

Presented to the Court by the foreman of the Grand Jury in open Court, in the presence of the Grand Jury and FILED in the U.S. DISTRICT COURT at Seattle, Washington.

JUNE 20 2012
WILLIAM M. McCOOL, Clerk
By [Signature] Deputy

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,
Plaintiff,

v.

CHARLES TONY WILLIAMSON,
aka, GUERILLA BLACK,
aka, MRBUSINESSMAN62,
aka, BLACKDOLLA,
Defendant.

CR12

168 MJP

INDICTMENT

The Grand Jury charges that:

COUNT 1

(Conspiracy to Access Protected Computers to Further Fraud, to Commit Access Device Fraud, and to Commit Bank Fraud)

1. Beginning on a date uncertain, but not later than January 6, 2011, and continuing until on or about February 26, 2012, within the Western District of Washington and elsewhere, CHARLES TONY WILLIAMSON, aka GUERILLA BLACK, aka MRBUSINESSMAN62, aka BLACKDOLLA, did knowingly and willfully conspire, combine, confederate, and agree together with others, known and unknown, to commit offenses against the United States, to wit: unauthorized access to a protected computer to further fraud, in violation of Title 18, United States Code, Section

1 1030(a)(4), access device fraud, in violation of Title 18, United States Code, Sections
2 1029(a)(2), (a)(3) and (a)(5), and bank fraud, in violation of Title 18, United States Code,
3 Section 1344, and committed acts in furtherance of that conspiracy.

4 **Object and Purpose of the Conspiracy**

5 2. The object of the conspiracy was to work together with others, including
6 known computer hackers, to use a variety of means, including hacks of the point of sale
7 computer systems of businesses in the Western District of Washington, to steal thousands
8 of credit card numbers, including credit card numbers that had been issued by the Boeing
9 Employees Credit Union to residents of the Western District of Washington; to then
10 redistribute the stolen credit card numbers to criminal associates who would in turn use
11 them for fraudulent transactions that victimized and caused financial losses to the issuing
12 banks; and, by the trafficking and sale of the stolen credit card numbers, to generate illicit
13 financial proceeds for the use and personal benefit of CHARLES TONY WILLIAMSON,
14 aka GUERILLA BLACK, aka MRBUSINESSMAN62, aka BLACKDOLLA, and other
15 coconspirators, known and unknown to the Grand Jury.

16 **Manner and Means of the Conspiracy**

17 3. It was part of the conspiracy that CHARLES TONY WILLIAMSON, aka
18 GUERILLA BLACK, aka MRBUSINESSMAN62, aka BLACKDOLLA, expressed his
19 preference and desire to coconspirators to buy "dumps" of stolen credit card numbers "in
20 bulk," that is, in single lots of at least 100, or 500, or more.

21 4. It was part of the conspiracy that CHARLES TONY WILLIAMSON, aka
22 GUERILLA BLACK, aka MRBUSINESSMAN62, aka BLACKDOLLA, expressed his
23 preference and desire to coconspirators to obtain credit card numbers that were "freshly"
24 stolen through "point of sale system" computer network intrusions, rather than card
25 numbers that were "skimmed" or stolen from credit card databases that had been
26 previously compiled by others, because the "fresh" card numbers stolen from point of sale
27 system hacks could be used more successfully for fraudulent transactions.

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1 5. It was part of the conspiracy that CHARLES TONY WILLIAMSON's, aka
2 GUERILLA BLACK's, aka MRBUSINESSMAN62's, aka BLACKDOLLA's
3 coconspirators, known and unknown to the Grand Jury, hacked point of sale computer
4 systems of commercial businesses, including businesses in the Western District of
5 Washington, in order to steal large numbers of credit card numbers belonging to those
6 businesses' customers.

7 6. It was further part of the conspiracy that when his hacker coconspirators
8 provided large dumps of stolen credit card numbers to CHARLES TONY
9 WILLIAMSON, aka GUERILLA BLACK, aka MRBUSINESSMAN62, aka
10 BLACKDOLLA, he in turn redistributed the stolen card numbers to a network of criminal
11 associates, with the intent and the expectation that these associates would then use the
12 stolen credit card numbers for fraudulent transactions.

