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April 23, 2009 3:45 PM

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U.S. DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
BY: _gf___/_____

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

No. 1:09-CR-45

Plaintiff,

vs.

Hon. Robert J. Jonker
United States District Judge

ALONZO LAMAR HOLLOWAY,
KAMILLAH RASHEDA BROWN,
SHAWNCY JOANNE MCGOWAN,
KIRK JEROME USHER,
KEVIN ERWIN,
MARK ALLEN SAMUELS,
DONEISHA LANEE BRUCE,
CYNTHIA DENISE WILLIAMS,
TRAYSHUN ANNETTE LEONARD,
DALE LOUISE WILSON,
WILLIE JESUS LEBLANC,
LAQUIDA BRESHUIN PRATT,
MOCHA MYESHA ALDRIDGE, and
ALAIYA MINYONNE KENNARD,

Defendants.

SECOND SUPERSEDING INDICTMENT

_____ /

The Grand Jury charges:

COUNT 1
(Conspiracy)

Beginning on a date not later than May 31, 2007, and continuing until January 9, 2009, in Grand Rapids, Kent County, in the Southern Division of the Western District of Michigan, and elsewhere, the Defendants,

ALONZO LAMAR HOLLOWAY,
KAMILLAH RASHEDA BROWN,

SHAWNCY JOANNE MCGOWAN,
KIRK JEROME USHER,
KEVIN ERWIN,
MARK ALLEN SAMUELS,
DONEISHA LANE BRUCE,
CYNTHIA DENISE WILLIAMS,
TRAYSHUN ANNETTE LEONARD,
DALE LOUISE WILSON,
WILLIE JESUS LEBLANC,
LAQUIDA BRESHUIN PRATT,
MOCHA MYESHA ALDRIDGE, and
ALAIYA MINYONNE KENNARD,

did unlawfully, willfully and knowingly conspire, confederate and agree among themselves, and with persons known and unknown to the Grand Jury, to commit one or more of the following offenses against the United States:

(a) to knowingly use, without lawful authority and in or affecting interstate or foreign commerce, one or more means of identification of other persons with intent to commit, to aid or abet, or in connection with, the commission of unlawful activity that constituted violations of Federal law, to wit, wire fraud and bank fraud in violation of Title 18, United States Code, Sections 1343 and 1344, in violation of Title 18, United States Code, Section 1028(a)(7);

(b) having devised a scheme to defraud, and for the purpose of executing such scheme, to transmit or cause to be transmitted by means of wire communication in interstate or foreign commerce writings, signs, signals, pictures, or sounds, in violation of Title 18, United States Code, Section 1343; and

(c) to knowingly and with intent to defraud, execute a scheme or artifice to

defraud the Bank of America, a bank whose deposits were then insured by the Federal Deposit Insurance Corporation, in violation of Title 18, United States Code, Section 1344.

OBJECT OF THE CONSPIRACY

The object of the conspiracy was for Defendants to unlawfully enrich themselves at the expense of other persons and financial institutions. Specifically, the Defendants intended to unlawfully acquire means of identification and account information of actual Bank of America account holders from sources that included, but were not limited to, Bank of America employee Mocha Myesha Aldridge; to use those means of identification in the production of fraudulent identification documents in the names of those account holders; and to then travel to Bank of America branches throughout the United States, using those documents to make fraudulent in-person cash withdrawals from the Bank of America accounts of those persons.

OVERT ACTS

To effect the object of the conspiracy, at least one of the following overt acts was committed in the Western District of Michigan by a member of the conspiracy:

1. On or about May 31, 2007, Alonzo Lamar Holloway, Shawncy Joanne McGowan, and other persons known to the Grand Jury traveled by commercial air carrier from Oakland, California to Houston, Texas, where, using false identification documents, they made, and attempted to make, fraudulent cash withdrawals at numerous Bank of America branches from the accounts of actual Bank of America

account holders before returning to Oakland, California.

