

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

UNITED STATES OF AMERICA,

Plaintiff,

vs.

TRAVIS KEION ROLLE,
EDWARD LEE ROLLE,
DONTWAN ALAN SANDERS,
MICHAEL MARCUS DILLARD,
NATIA MONIQUE HUDSON,
KENDAL ADRIANE JONES, and
FABIAN LEON JOHNSON,

INDICTMENT

Defendants.

The Grand Jury charges:

COUNT 1

(Conspiracy to Commit Fraud and Aggravated Identity Theft)

From no later than March 15, 2018, to and including July 17, 2018, in Kent County, Kalamazoo County, Eaton County, Calhoun County, and Berrien County, in the Southern Division of the Western District of Michigan, and elsewhere,

TRAVIS KEION ROLLE,
EDWARD LEE ROLLE,
DONTWAN ALAN SANDERS,
MICHAEL MARCUS DILLARD,
NATIA MONIQUE HUDSON,
KENDAL ADRIANE JONES, and
FABIAN LEON JOHNSON

did unlawfully and knowingly conspire, confederate, and agree with each other, and with other persons known and unknown to the grand jury, to commit one or more of the following offenses

against the United States: access device fraud, contrary to 18 U.S.C. § 1029; aggravated identity theft, contrary to 18 U.S.C. § 1028A, and bank fraud, in violation of 18 U.S.C. § 1344(1).

Objects of the Conspiracy

The co-conspirators established the following objects for their conspiracy:

1. To obtain without legal authority valid credit cards and credit card account numbers assigned to other persons;
2. To make unauthorized use of credit card account numbers assigned to other persons to purchase merchandise and stored value cards (also known as gift cards); and
3. To unlawfully enrich themselves by passing the costs of the merchandise and stored value cards to the individual account holders and/or financial institutions issuing the credit cards.

Overt Acts

One of the co-conspirators did commit at least one of the following overt acts to effect the objects of the conspiracy within the Western District of Michigan:

1. No later than on or about March 15, 2018, TRAVIS KEION ROLLE and NATIA MONIQUE HUDSON, who reside in the state of Florida, traveled to Kent County in the state of Michigan for the purpose of stealing mail and obtaining credit card account numbers assigned to other persons to purchase merchandise and stored value cards from retailers.
2. On or about March 30, 2018, NATIA MONIQUE HUDSON used a stolen valid credit card account number assigned to another person to purchase merchandise and a stored value card from a Meijer retail store in Kalamazoo, Michigan.

3. On or about April 1, 2018, NATIA MONIQUE HUDSON used stolen valid credit card account numbers assigned to other persons to purchase merchandise and stored value cards from a Meijer retail store in Battle Creek, Michigan.
4. On or about April 3, 2018, FABIAN LEON JOHNSON used stolen valid credit card account numbers assigned to other persons to purchase merchandise and stored value cards from a Meijer retail store in Grand Ledge, Michigan.
5. On or about April 5, 2018, FABIAN LEON JOHNSON used stolen valid credit card account numbers assigned to other persons to purchase merchandise and stored value cards from a Meijer retail store in Grand Ledge, Michigan.
6. On or about April 5, 2018, TRAVIS KEION ROLLE used stolen valid credit card account numbers assigned to other persons to purchase merchandise and stored value cards from a Meijer retail store in Grand Ledge, Michigan.
7. On or about April 7, 2018, DONTWAN ALAN SANDERS used stolen valid credit card account numbers assigned to other persons to purchase merchandise and stored value cards from a Meijer retail store in Kalamazoo, Michigan.
8. On or about April 8, 2018, DONTWAN ALAN SANDERS used stolen valid credit card account numbers assigned to other persons to purchase merchandise and stored value cards from a Meijer retail store in Kalamazoo, Michigan.
9. On or about April 19, 2018, TRAVIS KEION ROLLE used stolen valid credit card account numbers assigned to other persons to purchase merchandise and stored value cards from a Meijer retail store in Portage, Michigan.

