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IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

DEMETRIA HARRISON, (1)

[DOB: 06/08/1970],

SABRINA BOWERS, (2)

[DOB: 11/25/1980],

DEIDRE TURNER, (3)

[DOB: 10/28/1982], and

BENJAMIN SUBER, (4)

[DOB: 01/29/1984],

Defendants.

Case No. 10-00195-D1/04-CR-W-DW

COUNT ONE: Defendants 1 through 4

Conspiracy

18 U.S.C. § 371

NMT: 5 Years Imprisonment

NMT: \$250,000 Fine

NMT: 3 Years Supervised Release

Class D Felony

COUNTS TWO through FOUR: Defendant 1

Access Device Fraud

18 U.S.C. §§ 1029(a)(5) and 2

NMT: 15 Years Imprisonment

NMT: \$250,000 Fine

NMT: 3 Years Supervised Release

Class C Felony

COUNTS FIVE through SEVEN: Defendant 1

Aggravated Identity Theft

18 U.S.C. §§ 1028A(1) and 2

Mandatory Sentence: 2 Years Imprisonment

NMT: \$250,000 Fine

NMT: 3 Years Supervised Release

Class E Felony

Maximum Punishment if Convicted

on All Counts:

Defendant Harrison (1):

Not less than 2 years imprisonment

Not more than 56 years imprisonment

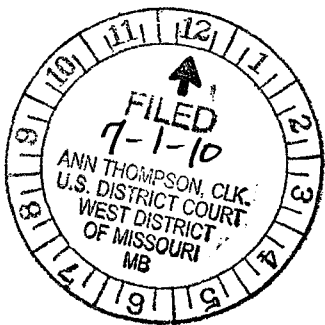
\$1,750,000 Fine

3 Years Supervised Release

Order of Restitution

\$100 Mandatory Special Assessment

(Each Count)



) Maximum Punishment if Convicted:
) Defendants 2, 3, 4:
) NMT: 5 Years Imprisonment
) NMT: \$250,000 Fine
) NMT: 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 December 1, 2001, and continuing to at least as recently as January 15, 2009, in the Western District of Missouri and elsewhere, **SABRINA BOWERS, DEIDRE TURNER, DEMETRIA HARRISON, and BENJAMIN SUBER**, 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 working together and with others known and unknown to the grand jury to possess, transfer, and use 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 effecting transactions using 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, by which **SABRINA BOWERS, DEIDRE TURNER, DEMETRIA HARRISON,** and **BENJAMIN SUBER,** 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. **SABRINA BOWERS, DEIDRE TURNER, DEMETRIA HARRISON,** and **BENJAMIN SUBER,** worked together and with others known and unknown to the grand jury (“the conspirators”) 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 they forwarded to their customers, who were the passengers 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. **DEMETRIA HARRISON** acted as a black market travel agent whose scheme to defraud the airline industry began when

HARRISON lived in Kansas City, Missouri, and she made fraudulent bookings on Trans World Airlines and Vanguard Airlines.

- b. To accomplish her scheme, **DEMETRIA HARRISON, SABRINA BOWERS, DEIDRE TURNER**, and other conspirators acting on their behalf, obtained stolen credit card and debit card numbers and the means of identification of the cardholders from hotels in Overland Park, Kansas and the Atlanta, Georgia metro area where the identity theft victims had stayed as guests, as well as from other co-conspirators both known and unknown to the grand jury who had their own access to stolen credit card and debit card numbers belonging to identity theft victims. **DEMETRIA HARRISON** used the stolen information to purchase airline reservations for her customers and occasionally for herself.
- c. **BENJAMIN SUBER**, the son of **DEMETRIA HARRISON**, assisted the conspiracy by taking orders for tickets over the phone, and by accepting payments from customers on behalf of **DEMETRIA HARRISON**.
- d. The conspirators used cellular telephones, email accounts, and other forms of electronic communication and storage, to communicate with each other and 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, such as shopstyle211@yahoo.com, and telephone numbers such as 770-895-7006, 404-844-3128, 404-645-6085, and 678-598-8857.

