

**CRIMINAL COVER SHEET**

U.S. District Court, Western District of Oklahoma

Petty  Misdemeanor  Felony

Case No. \_\_\_\_\_

**D**

Number of Counts 10 Number of Defendants 3

USAOID No. \_\_\_ By: nlw

Indictment Sealed: Yes  No  OCDEF: Yes  No  Notice  Summons  Writ  Warrant  to Issue

DEFENDANT: <b>WALLACE L. LAWRENCE, III</b>		IAN 19 2010	
Alias(es):		Address: Oklahoma City, OK	
		Phone:	
Age&DOB: 1973	SS#: xxx-	Juvenile: Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Interpreter: Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
SEX: M <input checked="" type="checkbox"/> F <input type="checkbox"/>	RACE: Black	Language/Dialect:	

**Defendant Status:**

<input type="checkbox"/> Not in Custody	Type of Bond Recommended on this Charge:
	OR <input type="checkbox"/> Cash <input type="checkbox"/> 10% <input type="checkbox"/> Unsecured <input type="checkbox"/> Surety <input type="checkbox"/>
Bond set at: \$ _____ Date: _____	Bond in Amount of: \$ _____
Current Bond on Other Charge Federal <input type="checkbox"/> State <input type="checkbox"/>	
<input checked="" type="checkbox"/> In Jail at: Grady County Jail Under Prisoner/Register No.:	Detention <input checked="" type="checkbox"/>

**Prior Proceedings or Appearance(s) Before U.S. Magistrate Judge:**

Case No. M-09-236-CH	Government Motion to Detain: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Complaint: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Bond Set: _____ Date: 12-18-09

**Related Case Information:**

Previous Case No.	Rule 20/Rule 5 from District of:
Additional Defendants: Yes <input type="checkbox"/> No <input type="checkbox"/>	Total Number of defendants:

**Attorney Information:**

Defense Counsel: <b>BROOKE TEBOW</b>	AUSA: _____
Address: 215 Dean A. McGee, Suite 109 Oklahoma City, OK 73102	Phone: 405/609-5930 Fax: 405/609-5932
Phone: 405/609-5930 Fax: 405/609-5932	Federal Agent/Agency: USSS
Retained <input type="checkbox"/> CJA Panel <input type="checkbox"/> Public Defender <input checked="" type="checkbox"/>	Local Agent/Agency:

<u>Count(s)</u>	<u>USC Citation(s)</u>	<u>Offense(s) Charged</u>	<u>Penalty</u>
1-7	18 USC §1343; 18 USC § 2	Wire Fraud; Aiding and Abetting	Not more than 20 years, not more than \$250,000 fine, or both; not more than 3 years supervised release; \$100 special assessment. § 2 adds no additional penalty. On revocation, no more than 2 years supervised release.

<u>Count(s)</u>	<u>USC Citation(s)</u>	<u>Offense(s) Charged</u>	<u>Penalty</u>
8	18 USC § 1029(a)(2); 18 USC § 2	Fraud in Connection With Access Devices; Aiding and Abetting	Not more than 10 years, not more than \$250,000 fine, or both; not more than 3 years supervised release; \$100 special assessment. § 2 adds no additional penalty. On revocation, no more than 2 years supervised release.
9	18 USC § 1028(a)(7); 18 USC § 2	Fraud in Connection With Access Devices; Aiding and Abetting	Not more than 10 years, not more than \$250,000 fine, or both; not more than 3 years supervised release; \$100 special assessment. § 2 adds no additional penalty. On revocation, no more than 2 years supervised release.
10	18 USC § 1028A(a)(1); 18 USC § 2	Aggravated Identity Theft; Aiding and Abetting	Not more than 2 years, not more than \$250,000 fine; no probation or concurrent sentence; not more than 1 year supervised release; \$100 special assessment. § 2 adds no additional penalty. On revocation, no more than 2 years supervised release.