2. Between on or about August 4, 2007 and August 10, 2007, Alonzo Lamar Holloway, Shawncy Joanne McGowan, Kevin Erwin, and Alaiya Minyonne Kennard traveled by commercial air carrier from Oakland, California to Orlando, Florida, where, using false identification documents, they made, and attempted to make, fraudulent cash withdrawals at numerous Bank of America branches from the accounts of actual Bank of America account holders, including, but not limited to, the following three withdrawals made by Alaiya Kennard: \$3800 on August 10 in Orlando, Florida; \$2500 on August 13 in Kissimmee, Florida; and \$2800 on August 10 in Tampa, Florida; before returning to Oakland, California.

3. On several occasions during September 2007 in Oakland, California, Mocha Myesha Aldridge, who was then an employee of Bank of America working at the Concord call-center in Oakland, used her Bank of America computer to access account and personal information about a specific Bank of America depositor. She then provided that information to Kevin Erwin, knowing that he would use it to produce false identification documents in the depositor's name for the purpose of using those documents to make fraudulent cash withdrawals from that depositor's account. Erwin then produced the documents, which bore the likeness of Laquida Breshuin Pratt, and provided them to Alonzo Lamar Holloway who, along with Shawncy Joanne McGowan and Laquida Pratt, traveled to Kansas City, Missouri, on or about October 17, 2007. There, Laquida Pratt used the documents at Bank of America branches in the Kansas

City, Kansas, and Independence, Missouri areas on October 23 and 24, 2007 to make fraudulent cash withdrawals totaling \$8300 from the depositor's account.

4. On or about June 30, 2008, Alonzo Lamar Holloway, Shawncy Joanne McGowan, Kamillah Rasheda Brown, Willie Jesus LeBlanc, and Kevin Erwin traveled by commercial air carrier from Oakland, California to Providence, Rhode Island, where, using false identification documents, they made and attempted to make fraudulent cash withdrawals at numerous Bank of America branches from the accounts of actual Bank of America account holders.

5. On or about July 3, 2008, Alonzo Lamar Holloway, Shawncy Joanne McGowan, Kamillah Rasheda Brown, and Kevin Erwin traveled, in a vehicle that Alonzo Holloway rented in Providence, Rhode Island, from Providence to Hartford, Connecticut, where they took a commercial air-carrier flight that returned them to Oakland, California.

6. On or about August 18, 2008, Kevin Erwin, Shawncy Joanne McGowan, and Kamillah Rasheda Brown traveled from Oakland, California to Detroit, Michigan, where, traveling in a vehicle rented by Kamillah Brown and using false identification documents, they visited Bank of America branches between August 19 and August 21 making, and attempting to make, fraudulent cash withdrawals from the accounts of actual Bank of America account holders, including, but not limited to, one or more of the following nine withdrawals by Kamillah Brown: \$2500 and \$2750 on August 19 in Grand Rapids, Michigan; \$2500 and \$2750 on August 20 in Grand Rapids, Michigan;

\$4300 on August 20 in Holland, Michigan; \$4600 and \$2950 on August 21 in Kalamazoo, Michigan; and, \$4500 and \$2900 on August 21 in Kalamazoo, Michigan; after which they returned to Oakland, California on a commercial air-carrier flight that departed from Grand Rapids on or about August 21, 2008.

7. On or about September 23, 2008, Dale L. Wilson, Alonzo Lamar Holloway, Shawncy Joanne McGowan, and Kamillah Rasheda Brown traveled from Oakland, California to Detroit, Michigan, where, traveling in a vehicle rented by Kamillah Brown and using false identification documents, they visited area Bank of America branches making, and attempting to make, fraudulent cash withdrawals from the accounts of actual Bank of America account holders, including, but not limited to, one or more of the following four withdrawals made by Dale Wilson: \$4700 on September 23 in Ann Arbor, Michigan; \$4500 on September 24 in Plymouth, Michigan; \$2500 on September 25 in Canton, Michigan; and \$4500 on September 25 in Westland, Michigan.

