

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

UNITED STATES OF AMERICA : **CRIMINAL NO.** _____
v. : **DATE FILED:** _____
RON CREDLE : **VIOLATIONS:**
: **18 U.S.C. § 1344 (bank fraud - 1 count)**
: **18 U.S.C. § 1028A(a)(1) (aggravated**
: **identity theft - 1 count)**
: **18 U.S.C. § 2 (aiding and abetting)**
: **Notice of forfeiture**

I N F O R M A T I O N

COUNT ONE

THE UNITED STATES ATTORNEY CHARGES THAT:

1. At all times material to this information, TD Bank was a financial institution whose deposits were insured by the Federal Deposit Insurance Corporation, FDIC Number 18409.

2. From on or about February 7, 2012, to on or about February 15, 2012, in the Eastern District of Pennsylvania and elsewhere, defendant

RON CREDLE

knowingly executed, attempted to execute, and aided and abetted the execution of, a scheme to defraud TD Bank 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.

It was a part of the scheme that:

3. An individual known to the grand jury, who was working as a teller for TD Bank, illegally provided means of identification and identity information, including the names, dates of birth, driver's license numbers, social security numbers, and bank account numbers of

TD Bank customers, including a customer with the initials A.T., to an individual unknown to the grand jury, in exchange for the promise of money.

4. The individual unknown to the grand jury who received the means of identification and identity information of the TD Bank account holders from the TD Bank teller, and others unknown to the grand jury, recruited other individuals, including defendant RON CREDLE, to utilize the means of identification and identity information to defraud TD Bank by fraudulently accessing the bank accounts and by cashing counterfeit checks drawn on the customers' accounts.

5. Defendant RON CREDLE, and others known and unknown to the grand jury, withdrew large amounts of cash from the bank accounts of TD Bank customers whose means of identification and identity information were illegally provided by the TD Bank teller, including a TD Bank customer with the initials A.T., all without the knowledge and consent of the TD Bank customers, by, among other methods, making cash withdrawals, and cashing counterfeit checks. In order to access the accounts, defendant CREDLE and others known and unknown to the grand jury were typically provided with false identification documents bearing their photographs but containing the names of the true account holders for the customer accounts.

6. On or about February 7, 2012, at a TD Bank branch in Morrisville, Pennsylvania, defendant RON CREDLE deposited into the TD Bank checking account of A.T. ending in 0629 a counterfeit check of "Goldman & Warshaw" drawn on Lakeland Bank, dated February 3, 2012, check number 071753, in the amount of \$12,482.27, made payable to A.T., and simultaneously withdrew \$8,683.58 cash from the TD Bank checking account of A.T. ending in 0629. At the time defendant CREDLE withdrew this cash, he presented a driver's license in A.T.'s name but containing defendant CREDLE's photograph.

7. On or about February 7, 2012, at the TD Bank Chestnut Hill branch in Philadelphia, Pennsylvania, defendant RON CREDLE attempted to withdraw \$4,000 cash and succeeded in withdrawing \$1,600 cash from the TD Bank checking account of A.T. ending in 0629. At the time defendant CREDLE withdrew this cash, he presented a driver's license in A.T.'s name but containing defendant CREDLE's photograph.

8. On or about February 7, 2012, at the TD Bank branch at 15th Street and JFK Boulevard in Philadelphia, Pennsylvania, defendant RON CREDLE attempted to withdraw \$4,000 cash and succeeded in withdrawing \$3,000 cash from the TD Bank checking account of A.T. ending in 0629. At the time defendant CREDLE withdrew this cash, he presented a New Jersey driver's license in A.T.'s name but containing defendant CREDLE's photograph.

9. On or about February 7, 2012, at a TD Bank branch in Bensalem, Pennsylvania, defendant RON CREDLE cashed against the TD Bank checking account of A.T. ending in 0629 a counterfeit check of "Goldman & Warshaw," drawn on Lakeland Bank, dated February 3, 2012, check number 071802, in the amount of \$7,500, made payable to A.T. At the time defendant CREDLE cashed this check, he presented a driver's license in A.T.'s name but containing defendant CREDLE's photograph.

10. On or about February 14, 2012, at the TD Bank City Hall branch in Philadelphia, Pennsylvania, defendant RON CREDLE attempted to withdraw \$5,000 cash and succeeded in withdrawing \$4,798.58 cash from the TD Bank checking account of A.T. ending in 0629. At the time defendant CREDLE withdrew this cash, he presented a New Jersey driver's license in A.T.'s name but containing defendant CREDLE's photograph.

11. On or about February 15, 2012, at the TD Bank City Hall branch in Philadelphia, Pennsylvania, defendant RON CREDLE attempted to withdraw \$7,000 cash from

the TD Bank checking account of A.T. ending in 0629. At the time defendant CREDLE attempted to withdraw this cash, he presented a New Jersey driver's license in A.T.'s name but containing defendant CREDLE's photograph.

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

COUNT TWO

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

On or about February 7, 2012, in the Eastern District of Pennsylvania, and elsewhere, defendant

RON CREDLE

knowingly and without lawful authority, possessed and used a means of identification of another person, that is, the name of A.T. and the TD Bank account number ending in 0629, during and in relation to bank fraud.

In violation of Title 18, United States Code, Sections 1028A(a)(1), (c)(5).

NOTICE OF FORFEITURE

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

1. As a result of the violation of Title 18, United States Code, Section 1344, as set forth in Count One of this information, defendant

RON CREDLE

to the United States of America any property constituting, or derived from, proceeds obtained directly or indirectly from the commission of such offense, including but not limited to \$170,820 in United States currency (money judgment)

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 up to the value of the property subject to forfeiture.

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

ZANE DAVID MEMEGER
UNITED STATES ATTORNEY