Date: 1/15/10

Signature of AUSA

Mark A. Hancock

800/6-97

**CRIMINAL COVER SHEET**

U.S. District Court, Western District of Oklahoma

Petty  Misdemeanor  Felony

Case No. \_\_\_\_\_ **D**

Number of Counts 10 Number of Defendants 3

USAOID No. \_\_\_ By: nlw

Indictment Sealed: Yes  No  OCDEF: Yes  No  Notice  Summons  Writ  Warrant  to Issue

DEFENDANT: SANDRA C. ACUNA				JAN 19 2010	
Alias(es):		Address: Oklahoma City, OK			
		Phone:			
Age&DOB: 1973	SS#: .....	Juvenile: Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>		Interpreter: Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
SEX: M <input type="checkbox"/> F <input checked="" type="checkbox"/>	RACE: Hispanic	Language/Dialect:			

**Defendant Status:**

<input type="checkbox"/> Not in Custody		Type of Bond Recommended on this Charge:			
Bond set at: \$ _____ Date: _____		OR <input type="checkbox"/> Cash <input type="checkbox"/> 10% <input type="checkbox"/> Unsecured <input checked="" type="checkbox"/> Surety <input type="checkbox"/>			
Current Bond on Other Charge Federal <input type="checkbox"/> State <input type="checkbox"/>		Bond in Amount of: \$5,000			
<input checked="" type="checkbox"/> In Jail at: Oklahoma County Jail (state charges) Under ID No.: 199847634					Detention <input type="checkbox"/>

**Prior Proceedings or Appearance(s) Before U.S. Magistrate Judge:**

Case No. _____	Government Motion to Detain: Yes <input type="checkbox"/> No <input type="checkbox"/>
Complaint: Yes <input type="checkbox"/> No <input type="checkbox"/>	Bond Set: _____ Date: _____

**Related Case Information:**

Previous Case No. _____	Rule 20/Rule 5 from District of: _____
Additional Defendants: Yes <input type="checkbox"/> No <input type="checkbox"/>	Total Number of defendants: _____

**Attorney Information:**

Defense Counsel:		AUSA:	
Address:		Phone: _____	Fax: 405/553-8888
Phone: _____	Fax: _____	Federal Agent/Agency: USSS	
Retained <input type="checkbox"/> CJA Panel <input type="checkbox"/> Public Defender <input type="checkbox"/>		Local Agent/Agency: _____	

<u>Count(s)</u>	<u>USC Citation(s)</u>	<u>Offense(s) Charged</u>	<u>Penalty</u>
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10	18 USC § 1028A(a)(1); 18 USC § 2	Aggravated Identity Theft; Aiding and Abetting	Not more than 2 years, not more than \$250,000 fine; no probation or concurrent sentence; not more than 1 year supervised release; \$100 special assessment. § 2 adds no additional penalty. On revocation, no more than 2 years supervised release.

Date: \_\_\_\_\_

1/15/10

Signature of AUSA \_\_\_\_\_

Mark A. Naray

**CRIMINAL COVER SHEET**

U.S. District Court, Western District of Oklahoma

Petty  Misdemeanor  Felony

Case No. 10-10000-D

Number of Counts 10 Number of Defendants 3

USAOID No. By: nlw

Indictment Sealed: Yes  No  OCADETF: Yes  No  Notice  Summons  Writ  Warrant  to Issue

DEFENDANT: <b>CARRI O. ADAMS</b>			JAN 19 2010		
Alias(es):		Address: Oklahoma City, OK			
		Phone:			
Age&DOB: 1974	SS#: xx.	Juvenile: Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Interpreter: Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>		
SEX: M <input type="checkbox"/> F <input checked="" type="checkbox"/>	RACE: Caucasian	Language/Dialect:			

**Defendant Status:**

<input checked="" type="checkbox"/> Not in Custody		Type of Bond Recommended on this Charge:			
Bond set at: \$		OR <input type="checkbox"/> Cash <input type="checkbox"/> 10% <input type="checkbox"/> Unsecured <input checked="" type="checkbox"/> Surety <input type="checkbox"/>			
Date:		Bond in Amount of: \$5,000			
Current Bond on Other Charge Federal <input type="checkbox"/> State <input type="checkbox"/>					
<input type="checkbox"/> In Jail at: Under Prisoner/Register No.:					Detention <input type="checkbox"/>

**Prior Proceedings or Appearance(s) Before U.S. Magistrate Judge:**

Case No.	Government Motion to Detain: Yes <input type="checkbox"/> No <input type="checkbox"/>
Complaint: Yes <input type="checkbox"/> No <input type="checkbox"/>	Bond Set: Date:

**Related Case Information:**

Previous Case No.	Rule 20/Rule 5 from District of:
Additional Defendants: Yes <input type="checkbox"/> No <input type="checkbox"/>	Total Number of defendants:

**Attorney Information:**

Defense Counsel:		AUSA:	
Address:		Phone:	Fax: 405/553-8888
Phone:	Fax:	Federal Agent/Agency: USSS	
Retained <input type="checkbox"/> CJA Panel <input type="checkbox"/> Public Defender <input type="checkbox"/>		Local Agent/Agency:	

<u>Count(s)</u>	<u>USC Citation(s)</u>	<u>Offense(s) Charged</u>	<u>Penalty</u>
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Date: 1/15/10

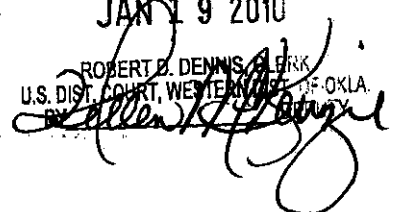
Signature of AUSA Mark A. Yancey  
800/6-97

IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF OKLAHOMA

**FILED**

JAN 19 2010

ROBERT D. DENNIS, CLERK  
U.S. DIST. COURT, WESTERN DISTRICT OF OKLA.



UNITED STATES OF AMERICA, )

Plaintiff, )

-vs- )

WALLACE L. LAWRENCE, III, )  
SANDRA C. ACUNA, and )  
CARRI O. ADAMS, )

Defendants. )

No. **CR 10-011**

**D**

Violations: 18 USC § 1343  
18 USC § 2  
18 USC § 1029(a)(2)  
18 USC § 1028(a)(7)  
18 USC § 1028A(a)(1)

**INDICTMENT**

The Grand Jury charges:

At times during the period of the Indictment:

1. Defendants **WALLACE L. LAWRENCE, III**, and **SANDRA C. ACUNA**, resided at 617 NW 121<sup>st</sup> Terrace, Oklahoma City, Oklahoma. **ACUNA** worked as a receptionist for Dr. Noel Williams, Edmond, Oklahoma; Mercy Medical Neurology, Oklahoma City, Oklahoma; and Human Performance Center, a physical therapy business in Edmond, Oklahoma, and had access to patient debit card, credit card, and checking account information.

2. **LAWRENCE** and defendant **CARRI O. ADAMS** developed a romantic relationship. **ADAMS** worked for Staffmark, a personnel staffing business in Oklahoma City, Oklahoma.

3. Craigslist ([www.craigslist.com](http://www.craigslist.com)) is an online classifieds business, which has its home office and computer servers in California. Craigslist customers use Internet connected computers to place classified advertisements on the craigslist website. Each advertisement placed by a customer is assigned a unique identification number by craigslist.

**COUNTS 1-7**  
**(Wire Fraud)**

The Grand Jury incorporates Paragraphs 1-3.

4. From in or about August 2008 until on or about December 11, 2009, in the Western District of Oklahoma,

----- **WALLACE L. LAWRENCE, III,**  
**SANDRA C. ACUNA, and**  
**CARRIE O. ADAMS,** -----

with the intent to defraud, devised and executed a scheme to defraud in a material manner, and in doing so caused wire communications to be transmitted in interstate commerce.

5. The defendants' scheme to defraud consisted of the following:

(a) **LAWRENCE** and **ADAMS** used computers to place advertisements on craigslist falsely offering to help people who were having trouble paying their bills. On some occasions, rather than using craigslist, flyers were used to advertise the

scheme. Each advertisement listed a telephone number and fictitious name for prospective victims to call;

(b) When prospective victims called the number they spoke to **LAWRENCE**, who used the aliases “Marlin,” “Preston Lockart,” “Jason Alexander,” “Marcus Chandler,” “Matthew Schultz,” “Arthur Blankenship,” “Brandon Jackson,” “Elliott Daniels,” and “Victor.” **LAWRENCE** falsely represented that he worked for a charity or company that would pay the prospective victims’ bills if they would provide him with one half of the amount due on the bill in cash. At times **LAWRENCE** falsely suggested to a caller that the available money was from the economic stimulus plan. **LAWRENCE** arranged to meet the prospective victims and collect the one-half payment in cash. Other times **LAWRENCE** sent **ACUNA**, **ADAMS**, or another female known to the Grand Jury to collect the one-half cash payments for him. **ACUNA**, **ADAMS**, and the third female used the aliases “Jennifer” and “Heather” when identifying themselves to victims and collecting the cash;

(c) In many cases, the prospective victims learned that their bills had been paid as promised. However, the victims later discovered their payments were reversed because a stolen credit card number, debit card number, or bank account number had been used to pay their bills. This left the victims still owing the total bill amount and without the cash payments given to the defendants; and



(d) Compromised credit card numbers, debit card numbers, and checking account numbers used to pay the victims' bills were stolen by ACUNA from other victims of the scheme who were patients of her employers Dr. Noel Williams, Mercy Medical Neurology, or Human Performance Center. LAWRENCE and ACUNA also used the compromised financial information to pay their own debts.

