

) Mandatory Sentence: 2 Years Imprisonment
) NMT: \$250,000 Fine
) NMT: 3 Years Supervised Release
) Class E felony
)
) COUNT EIGHTEEN: Defendants 4 and 11
) **False Statement to Federal Agent**
) 18 U.S.C. §§ 1001(a)(2) and 2
) NMT: 5 Years Imprisonment
) NMT: \$250,000 Fine
) NMT: 3 Years Supervised Release
) Class D Felony
)
) Maximum Punishment if Convicted
) on All Counts:
)
) Defendant Beecham (1):
) Not more than 5 years imprisonment
) Not more than \$250,000 Fine
) 3 Years Supervised Release
) Order of Restitution
) \$100 Mandatory Special Assessment
) (Each Count)
)
) Defendant Everett (2):
) Not less than 2 years imprisonment
) Not more than 56 years imprisonment
) \$1,750,000 Fine
) 3 Years Supervised Release
) Order of Restitution
) \$100 Mandatory Special Assessment
) (Each Count)
)
) Defendant Thompson (3):
) Not less than 2 years imprisonment
) Not more than 22 years imprisonment
) \$750,000 Fine
) 3 Years Supervised Release
) Order of Restitution

) \$100 Mandatory Special Assessment
) (Each Count)
)
) Defendant Simmons (4):
) Not less than 2 years imprisonment
) Not more than 27 years imprisonment
) \$1,000,000 Fine
) 3 Years Supervised Release
) Order of Restitution
) \$100 Mandatory Special Assessment
) (Each Count)
)
) Defendant Ross (5):
) Not less than 2 years imprisonment
) Not more than 22 years imprisonment
) Not more than \$750,000 Fine
) 3 Years Supervised Release
) Order of Restitution
) \$100 Mandatory Special Assessment
) (Each Count)
)
) Defendant Grisby (6):
) Not less than 2 years imprisonment
) Not more than 56 years imprisonment
) \$1,750,000 Fine
) 3 Years Supervised Release
) Order of Restitution
) \$100 Mandatory Special Assessment
) (Each Count)
)
) Defendant Findley (7):
) Not less than 2 years imprisonment
) Not more than 22 years imprisonment
) \$750,000 Fine
) 3 Years Supervised Release
) Order of Restitution
) \$100 Mandatory Special Assessment
) (Each Count)
)

) Defendant Walker (8):
) Not less than 2 years imprisonment
) Not more than 22 years imprisonment
) \$750,000 Fine
) 3 Years Supervised Release
) Order of Restitution
) \$100 Mandatory Special Assessment
) (Each Count)
)

) Defendant Richard (9):
) Not less than 2 years imprisonment
) Not more than 22 years imprisonment
) \$750,000 Fine
) 3 Years Supervised Release
) Order of Restitution
) \$100 Mandatory Special Assessment
) (Each Count)
)

) Defendant Harrison (10):
) Not less than 2 years imprisonment
) Not more than 22 years imprisonment
) \$750,000 Fine
) 3 Years Supervised Release
) Order of Restitution
) \$100 Mandatory Special Assessment
) (Each Count)
)

) Defendant Calhoun (11):
) Not less than 2 years imprisonment
) Not more than 22 years imprisonment
) \$750,000 Fine
) 3 Years Supervised Release
) Order of Restitution
) \$100 Mandatory Special Assessment
) (Each Count)
)

I N D I C T M E N T

THE GRAND JURY CHARGES THAT:

COUNT ONE (Conspiracy)

1. Beginning at least as early as on or about January 27, 2009, and continuing to at least as recently as on or about November 13, 2009, in the Western District of Missouri and elsewhere, **MAURICE BEECHAM, BENJAMIN EVERETT, QEAUNA THOMPSON, EDWON SIMMONS, TYRONE ROSS, MARCUS GRISBY, MARLENE FINDLEY, CHIKOSI WALKER, PERCY RICHARD, DEMETRIA HARRISON, and MONIQUE CALHOUN**, defendants herein, did knowingly and with intent to defraud, conspire and agree with each other and with others known and unknown to the Grand Jury, to commit violations of Title 18, United States Code, Sections (a)(5)(Access Device Fraud), and 1028A(a)(1)(Aggravated Identity Theft) by devising and executing a scheme and artifice to defraud, which was to obtain stolen access device information consisting of credit and debit card numbers, together with the matching cardholder names, expiration dates, security codes, billing addresses, and other means of identification, without the knowledge and without the authority of the cardholders, who were actual persons, hereinafter "identity theft victims," and without lawful authority, and then transmitting and causing to be transmitted false and fraudulent pretenses, representations, and promises, namely the stolen access device information and means of identification belonging to the identity theft victims, to make fraudulent purchases on the reservation systems of the

