

SEALED

CLERK US DISTRICT COURT
NORTHERN DIST. OF TX
FILED

ORIGINAL

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

2014 JAN 23 AM 10:50
DEPUTY CLERK *J. Alu*

UNITED STATES OF AMERICA

v.

ANTHONY MINOR (1)
TILISHA MORRISON (2)
KATRINA THOMAS (3)
KARIO BUTLER (4)
KAREN MENDOZA (5)
CYRUS PRITCHETT (6)
JAMILAH KARRIEM (7)

CRIMINAL NO. 3:13-CR-415-L
(Supersedes Indictment returned on
October 22, 2013)

FILED UNDER SEAL

FIRST SUPERSEDING INDICTMENT

The Grand Jury Charges:

INTRODUCTION

At all times relevant to this first superseding indictment:

1. Beginning on or about October 2009 and continuing until in or about July 2013, the defendants, **Anthony Minor, Tilisha Morrison, Katrina Thomas, Kario Butler, Karen Mendoza, Cyrus Pritchett, Jamilah Karriem** and an individual known to the Grand Jury as S.C., knowingly and willfully engaged in a conspiracy with each other, and others known and unknown to the Grand Jury (collectively known as the co-conspirators), to steal and utilize the personal identifying information from unsuspecting victims and then use the stolen personal identifying information to obtain things of value, access victims' bank accounts, and fraudulently transfer, embezzle, or steal funds.

2. "Personal identifying information" includes all means of identification such as any name or number that may be used alone or with other information to identify a

specific individual, including name, address, social security number, date of birth, account numbers, as well as any other unique personal identifying information.

3. The Federal National Mortgage Association (Fannie Mae) is a government-sponsored enterprise chartered by Congress with a mission to provide liquidity, stability, and affordability to the United States housing and mortgage markets. Fannie Mae is located at 3900 Wisconsin Avenue, NW in Washington, D.C.

4. Bank of America was a financial institution as defined in Title 18, United States Code, Section 20, and its deposits were insured by the Federal Deposit Insurance Corporation (FDIC).

5. JP Morgan Chase was a financial institution as defined in Title 18, United States Code, Section 20, and its deposits were insured by the FDIC.

6. Both Bank of America and JP Morgan Chase allowed their customers to contact them by telephone to update their accounts and conduct banking transactions. For example, a customer could call to enroll in online banking, to change his or her mailing address, to open new accounts, or to transfer funds between existing accounts. Customers with online banking access could conduct banking transactions via the internet, including transferring funds between existing accounts.

7. Defendant **Anthony Minor** resided in Cedar Hill, Texas.

8. Defendant **Tilisha Morrison** resided in Dallas, Texas.

9. Defendant **Katrina Thomas** resided in Garland, Texas. Thomas was employed by Fannie Mae as an Underwriting Support Specialist between on or about November 30, 2009 and on or about October 14, 2011.

10. Defendant **Kario Butler** resided in Mansfield, Texas.
11. Defendant **Karen Mendoza** resided in Dallas and Wichita Falls, Texas.
12. Defendant **Cyrus Pritchett** resided in Dallas, Texas.
13. Defendant **Jamilah Karriem** resided in Dallas and Desoto, Texas.
14. An individual known to the Grand Jury as S.C. resided in Lancaster, Texas.

COUNT ONE

Conspiracy to Commit Bank Fraud
[Violation of 18 U.S.C. §§ 1349 (18 U.S.C. §§ 1344) and 2]

15. The Grand Jury hereby adopts, realleges and incorporates herein all allegations set forth in the Introduction of this first superseding indictment as if fully set forth herein.