10. On or about April 20, 2018, KENDAL ADRIANE JONES used stolen valid credit card account numbers assigned to other persons to purchase merchandise and stored value cards from a Meijer retail store in Benton Harbor, Michigan.
11. On or about April 20, 2018, EDWARD LEE ROLLE used stolen valid credit card account numbers assigned to other persons to purchase merchandise and stored value cards from a Meijer retail store in Benton Harbor, Michigan.
12. On or about April 25, 2018, KENDAL ADRIANE JONES used a stolen valid credit card account number assigned to another individual to purchase merchandise and stored value cards from a Meijer retail store in Kalamazoo, Michigan.
13. On or about July 17, 2018, EDWARD LEE ROLLE used a stolen valid credit card account number assigned to other persons to purchase merchandise and stored value cards from a Meijer retail store in Kalamazoo, Michigan.
14. On or about July 16, 2018, MICHAEL MARCUS DILLARD used a stolen valid credit card account number assigned to another person to purchase merchandise and stored value cards from a Meijer retail store in Kalamazoo, Michigan.
15. On or about July 17, 2018, MICHAEL MARCUS DILLARD used a stolen valid credit card account number assigned to another person to purchase merchandise and stored value cards from a Meijer retail store in Kalamazoo, Michigan.

18 U.S.C. § 371
18 U.S.C. § 1029
18 U.S.C. § 1029(b)(2)
18 U.S.C. § 1028A
18 U.S.C. § 1344(1)

COUNT 2
(Access Device Fraud)

From no later than March 28, 2018, to on or about July 17, 2018, in Kent County, Kalamazoo County, Eaton County, Calhoun County, and Berrien County, in the Southern Division of the Western District of Michigan, and elsewhere,

TRAVIS KEION ROLLE,
EDWARD LEE ROLLE,
DONTWAN ALAN SANDERS,
MICHAEL MARCUS DILLARD,
NATIA MONIQUE HUDSON,
KENDAL ADRIANE JONES, and
FABIAN LEON JOHNSON

did knowingly and with intent to defraud use one or more unauthorized access devices, and aided and abetted each other in such activity, and by such conduct obtained things of value aggregating \$1,000.00 or more during a one-year period, with an effect on interstate commerce.

Specifically, the defendants used unauthorized credit card account numbers issued by HSBC Bank and/or Capital One, to purchase more than \$396,000 worth of merchandise, including stored value cards (also known as gift cards), at Meijer and other retail outlets in the Western District of Michigan and elsewhere.

18 U.S.C. § 1029(a)(2)
18 U.S.C. § 1029(e)(1) and (3)
18 U.S.C. § 1029(c)(1)(A)(i)
18 U.S.C. § 2

COUNT 3
(Possession of Stolen Mail)

On or about July 17, 2018, in Kalamazoo County, in the Southern Division of the Western District of Michigan,

TRAVIS KEION ROLLE,
EDWARD LEE ROLLE, and
MICHAEL MARCUS DILLARD

did unlawfully have in their possession letters, packages, and mail, and articles and things contained therein, of various residents of Kalamazoo County and Washtenaw County, which had been stolen and taken from the letter boxes, mail receptacles, or other authorized depositories for the mail of such residents, knowing the same to have been stolen and taken.

18 U.S.C. § 1708

COUNT 4
(Possession of Stolen Mail)

On or about July 18, 2018, in Kalamazoo County, in the Southern Division of the Western District of Michigan,

EDWARD LEE ROLLE

did unlawfully have in his possession letters, packages, and mail, and articles and things contained therein, of various residents of Kent County, Washtenaw County, and Wayne County, which had been stolen and taken from the letter boxes, mail receptacles, or other authorized depositories for the mail of such residents, knowing the same to have been stolen and taken.

