

FILED  
U.S. DISTRICT COURT E.D.N.Y.  
★ NOV 15 2018 ★  
BROOKLYN OFFICE

SSS:TAW  
F. #2017R01454

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

I N F O R M A T I O N

- against -

Cr. No. \_\_\_\_\_  
(T. 18, U.S.C., §§ 981(a)(1)(C), 1349  
and 3551 et seq.; T. 21, U.S.C.,  
§ 853(p); T. 28, U.S.C., § 2461(c))

LEONARD WILLIAMS,

Defendant.

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THE UNITED STATES ATTORNEY CHARGES:

I N T R O D U C T I O N

At all times relevant to this Information, unless otherwise indicated:

I. The Defendant

1. The defendant LEONARD WILLIAMS was a resident of Staten Island, New York.

II. The Fraudulent Scheme

2. In or about and between January 2016 and November 2017, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant LEONARD WILLIAMS, together with others, devised and executed a scheme to defraud elderly individuals throughout the United States (the "Victims") and to obtain money from them.

3. In furtherance of the scheme, the defendant LEONARD WILLIAMS, while in New York State, repeatedly accessed the "Whitepages" website, accessible at [www.whitepages.com](http://www.whitepages.com), to identify the names and telephone numbers of the Victims. That

website was hosted on servers located outside New York State. WILLIAMS, together with others, then called the Victims and falsely told them that people known to them were in need of immediate financial help, and that the Victims could assist by providing money to the caller. It was a further part of the scheme that WILLIAMS told the Victims to withdraw cash from their bank accounts and to give that cash in person to a co-conspirator (“Co-Conspirator 1”). In several instances, WILLIAMS falsely told Victims that someone they knew had been arrested and needed money for bail. In response, several Victims withdrew cash from banks and gave it to Co-Conspirator 1.

#### CONSPIRACY TO COMMIT WIRE FRAUD

4. The allegations contained in paragraphs one through three are realleged and incorporated as if fully set forth in this paragraph.

5. In or about and between January 2016 and November 2017, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant LEONARD WILLIAMS, together with others, did knowingly and intentionally conspire to devise a scheme and artifice to defraud the Victims, and to obtain money from the Victims by means of false and fraudulent pretenses, representations and promises, and for the purpose of executing such scheme and artifice, to transmit and cause to be transmitted one or more writings, signs, signals, pictures and sounds by means of wire communication in interstate commerce, contrary to Title 18, United States Code, Section 1343.

(Title 18, United States Code, Sections 1349 and 3551 et seq.)

#### CRIMINAL FORFEITURE ALLEGATION

6. The United States hereby gives notice to the defendant that, upon his conviction of the offense charged herein, the government will seek forfeiture in accordance with Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section

2461(c), which require any person convicted of such offense to forfeit any property, real or personal, constituting, or derived from, proceeds obtained directly or indirectly as a result of such offense.


7. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided

without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described in this forfeiture allegation.

(Title 18, United States Code, Section 981(a)(1)(C); Title 21, United States Code, Section 853(p); Title 28, United States Code, Section 2461(c))

  
RICHARD P. DONOGHUE  
UNITED STATES ATTORNEY  
EASTERN DISTRICT OF NEW YORK

F. # 2017R01454  
FORM DBD-34  
JUN. 85

No.

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**UNITED STATES DISTRICT COURT**

EASTERN *District of* NEW YORK

CRIMINAL DIVISION

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THE UNITED STATES OF AMERICA

vs.

LEONARD WILLIAMS,

Defendant.

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**INFORMATION**

(T. 18, U.S.C., §§ 981(a)(1)(C), 1349 and 3551 et seq.;  
T. 21, U.S.C., § 853(p); T. 28, U.S.C., § 2461(c))

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*A true bill.*

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*Foreperson*

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Filed in open court this ----- day,

of ----- A.D. 20 -----

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*Clerk*

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Bail, \$ -----  
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***Temidayo Aganga-Williams, Assistant U.S. Attorney (718) 254-6183***