16. Beginning in or about October 2009, and continuing through in or about July 2013, the exact dates being unknown to the Grand Jury, in the Dallas Division of the Northern District of Texas, and elsewhere, defendants **Anthony Minor, Tilisha Morrison, Katrina Thomas, Kario Butler, Karen Mendoza, Cyrus Pritchett, and Jamilah Karriem** did knowingly, intentionally and willfully combine, conspire, confederate and agree with each other and others known and unknown to the Grand Jury to commit bank fraud, that is to obtain money in the custody and control of Bank of America and JP Morgan Chase, whose deposits were insured by the FDIC, by means of materially false and fraudulent pretenses and representations, in violation of 18 U.S.C. § 1349.

Manner and Means of Conspiracy

17. It was part of the conspiracy that **Minor, Morrison, Thomas, Butler, Mendoza, Pritchett, and Karriem** along with others known and unknown to the Grand Jury, fraudulently obtained the stolen personal identifying information for true Bank of America and JP Morgan Chase account holders (the victim-customers) and used this information to fraudulently access funds contained in their existing bank accounts, in the following manner, among others:

a. The co-conspirators obtained the personal identifying information of victims in a variety of ways, including:

i. **Thomas**, through her employment at Fannie Mae and through her access to customer files, stole the personal identifying information of approximately 1,100 Fannie Mae customers. **Thomas** accessed customer files and after identifying personal identifying information, wrote down the names, dates of birth, and social security numbers of Fannie Mae customers. She then removed the personal identifying information from her workplace, knowing that this was against Fannie Mae policy and procedure. **Thomas** then sold or provided the stolen personal identifying information to **Minor or Morrison**. **Thomas** knew that this was illegal and she knew that the stolen personal identifying information would be used to commit bank fraud.

b. **Minor** and **Morrison** recruited co-conspirators (the “runners”), including, but not limited to **Butler, Mendoza, Pritchett, and Karriem** who would either use their own existing bank account or would allow their identities to be used to create new bank accounts to further the scheme.

c. The co-conspirators created false identities using the stolen personal identifying information.

d. Using Bank of America’s and JP Morgan Chase’s telephone and online banking systems and the stolen personal identifying information of a victim-customer,

Minor and **Morrison**, and others known and unknown to the Grand Jury, then either directly accessed the victim-customer's account or opened a joint account in the names of the runner and the victim-customer, without the victim-customer's knowledge or consent.

e. Using Bank of America's and JP Morgan Chase's telephone and online banking systems, **Minor** and **Morrison**, and others known and unknown to the Grand Jury, transferred funds from the compromised victim-customer's account into an account controlled by one of the co-conspirators.

f. **Minor** and/or **Morrison** then directed the runner to withdraw the victim-customer's money from the account. **Minor** often drove the runner to the bank or automated teller machine to perform this transaction.

g. **Minor** promised to pay runners for their participation in the scheme.

h. The scheme enriched the co-conspirators in a variety of ways through the use of stolen funds or stolen personal identifying information, including

i. the rental of hotel rooms;

ii. the purchase of luxury goods; and

iii. the withdrawal and use of stolen funds from the accounts controlled by the co-conspirators.

i. The defendants acted with a specific intent to defraud Bank of America, JP Morgan Chase, and the victim-customers and the defendant's actions placed Bank of America and JP Morgan Chase at risk of financial loss.

Overt Acts

18. In furtherance of the conspiracy and to effect the objects thereof, **Minor, Morrison, Thomas, Butler, Mendoza, Pritchett, and Karriem** along with others known and unknown to the Grand Jury, committed and caused to be committed the following overt acts, among others, in the Northern District of Texas, and elsewhere:

Fannie Mae Customers

a. Beginning in or about October 2009 and continuing until in or about October 2011, while an employee of Fannie Mae, **Thomas**, used her access to customer information and files, to improperly obtain and steal the personal identifying information of approximately 1,100 Fannie Mae customers.

b. **Thomas** sold or provided this information to **Minor** and **Morrison** in exchange for the promise of money or other things of value.