18 U.S.C. § 1708

COUNT 5
(Aggravated Identity Theft)

On or about April 5, 2018, in Eaton County, in the Southern Division of the Western District of Michigan,

TRAVIS KEION ROLLE

did knowingly use, without lawful authority, the means of identification of another person during and in relation to a felony offense.

Specifically, the defendant used HSBC credit card ending in #4185 assigned to N.E., HSBC credit card ending in #2957 assigned to S.J., and HSBC credit card ending in #6636 assigned to T.B. to purchase retail merchandise, including stored value cards (also known as gift cards), at a Meijer store. The credit card account numbers were assigned to other persons and defendant had no lawful authority to use those credit card account numbers. The felony offense committed by the defendant was access device fraud, in violation of 18 U.S.C. § 1029(a)(2).

18 U.S.C. § 1028A(a)(1)
18 U.S.C. § 1028A(c)(4)
18 U.S.C. § 1028A(b)

COUNT 6
(Aggravated Identity Theft)

On or about April 19, 2018, in Kalamazoo County, in the Southern Division of the Western District of Michigan,

TRAVIS KEION ROLLE

did knowingly use, without lawful authority, the means of identification of another person during and in relation to a felony offense.

Specifically, the defendant used HSBC credit card ending in #4662 assigned to A.R., HSBC credit card ending in #2957 assigned to S.J., HSBC credit card ending in #9316 assigned to D.D., and HSBC credit card ending in #0646 assigned to P.B. to purchase retail merchandise, including stored value cards (also known as gift cards), at a Meijer store. The credit card account numbers were assigned to other persons and defendant had no lawful authority to use those credit card account numbers. The felony offense committed by the defendant was access device fraud, in violation of 18 U.S.C. § 1029(a)(2).

18 U.S.C. § 1028A(a)(1)

18 U.S.C. § 1028A(c)(4)

18 U.S.C. § 1028A(b)

COUNT 7
(Aggravated Identity Theft)

On or about April 20, 2018, in Berrien County, in the Southern Division of the Western District of Michigan,

EDWARD LEE ROLLE

did knowingly use, without lawful authority, the means of identification of another person during and in relation to a felony offense.

Specifically, the defendant used HSBC credit card ending in #9316 assigned to D.D., HSBC credit card ending in #6443 assigned to B.R., and HSBC credit card ending in #7165 assigned to G.H. to purchase retail merchandise, including stored value cards (also known as gift cards), at a Meijer store. The credit card account numbers were assigned to other persons and defendant had no lawful authority to use those credit card account numbers. The felony offense committed by the defendant was access device fraud, in violation of 18 U.S.C. § 1029(a)(2).

18 U.S.C. § 1028A(a)(1)
18 U.S.C. § 1028A(c)(4)
18 U.S.C. § 1028A(b)

COUNT 8
(Aggravated Identity Theft)

On or about July 17, 2018, in Kalamazoo County, in the Southern Division of the Western District of Michigan,

EDWARD LEE ROLLE

did knowingly use, without lawful authority, the means of identification of another person during and in relation to a felony offense.

Specifically, the defendant used Capital One credit card ending in #9309 assigned to W.H. to purchase retail merchandise, including stored value cards (also known as gift cards), at a Meijer store. The credit card account number was assigned to another person and defendant had no lawful authority to use that credit card account number. The felony offense committed by the defendant was access device fraud, in violation of 18 U.S.C. § 1029(a)(2).

18 U.S.C. § 1028A(a)(1)

18 U.S.C. § 1028A(c)(4)

18 U.S.C. § 1028A(b)

COUNT 9
(Aggravated Identity Theft)

On or about April 7, 2018, in Kalamazoo County, in the Southern Division of the Western District of Michigan,

DONTWAN ALAN SANDERS

did knowingly use, without lawful authority, the means of identification of another person during and in relation to a felony offense.

