

SECRETED

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

FILED

SEP 19 2002

U. S. DISTRICT COURT
EASTERN DISTRICT OF MO

UNITED STATES OF AMERICA,

Plaintiff,

v.

No.

MICHAEL T. WASHINGTON,

MARTAY LOVE,

HANEEF MAJEED,

JOHN MONTGOMERY,

CASSANDRA OWENS,

JUDY WILSON,

a/k/a Dolly Mae Morris,

SHARON CODY,

EVELYN SILINZY,

KIMBERLY WREN,

a/k/a Kimberly King,

a/k/a Sharon Woods,

HERMAN STAPLES,

RONALD D. HARLAN, JR.,

Defendants.

4:02CR00495CDP

INDICTMENT

INTRODUCTION

1. At all times relevant to this bank fraud scheme individuals would purchase bank checks in small amounts.

2. The purpose of purchasing these bank checks was to obtain legitimate checks in order to counterfeit them to defraud title insurance companies, financial institutions and individuals of money.

[Handwritten mark]


3. During this time period individuals known and unknown to this grand jury used false identification to further the scheme and artifice to defraud and obtain money by means of false and fraudulent pretenses, representations and promises. This false identification included the use of false names and false Social Security Account Numbers.

4. The title insurance companies that were defrauded or attempts made to defraud included:

- a) Nations Title Agency of Missouri, Inc. (Nations Title)
- b) Archway Title Agency, Inc. (Archway Title)
- c) Netco Title
- d) Commonwealth Land Title Insurance Company (Commonwealth Title)
- e) Phoenix Title Company (Phoenix Title)
- f) Land Title Company (Land Title)
- g) Banker's Title Agency, Inc. (Banker's Title)

5. The financial institutions that were defrauded or attempts made to defraud included:

- a) Gateway National Bank
- b) Bank of America
- c) First National Bank of St. Louis (First National Bank)
- d) Firststar Bank
- e) U.S. Bank
- f) First Bank
- g) Pulaski Bank

- 
- h) Normandy Bank
 - i) Jefferson Bank and Trust
 - j) Montgomery First National Bank
 - k) Allegiant Bank
 - l) United Missouri Bank
 - m) Meramec Valley Bank
 - n) American National Bank

6. At the time covered by events alleged in this indictment, all of the above financial institutions and their money, assets and accounts were insured by the Federal Deposit Insurance Corporation.

7. On many occasions, known and unknown individuals as well as named defendants would go to respective title insurance companies for the purpose of selling homes through the respective title insurance companies to a buyer who presented counterfeit checks to the title insurance companies.

8. On many of these occasions, the residential homes which were to be sold were falsely and fraudulently inflated as to value.

9. The title insurance companies would accept the counterfeit check from the buyer, deposit it into their own bank accounts, and then write a legitimate check or checks drawn on their account payable to the seller less fees and other expenses.

10. Quite often the seller of the property would negotiate the legitimate title insurance check at the title company's bank and convert it to cash or cashier's checks through a series of transactions and later split the proceeds.

~~ST. LOUIS COUNTY MISSOURI~~

11. On other occasions, individuals would open bank accounts in false names and deposit counterfeit checks into those accounts and later withdraw and attempt to withdraw money for purposes of splitting that money with other defendants named in this bank fraud scheme.

COUNT I

12. On or about November 14, 2001, in St. Louis City, Missouri, a Gateway National Bank check #4406407576 was purchased in the amount of \$20.00, payable to J & S Auto, remitter, Mike Cambell.

13. On or about November 26, 2001, the defendant, **HANEEF MAJEED**, sold 1411 Farrar, St. Louis, Missouri to an individual identified as Antonio L. Hutti for \$47,000.00 at Nations Title, St. Louis County, Missouri.

14. The individual identified as Antonio L. Hutti presented to Nations Title a counterfeit Gateway National Bank check #4406407576, in the amount of \$47,000.00 which was subsequently deposited to their bank account at Bank of America.

15. On or about November 26, 2001, Nations Title wrote a check payable to the defendant, **HANEEF MAJEED**, in the amount of \$44,796.42, representing the proceeds from the Farrar property sale.

16. On November 26, 2001, the defendant, **HANEEF MAJEED**, negotiated this Nations Title check in St. Louis County, Missouri at a branch bank of Bank of America in the following manner:



- a) deposited \$14,000.00 into his account at Bank of America;
- b) purchased three Bank of America cashier's checks:

<u>Check No.</u>	<u>Amount</u>	<u>Payee</u>
1322468	\$3,000.00	defendant MARTAY LOVE
1322469	\$5,000.00	defendant MICHAEL T. WASHINGTON
1322467	\$22,796.42	defendant HANEEF MAJEED

17. On November 26, 2001, the defendant, **HANEEF MAJEED**, converted Bank of America cashier's check #1322467 into \$10,000.00 cash, and a fourth cashier's check #1322470 in the amount of \$12,796.42, which was cashed later on November 26, 2001 at the Baden branch of Bank of America.

18. On November 26, 2001, the \$3,000.00 check, payable to defendant, **MARTAY LOVE**, was endorsed by defendant Love and deposited into the account of Iggy's Frozen Yogurt at the Dunn Road, St. Louis County branch of Bank of America. The defendant, **MICHAEL T. WASHINGTON**, is the owner of Iggy's Frozen Yogurt.

