

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	CRIMINAL NO. 14-315
v.	:	DATE FILED: December 18, 2014
ADOLPHUS WILLIAM CATO,	:	VIOLATIONS:
a/k/a "Bill,"	:	18 U.S.C. § 371 (conspiracy - 1 count)
JARED HAYES	:	18 U.S.C. § 1344 (bank fraud- 7 counts)
SEAN FINN,	:	18 U.S.C. § 1028A(a)(1)(aggravated
a/k/a "Po,"	:	identity theft- 2 counts)
RUSHAWN WOODALL	:	18 U.S.C. § 1029(a)(2) (use of counterfeit
LEONARD HERRINGTON	:	and unauthorized access devices – 3
WARREN MOORE	:	counts)
MICHAEL ROSS	:	18 U.S.C. § 2 (aiding and abetting)
QUANDA ANTHONY	:	Notice of Forfeiture
ZABRINA JOBE	:	
	:	

SECOND SUPERSEDING INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

1. At all times material to this indictment, Third Fed Bank, TD Bank, Santander Bank, PNC Bank, and M&T Bank, were financial institutions whose deposits were insured by the Federal Deposit Insurance Corporation. Andrews Credit Union was a financial institution whose deposits were insured by the National Credit Union Administration.
2. At all times material to this indictment, Capitol One was a financial institution whose business affects interstate commerce.
3. From in or about October 2013, to in or about May 2014, in the Eastern District of Pennsylvania, the District of New Jersey, and elsewhere, defendants

**ADOLPHUS WILLIAM CATO,
a/k/a "Bill,"
JARED HAYES,
SEAN FINN,
a/k/a "Po,"
RUSHAWN WOODALL,
LEONARD HERRINGTON,
WARREN MOORE,
MICHAEL ROSS,
QUANDA ANTHONY and
ZABRINA JOBE**

conspired and agreed, together and with others known and unknown to the grand jury, to commit offenses against the United States, that is, to knowingly execute and attempt to execute a scheme to defraud, Third Fed Bank, TD Bank, Santander Bank, PNC Bank, and M&T Bank, and obtain funds by false pretenses, representations, and promises in violation of Title 18 United States Code, Section 1344; and to knowingly and with intent to defraud, use one or more unauthorized access devices to obtain things of value aggregating \$1,000 or more during a one-year period, thereby affecting interstate commerce, in violation of Title 18, United States Code, Section 1029(a)(2).

MANNER AND MEANS

It was part of the conspiracy that:

4. Defendant ADOLPHUS WILLIAM CATO manufactured and obtained fraudulent drivers licenses utilizing the personal identifying information of victims without their knowledge or consent.

5. Defendant JARED HAYES obtained valid checks from businesses and personal bank accounts from individuals known and unknown to the grand jury. Defendant JARED HAYES took the information from the valid checks and produced counterfeit checks.

6. Individuals known and unknown to the grand jury applied for bank loans online utilizing the personal identifying information of victims without their knowledge or consent.

7. Defendants SEAN FINN, RUSHAWN WOODALL AND LEONARD HERRINGTON, at the direction of defendants ADOLPHUS WILLIAM CATO and JARED HAYES recruited and directed individuals, including defendants WARREN MOORE, MICHAEL ROSS, QUANDA ANTHONY, ZABRINA JOBE, Michael Jaje charged elsewhere, and others known and unknown to the grand jury, to obtain money from various financial institutions by cashing counterfeit checks and obtaining the proceeds of fraudulent loans using counterfeit identifications and checks provided by defendants ADOLPHUS WILLIAM CATO and JARED HAYES.

8. Defendants RUSHAWN WOODALL and WARREN MOORE used unauthorized and counterfeit access devices and fraudulent identification provided by defendants ADOLPHUS WILLIAM CATO and JARED HAYES to obtain automobiles from car rental businesses and hotel lodging.

OVERT ACTS

In furtherance of the conspiracy, defendants ADOLPHUS WILLIAM CATO, JARED HAYES, SEAN FINN, RUSHAWN WOODALL, LEONARD HERRINGTON, WARREN MOORE, MICHAEL ROSS, QUANDA ANTHONY, and ZABRINA JOBE committed the following overt acts, among others, in the Eastern District of Pennsylvania, the District of New Jersey, and elsewhere:

Third Fed Bank Fraud

On or about November 12, 2013:

1. Defendants JARED HAYES and WARREN MOORE, cashed a counterfeit “Allstate Used Cars” check in the name “R.C.” in the amount of \$1450.00 using fraudulent identification in the name “R.C.” at the Third Fed Bank branch located in Roebling, New Jersey.