8. On or about October 14, 2008, Mark Allen Samuels, Dale L. Wilson, Trayshun Annette Leonard, Alonzo Lamar Holloway, Shawncy Joanne McGowan, Kamillah Rasheda Brown, and Kirk Jerome Usher traveled from Oakland, California to Detroit, Michigan, where, traveling in a vehicle rented by Kamillah Brown and using false identification documents, they visited Bank of America branches in Michigan and Illinois between October 15 and October 18 making, and attempting to make, fraudulent cash withdrawals from the accounts of actual Bank of America account holders, including, but not limited to, one or more of the following four withdrawals

made by Trayshun Leonard: \$4500 on October 15 in Flint, Michigan; \$2500 on October 15 in Flint, Michigan; \$5000 on October 16 in Flint, Michigan; and \$7000 on October 16 in Clio, Michigan; one or more of the following three withdrawals made by Shawncy McGowan: \$7500 on October 15 in Grand Blanc, Michigan; \$7500 on October 16 in Saginaw, Michigan; and \$7957.79 on October 17 in Chicago, Illinois; and one or more of the following five withdrawals made by Kamillah Brown: \$2950 and \$4580 on October 16 in Flint, Michigan; \$4580 on October 17 in Chicago, Illinois; and, \$4980 and \$2780 on October 18 in Novi, Michigan; after which they returned to Oakland, California, by commercial air-carrier flights that departed from Detroit on or about October 18, 2008.

9. On or about October 21, 2008, Doneisha Lanee Bruce, Cynthia Denise Williams, Dale Louise Wilson, Trayshun Annette Leonard, Alonzo Lamar Holloway, Shawncy Joanne McGowan, Kamillah Rasheda Brown, Kirk Jerome Usher, Kevin Erwin, and one or more other persons known to the Grand Jury, traveled from Oakland, California to Detroit, Michigan, where, between October 22 and October 24, and using false identification documents, they visited area Bank of America branches making, and attempting to make, fraudulent cash withdrawals from the accounts of actual Bank of America account holders, including, but not limited to, one or more of the following twelve withdrawals made by Doneisha Bruce: \$2500 on October 22 in Rochester Hills, Michigan; \$2700 on October 22 in Rochester Hills, Michigan; \$2800 on October 22 in Bloomfield Township, Michigan; \$1400 on October 22 in Bloomfield Township, Michigan; \$2,300 on October 23 in Roseville, Michigan; \$550 on October 23 in

Roseville, Michigan; \$2500 on October 23 in St. Clair Shores, Michigan; \$2300 on October 23 in St. Clair Shores, Michigan; \$2800 on October 23 in Shelby Township, Michigan; \$2800 on October 23 in Shelby Township, Michigan; \$2500 on October 24 in Rochester Hills, Michigan; and \$2500 on October 24 in Rochester Hills, Michigan.

10. On or about October 29, 2008, in Oakland, California, Mocha Myesha Aldridge, who was then still an employee of Bank of America working at the Concord call-center in Oakland, used her Bank of America computer to access account and personal information about two specific Bank of America depositors. She then provided that information to Kevin Erwin, knowing that he would use it to produce false identification documents in the depositors' names for the purpose of using those documents to make fraudulent cash withdrawals from the accounts. Erwin produced the documents, which bore the likenesses of Kirk Jerome Usher and Kamillah Rasheda Brown, and provided them to Alonzo Lamar Holloway who, along with Shawncy Joanne McGowan, Kirk Jerome Usher, Kamillah Rasheda Brown, and Trayshun Annette Leonard, traveled to Detroit, Michigan on or about November 11, 2008. There, on November 14 and 17, 2008, at Bank of America branches in the Detroit area, Kirk Usher used the documents to make fraudulent cash withdrawals totaling \$9800 from the account of one of those depositors and, between November 12 and 17, 2008, Kamillah Brown used the documents to make fraudulent cash withdrawals totaling \$25,515 from the account of the other depositor.

11. On or about December 2, 2008, Cynthia Denise Williams, Kevin Erwin,

Doneisha Lanee Bruce, Laquida Breshuin Pratt, and one or more other persons known to the Grand Jury, traveled from Oakland, California to Detroit, Michigan, where, between December 3 and December 5, and using false identification documents, they visited area Bank of America branches making, and attempting to make, fraudulent cash withdrawals from the accounts of actual Bank of America account holders, including, but not limited to, the following three withdrawals by Cynthia Williams: \$2000 and \$5000 on December 4 in Detroit, Michigan; and \$5500 on December 4 in Dearborn, Michigan.