Bank Account Takeovers

c. Between in or about April 2011 and in or about July 2011, co-conspirators used stolen personal identifying information to perform numerous bank account takeovers of unsuspecting victims at Bank of America and JP Morgan Chase Bank.

d. On or about June 27, 2011, **Morrison**, using stolen personal identifying information she had obtained from **Minor**, accessed the JP Morgan Chase bank account of an individual known to the Grand Jury as M.V. **Minor** and **Morrison** then created a secondary bank account that was linked to M.V.'s bank account without M.V.'s knowledge, permission, or authorization. **Minor** and **Morrison** then transferred

approximately \$900 in funds out of M.V.'s bank account and into the account that had been created by **Minor** and **Morrison**. **Minor** and **Morrison** subsequently withdrew these funds from the secondary account for their own personal use. **Morrison** knew that she did not have permission or authorization to access or transfer funds out of the accounts of M.V. **Morrison** also knew that she was only able to access these accounts through the use of stolen personal identifying information.

e. On or about October 30, 2009, **Butler**, using stolen personal identifying information he had obtained from **Minor** and **Morrison**, who had obtained the same information from **Thomas**, accessed the Bank of America account of individuals known to the Grand Jury as N.C. and M.C. **Butler** transferred and withdrew approximately \$4,000 from an account belonging to N.C. and M.C. **Butler** subsequently attempted to withdraw other funds from the accounts of other individuals, known to the Grand Jury as K.Z. and M.S., once again through the use of stolen personal identifying information he had obtained from **Minor** and **Morrison**. **Butler** knew that he did not have permission or authorization to access or transfer funds out of the accounts of (1) N.C. and M.C., (2) K.Z., and (3) M.S. **Butler** also knew that he was only able to access these accounts through the use of stolen personal identifying information.

f. On or about December 1, 2009, **Mendoza**, using stolen personal identifying information she had obtained from **Minor** and **Morrison**, accessed the Bank of America account of an entity known to the Grand Jury as F.C. **Mendoza** attempted to transfer and withdraw approximately \$10,000 out of F.C.'s account and into her account. **Mendoza** knew that she did not have permission or authorization to access or transfer

funds out of the accounts of F.C. **Mendoza** also knew that she was only able to access these accounts through the use of stolen personal identifying information.

g. On or about October 5, 2009, **Pritchett**, using stolen personal identifying information he had obtained from **Minor** and **Morrison**, accessed the Bank of America account of individuals known to the Grand Jury as A.C. and V.C. **Pritchett** transferred approximately \$10,000 out of A.C.'s and V.C.'s account and into his account. **Pritchett** then withdrew approximately \$5,300 of the stolen funds. **Pritchett** knew that he did not have permission or authorization to access or transfer funds out of the accounts of A.C. and V.C. **Pritchett** also knew that he was only able to access these accounts through the use of stolen personal identifying information.

h. On or about June 17, 2011, **Karriem**, using stolen personal identifying information she had obtained from **Minor** and **Morrison**, who had obtained the same information from **Thomas**, accessed the JP Morgan Chase bank account of individual known to the Grand Jury as A.L. **Karriem** transferred and withdrew approximately \$1,000 from an account belonging to A.L. **Karriem** knew that she did not have permission or authorization to access or transfer funds out of the accounts of A.L. **Karriem** also knew that he was only able to access these accounts through the use of stolen personal identifying information.

i. On or about June 23, 2011, S.C., using stolen personal identifying information she had obtained from **Morrison** accessed the JP Morgan Chase account of an individual known to the Grand Jury as A.H. On or about June 24, 2011, S.C. withdrew approximately \$1,000 out of A.H.'s account. She provided a portion of the

proceeds to **Morrison** and kept the remainder for herself. S.C. and **Morrison** knew that S.C. did not have permission or authorization to access or transfer funds out of the accounts of A.H. or otherwise obtain these funds. S.C. and Morrison also knew that she was only able to access these accounts through the use of stolen personal identifying information.

j. In or about June 2013, **Minor** created a counterfeit check in the amount of \$17,280.00 using the stolen personal identifying information of individuals known to the Grand Jury as S.L. and D.P.

k. On or about June 27, 2013, **Minor** provided the counterfeit check in the amount of \$17,280.00 to **Morrison**. **Morrison** deposited the fraudulent check into the account of a co-conspirator, known to the Grand Jury as D.K.

l. On or about June 28, 2013, D.K., or someone using her bank account, made three withdrawals, totaling over \$1,000.00 from the account to which the counterfeit check had been deposited.

