

Presented to the Court by the foreman of the
Grand Jury in open Court, in the presence of
the Grand Jury and FILED in the U.S.
DISTRICT COURT at Seattle, Washington.

April 3 2024
Ravi Subramanian, Clerk
By [Signature] Deputy

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff,

v.

AMBER TOWNDROW, and
DARBY CANFIELD

Defendants.

NO. **CR 24 - 062 JNW**

INDICTMENT

The Grand Jury charges that:

COUNT 1

(Conspiracy to Commit Bank Fraud)

A. The Offense

1. Beginning at a time unknown, and continuing until on or about September 8, 2023, in King County, within the Western District of Washington, and elsewhere, AMBER TOWNDROW and DARBY CANFIELD did knowingly and willfully combine, conspire, and agree among themselves and with other persons both known and unknown to the Grand Jury to devise and execute a scheme to defraud financial institutions, including, but not limited to, JP Morgan Chase Bank (JPMC), a financial institution as defined by Title 18, United States Code, Section 20, in violation of Title 18, United States Code, Section 1344 (Bank Fraud) and Section 2.

2. The object of the conspiracy was to obtain moneys, funds, and credits under the control of the financial institutions, and held in legitimate accounts of accountholders (victims), without the victims' knowledge or consent. The conspirators accomplished this by obtaining the victims' personal identifying information and fraudulently opening business accounts in the victims' names. The conspirators then transferred the victims' money from the legitimate accounts into the fraudulent business accounts and withdrew the funds using debit cards, money orders, and point of sale transactions.

3. The conspirators repeated this scheme to access, or attempt to access, the bank accounts of at least 17 separate victims and held with numerous financial institutions. The conspirators attempted to obtain at least approximately \$1,400,000 from the victims' accounts, and successfully obtained at least approximately \$664,000.

B. Manner and Means of the Conspiracy and Scheme and Artifice to Defraud

4. At all relevant times, JPMC was a financial institution as defined by Title 18, United States Code, Section 20, as an insured depository institution of the Federal Deposit Insurance Act. JPMC maintained branches throughout the Western District of Washington and elsewhere.

5. AMBER TOWNDROW, DARBY CANFIELD, and other co-conspirators known and unknown to the Grand Jury, acquired the personal identifying information of real persons who held bank accounts at JPMC and other financial intuitions.

6. Using the personal identifying information of their victims, AMBER TOWNDROW, DARBY CANFIELD, and/or other co-conspirators known and unknown to the Grand Jury, submitted business formation materials to the Washington Secretary of State, and the equivalent offices in other states, to obtain business formation paperwork. The business formation paperwork lists the victim as the business's registered agent.

7. AMBER TOWNDROW, utilizing this paperwork and falsified identification documents, such as driver's licenses and passports, that contained a victim's name but AMBER TOWNDROW's photograph, then went to JPMC branches in

1 Seattle and elsewhere to open a business account under the newly-registered business
2 entity and victim's name.

3 8. AMBER TOWNDROW received a debit card for each newly-created
4 business account.

5 9. JPMC's online banking system or the co-conspirators linked the newly-
6 created business accounts to the victims' pre-existing banking accounts. The JPMC
7 online banking system allowed users to transfer funds between accounts linked in this
8 manner.

9 10. AMBER TOWNDROW, DARBY CANFIELD, and/or their co-
10 conspirators known and unknown to the Grand Jury, used the online banking system to
11 transfer funds held in the victims' legitimate bank accounts into the linked fraudulent
12 business accounts controlled by the conspirators.

13 11. AMBER TOWNDROW used the debit cards issued under the business
14 accounts to purchase United States Postal Service and MoneyGram money orders, made
15 payable to various names, as well as high value items, such as Louis Vuitton merchandise
16 and Apple iPhones.

17 12. DARBY CANFIELD, and other co-conspirators known and unknown to
18 the Grand Jury, then cashed the money orders at locations such as MoneyTree, in King
19 County, Washington, and elsewhere.

20 13. For example, AMBER TOWNDROW and/or her co-conspirators submitted
21 business formation paperwork to the state of Colorado to create a business entity called
22 "Smitty Consulting Inc." listing K.S., a real person, as its registered agent. K.S. was the
23 holder of a JPMC personal bank account. AMBER TOWNDROW, posing as K.S., went
24 to a JPMC branch in Seattle where she opened a JPMC business account for that business
25 entity, listed a Seattle address for the business, and received a debit card. AMBER
26 TOWNDROW and/or her co-conspirators transferred approximately \$131,709 from
27 K.S.'s personal account to the fraudulent business account. AMBER TOWNDROW then

1 used the business account debit card to purchase approximately 128 USPS money orders
2 at post office locations in the greater Seattle area, expending approximately \$126,653 of
3 K.S.'s funds. AMBER TOWNDROW caused the money orders to be made payable to
4 various names of people that co-conspirators could impersonate, including a real person
5 with the initials "J.V." DARBY CANFIELD, impersonating J.V., then cashed the money
6 orders made out to J.V. at MoneyTree locations in the greater Seattle area.

