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**FILED**  
Jan 28, 2021  
CLERK, U.S. DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

7 Attorneys for Plaintiff  
8 United States of America

9 IN THE UNITED STATES DISTRICT COURT  
10 EASTERN DISTRICT OF CALIFORNIA

11 UNITED STATES OF AMERICA,  
12  
13 Plaintiff,  
14 v.  
15 MARQUIS ASAAD HOOPER and  
16 NATASHA RENEE CHALK,  
17 Defendants.

CASE NO. 1:21-cr-00024-NONE-SKO  
18 U.S.C. § 1349 – Conspiracy to Commit Wire  
Fraud (1 COUNT); 18 U.S.C. § 1343 – Wire Fraud  
(13 COUNTS); 18 U.S.C. § 1028A and 18 U.S.C. § 2  
– Aggravated Identity Theft and Aiding and Abetting  
(2 COUNTS); and 18 U.S.C. § 981(a)(1)(C), 28  
U.S.C. § 2461(c) – Criminal Forfeiture

18 INDICTMENT

19 COUNT ONE: [18 U.S.C. § 1349 – Conspiracy to Commit Wire Fraud]

20 The Grand Jury charges:

21 MARQUIS ASSAD HOOPER, and  
22 NATASHA RENEE CHALK,

23 defendants herein, as follows:

24 **I. INTRODUCTION**

25 At all times relevant to this indictment:

26 1. “Personal Identifying Information” or “PII” means information that can be used, alone or  
27 in conjunction with other information, to identify an individual. Types of PII include names, social  
28 security numbers, dates of birth, driver’s license numbers, passport numbers, addresses, and phone

1 numbers.

2           2.       Company #1 owned and operated an online platform that contained the PII of millions of  
3 individuals (hereinafter referred to as the “Database”). Company #1’s customers could access the  
4 database to search for people based on identifying criteria such as name or social security number. From  
5 the results of a search, customers could select a result and run a “Comprehensive Report” containing  
6 detailed information about the individual including PII. This information could include mobile and  
7 landline phone numbers, dates of birth, full social security numbers, current and historical addresses, and  
8 the individual’s possible relatives, neighbors, and associates. After running a Comprehensive Report, a  
9 Company #1 customer could view or download the report onto his computer or device. Legitimate uses  
10 of Comprehensive Reports and the PII contained therein include collections agencies finding current  
11 contact information for debtors, law firms locating witnesses and investigating a defendant’s assets, and  
12 banks authenticating the information customers provide when applying for a new account. Access to the  
13 Database and the search results and reports the Database generated were things of value and the property  
14 of Company #1.

15           3.       Customers of the Company #1 Database included businesses such as collections agencies,  
16 law firms, financial services companies, insurance companies, investigative reporters, and law  
17 enforcement and government agencies. Only legitimate businesses and government agencies were  
18 eligible to open Company #1 Database accounts and access the Database. To verify the legitimacy of a  
19 business or government entity applying for a Database account, and to ensure that the applicant intended  
20 to use the Database only for business- or government-related purposes, Company #1 conducted a  
21 verification process for each new account. This process could include, among other verification steps,  
22 gathering information about the business or agency and determining the reason the business or agency  
23 needed access to the Database.

24           4.       Under two federal statutes, the Gramm-Leach-Bliley Act, 15 U.S.C. §§ 6801 *et seq.*  
25 (“GLBA”), and the Driver’s Privacy Protection Act, 18 U.S.C. § 2721 (“DPPA”), customers could only  
26 access certain information in the Database for specific, enumerated purposes. Each time a customer  
27 logged into the Database, Company #1 required the customer to indicate whether, for each statute, the  
28 customer was accessing the database for one of those purposes or whether the customer had no purpose

1 enumerated in the GLBA or DPPA. For instance, under “GLBA (Gramm-Leach-Bliley Act) Permitted  
2 Use,” the customer could select, “To protect against or prevent actual or potential fraud, unauthorized  
3 transactions, claims, or other liability,” “To comply with Federal, State, or local laws, rules and other  
4 applicable legal requirements,” or “No use permitted by GLBA.” This selection determined the extent to  
5 which the customer was able to access certain information in the Database.

