UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 25-cr-60273-Huck/Valle
18 U.S.C. § 1349
18 U.S.C. § 1344
18 U.S.C. § 1028A(a)(1)
18 U.S.C. § 982(a)(2)

UNITED STATES OF AMERICA

vs.

LINDSLEY CHAMBERS JR,
ROBERT MCKINLEY THOMAS,
JUSTIN ANTHONY SEIVRIGHT,
TACAVEON TRAVON CARSON,
PHILLIP MICHAEL VALCIN JR,
BRANDON JEROME SNIDER, and
PATRICK MARQUIS AYTON JR,

Defendants.
_______________________________________/

INDICTMENT

The Grand Jury charges that:

GENERAL ALLEGATIONS

At all times relevant to this Indictment:

Financial Institution

1. Bank of America, N.A. ("Bank of America") was a financial institution whose accounts were insured by the Federal Deposit Insurance Corporation ("FDIC").

Unemployment Insurance

2. Unemployment Insurance ("UI") was a joint state and federal program that provided monetary benefits to eligible beneficiaries. UI benefits were intended to provide

temporary financial assistance to lawful workers who were unemployed through no fault of their own.

3. Beginning in or around March 2020, in response to the COVID-19 pandemic, the Coronavirus Aid, Relief, and Economic Security (CARES) Act of 2020 created several federal programs, including the Pandemic Unemployment Assistance Program, Federal Pandemic Unemployment Compensation, and the Lost Wages Assistance Program, which expanded UI eligibility and increased UI benefits to individuals who were unemployed because of the COVID-19 pandemic ("Pandemic UI Benefits").

California Employment Development Department

4. The California Employment Development Department ("CA-EDD") was an agency of the State of California that administered UI benefits for residents of California, including Pandemic UI Benefits. Persons applying for UI benefits in California, including Pandemic UI Benefits, were required to reside in the State of California and submit to CA-EDD an application for the benefits. Applications for Pandemic UI Benefits were submitted online.

5. A claimant for Pandemic UI Benefits was required to answer various questions on the claimant's application to establish the claimant's eligibility for the benefits. Among other things, the claimant was required to provide personally identifiable information ("PII"), including the claimant's name, date of birth, and social security number, and certify to CA-EDD under penalty of perjury that the COVID-19 pandemic had directly and adversely affected the claimant's employment. Claimants applying for Pandemic UI Benefits did not need to submit any supporting documents to CA-EDD with their applications. Individuals who were employed, retired, or incarcerated were not eligible for UI benefits, including Pandemic UI Benefits. The

CA-EDD relied upon the information in the application to determine the claimant's eligibility for benefits.

6. Additionally, to successfully file a claim for Pandemic UI Benefits with CA-EDD, the claimant had to pass an identity verification provided by ID.me, Inc. ("ID.me"), a third-party online identity verification service. The ID.me. identity verification process required the claimant to provide the claimant's PII, a government-issued form of identification, and a selfie photograph taken in real-time. During the ID.me identity verification process, a text message was sent to the phone number provided by the applicant that contained a link that allowed the claimant to provide the required photograph of the claimant's government-issued form of identification and take a real-time selfie photograph. ID.me's facial recognition software was then used to compare the applicant's real-time selfie photograph with the photograph on the claimant's government-issued form of identification.

7. If CA-EDD approved an application and granted Pandemic UI Benefits to the claimant, a prepaid debit account at Bank of America was created in the claimant's name ("BOA Debit Account") into which CA-EDD deposited the claimant's Pandemic UI Benefits. The Pandemic UI Benefits deposited in the BOA Debit Account were moneys and funds under the custody and control of Bank of America.

8. To access the Pandemic UI Benefits that were deposited in the BOA Debit Account, Bank of America issued a debit card ("BOA Debit Card") in the name of the claimant that was linked to the claimant's BOA Debit Account containing the money and funds from the Pandemic UI Benefits. The BOA Debit Card was mailed to an address provided by the claimant and could be activated by telephone or online. Once activated, the BOA Debit Card could be used to withdraw Pandemic UI Benefits from the BOA Debit Account in the form of cash dispensed from

automated teller machines ("ATMs"), including ATMs that Bank of America operated. The BOA Debit Cards could also be used to make purchases by debiting the claimant's Pandemic UI Benefits from the BOA Debit Account in point-of-sale transactions.

9. Visa Debt Processing Solutions ("Visa DPS") was a vendor contracted by Bank of America to process all transactions on UI prepaid debit cards, including those issued by the CA-EDD. Visa DPS had two platform processor data centers that housed all of the UI prepaid card data for Bank of America. Those data centers were located in Ashburn, Virginia and Highlands Ranch, Colorado. Any transaction made on a Bank of America UI prepaid debit card, including loading of funds, point-of-sale transactions, and ATM withdrawals, passed through one of those two data processor centers.