19. On November 26, 2001, the \$5,000.00 check payable to the defendant, **MICHAEL T. WASHINGTON**, was also cashed at the Dunn Road, St. Louis County branch of Bank of America.

20. The Grand Jury charges that:

On or about November 26, 2001, in St. Louis County, in the Eastern District of Missouri, the defendants,

**MICHAEL T. WASHINGTON,
MARTAY LOVE,
and HANEEF MAJEED,**

Sealed

did knowingly and willfully execute and attempt to execute the above scheme and artifice to defraud a financial institution, namely Bank of America, whose monies, funds, assets, and accounts were then insured by the Federal Deposit Insurance Corporation, and to obtain money and funds owned by or under the custody and control of Bank of America by means of materially false and fraudulent pretenses, representations and promises, namely the receipt of the Nations Title check for \$44,796.42 drawn on the Nations Title account at Bank of America.

In violation of Title 18, United States Code, Sections 2 and 1344(1) and (2).

COUNT II

1. The Grand Jury realleges and incorporates by reference herein paragraphs 1 through 19 of Count I.
2. The Grand Jury further charges that:

On or about November 26, 2001, in the County of St. Louis, in the Eastern District of Missouri, the defendants,

**MICHAEL T. WASHINGTON,
MARTAY LOVE,
and HANEEF MAJEED,**

did knowingly and willfully execute and attempt to execute the above scheme and artifice to defraud a financial institution, namely Bank of America, whose monies, funds, assets, and accounts were then insured by the Federal Deposit Insurance Corporation, and to obtain money and funds owned by or under the custody and control of Bank of America by means of materially false and fraudulent pretenses, representations and promises, namely the negotiation of the Nations Title check for \$44,796.42 at Bank of America.

In violation of Title 18, United States Code, Sections 2 and 1344(1) and (2).

~~SECRET~~

COUNT III

1. The Grand Jury realleges and incorporates by reference herein paragraphs 1 through 19 of Count I.

2. The Grand Jury further charges that:

On or about November 26, 2001, in the County of St. Louis, in the Eastern District of Missouri, the defendants,

**MICHAEL T. WASHINGTON,
MARTAY LOVE,
and HANEEF MAJEED ,**

did knowingly and willfully execute and attempt to execute the above scheme and artifice to defraud a financial institution, namely Bank of America, whose monies, funds, assets, and accounts were then insured by the Federal Deposit Insurance Corporation, and to obtain money and funds owned by or under the custody and control of Bank of America by means of materially false and fraudulent pretenses, representations and promises, namely the negotiation of the Bank of America cashier's check for \$22,796.42 at Bank of America.

In violation of Title 18, United States Code, Sections 2 and 1344(1) and (2).

COUNT IV

1. The Grand Jury realleges and incorporates by reference herein paragraphs 1 through 19 of Count I.

2. The Grand Jury further charges that:

On or about November 26, 2001, in the County of St. Louis, in the Eastern District of Missouri, the defendants,

**MICHAEL T. WASHINGTON,
MARTAY LOVE,
and HANEEF MAJEED,**

[REDACTED]

did knowingly and willfully execute and attempt to execute the above scheme and artifice to defraud a financial institution, namely Bank of America, whose monies, funds, assets, and accounts were then insured by the Federal Deposit Insurance Corporation, and to obtain money and funds owned by or under the custody and control of Bank of America by means of materially false and fraudulent pretenses, representations and promises, namely the negotiation of the Bank of America cashier's checks for \$5,000, payable to Michael Washington, and \$3,000.00 payable to Martay Love at Bank of America.

In violation of Title 18, United States Code, Sections 2 and 1344(1) and (2).

COUNT V

1. The Grand Jury realleges and incorporates by reference herein paragraphs 1 through 11 of Count I.

2. The Grand Jury further charges that:

On or about October 29, 2001, in St. Louis City, in the Eastern District of Missouri, Gateway National Bank check #4406407565 was purchased, payable to Tera Carson, in the amount of \$20.00, remitter, Antonio Hutti.

3. On or about November 5, 2001, in St. Louis City, in the Eastern District of Missouri, Gateway National Bank check number 4406408447 was purchased, payable to Tera Carson, in the amount of \$20.00, remitter Antonio Hutti.

4. On or about November 16, 2001, in St. Louis City, defendant **JOHN MONTGOMERY** sold two residences, 8512 Broadway and 5964-5964A Plymouth, St. Louis City at Archway Title, for \$62,300.00 and \$40,500.00, to an individual identified as Antonio L. Hutti.



5. On or about November 16, 2001, the individual identified as Antonio L. Hutti presented to Archway Title, two counterfeit Gateway National Bank checks with the above numbers, in the amounts of \$62,487.20 and \$41,228.72, to purchase the Broadway and Plymouth properties.

6. On or about November 16, 2001, the counterfeit check for \$62,487.20 was deposited into the Archway Title bank account at Montgomery First National Bank and the counterfeit check for \$41,228.72 was deposited into the Archway Title bank accounts at Allegiant Bank.

