

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

EARL LEE COBB IV,
TIRRELL PERRY THOMAS,
NICKOLAS MAURICE FRY,
JEROME DATRA PERRY,
JOSIAH NATHAN PRESTON,
JAMES LANGFORD,
SEAN ALLEN HANEY,
KEVIN LAVELL HUNTER II,
BRENDA MARIE DAVIS,
DARMESHA LAKEYA GUNN,
ELNORA SNIPES,
MARY RADCLIFF,
DESIREE ANALIESE WINFIELD,
KYLE DWAYNE MOSLEY,
CRYSTAL KAY PUGH,
ANTOINE NAIVON YOUNGER,
TIFFANY DANIELLE SANDERS,
DWAYNE EDWARD PERRY, and
KELSEY ALICE THOMPSON,

INDICTMENT

Defendants.

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The Grand Jury charges:

COUNT 1

(Conspiracy to Commit Bank Fraud)

1. At all times material to this Indictment, Bank of America, N.A., was a financial institution with branches in and around Grand Rapids, Michigan, in the Southern Division of the Western District of Michigan, whose deposits were insured by the Federal Deposit Insurance Corporation.

2. Beginning no later than in or about November 2015, and continuing through at least in or about December 2015, in Calhoun County, in the Southern Division of the Western District of Michigan, and elsewhere, Defendants,

EARL LEE COBB IV,
TIRRELL PERRY THOMAS,
NICKOLAS MAURICE FRY,
JEROME DATRA PERRY,
JOSIAH NATHAN PRESTON,
JAMES LANGFORD,
SEAN ALLEN HANEY,
KEVIN LAVELL HUNTER II,
BRENDA MARIE DAVIS,
DARMESHA LAKEYA GUNN,
ELNORA SNIPES,
MARY RADCLIFF,
DESIREE ANALIESE WINFIELD,
KYLE DWAYNE MOSLEY,
CRYSTAL KAY PUGH,
ANTOINE NAIVON YOUNGER,
TIFFANY DANIELLE SANDERS,
DWAYNE EDWARD PERRY, and
KELSEY ALICE THOMPSON,

did conspire and agree with each other, and with other persons known and unknown to the Grand Jury, to knowingly execute, and attempt to execute, a scheme and artifice to obtain, by means of false and fraudulent pretenses, representations, and promises, moneys and funds owned by, and under the custody and control of, Bank of America, N.A., a financial institution.

Object of the Conspiracy

3. The principal object of the conspiracy was to illegally obtain money and funds owned by, and under the custody and control of, Bank of America, N.A.

Manner and Means of the Conspiracy

4. In furtherance of the conspiracy and to effect the object thereof, THOMAS, FRY, JEROME PERRY, PRESTON, and J.S. (deceased), recruited individuals, including HANEY, HUNTER, DAVIS, GUNN, SNIPES, RADCLIFF, WINFIELD, MOSLEY, PUGH,

YOUNGER, SANDERS, DWAYNE PERRY, and THOMPSON, and other persons known and unknown to the Grand Jury, to open Bank of America, N.A. ("BOA") bank accounts, or to use an existing BOA bank account, for use in the scheme.

5. To facilitate the scheme, HANEY, DAVIS, GUNN, SNIPES, RADCLIFF, WINFIELD, MOSLEY, PUGH, YOUNGER, SANDERS, DWAYNE PERRY, and THOMPSON, and other persons known and unknown to the Grand Jury, opened BOA bank accounts in their respective names at BOA branches in and around Grand Rapids, Michigan, and HUNTER used an existing BOA account in HUNTER's name (collectively, "BOA bank accounts").

6. COBB deposited fraudulent checks into the BOA bank accounts, thereby fraudulently inflating balances in the BOA bank accounts.

7. Following the deposit of fraudulent checks into the BOA bank accounts, COBB, THOMAS, FRY, JEROME PERRY, PRESTON, LANGFORD, HANEY, HUNTER, GUNN, WINFIELD, MOSLEY, PUGH, YOUNGER, SANDERS, DWAYNE PERRY, and THOMPSON placed phone calls to a BOA automated call center, which provided information about BOA account balances.