domestic airline industry of the United States, in order to effect financial transactions, which were the fraudulent purchases of airline tickets using stolen access device information and means of identification of the identity theft victims, by which **MAURICE BEECHAM, BENJAMIN EVERETT, QEAUNA THOMPSON, EDWON SIMMONS, TYRONE ROSS, MARCUS GRISBY, MARLENE FINDLEY, CHIKOSI WALKER, PERCY RICHARD, DEMETRIA HARRISON, and MONIQUE CALHOUN** received things of an aggregate value equal to or exceeding \$1,000 during a one-year period, and the transactions affected interstate commerce.

2. The object of the conspiracy was to create and operate a nationwide “black market” for the sale of airline tickets by using stolen credit and debit card information of the identity theft victims to make purchases of airline tickets through the reservation systems of the domestic airline industry. **MAURICE BEECHAM, BENJAMIN EVERETT, QEAUNA THOMPSON, EDWON SIMMONS, TYRONE ROSS, MARCUS GRISBY, MARLENE FINDLEY, CHIKOSI WALKER, PERCY RICHARD, DEMETRIA HARRISON, and MONIQUE CALHOUN** worked together and with others known and unknown to the grand jury to use stolen credit and debit card information to make fraudulent purchases of airline tickets and to obtain the confirmation codes for the tickets, which were forwarded to the passengers, who were purchasing the tickets at a deep discount of their true value.

MANNER AND MEANS

3. The manner and means by which the conspiracy was sought to be accomplished included, among others, the following:

- a. **BENJAMIN EVERETT, TYRONE ROSS, EDWON SIMMONS, MARCUS GRISBY and QEAUNA THOMPSON** acted as black market travel agents (collectively referred to as the “black market travel agents”). They used stolen credit card and debit card numbers and means of identification of the cardholders to purchase airline reservations for the scheme’s customers. The black market travel agents generally purchased reservations close to the time of departure, in order to increase the likelihood that the airlines, credit card or debit card companies, or identity theft victims would not detect the fraudulent purchases, and have the tickets canceled. As a result, a passenger could often complete his or her trip before the credit or debit card was detected as being compromised. The black market travel agents typically booked the reservations in the passengers’ actual name. On occasion the black market travel agents would misspell a customer’s name in order to further evade the airlines’ fraud detection systems. The black market travel agents charged their customers far less than the value of a legitimately purchased reservation. The black market travel

agents accepted payments from their customers or through their passenger brokers or referral sources in the form of cash, wire transfers, and deposits in the black market travel agents' bank accounts. The black market travel agents profited from the scheme by purchasing the stolen credit and debit card information of the identity theft victims at a nominal cost, then using the stolen information to purchase the airline tickets at no cost to themselves, and then selling the confirmation codes of the airline tickets to customers of the conspirators.

- b. The black market travel agents worked together to further the scheme. The black market travel agents would share stolen credit card or debit card information, and would also ask other black market travel agents for assistance in purchasing fraudulent reservations for their respective customers, particularly when one black market travel agent was unavailable or out of stolen credit or debit card information.
- c. The black market travel agents maintained one or more sources for stolen credit and debit card information. One source for the black market travel agents was **MAURICE BEECHAM**. **BEECHAM** sold stolen credit or debit card information to **BENJAMIN EVERETT**, **TYRONE ROSS**, **EDWON SIMMONS**, and **MARCUS GRISBY** to further the black market travel scheme. On at least one occasion,

BEECHAM obtained the stolen credit or debit cards from a source in Vietnam. **BEECHAM** used telephone numbers 773-407-7392 and 773-406-5942, and the email address pipel23@yahoo.com to communicate with the black market travel agents, and to further the back market travel scheme.

