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CLERK U.S. DISTRICT COURT  
CENTRAL DIST. OF CALIF.  
RIVERSIDE

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UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA  
September 2019 Grand Jury

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.  
  
STEVEN MICHAEL BANKS HUBBARD  
JR.,  
aka "Man" and  
"Marcus,"  
  
Defendant.

EDCR 19-0399-CAS

I N D I C T M E N T

[18 U.S.C. § 1344(2): Bank Fraud;  
18 U.S.C. § 1028A(a)(1):  
Aggravated Identity Theft]

The Grand Jury charges:

COUNTS ONE THROUGH NINE

[18 U.S.C. §§ 1344(2), 2(b)]

A. INTRODUCTORY ALLEGATIONS

1. At times relevant to this Indictment, Wells Fargo Bank, N.A. ("Wells Fargo") was a financial institution insured by the Federal Deposit Insurance Corporation.

B. SCHEME TO DEFRAUD

2. Beginning on a date unknown, but no later than in or about May 2015, and continuing through on or about July 16, 2019, in Riverside and San Bernardino Counties, within the Central District of

1 California, and elsewhere, defendant STEVEN MICHAEL BANKS HUBBARD  
2 JR., also known as "Man" and "Marcus," and others known and unknown  
3 to the Grand Jury, knowingly and with the intent to defraud, executed  
4 and attempted to execute a scheme to obtain moneys, funds, credits,  
5 assets, and other property owned by and in the custody and control of  
6 Wells Fargo by means of materially false and fraudulent pretenses,  
7 representations and promises, and the concealment of material facts.

8 3. The fraudulent scheme operated, in substance, as follows:

9 a. Defendant HUBBARD, together with others known and  
10 unknown to the Grand Jury, would find individuals who either already  
11 had an existing Wells Fargo checking account or agreed to open up a  
12 checking account at Wells Fargo.

13 b. Defendant HUBBARD, together with others known and  
14 unknown to the Grand Jury, would convince those individuals to turn  
15 over control of their Wells Fargo checking accounts to defendant  
16 HUBBARD by giving him the account's automated teller machine ("ATM")  
17 cards, their personal identification numbers, and their personal  
18 identifying information.

19 c. Defendant HUBBARD and others would deposit cash,  
20 typically more than \$2,000, into the Wells Fargo checking account.

21 d. Defendant HUBBARD and others would withdraw at least  
22 some of the deposited amount from the Wells Fargo checking account  
23 and would make purchases using the debit card for the account.

24 e. Defendant HUBBARD would pose as the holder of the  
25 checking account and call Wells Fargo to report that the cash  
26 withdrawals and purchases were unauthorized.

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1 f. Relying on the representation that the cash  
2 withdrawals and purchases were unauthorized, Wells Fargo would grant  
3 a provisional credit of funds into the Wells Fargo checking account.

4 g. In some instances, defendant HUBBARD would again pose  
5 as the holder of the Wells Fargo checking account to make purchases  
6 and withdraw, as cash, the provisional credit of funds from the Wells  
7 Fargo checking account.

8 h. Defendant HUBBARD would call Wells Fargo to report  
9 that the cash withdrawal and purchases were unauthorized and to  
10 obtain a provisional credit of funds into the Wells Fargo checking  
11 account.

12 i. Defendant HUBBARD would repeat this process until  
13 Wells Fargo closed the checking account based on suspected fraud.

14 C. EXECUTIONS OF THE FRAUDULENT SCHEME

15 4. On or about the following dates, within the Central  
16 District of California, and elsewhere, defendant HUBBARD, together  
17 with others known and unknown to the Grand Jury, committed and  
18 willfully caused others to commit the following acts, each of which  
19 constituted an execution and attempted execution of the fraudulent  
20 scheme:

21 Counts Related to V.A.

COUNT	DATE	ACT
ONE	12/19/2017	Withdrawal of \$800 from the Wells Fargo checking account number ending in 2203 in V.A.'s name.

COUNT	DATE	ACT
TWO	12/19/2017	Withdrawal of \$700 from the Wells Fargo checking account number ending in 2203 in V.A.'s name.
THREE	12/19/2017	Reimbursement by Wells Fargo of \$2,295.48 into checking account number ending in 2203 in V.A.'s name by reporting that several unauthorized charges totaling \$2,295.48 had been incurred against that account.

**Counts Related to Q.M.**

COUNT	DATE	ACT
FOUR	3/18/2019	Purchase of \$1,981.78 using debit card ending in 0156 linked to Wells Fargo checking account number ending in 4431 in Q.M.'s name.
FIVE	3/19/2019	Reimbursement by Wells Fargo of \$2,782.67 into checking account number ending in 4431 in Q.M.'s name by reporting that several unauthorized charges had been incurred against that account.

**Counts Related to D.H.**

COUNT	DATE	ACT
SIX	5/1/2019	Withdrawal of \$800 from the Wells Fargo checking account number ending in 9759 in D.H.'s name.

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COUNT	DATE	ACT
SEVEN	5/1/2019	Withdrawal of \$300 from the Wells Fargo checking account number ending in 9759 in D.H.'s name.
EIGHT	5/2/2019	Reimbursement by Wells Fargo of \$2,764.61 into checking account number ending in 9759 in D.H.'s name by reporting that several unauthorized charges had been incurred against that account.
NINE	5/2/2019	Withdrawal of \$2,100 from the Wells Fargo checking account number ending in 9759 in D.H.'s name.

COUNT TEN

[18 U.S.C. § 1028A(a)(1)]

On or about December 19, 2017, in Riverside and San Bernardino Counties, within the Central District of California, and elsewhere, defendant STEVEN MICHAEL BANKS HUBBARD JR., also known as "Man" and "Marcus," and others known and unknown to the Grand Jury, knowingly used, without lawful authority, a means of identification that defendant HUBBARD knew belonged to another person, namely, V.A.'s name, during and in relation to the offense of Bank Fraud, a felony violation of Title 18, United States Code, Section 1344(2), as charged in Count Three of this Indictment.

COUNT ELEVEN

[18 U.S.C. § 1028A(a)(1)]

On or about March 19, 2019, in Riverside and San Bernardino Counties, within the Central District of California, and elsewhere, defendant STEVEN MICHAEL BANKS HUBBARD JR., also known as "Man" and "Marcus," and others known and unknown to the Grand Jury, knowingly used, without lawful authority, a means of identification that defendant HUBBARD knew belonged to another person, namely, Q.M.'s name, during and in relation to the offense of Bank Fraud, a felony violation of Title 18, United States Code, Section 1344(2), as charged in Count Five of this Indictment.

A TRUE BILL

*/s/*

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Foreperson

NICOLA T. HANNA  
United States Attorney

*Brandon Fox*

BRANDON D. FOX  
Assistant United States Attorney  
Chief, Criminal Division

JOSEPH B. WIDMAN  
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