The Defendants

10. **LINDSLEY CHAMBERS JR** was a resident of Broward County, Florida.

11. **ROBERT MCKINLEY THOMAS** was a resident of Broward County, Florida.

12. **JUSTIN ANTHONY SEIVRIGHT** was a resident of Broward County, Florida.

13. **TACAVEON TRAVON CARSON** was a resident of Broward County, Florida.

14. **PHILLIP MICHAEL VALCIN JR** was a resident of Broward County, Florida.

15. **BRANDON JEROME SNIDER** was a resident of Broward County, Florida.

16. **PATRICK MARQUIS AYTON JR** was a resident of Broward County, Florida.

COUNT 1
Conspiracy to Commit Bank Fraud and Wire Fraud
(18 U.S.C. § 1349)

17. The General Allegations section of this Indictment is re-alleged and fully incorporated herein by reference.

18. From in or around September 2020, and continuing through in or around May 2022, in Broward County, in the Southern District of Florida, and elsewhere, the defendants,

LINDSLEY CHAMBERS JR,
ROBERT MCKINLEY THOMAS,
JUSTIN ANTHONY SEIVRIGHT,
TACAVEON TRAVON CARSON,
PHILLIP MICHAEL VALCIN JR
BRANDON JEROME SNIDER, and
PATRICK MARQUIS AYTON JR,

did willfully, that is, with the intent to further the objects of the conspiracy, and knowingly combine, conspire, confederate, and agree with each other and with others known and unknown to the Grand Jury to commit certain offenses against the United States, that is:

a) to knowingly, and with intent to defraud, execute, and cause the execution of, a scheme and artifice to obtain moneys and funds owned by, and under the custody and control of, one or more financial institutions, including Bank of America, by means of false and fraudulent pretenses, representations, and promises relating to a material fact, in violation of Title 18, United States Code, Section 1344(2); and

b) to knowingly, and with intent to defraud, devise, and intend to devise, a scheme and artifice to defraud, and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, knowing that they were false and fraudulent when made, and, for the purpose of executing the scheme and artifice, transmitting and causing to be transmitted in interstate and foreign commerce, by means of wire communication, certain writings, signs, signals, pictures and sounds, in violation of Title 18, United States Code, Section 1343.

PURPOSE OF THE CONSPIRACY

19. It was the purpose of the conspiracy for the defendants and their co-conspirators to unlawfully enrich themselves by, among other things, (a) submitting and causing the submission of applications to CA-EDD for UI benefits, including Pandemic UI Benefits, which contained materially false and fraudulent pretenses, representations, and promises; (b) causing CA-EDD to disburse and deposit UI benefits, including Pandemic UI Benefits, to financial institutions, including Bank of America, based upon materially false and fraudulent pretenses, representations, and promises; (c) obtaining UI benefits, including Pandemic UI Benefits, in the form of moneys and funds owned by, and under the custody and control of, financial institutions, including Bank of America, by means of false and fraudulent pretenses, representations, and promises relating to a material fact; and (d) using fraudulently obtained UI benefits, including Pandemic UI Benefits, for their personal use and the use and benefit of others.

MANNER AND MEANS OF CONSPIRACY

The manner and means by which the defendants and their co-conspirators sought to accomplish the objects and purpose of the conspiracy included, among others, the following:

20. One or more members of the conspiracy obtained without lawful authority PII of victims of identity theft ("Identity Theft Victims"), including names, dates of birth, and social security numbers.

21. One or more members of the conspiracy created counterfeit driver licenses and other fictitious forms of identification (collectively, "Counterfeit IDs") using PII of Identity Theft

Victims and photographs of co-conspirators, including **LINDSLEY CHAMBERS JR** and **ROBERT MCKINLEY THOMAS**.

22. One or more members of the conspiracy submitted and caused the submission of false and fraudulent applications to CA-EDD for Pandemic UI Benefits using, among other things, PII of Identity Theft Victims.

23. In connection with the submission of false and fraudulent applications to CA-EDD for Pandemic UI Benefits and identity verification related thereto, **LINDSLEY CHAMBERS JR** and one or more members of the conspiracy submitted to ID.me real-time selfie photographs of **LINDSLEY CHAMBERS JR** and photographs of Counterfeit IDs bearing a picture of **LINDSLEY CHAMBERS JR** and PII of Identity Theft Victims.

