

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

UNITED STATES OF AMERICA

v.

**NEKIA ISHAWN HUNTER,
LAVON CALDWELL,
a/k/a JAMAL GARRISON,
FAYE MARIE JONES,
Defendants.**

*** CRIMINAL NO. _____**

*** (Conspiracy to Commit Bank Fraud,**

*** 18 U.S.C. § 1349; Aggravated Identity**

*** Theft, 18 U.S.C. § 1028A(a)(1); and**

*** Aiding and Abetting, 18 U.S.C. § 2)**

INDICTMENT

COUNT ONE

The Grand Jury for the District of Maryland charges that:

Introduction

At all times relevant to this Indictment:

1. Defendant **NEKIA ISHAWN HUNTER (NEKIA HUNTER)** was a Maryland resident living in Baltimore, Maryland.

2. Defendant **LAVON CALDWELL, a/k/a/ JAMAL GARRISON,** was a Maryland resident living in Baltimore, Maryland. **CALDWELL** was employed by Brown's Memorial Baptist Church and Shelter.

3. Defendant **FAYE JONES** was a Maryland resident and was the mother of **NEKIA HUNTER.**

The Victim Financial Institutions

4. Bloomingdale's was a retail department store with locations throughout the United States. Bloomingdale's offered its customers credit accounts to make consumer purchases through FDS Bank, located in Ohio, which was a financial institution as defined by 18 U.S.C. § 20.

5. Macy's, Best Buy, and Comp USA were retail stores with locations throughout the United States. Macy's, Best Buy, and Comp USA offered their customers credit accounts to make consumer purchases through HSBC Bank, located in Delaware, which was a financial institution as defined by 18 U.S.C. § 20.

6. Wal-Mart was a retail superstore with locations throughout the United States. Wal-Mart offered its customers credit accounts to make consumer purchases through GEMB Bank, located in Ohio, which was a financial institution as defined by 18 U.S.C. § 20.

7. The Home Depot, Sears, and RadioShack were retail stores with locations throughout the United States. The Home Depot, Sears, and RadioShack offered their customers credit accounts to make consumer purchases through Citicorp, located in Maryland, which was a financial institution as defined by 18 U.S.C. § 20.

8. Lowe's was a retail store with locations throughout the United States. Lowe's offered its customers credit accounts to make consumer purchases through GE Money Bank, located in Ohio, which was a financial institution as defined by 18 U.S.C. § 20.

9. Costco was a warehouse discount store with locations throughout the United States. Costco offered its customers credit accounts to make consumer purchases through

American Express, located in New Jersey, which was a financial institution as defined by 18 U.S.C. § 20.

10. Nordstrom was a retail department store with locations throughout the United States. Nordstrom offered its customers credit accounts to make consumer purchases through Nordstrom Bank, located in Colorado, which was a financial institution as defined by 18 U.S.C. § 20.

11. Circuit City was a retail store specializing in the sale of electronics with locations throughout the United States. Circuit City offered its customers credit accounts to make consumer purchases through Chase Bank, located in Georgia, which was a financial institution as defined by 18 U.S.C. § 20.

12. First Mariner Bank was a retail bank establishment with locations throughout Maryland. The deposits of First Mariner Bank were insured by the Federal Deposit Insurance Corporation and was, thus, a financial institution as defined by 18 U.S.C. § 20.

13. Wells Fargo provided loans for customers of Musselman's Dodge and Fox Chevrolet, automobile dealerships located in the Baltimore area, to finance automobile purchases. The deposits of Wells Fargo were insured by the Federal Deposit Insurance Corporation and was, thus, a financial institution as defined by 18 U.S.C. § 20.

14. BMW Financial Services provided loans for customers of Russell BMW, an automobile dealership in Baltimore, Maryland, to finance automobile purchases. BMW Financial Services was a financial institution as defined by 18 U.S.C. § 20.

15. From on or about August 12, 2006 through on or about December 16, 2006, in the District of Maryland and elsewhere,

**NEKIA ISHAWN HUNTER,
LAVON CALDWELL, a/k/a JAMAL GARRISON,
and
FAYE JONES**

defendants herein, did knowingly and intentionally combine, conspire, confederate and agree together and with other persons, both known and unknown to the Grand Jury, to execute and attempt to execute a scheme and artifice to defraud financial institutions and to obtain money and property from financial institutions by means of material false and fraudulent pretenses, representations, and promises, in violation of 18 U.S.C. § 1344.