8. Also following the deposit of fraudulent checks into the BOA bank accounts, while at FireKeepers Casino, in Emmett Charter Township, Michigan, HANEY, HUNTER, DAVIS, GUNN, SNIPES, RADCLIFF, WINFIELD, MOSLEY, PUGH, YOUNGER, SANDERS, DWAYNE PERRY, and THOMPSON, and others known and unknown to the Grand Jury, obtained, or attempted to obtain, money and funds from the BOA bank accounts, which monies were owned by, and under the custody and control of, BOA.

9. Also following the deposit of fraudulent checks into the BOA bank accounts, HUNTER, DAVIS, WINFIELD, PRESTON, MOSLEY, YOUNGER, SANDERS, and DWAYNE PERRY, and others known and unknown to the Grand Jury, used Automated Teller

Machines (“ATM”) and teller withdrawals at financial institutions, including Fifth Third Bank and BOA, to obtain, or attempt to obtain, money and funds from the BOA bank accounts, which monies were owned by, and under the custody and control of, BOA.

10. It was further part of the scheme that THOMAS, JEROME PERRY, PRESTON, FRY, LANGFORD, and J.S. facilitated transportation to FireKeepers Casino and financial institutions by renting vehicles, using their personal vehicles, or driving a vehicle owned or rented by another person.

11. Defendants, and others known and unknown to the Grand Jury, misrepresented, concealed, and hid, and caused to be misrepresented, concealed, and hidden, certain material facts, including the fraudulent nature of checks COBB deposited into the BOA accounts.

12. As a result of the conspiracy to commit bank fraud, Defendants fraudulently withdrew or caused withdrawals of money and funds in excess of \$200,000 from the BOA bank accounts, which monies were owned by, and under the custody and control of, BOA.

18 U.S.C. § 1349
18 U.S.C. § 1344(2)

COUNT 2
(Bank Fraud)

13. Paragraphs 1 – 12 of Count One are incorporated here.

14. On or about November 26, 2015, in Calhoun County, in the Southern Division of the Western District of Michigan, and elsewhere, Defendants

SEAN ALLEN HANEY,
EARL LEE COBB IV,
TIRRELL PERRY THOMAS, and
NICKOLAS MAURICE FRY,

and other persons known and unknown to the Grand Jury, knowingly executed a scheme and artifice to obtain, by means of false and fraudulent pretenses, representations, and promises, moneys and funds owned by, and under the custody and control of, Bank of America, N.A., a financial institution, by conducting a \$9,951 cash advance at FireKeepers Casino to obtain money from the Bank of America, N.A., bank account ending in 5272.

18 U.S.C. § 1344(2)

18 U.S.C. § 2

COUNT 3
(Bank Fraud)

15. Paragraphs 1 – 12 of Count One are incorporated here.

16. On or about December 1, 2015, in Calhoun County, in the Southern Division of the Western District of Michigan, and elsewhere, Defendants

KEVIN LAVELL HUNTER II,
EARL LEE COBB IV,
TIRRELL PERRY THOMAS, and
NICKOLAS MAURICE FRY,

and other persons known and unknown to the Grand Jury, knowingly executed a scheme and artifice to obtain, by means of false and fraudulent pretenses, representations, and promises, moneys and funds owned by, and under the custody and control of, Bank of America, N.A., a financial institution, by conducting a \$9,951 cash advance at FireKeepers Casino to obtain money from the Bank of America, N.A., bank account ending in 7355.

18 U.S.C. § 1344(2)
18 U.S.C. § 2

COUNT 4
(Bank Fraud)

17. Paragraphs 1 – 12 of Count One are incorporated here.

18. On or about December 2, 2015, in Kalamazoo County, in the Southern Division of the Western District of Michigan, and elsewhere, Defendants

KEVIN LAVELL HUNTER II,
EARL LEE COBB IV,
TIRRELL PERRY THOMAS, and
NICKOLAS MAURICE FRY,

and other persons known and unknown to the Grand Jury, knowingly executed a scheme and artifice to obtain, by means of false and fraudulent pretenses, representations, and promises, moneys and funds owned by, and under the custody and control of, Bank of America, N.A., a financial institution, by making an ATM withdrawal at a Fifth Third Bank branch to obtain \$523 from the Bank of America, N.A., bank account ending in 7355.