6 5. Each time a customer logged into the Database, Company #1 also required the customer  
7 to click a box next to a paragraph reading, in relevant part, “Further, I understand and agree to the Terms  
8 and Conditions under penalty of perjury. I understand that the misuse of this system may cause  
9 immediate termination of my account as well as full prosecution provided by law.” Unless a customer  
10 clicked the box, the customer could not access the Database. Company #1’s Terms and Conditions for  
11 the Database prohibited customers from disclosing information from the Database to third parties,  
12 including “any analyses, compilations, and reports.”

13 6. The United States Seventh Fleet (the “Seventh Fleet”) was a numbered fleet in the United  
14 States Navy, headquartered in Yokosuka, Kanagawa Prefecture, Japan.

15 7. Digital currencies are electronically sourced units of value that exist on the Internet and  
16 are not stored in a physical form. They are not issued by any government, but instead are generated and  
17 controlled through computer software operating on decentralized peer-to-peer networks. Users of digital  
18 currencies send units of value to and from “addresses,” which are unique strings of numbers and letters  
19 functioning like a public account number. Digital currency transactions are recorded on a publicly  
20 available, distributed ledger, often referred to as a “blockchain.” Because digital currencies are  
21 transferred peer-to-peer, users can avoid traditional, regulated financial institutions, which collect  
22 information about their customers and maintain anti-money laundering and fraud programs.

23 8. The dark web includes internet content accessible only through The Onion Router  
24 (“Tor”) network, which anonymized the Internet Protocol (“IP”) addresses of its underlying servers.  
25 The use of Tor also made it difficult to identify the true physical locations of the website’s  
26 administrators, moderators, and users. Individuals engaged in illegal activity utilized the dark web to  
27 disguise their identity and location and to evade detection.

28 9. Defendant MARQUIS ASAAD HOOPER served in the United States Navy from on or

1 about July 2008 through on or about October 2018. His separation from the Navy became official on or  
2 about October 16, 2018. From on or about January 2017 to on or about September 2018, HOOPER was  
3 assigned to the Seventh Fleet in Japan as an Information System Security Manager. At all times relevant  
4 to the Indictment, HOOPER resided in Japan; in Selma, California, in the State and Eastern District of  
5 California; and elsewhere.

6 10. Defendant NATASHA RENEE CHALK was a United States Navy reservist assigned to  
7 Naval Air Station Lemoore in Lemoore, California, in the State and Eastern District of California.  
8 HOOPER was CHALK's husband. CHALK resided at all relevant times in Selma, California, in the  
9 State and Eastern District of California, and elsewhere.

10 11. K.D. was a United States Navy Petty Officer stationed on the U.S.S. George Washington,  
11 docked in Newport News, Virginia.

12 12. L.B. was a Public Affairs Officer for the Commander Joint Strike Fighter Wing at Naval  
13 Air Station Lemoore, California.

14 **II. THE CONSPIRACY**

15 13. Beginning on a date unknown to the Grand Jury but no later than on or about August  
16 2018 and continuing until on or about May 2019, in the State and Eastern District of California and  
17 elsewhere, defendants MARQUIS ASAAD HOOPER and NATASHA RENEE CHALK knowingly and  
18 intentionally agreed, combined, and conspired with each other, and with others both known and  
19 unknown to the Grand Jury, to execute and attempt to execute by means of wire and radio  
20 communications in interstate and foreign commerce, a material scheme and artifice to defraud Company  
21 #1 and others, and to obtain the assets and other property owned by, and under the custody and control  
22 of, Company #1, including access to the Database, information contained in the Database, and  
23 Comprehensive Reports generated by the Database, including the PII of numerous individuals, by means  
24 of materially false and fraudulent pretenses, representations, and promises, in violation of Title 18,  
25 United States Code, Section 1343.

26 **III. MANNER AND MEANS**

27 In furtherance of the conspiracy, defendants MARQUIS ASAAD HOOPER and NATASHA  
28 RENEE CHALK employed, among others, the following manner and means:

1           14.     Between on or about August 2018 and on or about May 2019, HOOPER, CHALK, and  
2 others both known and unknown to the Grand Jury conspired to obtain access to the COMPANY #1  
3 Database through fraud and false statements, to search for the PII of hundreds of individuals on the  
4 Database, and to obtain property and other things of value from the Database, including Comprehensive  
5 Reports and other information on thousands of individuals.

