

fraudulently acquired tens of thousands of dollars of merchandise from retail chain stores by paying for the merchandise with counterfeit checks that bore fictitious or real persons' names, fictitious or real addresses, and fictitious or real bank account numbers. The defendants and others later returned the merchandise to the retail chain stores for refunds. When the counterfeit checks were dishonored by the banks on which they were purportedly written, the retail chain stores lost either the merchandise or the refund.

3. It was a part of the scheme that the defendants and others entered retail chain stores and purchased various types of merchandise with counterfeit checks. Some of the counterfeit checks contained real persons' names and others contained fictitious names. Some of the checks contained real persons' addresses and others contained fictitious addresses. Some of the checks contained real bank account numbers and others contained fictitious bank account numbers.

4. It was further a part of the scheme that the defendants and others possessed, and when asked, displayed counterfeit drivers' licenses for identification verification by the retail chain stores when the merchandise was purchased.

5. It was a further part of the scheme that the defendants and others frequently returned the merchandise to stores in the same retail store chain, but at locations different than where the merchandise was originally purchased.

Upon the successful return of merchandise, the retail stores would refund the purchase price of the merchandise in cash to the defendants and other participants in the scheme.

6. It was a further part of the scheme that the defendants and others possessed and used implements and materials to create counterfeit drivers' licenses. The counterfeit drivers' licenses bore fictitious or real persons' names and fictitious or real addresses.

7. It was a further part of the scheme that the defendants and others stole and caused to be stolen, identification information of persons that included dates of birth, social security numbers, and bank account numbers.

8. It was a further part of the scheme that the defendants and other participants in the scheme traveled in pairs and groups from state to state for the purpose of purchasing and returning merchandise acquired with counterfeit checks.

9. It was a further part of the scheme that the defendants and others would rent automobiles and use commercial airlines to travel from state to state.

10. On or about July 12, 2011, in the Northern District of Illinois, Western Division,

ANTHONY HARDY,
CAMERON LOVE,
ANTHONY TAYLOR,

and
WILLIAM DORN,

defendants herein, and others that participated in the scheme, for the purpose of executing the aforesaid scheme, and attempting to do so, knowingly did cause to be transmitted by means of a wire communication in interstate commerce from Huntley, Illinois to other states, certain signals, namely check processing information for check no. 4303;

In violation of Title 18, United States Code, Section 1343.

COUNT TWO

The DECEMBER 2011 GRAND JURY further charges:

1. Paragraphs 1 through 9 of Count One of this Indictment are re-alleged and incorporated herein as if fully set forth.

2. On or about July 12, 2011, in the Northern District of Illinois, Western Division,

ANTHONY HARDY,
CAMERON LOVE,
ANTHONY TAYLOR,
and
WILLIAM DORN,

defendants herein, and others that participated in the scheme, for the purpose of executing the aforesaid scheme, and attempting to do so, knowingly did cause to be transmitted by means of a wire communication in interstate commerce from Huntley, Illinois to other states, certain signals, namely check processing for check no. 4332;

In violation of Title 18, United States Code, Section 1343.

COUNT THREE

The DECEMBER 2011 GRAND JURY further charges:

1. Paragraphs 1 through 9 of Count One of this Indictment are re-alleged and incorporated herein as if fully set forth.

2. On or about July 13, 2011, in the Northern District of Illinois, Eastern Division,

ANTHONY HARDY,
CAMERON LOVE,
ANTHONY TAYLOR,
and
WILLIAM DORN,

defendants herein, and others that participated in the scheme, for the purpose of executing the aforesaid scheme, and attempting to do so, knowingly did cause to be transmitted by means of a wire communication in interstate commerce from Montgomery, Illinois to other states, certain signals, namely check processing for check no. 4404;

In violation of Title 18, United States Code, Section 1343.

A TRUE BILL:

FOREPERSON

ACTING UNITED STATES ATTORNEY