- e. The conspirators maintained one or more sources of stolen credit and debit card information belonging to identity theft victims in the United States who upon request would use the information to make fraudulent bookings of airline tickets for the conspirators and for customers of the conspiracy at a price of about half the cost of a legitimately purchased ticket.
- f. Using computers and cellular phones, the conspirators 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.
- g. Upon successfully purchasing airline tickets in this manner, the conspirators would obtain confirmation numbers for the tickets,

which the conspirators and their customers could use to obtain boarding passes allowing them to board an aircraft as if a ticket had been legitimately purchased.

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 November 21, 2005, defendants **DEIDRE TURNER** and **SABRINA BOWERS** stole a Dell laptop computer from a residence in Overland Park, Kansas, for the purpose of using it to make fraudulent purchases of airline tickets using stolen credit and debit card information of the identity theft victims.
- b. On or about November 28, 2005, defendant **DEIDRE TURNER** and unindicted co-conspirator obtained two tickets for a Delta Air Lines flight from Kansas City, Missouri to Atlanta, Georgia, confirmation number CRJYI3, which had been purchased with a stolen VISA card ending in 7056, issued to FH of Valrico, Florida. The ticket was purchased using the stolen Dell laptop and the email address: shopstyle211@yahoo.com, used by **SABRINA BOWERS**.

TURNER obtained her ticket knowing it had been purchased with stolen credit card or debit card information.

- c. On or about April 5, 2006, defendants **DEIDRE TURNER** and **SABRINA BOWERS** flew from Atlanta to Kansas City on Delta tickets purchased with a stolen Discover Card ending in 6283, issued to DF of Highland Village, Texas.
- d. On or about October 27, 2006, defendant **DEIDRE TURNER**, using a means of identification of “Deborah Turner,” attempted to board a Delta Air Lines flight from Kansas City to Atlanta. The ticket had been purchased with a stolen American Express Card issued to DP of Hicksville, New York.
- e. On or about March 3, 2008, defendant **DEIDRE TURNER**, using a means of identification of “Barbara Crawford” and **SABRINA BOWERS** flew on a Delta Air Lines flight from Atlanta to Kansas City, on tickets purchased with a stolen American Express Card issued to DC of Los Angeles, California. The tickets were booked through the online reservation system of Delta Air Lines by defendant **DEMETRIA HARRISON** or another conspirator acting under her direction, from her residence at 7225 Boulder Pass, Union

City, Georgia, using the wi-fi Internet service of her next door neighbors at 7229 Boulder Pass.

- f. On or about November 24, 2008, defendant **DEMETRIA HARRISON**, using 404-645-6085, accepted an order for a Delta Air Lines ticket to fly from Kansas City to Atlanta on November 24, 2008. **DEMETRIA HARRISON** priced the cost of the ticket at about half of the true cost of a legitimately purchased ticket. The Delta ticket was purchased on November 24, 2008, when cell phone number 404-844-3128, belonging to defendant **BENJAMIN SUBER**, called the Delta Air Lines reservation system, to purchase the Kansas City to Atlanta ticket. The Kansas City to Atlanta ticket and six additional tickets for other customers for flights on United Airlines and Delta Air Lines were all purchased with a stolen Wachovia debit card belonging to RB of Palm Beach Gardens, Florida. The total amount of fraudulent charges on the Wachovia debit card was \$2,824.99.
- g. Between on or about December 8, 2008, and on or about December 9, 2008, defendant **DEMETRIA HARRISON**, using 404-645-6085, accepted an order for a Delta Air Lines ticket to fly roundtrip from Atlanta to Kansas City and back to Atlanta on December 10, 2008.

DEMETRIA HARRISON priced the cost of the tickets at about half of the true cost of legitimately purchased tickets. The Delta tickets were purchased on December 9, 2008, when cell phone number 404-844-3128, belonging to defendant **BENJAMIN SUBER**, called the Delta Air Lines reservation system, to purchase the Kansas City to Atlanta ticket. The Kansas City/Atlanta roundtrip tickets and a ticket for another customer for a flight on United Airlines were all purchased with a stolen CitiBank credit card belonging to the joint account of GL and CL of Westville, Oklahoma. The total amount of fraudulent charges, including baggage fees, on the CitiBank credit card was \$1,434.00.

