recently those accounts had been used, and the current balance of those accounts. After depositing the fraudulent checks, members of the Organization also kept each other abreast of how much money they had deposited, sending each other photographs of deposit slips or mobile

² Because business checks, for example, are often typed and not written, individuals engaged in check theft often “cook” the check to digitally erasing certain information from the check, rather than washing the check, which would risk damaging the entirety of the check.

³ Many major financial institutions maintain mobile applications through which their users may deposit checks using their mobile devices.

deposit confirmations. After the fraudulent checks were deposited into dirty bank accounts, members of the Organization, including EDWARDS, SHAKEEMO HILL, WILLIAM HILL, and MALONE, among others, then withdrew substantial amounts of the deposited funds for their personal use.

10. Members of the Organization used Telegram extensively to communicate and coordinate the operations of the Organization. Members of the Organization, including MICHAEL EDWARDS, a/k/a “Only1Giela,” the defendant, also posted checks on Telegram for sale. For example, EDWARDS operated Telegram channels, through which he posted in excess of approximately \$42 million in checks that were not in the names of any members of the Organization between at least November 2023 and July 2024.

STATUTORY ALLEGATIONS

11. From at least in or about January 2022 through at least in or about October 2023, in the Southern District of New York and elsewhere, MICHAEL EDWARDS, a/k/a “Only1Giela,” while released under Chapter 207 of Title 18 of the United States Code, SHAKEEMO HILL, a/k/a “Keemo,” a/k/a “LBA Menace,” a/k/a “Lex,” WILLIAM HILL, a/k/a “Eway,” a/k/a “Skinny,” ALIXANDRIA LAUTURE, a/k/a “A\$,” and SHURON MALONE, a/k/a “First Name Last Name,” the defendants, and others known and unknown, willfully and knowingly combined, conspired, confederated, and agreed together and with each other to commit bank fraud, in violation of Title 18, United States Code, Section 1344.

12. It was a part and an object of the conspiracy that MICHAEL EDWARDS, a/k/a “Only1Giela,” SHAKEEMO HILL, a/k/a “Keemo,” a/k/a “LBA Menace,” a/k/a “Lex,” WILLIAM HILL, a/k/a “Eway,” a/k/a “Skinny,” ALIXANDRIA LAUTURE, a/k/a “A\$,” and SHURON MALONE, a/k/a “First Name Last Name,” the defendants, and others known and

unknown, knowingly would and did execute, and attempt to execute, a scheme and artifice to defraud a financial institution, as that term is defined in Title 18, United States Code, Section 20, and to obtain moneys, funds, credits, assets, securities, and other property owned by, and under the custody and control of, such a financial institution, by means of false and fraudulent pretenses, representations, and promises, in violation of Title 18, United States Code, Section 1344, to wit, EDWARDS, SHAKEEMO HILL, WILLIAM HILL, LAUTURE, and MALONE, agreed to make and cause to be made false statements to multiple financial institutions in order to obtain funds to which they was not entitled, including by fraudulently depositing stolen and manipulated checks into accounts at those financial institutions, and then using and withdrawing funds from those accounts.

(Title 18, United States Code, Sections 1349 and 3147(1).)

COUNT TWO
(Conspiracy to Commit Theft of a Postal Key)

The Grand Jury further charges:

13. The allegations contained in paragraphs one through ten of this Superseding Indictment are repeated, realleged, and incorporated by reference as if fully set forth herein.

14. From at least in or about January 2022 through at least in or about July 2023, in the Southern District of New York and elsewhere, MICHAEL EDWARDS, a/k/a “Only1Giela,” WILLIAM HILL, a/k/a “Eway,” a/k/a “Skinny,” and CARLOS MERCADO, a/k/a “Kiz,” a/k/a “Kizzle,” the defendants, and others known and unknown, willfully and knowingly combined, conspired, confederated, and agreed together and with each other to commit an offense against the United States, to wit, theft of a postal key, in violation of Title 18, United States Code, Section 1704.

15. It was a part and an object of the conspiracy that MICHAEL EDWARDS, a/k/a

“Only1Giela,” WILLIAM HILL, a/k/a “Eway,” a/k/a “Skinny,” and CARLOS MERCADO, a/k/a “Kiz,” a/k/a “Kizzle,” the defendants, and others known and unknown, would and did knowingly steal, purloin, embezzle, and obtain by false pretense a key suited to a lock adopted by the Post Office Department and the Postal Service and in use on the mails and bags thereof, and a key to a lock box, lock drawer, and other authorized receptacle for the deposit and delivery of mail matter, and would and did knowingly and unlawfully make, forge, and counterfeit such a key, and possess such mail lock and key with the intent unlawfully and improperly to use, sell, and otherwise dispose of the same, and to cause the same to be unlawfully and improperly used, sold, and otherwise disposed of, in violation of Title 18, United States Code, Section 1704.