6           15.     On or about August 16, 2018, HOOPER began the process of opening an account to  
7 access the Database (the "HOOPER Database Account"). HOOPER falsely and fraudulently informed  
8 Company #1 that he was seeking to open the account on behalf of the Seventh Fleet. He also falsely and  
9 fraudulently informed Company #1 that the Seventh Fleet required access to the Database in order to  
10 verify information on Navy personnel. At the time HOOPER made these statements, he knew them to be  
11 false and fraudulent. HOOPER made these statements for the purpose of convincing Company #1 to  
12 complete its account verification process and approve opening of the HOOPER Database Account.  
13 Moreover, at the time HOOPER applied for and obtained access to the HOOPER Database Account,  
14 HOOPER knew that he was about to be separated from the Navy.

15           16.     After receiving this false and fraudulent information, Company #1 approved and  
16 activated the HOOPER Database Account on or about September 6, 2018. After obtaining access to the  
17 Database, HOOPER added CHALK and others as users on the HOOPER Database Account. Thereafter,  
18 between on or about September 6, 2018 and on or about December 18, 2018, HOOPER and CHALK ran  
19 tens of thousands of searches on the Database. From the results of those searches, HOOPER and  
20 CHALK obtained Comprehensive Reports and other information on over nine thousand individuals.  
21 HOOPER and CHALK engaged in this conduct knowing that their access to the Database was based on  
22 false and fraudulent representations made to Company #1. On nearly all occasions that HOOPER and  
23 CHALK accessed the Database, they falsely and fraudulently indicated, as their GLBA permitted use,  
24 that they were accessing the database for fraud prevention and, as their DPPA permitted use, that they  
25 were acting as or on behalf of a government agency in carrying out its functions. HOOPER and CHALK  
26 knew that these statements were false and fraudulent. Moreover, they knew that the Comprehensive  
27 Reports they ran on the database stated, "FOR GOVERNMENT PURPOSES ONLY," on the top and  
28 that HOOPER and CHALK were not using the reports for government purposes.

1 17. One of the purposes for which HOOPER and CHALK ran searches and obtained reports  
2 and other information from the Database was to sell the reports and other information to third parties in  
3 exchange for digital currency including bitcoin, as well as other forms of payment. HOOPER and  
4 CHALK communicated with these third parties through encrypted messaging applications, over the dark  
5 web, and through other means of communication. HOOPER and CHALK solicited and received  
6 payment in digital currency and communicated through encrypted messaging applications and the dark  
7 web for the purposes of avoiding detection and concealing their scheme and identities. HOOPER and  
8 CHALK received digital currency worth at least \$160,000 from third parties in exchange for reports and  
9 other information from the Database on thousands of individuals.

10 18. After receiving reports and other information from the Database from HOOPER and  
11 CHALK, the third parties who received the information used it for a variety of illegal purposes,  
12 including identity theft. For instance, on or about November 19, 2018, HOOPER conducted a search of  
13 T.M. in the Database. On or about November 20, 2018, M.B. presented a fraudulent California driver's  
14 license for T.M., containing PII obtained from HOOPER's search of T.M. in the Database., to bank  
15 teller M.J. at a bank branch in Gilbert, Arizona, seeking to withdraw funds from T.M.'s bank account.  
16 M.J. suspected fraud and declined the transaction.

17 19. HOOPER and CHALK continued to run searches on the Database and to obtain and sell  
18 Comprehensive Reports and other information to third parties following HOOPER's separation from the  
19 Navy in or about October 2018.

20 20. On or about December 18, 2018, Company #1 suspended the HOOPER Database  
21 Account, preventing HOOPER and CHALK from accessing the Database. On or about that same day,  
22 and following the suspension going into effect, HOOPER wrote an email to Company #1 falsely and  
23 fraudulently stating, in relevant part, that the suspension had "ceased all classified account verifications  
24 for U.S. Commander Seventh Fleet." HOOPER signed the email "ITC Hooper." ITC is a Navy acronym  
25 indicating that an individual is an Information Technician Chief Petty Officer in the Navy.

26 21. Beginning on or about March 2019 and continuing until on or about May 8, 2019,  
27 HOOPER and CHALK, working with others including K.D., attempted to regain access to the Database  
28 through additional fraud and false statements. HOOPER instructed and counseled K.D. to falsely and

1 fraudulently apply for a Database account, purportedly on behalf of the U.S.S. George Washington,  
2 purportedly for the purpose of performing background checks on Naval personnel.