- d. **MARLENE FINDLEY, CHIKOSI WALKER, and PERCY RICHARD**, and others known and unknown to the grand jury, acted as passenger brokers or referral sources for the black market travel scheme. They referred passengers, who were seeking discount airline tickets to the black market travel agents. **FINDLEY, WALKER, and RICHARD** knew that the black market travel agents would obtain the airline reservations by using stolen credit or debit card information. In addition, **WALKER** obtained fraudulently purchased airline reservations for himself through the black market travel agents' scheme. **DEMETRIA HARRISON** referred passengers to **FINDLEY**, who would then refer **HARRISON's** passengers to the black market travel agents' scheme.
- e. Through this black market travel scheme hundreds of credit or debit cards have been compromised, and more than \$1,000,000 worth of fraudulent charges have been made or attempted.

- f. The conspirators used cellular telephones, email accounts, and other forms of electronic communication and storage, to communicate with each other and their customers in furtherance of the conspiracy and to transfer, possess, and use stolen credit and debit card information, the means of identification of the identity theft victims, and passenger names, routes, and ticket confirmation numbers. The instrumentalities of the electronic communication and storage included email accounts (including dudeb51@yahoo.com and pipel23@yahoo.com) and telephone numbers, including:

773-632-6839	773-269-0223	773-220-9819
770-709-2875	404-645-6085	708-870-4040
773-407-7392	480-274-8088	404-713-1893
773-517-7049	773-677-2213	773-494-2933
224-650-0005	770-709-7001	770-985-1365
773-406-5942	773-273-5098	773-766-7007
312-504-0268	773-648-1120	773-991-3963

- g. Using computers and cellular phones, the black market travel agents were able to access the online reservations systems and voice call centers of the domestic airlines industry to make reservations for

airline tickets, which were purchased with credit and debit cards belonging to the identity theft victims.

- h. Upon successfully purchasing airline tickets in this manner, the black market travel agents would obtain confirmation numbers for the tickets. The black market travel agents would then forward the confirmation number to the passenger or person who referred the passenger to them. The passenger could use the confirmation number to obtain boarding passes allowing them to board an aircraft as if a ticket had been legitimately purchased.
- i. **EDWON SIMMONS** and **MONIQUE CALHOUN** worked together to develop a false story to tell federal agents in order to conceal the existence of the conspiracy.

OVERT ACTS

4. In furtherance of the conspiracy and to effect the objects of the conspiracy, the following overt acts, among others, were committed in the Western District of Missouri and elsewhere, and such acts were in and affected interstate commerce:

- a. On or about March 1, 2009, defendant **DEMETRIA HARRISON**, using cell phone 404-645-6085, made voice calls and sent text messages to defendant **MARLENE FINDLEY**, who was using 770-709-2875, requesting assistance in obtaining airline tickets for two

passengers, one flying from Detroit to Atlanta, and the other flying from Detroit to Kansas City. **MARLENE FINDLEY** then sent text messages to **BENJAMIN EVERETT** at 773-632-6839, to request his assistance in purchasing the tickets for the two passengers.

BENJAMIN EVERETT agreed to do so. Shortly thereafter, **MARLENE FINDLEY** sent via text message the Delta Air Lines confirmation codes to **DEMETRIA HARRISON** for the two tickets. The ticket for the passenger traveling to Kansas City, Missouri had been purchased online with a stolen American Express Card number ending in 1000, belonging to DS of Denver, Colorado.

- b. On or about March 2, 2009, **BENJAMIN EVERETT** used 773-632-6839 to send text messages to **MARLENE FINDLEY**'s cell phone, 770-709-2875, instructing her to deposit \$200 into a Washington Mutual Bank account #8844776308, belonging to **QEAUNA THOMPSON**.
- c. On or about March 18, 2009, **BENJAMIN EVERETT** used 773-632-6839, to book Delta Air Lines tickets for two passengers to fly from Bloomington-Normal, Illinois to Atlanta, Georgia on March 19, 2009. A stolen Citibank MasterCard number ending in 6254 was

used to pay \$1,579.20 for the tickets. A third Delta ticket was charged to the same card, bringing the total amount of fraudulently purchased tickets and baggage fees to \$1,988.80. The stolen Citibank MasterCard ending in 6254 belonged to identity theft victim CK of Raytown, Missouri, in the Western District of Missouri, who did not authorized the charges on her CitiBank MasterCard.