6. In order to execute the scheme, LAWRENCE and ADAMS used a Pioneer Library System IP address, LAWRENCE'S laptop computer, and ADAMS' work computer at Staffmark to transmit via the Internet the following interstate wire communications from Oklahoma to craigslist in California:

<u>Count</u>	<u>Date</u>	<u>Craigslist #</u>	<u>Advertisement Title</u>	<u>Computer or Internet Source</u>
1	10/26/09	1438630112	"Tickets behind, need money to pay we can help!" Call Marcus Chandler 405-204-7671 or 405-286-3523	Pioneer Library's IP address
2	11/03/09	1450181164	"We reconnect the Disconnected!" Call Marcus Chandler 405-204-7671	Staffmark
3	11/23/09	1479958689	"Utility Help Available! Call Now" 405-209-0224 ask for Matthew Schultz	Laptop
4	11/23/09	1479971944	"Utilities behind? We can help!" 405-209-0224 ask for Matthew Schultz	Laptop

<u>Count</u>	<u>Date</u>	<u>Craigslist #</u>	<u>Advertisement Title</u>	<u>Computer or Internet Source</u>
5	11/25/09	1481884348	"Help paying your auto mechanic bill" 405-209-0224 ask for Matthew Schultz	Staffmark
6	11/28/09	1486166030	"Tired of High Utility Bills? We can help" 405-209-0224 ask for Matthew Schultz	Laptop
7	12/4/09	1495080473	"Electric Help is here!" Payment Assistance Solutions is a organization who can help you find funds for electric, gas and water. Call Brandon Jackson 405-503-4526	Staffmark

All in violation of Title 18, United States Code, Section 1343, and Title 18, United States Code, Section 2.

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

The Grand Jury incorporates paragraphs 1-3.

7. From in or about August 2008 until on or about December 11, 2009, in the Western District of Oklahoma,

----- **WALLACE L. LAWRENCE, III, and**  
**SANDRA C. ACUNA** -----

knowingly and with intent to defraud used one or more unauthorized access devices (stolen credit card, debit card, and bank account numbers) to obtain \$1000 or more in things of value during a one-year period, and said use affected interstate commerce.

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

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

The Grand Jury incorporates paragraphs 1-3.

8. On or about October 6, 2009, in the Western District of Oklahoma,

----- **WALLACE L. LAWRENCE III, and**  
**SANDRA C. ACUNA** -----

knowingly and without lawful authority, used a means of identification (debit card number xxxx-xxxx-xxxx-4065) of another person, S.B., to pay a \$553.00 repair bill at Precision Tune Auto, 6600 N. May Ave., Oklahoma City, Oklahoma, with the intent to commit a felony under Oklahoma law, and said use affected interstate commerce.

All in violation of Title 18, United States Code, Section 1028(a)(7); and Title 18, United States Code, Section 2.

**COUNT 10**  
**(Aggravated Identity Theft)**

The Grand Jury incorporates paragraphs 1-3.

9. From in or about August 2008, and continuing until on or about December 11, 2009, in the Western District of Oklahoma,

----- **WALLACE L. LAWRENCE ,III, and**  
**SANDRA ACUNA** -----

knowingly and without lawful authority used means of identification (stolen credit card, debit card, and bank account numbers) of other persons during and in relation to the commission of the wire fraud scheme referenced in Counts 1-7.

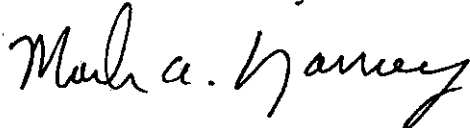
All in violation of Title 18, United States Code, Section 1028A(a)(1), and Title 18, United States Code, Section 2.

A TRUE BILL:



FOREPERSON OF THE GRAND JURY

SANFORD C. COATS  
United States Attorney



MARK A. YANCEY  
Assistant U.S. Attorney



BRANDON HALE  
Assistant U.S. Attorney