7 14. In another example, AMBER TOWNDROW and/or her co-conspirators
8 submitted business formation paperwork to the Washington Secretary of State to create a
9 business entity called "Decast Designs Inc," listing A.C.B., a real person who lived in
10 Texas, as its registered agent. A.C.B. was the holder of a JPMC personal bank account.
11 AMBER TOWNDROW, posing as A.C.B., went to a JPMC branch in Seattle and opened
12 a business bank account for that business entity and received a debit card. AMBER
13 TOWNDROW and/or her co-conspirators transferred approximately \$75,000 from
14 A.C.B.'s legitimate account to the fraudulent business account. AMBER TOWNDROW
15 then used the business account debit card to purchase approximately 50 USPS money
16 orders at post office locations in the greater Seattle area, expending approximately
17 \$49,989 of A.C.B.'s funds. AMBER TOWNDROW caused the money orders to be made
18 payable to various names, including J.V. DARBY CANFIELD, impersonating J.V., then
19 cashed the money orders made out to J.V. at MoneyTree locations in the greater Seattle
20 area.

21 15. AMBER TOWNDROW and other co-conspirators known and unknown to
22 the Grand Jury, executed the scheme in additional states, including, but not limited to,
23 Indiana and Colorado.

24 16. For example, AMBER TOWNDROW and/or her co-conspirators submitted
25 business formation paperwork to the state of Indiana to create a business entity called
26 "Rai Real Property LLC" listing R.S., a real person who lives in New York, as its
27 registered agent. R.S. was the holder of a JPMC personal bank account. AMBER

1 TOWNDROW, posing as R.S., opened a JPMC business account for that business entity
2 and received a debit card. AMBER TOWNDROW and/or her co-conspirators transferred
3 funds from R.S.'s personal account to the fraudulent business account. AMBER
4 TOWNDROW then used the business debit card to purchase approximately \$18,000
5 worth of USPS money orders at post offices in the greater Indianapolis area.

6 17. In another example, AMBER TOWNDROW and/or her co-conspirators
7 obtained the personal identifying information of N.Z., a real person and JPMC
8 accountholder living in Colorado. AMBER TOWNDROW and/or her co-conspirators
9 registered with the state of Colorado a business entity using a name formed by using
10 N.Z.'s surname, followed by "Management," and listed N.Z. as its registered agent.
11 AMBER TOWNDROW, posing as N.Z., opened a JPMC business account for the
12 business entity and received a debit card. AMBER TOWNDROW and/or her co-
13 conspirators transferred approximately \$84,644 from N.Z.'s personal account to the
14 fraudulent business account. AMBER TOWNDROW then used the business debit card to
15 purchase approximately 60 USPS money orders totaling approximately \$59,872.
16 AMBER TOWNDROW also used the business debit card to make point of sale purchases
17 at Louis Vuitton, an Apple store, and two Walmart stores.

18 18. AMBER TOWNDROW maintained the personal identifying information of
19 her victims in handwritten ledgers and on electronic devices.

20 19. AMBER TOWNDROW also memorized the personal identifying
21 information of her victims to further her scheme. For example, on September 4, 2022,
22 AMBER TOWNDROW was contacted by law enforcement during a traffic stop in
23 Indiana. AMBER TOWNDROW provided a false driver's license containing the personal
24 identification of a real person from the State of Virginia but containing AMBER
25 TOWNDROW's photograph. When law enforcement asked AMBER TOWNDROW for
26 her Social Security Number, she provided this victim's true SSN from memory.

TOWNDROW and DARBY CANFIELD knowingly conducted and caused to be conducted the transactions set forth below, with each transaction constituting a separate Count of this Indictment. Each of the following offenses was committed in furtherance of, and was a foreseeable part of, the conspiracy charged in Count 1 of this Indictment:

COUNT	DATE	FINANCIAL INSTITUTION	TRANSACTION
2	1/27/2022	JPMC	Purchase of USPS money orders totaling approximately \$9,975 using a fraudulently obtained JPMC debit card issued under K.S.'s identity, at the Seafirst Post Office in Seattle
3	1/27/2022	JPMC	Purchase of USPS money orders, totaling approximately \$9,970 using a fraudulently obtained JPMC debit card under K.S.'s identity, at the Broadway Post Office in Seattle
4	1/28/2022	JPMC	Purchase of USPS money orders, totaling approximately \$9,970 using a fraudulently obtained JPMC debit card under K.S.'s identity, at the Broadway post office in Seattle
5	2/11/2022	JPMC	Purchase of MoneyGram money orders, totaling approximately \$5,000 using a fraudulently obtained JPMC debit card under the A.C.B.'s identity, at a Walmart in Renton
6	2/11/2022	JPMC	Purchase of USPS money orders, totaling \$9,800 using a fraudulently obtained JPMC debit card under A.C.B.'s identity, at a Post Office in Tukwila
7	2/11/2022	JPMC	Purchase of USPS money orders, totaling \$9,970 using a fraudulently obtained JPMC debit card under A.C.B.'s identity, at a Post Office in Des Moines, Washington
8	2/14/2022	JPMC	Purchase of USPS money orders, totaling \$9,875 using a fraudulently obtained JP Morgan Chase debit card under A.C.B.'s identity, at the Columbia post office in Seattle

All in violation of Title 18, United States Code, Section 1344, and Section 2.