24. Based upon false and fraudulent applications for Pandemic UI Benefits submitted to CA-EDD using PII of Identity Theft Victims, one or more members of the conspiracy caused CA-EDD to disburse such Pandemic UI Benefits to financial institutions, including Pandemic UI Benefits in the approximate amount of $2,095,831 deposited to Bank of America in BOA Debit Accounts for which Bank of America issued BOA Debit Cards in the names of Identity Theft Victims.

25. **LINDSLEY CHAMBERS JR, ROBERT MCKINLEY THOMAS, JUSTIN ANTHONY SEIVRIGHT, TACAVEON TRAVON CARSON, PHILLIP MICHAEL VALCIN JR, BRANDON JEROME SNIDER, PATRICK MARQUIS AYTON JR,** and other co-conspirators known and unknown to the Grand Jury, fraudulently obtained and received Pandemic UI Benefits from CA-EDD in the form of moneys and funds under the custody and control of financial institutions, including Bank of America, by using BOA Debit Cards issued in

the names of Identity Theft Victims without lawful authority to make cash withdrawals of such moneys and funds from BOA Debit Accounts at ATMs located in the Southern District of Florida.

26. **BRANDON JEROME SNIDER** and other co-conspirators known and unknown to the Grand Jury fraudulently obtained and received Pandemic UI Benefits from CA-EDD in the form of money and funds under the custody and control of financial institutions, including Bank of America, by using BOA Debit Cards issued in the names of Identity Theft Victims without lawful authority to (a) make purchases of goods and services, including commercial airline reservations, at point of sale transactions that debited such moneys and funds from BOA Debit Accounts; and (b) transfer such money and funds from BOA Debit Accounts at Bank of America to accounts at other financial institutions.

All in violation of Title 18, United States Code, Section 1349.

COUNTS 2-22
Bank Fraud
(18 U.S.C. § 1344)

27. The General Allegations section of this Indictment is re-alleged and fully incorporated herein by reference.

28. From in or around September 2020, and continuing through in or around May 2022, in Broward County, in the Southern District of Florida, and elsewhere, the defendants,

LINDSLEY CHAMBERS JR,
ROBERT MCKINLEY THOMAS,
JUSTIN ANTHONY SEIVRIGHT,
TACAVEON TRAVON CARSON,
PHILLIP MICHAEL VALCIN JR,
BRANDON JEROME SNIDER, and
PATRICK MARQUIS AYTON JR,

as specified in each count below, did knowingly, and with intent to defraud, execute, and cause the execution of, a scheme and artifice to obtain moneys and funds owned by, and under the custody and control of, one or more financial institutions, including Bank of America, by means of false and fraudulent pretenses, representations, and promises relating to a material fact, in violation of Title 18, United States Code, Section 1344(2).

PURPOSE OF THE SCHEME AND ARTIFICE

29. It was a purpose of the scheme and artifice for the defendants and their accomplices to unlawfully enrich themselves by, among other things, (a) submitting and causing the submission of applications to CA-EDD for UI benefits, including Pandemic UI Benefits, that contained materially false and fraudulent pretenses, representations, and promises; (b) causing CA-EDD to disburse and deposit UI benefits, including Pandemic UI Benefits, to financial institutions, including Bank of America, based upon materially false and fraudulent pretenses, representations, and promises; (c) obtaining UI benefits, including Pandemic UI Benefits, in the form of moneys and funds owned by, and under the custody and control of, financial institutions, including Bank of America, by means of false and fraudulent pretenses, representations, and promises relating to a material fact; and (d) using fraudulently obtained UI benefits, including Pandemic UI Benefits, for their personal use and the use and benefit of others.

THE SCHEME AND ARTIFICE

30. The Manner and Means section of Count 1 of the Indictment is re-alleged and incorporated by reference as though fully set forth herein as a description of the scheme and artifice.

EXECUTION OF THE SCHEME AND ARTIFICE

31. On or about the dates specified as to each count below, the defendants, as specified in each count below, did execute, and cause the execution of, the above-described scheme and artifice to defraud, as more particularly described below:

COUNT	APPROX. DATE	DEFENDANT	EXECUTION
2	01/17/2021	**BRANDON JEROME SNIDER**	ATM withdrawal of $1,000 from a prepaid debit account at Bank of America using a Bank of America Visa debit card ending in 0540 issued in the name of S.E.
3	01/19/2021	**ROBERT MCKINLEY THOMAS**	ATM withdrawal of $1,000 from a prepaid debit account at Bank of America using a Bank of America Visa debit card ending in 8562 issued in the name of N.R.
4	01/23/2021	**BRANDON JEROME SNIDER**	ATM withdrawal of $1,000 from a prepaid debit account at Bank of America using a Bank of America Visa debit card ending in 0540 issued in the name of S.E.
5	01/27/2021	**BRANDON JEROME SNIDER**	ATM withdrawal of $1,000 from a prepaid debit account at Bank of America using a Bank of America Visa debit card ending in 0540 issued in the name of S.E.
6	01/30/2021	**ROBERT MCKINLEY THOMAS**	ATM withdrawal of $1,000 from a prepaid debit account at Bank of America using a Bank of America Visa debit card ending in 5157 issued in the name of R.H.
7	01/31/2021	**TACAVEON TRAVON CARSON**	ATM withdrawal of $1,000 from a prepaid debit account at Bank of America using a Bank of America Visa debit card ending in 5157 issued in the name of R.H.

COUNT	APPROX. DATE	DEFENDANT	EXECUTION
8	05/18/2021	**TACAVEON TRAVON CARSON**	ATM withdrawal of $1,000 from a prepaid debit account at Bank of America using a Bank of America Visa debit card ending in 1318 issued in the name of J.M.
9	05/18/2021	**PHILLIP MICHAEL VALCIN JR**	ATM withdrawal of $1,000 from a prepaid debit account at Bank of America using a Bank of America Visa debit card ending in 2734 issued in the name of J.E.
10	06/02/2021	**TACAVEON TRAVON CARSON**	ATM withdrawal of $1,000 from a prepaid debit account at Bank of America using a Bank of America Visa debit card ending in 0660 issued in the name of M.S.
11	06/10/2021	**LINDSLEY CHAMBERS JR**	ATM withdrawal of $1,000 from a prepaid debit account at Bank of America using a Bank of America Visa debit card ending in 7242 issued in the name of E.B.
12	06/18/2021	**LINDSLEY CHAMBERS JR**	ATM withdrawal of $1,000 from a prepaid debit account at Bank of America using a Bank of America Visa debit card ending in 7242 issued in the name of E.B.
13	06/27/2021	**PHILLIP MICHAEL VALCIN JR**	ATM withdrawal of $1,000 from a prepaid debit account at Bank of America using a Bank of America Visa debit card ending in 5217 issued in the name of G.F.
14	06/29/2021	**PATRICK MARQUIS AYTON JR**	ATM withdrawal of $1,000 from a prepaid debit account at Bank of America using a Bank of America Visa debit card ending in 3502 issued in the name of M.T.

COUNT	APPROX. DATE	DEFENDANT	EXECUTION
15	07/04/2021	**PATRICK MARQUIS AYTON JR**	ATM withdrawal of $1,000 from a prepaid debit account at Bank of America using a Bank of America Visa debit card ending in 2007 issued in the name of R.A.
16	07/9/2021	**PATRICK MARQUIS AYTON JR**	ATM withdrawal of $1,000 from a prepaid debit account at Bank of America using a Bank of America Visa debit card ending in 2007 issued in the name of R.A.
17	07/15/2021	**ROBERT MCKINLEY THOMAS**	ATM withdrawal of $1,000 from a prepaid debit account at Bank of America using a Bank of America Visa debit card ending in 3502 issued in the name of M.T.
18	07/29/2021	**PHILLIP MICHAEL VALCIN JR**	ATM withdrawal of $1,000 from a prepaid debit account at Bank of America using a Bank of America Visa debit card ending in 5530 issued in the name of A.S.
19	08/19/2021	**JUSTIN ANTHONY SEIVRIGHT**	ATM withdrawal of $1,000 from a prepaid debit account at Bank of America using a Bank of America Visa debit card ending in 0321 issued in the name of K.M.
20	08/19/2021	**JUSTIN ANTHONY SEIVRIGHT**	ATM withdrawal of $1,000 from a prepaid debit account at Bank of America using a Bank of America Visa debit card ending in 4028 issued in the name of T.H.
21	08/25/2021	**LINDSLEY CHAMBERS JR**	ATM withdrawal of $1,000 from a prepaid debit account at Bank of America using a Bank of America Visa debit card ending in 9454 issued in the name of R.S.

COUNT	APPROX. DATE	DEFENDANT	EXECUTION
22	09/06/2021	**JUSTIN ANTHONY SEIVRIGHT**	ATM withdrawal of $1,000 from a prepaid debit account at Bank of America using a Bank of America Visa debit card ending in 4187 issued in the name of B.Z.

In violation of Title 18, United States Code, Section 1343(2).