18 U.S.C. § 1344(2)

18 U.S.C. § 2

COUNT 5
(Bank Fraud)

19. Paragraphs 1 – 12 of Count One are incorporated here.

20. On or about December 3, 2015, in Calhoun County, in the Southern Division of the Western District of Michigan, and elsewhere, Defendants

BRENDA MARIE DAVIS,
EARL LEE COBB IV, and
TIRRELL PERRY THOMAS,

and other persons known and unknown to the Grand Jury, knowingly executed a scheme and artifice to obtain, by means of false and fraudulent pretenses, representations, and promises, moneys and funds owned by, and under the custody and control of, Bank of America, N.A., a financial institution, by conducting a \$8,025 cash advance at FireKeepers Casino to obtain money from the Bank of America, N.A., bank account ending in 9948.

18 U.S.C. § 1344(2)
18 U.S.C. § 2

COUNT 6
(Bank Fraud)

21. Paragraphs 1 – 12 of Count One are incorporated here.

22. On or about December 3, 2015, in Kalamazoo County, in the Southern Division of the Western District of Michigan, and elsewhere, Defendants

BRENDA MARIE DAVIS,
EARL LEE COBB IV, and
TIRRELL PERRY THOMAS,

and other persons known and unknown to the Grand Jury, knowingly attempted to execute a scheme and artifice to obtain, by means of false and fraudulent pretenses, representations, and promises, moneys and funds owned by, and under the custody and control of, Bank of America, N.A., a financial institution, by using an ATM at a Fifth Third Bank branch to attempt to withdraw money from the Bank of America, N.A., bank account ending in 9948.

18 U.S.C. § 1344(2)

18 U.S.C. § 2

COUNT 7
(Bank Fraud)

23. Paragraphs 1 – 12 of Count One are incorporated here.

24. On or about December 5, 2015, in Calhoun County, in the Southern Division of the Western District of Michigan, and elsewhere, Defendants

DARMESHA LAKEYA GUNN,
DESIREE ANALIESE WINFIELD,
EARL LEE COBB IV,
TIRRELL PERRY THOMAS,
NICKOLAS MAURICE FRY, and
JEROME DATRA PERRY,

and other persons known and unknown to the Grand Jury, knowingly attempted to execute a scheme and artifice to obtain, by means of false and fraudulent pretenses, representations, and promises, moneys and funds owned by, and under the custody and control of, Bank of America, N.A., a financial institution, by attempting to conduct a \$9,000 cash advance at FireKeepers Casino to obtain money from the Bank of America, N.A., bank account ending in 7940.

18 U.S.C. § 1344(2)
18 U.S.C. § 2

COUNT 8
(Bank Fraud)

25. Paragraphs 1 – 12 of Count One are incorporated here.

26. On or about December 5, 2015, in Calhoun County, in the Southern Division of the Western District of Michigan, and elsewhere, Defendants

DESIREE ANALIESE WINFIELD,
DARMESHA LAKEYA GUNN,
EARL LEE COBB IV,
TIRRELL PERRY THOMAS,
NICKOLAS MAURICE FRY, and
JEROME DATRA PERRY,

and other persons known and unknown to the Grand Jury, knowingly attempted to execute a scheme and artifice to obtain, by means of false and fraudulent pretenses, representations, and promises, moneys and funds owned by, and under the custody and control of, Bank of America, N.A., a financial institution, by attempting to conduct a \$9,000 cash advance at FireKeepers Casino to obtain money from the Bank of America, N.A., bank account ending in 5602.

18 U.S.C. § 1344(2)
18 U.S.C. § 2

COUNT 9
(Bank Fraud)

27. Paragraphs 1 – 12 of Count One are incorporated here.

28. On or about December 5, 2015, in Kalamazoo County, in the Southern Division of the Western District of Michigan, and elsewhere, Defendants

DESIREE ANALIESE WINFIELD,
EARL LEE COBB IV,
TIRRELL PERRY THOMAS, and
JEROME DATRA PERRY,

and other persons known and unknown to the Grand Jury, knowingly executed a scheme and artifice to obtain, by means of false and fraudulent pretenses, representations, and promises, moneys and funds owned by, and under the custody and control of, Bank of America, N.A., a financial institution, by conducting an ATM withdrawal at a Fifth Third Bank branch to obtain \$743 from the Bank of America, N.A., bank account ending in 5602.