2. Defendants JARED HAYES and MICHAEL ROSS, cashed a counterfeit “Allstate Used Cars” check in the name “M.W.” in the amount of \$1256.31 using fraudulent identification in the name “M.W.” at the Third Fed Bank branch located in Westampton, New Jersey.

TD Bank Fraud

3. On or about November 19, 2013, defendants ADOLPHUS WILLIAM CATO and SEAN FINN, cashed two counterfeit “JP Mt. Holly LLC-Friendly’s Payroll” checks in the name “A.B.” in the aggregate amount of \$1853.46 using fraudulent identification in the name “A.B.” at two TD Bank branches located in Cherry Hill, New Jersey.

4. On or about December 2, 2013, defendants ADOLPHUS WILLIAM CATO, SEAN FINN, and another individual known to the grand jury cashed four counterfeit “Beauty Enterprises, LLC” checks in the name “W.B.” in the aggregate amount of approximately \$ 2769.92 at four TD Bank branches located in Sicklerville, Williamstown and Cherry Hill, New Jersey.

5. On or about December 22, 2013, defendants JARED HAYES and

MICHAEL ROSS, cashed a counterfeit “Northgate Realty” check in the name “E.A.” in the amount of \$1970.00 using fraudulent identification in the name “E.A.” at a TD Bank branch located in Cinnaminson, New Jersey.

6. On or about December 22, 2013, defendants ADOLPHUS WILLIAM CATO, JARED HAYES, SEAN FINN and another individual known to the grand jury, cashed a counterfeit “Northgate Realty” check in the name “P.C.” in the amount of \$1496.23 using fraudulent identification in the name “P.C.” at a TD Bank branch located in Mount Laurel, New Jersey.

7. On or about and between May 19 and May 22, 2014, defendants ADOLPHUS WILLIAM CATO, QUANDA ANTHONY, and other individuals known and unknown to the grand jury, using counterfeit identification in the name of victim “E.H.,” obtained \$9,850.00 from a fraudulently obtained bank loan in the name of victim “E.B.,” at a TD Bank branch located in Stratford, New Jersey.

Santander Bank Fraud

8. On or about and between December 30 and December 31, 2013, defendant MICHAEL ROSS, using counterfeit identification in the name of victim “J.Y.,” obtained \$15,000 of a \$17,500 a fraudulently obtained bank loan in the name of victim “J.Y.,” at three Santander Bank branches located in Langhorne, Yardley and Bensalem, Pennsylvania.

9. On or about and between January 9 and January 13, 2014, defendant MICHAEL ROSS, using counterfeit identification in the name of victim “E.A.,” obtained \$15, 010 of a \$25,000 fraudulently obtained bank loan in the name of victim “E.A.,” at two Santander Bank branches located in Cherry Hill and Pennsauken, New Jersey.

10. On or about and between February 19 and 20, 2014, defendants ADOLPHUS WILLIAM CATO, LEONARD HERRINGTON, ZABRINA JOBE and Michael Jaje, charged elsewhere, using counterfeit identification in the name of victim “M.B.,” attempted to obtain \$17,500 from a fraudulently obtained loan in the name of victim “M.B.,” at a Santander Bank branch located in West Chester, Pennsylvania.

PNC Bank Fraud

11. On or about October 2, 2013, defendant JARED HAYES and another individual unknown to the grand jury cashed a counterfeit “Broadway Moving and Storage” check in the name “A.B.” in the amount of \$1497.39 using fraudulent identification in the name “A.B.” at a PNC Bank branch located in Yardley, Pennsylvania.

12. On or about December 5, 2013, defendant JARED HAYES and another individual unknown to the grand jury cashed a counterfeit check from the personal checking account of “A.L.” in the name “R.C.” in the amount of \$750.00 using fraudulent identification in the name “R.C.” at a PNC Bank branch located in Marlton, New Jersey.

13. On or about December 6, 2013, defendant JARED HAYES and another individual unknown to the grand jury cashed a counterfeit check from the personal checking account of “A.L.” in the name “R.C.” in the amount of \$750.00 using fraudulent identification in the name “R.C.” at a PNC Bank branch located in Cherry Hill, New Jersey.

14. On or about February 28, 2014, defendants JARED HAYES and WARREN MOORE, cashed a counterfeit “Bridgewater Acura” check in the name “M.G.” in the amount of \$1400.00 using fraudulent identification in the name “M.G.” at a PNC Bank branch located in Cherry Hill, New Jersey.

