

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA)	
)	No.
)	
v.)	
)	
CASANDRA WALLS also known as)	Violations: Title 18, United States Code,
Casandra Jones,)	Sections 1343, 1028A(a)(1), and 2
JERMAINE JONES, and)	
DEEDRA MASSEY)	<u>UNDER SEAL</u>

COUNT ONE

The SPECIAL FEBRUARY 2008-1 GRAND JURY charges:

1. At times material to this Indictment:

a. PDO Financial, LLC (PDO) did business in the Northern District of Illinois as PayDay One. PDO was in the business of making loans over the Internet, with its principal office located in Fort Worth, Texas.

b. PDO received and maintained electronic copies of loan applications, and supporting documentation sent by fax, or sent over the Internet, on its computer server located in Fort Worth, Texas.

c. AT&T was a global communications company with an office located in Arlington Heights, Illinois.

d. CASANDRA WALLS, also known as "Casandra Jones," worked for AT&T at its Arlington Heights office between July 1, 2007, and August 31, 2007, as a temporary employee. WALLS resided in Chicago, Illinois at an address on West Fulton Boulevard ("West Fulton Residence").

e. JERMAINE JONES was unemployed, and resided in Chicago, Illinois

with WALLS at the West Fulton Residence.

f. JERMAINE JONES maintained an AT&T Internet Services account registered in the name of JERMAINE JONES at the West Fulton Residence.

g. DEEDRA MASSEY, WALLS'S sister, resided in Naperville, Illinois, at an address on Chamberlain Lane ("Chamberlain Residence"). MASSEY maintained phone service at the Chamberlain Residence through AT&T.

2. Beginning no later than on or about July 1, 2007, and continuing until on or about January 31, 2009, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

CASANDRA WALLS, also known as Casandra Jones,
JERMAINE JONES, and
DEEDRA MASSEY,

defendants herein, knowingly devised and intended to devise, and participated in, a scheme to defraud and to obtain money, property, and funds, owned by and under the custody and control of PDO, by means of materially false and fraudulent pretenses, representations, and promises, which scheme is further described below:

3. It was part of the scheme that, while a temporary employee for AT&T, WALLS misappropriated the means of identification, as defined by Title 18, United States Code, Section 1028(d)(7), including the names and social security numbers, of approximately 2,100 AT&T employees ("Victim Employees"), including Victims A, B, C, D, and E.

4. It was further part of the scheme that WALLS, JONES, and MASSEY caused the submission of loan applications to PDO over the Internet, using the names and social security numbers of individual Victim Employees on PDO loan applications, without the knowledge or consent of said Victim Employees.

5. It was further part of the scheme that in addition to using Victim Employees' names and social security numbers without authorization, WALLS, JONES, and MASSEY caused false and fraudulent documentation, such as a copy of a forged driver's license bearing the name of a Victim Employee and the photo of another unknown individual, to be faxed to PDO as part of the loan applications.

6. It was further part of the scheme that WALLS, JONES, and MASSEY directed PDO, through the loan application, to deposit the loan proceeds into specified bank accounts controlled by WALLS, JONES, or MASSEY.

7. It was further part of the scheme that WALLS, JONES, and MASSEY fraudulently obtained over \$70,000 by seeking and receiving loans in the Victim Employees' names.

8. It was further part of the scheme that WALLS, JONES, and MASSEY concealed and hid, and caused to be concealed and hidden, the acts done in furtherance of the scheme, and the purpose of those acts.

9. On or about March 12, 2008, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

CASANDRA WALLS, also known as Casandra Jones,
JERMAINE JONES, and
DEEDRA MASEY,

defendants herein, for the purpose of executing the aforesaid scheme, did transmit and cause to be transmitted, by means of wire communication in interstate commerce, a writing, sign, and signal, namely, a fax purporting to be a pay statement from Unisource Systems in the name of Victim A, transmitted from the West Fulton Residence to PDO in Fort Worth, Texas;

In violation of Title 18, United States Code, Sections 1343 and 2.

COUNT TWO

The SPECIAL FEBRUARY 2008-1 GRAND JURY further charges:

1. The allegations in paragraphs 1 through 8 of Count One of this indictment are hereby realleged and incorporated herein by reference.

2. On or about April 4, 2008, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

CASANDRA WALLS, also known as Casandra Jones,
JERMAINE JONES, and
DEEDRA MASEY,

defendants herein, for the purpose of executing the aforesaid scheme, did transmit and cause to be transmitted, by means of wire communication in interstate commerce, a writing, sign, and signal, namely, a fax purporting to be a copy of an Illinois Driver's License in the name of Victim B, transmitted from the West Fulton Residence to PDO in Fort Worth, Texas;

In violation of Title 18, United States Code, Sections 1343 and 2.

COUNT THREE

The SPECIAL FEBRUARY 2008-1 GRAND JURY further charges:

1. The allegations in paragraphs 1 through 8 of Count One of this indictment are hereby realleged and incorporated herein by reference.

2. On or about February 14, 2008, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

CASANDRA WALLS, also known as Casandra Jones,
JERMAINE JONES, and
DEEDRA MASEY,

defendants herein, for the purpose of executing the aforesaid scheme, did transmit and cause to be transmitted, by means of wire communication in interstate commerce, a writing, sign, and signal, namely, a loan application using the name and social security number of Victim C, transmitted from the West Fulton residence to PDO in Fort Worth, Texas;

In violation of Title 18, United States Code, Sections 1343 and 2.

COUNT FOUR

The SPECIAL FEBRUARY 2008-1 GRAND JURY further charges:

1. The allegations in paragraphs 1 through 8 of Count One of this indictment are hereby realleged and incorporated herein by reference.