18 U.S.C. § 1344(2)
18 U.S.C. § 2

COUNT 10
(Bank Fraud)

29. Paragraphs 1 – 12 of Count One are incorporated here.

30. On or about December 5, 2015, in Calhoun County, in the Southern Division of the Western District of Michigan, and elsewhere, Defendants

ELNORA SNIPES
JAMES LANGFORD,
EARL LEE COBB IV,
TIRRELL PERRY THOMAS,
NICKOLAS MAURICE FRY, and
JEROME DATRA PERRY,

and other persons known and unknown to the Grand Jury, knowingly executed a scheme and artifice to obtain, by means of false and fraudulent pretenses, representations, and promises, moneys and funds owned by, and under the custody and control of, Bank of America, N.A., a financial institution, by conducting a \$9,844 cash advance at FireKeepers Casino to obtain money from the Bank of America, N.A., bank account ending in 3904.

18 U.S.C. § 1344(2)

18 U.S.C. § 2

COUNT 11
(Bank Fraud)

31. Paragraphs 1 – 12 of Count One are incorporated here.

32. On or about December 6, 2015, in Calhoun County, in the Southern Division of the Western District of Michigan, and elsewhere, Defendants

ELNORA SNIPES,
JAMES LANGFORD,
EARL LEE COBB IV,
TIRRELL PERRY THOMAS, and
JEROME DATRA PERRY,

and other persons known and unknown to the Grand Jury, knowingly attempted to execute a scheme and artifice to obtain, by means of false and fraudulent pretenses, representations, and promises, moneys and funds owned by, and under the custody and control of, Bank of America, N.A., a financial institution, by attempting to conduct a \$9,200 cash advance at FireKeepers Casino to obtain money from the Bank of America, N.A., bank account ending in 3904.

18 U.S.C. § 1344(2)

18 U.S.C. § 2

COUNT 12
(Bank Fraud)

33. Paragraphs 1 – 12 of Count One are incorporated here.

34. On or about December 5, 2015, in Calhoun County, in the Southern Division of the Western District of Michigan, and elsewhere, Defendants

MARY RADCLIFF,
EARL LEE COBB IV,
TIRRELL PERRY THOMAS,
NICKOLAS MAURICE FRY, and
JEROME DATRA PERRY,

and other persons known and unknown to the Grand Jury, knowingly executed a scheme and artifice to obtain, by means of false and fraudulent pretenses, representations, and promises, moneys and funds owned by, and under the custody and control of, Bank of America, N.A., a financial institution, by conducting a \$9,476 cash advance at FireKeepers Casino to obtain money from the Bank of America, N.A., bank account ending in 4269.

18 U.S.C. § 1344(2)

18 U.S.C. § 2

COUNT 13
(Bank Fraud)

35. Paragraphs 1 – 12 of Count One are incorporated here.

36. On or about December 6, 2015, in Calhoun County, in the Southern Division of the Western District of Michigan, and elsewhere, Defendants

MARY RADCLIFF,
EARL LEE COBB IV,
TIRRELL PERRY THOMAS, and
JEROME DATRA PERRY,

and other persons known and unknown to the Grand Jury, knowingly attempted to execute a scheme and artifice to obtain, by means of false and fraudulent pretenses, representations, and promises, moneys and funds owned by, and under the custody and control of, Bank of America, N.A., a financial institution, by attempting to conduct a \$9,200 cash advance at FireKeepers Casino to obtain money from the Bank of America, N.A., bank account ending in 4269.