13 7. It was further part of the conspiracy that stolen credit card numbers that
14 were redistributed by CHARLES TONY WILLIAMSON, aka GUERILLA BLACK, aka
15 MRBUSINESSMAN62, aka BLACKDOLLA, from his hacker sources, to his criminal
16 associates, were in fact then used, or attempted to be used in multiple fraudulent
17 transactions, primarily in the State of California, but also in the State of Nevada and
18 intermittently in other states, as well.

19 8. It was further part of the conspiracy that the fraudulent transactions made
20 using the stolen credit card numbers that were redistributed by CHARLES TONY
21 WILLIAMSON, aka GUERILLA BLACK, aka MRBUSINESSMAN62, aka
22 BLACKDOLLA, to his criminal associates caused substantial financial losses to the
23 banks that had issued the stolen credit card numbers, including Boeing Employees Credit
24 Union.

25 9. It was further part of the conspiracy that CHARLES TONY
26 WILLIAMSON, aka GUERILLA BLACK, aka MRBUSINESSMAN62, aka
27 BLACKDOLLA, and his coconspirators, known and unknown to the Grand Jury,
28 received illicit proceeds and profits derived from the use of the stolen credit cards in

1 fraudulent transactions, that those proceeds and profits were primarily at the expense of
2 the banks that issued the stolen card numbers, and that CHARLES TONY
3 WILLIAMSON, aka GUERILLA BLACK, aka MRBUSINESSMAN62, aka
4 BLACKDOLLA, and his coconspirators converted those illicit proceeds and profits to
5 their own personal benefit and use.

6 **Overt Acts**

7 10. In furtherance of the conspiracy and to achieve the object thereof, at least
8 one of the coconspirators committed or caused to be committed, in the Western District of
9 Washington, and elsewhere, at least one of the following overt acts, among others:

10 11. On or about January 6, 2011, a coconspirator hacked the point of sale
11 computer system of a commercial business in Shoreline, Washington, in order to gain
12 access to, and steal the credit card numbers used by the customers of that business.

13 12. On or about January 10, 2011, the coconspirator who hacked the point of
14 sale computer system at the Shoreline, WA business sent an e-mail to CHARLES TONY
15 WILLIAMSON, aka GUERILLA BLACK, aka MRBUSINESSMAN62, aka
16 BLACKDOLLA, that contained multiple customer credit card numbers that were stolen
17 through the hack of that business. The stolen credit card numbers sent included credit
18 card numbers that had been issued by Boeing Employees Credit Union ("BECU"), a
19 federally insured financial institution based in the Western District of Washington. The
20 stolen card numbers that had been issued by BECU included those ending in ****-9865,
21 and in ****-4616.

22 13. On or about January 12, 2011, stolen credit card number ending in
23 ****-9865, issued by BECU, was used for fraudulent transactions, in CA, totaling
24 \$300.00.

25 14. On or about January 13, 2011, stolen credit card number ending in
26 ****-4616, issued by BECU, was used for fraudulent transactions, in CA, totaling
27 \$656.38.

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1 15. On or about January 14, 2011, the coconspirator who hacked the point of
2 sale computer system at the Shoreline, WA business sent an e-mail to CHARLES TONY
3 WILLIAMSON, aka GUERILLA BLACK, aka MRBUSINESSMAN62, aka
4 BLACKDOLLA, that contained multiple customer credit card numbers that were stolen
5 through the hack of that business. The stolen credit card numbers sent included at least
6 one credit card number ending in ****-7211 that had been issued by BECU.

7 16. On or about January 23, 2011, stolen credit card number ending in
8 ****-7211, issued by BECU, was used for fraudulent transactions, in CA, totaling
9 \$247.96.

10 17. On or about January 20, 2011, the coconspirator who hacked the point of
11 sale computer system at the Shoreline, WA business sent an e-mail to CHARLES TONY
12 WILLIAMSON, aka GUERILLA BLACK, aka MRBUSINESSMAN62, aka
13 BLACKDOLLA, that contained multiple customer credit card numbers that were stolen
14 through the hack of that business. The stolen credit card numbers sent included at least
15 five credit card numbers that had been issued by BECU.

16 18. On or about January 28, 2011, the coconspirator who hacked the point of
17 sale computer system at the Shoreline, WA business sent an e-mail to CHARLES TONY
18 WILLIAMSON, aka GUERILLA BLACK, aka MRBUSINESSMAN62, aka
19 BLACKDOLLA, that contained multiple customer credit card numbers that were stolen
20 through the hack of that business, including four credit card numbers that had been issued
21 by BECU.