W Hotel

m. In or about July 2013, **Minor** rented room 817 at the W Hotel in Dallas, Texas for several days, using the means of identification and Bank of America account of an individual known to the Grand Jury as C.G. **Minor** was in possession of a copy of C.G.'s driver's license and Bank of America card. **Minor** did not have the permission or authorization of C.G. to use C.G.'s personal identifying information.

n. While at the W Hotel, **Minor** contacted Bank of America via telephone and changed information on C.G.'s account without the permission or authorization of C.G.

o. While at the W Hotel, **Minor** was in possession of the personal identifying information of several individuals without the permission or authorization of those same individuals.

p. **Minor** was also in possession of several false identities and counterfeit checks.

q. **Minor** was also in possession of a computer containing a template for Texas Department of Public Safety Temporary Driver's License and counterfeit checks.

r. Following law enforcement's seizure of this computer, **Minor** asked **Morrison** to attempt to recover this same computer from law enforcement authorities by claiming that the computer was hers so that it would not be searched by law enforcement officials.

All in violation of 18 U.S.C. §§ 1349 and 2.

COUNTS TWO THROUGH EIGHT
Bank Fraud, Aiding and Abetting
[Violations of 18 U.S.C. §§ 1344 and 2]

19. The allegations contained in paragraphs 1 through 18 are realleged and fully incorporated herein.

20. On or the dates enumerated below, in the Dallas Division of the Northern District of Texas, the defendants **Anthony Minor, Tilisha Morrison, Kario Butler, Karen Mendoza, and Cyrus Pritchett** (as indicated in the chart below), aided and abetted by each other, did knowingly devise and execute the foregoing scheme and artifice to defraud and to obtain money, funds, credits, assets, securities, and other property owned by, and under the custody or control of the financial institutions listed below, whose deposits were insured by the FDIC, by means of materially false and fraudulent pretenses, representations, and promises.

Count	Date	Defendant(s)	Financial Institution	From Legitimate Bank Account	To Account	Amount
2	6/27/2011	Minor Morrison	J.P. Morgan Chase	M.V. (XX6072)	Morrison (XX6072)	\$900
3	7/5/2013	Minor	Bank of America	C.G. (XX7791)	Used to pay for hotel expenses	\$3,125
4	10/20/2009	Butler Minor	Bank of America	N.C. and M.C. (XX4421)	Butler (XX3119)	\$4,000
5	12/1/2009	Mendoza Minor	Bank of America	F.C. (XX3599)	Mendoza (0150)	\$10,000
6	10/5/2009	Pritchett Minor	Bank of America	A.C. and V.C. (XX4903)	Pritchett (XX0957)	\$10,000
7	6/27/2013	Minor Morrison	Bank of America	S.L. and D.P. (XX1159)	D.K. (XX5820)	\$17,280
8	6/17/2011	Karriem Morrison	J.P. Morgan Chase	A.L. (XX8421)	Karriem (XX4970)	\$1,000

All in violation of 18 U.S.C. §§ 1344 and 2.

COUNT NINE

Conspiracy to Commit Fraud and Related Activity in Connection with Identification Documents, Authentication Features, and Information and Aiding and Abetting
[Violation of 18 U.S.C. §§ 1028(a)(7) and (f) and 2]

21. The allegations contained in paragraphs 1 through 20 are realleged and fully incorporated herein.

22. In or about October 2011, in the Northern District of Texas, the defendants, **Anthony Minor, Tilisha Morrison, and Katrina Thomas** did knowingly transfer, possess, and use in or affecting interstate or foreign commerce, without lawful authority, a means of identification of another person, to wit, the names, addresses, social security numbers, dates of birth, and bank account information of approximately 1,100 Fannie Mae customers, including, but not limited to D.V., M.V., W.O., L.O., E.J., and N.C., with the intent to commit, or to aid or abet, or in connection with, any unlawful activity that constitutes a violation of Federal law, to wit, bank fraud, in violation of 18 U.S.C. § 1344.