Overt Acts

16. In furtherance of the conspiracy and to effect the illegal object thereof, the following overt acts, among others, were committed in the Southern District of New York and elsewhere:

a. On or about May 9, 2023, MICHAEL EDWARDS, a/k/a “Only1Giela,” and WILLIAM HILL, a/k/a “Eway,” the defendants, communicated on Telegram about buying postal keys from CC-1.

b. At least on or about May 10, 2023, another co-conspirator (“CC-2”) communicated with EDWARDS on Telegram about buying stolen postal keys. EDWARDS informed CC-2, in substance and in part, that three stolen postal keys were available for purchase, and that EDWARDS, WILLIAM HILL, and CC-2 could contribute “1500 each.” EDWARDS asked if CC-2 would pay in cash or via mobile payment service. CC-2 responded: “Pick it up”—that is, that EDWARDS should obtain the postal key because CC-2 would pay.

c. On or about July 10, 2023, EDWARDS and CARLOS MERCADO, a/k/a “Kiz,” a/k/a “Kizzle,” the defendant, possessed a stolen mailbox key in New York, New York.

(Title 18, United States Code, Section 371.)

COUNT THREE
**(Conspiracy to Commit Theft of Mail and Receipt of Stolen Mail,
and Sale and Receipt of Stolen Money)**

The Grand Jury further charges:

17. The allegations contained in paragraphs one through ten of this Superseding Indictment are repeated, realleged, and incorporated by reference as if fully set forth herein.

18. From at least in or about January 2022 through at least in or about July 2024, in the Southern District of New York and elsewhere, MICHAEL EDWARDS, a/k/a “Only1Giela,” while released under Chapter 207 of Title 18 of the United States Code, SHAKEEMO HILL, a/k/a “Keemo,” a/k/a “LBA Menace,” a/k/a “Lex,” WILLIAM HILL, a/k/a “Eway,” a/k/a “Skinny,” and CARLOS MERCADO, a/k/a “Kiz,” a/k/a “Kizzle,” the defendants, and others known and unknown, willfully and knowingly combined, conspired, confederated, and agreed together and with each other to commit offenses against the United States, to wit, theft of mail and receipt of stolen mail, in violation of Title 18, United States Code, Section 1708, and sale and receipt of stolen money, in violation of Title 18, United States Code, Section 2315.

19. It was a part and an object of the conspiracy that MICHAEL EDWARDS, a/k/a “Only1Giela,” SHAKEEMO HILL, a/k/a “Keemo,” a/k/a “LBA Menace,” a/k/a “Lex,” WILLIAM HILL, a/k/a “Eway,” a/k/a “Skinny,” and CARLOS MERCADO, a/k/a “Kiz,” a/k/a “Kizzle,” the defendants, and others known and unknown, would and did knowingly steal, take, and abstract, and by fraud and deception obtain, and attempt so to obtain, from and out of the mail, a post office, and a station thereof, a letter box, a mail receptacle, and a mail route and other

authorized depository for mail matter, and from a letter and mail carrier, a letter, postal card, package, bag, and mail, and would and did abstract and remove from such letter, package, bag, and mail, an article and thing contained therein, and would and did secrete, embezzle, and destroy such letter, postal card, package, bag, and mail, and an article and thing contained therein, and would and did steal, take, and abstract, and by fraud and deception obtain a letter, postal card, package, bag, and mail, and an article and thing contained therein which had been left for collection upon and adjacent to a collection box and other authorized depository of mail matter, and would and did buy, receive, and conceal, and unlawfully have in their possession, a letter, postal card, package, bag, and mail, and an article and thing contained therein, which had been so stolen, taken, embezzled, and abstracted, knowing the same to have been stolen, taken, embezzled, and abstracted, in violation of Title 18, United States Code, Section 1708.

20. It was further a part and an object of the conspiracy that MICHAEL EDWARDS, a/k/a "Only1Giela," SHAKEEMO HILL, a/k/a "Keemo," a/k/a "LBA Menace," a/k/a "Lex," WILLIAM HILL, a/k/a "Eway," a/k/a "Skinny," and CARLOS MERCADO, a/k/a "Kiz," a/k/a "Kizzle," the defendants, and others known and unknown, would and did receive, possess, conceal, store, barter, sell, and dispose of goods, wares, merchandise, securities, and money of the value of \$5,000 and more, and pledge and accept as security for a loan goods, wares, and merchandise, and securities, of the value of \$500 and more, which had crossed a State and United States boundary after being stolen, unlawfully converted, and taken, knowing the same to have been stolen, unlawfully converted, and taken, in violation of Title 18, United States Code, Section 2315.