- d. On or about April 2, 2009, defendant **PERCY RICHARD**, using 404-713-1893, sent a text message to defendant **BENJAMIN EVERETT** at 773-632-6839, requesting an airline ticket for a passenger to fly from Kansas City to Detroit the next morning. Defendant **BENJAMIN EVERETT** forwarded the text message to 773-220-9819, a cell phone used by defendant **QEAUNA THOMPSON**. **QEAUNA THOMPSON** used the Comcast Internet connection at her residence, 5327 W. Congress, Chicago, Illinois, to book the ticket through the United Airlines reservation website, using a stolen JP Morgan Chase VISA credit card number ending in 9812, belonging to JP of Patterson, New Jersey. Later the same day, **QEAUNA THOMPSON** sent a text message to **BENJAMIN EVERETT**, which contained the United Airlines confirmation code, LQM8VY for the ticket, and **BENJAMIN EVERETT** forwarded it

to **PERCY RICHARD** via text message. The total amount of fraud charges posted to the VISA card account was \$4,531.07.

- e. On or about May 1, 2009, **CHIKOSI WALKER** obtained from his co-conspirators airline tickets for himself and one other passenger to fly from Chicago to New Orleans on United Airlines. The tickets were booked online from the Comcast Internet connection at the residence of **QEAUNA THOMPSON**, 5327 W. Congress Parkway, Chicago, Illinois, using a stolen Navy Federal Credit Union VISA card ending in 3868, belonging to SM of Richland, Washington. SM's VISA card number was also used to book a hotel room in New Orleans through priceline.com. The total amount of fraudulent charges posted to SM's Visa account was \$3,885.28.
- f. On or about May 4, 2009, **CHIKOSI WALKER** obtained from his co-conspirators two first class airline tickets for himself and one other passenger to fly from New Orleans to Chicago on United Airlines. The tickets were booked online from the Comcast Internet connection at the residence of **QEAUNA THOMPSON**, 5327 W. Congress Parkway, Chicago, Illinois, using a stolen Chase Bank VISA card ending in 0721, belonging to DN of Diablo, California. Each ticket cost \$1,370.80. In addition to the fraudulent purchases

of United Airlines tickets for **CHIKOSI WALKER** and his traveling companion, twenty-eight additional airline tickets were purchased for tickets on United Airlines, Delta Air Lines, and Southwest Airlines, using DN's Visa card. Together with baggage fees and one charge at a Four Points Sheraton, the total amount of fraudulent charges on this account was \$11,493.92.

- g. On or about May 6, 2009, **CHIKOSI WALKER** obtained from his co-conspirators airline tickets for himself to fly from Chicago to Los Angeles on United Airlines. The ticket was booked online from the RCN wi-fi Internet connection at a residence near the apartment of **EDWON SIMMONS**, 3021 S. Michigan Avenue, Chicago, Illinois, using a stolen Commerce Bank VISA debit card ending in 9989, belonging to BF of Raytown, Missouri. The total amount of fraudulent charges on the VISA card number was \$1,978.99.
- h. On or about August 1, 2009, **CHIKOSI WALKER** paid **QEAUNA THOMPSON** for an airline ticket to fly a passenger from Chicago, Illinois to Kansas City, Missouri, knowing that the ticket would be charged to the account of a stolen credit or debit card.
- i. On or about August 19, 2009, a resident of Lee's Summit, Missouri, using 913-687-6881, exchanged a series of text messages with the

cell phone of **EDWON SIMMONS**, 773-269-0223, to arrange an airline ticket for a passenger to fly from Kansas City, Missouri, to Palm Springs, California.

- j. On or about August 20, 2009, defendant **EDWON SIMMONS** received a call on his cell phone 773-269-0223, from defendant **TYRONE ROSS** who was using 312-503-0278, during which **EDWON SIMMONS** asked **TYRONE ROSS** to assist him with booking an airline ticket requested by the resident of Lee's Summit, Missouri for a passenger to fly from Kansas City to Palm Springs, California. **TYRONE ROSS** agreed to assist with the ticket, and used a stolen American Express Card number ending in 22003, belonging to BB of Prescott Valley, Arizona, to make an online purchase of a United Airlines ticket, confirmation code LTJC9G. **TYRONE ROSS** booked the ticket online from a computer in his office in the Lurie Building at Northwestern University in Chicago, Illinois. Subsequently, **EDWON SIMMONS** and the Lee's Summit, Missouri resident realized that the ticket had been mistakenly booked for travel from Kansas City to Pasco, Washington, and they agreed to make a second attempt to purchase a ticket from Kansas City to Palm

Springs. The total amount of fraud charges on the American Express Card number was \$577.20.