On or about March 1, 2014:

15. Defendants JARED HAYES and WARREN MOORE, cashed a counterfeit “Bridgewater Acura” check in the name “M.G.” in the amount of \$1483.00 using fraudulent identification in the name “M.G.” at a PNC Bank branch located in Haddonfield, New Jersey.

16. Defendants JARED HAYES and WARREN MOORE, cashed a counterfeit “Bridgewater Acura” check in the name “K.J.” in the amount of \$1491.73 using fraudulent identification in the name “K.J.” at a PNC Bank branch located in Cherry Hill, New Jersey.

On or about March 3, 2014

17. Defendants JARED HAYES and WARREN MOORE, cashed a counterfeit “Bridgewater Acura” check in the name “M.G.” in the amount of \$1493.36 using fraudulent identification in the name “M.G.” at a PNC Bank branch located in Merchantville, New Jersey.

18. Defendants JARED HAYES and WARREN MOORE, cashed a counterfeit “Bridgewater Acura” check in the name “K.J.” in the amount of \$1490.00 using fraudulent identification in the name “K.J.” at a PNC Bank branch located in Stratford, New Jersey.

19. Defendants JARED HAYES, RUSHAWN WOODALL, and WARREN MOORE, cashed a counterfeit “Bridgewater Acura” check in the name “J.B.” in the amount of \$1475.91 using fraudulent identification in the name “J.B.” at a PNC Bank branch located in Yardley, Pennsylvania.

Wells Fargo Bank Fraud

20. On or about December 12, 2013, defendant MICHAEL ROSS, using counterfeit identification in the name of victim "M.D.," obtained \$6000.00 from a fraudulently obtained bank loan in the name of victim "M.D.," at a Wells Fargo Bank branch located in Sicklerville, New Jersey.

21. On or about December 24, 2013, defendant MICHAEL ROSS, using counterfeit identification in the name of victim "J.Y.," obtained \$8000.00 from a fraudulently obtained bank loan in the name of victim "J.Y.," at a Wells Fargo Bank branch located in Langhorne, Pennsylvania.

22. On or about March 11, 2014, defendants ADOLPHUS WILLIAM CATO and ZABRINA JOBE, using counterfeit identification in the name of victim "S.B.," obtained \$24,921.62 from a fraudulently obtained bank loan in the name of victim "S.B.," at a Wells Fargo Bank branch located in Runnemede, New Jersey.

23. On or about March 13, 2014, defendants ADOLPHUS WILLIAM CATO and ZABRINA JOBE, using counterfeit identification in the name of victim "R.R.," attempted to obtain \$40,000 from a fraudulently obtained loan in the name of victim "R.R.," at a Wells Fargo Bank branch located in Cinnaminson, New Jersey.

Andrew Credit Union Fraud

24. On or about May 8, 2014, defendants ADOLPHUS WILLIAM CATO, QUANDA ANTHONY, and individuals unknown to the grand jury, using counterfeit identification in the name of victim "T.S.," obtained \$25,000 from a fraudulently obtained bank loan in the name of victim "T.S.," at a Andrews Credit Union branch located in Burlington, New

Jersey.

M&T Bank Fraud

25. On or about May 21, 2014, defendants ADOLPHUS WILLIAM CATO, QUANDA ANTHONY, and individuals unknown to the grand jury, using counterfeit identification in the name of victim “E.H.,” obtained \$24,000 from a fraudulently obtained bank loan in the name of victim “E.H.,” at a M&T Bank branch located in Philadelphia, Pennsylvania.

Access Device Fraud

26. On or about December 31, 2013, defendants JARED HAYES and WARREN MOORE, used a counterfeit access device in the name “R.C.,” utilizing fraudulent identification in the name “R.C.” to obtain a 2014 Toyota Camry, valued at approximately \$15,000.00, from Bennett Toyota located in Allentown, Pennsylvania.

27. On or about February 8, 2014, defendants JARED HAYES and RUSHAWN WOODALL, used a unauthorized access device in the name “J.B.,” utilizing fraudulent identification in the name “J.B.,” to obtain a 2013 Hyundai Santa Fe, valued at approximately \$24,477.00, from Auto Rent located in Doylestown, Pennsylvania.

28. On or about March 18, 2014, defendants JARED HAYES, RUSHAWN WOODALL, and WARREN MOORE, used a unauthorized access device in the name “J.B.,” utilizing fraudulent identification in the name “J.B.,” to obtain a 2014 Ford Escape, valued at approximately 20,000, from Avis/Budget Car Rental located in Mount Laurel, New Jersey.