OBJECT OF THE CONSPIRACY

16. It was the object of the conspiracy to use the names, social security numbers, and other personal identifying information of various individual victims, without their knowledge and consent, to obtain credit accounts and to compromise existing credit accounts in the individual victims' names to purchase consumer goods for the conspirators' own use without intending to pay for them, thereby obtaining money and property from, and causing a loss to, the victim financial institutions.

MANNER AND MEANS OF THE CONSPIRACY

17. It was part of the conspiracy that **NEKIA HUNTER** obtained stolen credit reports from a mortgage company located in Baltimore, Maryland, containing the names, social security numbers, credit score, and other personal identification information of persons who had applied for a mortgage loan.

18. It was further part of the conspiracy that **NEKIA HUNTER** produced fraudulent driver's licenses in the names of the individuals on the credit reports.

19. It was further part of the conspiracy that **NEKIA HUNTER** placed photographs of her co-conspirators on the fraudulent driver's licenses to enable the co-conspirators to assume the identity of the individual victims and to assist them in procuring, compromising, and using the credit accounts of others at various financial institutions.

20. It was further part of the conspiracy that **NEKIA HUNTER, LAVON CALDWELL, and FAYE JONES**, and others, used the fraudulent driver's license, the name, and other personal identifying information of the individual victims' at various retail stores to apply for and obtain credit accounts through the various financial institutions that offered credit accounts to the retail stores' customers.

21. It was further part of the conspiracy that **NEKIA HUNTER, LAVON CALDWELL, FAYE JONES**, and others, selected goods for purchase at various retail stores and then used the credit accounts in the individual victims' names to purchase the goods.

22. It was further part of the conspiracy that **NEKIA HUNTER, LAVON CALDWELL, FAYE JONES**, and others, would accompany one another to the retail stores to assist in loading the purchased goods, act as look-outs, and to drive a truck to transport the purchased goods.

23. It was further part of the conspiracy that **NEKIA HUNTER, LAVON CALDWELL, FAYE JONES**, and others, sold the purchased goods for cash and split the proceeds.

OVERT ACTS

24. In furtherance of the conspiracy and to effect its objects, **NEKIA HUNTER, LAVON CALDWELL, FAYE JONES** and other coconspirators committed at least one of the following overt acts in the District of Maryland:

Individual Victim "RH"

a. On or about August 12, 2006, **NEKIA HUNTER** produced a false Maryland driver's license in the name of "RH," bearing a photograph of **LAVON CALDWELL**, and gave the fraudulent driver's license and the personal identification information of "RH" to **CALDWELL** for the purpose of obtaining credit and purchasing consumer goods.

b. From on or about August 12, 2006, through on or about August 20, 2006, **LAVON CALDWELL** used the name "RH" and other personal identifying information of "RH" to fraudulently procure credit accounts from various financial institutions and made purchases totaling at least \$21,000 using those credit accounts.

c. On or about August 19, 2006, **LAVON CALDWELL** purchased \$4,054.05 in Movado watches from the Macy's in Columbia, Maryland using a fraudulently opened credit account with HSBC Bank in the name of "RH."

Individual Victim "GP"

d. On or about August 17, 2006, **NEKIA HUNTER** produced a false Maryland driver's license in the name of "GP," bearing a photograph of **LAVON CALDWELL**, and gave the fraudulent driver's license and the personal identification information of "GP" to **CALDWELL** for the purpose of obtaining credit and purchasing consumer goods.

e. From on or about August 17, 2006, through on or about August 22, 2006, **LAVON CALDWELL** used the name “GP” and other personal identifying information of “GP” to fraudulently procure credit accounts from various financial institutions and made purchases totaling at least \$83,000 using those credit accounts.

f. On or about August 17, 2006, **LAVON CALDWELL** fraudulently obtained a loan in the amount of \$40,544.60 from Wells Fargo in the name of “GP” and financed the purchase of a 2004 Mercedes Benz E320 from Musselman’s Dodge in Baltimore, Maryland.

g. On or about August 22, 2006, **LAVON CALDWELL** fraudulently obtained a loan in the amount of \$42,855.60 from Wells Fargo in the name of “GP” and financed the purchase of a 2002 BMW from Fox Chevrolet in Baltimore, Maryland.