- k. On or about August 21, 2009, defendant **EDWON SIMMONS** used the Internet connection at a residence in Indianapolis, Indiana to make an online booking for the passenger requested by the Lee's Summit, Missouri resident on United Airlines flight 503 from Kansas City to Denver, then continuing on flight 6626 to Palm Springs, California, confirmation code NOQK2R. The ticket was purchased by **EDWON SIMMONS** using a stolen American Express Card number ending in 22004, belonging to DG of Portland, Oregon. The total amount of fraud charges on the American Express Card number was \$1,365.00.
- l. On or about August 22, 2009, **MONIQUE CALHOUN**, a customer of **EDWON SIMMONS** called 773-269-0223, to advise **EDWON SIMMONS** that a federal agent had called **CALHOUN** to question her about her flights on airline tickets purchased with stolen credit card information. **EDWON SIMMONS**, for the purpose of concealing the existence of the conspiracy, instructed **MONIQUE CALHOUN** to either ignore calls from federal agents or lie to the

agents by telling agents that the airline tickets were bought on Craig's List, an online auction website.

- m. On or about August, 23, 2009, **MONIQUE CALHOUN** answered a call from Postal Inspector Steve Ryan, who questioned her about her airline travel during the summer of 2009. **MONIQUE CALHOUN** admitted that she flew on United Airlines from New York LaGuardia to Denver on August 4, 2009, and for the purpose of concealing the existence of the conspiracy described herein, **MONIQUE CALHOUN** falsely told Postal Inspector Steve Ryan that she bought the ticket "from someone on Craig's List." **MONIQUE CALHOUN** further stated falsely to Postal Inspector Steve Ryan that she paid the Craig's List seller for the ticket with a money order. In the course of the same conversation, **MONIQUE CALHOUN** admitted that she flew on United Airlines from Chicago to New York LaGuardia on July 15, 2009, and for the purpose of concealing the existence of the conspiracy described herein, **MONIQUE CALHOUN** falsely told Postal Inspector Steve Ryan that she bought the ticket "on Craig's List." **MONIQUE CALHOUN** further stated falsely to Postal Inspector Steve Ryan that she paid the Craig's List seller for the ticket with a money order. In the course of the same

conversation, **MONIQUE CALHOUN** admitted that she flew on United Airlines from Los Angeles to Chicago on May 23, 2009, and for the purpose of concealing the existence of the conspiracy described herein, **MONIQUE CALHOUN** falsely told Postal Inspector Steve Ryan that she bought the ticket using "Craig's List." **MONIQUE CALHOUN** further stated falsely to Postal Inspector Steve Ryan that she paid the Craig's List seller for the ticket with a money order.

- n. On or about September 19, 2009, **CHIKOSI WALKER** obtained from his co-conspirators airline tickets for himself and one other passenger to fly a roundtrip from Chicago to Minneapolis/St. Paul on United Airlines. The tickets were booked online from the Comcast Internet connection at the residence of **QEAUNA THOMPSON**, 5327 W. Congress Parkway, Chicago, Illinois, using a stolen American Express Card ending in 81002, belonging to DP of Wantagh, New York. **CHIKOSI WALKER** and the other passenger flew the first leg of the trip to Minneapolis/St. Paul, but United Airlines detected the fraud and canceled the return trip.
- o. On or about September 20, 2009, **CHIKOSI WALKER** obtained from his co-conspirators airline tickets for himself and one other

passenger to fly from Minneapolis/St. Paul to Chicago on United Airlines. The tickets were booked online from the Comcast Internet connection at the residence of **QEAUNA THOMPSON**, 5327 W. Congress Parkway, Chicago, Illinois, using a stolen American Express Card ending in 93001, belonging to RC of Nazareth, Pennsylvania.

- p. On or about October 27, 2009, defendant **MARCUS GRISBY**, using 773-273-5098, took an order over his cell phone for five passengers to fly from Chicago to Kansas City, and he agreed to arrange for all five passengers to fly together on United flight 533 to Kansas City the following day. On or about October 28, 2009, four of the tickets were purchased with a stolen Capitol One MasterCard credit card number ending in 1920, belonging to TH of Tennille, Georgia, and the fifth ticket was purchased with a stolen Chase Bank MasterCard credit card number ending in 1039, belonging to LM of Vero Beach, Florida.
- q. On or about October 28, 2009, defendant **MARCUS GRISBY**, using 773-273-5098, took an order via voice and text messages to and from his cell phone for five passengers to fly from Kansas City to Chicago, and he agreed to arrange for all five passengers to fly

together on United flight 690 on October 30, 2009. On or about October 29, 2009, four of the five tickets were purchased with a stolen Discover Card ending in 9556, belonging to JG of Tucson, Arizona. Three additional airline tickets on United and Delta flights were purchased on or about October 29 and 30, 2009, using the same stolen Discover Card number for a total amount of fraudulent charges of \$1,903.72.