18 U.S.C. § 1344(2)
18 U.S.C. § 2

COUNT 14
(Bank Fraud)

37. Paragraphs 1 – 12 of Count One are incorporated here.

38. On or about December 6, 2015, in Kalamazoo County, in the Southern Division of the Western District of Michigan, and elsewhere, Defendants

MARY RADCLIFF,
EARL LEE COBB IV,
TIRRELL PERRY THOMAS, and
JEROME DATRA PERRY,

and other persons known and unknown to the Grand Jury, knowingly executed a scheme and artifice to obtain, by means of false and fraudulent pretenses, representations, and promises, moneys and funds owned by, and under the custody and control of, Bank of America, N.A., a financial institution, by conducting an ATM withdrawal at a Fifth Third Bank branch to obtain \$623 from the Bank of America, N.A., bank account ending in 4269.

18 U.S.C. § 1344(2)
18 U.S.C. § 2

COUNT 15
(Bank Fraud)

39. Paragraphs 1 – 12 of Count One are incorporated here.

40. On or about December 12, 2015, in Calhoun County, in the Southern Division of the Western District of Michigan, and elsewhere, Defendants

CRYSTAL KAY PUGH,
KYLE DWAYNE MOSLEY,
EARL LEE COBB IV,
TIRRELL PERRY THOMAS,
NICKOLAS MAURICE FRY, and
JOSIAH NATHAN PRESTON,

and other persons known and unknown to the Grand Jury, knowingly executed a scheme and artifice to obtain, by means of false and fraudulent pretenses, representations, and promises, moneys and funds owned by, and under the custody and control of, Bank of America, N.A., a financial institution, by conducting a \$9,844 cash advance at FireKeepers Casino to obtain money from the Bank of America, N.A., bank account ending in 7360.

18 U.S.C. § 1344(2)

18 U.S.C. § 2

COUNT 16
(Bank Fraud)

41. Paragraphs 1 – 12 of Count One are incorporated here.

42. On or about December 12, 2015, in Kalamazoo County, in the Southern Division of the Western District of Michigan, and elsewhere, Defendants

KYLE DWAYNE MOSLEY,
CRYSTAL KAY PUGH,
EARL LEE COBB IV,
TIRRELL PERRY THOMAS,
NICKOLAS MAURICE FRY, and
JOSIAH NATHAN PRESTON,

and other persons known and unknown to the Grand Jury, knowingly executed a scheme and artifice to obtain, by means of false and fraudulent pretenses, representations, and promises, moneys and funds owned by, and under the custody and control of, Bank of America, N.A., a financial institution, by conducting an ATM withdrawal at a Fifth Third Bank branch to obtain \$703 from the Bank of America, N.A., bank account ending in 9980.

18 U.S.C. § 1344(2)

18 U.S.C. § 2

COUNT 17
(Bank Fraud)

43. Paragraphs 1 – 12 of Count One are incorporated here.

44. On or about December 13, 2015, in Calhoun County, in the Southern Division of the Western District of Michigan, and elsewhere, Defendants

KYLE DWAYNE MOSLEY,
EARL LEE COBB IV,
TIRRELL PERRY THOMAS,
NICKOLAS MAURICE FRY, and
JOSIAH NATHAN PRESTON,

and other persons known and unknown to the Grand Jury, knowingly executed a scheme and artifice to obtain, by means of false and fraudulent pretenses, representations, and promises, moneys and funds owned by, and under the custody and control of, Bank of America, N.A., a financial institution, by conducting a \$9,951 cash advance at FireKeepers Casino to obtain money from the Bank of America, N.A., bank account ending in 9980.

18 U.S.C. § 1344(2)
18 U.S.C. § 2

COUNT 18
(Bank Fraud)

45. Paragraphs 1 – 12 of Count One are incorporated here.

46. On or about December 13, 2015, in Kalamazoo County, in the Southern Division of the Western District of Michigan, and elsewhere, Defendants

KYLE DWAYNE MOSLEY,
EARL LEE COBB IV,
TIRRELL PERRY THOMAS, and
NICKOLAS MAURICE FRY,

and other persons known and unknown to the Grand Jury, knowingly executed a scheme and artifice to obtain, by means of false and fraudulent pretenses, representations, and promises, moneys and funds owned by, and under the custody and control of, Bank of America, N.A., a financial institution, by conducting an ATM withdrawal at a Fifth Third Bank branch to obtain \$783 from the Bank of America, N.A., bank account ending in 9980.