COUNTS 9 – 11

(Aggravated Identity Theft)

26. The Grand Jury incorporates paragraphs 1 - 25 of this indictment as if fully alleged herein.

27. On or about the below listed dates, in the King County, in the Western District of Washington, and elsewhere, AMBER TOWNDROW and DARBY

CANFIELD did knowingly use, without lawful authority, the means of identification of the victims specified below, who are real persons, during and in relation to a felony violation enumerated in Title 18, United States Code, Section 1028A(c), to wit Conspiracy to Commit Bank Fraud in violation of Title 18, United States Code, Section 1349, and Bank Fraud in violation of Title 18, United States Code, Section 1344, knowing that the means of identification belonged to another actual person. Each of the following offenses was committed in furtherance of, and was a foreseeable part of, the conspiracy charged in Count 1 of this Indictment.

COUNT	DATE	MEANS OF IDENTIFICATION
9	1/27/2022	Purchase of money orders using first and last name of K.S.
10	2/11/2022	Purchase of money orders using the first and last name and date of birth of A.C.B.
11	02/18/2022	Cashing of money orders using the first and last name and unique MoneyTree identification card of J.V.

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

COUNTS 12 - 14

(Money Laundering)

28. The Grand Jury incorporates by reference paragraphs 1 - 27 of this Indictment as if fully set forth herein.

29. On or about the dates set forth below, in the Western District of Washington, and elsewhere, DARBY CANFIELD and AMBER TOWNDROW did knowingly conduct and attempt to conduct financial transactions affecting interstate and foreign commerce which involved the proceeds of a specified unlawful activity, that is, Conspiracy to Commit Bank Fraud, in violation of Title 18, United States Code, Section 1349, and Bank Fraud, in violation of Title 18, United States Code, Section 1343, knowing the transactions were designed in whole and in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of said specified unlawful

activity, and knowing that the property involved in the financial transactions represented the proceeds of some form of unlawful activity. Each of the following offenses was committed in furtherance of, and was a foreseeable part of, the conspiracy charged in

Count 1 of this Indictment:

Count	Date	Monetary Transaction
12	01/31/2022	Presentation of \$1,000 money order ending in 3203, payable to J.V., in exchange for cash, at a MoneyTree location in Seattle.
13	02/07/2022	Presentation of \$975 money order ending in 3708, payable to J.V., in exchange for cash, at a MoneyTree location in Seattle.
14	02/18/2022	Presentation of a \$1,000 money order ending in 8613, payable to J.V., in exchange for cash, at a MoneyTree location in Renton.

All in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i), and Section 2.

FORFEITURE ALLEGATION

The allegations contained in Counts 1-14 above are hereby realleged and incorporated by reference for the purpose of alleging forfeiture.

Upon conviction of any of the offenses alleged in Counts 1-8, AMBER TOWNDROW and DARBY CANFIELD shall forfeit to the United States any property constituting, or derived from, proceeds Defendant obtained directly or indirectly, as a result of the offense. All such property is forfeitable pursuant to Title 18, United States Code, Section 982(a)(2), and includes but is not limited to a sum of money reflecting the proceeds the Defendant obtained as result of the offense.

Upon conviction of any of the offenses alleged in Counts 12-14, AMBER TOWNDROW and DARBY CANFIELD shall forfeit to the United States any property involved in such offense, or any property traceable to such property. All such property is forfeitable pursuant to Title 18, United States Code, Section 982(a)(1), and includes but is not limited to a sum of money reflecting the proceeds the Defendant obtained as result of the offense.

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1 **Substitute Assets.** If any of the above-described forfeitable property, as a result of
2 any act or omission of the defendant,

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

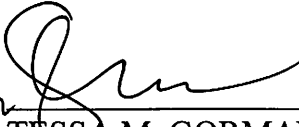
9 it is the intent of the United States to seek the forfeiture of any other property of the
10 defendant, up to the value of the above-described forfeitable property, pursuant to
11 Title 21, United States Code, Section 853(p).

12
13 A TRUE BILL:

14 DATED:

15 *Signature of Foreperson redacted pursuant*
16 *to the policy of the Judicial Conference of*
17 *the United States.*

18 _____
19 FOREPERSON

18 
19 _____
20 TESSA M. GORMAN
21 United States Attorney

21 
22 _____
23 BETH WILKINSON
24 Assistant United States Attorney

24 
25 _____
26 SEAN H. WAITE
27 Assistant United States Attorney