22 19. On or about February 9, 2011, the coconspirator who hacked the point of
23 sale computer system at the Shoreline, WA business sent an e-mail to CHARLES TONY
24 WILLIAMSON, aka GUERILLA BLACK, aka MRBUSINESSMAN62, aka
25 BLACKDOLLA, that contained multiple customer credit card numbers that were stolen
26 through the hack of that business, including at least one credit card number that had been
27 issued by BECU.

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1 20. On or about February 12, 2011, the coconspirator who hacked the point of
2 sale computer system at the Shoreline, WA business sent an e-mail to CHARLES TONY
3 WILLIAMSON, aka GUERILLA BLACK, aka MRBUSINESSMAN62, aka
4 BLACKDOLLA, that contained multiple customer credit card numbers that were stolen
5 through the hack of that business, including three credit card numbers that had been
6 issued by BECU. One of those numbers ended in ****-9566.

7 21. On or about February 14, 2011, the coconspirator who hacked the point of
8 sale computer system at the Shoreline, WA business sent an e-mail to CHARLES TONY
9 WILLIAMSON, aka GUERILLA BLACK, aka MRBUSINESSMAN62, aka
10 BLACKDOLLA, that contained multiple customer credit card numbers that were stolen
11 through the hack of that business, including at least eight credit card numbers that had
12 been issued by BECU. One of those numbers ended in ****-6469.

13 22. On or about February 15, 2011, stolen credit card number ending in
14 ****-6469, issued by BECU, was used for fraudulent transactions, in CA, totaling
15 \$18.92.

16 23. On or about February 17, 2011, stolen credit card number ending in
17 ****-9566, issued by BECU, was used for fraudulent transactions, in CA, totaling
18 \$261.24.

19 24. On or about February 19, 2011, the coconspirator who hacked the point of
20 sale computer system at the Shoreline, WA business sent an e-mail to CHARLES TONY
21 WILLIAMSON, aka GUERILLA BLACK, aka MRBUSINESSMAN62, aka
22 BLACKDOLLA, that contained multiple customer credit card numbers that were stolen
23 through the hack of that business, including at least one credit card number that had been
24 issued by BECU.

25 25. On or about February 20, 2011, the coconspirator who hacked the point of
26 sale computer system at the Shoreline, WA business sent an e-mail to CHARLES TONY
27 WILLIAMSON, aka GUERILLA BLACK, aka MRBUSINESSMAN62, aka
28 BLACKDOLLA, that contained multiple customer credit card numbers that were stolen

1 through the hack of that business, including at least three credit card numbers that had
2 been issued by BECU. These included card numbers ending in ****-2710 and
3 ****-6417.

4 26. On or about February 21, 2011, stolen credit card number ending in
5 ****-2710, issued by BECU, was used for fraudulent transactions, in CA, totaling
6 \$487.59.

7 27. On or about February 21, 2011, stolen credit card number ending in
8 ****-6417, issued by BECU, was used for fraudulent transactions, in CA, totaling
9 \$341.33.

10 28. On or about July 20, 2011, a coconspirator hacked the point of sale
11 computer system of a restaurant in Seattle, Washington, in order to gain access to, and
12 steal the credit card numbers used by the customers of that business.

13 29. On or about July 24, 2011, the coconspirator who hacked the point of sale
14 computer system at the Seattle, WA restaurant sent an e-mail to CHARLES TONY
15 WILLIAMSON, aka GUERILLA BLACK, aka MRBUSINESSMAN62, aka
16 BLACKDOLLA, that contained multiple customer credit card numbers that were stolen
17 through the hack of that business, including at least one credit card number ending in
18 ****-3762 that had been issued by BECU.

19 30. On or about July 24, 2011, stolen credit card number ending in
20 ***-3762 was used for fraudulent transactions, in CA, totaling \$400.00, and was
21 attempted to be used for other transactions totaling \$82.56.

22 31. On or about July 29, 2011, the coconspirator who hacked the point of sale
23 computer system at the Seattle, WA restaurant sent an e-mail to CHARLES TONY
24 WILLIAMSON, aka GUERILLA BLACK, aka MRBUSINESSMAN62, aka
25 BLACKDOLLA, that contained multiple customer credit card numbers that were stolen
26 through the hack of that business, including at least one credit card number ending in
27 ****-9563 that had been issued by BECU.