Overt Acts

21. In furtherance of the conspiracy and to effect the illegal objects thereof, the following overt acts, among others, were committed in the Southern District of New York and

elsewhere:

a. On or about May 4, 2023, MICHAEL EDWARDS, a/k/a “Only1Giel,” the defendant, stole a check (“Check-1”) made payable to a certain company and sent it to another co-conspirator (“CC-3”) and directed CC-3 to wash the check.

b. On or about May 12, 2023, CC-3 communicated with EDWARDS on Telegram and stated, in substance and in part, that CC-3 was in the process of “cleaning” Check-1.

c. On or about May 19, 2023, EDWARDS communicated with CC-3 on Telegram and directed CC-3 to re-write Check-1, making it payable to the owner of a dirty bank account (“Accountholder-1”). CC-3 then sent EDWARDS a picture of the re-written check.

d. On or about June 12, 2023, WILLIAM HILL, a/k/a “Eway,” a/k/a “Skinny,” the defendant, sent EDWARDS a photograph of a check (“Check-2”) made payable to a certain individual.

e. On or about June 13, 2023, EDWARDS communicated with CC-3 on Telegram and directed CC-3 to re-write Check-2, making it payable to the owner of a dirty bank account (“Accountholder-2”).

f. On or about June 9, 2023, SHAKEEMO HILL, a/k/a “Keemo,” a/k/a “LBA Menace,” a/k/a “Lex,” the defendant, sent a text message to EDWARDS that contained the bank account information for a dirty bank account owned by another individual (“Accountholder-3”). Another co-conspirator (“CC-4”) re-wrote Check-3, making it payable to Accountholder-3. On or about the same date, SHAKEEMO HILL sent EDWARDS a photograph on Telegram of a deposit slip indicating Check-3, made payable to Accountholder-3, had been deposited at a particular bank branch.

g. On or about July 5, 2023, EDWARDS possessed a check that he had stolen from the mail (“Check-4”) and directed CC-4 to wash Check-4 and make it payable to another individual. On the same date, CC-4 sent EDWARDS the altered version of Check-4.

h. On or about July 10, 2023, EDWARDS and CARLOS MERCADO, a/k/a “Kiz,” a/k/a “Kizzle,” the defendant, approached a blue mail collection box located in the vicinity of Lexington Avenue and East 74th Street in New York, New York, with the intent to steal mail.

i. On or about July 10, 2023, MERCADO drove a vehicle in which EDWARDS was a passenger, and the vehicle contained stolen mail, in New York, New York.

j. At least on or about June 28, 2024, EDWARDS posted on Telegram a photograph of three checks with the sender and recipient information obscured, along with a request to “Pm” (*i.e.*, personal message) EDWARDS “for slips” (*i.e.*, stolen checks) and that “[e]verything sold is shredded.”

(Title 18, United States Code, Sections 371 and 3147(1).)

COUNT FOUR
(Theft of a Postal Key)

The Grand Jury further charges:

22. The allegations contained in paragraphs one through ten of this Superseding Indictment are repeated, realleged, and incorporated as if fully set forth herein.

23. On or about July 10, 2023, in the Southern District of New York and elsewhere, MICHAEL EDWARDS, a/k/a “Only1Giela,” and CARLOS MERCADO, a/k/a “Kiz,” a/k/a “Kizzle,” the defendants, knowingly stole, purloined, embezzled, and obtained by false pretense a key suited to a lock adopted by the Post Office Department and the Postal Service and in use on the mails and bags thereof, and a key to a lock box, lock drawer, and other authorized receptacle for the deposit and delivery of mail matter, and knowingly and unlawfully made, forged, and

counterfeited such a key, and possessed such mail lock and key with the intent unlawfully and improperly to use, sell, and otherwise dispose of the same, and to cause the same to be unlawfully and improperly used, sold, and otherwise disposed of, to wit, EDWARDS and MERCADO possessed, used, and aided and abetted the possession and use of, a stolen mailbox key belonging to the USPS, with the intent to use such key to steal mail from a locked mailbox in New York, New York.

(Title 18, United States Code, Sections 1704 and 2.)

COUNT FIVE
(Theft of Mail and Receipt of Stolen Mail)

The Grand Jury further charges:

24. The allegations contained in paragraphs one through ten of this Superseding Indictment are repeated, realleged, and incorporated as if fully set forth herein.