Individual Victim “KH”

h. On or about September 11, 2006, **NEKIA HUNTER** produced a false Maryland driver’s license in the name of “KH,” bearing a photograph of **LAVON CALDWELL**, and gave the fraudulent driver’s license and the personal identification information of “KH” to **CALDWELL** for the purpose of obtaining credit and purchasing consumer goods.

i. On or about September 11, 2006, **LAVON CALDWELL** fraudulently obtained a loan in the amount of \$91,964.60 from BMW Financial Services and used it to finance the purchase or lease of a 2006 BMW 650C Russell BMW in Baltimore, Maryland.

j. On or about September 15, 2006, **LAVON CALDWELL** used the personal identifying information of “KH” and withdrew \$3,500 from “KH’s” bank account at the First Mariner Bank in Baltimore, Maryland.

Individual Victim "HM"

k. On or about September 25, 2006, **NEKIA HUNTER** produced a false Maryland driver's license in the name of "HM," bearing a photograph of **LAVON CALDWELL**, and gave the fraudulent driver's license and the personal identification information of "HM" to **CALDWELL** for the purpose of obtaining credit and purchasing consumer goods.

l. From on or about September 25, 2006, through on or about September 26, 2006, **LAVON CALDWELL** used the name "HM" and other personal identifying information of "HM" to fraudulently procure credit accounts from various financial institutions and made purchases totaling at least \$15,000 using those credit accounts.

m. On or about September 25, 2006, **CALDWELL** purchased \$3,139.44 in consumer goods from the Sears in Bethesda, Maryland using a fraudulently opened credit account with Citicorp in the name of "HM."

Individual Victim "TB"

n. On or about September 27, 2006, **NEKIA HUNTER** produced a false Maryland driver's license in the name of "TB," bearing a photograph of **LAVON CALDWELL**, and gave the fraudulent driver's license and the personal identification information of "TB" to **CALDWELL** for the purpose of obtaining credit and purchasing consumer goods.

o. From on or about September 27, 2006, through on or about October 25, 2006, **LAVON CALDWELL** used the name "TB" and other personal identifying information of "TB" to fraudulently procure credit accounts from various financial institutions and made purchases totaling at least \$43,000 using those credit accounts.

p. On or about October 2, 2006, **LAVON CALDWELL** purchased \$6,412.35 of consumer goods from the Macy's in Columbia, Maryland using a fraudulently opened credit account with HSBC Bank in the name of "TB."

Individual Victim "JH"

q. On or about September 18, 2006, **NEKIA HUNTER** produced a false Maryland driver's license in the name of "JH," bearing a photograph of co-conspirator **Christopher Carson**, and gave the fraudulent driver's license and the personal identification information of "JH" to **Christopher Carson** for the purpose of obtaining credit and purchasing consumer goods.

r. From on or about September 18, 2006, through on or about September 21, 2006, co-conspirator **Christopher Carson** used the name "JH" and other personal identifying information of "JH" to fraudulently procure credit accounts at various financial institutions and made purchases totaling at least \$11,000 using those credit accounts.

s. On or about September 18, 2006, co-conspirator **Christopher Carson** purchased \$4,300.16 in consumer goods at the Home Depot in Annapolis, Maryland using the fraudulently opened credit account at Citicorp in the name of "JH."

Individual Victim "PP"

t. On or about September 27, 2006, **NEKIA HUNTER** produced a false Maryland driver's license in the name of "PP," bearing a photograph of **Christopher Carson**, and gave the fraudulent driver's license and the personal identification information of "PP" to co-conspirator **Christopher Carson** for the purpose of obtaining credit and purchasing consumer goods.

u. From on or about September 27, 2006, through on or about October 1, 2006, co-conspirator **Christopher Carson** used the name “PP” and other personal identifying information of “PP” to fraudulently procure credit accounts at various financial institutions and made purchases totaling at least \$37,000 using those credit accounts.

v. On or about September 29, 2006, co-conspirator **Christopher Carson** purchased \$5,858.98 in consumer goods from the Circuit City in Marlow Heights, Maryland using the fraudulently opened credit account at Chase Bank in the name of “PP.”