7. On or about November 16, 2001, Archway Title bank checks representing proceeds totaling \$59,584.07 were then made payable to:

8512 Broadway

<u>Check No.</u>	<u>Payee</u>	<u>Amount</u>	<u>Negotiation</u>
7024	Carl Wilson	\$ 1,500.00	Carl Wilson Alliance Credit Union
7025	John Montgomery	\$ 500.00	Endorsed back to Archway Title
7026	John Montgomery	\$10,000.00	Olive Light Loan & Mercantile Co. for cash
7027	John Montgomery	\$ 3,000.00	Olive Light Loan & Mercantile Co. for cash
7028	John Montgomery	\$ 5,000.00	Endorsed back to Archway Title

58 [REDACTED]

7029

John Montgomery

\$15,000.00

Used to purchase the following checks at Montgomery First National Bank:

#54138 \$1,500.00
Payee: Michael Washington, cashed at Bank of America

#54137 \$7,500.00
Payee: Michael Washington, cashed at Beverly Hills Grocery & Liquor

#54134 \$6,000.00
Payee: Equitable Credit Corp.

7030

John Montgomery

\$24,584.07

Used to purchase the following checks or convert to cash at Montgomery First National Bank:

#108927 \$2,600.00
Payee: St. Louis Teachers Community Credit Union

#108928 \$7,500.00
Payee: Archway Title Agency

#108929 \$3,962.07
Payee: John Montgomery, at Light Loan & Mercantile Co. for cash

\$10,000.00 cash to defendant **JOHN MONTGOMERY**

\$522.00 in numerous American Express Money Orders

~~SECRET~~

5964 Plymouth

<u>Check No.</u>	<u>Payee</u>	<u>Amount</u>
16088	John Montgomery	\$39,848.35

8. On or about November 17, 2001, the \$39,848.35 check payable to the defendant Montgomery was subsequently negotiated in St. Louis City at Montgomery First National Bank in the following manner:

<u>Check No.</u>	<u>Purchaser</u>	<u>Amount</u>	<u>Negotiation</u>
54136	defendant JOHN MONTGOMERY	\$7,850.00	Payee: Iggy's Frozen Yogurt, deposited into defendant MICHAEL T. WASHINGTON'S Bank of America account
54135	defendant JOHN MONTGOMERY	\$7,850.00	Payee: Iggy's Frozen Yogurt and cashed at Beverly Hills Grocery & Liquor, St. Louis County, Missouri, by defendant MICHAEL T. WASHINGTON
102872	defendant JOHN MONTGOMERY	\$10,000.00	Payee: Defendant John Montgomery and cashed at A-1 Check Cashing, St. Louis County, MO
102873	defendant JOHN MONTGOMERY	\$5,000.00	Payee: Eleanor Montgomery
54133	defendant JOHN MONTGOMERY	\$2,523.35	Payee: Homecoming Financial
003152790	defendant JOHN MONTGOMERY	\$1,000.00	Payee: Arrow Finance #32159
003152791	defendant JOHN MONTGOMERY	\$1,000.00	Payee: Gwendolyn D. Marble

003152792

defendant **JOHN MONTGOMERY**

\$ 625.00

Payee: Homecoming
Financial

\$4,000.00

Cash to defendant **JOHN
MONTGOMERY**

9. On or about November 16, 2001, in St. Louis City, in the Eastern District of Missouri, the defendants,

**MICHAEL T. WASHINGTON, and
JOHN MONTGOMERY,**

did knowingly and willfully execute and attempt to execute the above scheme and artifice to defraud a financial institution, namely Allegiant Bank and Montgomery First National Bank, whose monies, funds, assets, and accounts were then insured by the Federal Deposit Insurance Corporation, to obtain money and funds owned by or under the custody and control of Allegiant Bank and Montgomery First National Bank by means of materially false and fraudulent pretenses, representations and promises, namely that the above Gateway National Bank checks in the amounts of \$62,487.20 and \$41,228.72 were legitimate checks, when in truth and fact they were counterfeit checks.

In violation of Title 18, United States Code, Sections 2 and 1344(1) and (2).

COUNT VI

1. The Grand Jury realleges and incorporates by reference herein paragraphs 1 through 11 of Count I and paragraphs 2 through 8 of Count V.

2. The Grand Jury further charges:

On or about November 16, 2001, in the City of St. Louis, in the Eastern District of Missouri, the defendants,



**MICHAEL T. WASHINGTON, and
JOHN MONTGOMERY,**

did knowingly and willfully execute and attempt to execute the above scheme and artifice to defraud a financial institution, namely Montgomery First National Bank, whose monies, funds, assets, and accounts were then insured by the Federal Deposit Insurance Corporation, to obtain money and funds owned by or under the custody and control of Montgomery First National Bank by means of materially false and fraudulent pretenses, representations and promises, namely the negotiation of six checks totaling \$58,084.07, drawn on the Archway Title account at Montgomery First National Bank.

In violation of Title 18, United States Code, Sections 2 and 1344(1) and (2).

COUNT VII

1. The Grand Jury realleges and incorporates by reference herein paragraphs 1 through 11 of Count I and paragraphs 2 through 8 of Count V.