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1 32. On or about July 29, 2011, stolen credit card number ending in
2 ****-9563, issued by BECU, was used for fraudulent transactions, in CA, totaling
3 \$405.30, and was attempted to be used for other transactions totaling \$101.08.

4 33. On or about July 31, 2011, the coconspirator who hacked the point of sale
5 computer system at the Seattle, WA restaurant sent an e-mail to CHARLES TONY
6 WILLIAMSON, aka GUERILLA BLACK, aka MRBUSINESSMAN62, aka
7 BLACKDOLLA, that contained multiple customer credit card numbers that were stolen
8 through the hack of that business, including at least two credit card numbers ending in
9 ****-7585 and ****-0168 that had been issued by BECU.

10 34. On or about August 3, 2011, the coconspirator who hacked the point of sale
11 computer system at the Seattle, WA restaurant sent an e-mail to CHARLES TONY
12 WILLIAMSON, aka GUERILLA BLACK, aka MRBUSINESSMAN62, aka
13 BLACKDOLLA, that contained multiple customer credit card numbers that were stolen
14 through the hack of that business, including at least two credit card numbers ending in
15 ****-8760 and ****-6683 that had been issued by BECU.

16 35. On or about August 6, 2011, stolen credit card number ending in
17 ****-0168, issued by BECU, was used for fraudulent transactions, in CA, totaling \$.68,
18 and was attempted to be used for ten other transactions totaling \$270.39.

19 36. On or about August 5, 2011, stolen credit card number ending in
20 ****-8760, issued by BECU, was used for fraudulent transactions, in CA, totaling
21 \$320.00, and was attempted to be used for other transactions totaling \$418.64. There was
22 one telephone transaction attempted in the amount of \$5.62 to a retailer in New York.

23 37. On or about August 5, 2011, stolen credit card number ending in
24 ****-6683, issued by BECU, was used for two attempted fraudulent transactions, in CA
25 and Texas, totaling \$408.05. The California attempt was made in person, meaning that
26 the card was physically located in California, while the Texas fraud attempt was made
27 over the phone to a retailer in Texas.

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38. On or about February 26, 2012, CHARLES TONY WILLIAMSON, aka GUERILLA BLACK, aka MRBUSINESSMAN62, aka BLACKDOLLA, indicated in a telephone conversation that he was interested in credit card numbers stolen through point of sale hacks, and that he wanted as many of those cards "as possible."

39. During the period of the conspiracy, CHARLES TONY WILLIAMSON, aka GUERILLA BLACK, aka MRBUSINESSMAN62, aka BLACKDOLLA, received and took possession of at least 27,257 stolen credit card numbers, that included VISA, Master Card, American Express and Discover card numbers. Of these, 543 of the stolen credit card numbers had been issued by American Express, and fraudulent transactions totaling \$120,185.63 were been made using 187 of the stolen American Express cards. BECU had issued a total of 89 of the card numbers that were stolen and received by CHARLES TONY WILLIAMSON, and 47 of those stolen card numbers were used or attempted to be used in transactions that totaled \$17,000.00.

40. Each of the substantive criminal charges set forth in this Indictment as Counts 2 through 17 are hereby incorporated by reference as overt acts.

All in violation of Title 18, United States Code, Section 371.

COUNT 2

(Accessing a Protected Computer Without Authorization to Further Fraud)

1. Paragraphs 1 through 40 of Count 1 are realleged and incorporated as if fully set forth herein.

2. On or about January 6, 2011, through on or about February 19, 2011, within the Western District of Washington and elsewhere, CHARLES TONY WILLIAMSON, aka GUERILLA BLACK, aka MRBUSINESSMAN62, aka BLACKDOLLA, and other coconspirators known and unknown to the Grand Jury, knowingly and with intent to defraud, accessed protected computers without authorization and in excess of authorization and by means of such conduct furthered an intended fraud, by hacking the

1 point of sale computer system of a commercial business in Shoreline, WA, and using the
2 access gained thereby to steal credit card numbers that had been issued by federally
3 insured financial institutions, including Boeing Employees Credit Union, and then using
4 those stolen credit card numbers for fraudulent transactions that yielded illicit proceeds
5 exceeding \$5,000 in value within a period of one year.

6 All in violation of Title 18, United States Code, Sections 1030(a)(4), and
7 1030(c)(3)(A), and 2.
8

9 **COUNT 3**

10 **(Accessing a Protected Computer Without Authorization to Further Fraud)**

11 1. Paragraphs 1 through 40 of Count 1 are realleged and incorporated as if
12 fully set forth herein.