Individual Victim “RC”

w. On or about October 28, 2006, **NEKIA HUNTER** produced a false Maryland driver’s license in the name of “RC,” bearing a photograph of **LAVON CALDWELL**, and gave the fraudulent driver’s license and the personal identification information of “RC” to **CALDWELL** for the purpose of obtaining credit and purchasing consumer goods.

x. From on or about October 28, 2006, through on or about November 4, 2006, **LAVON CALDWELL** used the name “RC” and other personal identifying information of “RC” to fraudulently procure credit accounts various financial institutions and made purchases totaling at least \$54,000 using those credit accounts.

y. On or about November 4, 2006, **LAVON CALDWELL** purchased \$1,682.00 in consumer goods from the Nordstrom in Columbia, Maryland using a fraudulently opened credit account with Nordstrom Bank in the name of “RC.”

Individual Victim “MG”

z. On or about October 22, 2006, **NEKIA HUNTER** produced a false Maryland driver’s license in the name of “MG,” bearing a photograph of co-conspirator **Sherrel Peters**,

and gave the fraudulent driver's license and the personal identification information of "MG" to co-conspirator **Sherrel Peters** for the purpose of obtaining credit and purchasing consumer goods.

aa. From on or about October 22, 2006, through on or about November 4, 2006, co-conspirator **Sherrel Peters** and others used the name "MG" and other personal identifying information of "MG" to fraudulently procure credit accounts at various financial institutions and made purchases totaling at least \$28,000 using those credit accounts.

bb. On or about October 26, 2006, co-conspirator **Sherrel Peters** purchased \$4,885.00 in consumer goods from the Sears in Bel Air, Maryland using the fraudulently opened credit account with Citicorp in the name "MG."

Individual Victim "OM"

cc. On or about November 14, 2006, **NEKIA HUNTER** produced a false Maryland driver's license in the name of "OM," bearing a photograph of **LAVON CALDWELL**, and gave the fraudulent driver's license and the personal identification information of "OM" to **CALDWELL** for the purpose of obtaining credit and purchasing consumer goods.

dd. From on or about November 14, 2006, through on or about November 21, 2006, **LAVON CALDWELL** used the name "OM" and other personal identifying information of "OM" to fraudulently procure credit accounts from various financial institutions and made purchases totaling at least \$12,000 using those credit accounts.

ee. On or about November 17, 2006, **LAVON CALDWELL** purchased \$2,792.88 in consumer goods from the Circuit City in Baltimore, Maryland using a fraudulently opened credit account with Chase Bank in the name of "OM."

Individual Victim "PC"

ff. On or about November 18, 2006, **NEKIA HUNTER** produced a false Maryland driver's license in the name of "PC," bearing a photograph of **FAYE JONES**, and gave the fraudulent driver's license and the personal identification information of "PC" to **JONES** for the purpose of obtaining credit and purchasing consumer goods.

gg. From on or about November 18, 2006, through on or about November 21, 2006, **FAYE JONES** used the name "PC" and other personal identifying information of "PC" to fraudulently procure credit accounts from various financial institutions and made purchases totaling at least \$6,000 using those credit accounts.

hh. On or about November 21, 2006, **FAYE JONES** purchased \$4,302.71 in consumer goods from the Sears in Bel Air, Maryland using a fraudulently opened credit account with Citicorp in the name of "PC."

Individual Victim "JB"

ii. On or about November 26, 2006, **NEKIA HUNTER** produced a false Maryland driver's license in the name of "JB," bearing a photograph of **LAVON CALDWELL**, and gave the fraudulent driver's license and the personal identification information of "JB" to **CALDWELL** for the purpose of obtaining credit and purchasing consumer goods.

jj. On or about November 26, 2006, **LAVON CALDWELL** purchased \$6,908.88 in consumer goods from the Circuit City in Timonium, Maryland using a fraudulently opened credit account with Chase Bank in the name of "JB."

kk. On or about November 26, 2006, **LAVON CALDWELL** purchased \$3,879.65 in consumer goods from the Nordstrom in Bethesda, Maryland using a fraudulently opened credit account with Nordstrom Bank in the name of "JB."