2. The Grand Jury further charges:

On or about November 17, 2001, in St. Louis City, Eastern District of Missouri, the defendants,

**MICHAEL T. WASHINGTON, and
JOHN MONTGOMERY,**

did knowingly and willfully execute and attempt to execute the above scheme and artifice to defraud a financial institution, namely Montgomery First National Bank, to obtain money and funds owned by or under the custody and control of Montgomery First National Bank, whose monies, funds, assets, and accounts were then insured by the Federal Deposit Insurance Corporation, by means of materially false and fraudulent pretenses, representations and

~~SECRET~~

promises, namely by negotiating Allegiant Bank check #16088, payable to John Montgomery, in the amount of \$39,848.35, at Montgomery First National Bank.

In violation of Title 18, United States Code, Sections 2 and 1344(1) and (2).

COUNT VIII

1. The Grand Jury realleges and incorporates by reference herein paragraphs 1 through 11 of Count I.

2. The Grand Jury further charges:


On or about November 13, 2001, Phoenix Title, St. Louis County, Missouri received an order for a real estate closing on two properties, 5020 Minerva, St. Louis, Missouri (\$68,750.00) and 4700 Plover, St. Louis, Missouri (\$68,700.00). The buyer was represented to be an individual identified as Antonio Hutti. The seller was represented to be the defendant,

CASSANDRA OWENS.

3. On or about November 19, 2001, in St. Louis City, three Gateway National Bank checks numbered 4406407580, 4406407581, and 4406407582 were purchased in small amounts, remitter, Antonio Hutti.

4. On or about December 7, 2001, the defendant, **CASSANDRA OWENS**, and an individual identified as Antonio Hutti, went to Phoenix Title, St. Louis County, Missouri. However, the sale did not occur.

5. On or about December 13, 2001, the defendant, **CASSANDRA OWENS**, again attempted to sell 5020 Minerva and 4700 Plover through Netco Title, St. Louis County, Missouri to an individual identified as Antonio Hutti.



6. On or about December 13, 2001, three Gateway National Bank counterfeit checks, numbers 4406407580 (\$59,389.80), 4406407581 (\$68,947.13), and 4406407582 (\$68,894.40) were presented to Netco Title by Antonio Hutti for purposes of purchasing the properties from the defendant, **CASSANDRA OWENS**, and a third property 4719 Genevieve, St. Louis, Missouri, from defendant **KIMBERLY WREN, a/k/a Kimberly King, a/k/a Sharon Woods**.

7. On or about December 13, 2001, Netco Title called Gateway National Bank and learned the three checks were counterfeit.

8. On or about December 13, 2001, in St. Louis County, in the Eastern District of Missouri, the defendants,

**CASSANDRA OWENS and
KIMBERLY WREN, a/k/a Kimberly King, a/k/a Sharon Woods,**

did knowingly and willfully execute and attempt to execute the above scheme and artifice to defraud a financial institution, namely American National Bank, whose monies, funds, assets, and accounts were then insured by the Federal Deposit Insurance Corporation, and to obtain money and funds owned by or under the custody and control of American National Bank by means of materially false and fraudulent pretenses, representations and promises, namely the above three Gateway National Bank checks totaling \$197,231.33 were legitimate checks when presented to Netco Title for deposit into their bank account at American National Bank when in truth and fact they were counterfeit checks.

In violation of Title 18, United States Code, Sections 2 and 1344(1) and (2).


COUNT IX

1. The Grand Jury realleges and incorporates by reference herein paragraphs 1 through 11 of Count I.

2. The Grand Jury further charges:

Between on or about November 14, 2001 and November 19, 2001, in St. Louis City, Roger L. Checks, using the name Troy Checks, Jr., and an individual using the name Antonio Hutti, purchased Firststar Bank and Gateway National Bank checks.

3. On or about December 28, 2001, in St. Louis County, Missouri, Roger L. Checks in the name of Troy Checks, Jr. opened a bank account with a cash deposit of \$100.00 at Normandy Bank.

4. On or about January 3, 2002, in St. Louis County, Roger L. Checks deposited a \$25,000.00 counterfeit check drawn on Gateway National Bank into this Normandy Bank account.

5. On or about January 4, 2002, in St. Louis County, Roger L. Checks withdrew \$5,000.00 cash from this Normandy Bank account.

6. On or about January 4, 2002, in St. Louis County, Roger L. Checks deposited a \$7,000.00 counterfeit check drawn on Firststar Bank into this Normandy Bank account.

7. On or about January 5, 2002, in St. Louis County, Roger L. Checks attempted to deposit into this Normandy Bank account two counterfeit checks, one drawn on Gateway National Bank (\$27,000.00) and another drawn on Firststar Bank (\$6,500.00).

8. This was all done at the direction and knowledge of defendants **MICHAEL T. WASHINGTON** and **MARTAY LOVE**.

[REDACTED]

9. On or about December 28, 2001, in St. Louis County, in the Eastern District of Missouri, the defendants,

**MICHAEL T. WASHINGTON, and
MARTAY LOVE,**

did knowingly and willfully execute and attempt to execute a scheme and artifice to defraud a financial institution, Normandy Bank, whose monies, funds, assets, and accounts were then insured by the Federal Deposit Insurance Corporation, and to obtain money owned by and under the custody and control of Normandy Bank by means of materially false and fraudulent pretenses, representations and promises, namely causing Roger L. Cheeks, using the false name of Troy Cheeks, Jr., to open a bank account for the purpose of executing and attempting to execute the above scheme and to obtain money from said financial institution.