12. On or about December 11, 2007, Alonzo Lamar Holloway, Shawncy Joanne McGowan, Laquida Breshuin Pratt, and other persons known to the Grand Jury, traveled from Oakland, California to Albuquerque, New Mexico, where, between December 11 and December 15, and using false identification documents, they visited area Bank of America branches in a vehicle rented by Alonzo Holloway making, and attempting to make, fraudulent cash withdrawals from the accounts of actual Bank of America account holders, including, but not limited to, the following withdrawals by Laquida Pratt: \$2800 on December 11 in Albuquerque; \$3000 on December 14 in Sante Fe; \$1500 on December 14 in Sante Fe; \$2000 on December 15 in Sante Fe; and \$1000 on December 15 in Sante Fe.

13. On or about January 7, 2009, Alonzo Lamar Holloway, Shawncy Joanne McGowan, Kamillah Rasheda Brown, and Kirk Jerome Usher traveled by commercial air carrier from Oakland, California to Detroit, Michigan, where they rented a Nissan

sedan and drove to Holland, Michigan, where Alonzo Holloway rented two rooms for their use at the Comfort Inn.

14. On or about January 8, 2009, in Holland, Michigan, one or more of the group consisting of Alonzo Lamar Holloway, Shawncy Joanne McGowan, Kamillah Rasheda Brown, and Kirk Jerome Usher used a laptop computer, that they had brought with them from California, to access the Internet in order to search for the addresses of Bank of America branches in the area.

15. On or about January 8, 2009, in Holland, Michigan, one or more of the group consisting of Alonzo Lamar Holloway, Shawncy Joanne McGowan, Kamillah Rasheda Brown, and Kirk Jerome Usher used a portable Global Positioning System (GPS) device, that they had brought with them from California, to assist them in locating various Bank of America branches in the area.

16. On or about January 8, 2009, in Holland, Michigan, and Grand Rapids, Michigan, Shawncy Joanne McGowan, Kamillah Rasheda Brown, and Kirk Jerome Usher, using false identification documents, made, and attempted to make, fraudulent cash withdrawals at numerous Bank of America branches from the accounts of actual Bank of America account holders.

17. On or about January 9, 2009, in Wyoming, Grandville, and Grand Rapids, Michigan, Shawncy Joanne McGowan, Kamillah Rasheda Brown, and Kirk Jerome Usher, using false identification documents, made, and attempted to make, fraudulent cash withdrawals at numerous Bank of America branches from the accounts of actual

Bank of America account holders.

18. On or about January 9, 2009, in Wyoming, Michigan, Alonzo Lamar Holloway drove the rented Nissan sedan carrying Shawncy Joanne McGowan, Kamillah Rasheda Brown, and Kirk Jerome Usher away from the Bank of America branch at which Shawncy McGowan had just unsuccessfully attempted to withdraw \$8000 from the account of an actual account holder using false identification documents.

18 U.S.C. § 371

18 U.S.C. § 1349

COUNT 2
(Bank Fraud)

Beginning on a date not later than May 31, 2007, and continuing until January 9, 2009, in the Southern Division of the Western District of Michigan, and elsewhere, the Defendants,

ALONZO LAMAR HOLLOWAY,
KAMILLAH RASHEDA BROWN,
SHAWNCY JOANNE MCGOWAN,
KIRK JEROME USHER,
KEVIN ERWIN,
MARK ALLEN SAMUELS, and
MOCHA MYESHA ALDRIDGE,

and other persons known and unknown to the Grand Jury, knowingly executed, and attempted to execute, a scheme or artifice to defraud the Bank of America, a bank whose deposits were then insured by the Federal Deposit Insurance Corporation.

Specifically, in or near Oakland, California, the Defendants acquired means of identification of actual Bank of America account holders from Mocha Aldridge and one or more others, Kevin Erwin used those means of identification in the production of fraudulent identification documents in the names of those account holders, and then the Defendants, with the exception of Mocha Aldridge, traveled in teams to the Western District of Michigan, and to States other than Michigan, where they used those documents to make and attempt to make fraudulent in-person cash withdrawals of approximately \$677,670.61 at Bank of America branches from the accounts of genuine Bank of America account holders, resulting in a financial loss to the Bank of America of

approximately \$614,417.87.