13 2. On or about July 20, 2011, through on or about August 3, 2011, within the
14 Western District of Washington and elsewhere, CHARLES TONY WILLIAMSON, aka
15 GUERILLA BLACK, aka MRBUSINESSMAN62, aka BLACKDOLLA, and other
16 coconspirators known and unknown to the Grand Jury, knowingly and with intent to
17 defraud, accessed protected computers without authorization and in excess of
18 authorization and by means of such conduct furthered an intended fraud, by hacking the
19 point of sale computer system of a restaurant in Seattle, WA, and using the access gained
20 thereby to steal credit card numbers that had been issued by federally insured financial
21 institutions, including Boeing Employees Credit Union, and then using those stolen credit
22 card numbers for fraudulent transactions that yielded illicit proceeds exceeding \$5,000 in
23 value within a period of one year.

24 All in violation of Title 18, United States Code, Sections 1030(a)(4), and
25 1030(c)(3)(A), and 2
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COUNT 4
(Access Device Fraud)

1
2
3 1. Paragraphs 1 through 40 of Count 1 are realleged and incorporated as if
4 fully set forth herein.

5 2. Beginning on a date uncertain, but on or about January 10, 2011, and
6 continuing until on or about February 21, 2011, within the Western District of
7 Washington and elsewhere, CHARLES TONY WILLIAMSON, aka GUERILLA
8 BLACK, aka MRBUSINESSMAN62, aka BLACKDOLLA, knowingly and with the
9 intent to defraud, trafficked in and used credit card account numbers that had been stolen
10 through a hack of the point of sale computer system of a commercial business in
11 Shoreline, WA, and that had been issued by federally insured financial institutions,
12 including Boeing Employees Credit Union, to residents of the Western District of
13 Washington, including J.L., M.S., B.F., C.L., P.D., and J.B., without the cardholders'
14 knowledge or consent, and by such conduct CHARLES TONY WILLIAMSON, aka
15 GUERILLA BLACK, aka MRBUSINESSMAN62, aka BLACKDOLLA, and his
16 coconspirators obtained profits aggregating \$1,000.00 or more; said trafficking affecting
17 interstate and foreign commerce, in that the credit card account numbers that were so
18 trafficked and used were used by CHARLES TONY WILLIAMSON, aka GUERILLA
19 BLACK, aka MRBUSINESSMAN62, aka BLACKDOLLA, and his criminal associates
20 in fraudulent transactions in states outside the State of Washington.

21 All in violation of Title 18, United States Code, Section 1029(a)(2) and
22 1029(c)(1)(A)(i), and 2.

COUNT 5
(Access Device Fraud)

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25 1. Paragraphs 1 through 40 of Count 1 are realleged and incorporated as if
26 fully set forth herein.

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2. Beginning on a date uncertain, but on or about July 24, 2011, and continuing until on or about August 6, 2011, within the Western District of Washington and elsewhere, CHARLES TONY WILLIAMSON, aka GUERILLA BLACK, aka MRBUSINESSMAN62, aka BLACKDOLLA, knowingly and with the intent to defraud, trafficked in and used credit card account numbers that had been stolen through a hack of the point of sale computer system of a restaurant in Seattle, WA, and that had been issued by federally insured financial institutions, including Boeing Employees Credit Union, to residents of the Western District of Washington, including C.L., M.H., B.S., K.H., and M.G., without the cardholders' knowledge or consent, and by such conduct CHARLES TONY WILLIAMSON, aka GUERILLA BLACK, aka MRBUSINESSMAN62, aka BLACKDOLLA, and his coconspirators obtained profits aggregating \$1,000.00 or more; said trafficking affecting interstate and foreign commerce, in that the credit card account numbers that were so trafficked and used were used by CHARLES TONY WILLIAMSON, aka GUERILLA BLACK, aka MRBUSINESSMAN62, aka BLACKDOLLA, and his criminal associates in fraudulent transactions in states outside the State of Washington.

All in violation of Title 18, United States Code, Section 1029(a)(2) and 1029(c)(1)(A)(i), and 2.