3 22. Between on or about March 25, 2019 and on or about May 8, 2019, HOOPER sent K.D.  
4 multiple emails containing messages and attachments. HOOPER instructed K.D. to send the messages  
5 and attachments to Company #1. In creating and sending the messages and attachments, HOOPER and  
6 CHALK conspired with each other and with others known and unknown to the Grand Jury. The  
7 messages and attachments contained false and fraudulent information designed to convince Company #1  
8 to verify and open K.D.'s Database account. K.D. emailed Company #1 each of the messages and  
9 attachments HOOPER emailed to him. The fraudulent statements and attachments included the  
10 following:

11 a) On or about March 28, 2019, HOOPER instructed K.D. to send Company #1 an  
12 email falsely and fraudulently stating that L.B. was K.D.'s Supply Officer. HOOPER attached a  
13 Company #1 "Subscriber Agreement & Application" containing L.B.'s forged signature. On or  
14 about March 29, 2019, K.D. sent the message and attachment to Company #1

15 b) On or about April 22, 2019, HOOPER instructed K.D. to send Company #1 an  
16 email containing a fraudulent driver's license of L.B. and a fraudulent letter, purportedly from  
17 the Commanding Officer of the U.S.S. George Washington, appointing L.B. "Agency Program  
18 Coordinator for the Government-wide Commercial Purchase Card (GCPC) Program." On or  
19 about the same day, K.D. sent the message and attachments to Company #1

20 HOOPER and CHALK conspired to create these messages containing false information and false and  
21 fraudulent documents for the purpose of convincing Company #1 that L.B. had approved the opening of  
22 K.D.'s Database account on behalf of the U.S.S. George Washington and that L.B. had the authority, as  
23 Supply Officer, to do so.

24 23. Because Company #1 flagged K.D.'s Database application for possible fraud, Company  
25 #1 did not allow K.D. to open an account.

26 24. HOOPER and CHALK executed and attempted to execute the aforementioned scheme to  
27 defraud for the purpose of fraudulently obtaining proprietary and confidential information from  
28 Company #1's Database, including PII of thousands of individuals. Once HOOPER and CHALK

1 obtained this information, they sold the information to other individuals for profit.

2 25. At all times, in carrying out this conspiracy, HOOPER and CHALK acted with the intent  
3 to defraud Company #1 and others.

4 All in violation of Title 18, United States Code, Section 1349.

5  
6 COUNTS TWO THROUGH FOURTEEN: [18 U.S.C. § 1343 – Wire Fraud]

7 The Grand Jury further charges:

8 MARQUIS ASAAD HOOPER and  
9 NATASHA RENEE CHALK,

9 Defendants herein, as follows:

10 26. Paragraphs 1 through 12 and 14 through 25 are re-alleged and incorporated by reference  
11 as though fully set forth herein.

12 27. Beginning on a date unknown to the Grand Jury but no later than in or about August  
13 2018, and continuing until in or about May 2019, in the State and Eastern District of California and  
14 elsewhere, defendants MARQUIS ASAAD HOOPER and NATASHA RENEE CHALK knowingly  
15 devised, intended to devise, participated in, and executed and attempted to execute by means of wire and  
16 radio communications in interstate and foreign commerce, a material scheme and artifice to defraud  
17 Company #1 and others, and to obtain assets and other property owned by and under the custody and  
18 control of Company #1, including information contained in the Company #1 Database and  
19 Comprehensive Reports generated by the Database, by means of materially false and fraudulent  
20 pretenses, representations, and promises, in violation of Title 18, United States Code, Section 1343.

21 28. On or about the dates set forth below, in the State and Eastern District of California and  
22 elsewhere, for the purpose of executing the aforementioned scheme and artifice to defraud, defendants  
23 MARQUIS ASAAD HOOPER and NATASHA RENEE CHALK knowingly transmitted and caused to  
24 be transmitted by means of wire and radio communication in interstate and foreign commerce, the  
25 following writings, signs, signals, pictures, and sounds:



COUNT	APPROXIMATE DATE OF WIRE	DESCRIPTION
Two	10/8/2018	Wire transmission of electronic mail message sent by HOOPER from Selma, California to Company #1 account representative in Florida on or about October 8, 2018 at 9:00 a.m. PST
Three	10/8/2018	Wire transmission of electronic mail message sent by HOOPER from Selma, California to Company #1 account representative in Florida on or about October 8, 2018 at 10:30 a.m. PST
Four	10/30/2018	Wire transmission of electronic mail message sent by HOOPER from Selma, California to Company #1 account representative in Florida on or about October 30, 2018 at 8:17 a.m. PST
Five	11/19/2018	Wire transmission of Comprehensive Person Search of T.M. on the Database, initiated by HOOPER from Selma, California to Company #1 server in Florida
Six	10/25/2018	Wire transmission of Comprehensive Person Search of J.G. on the Database, initiated by HOOPER from Selma, California to Company #1 server in Florida
Seven	12/15/2018	Wire transmission of Comprehensive Person Search of K.M.B. on the Company #1 Database, initiated by HOOPER from Selma, California to Company #1 server in Florida
Eight	3/28/2019	Wire transmission of electronic mail message sent by HOOPER from Selma, California to K.D. in Virginia on or about March 28, 2019 at 8:05 p.m. PST
Nine	4/22/2019	Wire transmission of electronic mail message sent by HOOPER from Selma, California to K.D. in Virginia on or about April 22, 2019 at 9:59 a.m. PST
Ten	9/8/2018	Wire transmission of Comprehensive Person Search of T.M.W. on the Database, initiated by CHALK from Selma, California to Company #1 server in Florida

1 2 3	Eleven	12/17/2018	Wire transmission of Comprehensive Person Search of T.J.C. on the Database, initiated by CHALK from Selma, California to Company #1 server in Florida
4 5 6	Twelve	9/16/2018	Wire transmission of group chat message on Telegram Internet messaging application sent by CHALK from Selma, California to North Carolina on or about September 16, 2018 at 4:26 p.m. PST
7 8	Thirteen	9/16/2018	Wire transmission of group chat message on Telegram Internet messaging application, sent by CHALK from Selma, California to North Carolina on or about September 16, 2018 at 5:38 p.m. PST
9 10 11	Fourteen	10/20/2018	Wire transmission of group chat message on Telegram Internet messaging application sent by CHALK from Selma, California to North Carolina on or about October 20, 2018 at 4:11 p.m. PST

12 All in violation of Title 18, United States Code, Section 1343.

13 COUNTS FIFTEEN AND SIXTEEN: [18 U.S.C. §§ 1028A and 2 – Aggravated Identity Theft and  
14 Aiding and Abetting]

15 The Grand Jury further charges:

16 MARQUIS ASAAD HOOPER, and  
17 NATASHA RENEE CHALK

18 defendants herein, as follows:

19 29. The Grand Jury realleges and incorporates by reference the allegations set forth in  
20 paragraphs 1 through 28 of this indictment.

21 30. On or about the dates set forth below, in the State and Eastern District of California and  
22 elsewhere, defendant MARQUIS ASAAD HOOPER did knowingly transfer and use a means of  
23 identification of another person without lawful authority during and in relation to an unlawful activity  
24 that constitutes a violation of federal law, to wit, wire fraud in violation of 18 U.S.C. § 1343; that is, he  
25 knowingly transferred and used the means of identification of another person, including but not limited  
26 to the forged signatures of L.B. and T.C.K., to commit wire fraud in violation of 18 U.S.C. § 1343:

COUNT	ON OR ABOUT	ACTUAL PERSON	MEANS OF IDENTIFICATION	CORRESPONDING COUNT	DEFENDANT
FIFTEEN	4/22/2019	L.B.	Name and forged signature of L.B. included on fraudulent driver's license image, sent by HOOPER to K.D. by electronic mail message with instructions to send to Company #1	NINE	HOOPER CHALK
SIXTEEN	4/22/2019	T.C.K.	Fabricated letter from T.C.K. appointing L.B. "Agency Program Coordinator for the Government-wide Commercial Purchase Card (GCPC) Program" sent by HOOPER to K.D. by electronic mail with instructions to send to Company #1	NINE	HOOPER

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

**FORFEITURE ALLEGATION:** 18 U.S.C. § 981(a)(1)(C) and  
28 U.S.C. § 2461(c) – Criminal Forfeiture

31. Upon conviction of the offenses alleged in Counts One through Sixteen of this Indictment, defendants MARQUIS ASAAD HOOPER and NATASHA RENEE CHALK shall forfeit to the United States, pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), any property, real or personal, constituting or derived from proceeds traceable to said violations.