23. The offense involved the transfer, possession, or use of one or more means of identification and, as a result of the offense, the defendant or any other individual committing the offense, obtained anything of value aggregating \$1,000 or more during any 1-year period.

All in violation of 18 U.S.C. §§ 1028(a)(7) and (f) and 2.

COUNT TEN

Producing, Using, or Trafficking in a Counterfeit Access Device
[18 U.S.C. §§ 1029(a)(1) and 2]

24. The allegations contained in paragraphs 1 through 23 are realleged and fully incorporated herein.

25. On or about June 28, 2013, unidentified co-conspirators burglarized a furniture store in Farmers Branch, Texas and stole a safe which contained, among other things, the means of identification (a passport, social security card, and birth certificate) of a person known to the Grand Jury as A.P.

26. On or about July 1, 2013, **Morrison** used the stolen means of identification of A.P. in an effort to rent an apartment in Mesquite, Texas. **Morrison** was in possession of A.P.'s means of identification and was also in possession of a false identity containing A.P. name and **Morrison's** picture. **Morrison** did not have the permission or authorization of A.P. to use A.P.'s means of identification.

27. Between on or about June 28, 2013, through on or about July 1, 2013, in the Dallas Division of the Northern District of Texas and elsewhere, the defendant **Tilisha Morrison** knowingly and with intent to defraud, used and trafficked in a counterfeit driver's license, which is a counterfeit access device, with said use and trafficking affecting interstate commerce.

All in violation of 18 U.S.C. §§ 1029(a)(1) and 2.

COUNT ELEVEN

Using or Trafficking in an Unauthorized Access Device
[18 U.S.C. §§ 1029(a)(2) and 2]

28. The allegations contained in paragraphs 1 through 27 are realleged and fully incorporated herein.

29. On or about July 8, 2013, in the Dallas Division of the Northern District of Texas and elsewhere, the defendant **Anthony Minor** did knowingly and with intent to defraud, used and trafficked in a stolen credit card and a stolen driver's license, which are unauthorized access devices, and by such conduct, from on or about July 1, 2013, and ending on or about July 8, 2013, obtained an aggregate amount of at least \$3,112.35, with said use and trafficking affecting interstate commerce.

All in violation of 18 U.S.C. §§ 1029(a)(2) and 2.

COUNTS TWELVE AND THIRTEEN

Aggravated Identity Theft

[Violation of 18 U.S.C. §§ 1028A and 2]

30. The allegations contained in paragraphs 1 through 29 are realleged and fully incorporated herein.

31. On or about June 8, 2013, in the Dallas Division of the Northern District of Texas, the defendant **Anthony Minor** did knowingly transfer, possess, and use without lawful authority, the means of identification of other persons, during and in relation to a conspiracy to commit bank fraud, and fraud and related activity in connection with identification documents, authentication features, and information. For each count below, the defendant, without authorization, possessed the name and personal identification information of each individual identified below:

Count	Initials of Individual Whose Identity was Subject to Theft
11	C.G.
12	A.G.

All in violation of §§ 1028(A) and 2.

NOTICE OF FORFEITURE

[18 U.S.C. § 982(a)(2)(A); 18 U.S.C. § 982(a)(2)(B); 18 U.S.C. § 1028(b)(5); 18 U.S.C. § 1029(c)(1)(C)]

Upon conviction for any of the offenses alleged in Counts One through Seven and pursuant to Title 18, United States Code, Section 982(a)(2)(A), the defendants, **Anthony Minor, Tilisha Morrison, Katrina Thomas, Kario Butler, Karen Mendoza, Cyrus Pritchett, and Jamilah Karriem** shall forfeit to the United States any property, real or personal, constituting or derived from proceeds obtained directly or indirectly as a result of the respective offense.