In violation of Title 18, United States Code, Sections 2 and 1344(1) and (2).

COUNT X

1. The Grand Jury realleges and incorporates by reference herein paragraphs 1 through 11 of Count I and paragraphs 2 through 8 of Count IX.

2. The Grand Jury further charges:

On or about January 3, 2002, in St. Louis County, in the Eastern District of Missouri, the defendants,

**MICHAEL T. WASHINGTON and
MARTAY LOVE,**

did knowingly and willfully execute and attempt to execute a scheme and artifice to defraud a financial institution, Normandy Bank, whose monies, funds, assets, and accounts were then insured by the Federal Deposit Insurance Corporation and to obtain money owned and under the



custody and control of Normandy Bank by means of materially false and fraudulent pretenses, representations, and promises, namely causing the deposit of a \$25,000.00 counterfeit check drawn on Gateway National Bank, into the Troy Cheeks, Jr. account for purposes of executing and attempting to execute the above scheme to obtain money from said financial institution.

In violation of Title 18, United States Code, Sections 2 and 1344(1) and (2).

COUNT XI

1. The Grand Jury realleges and incorporates herein by reference paragraphs 1 through 11 of Count I and paragraphs 2 through 8 of Count IX.

2. The Grand Jury further charges that:

On or about January 4, 2002, in St. Louis County, in the Eastern District of Missouri, the defendants,

**MICHAEL T. WASHINGTON and
MARTAY LOVE,**

did knowingly and willfully execute and attempt to execute a scheme and artifice to defraud a financial institution, Normandy Bank, whose monies, funds, assets, and accounts were then insured by the Federal Deposit Insurance Corporation and to obtain money owned and under the custody and control of Normandy Bank by means of materially false and fraudulent pretenses, representations, and promises, namely causing the deposit of a \$7,000.00 counterfeit check drawn on Firststar Bank, into the Troy Cheeks, Jr. account for purposes of executing and attempting to execute the above scheme to obtain money from said financial institution.

In violation of Title 18, United States Code, Sections 2 and 1344(1) and (2).



COUNT XII

1. The Grand Jury realleges and incorporates herein by reference paragraphs 1 through 11 of Count I and paragraphs 2 through 8 of Count IX.

2. The Grand Jury further charges that:

On or about January 5, 2002, in St. Louis County, in the Eastern District of Missouri, the defendants,

**MICHAEL T. WASHINGTON and
MARTAY LOVE,**

did knowingly and willfully execute and attempt to execute a scheme and artifice to defraud a financial institution, Normandy Bank, whose monies, funds, assets, and accounts were then insured by the Federal Deposits Insurance Corporation and to obtain money owned and under the custody and control of Normandy Bank by means of materially false and fraudulent pretenses, representations, and promises, namely causing the attempted deposit of two counterfeit checks, one drawn on Firststar Bank (\$6,500.00) and another drawn on Gateway National Bank (\$27,000.00), into the Troy Checks, Jr. account for purposes of executing and attempting to execute the above scheme and to obtain money from said financial institution.


In violation of Title 18, United States Code, Sections 2 and 1344(1) and (2).

COUNT XIII

1. The Grand Jury realleges and incorporates by reference herein paragraphs 1 through 11 of Count I.

2. The Grand Jury further charges that:

On or about November 14, 2001, in St. Louis City, Missouri, Roger L. Checks purchased three Firststar Bank checks in small amounts.



3. On or about December 21, 2001, in St. Louis City, Missouri, Irvin Friedman deposited into his bank account at Jefferson Bank and Trust three counterfeit Firststar Bank checks, bearing the same check numbers as those purchased in paragraph two, payable to Irvin Friedman in the amounts of \$98,669.13, \$98,667.35 and \$92,663.52, remitter R.T. Phillips.

4. On or about December 24, 2001, Irvin Friedman withdrew \$5,000.00 cash and subsequently all three checks were determined to be counterfeit.

On or about December 21, 2001, in St. Louis City, in the Eastern District of Missouri, the defendants,

**MICHAEL L. WASHINGTON, and
MARTAY LOVE,**

did knowingly and willfully execute and attempt to execute a scheme and artifice to defraud a financial institution, Jefferson Bank and Trust, whose monies, funds, assets, and accounts were then insured by the Federal Deposit Insurance Corporation and to obtain money owned and under the custody and control of Jefferson Bank and Trust by means of materially false and fraudulent pretenses, representations, and promises, namely by causing the deposit of the above described three counterfeit Firststar Bank checks into the account of Irvin Friedman.

In violation of Title 18, United States Code, Sections 2 and 1344(1) and (2).

COUNT XIV

1. The Grand Jury realleges and incorporates by reference herein paragraphs 1 through 11 of Count I.

2. The Grand Jury further charges: On or about January 14, 2002, in St. Louis City, a Firststar Bank check #192703760 was purchased for \$25.00, remitter, Taylor Evans.



3. On or about January 23, 2002, in St. Louis City, the defendant, **SHARON CODY**, sold 3611 Paris Avenue to the defendant, **JUDY WILSON, a/k/a Dolly Mae Morris** at Commonwealth Title for \$85,500.00.

