# This Guy Masterminded A Four-Pronged Bank Fraud Scheme That Shows How Elaborate These Check Washing Cases Are Getting



Jalen Tylee Hill who is also known as "Roscoe Hill" was the mastermind behind a conveyer belt of fraud that shows just how fraud these check washing schemes are going.

And it went like this.

First, create a fake solar company website to harvest identities. Next, use those stolen identities to open bank accounts. Then steal checks from mailboxes across Georgia. Finally, alter those checks and deposit them into the fraudulent bank accounts.

The four-pronged approach was carried out by this 26 year old guy, and now he is going to spend close to 7 years in prison for his crimes.

# How He Pulled Off The Scheme – He Created A Fake Job Site To Steal Identities

Court documents reveal that Hills first order of business was to create a sophisticated fake solar panel installation recruiting website.

The site promised employment for people to help install solar panels. In realty though, when people would apply for jobs on the site, their data was just being harvested so that he could steal their identities.

Through the website, Hill collected driver's licenses, social security cards, birth certificates and other identification documents from 28 unsuspecting job applicants.

The website appeared completely legitimate and job seekers willingly uploaded their most sensitive documents believing they were applying for a legitimate position.

# **Step 2 - Opening Fraudulent Bank Accounts**

With his trove of stolen identities, Hill then moved to the second part of his scheme - opening up fraudulent bank accounts. These accounts, created using the stolen credentials, served as a way for him to deposit fraudulent items that would not raise suspicion because the identities were real.

# Step 3 – Steal Mail – Lots Of Checks

The third part of the fraud scheme involved stealing mail from residential and commercial mailboxes throughout Georgia and parts of Florida. Court records show that he stole hundreds of pieces of mail over a six-month period, specifically targeting envelopes that might contain checks.

I guess he knew what to look for.

"In one instance, he recorded himself on his cell phone stealing mail from boxes in front of a Walmart," said Rodney M. Hopkins, Inspector in Charge of the U.S. Postal Inspection Service's Atlanta Division. "He even boasted to associates via social media that he had stolen more than 100 individual checks and planned to expand his operation to Florida."

# Step 4 - Check Washing By Changing The Pay To Line

The final step of the fraud involved "check washing", by altering the stolen checks to change the payee information.

Hill and his fraud ring accomplices used two methods: physically changing the "Pay To" designation or using photoshop to digitally modify the checks to whatever they wanted the checks to contain. These altered checks were then deposited into the fraudulent accounts established earlier in the scheme.

# Recruiting Fraudsters – The 50/50 Split

In some cases, Hill used mules to deposit checks and he found willing participants on social media.

To get people to help him. Hill used Facebook to enlist at least 14 accomplices, offering to split proceeds 50/50 if they allowed stolen checks to be deposited in their accounts. For that he had them turn over their debit cards so that he could deposit the altered checks.

Many of the people that let their bank accounts be used have since received sentences ranging from supervised release to several months in prison.

The scheme targeted at least ten different banks, including Wells Fargo, PNC, Bank of America, Chase, and numerous community banks and credit unions.

Citizens Bank of Americus was hit particularly hard, with multiple fraudulent transactions documented between August and December 2021. In total, Hill's operation caused intended losses of approximately \$165,743.68 across more than ten financial institutions.

The scheme began unraveling when a local church in Sumter County reported mail theft and forged checks to authorities in December 2021. The subsequent investigation revealed Hill had been methodically documenting his own crimes.

"Between August and December 2021, he recorded multiple videos showing stolen checks and mail," said Sumter County Sheriff Eric Bryant. "The digital evidence, combined with the physical paper trail of altered checks and fraudulent accounts, created an overwhelming case."



### IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF GEORGIA ALBANY DIVISION

UNITED STATES OF AMERICA	:
<b>v.</b>	: CRIMINAL NO. 1:23-CR- <u>6</u>
JALEN TYLEE HILL aka ROSCOE HILL, TYAVIA DEASHIA RICHARDSON, QUONTAVIUS MARKEESE HILL, LAQUASHIA NICHOLE FRENCH, ACCACIA RENAE GORDON, DEKEYVIA MOASHA BLACKSHEAR, JENETTA SMALL, JAZMON LACE WHITEHEAD, CHASITY LACOLE WELLONS, KELBRESHA DANIELLE THOMAS, KIMBREYANNA ANDRANIQUE PEEPLES, VICTORIA LYNN CARTER,	: VIOLATION(S): 18 U.S.C. § 1344(2) 18 U.S.C. § 1028(a)(3) 18 U.S.C. § 1028(b)(2)(B) 18 U.S.C. § 1028A(a)(1) 18 U.S.C. § 2 18 U.S.C. § 1708 18 U.S.C. § 371
CHELSEA JA'NAY TULLIS,	
JANITA BRE'SHAYE TERRY, - SHANERIA SHARAE MURRAY,-	
MERCEDES LASHON BROWN,	

Defendants.

THE GRAND JURY CHARGES:

#### COUNTS 1-68 Bank Fraud

On or about the dates identified in the chart below, each row constituting a separate Count, in the Middle District of Georgia and elsewhere within this Court's jurisdiction, the Defendants, aided and abetted by each other and others known and unknown to the Grand Jury, knowingly executed and attempted to execute a scheme to obtain money, assets, and property under the custody and control of a financial institution, then insured by the Federal Deposit Insurance Corporation (FDIC), by means of materially false and fraudulent pretenses, representations, and promises, by negotiating and attempting to negotiate the following checks:

COUNT	DEFENDANTS	DATE	CHECK	VICTIM	AMOUNT
			NUMBER	BANK	
1	JALEN TYLEE HILL	7/30/2021	57272	Wells Fargo	\$1325
	aka ROSCOE HILL				
2	JALEN TYLEE HILL	8/2/2021	57272	Navy Federal	\$1325
	aka ROSCOE HILL				
3	JALEN TYLEE HILL	8/4/2021	2460	Capital One	\$2450
	aka ROSCOE HILL				
4	JALEN TYLEE HILL	8/4/2021	1194	Navy Federal	\$1500
	aka ROSCOE HILL				
5	JALEN TYLEE HILL	8/4/2021	2460	Wells Fargo	\$2450
	aka ROSCOE HILL				
	and				
	TYAVIA DEASHIA				
	RICHARDSON				
6	JALEN TYLEE HILL	8/5/2021	104	Robins	\$500
	aka ROSCOE HILL			Financial	
				Credit Union	
7	JALEN TYLEE HILL	8/30/2021	87441	Wells Fargo	\$1290
	aka ROSCOE HILL				
	and				
	TYAVIA DEASHIA				
	RICHARDSON				
8	JALEN TYLEE HILL	8/30/2021	114369	Bank of	\$1575
	aka ROSCOE HILL			America	
	and				
	QUONTAVIUS				
	MARKEESE HILL				
9	JALEN TYLEE HILL	8/30/2021	18266	Bank of	\$601.89
	aka ROSCOE HILL			America	
	and				
	QUONTAVIUS				
	MARKEESE HILL				
10	JALEN TYLEE HILL	9/2/2021	114275	PNC	\$1140.06
	aka ROSCOE HILL				
	and				
	LAQUASHIA				
	NICHOLE FRENCH				
11	JALEN TYLEE HILL	9/2/2021	1606	PNC	\$2000
	aka ROSCOE HILL				
	and				
	LAQUASHIA				
	NICHOLE FRENCH				
12	JALEN TYLEE HILL	9/3/2021	17876	Bank of	\$3250
	aka ROSCOE HILL			America	
	and				

	QUONTAVIUS				
	MARKEESE HILL				
13	JALEN TYLEE HILL	9/7/2021	1454	PNC	\$500
	aka ROSCOE HILL				
	and				
	LAQUASHIA				
	NICHOLE FRENCH				
14	JALEN TYLEE HILL	9/7/2021	1610	PNC	\$1000
14	aka ROSCOE HILL	<i>)    202</i> 1	1010		•
	and				
	LAQUASHIA				
	NICHOLE FRENCH				
1.7		0/7/2021	2076	PNC	\$587.85
15	JALEN TYLEE HILL	9/7/2021	3976	PINC	\$J01.0J
	aka ROSCOE HILL				
	and				
	LAQUASHIA				
	NICHOLE FRENCH				<b></b>
16	JALEN TYLEE HILL	9/14/2021	4553	PNC	\$2389
	aka ROSCOE HILL				
	and				
	ACCACIA RENAE				
	GORDON				
17	JALEN TYLEE HILL	9/16/2021	2956	PNC	\$75
	aka ROSCOE HILL				-
	and				
	ACCACIA RENAE				
	GORDON				
18	JALEN TYLEE HILL	9/17/2021	5335	Citizens	\$5000
10	aka ROSCOE HILL	<i><i><i>y</i>, <i>x</i>, <i>n</i>, <i>b</i>, <i>b</i>, <i>b</i>, <i>b</i>, <i>b</i>, <i>b</i>, <i>b</i>, <i>b</i></i></i>		Bank of	
	and			Americus	
	DEKEYVIA			2 1110110435	
	MOASHA				
	BLACKSHEAR				
10		9/21/2021	4774	PNC	\$4911
19	JALEN TYLEE HILL	9/21/2021	4//4	FINC	
	aka ROSCOE HILL				
	and				
	LAQUASHIA				
	NICHOLE FRENCH	0 10 1 10 0 0 1			
20	JALEN TYLEE HILL	9/21/2021	3768	PNC	\$3200
	aka ROSCOE HILL				
	and				
	ACCACIA RENAE				
	GORDON				
21	JALEN TYLEE HILL	9/22/2021	4553	Chase	\$2389
	aka ROSCOE HILL				
	and				

	OLIONIT'A VILLE				
	QUONTAVIUS				
	MARKEESE HILL	9/22/2021	28353	Chase	\$500
22	JALEN TYLEE HILL aka ROSCOE HILL	9/22/2021	20333	Chase	φ500
	and and				
	QUONTAVIUS				
	MARKEESE HILL				
23	JALEN TYLEE HILL	9/22/2021	1754	Chase	\$3850
23	aka ROSCOE HILL	<i>JI 221 202</i> 1	1754	Chube	\$2000
	and				
	DEKEYVIA				
	MOASHA				
	BLACKSHEAR				
24	JALEN TYLEE HILL	9/23/2021	600250	PNC	\$2142.02
1	aka ROSCOE HILL	2120,2052			
	and				
	ACCACIA RENAE				
	GORDON				
25	JALEN TYLEE HILL	9/23/2021	5447	PNC	\$525
	aka ROSCOE HILL				
	and				
	JENETTA SMALL				
26	JALEN TYLEE HILL	9/23/2021	7848	PNC	\$200
	aka ROSCOE HILL				
	and				
	JENETTA SMALL				
27	JALEN TYLEE HILL	9/23/2021	93416	PNC	\$165
	aka ROSCOE HILL				
	and				
	JENETTA SMALL				* * *
28	JALEN TYLEE HILL	9/23/2021	1501	PNC	\$94
	aka ROSCOE HILL				
	and				
	JENETTA SMALL				
29	JALEN TYLEE HILL	9/24/2021	1673	Chase	\$2500
	aka ROSCOE HILL				
	and				
	QUONTAVIUS				
	MARKEESE HILL	0/05/0001	40.72	TVC 11 Days	¢1000
30	JALEN TYLEE HILL	9/27/2021	4273	Wells Fargo	\$1000
	aka ROSCOE HILL				
	and				
	TYAVIA DEASHIA				
	RICHARDSON	0/20/2021	1696	PNC	\$2500
31	JALEN TYLEE HILL	9/29/2021	1686	rinu	φ <b>∠</b> 300
	aka ROSCOE HILL		1		

	and				
	JAZMON LACE				
	WHITEHEAD				
32	JALEN TYLEE HILL	9/30/2021	1754	PNC	\$3850
	aka ROSCOE HILL				
	and				
	JAZMON LACE				
	WHITEHEAD				
33	JALEN TYLEE HILL	10/1/2021	25032	PNC	\$605
55	aka ROSCOE HILL	10/1/2014			
	and				
	JAZMON LACE				
	WHITEHEAD				
34	JALEN TYLEE HILL	10/1/2021	25033	PNC	\$637.55
34	aka ROSCOE HILL	10/1/2021	23033	INC	Ψ057.55
	and		-		
	JAZMON LACE				
2.5	WHITEHEAD	10///2021	77007	DNC	\$1125.01
35	JALEN TYLEE HILL	10/4/2021	77237	PNC	\$1123.01
	aka ROSCOE HILL				
	and				
	JAZMON LACE			1	
	WHITEHEAD				<u> </u>
36	JALEN TYLEE HILL	10/6/2021	54757502	Wells Fargo	\$2489.67
	aka ROSCOE HILL				
	and				
	ACCACIA RENAE				
	GORDON				
37	JALEN TYLEE HILL	10/6/2021	54757455	Wells Fargo	\$398.55
	aka ROSCOE HILL				
	and				
	ACCACIA RENAE				
	GORDON				
38	JALEN TYLEE HILL	10/6/2021	54757458	Wells Fargo	\$398.55
	aka ROSCOE HILL				
	and				
	ACCACIA RENAE				
	GORDON				
39	JALEN TYLEE HILL	10/6/2021	54757454	Wells Fargo	\$398.55
	aka ROSCOE HILL				
	and				
	ACCACIA RENAE				
	GORDON				
40	JALEN TYLEE HILL	10/6/2021	54757451	Wells Fargo	\$398.55
70	aka ROSCOE HILL	10,0,2021			
	and				
			I	I	

	ACCACIA RENAE				
	GORDON				
41	JALEN TYLEE HILL	10/7/2021	54757575	Wells Fargo	\$2448.63
	aka ROSCOE HILL				
	and				
	ACCACIA RENAE				
	GORDON				
42	JALEN TYLEE HILL	10/7/2021	2629	Wells Fargo	\$1926.45
	aka ROSCOE HILL				
	and				
	ACCACIA RENAE				
	GORDON				
43	JALEN TYLEE HILL	10/7/2021	2626	Wells Fargo	\$1502.30
	aka ROSCOE HILL				
	and				
	ACCACIA RENAE				
	GORDON				
44	JALEN TYLEE HILL	10/7/2021	54757574	Wells Fargo	\$2448.63
	aka ROSCOE HILL				
	and				
	ACCACIA RENAE				
	GORDON				
45	JALEN TYLEE HILL	10/27/2021	25034	Robins	\$291.03
	aka ROSCOE HILL			Financial	
	and			Credit Union	
	JAZMON LACE				
	WHITEHEAD				
46	JALEN TYLEE HILL	10/28/2021	7848	Chase	\$2000
	aka ROSCOE HILL				
	and				
	CHASITY LACOLE				
	WELLONS				
47	JALEN TYLEE HILL	11/12/2021	1501	Chase	\$3000
	aka ROSCOE HILL				
	and				
	CHASITY LACOLE				
	WELLONS				
48	JALEN TYLEE HILL	11/12/2021	18266	PNC	\$601.89
	aka ROSCOE HILL				
	and				
	KELBRESHA				
	DANIELLE				
	THOMAS				
49	JALEN TYLEE HILL	11/12/2021	143	PNC	\$495
	aka ROSCOE HILL		1		
	and				
		L			

	KELBRESHA				
	DANIELLE				
	THOMAS				
50	JALEN TYLEE HILL	11/15/2021	1454	Chase	\$5000
	aka ROSCOE HILL				
	and				
	KELBRESHA				
	DANIELLE				
	THOMAS				
51	JALEN TYLEE HILL	11/16/2021	315	Chase	\$5000
51	aka ROSCOE HILL	11/10/2021	510	Cildude	<i></i>
	and				
	JAZMON LACE				
	WHITEHEAD				
<i>co</i>		11/17/2021	12699	Robins	\$3640
52	JALEN TYLEE HILL	11/1//2021	12099	Financial	\$30 <del>4</del> 0
	aka ROSCOE HILL			Credit Union	
	and			Credit Union	
	KIMBREYANNA				
	ANDRANIQUE				
·····	PEEPLES				
53	JALEN TYLEE HILL	11/17/2021	16065	Truist	\$5000
	aka ROSCOE HILL				
	and				
	VICTORIA LYNN				
	CARTER				
54	JALEN TYLEE HILL	11/19/2021	1454	Chase	\$5000
	aka ROSCOE HILL				
	and				
	CHASITY LACOLE				
	WELLONS				
55	JALEN TYLEE HILL	11/19/2021	25029	Chase	\$5000
	aka ROSCOE HILL				
	and	c.			
	KELBRESHA				
	DANIELLE				
	THOMAS				
56	JALEN TYLEE HILL	11/19/2021	4762	Chase	\$5000
20	aka ROSCOE HILL				
	and				
	CHELSEA JA'NAY				
	TULLIS				
57	JALEN TYLEE HILL	11/22/2021	3988	Bank of	\$2500
57	aka ROSCOE HILL	11/22/2021	5900	America	ψ2500
				Annonica	
	and	<u>]</u>	<u>l</u>	1	

	KIMBREYANNA				
	ANDRANIQUE				
	PEEPLES				
58	JALEN TYLEE HILL	11/22/2021	8507	Navy Federal	\$15468
50	aka ROSCOE HILL				
	and				
	JANITA				
	BRE'SHAYE TERRY				
		11/22/2021	8507	Navy Federal	\$15468
59	JALEN TYLEE HILL	11/22/2021	0307	INAVy Federal	Φ1 <b>5</b> 406
	aka ROSCOE HILL				
	and				
	JANITA				
	BRE'SHAYE TERRY				
60	JALEN TYLEE HILL	11/22/2021	2028	Truist	\$2000
	aka ROSCOE HILL				
	and				
	SHANERIA				
	SHARAE MURRAY				
61	JALEN TYLEE HILL	11/23/2021	1686	Truist	\$2500
	aka ROSCOE HILL				
	and				
	JANITA				
	BRE'SHAYE TERRY				
62	JALEN TYLEE HILL	11/23/2021	10199	Truist	\$3000
02	aka ROSCOE HILL	11,20,2021			•
	and				
	SHANERIA				
	SHARAE MURRAY		-		
(2	JALEN TYLEE HILL	11/26/2021	10907	Truist	\$2000
63		11/20/2021	10907	TTUISI	Φ2000
	aka ROSCOE HILL				
	and				
	JANITA				
	BRE'SHAYE TERRY		10.54		#0000
64	JALEN TYLEE HILL	12/1/2021	1051	Truist	\$2000
	aka ROSCOE HILL				
	and				
	MERCEDES				
	LASHON BROWN				
65	JALEN TYLEE HILL	12/2/2021	4126	Truist	\$2000
	aka ROSCOE HILL				
	and				
	MERCEDES				
	LASHON BROWN				-
66	JALEN TYLEE HILL	12/3/2021	12770	Truist	\$3217.50
	aka ROSCOE HILL				
	and				
<u> </u>		<u>I.</u>	1	1	

TOTAL:					\$165,743.68
				Americus	
	aka ROSCOE HILL			Bank of	
68	JALEN TYLEE HILL	12/15/2021	4126	Citizens	\$1000
	aka ROSCOE HILL			Bank	
67	JALEN TYLEE HILL	12/7/2021	4788	Woodforest	\$3000
	LASHON BROWN				
	MERCEDES				

In violation of Title 18, United States Code, Sections 1344(2), and 2.

### <u>COUNTS 69-82</u> Aggravated Identity Theft

On or about the dates identified in the chart below, each row constituting a separate Count,

in the Middle District of Georgia and elsewhere within this Court's jurisdiction, the Defendant,

# JALEN TYLEE HILL aka ROSCOE HILL

did knowingly transfer, possess, and use, without lawful authority, a means of identification of another person, during and in relation to a violation of Title 18, United States Code, Section 1344, knowing that the means of identification belonged to the following actual persons listed below:

COUNT	DATE	VICTIM	MEANS OF IDENTIFICATION
69	8/4/2021	T.R.	Debit Card
70	9/17/2021	D.B.	Debit Card
71	9/21/2021	L.F.	Debit Card
72	9/27/2021	T.R.	Debit Card
73	10/6/2021	A.G.	Debit Card
74	10/6/2021	A.G.	Debit Card
75	10/6/2021	A.G.	Debit Card
76	10/6/2021	A.G.	Debit Card
77	10/6/2021	A.G.	Debit Card
78	10/7/2021	A.G.	Debit Card
79	10/7/2021	A.G.	Debit Card
80	10/7/2021	A.G.	Debit Card
81	10/7/2021	A.G.	Debit Card
82	11/17/2021	K.P.	Debit Card

In violation of Title 18, United States Code, Section 1028A(a)(1).

## <u>COUNT 83</u> Fraud in Connection with Identification Documents

From on or about November 15, 2021 to on or about December 7, 2021, in the Albany Division of the Middle District of Georgia, the Defendant,

### JALEN TYLEE HILL aka ROSCOE HILL

knowingly possessed in and affecting interstate commerce with intent to use and transfer unlawfully five or more identification documents, other than those issued lawfully for the use of the Defendant, that is, drivers licenses, birth certificates, social security cards, and documents made and issued by and under the authority of the United States, the State of Georgia, and other states intended and commonly accepted for the purpose of identification of individuals.

In violation of Title 18, United States Code, Sections 1028(a)(3), 1028(b)(2)(B).

## <u>COUNTS 84-111</u> Aggravated Identity Theft

On or about the dates identified in the chart below, each row constituting a separate Count, in the Middle District of Georgia and elsewhere within this Court's jurisdiction, the Defendant,

### JALEN TYLEE HILL aka ROSCOE HILL

did knowingly possess, transfer, and use, without lawful authority, a means of identification of another person, during and in relation to a felony violation of Title 18, United States Code, Section 1028(a)(3) set forth in Count 83 of this Indictment, knowing that the means of identification belonged to the following actual persons listed below:

COUNT	DATE	VICTIM	MEANS OF IDENTIFICATION
84	11/15/2021 – 12/7/2021	E.R.	GA ID Card and SSN
85	11/15/2021 – 12/7/2021	S.G.	GA CDL and SSN
86	11/15/2021 – 12/7/2021	M.W.	GA DL and SSN

87	11/15/2021 – 12/7/2021	A.P.	GA DL and SSN
88	11/15/2021 - 12/7/2021	Y.S.	GA DL Permit and SSN
89	<u>11/15/2021</u> 12/7/2021	J.W.	SSN
90	<u>11/15/2021</u> <u>12/7/2021</u>	B.P.	Birth Certificate and GA DL Permit
91	<u>11/15/2021</u> <u>12/7/2021</u>	J.W.	GA DL Permit
92	11/15/2021 – 12/7/2021	J.F.	GA ID Card and SSN
93	11/15/2021 – 12/7/2021	K.W.	GA DL Permit and Birth Certificate
94	11/15/2021 – 12/7/2021	J.S.	GA ID Card and SSN
95	<u> </u>	E.B.	GA DL Permit and Birth Certificate
96	<u> </u>	D.J.	GA DL and Birth Certificate
97	11/15/2021 - 12/7/2021	Q.W.	GA ID Card and SSN
98	11/15/2021	D.M.	GA DL and SSN
99	11/15/2021 – 12/7/2021	K.W.	GA ID Card and SSN
100	<u>11/15/2021</u> 12/7/2021	D.B.	GA ID Card
101	11/15/2021 – 12/7/2021	C.P.	AL DL and SSN
102	11/15/2021 – 12/7/2021	J.M.	GA DL and SSN
103	11/15/2021 – 12/7/2021	D.G.	GA Voters ID Card and SSN
104	11/15/2021 – 12/7/2021	A.G.	GA DL and SSN
105	11/15/2021 - 12/7/2021	T.D.	GA DL and SSN
106	11/15/2021 - 12/7/2021	J.L.	GA ID Card
107	11/15/2021 - 12/7/2021	L.M.	GA ID Card and Birth Certificate
108	11/15/2021 - 12/7/2021	C.C.	GA ID Card and SSN
109	11/15/2021 - 12/7/2021	M.H.	GA DL and SSN

110	11/15/2021 – 12/7/2021	D.R.	TX ID Card and SSN	
111	11/15/2021 – 12/7/2021	A.B.	GA ID Card	

In violation of Title 18, United States Code, Section 1028A(a)(1).

#### <u>COUNT 112</u> Conspiracy to Possess Stolen Mail

From on or about July 12, 2021 to on or about December 22, 2021, in the Middle District of Georgia and elsewhere within this Court's jurisdiction, the Defendant,

#### JALEN TYLEE HILL aka ROSCOE HILL

did knowingly and intentionally conspire and agree with others known and unknown to the Grand Jury, to buy, receive, conceal, and unlawfully possess, any letter, postal card, package, bag, and mail, and any article and thing contained therein, which has been stolen, taken, embezzled, and abstracted, as herein described, knowing the same to have been stolen, taken, embezzled, and abstracted from an authorized depository for mail matter, in violation of Title 18, United States Code, Section 1708.

#### MANNER AND MEANS OF THE CONSPIRACY:

It was an object of the conspiracy that:

- 1. Defendant, JALEN TYLEE HILL aka ROSCOE HILL, would travel in, around, and outside of the Middle District of Georgia and steal mail out of residential and business mailboxes;
- 2. Defendant, JALEN TYLEE HILL aka ROSCOE HILL, would possess, conceal, and open said stolen mail in order to obtain bank checks;
- 3. Defendant, JALEN TYLEE HILL aka ROSCOE HILL, would forge said stolen bank checks and recruit other persons known and unknown to the Grand Jury via social media

to allow Defendant to negotiate and attempt to negotiate said checks into those other persons' bank accounts in order to split the ill-begotten gains and conceal Defendant's identity.

#### OVERT ACTS

- 4. In furtherance of the conspiracy, and to effect the objects of the conspiracy, the Defendant, JALEN TYLEE HILL aka ROSCOE HILL, and others known and unknown to the Grand Jury, did commit and cause to be committed, the following overt acts, among others, in the Middle District of Georgia:
  - a. On or about August 14, 2021, Defendant, JALEN TYLEE HILL aka ROSCOE HILL, did capture a video file on his cell phone depicting a bank check stolen from a mailbox;
  - b. On or about October 25, 2021, Defendant, JALEN TYLEE HILL aka ROSCOE HILL, did capture a video file on his cell phone depicting a bank check stolen from a mailbox;
  - c. On or about October 26, 2021, Defendant, JALEN TYLEE HILL aka ROSCOE HILL, did capture a video file on his cell phone depicting a birthday card and United States currency stolen from a mailbox;
  - d. On or about October 29, 2021, Defendant, JALEN TYLEE HILL aka ROSCOE HILL, did capture a video file on his cell phone depicting a Wells Fargo bank statement stolen from a mailbox;
  - e. On or about December 1, 2021, Defendant, JALEN TYLEE HILL aka ROSCOE HILL, did capture a video file on his cell phone depicting multiple bank checks stolen from a mailbox and exclaiming said checks were stolen out of a mailbox

located in front of Walmart;

- f. Between on or about December 4, 2021 and on or about December 9, 2021, Defendant, JALEN TYLEE HILL aka ROSCOE HILL, did inform another individual via social media that he has stolen more than 100 individual checks out of mailboxes; that he has stolen mail out of mailboxes in Americus, Georgia; and that he intends to steal more mail out of mailboxes in Florida;
- g. On or about December 15, 2021, 2021, Defendant, JALEN TYLEE HILL aka ROSCOE HILL, did capture multiple video files on his cell phone depicting multiple bank checks stolen from mailboxes;
- h. The chart below summarizes the bank checks depicted in the above-mentioned videos:

Bank on Check	Check Dated	Check Amount
Citizens Bank of Americus	7/12/2021	\$2,500
Five Star Credit Union	7/29/2021	\$165
BB&T	7/30/2021	\$501
US Bank	8/1/2021	\$126
Ameris Bank	8/3/2021	\$650
Atlantic Capital Bank	8/5/2021	\$600
Citizens Bank of Americus	8/6/2021	\$40
Citizens Bank of Americus	8/12/2021	\$70
Citizens Bank of Americus	8/12/2021	\$125
Citizens Bank of Americus	8/13/2021	\$500
Citizens Bank of Americus	8/13/2021	\$55

Citizens Bank of Americus	8/15/2021	\$650
One South	8/20/2021	\$1,140
Fidelity	8/23/2021	\$1,290
SunTrust	8/24/2021	\$6,994
JP Morgan Chase	8/25/2021	\$408.52
Regions	8/25/2021	\$587.85
SB&T	8/27/2021	\$601.89
Citizens Bank of Americus	8/30/2021	\$104
Citizens Bank of Americus	8/30/2021	\$55
Synovus	8/30/2021	\$75
TD Bank	8/31/2021	\$3,200
TD Bank	8/31/2021	\$3,850
Fidelity Bank	9/1/2021	\$875
Suntrust	9/1/2021	\$268
US Bank	9/1/2021	\$67
Citizens Bank of Americus	9/3/2021	\$30
Citizens Bank of Americus	9/3/2021	\$50
Citizens Bank of Americus	9/3/2021	\$62
First Citizens Bank	9/3/2021	\$2,013
Wells Fargo	9/7/2021	\$3,150
BB&T	9/8/2021	\$75
PNC Bank	9/8/2021	\$525

Old Plank Trail Community Bank	9/9/2021	\$5,124
BB&T	9/10/2021	\$570
Synovus	9/10/2021	\$2,389
Synovus	9/10/2021	\$85
Colony Bank	9/16/2021	\$86
Synovus	9/16/2021	\$450
Synovus	9/16/2021	\$200
Synovus	9/16/2021	\$300
BB&T	9/17/2021	\$570
South GA Banking Company	9/17/2021	\$1,125.01
Wells Fargo	9/17/2021	\$11
BB&T	9/20/2021	\$500
Synovus	9/21/2021	\$5,000
Synovus	9/21/2021	\$291.03
Synovus	9/21/2021	\$605
Synovus	9/21/2021	\$637.55
Synovus	9/21/2021	\$39
Citizens Bank of Americus	9/22/2021	\$25
United Community Bank	9/22/2021	\$35
Regions	9/24/2021	\$13
Synovus	9/29/2021	\$114
Synovus	9/29/2021	\$113
Citizens Bank of Americus	10/5/2021	\$130

Citizens Bank of Americus	10/13/2021	\$39
Smart Bank	10/19/2021	\$175
Synovus	10/19/2021	\$930
First Bank	10/20/2021	\$11,149.60
Branch Banking and Trust	10/21/2021	\$101
Citizens Bank of Americus	10/22/2021	\$850
United Community Bank	11/1/2021	\$100
Fifth Third Bank	11/2/2021	\$2,112
Bank of New York Mellon	11/4/2021	\$300
USAA Federal Savings Bank	11/4/2021	\$2,000
Planters First Bank	11/11/2021	\$3,000
City National Bank	11/12/2021	\$94
Synovus	11/15/2021	\$5,000
SunTrust	11/16/2021	\$5,000
Wells Fargo	11/16/2021	\$2,000
Wells Fargo	11/16/2021	\$155
Synovus	11/17/2021	\$1,690
Smart Bank	11/18/2021	\$175
Synovus	11/18/2021	\$3,000
Bank of America	11/19/2021	\$360
Bank of America	11/19/2021	\$821
Bank of America	11/19/2021	\$270
Synovus	11/19/2021	\$5,000

11/19/2021	\$5,000
11/20/2021	\$343
11/21/2021	\$135
11/22/2021	\$500
11/23/2021	\$321
11/23/2021	\$2,500
11/23/2021	\$1,400
11/24/2021	\$330
11/29/2021	12,504.80
11/30/2021	\$3,000
12/1/2021	\$50
12/1/2021	\$3,218
12/1/2021	\$1,000
-	11/21/2021   11/22/2021   11/23/2021   11/23/2021   11/23/2021   11/23/2021   11/23/2021   11/24/2021   11/29/2021   11/2021   12/1/2021   12/1/2021

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

A TRUE BILL.

*s/ Foreperson of the Grand Jury* FOREPERSON OF THE GRAND JURY

PRESENTED BY:

PETER D. LEARY UNITED STATES ATTORNEY

MATTHEW REDAVID ASSISTANT UNITED STATES ATTORNEY

Filed in open court this \_\_\_\_ 15 day of A.D. 20 7

**Deputy** Clerk