COUNT 6
(Access Device Fraud)

1. Paragraphs 1 through 40 of Count 1 are realleged and incorporated as if fully set forth herein.

2. On or about January 10, 2011, within the Western District of Washington and elsewhere, CHARLES TONY WILLIAMSON, aka GUERILLA BLACK, aka MRBUSINESSMAN62, aka BLACKDOLLA, knowingly and with intent to defraud, possessed fifteen or more unauthorized access devices, that is, credit card account numbers that included credit card numbers that had been issued by the Boeing Employees

1 Credit Union, and belonged to individuals who included residents of the Western District
 2 of Washington, said possession affecting interstate and foreign commerce, in that the
 3 unauthorized access devices were possessed in order to redistribute them to others for the
 4 intended purpose of using them for fraudulent transactions in States outside the State of
 5 Washington.

6 All in violation of Title 18, United States Code, Sections 1029(a)(3) and
 7 1029(c)(1)(A)(i), and 2.

8 **COUNT 7**
 9 **(Access Device Fraud)**

10 1. Paragraphs 1 through 40 of Count 1 are realleged and incorporated as if
 11 fully set forth herein.

12 2. On or about August 4, 2011, within the Western District of Washington and
 13 elsewhere, CHARLES TONY WILLIAMSON, aka GUERILLA BLACK, aka
 14 MRBUSINESSMAN62, aka BLACKDOLLA, knowingly and with intent to defraud,
 15 possessed fifteen or more unauthorized access devices, that is, credit card account
 16 numbers that included credit card numbers that had been issued by the Boeing Employees
 17 Credit Union, and belonged to individuals who included residents of the Western District
 18 of Washington, said possession affecting interstate and foreign commerce, in that the
 19 unauthorized access devices were possessed in order to redistribute them to others for the
 20 intended purpose of using them for fraudulent transactions in States outside the State of
 21 Washington.

22 All in violation of Title 18, United States Code, Sections 1029(a)(3) and
 23 1029(c)(1)(A)(i), and 2.

24 **COUNT 8**
 25 **(Access Device Fraud)**

26 1. Paragraphs 1 through 40 of Count 1 are realleged and incorporated as if
 27 fully set forth herein.
 28

2. On or about February 17, 2011, and continuing until on or about February 21, 2011, within the Western District of Washington and elsewhere, CHARLES TONY WILLIAMSON, aka GUERILLA BLACK, aka MRBUSINESSMAN62, aka BLACKDOLLA, knowingly and with intent to defraud effected transactions, and did aid, abet, counsel, command, induce and procure transactions, with 1 or more access devices issued to another person or person, to receive payment or any other thing of value during any 1-year period the aggregate value of which was equal to or greater than \$1,000, and which transactions affected interstate or foreign commerce; in that CHARLES TONY WILLIAMSON and his coconspirators and associates used the credit card account no. ****-****-****-9566 that was issued by Boeing Employees Credit Union to C.L., and the credit card account no. ****-****-****-2710 that was issued by Boeing Employees Credit Union to J.B., and the credit card account no. ****-****-****-6417 that was issued by Boeing Employees Credit Union to S.D., to effect fraudulent transactions in the State of CA, the aggregate value of which exceeded \$1,000.00.

All in violation of Title 18, United States Code, Sections 1029(a)(5) and (c)(1)(A)(ii), and 2.

COUNT 9
(Access Device Fraud)

1. Paragraphs 1 through 40 of Count 1 are realleged and incorporated as if fully set forth herein.

2. On or about July 24, 2011, and continuing until on or about August 4, 2011, within the Western District of Washington and elsewhere, CHARLES TONY WILLIAMSON, aka GUERILLA BLACK, aka MRBUSINESSMAN62, aka BLACKDOLLA, knowingly and with intent to defraud effected transactions, and did aid, abet, counsel, command, induce and procure transactions, with 1 or more access devices issued to another person or person, to receive payment or any other thing of value during any 1-year period the aggregate value of which was equal to or greater than \$1,000, and which transactions affected interstate or foreign commerce; in that CHARLES TONY

1 WILLIAMSON, aka GUERILLA BLACK, aka MRBUSINESSMAN62, aka
 2 BLACKDOLLA, and his coconspirators and associates used the credit card account no.
 3 ****-****-****-3762 that was issued by Boeing Employees Credit Union to C.L., and
 4 the credit card account no. ****-****-****-9563 that was issued by Boeing Employees
 5 Credit Union to M.H., and the credit card account no. ****-****-****-8760 that was
 6 issued by Boeing Employees Credit Union to K.H., to effect fraudulent transactions in
 7 the State of CA, the aggregate value of which exceeded \$1,000.00.