18 U.S.C. § 1344(1)

18 U.S.C. § 20

18 U.S.C. § 2

COUNT 3
(Wire Fraud)

Beginning on a date not later than May 31, 2007, and continuing until January 9, 2009, in the Southern Division of the Western District of Michigan, and elsewhere, the Defendants,

ALONZO LAMAR HOLLOWAY,
KAMILLAH RASHEDA BROWN,
SHAWNCY JOANNE MCGOWAN,
KIRK JEROME USHER,
KEVIN ERWIN,
MARK ALLEN SAMUELS, and
MOCHA MYESHA ALDRIDGE,

and other persons known and unknown to the Grand Jury, having devised, and for the purpose of executing, a scheme or artifice to defraud, transmitted or caused to be transmitted by means of wire communication in interstate or foreign commerce writings, signs, signals, pictures, or sounds.

Specifically, Defendants used the Internet to determine the addresses of Bank of America branches in geographic areas with which they were unfamiliar and to which they had traveled for the express purpose of committing bank fraud and aggravated identity theft, as alleged in Counts 2 and 4 of this Superseding Indictment; used portable Global Positioning System (GPS) devices to assist them in locating bank branches, locating lodging, and otherwise traveling as necessary to carry out their scheme; and used telephones to access automated teller services of Bank of America in

order to determine the available balances of accounts from which they intended to make fraudulent withdrawals, as well as to call Mocha Aldridge for additional bank account information as necessary during the course of their fraud trips.

18 U.S.C. § 1343

18 U.S.C. § 2

COUNT 4
(Aggravated Identity Theft)

Beginning on a date not later than May 31, 2007, and continuing until January 9, 2009, in the Southern Division of the Western District of Michigan, and elsewhere, the Defendants,

ALONZO LAMAR HOLLOWAY,
KAMILLAH RASHEDA BROWN,
SHAWNCY JOANNE MCGOWAN,
KIRK JEROME USHER,
KEVIN ERWIN,
MARK ALLEN SAMUELS, and
MOCHA MYESHA ALDRIDGE,

and other persons known and unknown to the Grand Jury, did knowingly transfer, possess, and use, without lawful authority, means of identification of other persons, including, but not being limited to Lina Kallay, Erin Hull, Joseph Balagot, Jeffrey Baltz, Lynda Baltz, Melanie Bell-Mayeda, Marisela Claveria, Mario Cortes, Sherrill Sleeter, Douglas Sleeter, Jennie VanderLaag, David Verrecchia, Jinky Burns, Kelley Maresca, Mary Escobar, Priya Sharma, Pat Garrat, and Cathy Goldberg, such means of identification including, but not being limited to, names, social security account numbers, and dates of birth, during and in relation to felony violations of 18 U.S.C. §§ 1343 and 1344, to wit, wire fraud and bank fraud.

Specifically, Kevin Erwin obtained personal identifying information and bank account information from Mocha Aldridge, a Bank of America employee, and from one or more other persons known to the Grand Jury, and then used the names and dates of birth in the production of fraudulent California driver licenses; the Defendants used

those documents to make fraudulent cash withdrawals at Bank of America branches from the accounts of actual Bank of America account holders; and the Defendants used the social security account numbers, and other means of identification, to access Bank of America account information regarding the available balances of accounts from which they intended to make unauthorized withdrawals.

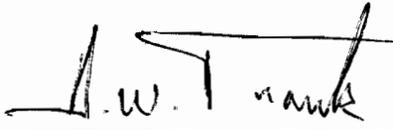
18 U.S.C. § 1028A(a)(1)
18 U.S.C. § 1028A(c)(5)
18 U.S.C. § 1028A(b)
18 U.S.C. § 1028(d)(7)
18 U.S.C. § 2

A TRUE BILL



GRAND JURY FOREPERSON

DONALD A. DAVIS
United States Attorney



HAGEN WALTER FRANK
Assistant United States Attorney