Specifically, the defendant used HSBC credit card ending in #2957 assigned to S.J., HSBC credit card ending in #4326 assigned to K.S., HSBC credit card ending in #6636 assigned to T.B., HSBC credit card ending in #6109 assigned to N.L., and HSBC credit card ending in #3401 assigned to D.S., HSBC credit card #6799 assigned to S.V., and HSBC credit card #6513 assigned to D.L. to purchase retail merchandise, including stored value cards (also known as gift cards), at a Meijer store. The credit card account numbers were assigned to another person and defendant had no lawful authority to use those credit card account numbers. The felony offense committed by the defendant was access device fraud, in violation of 18 U.S.C. § 1029(a)(2).

18 U.S.C. § 1028A(a)(1)
18 U.S.C. § 1028A(c)(4)
18 U.S.C. § 1028A(b)

COUNT 10
(Aggravated Identity Theft)

On or about April 8, 2018, in Kalamazoo County, in the Southern Division of the Western District of Michigan,

DONTWAN ALAN SANDERS

did knowingly use, without lawful authority, the means of identification of another person during and in relation to a felony offense.

Specifically, the defendant used HSBC credit card ending in #3229 assigned to L.S. and HSBC credit card ending in #3633 assigned to K.S. to purchase retail merchandise, including stored value cards (also known as gift cards), at a Meijer store. The credit card account numbers were assigned to another person and defendant had no lawful authority to use those credit card account numbers. The felony offense committed by the defendant was access device fraud, in violation of 18 U.S.C. § 1029(a)(2).

18 U.S.C. § 1028A(a)(1)
18 U.S.C. § 1028A(c)(4)
18 U.S.C. § 1028A(b)

COUNT 11
(Aggravated Identity Theft)

On or about July 16, 2018, in Kalamazoo County, in the Southern Division of the Western District of Michigan,

MICHAEL MARCUS DILLARD

did knowingly use, without lawful authority, the means of identification of another person during and in relation to a felony offense.

Specifically, the defendant used Capital One credit card ending in #2010 assigned to C.R. to purchase retail merchandise, including stored value cards (also known as gift cards), at a Meijer store. The credit card account number was assigned to another person and defendant had no lawful authority to use that credit card account number. The felony offense committed by the defendant was access device fraud, in violation of 18 U.S.C. § 1029(a)(2).

18 U.S.C. § 1028A(a)(1)
18 U.S.C. § 1028A(c)(4)
18 U.S.C. § 1028A(b)

COUNT 12
(Aggravated Identity Theft)

On or about July 17, 2018, in Kalamazoo County, in the Southern Division of the Western District of Michigan,

MICHAEL MARCUS DILLARD

did knowingly use, without lawful authority, the means of identification of another person during and in relation to a felony offense.

Specifically, the defendant used Capital One credit card ending in #2010 assigned to C.R. to purchase retail merchandise, including stored value cards (also known as gift cards), at a Meijer store. The credit card account number was assigned to another person and defendant had no lawful authority to use that credit card account number. The felony offense committed by the defendant was access device fraud, in violation of 18 U.S.C. § 1029(a)(2).

18 U.S.C. § 1028A(a)(1)
18 U.S.C. § 1028A(c)(4)
18 U.S.C. § 1028A(b)

COUNT 13
(Aggravated Identity Theft)

On or about March 30, 2018, in Kalamazoo County, in the Southern Division of the Western District of Michigan,

NATIA MONIQUE HUDSON

did knowingly use, without lawful authority, the means of identification of another person during and in relation to a felony offense.

Specifically, the defendant used HSBC credit card ending in #6513 assigned to D.L. to purchase retail merchandise, including a stored value card (also known as a gift card), at a Meijer store. The credit card account number was assigned to another person and defendant had no lawful authority to use that credit card account number. The felony offense committed by the defendant was access device fraud, in violation of 18 U.S.C. § 1029(a)(2).