18 U.S.C. § 1344(2)
18 U.S.C. § 2

COUNT 19
(Bank Fraud)

47. Paragraphs 1 – 12 of Count One are incorporated here.

48. On or about December 14, 2015, in Calhoun County, in the Southern Division of the Western District of Michigan, and elsewhere, Defendants

KYLE DWAYNE MOSLEY,
EARL LEE COBB IV,
TIRRELL PERRY THOMAS, and
NICKOLAS MAURICE FRY,

and other persons known and unknown to the Grand Jury, knowingly executed a scheme and artifice to obtain, by means of false and fraudulent pretenses, representations, and promises, moneys and funds owned by, and under the custody and control of, Bank of America, N.A., a financial institution, by conducting a \$9,951 cash advance at FireKeepers Casino to obtain money from the Bank of America, N.A., bank account ending in 9980.

18 U.S.C. § 1344(2)
18 U.S.C. § 2

COUNT 20
(Bank Fraud)

49. Paragraphs 1 – 12 of Count One are incorporated here.

50. On or about December 15, 2015, in Calhoun County, in the Southern Division of the Western District of Michigan, and elsewhere, Defendants

ANTOINE NAIVON YOUNGER
EARL LEE COBB IV, and
TIRRELL PERRY THOMAS,

and other persons known and unknown to the Grand Jury, knowingly executed a scheme and artifice to obtain, by means of false and fraudulent pretenses, representations, and promises, moneys and funds owned by, and under the custody and control of, Bank of America, N.A., a financial institution, by conducting a \$9,844 cash advance at FireKeepers Casino to obtain money from the Bank of America, N.A., bank account ending in 4457.

18 U.S.C. § 1344(2)
18 U.S.C. § 2

COUNT 21
(Bank Fraud)

51. Paragraphs 1 – 12 of Count One are incorporated here.

52. On or about December 15, 2015, in Kalamazoo County, in the Southern Division of the Western District of Michigan, and elsewhere, Defendants

ANTOINE NAIVON YOUNGER,
EARL LEE COBB IV, and
TIRRELL PERRY THOMAS,

and other persons known and unknown to the Grand Jury, knowingly executed a scheme and artifice to obtain, by means of false and fraudulent pretenses, representations, and promises, moneys and funds owned by, and under the custody and control of, Bank of America, N.A., a financial institution, by conducting an ATM withdrawal at a Fifth Third Bank branch to obtain \$743 from the Bank of America, N.A., bank account ending in 4457.

18 U.S.C. § 1344(2)
18 U.S.C. § 2

COUNT 22
(Bank Fraud)

53. Paragraphs 1 – 12 of Count One are incorporated here.

54. On or about December 16, 2015, in Calhoun County, in the Southern Division of the Western District of Michigan, and elsewhere, Defendants

TIFFANY DANIELLE SANDERS
EARL LEE COBB IV, and
TIRRELL PERRY THOMAS,

and other persons known and unknown to the Grand Jury, knowingly executed a scheme and artifice to obtain, by means of false and fraudulent pretenses, representations, and promises, moneys and funds owned by, and under the custody and control of, Bank of America, N.A., a financial institution, by conducting a \$9,951 cash advance at FireKeepers Casino to obtain money from the Bank of America, N.A., bank account ending in 4489.

18 U.S.C. § 1344(2)
18 U.S.C. § 2

COUNT 23
(Bank Fraud)

55. Paragraphs 1 – 12 of Count One are incorporated here.

56. On or about December 16, 2015, in Kent County, in the Southern Division of the Western District of Michigan, and elsewhere, Defendants

TIFFANY DANIELLE SANDERS, and
EARL LEE COBB IV,

and other persons known and unknown to the Grand Jury, knowingly executed a scheme and artifice to obtain, by means of false and fraudulent pretenses, representations, and promises, moneys and funds owned by, and under the custody and control of, Bank of America, N.A., a financial institution, by conducting a teller withdrawal at a Bank of America, N.A., branch to obtain \$5,300 from the Bank of America, N.A., bank account ending in 4489.