All in violation of Title 18, United States Code, Section 371.

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 12, 2013, in the District of New Jersey, defendants

**JARED HAYES,
WARREN MOORE, and
MICHAEL ROSS**

knowingly executed, and attempted to execute, and aided and abetted in the execution of, a scheme to defraud Third Fed Bank, a bank insured by the Federal Deposit Insurance Corporation (FDIC), and to obtain monies owned by and under the care, custody and control of Third Fed Bank by means of false and fraudulent pretenses, representations and promises.

THE SCHEME

Paragraphs 1 and 4 through 8, and Overt Acts 1 and 2 are incorporated here.

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

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

From on or about November 19, 2013, to on or about May 22, 2014, in the District of New Jersey, defendants

**ADOLPHUS WILLIAM CATO,
a/k/a "Bill,"
JARED HAYES,
SEAN FINN,
a/k/a "Po,"
MICHAEL ROSS and
QUANDA ANTHONY**

knowingly executed, and attempted to execute, and aided and abetted in the execution of, a scheme to defraud TD Bank, a bank insured by the Federal Deposit Insurance Corporation (FDIC), and to obtain monies owned by and under the care, custody and control of TD Bank by means of false and fraudulent pretenses, representations and promises.

THE SCHEME

Paragraphs 1 and 4 through 8, and Overt Acts 3 through 7 are incorporated here.

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

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

From on or about December 20, 2013, to on or about February 20, 2014, in the Eastern District of Pennsylvania, and the District of New Jersey, defendants

**ADOLPHUS WILLIAM CATO,
a/k/a "Bill,"
LEONARD HERRINGTON,
MICHAEL ROSS and
ZABRINA JOBE**

knowingly executed, and attempted to execute, and aided and abetted in the execution of, a scheme to defraud Santander Bank, a bank insured by the Federal Deposit Insurance Corporation (FDIC), and to obtain monies owned by and under the care, custody and control of Santander Bank by means of false and fraudulent pretenses, representations and promises.

THE SCHEME

Paragraphs 1 and 4 through 8, and Overt Acts 8 through 10 are incorporated here.

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

COUNT FIVE

THE GRAND JURY FURTHER CHARGES THAT:

From on or about October 2, 2013, to on or about March 3, 2014, in the Eastern District of Pennsylvania, and the District of New Jersey, defendants

**JARED HAYES,
RUSHAWN WOODALL and
WARREN MOORE**

knowingly executed, and attempted to execute, and aided and abetted in the execution of, a scheme to defraud PNC Bank, a bank insured by the Federal Deposit Insurance Corporation (FDIC), and to obtain monies owned by and under the care, custody and control of PNC Bank by means of false and fraudulent pretenses, representations and promises.

THE SCHEME

Paragraphs 1 and 4 through 8, and Overt Acts 11 through 19 are incorporated here.

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

COUNT SIX

THE GRAND JURY FURTHER CHARGES THAT:

From on or about December 12, 2013, to on or about March 13, 2014, in the District of New Jersey, defendants

**ADOLPHUS WILLIAM CATO,
a/k/a "Bill,"
MICHAEL ROSS and
ZABRINA JOBE**

knowingly executed, and attempted to execute, and aided and abetted in the execution of, a scheme to defraud Wells Fargo Bank, a bank insured by the Federal Deposit Insurance Corporation (FDIC), and to obtain monies owned by and under the care, custody and control of Wells Fargo Bank by means of false and fraudulent pretenses, representations and promises.

THE SCHEME

Paragraphs 1 and 4 through 8, and Overt Acts 20, 22, and 23 are incorporated here.

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

COUNT SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about May 8, 2014, in the District of New Jersey, defendants

**ADOLPHUS WILLIAM CATO,
a/k/a "Bill," and
QUANDA ANTHONY**

knowingly executed, and attempted to execute, and aided and abetted in the execution of, a scheme to defraud Andrews Credit Union, a credit union insured by the National Credit Union Administration (NCAU), and to obtain monies owned by and under the care, custody and control of Andrew Credit Union by means of false and fraudulent pretenses, representations and promises.

THE SCHEME

Paragraphs 1 and 4 through 8, and Overt Act 24 are incorporated here.