18 U.S.C. § 1028A(a)(1)
18 U.S.C. § 1028A(c)(4)
18 U.S.C. § 1028A(b)

COUNT 14
(Aggravated Identity Theft)

On or about April 1, 2018, in Calhoun County, in the Southern Division of the Western District of Michigan,

NATIA MONIQUE HUDSON

did knowingly use, without lawful authority, the means of identification of another person during and in relation to a felony offense.

Specifically, the defendant used HSBC credit card ending in #3229 assigned to L.S., HSBC credit card ending in #7017 assigned to J.C., and HSBC credit card ending in #6603 assigned to C.L. to purchase retail merchandise, including stored value cards (also known as gift cards), at a Meijer store. The credit card account numbers were assigned to another person and defendant had no lawful authority to use those credit card account numbers. The felony offense committed by the defendant was access device fraud, in violation of 18 U.S.C. § 1029(a)(2).

18 U.S.C. § 1028A(a)(1)

18 U.S.C. § 1028A(c)(4)

18 U.S.C. § 1028A(b)

COUNT 15
(Aggravated Identity Theft)

On or about April 20, 2018, in Berrien County, in the Southern Division of the Western District of Michigan,

KENDAL ADRIANE JONES

did knowingly use, without lawful authority, the means of identification of another person during and in relation to a felony offense.

Specifically, the defendant used HSBC credit card ending in #0214 assigned to R.S and HSBC credit card ending in #2957 assigned to S.J. to purchase retail merchandise, including stored value cards (also known as gift cards), at a Meijer store. The credit card account numbers were assigned to another person and defendant had no lawful authority to use those credit card account numbers. The felony offense committed by the defendant was access device fraud, in violation of 18 U.S.C. § 1029(a)(2).

18 U.S.C. § 1028A(a)(1)

18 U.S.C. § 1028A(c)(4)

18 U.S.C. § 1028A(b)

COUNT 16
(Aggravated Identity Theft)

On or about April 25, 2018, in Kalamazoo County, in the Southern Division of the Western District of Michigan,

KENDAL ADRIANE JONES

did knowingly use, without lawful authority, the means of identification of another person during and in relation to a felony offense.

Specifically, the defendant used HSBC credit card ending in #0646 assigned to J.B. to purchase retail merchandise, including stored value cards (also known as gift cards), at a Meijer store. The credit card account number was assigned to another person and defendant had no lawful authority to use that credit card account number. The felony offense committed by the defendant was access device fraud, in violation of 18 U.S.C. § 1029(a)(2).

18 U.S.C. § 1028A(a)(1)
18 U.S.C. § 1028A(c)(4)
18 U.S.C. § 1028A(b)

COUNT 17
(Aggravated Identity Theft)

On or about April 3, 2018, in Eaton County, in the Southern Division of the Western District of Michigan,

FABIAN LEON JOHNSON

did knowingly use, without lawful authority, the means of identification of another person during and in relation to a felony offense.

Specifically, the defendant used HSBC credit card ending in #6513 assigned to D.L., HSBC credit card ending in #4326 assigned to K.S., HSBC credit card ending in #4921 assigned to C.D., and HSBC credit card ending in #6126 assigned to K.B. to purchase retail merchandise, including stored value cards (also known as gift cards), at a Meijer store. The credit card account numbers were assigned to another person and defendant had no lawful authority to use those credit card account numbers. The felony offense committed by the defendant was access device fraud, in violation of 18 U.S.C. § 1029(a)(2).

18 U.S.C. § 1028A(a)(1)

18 U.S.C. § 1028A(c)(4)

18 U.S.C. § 1028A(b)

COUNT 18
(Aggravated Identity Theft)

On or about April 5, 2018, in Eaton County, in the Southern Division of the Western District of Michigan,

FABIAN LEON JOHNSON

did knowingly use, without lawful authority, the means of identification of another person during and in relation to a felony offense.