2. On or about March 28, 2008, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

CASANDRA WALLS, also known as Casandra Jones,
JERMAINE JONES, and
DEEDRA MASEY,

defendants herein, for the purpose of executing the aforesaid scheme, did transmit and cause to be transmitted, by means of wire communication in interstate commerce, a writing, sign, and signal, namely, a fax purporting to be a copy of an Illinois Driver's License in the name of Victim D, transmitted from the West Fulton residence to PDO in Fort Worth, Texas;

In violation of Title 18, United States Code, Sections 1343 and 2.

COUNT FIVE

The SPECIAL FEBRUARY 2008-1 GRAND JURY further charges:

1. The allegations in paragraphs 1 through 8 of Count One of this indictment are hereby realleged and incorporated herein by reference.

2. On or about May 8, 2008, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

CASANDRA WALLS, also known as Casandra Jones,
JERMAINE JONES, and
DEEDRA MASEY,

defendants herein, for the purpose of executing the aforesaid scheme, did transmit and cause to be transmitted, by means of wire communication in interstate commerce, a writing, sign, and signal, namely, a fax purporting to be a copy of a Woodforest National Bank account statement in the name of Victim E, transmitted from the West Fulton Residence, to PDO in Fort Worth, Texas;

In violation of Title 18, United States Code, Sections 1343 and 2.

COUNT SIX

The SPECIAL FEBRUARY 2008-1 GRAND JURY further charges:

On or about March 12, 2008, at Chicago, in the Northern District of Illinois, Eastern
Division,

CASANDRA WALLS, also known as Casandra Jones,
JERMAINE JONES, and
DEEDRA MASEY,

defendants herein, did knowingly possess and use, without lawful authority, a means of
identification of another person, namely, the names and social security numbers of Victim A
during and in relation to wire fraud as described in Count One of this Indictment;

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

COUNT SEVEN

The SPECIAL FEBRUARY 2008-1 GRAND JURY further charges:

On or about April 4, 2008, at Chicago, in the Northern District of Illinois, Eastern
Division,

CASANDRA WALLS, also known as Casandra Jones,
JERMAINE JONES, and
DEEDRA MASEY,

defendants herein, did knowingly possess and use, without lawful authority, a means of
identification of another person, namely, the names and social security numbers of Victim B
during and in relation to wire fraud as described in Count Two of this Indictment;

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

COUNT EIGHT

The SPECIAL FEBRUARY 2008-1 GRAND JURY further charges:

On or about February 14, 2008, at Chicago, in the Northern District of Illinois, Eastern
Division,

CASANDRA WALLS, also known as Casandra Jones,
JERMAINE JONES, and
DEEDRA MASEY,

defendants herein, did knowingly possess and use, without lawful authority, a means of
identification of another person, namely, the names and social security numbers of Victim C
during and in relation to wire fraud as described in Count Three of this Indictment;

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

COUNT NINE

The SPECIAL FEBRUARY 2008-1 GRAND JURY further charges:

On or about March 28, 2008, at Chicago, in the Northern District of Illinois, Eastern
Division,

CASANDRA WALLS, also known as Casandra Jones,
JERMAINE JONES, and
DEEDRA MASEY,

defendants herein, did knowingly possess and use, without lawful authority, a means of
identification of another person, namely, the names and social security numbers of Victim D
during and in relation to wire fraud as described in Count Four of this Indictment;

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

COUNT TEN

The SPECIAL FEBRUARY 2008-1 GRAND JURY further charges:

On or about March 8, 2008, at Chicago, in the Northern District of Illinois, Eastern
Division,

CASANDRA WALLS, also known as Casandra Jones,
JERMAINE JONES, and
DEEDRA MASEY,

defendants herein, did knowingly possess and use, without lawful authority, a means of
identification of another person, namely, the names and social security numbers of Victim E
during and in relation to wire fraud as described in Count Five of this Indictment;

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

FORFEITURE ALLEGATION

The SPECIAL FEBRUARY 2008-1 GRAND JURY further alleges:

1. The allegations of Counts One through Five of this Indictment are realleged and incorporated herein by reference for the purpose of alleging forfeiture to the United States pursuant to Title 18, United States Code, Section 982.

2. As a result of their violations of Title 18, United States Code, Section 1343, as alleged in the foregoing Indictment,

CASANDRA WALLS, also known as Casandra Jones,
JERMAINE JONES, and
DEEDRA MASEY,

defendants herein, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(2), any and all right, title, and interest they may have in any property, real and personal, constituting, and derived from, proceeds obtained directly and indirectly, from wire fraud, which property is subject to forfeiture pursuant to Title 18, United States Code, Section 982.

3. The interests of the defendants subject to forfeiture pursuant to Title 18, United States Code, Section 982, include, but are not limited to any property constituting, derived from, and traceable to, the proceeds that the defendants obtained directly or indirectly as a result of the offense, including but not limited to:

- a. One (1) HP computer, serial number MX12900253, PS Form 715 # A01415721;
- b. One (1) HP computer, serial number 3CR81205M2, PS Form 715 # A01415729;
- c. One (1) Toshiba laptop computer, serial number 48267161K, PEAP barcode # IS0000193049;
- d. One (1) HP computer, serial number MXX71006R7, PEAP barcode # IS0000193050;

e. One (1) Acer laptop computer, serial number LXAMV0X050810040833524, PEAP barcode # IS0000193052; and

f. One (1) Dell computer, serial number 4FWS9G1, PEAP barcode # IS0000193055.

4. If any of the forfeitable property described above, as a result of any act or omission by the defendants:

- 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 under the provisions of Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1).

All pursuant to Title 18, United States Code, Section 982.

A TRUE BILL

FOREPERSON

UNITED STATES ATTORNEY