32. If any property subject to forfeiture, as a result of the offenses alleged in this Indictment, for which defendants are convicted:

- 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,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

A TRUE BILL.

**/s/ Signature on file w/AUSA**

\_\_\_\_\_  
FOREPERSON

McGREGOR W. SCOTT  
United States Attorney

**KIRK E. SHERRIFF**

\_\_\_\_\_  
KIRK E. SHERRIFF  
Assistant United States Attorney  
Chief, Fresno Office

**FILED**  
Jan 28, 2021  
CLERK, U.S. DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

No. \_\_\_\_\_

1:21-cr-00024-NONE-SKO

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**UNITED STATES DISTRICT COURT**

*Eastern District of California*

*Criminal Division*

THE UNITED STATES OF AMERICA

vs.

MARQUIS ASAAD HOOPER and  
NATASHA RENEE CHALK

---

INDICTMENT

VIOLATION(S): 18 U.S.C. § 1349 – Conspiracy to Commit Wire Fraud (1 COUNT); 18 U.S.C. § 1343 – Wire Fraud (13 COUNTS); 18 U.S.C. § 1028A and 18 U.S.C. § 2 – Aggravated Identity Theft and Aiding and Abetting (2 COUNTS); and 18 U.S.C. § 981(a)(1)(C), 28 U.S.C. § 2461(c) – Criminal Forfeiture

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*A true bill,*

15 |

\_\_\_\_\_  
*Foreman.*

Filed in open court this \_\_\_\_\_ day

of \_\_\_\_\_, A.D. 20 \_\_\_\_\_

\_\_\_\_\_  
*Clerk.*

Bail, \$ \_\_\_ ISSUE NO BAIL WARRANTS FOR ALL DEFENDANTS \_\_\_

*B. McAniff*

\_\_\_\_\_  
1/28/2021

**DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION -- IN U.S. DISTRICT COURT**

BY  COMPLAINT  INFORMATION  INDICTMENT  
 SUPERSEDING: Case No.

Name of District Court, and/or Judge/Magistrate Judge Location (City)  
UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

See Indictment

Petty

Misdemeanor

Felony

Place of offense  
KINGS COUNTY

U.S.C. Citation  
See Indictment

**DEFENDANT -- U.S. vs.**  
**MARQUIS ASAAD HOOPER**

Address {

Birth Date

Male

Alien

Female

(if applicable)

(Optional unless a juvenile)

**PROCEEDING**

Name of Complainant Agency, or Person (& Title, if any)

NCIS / SANTIAGO CORONA

person is awaiting trial in another Federal or State Court, give name of court

this person/proceeding is transferred from another district per FRCrP  20  21  40. Show District

this is a reprosecution of charges previously dismissed which were dismissed on motion of:  
 U.S. Att'y  Defense

this prosecution relates to a pending case involving this same defendant

prior proceedings or appearance(s) before U.S. Magistrate Judge regarding this defendant were recorded under

SHOW  
DOCKET NO.

MAGISTRATE  
JUDGE CASE NO.

**DEFENDANT**

**IS NOT IN CUSTODY**

- 1)  Has not been arrested, pending outcome of this proceeding  
If not detained, give date any prior summons was served on above charges
- 2)  Is a Fugitive
- 3)  Is on Bail or Release from (show District)

**IS IN CUSTODY**

- 4)  On this charge
- 5)  On another conviction
- 6)  Awaiting trial on other charges }  Fed'l  State  
If answer to (6) is "Yes," show name of institution

Has detainer been filed?  Yes  No

If "Yes," give date filed

Mo.

Day

Year

**DATE OF ARREST**

Or ... if Arresting Agency & Warrant were not Federal

Mo.

Day

Year

**DATE TRANSFERRED TO U.S. CUSTODY**

This report amends AO 257 previously submitted

Name and Office of Person Furnishing Information on THIS FORM

THIS FORM

DEBRA DE LA PENA

U.S. Att'y

Other U.S. Agency

Name of Asst. U.S. Att'y (if assigned)

VINCENTE TENNERELLI

**ADDITIONAL INFORMATION OR COMMENTS**

**ADD FORFEITURE UNIT** (Check if Forfeiture Allegation)

**PLEASE ISSUE NO BAIL WARRANT**

**DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION -- IN U.S. DISTRICT COURT**

BY  COMPLAINT  INFORMATION  INDICTMENT  
 SUPERSEDING: Case No.