Specifically, the defendant used HSBC credit card ending in #3401 assigned to D.S., HSBC credit card ending in #8553 assigned to E.V., HSBC credit card ending in #3229 assigned to L.S., and HSBC credit card ending in #3633 assigned to T.B. to purchase retail merchandise, including stored value cards (also known as gift cards), at a Meijer store. The credit card account numbers were assigned to another person and defendant had no lawful authority to use those credit card account numbers. The felony offense committed by the defendant was access device fraud, in violation of 18 U.S.C. § 1029(a)(2).

18 U.S.C. § 1028A(a)(1)

18 U.S.C. § 1028A(c)(4)

18 U.S.C. § 1028A(b)

FORFEITURE ALLEGATION

(Conspiracy to Commit Fraud and Access Device Fraud)

The allegations contained in Counts 1 and 2 of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeitures.

Pursuant to 18 U.S.C. §§ 981(a)(1)(C), 982(a)(2)(B), 1029(c)(1)(C), and 28 U.S.C. § 2461(c), upon conviction of the offenses in violation of 18 U.S.C. §§ 371 and 1029(a)(2) set forth in Counts 1 and 2 of this Indictment, the defendants,

TRAVIS KEION ROLLE,
 EDWARD LEE ROLLE,
 DONTWAN ALAN SANDERS,
 MICHAEL MARCUS DILLARD,
 NATIA MONIQUE HUDSON,
 KENDAL ADRIANE JONES, and
 FABIAN LEON JOHNSON,

shall forfeit to the United States of America any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of such offenses and any personal property used or intended to be used to commit the offenses. The property to be forfeited includes, but is not limited to:

1. PERSONAL PROPERTY:
 - a. Stored Value Cards:

Type	Card Number
MasterCard	XXXXXXXXXXXX1457
MasterCard	XXXXXXXXXXXX1333
MasterCard	XXXXXXXXXXXX1465
MasterCard	XXXXXXXXXXXX1341
MasterCard	XXXXXXXXXXXX1358
MasterCard	XXXXXXXXXXXX1531
MasterCard	XXXXXXXXXXXX1549
MasterCard	XXXXXXXXXXXX1556
Visa	XXXXXXXXXXXX3618
MasterCard	XXXXXXXXXXXX5745
Visa	XXXXXXXXXXXX1923
Visa	XXXXXXXXXXXX4656

Visa	XXXXXXXXXXXXXXXX6524
Visa	XXXXXXXXXXXXXXXX4942
Visa	XXXXXXXXXXXXXXXX3871
Visa	XXXXXXXXXXXXXXXX8058

b. Credit Cards:

Type	Issuing Bank	Card Number
MasterCard	HSBC	XXXXXXXXXXXXXXXX3713
MasterCard	HSBC	XXXXXXXXXXXXXXXX4340
MasterCard	HSBC	XXXXXXXXXXXXXXXX2871
MasterCard	HSBC	XXXXXXXXXXXXXXXX1277
MasterCard	HSBC	XXXXXXXXXXXXXXXX6095
MasterCard	HSBC	XXXXXXXXXXXXXXXX0062
MasterCard	Capital One	XXXXXXXXXXXXXXXX1919

2. SUBSTITUTE ASSETS: If any of the property described above, as a result of any act or omission of 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 pursuant to 21 U.S.C. § 853(p) as incorporated by 18 U.S.C. §§ 982(b)(1) and 1029(c)(2) and 28 U.S.C. § 2461(c).

- 18 U.S.C. § 981(a)(1)(C)**
- 18 U.S.C. § 982(a)(2)(B)**
- 18 U.S.C. § 982(b)(1)**
- 18 U.S.C. § 1029(c)(1)(C)**
- 18 U.S.C. § 1029(c)(2)**
- 21 U.S.C. § 853(p)**
- 28 U.S.C. § 2461(c)**

A TRUE BILL



GRAND JURY FOREPERSON

ANDREW BYERLY BIRGE
United States Attorney



CHRISTOPHER M. O'CONNOR
Assistant United States Attorney