Individual Victim “DB”

ll. On or about December 10, 2006, **NEKIA HUNTER** produced a false Maryland driver’s license in the name of “DB,” bearing a photograph of **FAYE JONES**, and gave the fraudulent driver’s license and the personal identification information of “DB” to **JONES** for the purpose of obtaining credit and purchasing consumer goods.

mm. From on or about December 10, 2006, through on or about December 16, 2006, **FAYE JONES** used the name “DB” and other personal identifying information of “DB” to fraudulently procure credit accounts with various financial institutions and made purchases totaling at least \$4,700 using those credit accounts.

nn. On or about December 16, 2006, **FAYE JONES** purchased \$3,727.48 in consumer goods from the Circuit City in Marlow Heights, Maryland using a fraudulently opened credit account with Chase Bank in the name of “DB.”

18 U.S.C. § 1349

COUNT TWO

The Grand Jury for the District of Maryland further charges that:

1. The allegations set forth in paragraphs 1 through 14, 16 through 23, and 24a through 24c of Count One of this Indictment are incorporated here.

2. On or about August 19, 2006, in the District of Maryland,

**NEKIA ISHAWN HUNTER,
and
LAVON CALDWELL, a/k/a JAMAL GARRISON,**

the defendants herein, did knowingly possess and use, without lawful authority, a means of identification of another person; to wit, the name and social security number of "RH," during and in relation to a felony violation enumerated in 18 U.S.C. § 1028A(c), that is, the conspiracy to commit bank fraud under 18 U.S.C. § 1349 as alleged in Count One of this Indictment.

18 U.S.C. § 1028A(a)(1)

18 U.S.C. § 2

COUNT THREE

The Grand Jury for the District of Maryland further charges that:

1. The allegations set forth in paragraphs 1 through 14, 16 through 23, and 24d through 24g of Count One of this Indictment are incorporated here.
2. On or about August 17, 2006, in the District of Maryland,

**NEKIA ISHAWN HUNTER,
and
LAVON CALDWELL, a/k/a JAMAL GARRISON,**

the defendants herein, did knowingly possess and use, without lawful authority, a means of identification of another person; to wit, the name and social security number of “GP,” during and in relation to a felony violation enumerated in 18 U.S.C. § 1028A(c), that is, the conspiracy to commit bank fraud under 18 U.S.C. § 1349 as alleged in Count One of this Indictment.

18 U.S.C. § 1028A(a)(1)
18 U.S.C. § 2

COUNT FOUR

The Grand Jury for the District of Maryland further charges that:

1. The allegations set forth in paragraphs 1 through 14, 16 through 23, and 24h through 24j of Count One of this Indictment are incorporated here.

2. On or about September 11, 2006, in the District of Maryland,

**NEKIA ISHAWN HUNTER,
and
LAVON CALDWELL, a/k/a JAMAL GARRISON,,**

the defendants herein, did knowingly possess and use, without lawful authority, a means of identification of another person; to wit, the name and social security number of “KH,” during and in relation to a felony violation enumerated in 18 U.S.C. § 1028A(c), that is, the conspiracy to commit bank fraud under 18 U.S.C. § 1349 as alleged in Count One of this Indictment.

18 U.S.C. § 1028A(a)(1)
18 U.S.C. § 2

COUNT FIVE

The Grand Jury for the District of Maryland further charges that:

1. The allegations set forth in paragraphs 1 through 14, 16 through 23 and 24k through 24m of Count One of this Indictment are incorporated here.

2. On or about September 25, 2006, in the District of Maryland,

**NEKIA ISHAWN HUNTER,
and
LAVON CALDWELL, a/k/a JAMAL GARRISON,**

the defendants herein, did knowingly possess and use, without lawful authority, a means of identification of another person; to wit, the name and social security number of “HM,” during and in relation to a felony violation enumerated in 18 U.S.C. § 1028A(c), that is, the conspiracy to commit bank fraud under 18 U.S.C. § 1349 as alleged in Count One of this Indictment.

18 U.S.C. § 1028A(a)(1)

18 U.S.C. § 2

COUNT SIX

The Grand Jury for the District of Maryland further charges that:

1. The allegations set forth in paragraphs 1 through 14, 16 through 23 and 24n through 24p of Count One of this Indictment are incorporated here.
2. On or about October 2, 2006, in the District of Maryland,

**NEKIA ISHAWN HUNTER,
and
LAVON CALDWELL, a/k/a JAMAL GARRISON,**

the defendants herein, did knowingly possess and use, without lawful authority, a means of identification of another person; to wit, the name and social security number of "TB," during and in relation to a felony violation enumerated in 18 U.S.C. § 1028A(c), that is, the conspiracy to commit bank fraud under 18 U.S.C. § 1349 as alleged in Count One of this Indictment.