25. On or about July 10, 2023, in the Southern District of New York and elsewhere, MICHAEL EDWARDS, a/k/a “Only1Giela,” and CARLOS MERCADO, a/k/a “Kiz,” a/k/a “Kizzle,” the defendants, knowingly stole, took, and abstracted, and by fraud and deception obtained, and attempted so to obtain, from and out of the mail, a post office, and a station thereof, a letter box, a mail receptacle, and a mail route and other authorized depository for mail matter, and from a letter and mail carrier, a letter, postal card, package, bag, and mail, and abstracted and removed from such letter, package, bag, and mail, an article and thing contained therein, and secreted, embezzled, and destroyed such letter, postal card, package, bag, and mail, and an article and thing contained therein, and stole, took, and abstracted, and by fraud and deception obtained a letter, postal card, package, bag, and mail, and an article and thing contained therein which had been left for collection upon and adjacent to a collection box and other authorized depository of mail matter, and bought, received, and concealed, and unlawfully had in their possession, a letter,

postal card, package, bag, and mail, and an article and thing contained therein, which had been so stolen, taken, embezzled, and abstracted, knowing the same to have been stolen, taken, embezzled, and abstracted, to wit, EDWARDS and MERCADO stole mail from a mailbox in New York, New York, and possessed stolen mail and aided and abetted the possession of stolen mail.

(Title 18, United States Code, Sections 1708 and 2.)

COUNT SIX
(Aggravated Identity Theft)

The Grand Jury further charges:

26. The allegations contained in paragraphs one through ten of this Superseding Indictment are repeated, realleged, and incorporated as if fully set forth herein.

27. From at least in or about January 2022 through at least in or about October 2023, in the Southern District of New York and elsewhere, MICHAEL EDWARDS, a/k/a “Only1Giela,” while released under Chapter 207 of Title 18 of the United States Code, SHAKEEMO HILL, a/k/a “Keemo,” a/k/a “LBA Menace,” a/k/a “Lex,” WILLIAM HILL, a/k/a “Eway,” a/k/a “Skinny,” ALIXANDRIA LAUTURE, a/k/a “A\$,” and SHURON MALONE, a/k/a “First Name Last Name,” the defendants, knowingly transferred, possessed, and used, without lawful authority, a means of identification of another person, during and in relation to a felony violation enumerated in Title 18, United States Code, Section 1028A(c), to wit, EDWARDS, SHAKEEMO HILL, WILLIAM HILL, LAUTURE, and MALONE, used and transferred the names, addresses, and bank card numbers of other persons during and in relation to the conspiracy to commit bank fraud charged in Count One of this Superseding Indictment.

(Title 18, United States Code, Sections 1028A(a)(1), 1028A(b), 3147(1), and 2.)

FORFEITURE ALLEGATIONS

28. As a result of committing the offense alleged in Count One of this Superseding

Indictment, MICHAEL EDWARDS, a/k/a "Only1Giela," SHAKEEMO HILL, a/k/a "Keemo," a/k/a "LBA Menace," a/k/a "Lex," WILLIAM HILL, a/k/a "Eway," a/k/a "Skinny," ALIXANDRIA LAUTURE, a/k/a "A\$," and SHURON MALONE, a/k/a "First Name Last Name," the defendants, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(2)(A), any and all property constituting, or derived from, proceeds the defendants obtained directly or indirectly, as a result of the commission of said offense, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense.

29. As a result of committing the offense alleged in Count Three of this Superseding Indictment, MICHAEL EDWARDS, a/k/a "Only1Giela," SHAKEEMO HILL, a/k/a "Keemo," a/k/a "LBA Menace," a/k/a "Lex," WILLIAM HILL, a/k/a "Eway," a/k/a "Skinny," and CARLOS MERCADO, a/k/a "Kiz," a/k/a "Kizzle," the defendants, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c), any and all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of said offense, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense.

30. As a result of committing the offense alleged in Count Five of this Superseding Indictment, MICHAEL EDWARDS, a/k/a "Only1Giela," and CARLOS MERCADO, a/k/a "Kiz," a/k/a "Kizzle," the defendants, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c), any and all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of said offense, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense.

Substitute Assets Provision

31. If any of the above-described forfeitable property, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendants up to the value of the above forfeitable property.

(Title 18, United States Code, Sections 981 and 982;
Title 21, United States Code, Section 853; and
Title 28, United States Code, Section 2461.)


FOREPERSON


JAY CLAYTON
United States Attorney