Upon conviction for the offense alleged in Count Eight and pursuant to Title 18, United States Code, Sections 982(a)(2)(B) and 1028(b)(5), the defendants, **Anthony Minor, Tilisha Morrison, and Katrina Thomas** shall forfeit to the United States any property, real or personal, constituting or derived from proceeds obtained directly or indirectly as a result of the offense, as well as any property and any personal property used or intended to be used to commit the offense.

Upon conviction for any of the offenses alleged in Counts Nine and Ten and pursuant to 18 U.S.C. §§ 982(a)(2)(B) and 1029(c)(1)(C), the defendants, **Anthony Minor and Tilisha Morrison**, shall forfeit to the United States any property, real or personal, constituting or derived from proceeds obtained directly or indirectly as a result of the respective offense and any property and any personal property used or intended to be used to commit the respective offense.

This property includes, but is not limited to, the following:


1. The 2006 BMW 750I, VIN WBAHL83586DT01470, registered to Anthony Minor.

If the property subject to forfeiture, as a result of any act or omission of any defendant, cannot be located upon the exercise of due diligence; has been transferred or sold to, or deposited with, a third party; has been placed beyond the jurisdiction of the court; has been substantially diminished in value; or has been commingled with other property that cannot be subdivided without difficulty, it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. § 982(b), to seek to forfeit any other property of that defendant up to the value of the forfeitable property.

A TRUE BILL


FOREPERSON

SARAH R. SALDAÑA
UNITED STATES ATTORNEY



P.J. MEITL
Assistant United States Attorney
District of Columbia Bar No. 502391
Virginia Bar No. 73215
1100 Commerce Street, Third Floor
Dallas, Texas 75242-1699
Telephone: 214.659.8680
Facsimile: 214.659.8812
Email: philip.meitl@usdoj.gov

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

THE UNITED STATES OF AMERICA

v.

ANTHONY MINOR (1), TILISHA MORRISON (2)
KATRINA THOMAS (3), KARIO BUTLER (4)
KAREN MENDOZA (5), CYRUS PRITCHETT (6)
JAMILAH KARRIEM (7)

SEALED SUPERSEDING INDICTMENT

18 U.S.C. §§ 1349 (18 U.S.C. §§ 1344) and 2
Conspiracy to Commit Bank Fraud

18 U.S.C. §§ 1344 and 2
Bank Fraud, Aiding and Abetting

18 U.S.C. §§ 1028(a)(7) and (f) and 2
Conspiracy to Commit Fraud and Related Activity in Connection with Identification
Documents, Authentication Features, and Information and Aiding and Abetting

18 USC §§ 1029(a)(1) and 2
Producing, Using, or Trafficking in a Counterfeit Access Device

18 USC §§ 1029(a)(2) and 2
Using or Trafficking in an Unauthorized Access Device

18 U.S.C. §§ 1028A and 2
Aggravated Identity Theft

18 U.S.C. § 982(a)(2)(A); 18 U.S.C. § 982(a)(2)(B); 18 U.S.C. § 1028(b)(5);
18 U.S.C. § 1029(c)(1)(C)
Forfeiture Notice

13 Counts

A true bill rendered

DALLAS

Angela Beard

FOREPERSON

Filed in open court this 23 day of January, 2014.

Clerk

Minor (1) is in federal custody; and Morrison (2) is on bond; **Warrants to be Issued for Karen Mendoza (5) & Cyrus Pritchett (6);** Katrina Thomas (3), Kario Butler (4), and Jamilah Karriem (7) will self-surrender;

UNITED STATES DISTRICT/MAGISTRATE JUDGE

Criminal Case: 3:13-CR-415-L