18 U.S.C. § 1028A(a)(1)
18 U.S.C. § 2

COUNT SEVEN

The Grand Jury for the District of Maryland further charges that:

1. The allegations set forth in paragraphs 1 through 14, 16 through 23 and 24w through 24y of Count One of this Indictment are incorporated here.
2. On or about November 4, 2006, in the District of Maryland,

**NEKIA ISHAWN HUNTER,
and
LAVON CALDWELL, a/k/a JAMAL GARRISON,**

the defendants herein, did knowingly possess and use, without lawful authority, a means of identification of another person; to wit, the name and social security number of "RC," during and in relation to a felony violation enumerated in 18 U.S.C. § 1028A(c), that is, the conspiracy to commit bank fraud under 18 U.S.C. § 1349 as alleged in Count One of this Indictment.

18 U.S.C. § 1028A(a)(1)
18 U.S.C. § 2

COUNT EIGHT

The Grand Jury for the District of Maryland further charges that:

1. The allegations set forth in paragraphs 1 through 14, 16 through 23, and 24cc through 24ee of Count One of this Indictment are incorporated here.

2. On or about November 17, 2006, in the District of Maryland,

**NEKIA ISHAWN HUNTER,
and
LAVON CALDWELL, a/k/a JAMAL GARRISON,**

the defendants herein, did knowingly possess and use, without lawful authority, a means of identification of another person; to wit, the name and social security number of “OM,” during and in relation to a felony violation enumerated in 18 U.S.C. § 1028A(c), that is, the conspiracy to commit bank fraud under 18 U.S.C. § 1349 as alleged in Count One of this Indictment.

18 U.S.C. § 1028A(a)(1)

18 U.S.C. § 2

COUNT NINE

The Grand Jury for the District of Maryland further charges that:

1. The allegations set forth in paragraphs 1 through 14, 16 through 23 and 24ii through 24kk of Count One of this Indictment are incorporated here.
2. On or about November 26, 2006, in the District of Maryland,

**NEKIA ISHAWN HUNTER,
and
LAVON CALDWELL, a/k/a JAMAL GARRISON,**

the defendants herein, did knowingly possess and use, without lawful authority, a means of identification of another person; to wit, the name and social security number of “JB,” during and in relation to a felony violation enumerated in 18 U.S.C. § 1028A(c), that is, the conspiracy to commit bank fraud under 18 U.S.C. § 1349 as alleged in Count One of this Indictment.

18 U.S.C. § 1028A(a)(1)
18 U.S.C. § 2

COUNT TEN

The Grand Jury for the District of Maryland further charges that:

1. The allegations set forth in paragraphs 1 through 14, 16 through 23 and 24ff through 24hh of Count One of this Indictment are incorporated here.
2. Between on or about November 21, 2006, in the District of Maryland,

**NEKIA ISHAWN HUNTER,
and
FAYE MARIE JONES,**

the defendants herein, did knowingly possess and use, without lawful authority, a means of identification of another person; to wit, the name and social security number of "PC," during and in relation to a felony violation enumerated in 18 U.S.C. § 1028A(c), that is, the conspiracy to commit bank fraud under 18 U.S.C. § 1349 as alleged in Count One of this Indictment.

18 U.S.C. § 1028A(a)(1)
18 U.S.C. § 2

COUNT ELEVEN

The Grand Jury for the District of Maryland further charges that:

1. The allegations set forth in paragraphs 1 through 14, 16 through 23 and 24 through 24nn of Count One of this Indictment are incorporated here.
2. On or about December 16, 2006, in the District of Maryland,

**NEKIA ISHAWN HUNTER,
and
FAYE MARIE JONES,**

the defendants herein, did knowingly possess and use, without lawful authority, a means of identification of another person; to wit, the name and social security number of “DB,” during and in relation to a felony violation enumerated in 18 U.S.C. § 1028A(c), that is, the conspiracy to commit bank fraud under 18 U.S.C. § 1349 as alleged in Count One of this Indictment.

18 U.S.C. § 1028A(a)(1)
18 U.S.C. § 2

A TRUE BILL:

Rod J. Rosenstein
United States Attorney

Foreperson

Dated: