

## **Chase Branch Employee Worked With Heads and Pros in Sophisticated Joint Account Scheme**



Jaminata Starks, a 29-year-old Chase bank employee from Charlotte, North Carolina, faces federal charges for insider fraud

She didn't work alone in her scheme, she was recruited to work with a group of people called "Pros" and "Heads", each played their part in the scheme that extracted over \$120,000 from customers of the bank.

### **How The Scheme Took Place**

According to the federal indictment, Starks, who worked at a Charlotte branch of an unnamed financial institution (referred to as "Victim Bank"), is accused of misusing her position to orchestrate a fraud scheme between April 13, 2022, and May 23, 2022.

As a bank employee, Starks had the authority to open new joint accounts for existing customers and transfer funds between accounts, a responsibility she allegedly abused for personal gain.

For a \$1,000 payment, she would open accounts fraudulently and transfer funds from those accounts in accounts of people she worked with.

There were two types of people she worked with:

1. **The Pro** – A Pro-an abbreviation of "profile"-was a reference to a person who posed as an existing bank customer and sometimes uses counterfeit identification using the stolen PII of of an existing customer.
2. **The Head** – The pro worked with 3 different "heads". The heads were people who used their true identity and bank accounts to receive funds from the Pro's customer account. The heads would accompany the pro to the bank where Starks worked to open joint accounts with the heads as secondary accountholders.

## **The Mechanics Of The Fraud Involved Three Steps**

The indictment outlines the three step meticulously planned operation:

1. **Account Creation:** Utilizing her position and access to customer accounts, Starks allegedly created new joint accounts using stolen customer information.
2. **Fund Transfers:** Once the fraudulent accounts were established, Starks reportedly transferred money from legitimate customer accounts into these new, unauthorized accounts.
3. **Fund Withdrawal:** The final step involved Starks and her co-conspirators using various methods to withdraw the stolen funds from the fraudulent accounts.

Starks was charged with conspriing to defraud the United States and to violate the laws of the United States, which carries a maximum penalty of five years in prison.

She also faces four counts of making false entries in a bank record, which carries a max of up to 30 years in prison per count and four counts of aggravated identity theft, carrying a mandatory two-year prison sentence, consecutive to other prison term imposed per count.

AUG 20 2024

US DISTRICT COURT  
EASTERN DISTRICT OF NC

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF NORTH CAROLINA  
CHARLOTTE DIVISION

UNITED STATES OF AMERICA	)	DOCKET NO. 3:24-cr-164-KDB
	)	
v.	)	<b>BILL OF INDICTMENT</b>
	)	
JAMINATA STARIZS,	)	Violations: 18 U.S.C. § 2
Defendant	)	18 U.S.C. § 371
	)	18 U.S.C. § 1005
	)	18 U.S.C. § 1028A
	)	

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**THE GRAND JURY CHARGES:**

At the specified times and at all relevant times:

**Introduction**

- Beginning no later than April 13, 2022 and continuing through at least May 23, 2022, Defendant JAMINATA STARKS (STARKS) and others known and unknown to the grand jury, executed a scheme to fraudulently access customers' accounts at a federally insured financial institution (hereinafter "Bank No. 1") and withdraw funds without the customers' knowledge or consent. In the course of the scheme, STARKS, an employee and associate banker working in a Charlotte, North Carolina, branch of Bank No. 1 knowingly used Bank No. 1's customers' personal identifying information (PII) without their authority to open new bank accounts. As part of the scheme, STARKS made and caused to be made, false entries in the books and records of Bank No. 1. STARKS also knowingly transferred, attempted to transfer, and caused the transfer of at least \$120,000 from the custody and control of Bank No. 1 without lawful authority.
- STARKS, defendant herein, was a resident of Charlotte, North Carolina, who worked at a Bank No. 1 branch in Charlotte, North Carolina. STARKS had the authority to open bank accounts, transfer funds between Bank No. 1's customers' bank accounts, and initiate wire transfers with the approval of another Bank No. 1 employee.
- Coconspirator A was also known as "the Uncle" and a "Pro." Pro-an abbreviation of "profile"-was a reference to a person who poses as an existing bank customer and sometimes uses counterfeit identification with the stolen PII of existing bank customers and a photograph of the Pro.
- Individual No. 1, Individual No. 2, Individual No. 3, and Individual No. 4 were known as "Heads." Heads were persons who used their true identity and bank accounts to receive funds from Bank No. 1's customers' bank accounts. Heads would accompany a "Pro" to the Bank No. 1 branch where STARKS worked to open joint accounts in the name of an

existing Bank No. 1 customer and a Head. One or more of the coconspirators would thereafter access funds transferred from the existing customers' accounts.

5. Victim GC was a Bank No. 1 customer who resided in New Jersey.
6. Victim KA was a Bank No. 1 customer who resided in Florida.
7. Victim JM was a Bank No. 1 customer who resided in Florida.
8. Victim LB was a Bank No. 1 customer who resided in New York.
9. Bank No. 1 was a financial institution as defined in Title 18, United States Code, Section 20, the accounts and deposits of which were insured by the Federal Deposit Insurance Corporation ("FDIC").

**COUNT ONE**  
(Conspiracy)

10. The grand jury realleges and incorporates by reference herein, all of the allegations contained in paragraphs 1 through 9 of this Bill of indictment, and further alleges that:
11. Beginning no later than April 13, 2022 and continuing through at least May 23, 2022, in Mecklenburg County, within the Western District of North Carolina, and elsewhere, the defendant,

**JAMINATA STARKS,**

Coconspirator A, and others known and unknown to the grand jury did knowingly combine, conspire, confederate, and agree with one another to commit offenses against the United States.

***Objects of the Conspiracy***

12. It was a part and an object of the conspiracy that STARKS, Coconspirator A, and others would and did execute and attempt to execute a scheme and artifice to defraud Bank No. 1 and obtain monies owned by, and in the custody or control of Bank No. 1, by means of materially false and fraudulent pretenses, representations, and promises, in violation of Title 18, United States Code, Sections 1344(1) and (2).
13. It was a part and an object of the conspiracy that STARKS would, and did, make false entries and cause false entries to be made in the books, reports, and statements of Bank No. 1, to wit: account opening forms and signature cards purporting to list the name of an existing Bank No. 1 customer, when STARKS then knew that Coconspirator A or another person posing as an existing Bank No. 1 customer was the true person opening the accounts, in violation of Title 18, United States Code, Section 1005.
14. It was a part and an object of the conspiracy that STARKS, Coconspirator A, and others would, and did, knowingly use, without lawful authority, the means of identification of another person, to wit: the PII of actual Bank No. 1 customers, in violation of Title 18, United States Code, Section 1028A. Such use was made during and in relation to the felony offenses of making false entries in the records of a financial institution and bank

fraud in violation of Title 18, United States Code, Sections 1005 and 1344(1) and (2), respectively.

***Manner and Means***

15. STARKS, Coconspirator A, and others carried out the conspiracy through the following manner and means, among others:
  - a. Coconspirator A and one of the Heads, including Individual No. 1, Individual No. 2, and Individual No. 3, would meet STARKS in the Bank No. 1 branch where she worked. Coconspirator A would pose as a Bank No. 1 customer, using counterfeit identification with the existing customers' PII and his photograph. STARKS would use her position at Bank No. 1 to open joint accounts using the Bank No. 1 customers' PII presented by Coconspirator A and the true identities of the "Heads." STARKS and the conspirators would then transfer and cause the transfer of funds from the existing customers' accounts to joint accounts on which the Heads were cosigners. One or more of the conspirators would then access funds taken from the existing customers' accounts through the newly opened joint accounts.
  - b. STARKS was offered \$1,000 for each joint account she opened without the authority of an existing Bank No. 1 customer. STARKS was also offered and accepted bribes for initiating the transfer of funds and interstate wires.
  - c. STARKS, Coconspirator A, and others would knowingly use, without lawful authority, the PII of another person, to wit: actual Bank No. 1 customers.

***Overt Acts***

16. In furtherance of the conspiracy and to affect the objects thereof, there was committed by at least one of the conspirators, in the Western District of North Carolina and elsewhere, at least one of the following overt acts, among others:
  - a. On or about April 13, 2022, STARKS met Coconspirator A and Individual No. 1 at the Bank No. 1 branch where she worked and opened a joint account in the name of Victim GC and Individual No. 1. STARKS knew that Coconspirator A was using Victim GC's stolen PII to open the joint account.
  - b. On or about April 13, 2022, STARKS processed the transfer of \$30,000 from Victim GC's existing Bank No. 1 account into the joint account opened in the name of Victim GC and Individual No. 1.
  - c. On or about April 22, 2022, STARKS met Coconspirator A and Individual No. 2 at the Bank No. 1 branch where she worked and opened a joint account in the name of Victim KA and Individual No. 2. STARKS knew that Coconspirator A was using Victim KA's stolen PII to open the joint account.

- d. On or about April 22, 2022, one or more of the conspirators initiated the transfer of \$20,000 from Victim KA's existing account into the joint account.
- e. On or about April 26, 2022, STARKS met Coconspirator A and Individual No. 3 at the Bank No. 1 branch where she worked and opened a joint account in the name of Victim JM and Individual No. 3. STARKS knew that Coconspirator A was using Victim JM's stolen PII to open the joint account.
- f. On or about April 26, 2022, one or more of the conspirators initiated the transfer of \$50,000 from Victim JM's existing account into the joint account.
- g. On or about April 30, 2022, STARKS met Individual No. 4 at the Bank No. 1 branch where she worked and opened a joint account in the name of Victim LB and Individual No. 4. STARKS knew that Victim LB did not authorize use of her PII to open a joint account with Individual No. 4.
- h. On two separate dates between April 13, 2022 and May 23, 2022, the exact dates being unknown to the grand jury, Conspirator A paid STARKS \$1,900 and \$1,700 in U.S. currency, respectively, for her role in opening fraudulent joint accounts.

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

**COUNTS TWO THROUGH FIVE**

(False Entries in Bank Records)

- 17. The grand jury realleges and incorporates by reference herein, all of the allegations contained in paragraphs 1 through 9 of this Bill of Indictment, and further alleges that:
- 18. On or about the dates listed in Counts Two through Five below, in Mecklenburg County, within the Western District of North Carolina, and elsewhere, the defendant

**JAMINATA STARKS**

aided and abetted by Coconspirator A and others known and unknown to the grand jury, with the intent to injure, defraud, and deceive Bank No. 1, knowingly made false entries and caused false entries to be made in the books, reports, and statements of Bank No. 1, as alleged in each of Counts Two through Five, to wit: account opening forms and signature cards in the name of the victims listed in each of Counts Two through Five, all of whom were then existing Bank No. 1 customers, when in truth and in fact, as STARKS well knew, the existing customers had not authorized the joint accounts opened by STARKS.

<b>Count</b>	<b>Date</b>	<b>False Opening Form and Signature Card:</b>	<b>Location</b>
<b>TWO</b>	4/13/2022	Account No. X0693 in the name of Victim GC and Individual No. 1	Charlotte, NC
<b>THREE</b>	4/22/2022	Account No. X8156 in the name of Victim KA and Individual No. 2	Charlotte, NC
<b>FOUR</b>	4/26/2022	Account No. X0905 in the name of Victim JM and Individual No. 3	Charlotte, NC
<b>FIVE</b>	4/30/2022	Account No. X0531 in the name of Victim LB and Individual No. 4	Charlotte, NC

All in violation of Title 18, United States Code, Sections 1005 and 2.

**COUNTS SIX through NINE**  
(Aggravated Identity Theft)

19. The grand jury realleges and incorporates by reference herein, all of the allegations contained in paragraphs 1 through 9 of the Bill of Indictment, and further alleges that:
20. On or about the dates listed in Counts Six through Nine below, in Mecklenburg County, within the Western District of North Carolina, and elsewhere, the defendant

**JAMINATA STARKS**

aided and abetted by Coconspirator A and others known and unknown to the grand jury, did knowingly transfer, possess, and use, without lawful authority, a means of identification of another person, to wit, the names and PII of the victims listed in each of Counts Six through Nine below, during and in relation to felony violations of Title 18, United States Code, Sections 1005 and 1344, knowing that the means of identification belonged to another actual person as set forth below:

<b>Count</b>	<b>Date</b>	<b>Means of Identification</b>	<b>Location</b>
<b>SIX</b>	4/13/2022	Victim GC's name and Bank No. 1 account number	Charlotte, NC
<b>SEVEN</b>	4/22/2022	Victim KA's name and Bank No. 1 account number	Charlotte, NC
<b>EIGHT</b>	4/26/2022	Victim JM's name and Bank No. 1 account number	Charlotte, NC
<b>NINE</b>	4/30/2022	Victim LB's name and Bank No. 1 account number	Charlotte, NC

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

**NOTICE OF FORFEITURE AND FINDING OF PROBABLE CAUSE**

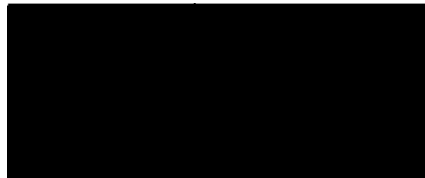
21. Notice is hereby given of 18 U.S.C. § 982 and 28 U.S.C. § 2461(c). Under Section 2461(c), criminal forfeiture is applicable to any offense for which forfeiture is authorized by any other statute, including but not limited to 18 U.S.C. § 981, and all specified unlawful activities listed or referenced in 18 U.S.C. § 1956(c)(7), which are incorporated as to proceeds by Section 981(a)(1)(C). The following property is subject to forfeiture in accordance with Section 982 and/or 2461(c):

- a. All property which constitutes or is derived from proceeds of the violations set forth in this Bill of Indictment; and
- b. If, as set forth in 21 U.S.C. § 853(p), any property described in (a) and (b) cannot be located upon the exercise of due diligence, has been transferred or sold to, or deposited with, a third party, has been placed beyond the jurisdiction of the court, has been substantially diminished in value, or has been commingled with other property which cannot be divided without difficulty, all other property of the defendant's to the extent of the value of the property described in (a).

22. The grand jury finds probable cause to believe that the following property is subject to forfeiture on one or more of the grounds stated above:

- a. A forfeiture money judgment in the amount of at least \$31,000, such amount constituting the proceeds of the violations set forth in this Bill of Indictment.

A TRUE BILL:



\_\_\_\_\_  
FOREPERSON

DENAJ. KING  
UNITED STATES ATTORNEY

A handwritten signature in cursive script, appearing to read "Michael E. Savage", written over a horizontal line.

MICHAEL E. SAVAGE  
ASSISTANT UNITED STATES ATTORNEY