4. On or about January 23, 2002, in the St. Louis City, the defendant, **JUDY WILSON, a/k/a Dolly Mae Morris**, presented to Commonwealth Title a counterfeit Firststar Bank check #192703760, in the amount of \$86,044.16. This check was deposited into the Commonwealth Title account at First National Bank, St. Louis County, Missouri, on or about January 24, 2002.

5. On January 23, 2002, in St. Louis City, Commonwealth created a \$26,436.62 check, payable to **SHARON CODY**, representing the sale of the Paris property. A second Commonwealth Title check was made payable to Home Equity Servicing, Corp. to pay off the mortgage on the Paris property.

6. On January 23, 2002, the defendant, **SHARON CODY**, negotiated the \$26,436.62 check into First National Bank, Clayton, Missouri. \$12,000.00 was received in cash with the balance disbursed in the form of a First National Bank cashier's check #565926 payable to the defendant **SHARON CODY**. On the same day, the defendant, **SHARON CODY**, converted this cashier's check into cash at the First National Bank branch located at Des Peres, Missouri.

7. On or about January 23, 2002, in St. Louis County, in the Eastern District of Missouri, the defendants,

**SHARON CODY and
JUDY WILSON, aka Dolly Mae Morris,**

did knowingly and willfully execute and attempt to execute the above scheme and artifice to



defraud a financial institution, namely First National Bank, whose monies, funds, assets, and accounts were then insured by the Federal Deposit Insurance Corporation, and to obtain money and funds owned by or under the custody and control of First National Bank by means of materially false and fraudulent pretenses, representations and promises, namely the above Firststar Bank check totaling \$86,044.16 was a legitimate check when presented to Commonwealth Title for deposit into their bank account at First National Bank when in truth and fact it was a counterfeit check.

In violation of Title 18, United States Code, Sections 2 and 1344(1) and (2).

COUNT XV

1. The Grand Jury realleges and incorporates by reference herein paragraphs 1 through 11 of Count I and paragraphs 2 through 6 of Count XIV.

2. The Grand Jury further charges:

On or about January 23, 2002, in St. Louis County, in the Eastern District of Missouri, the defendant,

SHARON CODY,

did knowingly and willfully execute and attempt to execute the above scheme and artifice to defraud a financial institution, namely First National Bank, whose monies, funds, assets, and accounts were then insured by the Federal Deposit Insurance Corporation, and to obtain money and funds owned by or under the custody and control of First National Bank by means of materially false and fraudulent pretenses, representations and promises, namely the above First National Bank check totaling \$26,436.62 and negotiated it by converting it to cash at two separate First National Bank branches.



In violation of Title 18, United States Code, Sections 2 and 1344(1) and (2).

COUNT XVI

1. The Grand Jury further charges that:

On or about January 23, 2002, in St. Louis City, in the Eastern District of Missouri, the defendant,

**JUDY WILSON,
a/k/a Dolly Mae Morris,**

did knowingly use, without lawful authority, a means of identification of another person, namely the name Dolly Mae Morris, a birth date of January 28, 1955, and a false and counterfeit Missouri Drivers Licence D040281255, with intent to commit and to aid and abet unlawful activity constituting a felony under Missouri State law or the laws of the United States.

In violation of Title 18, United States Code, Sections 2 and 1028(a)(7).


COUNT XVII

1. The Grand Jury realleges and incorporates by reference herein paragraphs 1 through 11 of Count I.

2. The Grand Jury further charges that:

Between March 1, 2002 and March 7, 2002, in St. Louis County, four U.S. Bank checks were purchased for \$20.00 each, three were payable to Tina Chambers, remitter Tina Chambers and the fourth was payable to Tanya Brown, remitter Tanya Brown.

3. On or about March 8, 2002 in St. Louis County, at Phoenix Title, the defendant, **EVELYN SILINZY**, sold 1037 Pleasant Meadows Drive, Lake St. Louis, Missouri to defendant **KIMBERLY WREN, a/k/a Kimberly King, a/k/a Sharon Woods** for \$392,000.00.



4. On March 8, 2002, in St. Louis County, the defendant, **KIMBERLY WREN, a/k/a Kimberly King, a/k/a Sharon Woods**, gave Phoenix Title four counterfeit U.S. Bank checks each in the amount of \$98,045.84. These counterfeit checks had the same check numbers as the ones purchased and alleged in paragraph 2 of this count.

5. On March 8, 2002, these four checks were deposited by Phoenix Title into their bank account at First Bank, St. Charles County, Missouri.

6. On March 8, 2002, Phoenix Title created a legitimate check on their account, payable to defendant **JUDY WILSON, a/k/a Dolly Mae Morris** in the amount of \$51,250.00, representing a payment of a fictitious second mortgage on the above property.

7. On or about March 8, 2002, the defendant, **JUDY WILSON, a/k/a Dolly Mae Morris**, negotiated the \$51,250.00 check at First Bank, St. Charles County, Missouri in \$2,000.00 cash and three bank checks for \$15,000.00, \$15,000.00 and \$19,232.00, payable to Dolly Mae Morris.