- r. On or about November 2, 2009, defendant **BENJAMIN EVERETT**, using 773-766-7007, exchanged a series of voice calls and text messages to accept an order for three passengers to fly from Chicago to Atlanta on Delta Air Lines. All three tickets were purchased with a stolen GE Money credit card ending in 6255, belonging to HA of Pasadena, Texas. The same card was also used by the conspirators to buy four additional tickets on United Airlines, for a total amount of fraudulent charges for airline tickets of \$2,843.70.
- s. On or about November 8 and 9, 2009, defendant **BENJAMIN EVERETT**, using 773-766-7007 and 708-870-4040, accepted a voice call order for four passengers to fly from Chicago to Los Angeles. **BENJAMIN EVERETT** agreed to book these tickets and

six other reservations for \$1,000. On or about November 8, 2009, in Chicago, Illinois, **BENJAMIN EVERETT** accepted a cash payment of \$1,000 for the requested tickets. On or about November 9, 2009, the four requested tickets were booked on United Airlines. Two of the tickets were booked using a stolen Discover Card number ending in 9965, belonging to LT of New Britain, Connecticut, for a total of \$732.20. Additional fraudulent charges were made on the same Discover Card for tickets for Delta Air Lines, Southwest Airlines, and a non-airline vendor, for a total amount of \$3,823.76 in fraudulent charges. The second pair of tickets were booked using a stolen Discover Card ending in 6206, belonging to JM of Fuquay Varina, North Carolina, for a total of \$732.20. Two additional United Airlines tickets and two non-airline vendors were charged on the same Discover Card for a total amount of \$1,424.77 in fraudulent charges.

- t. On or about November 11, 2009, defendant **BENJAMIN EVERETT**, using 708-870-4040, exchanged voice calls and text messages to accept an order for two passengers to fly from Los Angeles to Chicago. The United Airlines tickets were purchased with a stolen Discover Card ending in 3053, belonging to LP of

Mayfield, Kentucky. Additional United Airlines and Delta Air Lines tickets were charged to the same Discover Card for a total amount of \$4,771.50 in fraudulent charges.

- u. On or about November 13, 2009, **BENJAMIN EVERETT**, using 708-870-4040, exchanged voice calls and text messages to accept an order for a passenger to fly from St. Louis to Chicago on United Airlines. The ticket was purchased with a stolen American Express card ending in 11017, belonging to JO of Washington, D.C. There were additional charges on the same American Express Card for tickets booked on United Airlines, Delta Airlines, and US Airways, as well as one charge for a non-airline vendor for a total of at least \$4,053.12 in fraudulent charges.

All in violation of Title 18, United States Code, Section 371.

COUNTS TWO through NINE
(Access Device Fraud)

1. The Grand Jury incorporates by reference paragraphs one through four of Count One of the Indictment as if fully set forth herein.
2. On or about the dates alleged below, in the Western District of Missouri and elsewhere, in furtherance of the conspiracy to commit access device fraud and aggravated identity theft and to accomplish the goals of the conspiracy's scheme to defraud the airlines the credit and debit card issuers and their cardholders, who were the identity theft

victims, the defendants named below did knowingly and with intent to defraud, effect and attempt to effect financial transactions using access devices consisting of the accounts described in each count below and issued in the names of the identity theft victims below, by which the defendants named below received things of an aggregate value equal to and exceeding \$1,000 during a one-year period, and which transactions affected interstate commerce, as follows:

<u>Counts</u>	<u>Dates</u>	<u>Amounts</u>	<u>Credit Issuers</u>	<u>ID Theft Victims</u>	<u>Defendants</u>
2	03/01/09	At least \$2,267.61	American Express	DS, Denver, CO	HARRISON FINDLEY
3	03/18/09	\$1,988.80	CitiBank	CK, Raytown, MO	EVERETT
4	04/02/09	\$4,531.07	JP Morgan Chase	JP, Patterson, NJ	RICHARD EVERETT THOMPSON
5	05/06/09	\$1,978.99	Commerce Bank	BF, Raytown, MO	WALKER
6	08/21/09	\$1,365.00	American Express	DG, Portland, OR	ROSS SIMMONS
7	10/27/09	\$1,270.13	Capitol One	TH, Tennille, GA	GRISBY
8	10/27/09	\$1,554.00	Chase	LM, V. Beach, FL	GRISBY
9	10/29/09	\$1,903.72	Discover	JG, Tucson, AZ	GRISBY

All in violation of Title 18, United States Code, Sections 1029(a)(5) and 2.