8 All in violation of Title 18, United States Code, Sections 1029(a)(5) and
 9 (c)(1)(A)(ii), and 2.

10 COUNTS 10 - 17

11 (Bank Fraud)

12 The Offense

13 1. Beginning at a time unknown, but no later than January 6, 2011, and
 14 continuing through on or about August 4, 2011, within the Western District of
 15 Washington and elsewhere, CHARLES TONY WILLIAMSON, aka GUERILLA
 16 BLACK, aka MRBUSINESSMAN62, aka BLACKDOLLA, and others, known and
 17 unknown to the Grand Jury, knowingly and willfully devised and executed a scheme and
 18 artifice to defraud various financial institutions ("the banks,"), including, but not limited
 19 to Boeing Employees' Credit Union ("BECU"), a financial institution as defined by Title
 20 18, United States Code, Section 20, based in the Western District of Washington, and to
 21 obtain moneys, funds, and credits under the custody and control of the banks by means of
 22 material false and fraudulent pretenses, representations and promises, as further described
 23 below.

24 2. The object of the scheme and artifice was to steal credit card numbers that
 25 had been issued by the banks, including BECU; to provide the stolen credit card numbers
 26 first to CHARLES TONY WILLIAMSON, aka GUERILLA BLACK, aka
 27 MRBUSINESSMAN62, aka BLACKDOLLA, who would redistribute them to criminal
 28 associates with the knowledge and intent that they would then be used in fraudulent

1 transactions, primarily in California; and, by way of the scheme, to obtain illicit proceeds,
2 funded by and derived primarily from the banks that had originally issued the stolen credit
3 card numbers, by using the stolen credit card numbers in multiple fraudulent transactions.
4 By way of this series of criminal actions, CHARLES TONY WILLIAMSON, aka
5 GUERILLA BLACK, aka MRBUSINESSMAN62, aka BLACKDOLLA, and others,
6 known and unknown to the Grand Jury, intended to and did generate and receive illicit
7 profits, that they then converted to their own personal benefit and use.

8 **Manner and Means of the Scheme and Artifice to Defraud**

9 3. The manner and means of the scheme and artifice are set forth in
10 Paragraphs 1 through 40 of Count 1 of this Indictment, and said paragraphs are
11 incorporated by reference as if fully set forth herein.

12 **Execution of the Scheme and Artifice to Defraud**

13 4. CHARLES TONY WILLIAMSON, aka GUERILLA BLACK, aka
14 MRBUSINESSMAN62, aka BLACKDOLLA, and others, known and unknown to the
15 Grand Jury, knowingly and willfully stole the credit card numbers identified below during
16 and from unauthorized intrusions of the computer networks of two businesses located in
17 the Western District of Washington, which credit card numbers had been issued by BECU
18 to residents of the Western District of Washington, and redistributed the stolen numbers
19 to other criminal associates and/or coconspirators with the knowledge and intent that they
20 would then be used for fraudulent transactions, and which stolen credit card numbers
21 were then used for fraudulent transactions, on the dates and in the amounts as also
22 specified below:

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Count	Date (on or about) stolen credit card nos. used fraudulently	Fraud Loss	Credit card acct. nos. issued by BECU, to residents of WDWA
10	01/12/2011	\$300.00	****-****-****-9865
11	01/13/2011	\$656.38	****-****-****-4616
12	01/23/2011	\$247.96	****-****-****-7211
13	02/17/2011	\$261.24	****-****-****-9566
14	02/21/2011	\$487.59	****-****-****-2710
15	07/24/2011	\$400.00	****-****-****-3762
16	07/29/2011	\$405.30	****-****-****-9563
17	08/05/2011	\$320.00	****-****-****-8760

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

COUNT 18
(Aggravated Identity Theft)

1. Paragraphs 1 through 40 of Count 1 are realleged and incorporated as if fully set forth herein.

2. On or about January 11, 2011, within the Western District of Washington and elsewhere, CHARLES TONY WILLIAMSON, aka GUERILLA BLACK, aka MRBUSINESSMAN62, aka BLACKDOLLA, knowingly transferred, possessed and used, without lawful authority, a means of identification of another person, to wit, the personally identifiable credit card number of ****-****-****- 6761, belonging to L.D.K., of Shoreline, WA, during and in relation to a felony listed in Title 18, United States Code, Section 1028A(c), to wit, Access Device Fraud, in violation of Title 18, United States Code, Section 1029.