8. On or about March 8, 2002, the defendant, **JUDY WILSON, a/k/a Dolly Mae Morris** unsuccessfully attempted to cash the above three bank checks at another First Bank branch.

9. Between March 9, 2002, and March 13, 2002, defendants **JUDY WILSON, a/k/a Dolly Mae Morris, MICHAEL T. WASHINGTON** and **MARTAY LOVE**, cashed these three checks through Salama's Market, St. Louis, Missouri.

10. On March 18, 2002, a cash deposit of \$6,200.00 was made into the defendant **MICHAEL T. WASHINGTON's** Iggy's Frozen Yogurt Bank of America account, St. Louis County, Missouri.



11. On or about March 8, 2002, in St. Charles County, in the Eastern District of Missouri, the defendants,

**KIMBERLY WREN, a/k/a Kimberly King, a/k/a Sharon Woods
and EVELYN SILINZY,**

did knowingly and willfully execute and attempt to execute the above scheme and artifice to defraud a financial institution, namely First Bank, whose monies, funds, assets, and accounts were then insured by the Federal Deposit Insurance Corporation, and to obtain money and funds owned by or under the custody and control of First Bank by means of materially false and fraudulent pretenses, representations and promises, namely the above four counterfeit U.S. Bank checks totaling \$392,183.36, deposited into the Phoenix Title First Bank account in St. Charles County, Missouri.

In violation of Title 18, United States Code, Sections 2 and 1344(1) and (2).

COUNT XVIII


1. The Grand Jury realleges and incorporates by reference herein paragraphs 1 through 11 of Count I and paragraphs 2 through 10 of count XVII.

2. The Grand Jury further charges that:

On or about March 8, 2002, in St. Charles County, in the Eastern District of Missouri, the defendants,

**JUDY WILSON, a/k/a Dolly Mae Morris, and
EVELYN SILINZY,**

did knowingly and willfully execute and attempt to execute the above scheme and artifice to defraud a financial institution, namely First Bank, whose monies, funds, assets, and accounts were then insured by the Federal Deposit Insurance Corporation, and to obtain money and funds



owned by or under the custody and control of First Bank by means of materially false and fraudulent pretenses, representations and promises, namely causing the creation of a legitimate check drawn on the Phoenix Title First Bank account, payable to Dolly Mae Morris, in the amount of \$51,250.00.

In violation of Title 18, United States Code, Sections 2 and 1344(1) and (2).

COUNT XIX

1. The Grand Jury realleges and incorporates by reference herein paragraphs 1 through 11 of Count I and paragraphs 2 through 10 of count XVII.

2. The Grand Jury further charges that:

On or about March 8, 2002, in St. Louis County, in the Eastern District of Missouri, the defendants,

JUDY WILSON, a/k/a Dolly Mae Morris,

did knowingly and willfully execute and attempt to execute the above scheme and artifice to defraud a financial institution, namely First Bank, whose monies, funds, assets, and accounts were then insured by the Federal Deposit Insurance Corporation and to obtain money and funds owned by or under the custody and control of First Bank by means of materially false and fraudulent pretenses, representations and promises, namely causing the negotiation of the \$51,250.00 check drawn on First Bank, in the form of \$2,000.00 cash currency and three bank checks, payable to Dolly Mae Morris, two in the amount of \$15,000.00 each and one in the amount of \$19,232.00.

In violation of Title 18, United States Code, Sections 2 and 1344(1) and (2).


COUNT XX

1. The Grand Jury realleges and incorporates by reference herein paragraphs 1 through 11 of Count I and paragraphs 2 through 10 of count XVII.

2. The Grand Jury further charges that:

Between on or about March 9, 2002, and March 13, 2002, in St. Louis County, in the Eastern District of Missouri, the defendants,

**JUDY WILSON, a/k/a Dolly Mae Morris,
MICHAEL T. WASHINGTON, and
MARTAY LOVE,**

did knowingly and willfully execute and attempt to execute the above scheme and artifice to defraud a financial institution, namely Meramec Valley Bank, whose monies, funds, assets, and accounts were then insured by the Federal Deposit Insurance Corporation, and to obtain money and funds owned by or under the custody and control of Meramec Valley Bank by means of materially false and fraudulent pretenses, representations and promises, namely causing the negotiation and deposit of these three First Bank checks for \$15,000.00, \$15,000.00 and \$19,232.00, into the account of Mike Salameh at Meramec Valley Bank.

In violation of Title 18, United States Code, Sections 2 and 1344(1) and (2).

COUNT XXI

1. The Grand Jury further charges that:

On or about March 11, 2002, in St. Louis City, in the Eastern District of Missouri, the defendant,

**JUDY WILSON
a/k/a Dolly Mae Morris,**

with the intent to deceive, did falsely represent Social Security Account Number 497-12-7825 to



be the Social Security Account Number assigned by the Commissioner of Social Security when in truth and fact, that number was not the Social Security Account Number assigned to her by the Commissioner of Social Security.

In violation of Title 42, United States Code, Section 408(a)(7)(B).

COUNT XXII

1. The Grand Jury further charges that:

On or about March 8, 2002, in St. Louis County, in the Eastern District of Missouri, the defendant,

**KIMBERLY WREN
a/k/a KIMBERLY KING,
a/k/a SHARON JONES,**

with the intent to deceive, did falsely represent Social Security Account Number 497-28-4149 to be the Social Security Account Number assigned by the Commissioner of Social Security when in truth and fact, that number was not the Social Security Account Number assigned to her by the Commissioner of Social Security.