Name of District Court, and/or Judge/Magistrate Judge Location (City)  
UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

See Indictment

Petty

Misdemeanor

Felony

Place of offense  
KINGS COUNTY

U.S.C. Citation  
See Indictment

**DEFENDANT -- U.S. vs.**  
**NATASHA RENEE CHALK**

Address {

Birth Date

Male

Alien

Female

(if applicable)

(Optional unless a juvenile)

**PROCEEDING**

Name of Complainant Agency, or Person (& Title, if any)

NCIS / SANTIAGO CORONA

person is awaiting trial in another Federal or State Court, give name of court

this person/proceeding is transferred from another district per FRCrP  20  21  40. Show District

this is a reprosecution of charges previously dismissed which were dismissed on motion of:  
 U.S. Att'y  Defense

this prosecution relates to a pending case involving this same defendant

prior proceedings or appearance(s) before U.S. Magistrate Judge regarding this defendant were recorded under

SHOW  
DOCKET NO.

MAGISTRATE  
JUDGE CASE NO.

Name and Office of Person  
Furnishing Information on

THIS FORM

DEBRA DE LA PENA

U.S. Att'y  Other U.S. Agency

Name of Asst. U.S.  
Att'y (if assigned)

VINCENTE TENNERELLI

**DEFENDANT**

**IS NOT IN CUSTODY**

- 1)  Has not been arrested, pending outcome of this proceeding  
If not detained, give date any prior summons was served on above charges
- 2)  Is a Fugitive
- 3)  Is on Bail or Release from (show District)

**IS IN CUSTODY**

- 4)  On this charge
- 5)  On another conviction
- 6)  Awaiting trial on other charges }  Fed'l  State  
If answer to (6) is "Yes," show name of institution

Has detainer  
been filed?

Yes  
 No

If "Yes,"  
give date  
filed

Mo. Day Year

DATE OF  
ARREST

Or ... if Arresting Agency & Warrant were not Federal

Mo. Day Year

DATE TRANSFERRED  
TO U.S. CUSTODY

This report amends AO 257 previously submitted

ADDITIONAL INFORMATION OR COMMENTS

ADD FORFEITURE UNIT (Check if Forfeiture Allegation)

**PLEASE ISSUE NO BAIL WARRANT**

**United States v. HOOPER and CHALK**  
**Penalties for Indictment**

**Defendants**

**MARQUIS ASAAD HOOPER**

**NATASHA RENEE CHALK**

**COUNT 1: ALL DEFENDANTS**

VIOLATION: 18 U.S.C. § 1349 – Conspiracy to Commit Wire Fraud

PENALTIES: Statutory maximum of 20 years in prison  
Fine of up to \$250,000, or both fine and imprisonment  
Supervised release of up to 3 years

SPECIAL ASSESSMENT: \$100 (mandatory on each count)

**COUNTS 2-14: ALL DEFENDANTS**

VIOLATION: 18 U.S.C. § 1343 – Wire Fraud

PENALTIES: Statutory maximum of 20 years in prison  
Fine of up to \$250,000, or both fine and imprisonment  
Supervised release of up to 3 years

SPECIAL ASSESSMENT: \$100 (mandatory on each count)

**COUNTS 15: MARQUIS ASAAD HOOPER and NATASHA RENEE CHALK**

VIOLATION: 18 U.S.C. § 1028A and 18 U.S.C. § 2 – Aggravated Identity Theft and Aiding and Abetting

PENALTIES: Mandatory 2-year sentence, consecutive to other counts

SPECIAL ASSESSMENT: \$100 (mandatory on each count)

**COUNT 16: MARQUIS ASAAD HOOPER**

VIOLATION: 18 U.S.C. § 1028A and 18 U.S.C. § 2 – Aggravated Identity Theft and Aiding and Abetting

PENALTIES: Mandatory 2-year sentence, consecutive to other counts

SPECIAL ASSESSMENT: \$100 (mandatory on each count)



**FORFEITURE ALLEGATION: All Defendants**

VIOLATION: 18 U.S.C. §§ 981(a)(1)(C), 982(a)(2)(B), 28 U.S.C. § 2461(c) – Criminal Forfeiture

PENALTIES: As stated in the charging document