COUNTS TEN through SEVENTEEN
(Aggravated Identity Theft)

1. The Grand Jury incorporates by reference paragraphs one through four of Count One of the Indictment as if fully set forth herein.

2. On or about the dates listed below, in the Western District of Missouri and elsewhere, in furtherance of the conspiracy to commit access device fraud and aggravated identity theft and to accomplish the goals of the conspiracy's scheme to defraud the airlines, the credit and debit card issuers and their cardholders, who were the identity theft victims, by transferring, possessing, and using means of identification of the identity theft victims consisting of stolen credit and debit card numbers, together with the cardholder names, expiration dates, security codes, and billing addresses to effect and attempt to effect transactions with access devices issued to the identity theft victims to receive payment and things of value, consisting of confirmation codes for airline tickets, the passenger seats associated with each ticket confirmation code, and payments of money from customers requesting the tickets, the aggregate value of which was in excess of \$1,000 during a one-year period, the defendants named below did knowingly and without lawful authority transfer, use, and possess one or more means of identification of other persons, as identified in each count below, during and in relation to a predicate felony offense, that being access device fraud as defined by Chapter 47, Title 18, United States Code, Section 1029(a)(5), and such actions were in or affected interstate commerce, as follows:

<u>Counts</u>	<u>Dates</u>	<u>Airline Tickets Purchased:</u>	<u>ID Theft Victims</u>	<u>Defendants</u>
10	03/01/09	Detroit, MI, to Kansas City, MO	DS, Denver, CO	HARRISON FINDLEY
11	03/18/09	Bloomington-Normal, IL to Atlanta, GA	CK, Raytown, MO	EVERETT
12	04/02/09	Kansas City, MO to Detroit, MI	JP, Patterson, NJ	RICHARD EVERETT THOMPSON
13	05/06/09	Chicago, IL to Los Angeles, CA	BF, Raytown, MO	WALKER
14	08/21/09	Kansas City, MO to Palm Springs, CA	DG, Portland, OR	ROSS SIMMONS
15	10/27/09	Chicago, IL to Kansas City, MO	TH, Tennille, GA	GRISBY
16	10/27/09	Chicago, IL to Kansas City, MO	LM, V. Beach, FL	GRISBY
17	10/29/09	Chicago, IL to Kansas City, MO	JG, Tucson, AZ	GRISBY

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

COUNT EIGHTEEN
(False Statement)

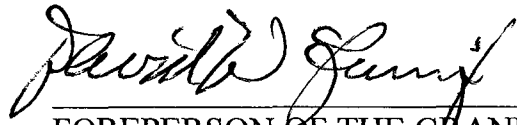
1. The Grand Jury incorporates by reference paragraphs one through four of Count One of the Indictment as if fully set forth herein.

2. On or about August 23, 2009, in the Western District of Missouri and elsewhere, in a matter within the jurisdiction of the United States Postal Inspection Service, the defendant **MONIQUE CALHOUN**, knowingly and willfully made a false, fictitious and fraudulent statement, which was caused to be made by defendant **EDWON SIMMONS**, by

stating to Postal Inspector Steve Ryan that she had purchased airline tickets on "Craig's List," however she then and there well knew and believed such statement was false, fictitious, and fraudulent because she knew she had purchased the airline tickets from **EDWON SIMMONS**, and she knew the statement was material in concealing the existence of the conspiracy of **EDWON SIMMONS** and others to operate a nationwide black market for the sale of airline tickets purchased with stolen credit and debit card information, and specifically to conceal the role of **EDWON SIMMONS** in the conspiracy.

All in violation of Title 18, United States Code, Sections 1001(a)(2) and 2.

A TRUE BILL.



FOREPERSON OF THE GRAND JURY



John E. Cowles #11797 and Matt Hiller
Assistant United States Attorneys

6/30/2010
Date