In violation of Title 42, United States Code, Section 408(a)(7)(B).

COUNT XXIII

1. The Grand Jury realleges and incorporates by reference herein paragraphs 1 through 11 of Count I.

2. The Grand Jury further charges that:

On or about March 1, 2002, in St. Louis County, U.S. Bank check #181904469 was purchased, payable to Tanya Brown, remitter Tanya Brown, in the amount of \$20.00.

1. The Grand Jury realleges and incorporates herein by reference paragraphs 1 through 11 of Count I.

2. The Grand Jury further charges that:

On or about June 12, 2002, in St. Louis County, a U.S. Bank check #504370301 was purchased for \$20.00 by the defendant, **HERMAN STAPLES**, payable to AT&T, remitter Andrew Blatt.



[REDACTED]

571146	\$10,000.00	Ronald D. Harlan	Cashed at the Des Peres branch of First National Bank
571147	\$ 4,723.41	Ronald D. Harlan	Cashed at the Des Peres branch of First National Bank
571148	\$10,000.00	Ronald D. Harlan	Cashed at the Des Peres branch of First National Bank
N/A	\$12,000.00	N/A	Cash

8. Between on or about June 28, 2002 and July 1, 2002, in St. Louis County, the defendant, **RONALD D. HARLAN, JR.**, cashed two First National Bank checks totaling \$20,000.00 at the First National Bank in Ladue, Missouri and five First National Bank checks totaling \$44,723.41 at the First National Bank in Des Peres, Missouri.

9. On or about June 12, 2002, in St. Louis County, in the Eastern District of Missouri, the defendant,

HERMAN STAPLES,

did knowingly and willfully execute and attempt to execute the above scheme and artifice to defraud a financial institution, namely U.S. Bank, whose monies, funds, assets, and accounts were then insured by the Federal Deposit Insurance Corporation, to obtain money and funds owned by or under the custody and control of U.S. Bank by means of materially false and fraudulent pretenses, representations and promises, namely the purchase of U.S. Bank check # 504370301, in the amount of \$20.00, payable to AT&T, remitter Andrew Blatt.

In violation of Title 18, United States Code, Sections 2 and 1344(1) and (2).

~~CONFIDENTIAL~~

COUNT XXV

1. The Grand Jury realleges and incorporates herein by reference paragraphs 1 through 11 of Count I and paragraphs 2 through 8 of Count XXIV.

2. The Grand Jury further charges:

On or about June 28, 2002, in St. Louis County, in the Eastern District of Missouri, the defendant,

RONALD D. HARLAN, JR.,

did knowingly and willfully execute and attempt to execute the above scheme and artifice to defraud a financial institution, namely First National Bank, whose monies, funds, assets, and accounts were then insured by the Federal Deposit Insurance Corporation, and to obtain money and funds owned by or under the custody and control of First National Bank by means of materially false and fraudulent pretenses, representations and promises, namely the receipt of the Land Title check for \$76,723.41, drawn on the Land Title account at First National Bank.

In violation of Title 18, United States Code, Sections 2 and 1344(1) and (2).

COUNT XXVI

1. The Grand Jury realleges and incorporates herein by reference paragraphs 1 through 11 of Count I and paragraphs 2 through 8 of Count XXIV.

2. The Grand Jury further charges:

On or about July 1, 2002, in St. Louis County, in the Eastern District of Missouri, the defendant,

RONALD D. HARLAN, JR.,

did knowingly and willfully execute and attempt to execute the above scheme and artifice to

SECRETED

defraud a financial institution, namely First National Bank, whose monies, funds, assets, and accounts were then insured by the Federal Deposit Insurance Corporation and to obtain money and funds owned by or under the custody and control of First National Bank by means of materially false and fraudulent pretenses, representations and promises, namely the negotiation of the Land Title check for \$76,723.41 at First National Bank.

In violation of Title 18, United States Code, Sections 2 and 1344(1) and (2).

COUNT XXVII

1. The Grand Jury realleges and incorporates herein by reference paragraphs 1 through 11 of Count I and paragraphs 2 through 8 of Count XXIV.

2. The Grand Jury further charges:

On or about July 1, 2002, in St. Louis County, in the Eastern District of Missouri, the defendant,

RONALD D. HARLAN, JR.,

did knowingly and willfully execute and attempt to execute the above scheme and artifice to defraud a financial institution, namely First National Bank, whose monies, funds, assets, and accounts were then insured by the Federal Deposit Insurance Corporation and to obtain money and funds owned by or under the custody and control of First National Bank by means of materially false and fraudulent pretenses, representations and promises, namely the negotiation of the seven First National Bank checks for cash referenced above in Count XXIV, payable to Ronald D. Harlan at First National Bank.

In violation of Title 18, United States Code, Sections 2 and 1344(1) and (2).



A TRUE BILL.

Betty J. Schumacher
FOREPERSON

RAYMOND W. GRUENDER
United States Attorney

Michael W. Reap
MICHAEL W. REAP, #9156
Assistant United States Attorney