- h. Between on or about December 15, 2008, and on or about December 18, 2008, defendant **DEMETRIA HARRISON**, using 404-645-6085, accepted an order for a ticket from Kansas City to Atlanta on Delta Air Lines. **DEMETRIA HARRISON** priced the cost of the ticket at about half of the true cost of a legitimately purchased ticket. Payment for the ticket was made at the residence of **DEMETRIA HARRISON**, 470 Bluffs Circle, Union City, Georgia, where \$180 cash was given to defendant **BENJAMIN SUBER**. The Kansas City to Atlanta ticket was purchased with a stolen Tucson Federal

Credit Union VISA credit card belonging to KK of Tucson, Arizona.

There was a total of \$698.00 in fraudulent charges on the VISA account.

- i. Between on or about January 9, 2009, and on or about January 15, 2009, defendant **DEMETRIA HARRISON**, using 404-645-6085 and 678-598-8857, accepted an order for a pair of Delta Air Lines tickets for two passengers to fly from Kansas City to Atlanta on January 15, 2009. **DEMETRIA HARRISON** priced the cost of the tickets at about half of the true cost of legitimately purchased tickets. **BENJAMIN SUBER**, used voice calls and text messages on 404-844-3128 to provide the Delta confirmation number for the tickets, and to make arrangements for payment. The Kansas City to Atlanta tickets, and tickets for two other customers for flights on United and Delta were all purchased with a stolen Advanta Bank MasterCard credit card belonging to CE of Baldwin City, Kansas. The total amount of fraudulent charges, including baggage fees, on the Advanta Bank MasterCard credit card was \$1,302.10.

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

COUNTS TWO through FOUR
(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 indicated in each count 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, defendant **DEMETRIA HARRISON** and her accomplices did knowingly and with intent to defraud, 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 **DEMETRIA HARRISON** and her accomplices received things of an aggregate value equal to and exceeding \$1,000 during a one-year period, and said transactions affected interstate commerce, as follows:

<u>Count</u>	<u>Date</u>	<u>Amount</u>	<u>Issuer</u>	<u>ID Theft Victim</u>
2	11/24/08	\$2,824.99	Wachovia Bank	RB, Palm Beach Gardens, FL
3	12/09/08	\$1,434.00	CitiBank	GL, Westville, OK
4	01/15-16/09	\$1,302.10	Advanta Bank	CE, Baldwin City, KS

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

COUNTS FIVE through SEVEN
(Aggravated Identity Theft)

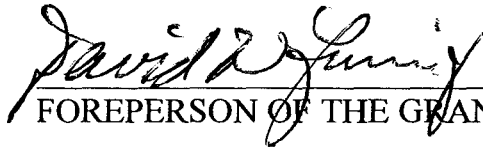
1. The Grand Jury incorporates by reference paragraphs one through four of Count One of the Indictment as if fully set forth herein.


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 card companies 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 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, **DEMETRIA HARRISON**, defendant herein, did knowingly and without lawful authority transfer, use, and possess one or more means of identification of another person, 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 affected interstate commerce, as follows:

<u>Count</u>	<u>Date</u>	<u>Airline Tickets Purchased:</u>	<u>ID Theft Victim</u>
5	11/24/08	Kansas City, Missouri to Atlanta, Georgia	RB, Palm Beach Gardens, FL
6	12/09/08	Kansas City, Missouri to Atlanta, Georgia (roundtrip)	GL, Westville, OK
7	01/15/09	Kansas City, Missouri to Atlanta, Georgia	CE, Baldwin City, KS

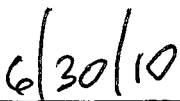
All in violation of Title 18, United States Code, Sections 1028A(a)(1) and 2.

A TRUE BILL.


FOREPERSON OF THE GRAND JURY



John E. Cowles #11797
Assistant United States Attorneys



Date