All in violation of Title 18, United States Code, Sections 1028A(a)(1) and 2.

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COUNT 19
(Aggravated Identity Theft)

1. Paragraphs 1 through 40 of Count 1 are realleged and incorporated as if fully set forth herein.

2. On or about January 11, 2011, within the Western District of Washington and elsewhere, CHARLES TONY WILLIAMSON, aka GUERILLA BLACK, aka MRBUSINESSMAN62, aka BLACKDOLLA, knowingly transferred, possessed and used, without lawful authority, a means of identification of another person, to wit, the personally identifiable credit card number of ****-****-****- 0253, belonging to B.H., of Seattle, WA, during and in relation to a felony listed in Title 18, United States Code, Sections 1028A(c), to wit, Access Device Fraud, in violation of Title 18, United States Code, Section 1029.

All in violation of Title 18, United States Code, Section 1028A(a)(1) and 2.

COUNT 20
(Aggravated Identity Theft)

1. Paragraphs 1 through 40 of Count 1 are realleged and incorporated as if fully set forth herein.

2. On or about February 7, 2011, within the Western District of Washington and elsewhere, CHARLES TONY WILLIAMSON, aka GUERILLA BLACK, aka MRBUSINESSMAN62, aka BLACKDOLLA, knowingly transferred, possessed and used, without lawful authority, a means of identification of another person, to wit, the personally identifiable credit card number of ****-****-****-9654 belonging to B.P., of Seattle, WA, during and in relation to a felony listed in Title 18, United States Code, Section 1028A(c), to wit, Access Device Fraud, in violation of Title 18, United States Code, Section 1029.

All in violation of Title 18, United States Code, Sections 1028A(a)(1) and 2.

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COUNT 21

(Aggravated Identity Theft)

1. Paragraphs 1 through 40 of Count 1 are realleged and incorporated as if fully set forth herein.

2. On or about February 17, 2011, within the Western District of Washington and elsewhere, CHARLES TONY WILLIAMSON, aka GUERILLA BLACK, aka MRBUSINESSMAN62, aka BLACKDOLLA, knowingly transferred, possessed and used, without lawful authority, a means of identification of another person, to wit, the personally identifiable credit card number of ****-****-****- 4518, belonging to J.S, of Seattle, WA, during and in relation to a felony listed in Title 18, United States Code, Section 1028A(c), to wit, Access Device Fraud, in violation of Title 18, United States Code, Section 1029.

All in violation of Title 18, United States Code, Sections 1028A(a)(1) and 2.

COUNT 22

(Aggravated Identity Theft)

1. Paragraphs 1 through 40 of Count 1 are realleged and incorporated as if fully set forth herein.

2. On or about January 10, 2011, within the Western District of Washington and elsewhere, CHARLES TONY WILLIAMSON, aka GUERILLA BLACK, aka

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1 MRBUSINESSMAN62, aka BLACKDOLLA, knowingly transferred, possessed and
2 used, without lawful authority, a means of identification of another person, to wit, the
3 personally identifiable credit card number of ****_****_****- 4616, belonging to M.S.,
4 of Monroe, WA, during and in relation to a felony listed in Title 18, United States Code,
5 Section 1028A(c), to wit, Access Device Fraud, in violation of Title 18, United States
6 Code, Section 1029.

7 All in violation of Title 18, United States Code, Sections 1028A(a)(1) and 2.

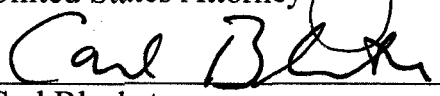
8
9 A TRUE BILL:

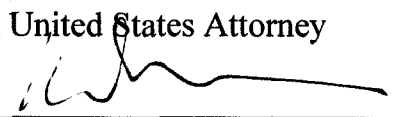
10 DATED this ____ Day of _____, 2012.

11
12
13 *Signature of the Foreperson redacted pursuant
to the policy of the Judicial Conference*

14 FOREPERSON

15
16 
17 JENNY A. DURKAN
18 United States Attorney

19 
20 Carl Blackstone
21 Assistant United States Attorney

22 
23 Kathryn A. Warma
24 Assistant United States Attorney
25
26
27
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