

ORIGINAL

FILED IN THE
UNITED STATES DISTRICT COURT
DISTRICT OF HAWAII

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Attorneys for Plaintiff
UNITED STATES OF AMERICA

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAII

UNITED STATES OF AMERICA,

Plaintiff,

vs.

BRADLEY J. HAMPTON,

Defendant.

) CR. NO. **C R 19 - 00014 DKW**
)
) INDICTMENT
)
) 18 U.S.C. § 1344
) (Bank Fraud)
) 18 U.S.C. § 1028A
) (Aggravated Identity Theft)
)
)

INDICTMENT

The Grand Jury charges:

Counts 1-6
Bank Fraud
(18 U.S.C. § 1344)

Introduction

At all times material to this Indictment:

1. Hawaii USA Federal Credit Union (FCU) was a credit union whose deposits were insured by the National Credit Union Association.
2. BRADLEY J. HAMPTON, the defendant, was an employee of Hawaii USA FCU, and was assigned a unique employee number to access Hawaii USA FCU's computers to conduct financial transactions.

The Scheme And Artifice To Defraud

3. From on or about February 23, 2017 through in or about July 2018, both dates being approximate and inclusive, within the District of Hawaii, BRADLEY J. HAMPTON, the defendant, did knowingly and willfully execute, and attempt to execute, a scheme and artifice to defraud Hawaii USA FCU, a financial institution as defined in Title 18, United States Code, section 20(2), and to obtain money and property owned by, or under the custody or control of, Hawaii USA FCU, by means of materially false and fraudulent pretenses, representations and promises, as well as omissions of material fact, well knowing at the time that

such pretenses, representations, promises and omissions would be and were falsely made, all as more fully described below.

A. HAMPTON made withdrawals from three accounts, and used the money to purchase cashier's checks totaling approximately \$76,891.39 made payable to his landlord, making it appear as if the transactions were authorized by the account holders, when in fact they were not.

B. In order to conduct the transactions, conceal his acts, and keep the scheme to defraud alive, HAMPTON made false entries in Hawaii USA FCU's records, included forging the signature of an account holder, using the account holder's Hawaii driver's license number, and making notations that withdrawals were being made at the request of the account holder. HAMPTON also provided documents purported to be signed by the account holder, falsely indicating that the withdrawals were authorized. In fact, HAMPTON knew that the withdrawals were not initiated or authorized by the account holders, and that the entries and documents were false.

The Execution Of The Scheme

4. On or about the following dates, within the District of Hawaii, BRADLEY J. HAMPTON, the defendant, for the purpose of executing and attempting to execute the aforesaid scheme and artifice to defraud, conducted the

following transactions without the authority of the specified Hawaii USA FCU account holders, with each such transaction constituting a separate count of this

Indictment:

COUNT	DATE	TRANSACTION
1	2/23/17	Withdrawal of \$9,050.00 from account of P. M. and purchase of cashier's check
2	6/10/17	Withdrawal of \$8,220.00 from account of C.C. and purchase of cashier's check
3	9/9/17	Withdrawal of \$10,400.00 from account of L.Y.Y. Trust and purchase of cashier's check
4	12/11/17	Withdrawal of \$16,663.62 from account of L.Y.Y. Trust and purchase of cashier's check
5	5/23/18	Withdrawal of \$16,657.77 from account of L.Y.Y. Trust and purchase of cashier's check
6	6/23/18	Withdrawal of \$15,900.00 from account of L.Y.Y. Trust and purchase of cashier's check

COUNT 7
Aggravated Identity Theft
(18 U.S.C. § 1028A)

On or about the dates alleged in counts 1 through 6, within the District of Hawaii, and during and in relation to the bank fraud offenses specified in such counts, BRADLEY J. HAMPTON, the defendant, did knowingly possess and use, without lawful authority, the means of identification of other persons, namely, the names, account numbers, signature and Hawaii's driver's license of such account holders.

All in in violation of Title 18, United States Code, Section 1028A.

FORFEITURE ALLEGATIONS

1. The allegations contained in all paragraphs of counts 1-6 of this Indictment are realleged and incorporated by reference for the purpose of noticing forfeitures pursuant to Title 28, United States Code, Section 2461(c).

2. The United States hereby gives notice to the defendant charged in counts 1-6 of this Indictment that, upon conviction of the offenses charged in those counts, the government will seek forfeiture, in accordance with Title 28, United States Code, Section 2461(c), and Title 18, United States Code, Section 981(a)(1)(C), of any and all property, real or personal, that constitutes or is derived from proceeds traceable to the violations of Title 18, United States Code, Section 1344 alleged in

counts 1-6, including but not limited to a sum of money equal to at least \$76,891.39 in United States currency.

3. If by any act or omission of the defendant, any of the property subject to forfeiture described in paragraph 2 herein (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 subdivided without difficulty, then United States of America will be entitled to the forfeiture of substitute property up to the value of the property described above in paragraph 2, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

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DATED: February 7, 2019 at Honolulu, Hawaii.

A TRUE BILL

/s/ Foreperson
FOREPERSON, GRAND JURY



KENJI M. PRICE
United States Attorney
District of Hawaii



LAWRENCE L. TONG
Assistant U.S. Attorney

United States v. Bradley J. Hampton
Indictment
Cr. No. CR 19-00014

DKW