18 U.S.C. § 1344(2)
18 U.S.C. § 2

COUNT 24
(Bank Fraud)

57. Paragraphs 1 – 12 of Count One are incorporated here.

58. On or about December 19, 2015, in Calhoun County, in the Southern Division of the Western District of Michigan, and elsewhere, Defendants

DWAYNE EDWARD PERRY,
EARL LEE COBB IV,
TIRRELL PERRY THOMAS, and
NICKOLAS MAURICE FRY,

and other persons known and unknown to the Grand Jury, knowingly attempted to execute a scheme and artifice to obtain, by means of false and fraudulent pretenses, representations, and promises, moneys and funds owned by, and under the custody and control of, Bank of America, N.A., a financial institution, by attempting to conduct a \$9,300 cash advance at FireKeepers Casino to obtain money from the Bank of America, N.A., bank account ending in 2131.

COUNT 25
(Bank Fraud)

59. Paragraphs 1 – 12 of Count One are incorporated here.

60. On or about December 19, 2015, in Calhoun County, in the Southern Division of the Western District of Michigan, and elsewhere, Defendants

DWAYNE EDWARD PERRY,
EARL LEE COBB IV, and
TIRRELL PERRY THOMAS,

and other persons known and unknown to the Grand Jury, knowingly executed a scheme and artifice to obtain, by means of false and fraudulent pretenses, representations, and promises, moneys and funds owned by, and under the custody and control of, Bank of America, N.A., a financial institution, by conducting a \$9,951 cash advance at FireKeepers Casino to obtain money from the Bank of America, N.A., bank account ending in 2131.

18 U.S.C. § 1344(2)
18 U.S.C. § 2

COUNT 26
(Bank Fraud)

61. Paragraphs 1 – 12 of Count One are incorporated here.

62. On or about December 25, 2015, in Calhoun County, in the Southern Division of the Western District of Michigan, and elsewhere, Defendants

KELSEY THOMPSON,
EARL LEE COBB IV,
TIRRELL PERRY THOMAS, and
JOSIAH NATHAN PRESTON,

and other persons known and unknown to the Grand Jury, knowingly attempted to execute a scheme and artifice to obtain, by means of false and fraudulent pretenses, representations, and promises, moneys and funds owned by, and under the custody and control of, Bank of America, N.A., a financial institution, by attempting to conduct a \$9,200 cash advance at FireKeepers Casino to obtain money from the Bank of America, N.A., bank account ending in 8290.

COUNT 27
(Bank Fraud)

63. Paragraphs 1 – 12 of Count One are incorporated here.

64. On or about December 25, 2015, in Calhoun County, in the Southern Division of the Western District of Michigan, and elsewhere, Defendants

KELSEY ALICE THOMPSON,
EARL LEE COBB IV, and
JOSIAH NATHAN PRESTON,

and other persons known and unknown to the Grand Jury, knowingly executed a scheme and artifice to obtain, by means of false and fraudulent pretenses, representations, and promises, moneys and funds owned by, and under the custody and control of, Bank of America, N.A., a financial institution, by conducting a \$9,844 cash advance at FireKeepers Casino to obtain money from the Bank of America, N.A., bank account ending in 8290.

18 U.S.C. § 1344(2)
18 U.S.C. § 2

COUNT 28
(Bank Fraud)

65. Paragraphs 1 – 12 of Count One are incorporated here.

66. On or about December 25, 2015, in Kalamazoo County, in the Southern Division of the Western District of Michigan, and elsewhere, Defendants

KELSEY ALICE THOMPSON,
EARL LEE COBB IV, and
JOSIAH NATHAN PRESTON,

and other persons known and unknown to the Grand Jury, knowingly executed a scheme and artifice to obtain, by means of false and fraudulent pretenses, representations, and promises, moneys and funds owned by, and under the custody and control of, Bank of America, N.A., a financial institution, by making an ATM withdrawal at a Fifth Third Bank branch to obtain \$703 from the Bank of America, N.A., bank account ending in 8290.

18 U.S.C. § 1344(2)
18 U.S.C. § 2

A TRUE BILL



GRAND JURY FOREPERSON

ANDREW BYERLY BIRGE
Acting United States Attorney



KATE ZELL
Assistant United States Attorney



CHRISTOPHER M. O'CONNOR
Assistant United States Attorney