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

COUNT EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

On or about May 21, 2014, in the Eastern District of Pennsylvania, defendants

**ADOLPHUS WILLIAM CATO,
a/k/a "Bill," and
QUANDA ANTHONY**

knowingly executed, and attempted to execute, and aided and abetted in the execution of, a scheme to defraud M&T Bank, a bank insured by the Federal Deposit Insurance Corporation (FDIC), and to obtain monies owned by and under the care, custody and control of M&T Bank by means of false and fraudulent pretenses, representations and promises.

THE SCHEME

Paragraphs 1 and 4 through 8, and Overt Act 25 are incorporated here.

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

COUNT NINE

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 and 4 through 8 of Count One and Overt Act 10 of Count One are incorporated here.

2. On or about February 20, 2014, in the Eastern District of Pennsylvania, defendants

**ADOLPHUS WILLIAM CATO,
a/k/a “Bill,”
LEONARD HERRINGTON and
ZABRINA JOBE**

knowingly and without lawful authority, possessed and used, and aided and abetted the possession and use of, a means of identification of “M.B.,” that is, the use of the name and personal identifying information of “M.B.,” during and in relation to bank fraud.

In violation of Title 18, United States Code, Sections 1028A (a)(1) and 2.

COUNT TEN

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 and 4 through 8 of Count One and Overt Act 19 of Count One are incorporated here

2. On or about March 3, 2014, in the Eastern District of Pennsylvania, defendants

**JARED HAYES,
RUSHAWN WOODALL and
WARREN MOORE**

knowingly and without lawful authority, possessed and used, and aided and abetted the possession and use, of a means of identification of "J.B.," that is, the use of the name and personal identifying information of "J.B.," during and in relation to bank fraud.

All in violation of Title 18, United States Code, Sections 1028A (a)(1) and 2.

COUNT ELEVEN

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 2 and 4 through 8 of Count One and Overt Act 26 of Count One are incorporated here

2. On or about December 31, 2013, in the Eastern District of Pennsylvania, defendants

**JARED HAYES and
WARREN MOORE**

knowingly and with the intent to defraud used, and aided and abetted and willfully caused the use of, a counterfeit access device, that is, a Capital One Master Card ending in 1833, to obtain things of value aggregating \$1,000 or more during a one-year period, for a total of approximately \$15,000, thereby affecting interstate and foreign commerce.

In violation of Title 18, United States Code, Sections 1029(a)(2) and 2.

COUNT TWELVE

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 2 and 4 through 8 of Count One and Overt Act 27 of Count One are incorporated here
2. On or about February 8, 2014, in the Eastern District of Pennsylvania, defendants

**JARED HAYES and
RUSHAWN WOODALL**

knowingly and with the intent to defraud used, and aided and abetted and willfully caused the use of, an unauthorized access device, that is, a Capital One Master Card ending in 4278, to obtain things of value aggregating \$1,000 or more during a one-year period, for a total of approximately \$24,477, thereby affecting interstate and foreign commerce.

In violation of Title 18, United States Code, Sections 1029(a)(2) and 2.

COUNT THIRTEEN

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 2 and 4 through 8 of Count One and Overt Act 28 of Count One are incorporated here

2. On or about March 18, 2014, in the District of New Jersey, defendants

**JARED HAYES,
RUSHAWN WOODALL and
WARREN MOORE**

knowingly and with the intent to defraud used, and aided and abetted and willfully caused the use of, an unauthorized access device, that is, a Capital One Master Card ending in 4278, to obtain things of value aggregating \$1,000 or more during a one-year period, for a total of approximately \$20,000, thereby affecting interstate and foreign commerce.

In violation of Title 18, United States Code, Sections 1029(a)(2) and 2.

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

1. As a result of the violations of Title 18, United States Code, Sections 371, 1344, and 1029, set forth in this indictment, defendants

**ADOLPHUS WILLIAM CATO,
a/k/a “Bill,”
JARED HAYES,
SEAN FINN,
a/k/a “Po,”
RUSHAWN WOODALL,
LEONARD HERRINGTON,
WARREN MOORE,
MICHAEL ROSS,
QUANDA ANTHONY and
ZABRINA JOBE**

shall forfeit to the United States of America any property that constitutes, or is derived from, proceeds traceable to the commission of such offenses.

2. If any of the property subject to forfeiture, 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 18, United States Code, Section 982(b), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other

property of the defendant(s) up to the value of the property subject to forfeiture.

All pursuant to Title 18, United States Code, Section 982(a)(2)(A) and (B).

A TRUE BILL:

FOREPERSON

**ZANE DAVID MEMEGER
UNITED STATES ATTORNEY**