<u>COUNTS 23-43</u>
Aggravated Identity Theft
(18 U.S.C. § 1028A(a)(1))

32. On or about the dates specified in each count below, in Broward County, in the Southern District of Florida, and elsewhere, the defendants,

LINDSLEY CHAMBERS JR,
ROBERT MCKINLEY THOMAS,
JUSTIN ANTHONY SEIVRIGHT,
TACAVEON TRAVON CARSON,
PHILLIP MICHAEL VALCIN JR,
BRANDON JEROME SNIDER, and
PATRICK MARQUIS AYTON JR,

as specified in each count below, during and in relation to a felony violation of Title 18, United States Code, Section 1344, that is, bank fraud as charged in this indictment, did knowingly transfer, possess, and use, without lawful authority, the means of identification of another person, that is:

COUNT	APPROX. DATE	DEFENDANT	MEANS OF IDENTIFICATION
23	01/17/2021	**BRANDON JEROME SNIDER**	Bank of America Visa debit card ending in 0540 issued in the name of S.E.
24	01/19/2021	**ROBERT MCKINLEY THOMAS**	Bank of America Visa debit card ending in 8562 issued in the name of N.R.

COUNT	APPROX. DATE	DEFENDANT	MEANS OF IDENTIFICATION
25	01/23/2021	**BRANDON JEROME SNIDER**	Bank of America Visa debit card ending in 0540 issued in the name of S.E.
26	01/27/2021	**BRANDON JEROME SNIDER**	Bank of America Visa debit card ending in 0540 issued in the name of S.E.
27	01/30/2021	**ROBERT MCKINLEY THOMAS**	Bank of America Visa debit card ending in 5157 issued in the name of R.H.
28	01/31/2021	**TACAVEON TRAVON CARSON**	Bank of America Visa debit card ending in 5157 issued in the name of R.H.
29	05/18/2021	**TACAVEON TRAVON CARSON**	Bank of America Visa debit card ending in 1318 issued in the name of J.M.
30	05/18/2021	**PHILLIP MICHAEL VALCIN JR**	Bank of America Visa debit card ending in 2734 issued in the name of J.E.
31	06/02/2021	**TACAVEON TRAVON CARSON**	Bank of America Visa debit card ending in 0660 issued in the name of M.S.
32	06/10/2021	**LINDSLEY CHAMBERS JR**	Bank of America Visa debit card ending in 7242 issued in the name of E.B.
33	06/18/2021	**LINDSLEY CHAMBERS JR**	Bank of America Visa debit card ending in 7242 issued in the name of E.B.
34	06/27/2021	**PHILLIP MICHAEL VALCIN JR**	Bank of America Visa debit card ending in 5217 issued in the name of G.F.
35	06/29/2021	**PATRICK MARQUIS AYTON JR**	Bank of America Visa debit card ending in 3502 issued in the name of M.T.

COUNT	APPROX. DATE	DEFENDANT	MEANS OF IDENTIFICATION
36	07/04/2021	**PATRICK MARQUIS AYTON JR**	Bank of America Visa debit card ending in 2007 issued in the name of R.A.
37	07/9/2021	**PATRICK MARQUIS AYTON JR**	Bank of America Visa debit card ending in 2007 issued in the name of R.A.
38	07/15/2021	**ROBERT MCKINLEY THOMAS**	Bank of America Visa debit card ending in 3502 issued in the name of M.T.
39	07/29/2021	**PHILLIP MICHAEL VALCIN JR**	Bank of America Visa debit card ending in 5530 issued in the name of A.S.
40	08/19/2021	**JUSTIN ANTHONY SEIVRIGHT**	Bank of America Visa debit card ending in 0321 issued in the name of K.M.
41	08/19/2021	**JUSTIN ANTHONY SEIVRIGHT**	Bank of America Visa debit card ending in 4028 issued in the name of T.H.
42	08/25/2021	**LINDSLEY CHAMBERS JR**	Bank of America Visa debit card ending in 9454 issued in the name of R.S.
43	09/06/2021	**JUSTIN ANTHONY SEIVRIGHT**	Bank of America Visa debit card ending in 4187 issued in the name of B.Z.

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

FORFEITURE
18 U.S.C. § 982(a)(2))

1. The allegations of this Indictment are re-alleged and by this reference fully incorporated herein for the purpose of alleging forfeiture to the United States of certain property in which one or more of the defendants, **LINDSLEY CHAMBERS JR, ROBERT MCKINLEY THOMAS, JUSTIN ANTHONY SEIVRIGHT, TACAVEON TRAVON CARSON, PHILLIP MICHAEL VALCIN JR, BRANDON JEROME SNIDER,** and **PATRICK MARQUIS AYTON JR,** have an interest.

2. Upon conviction of a violation of, or a conspiracy to violate, Title 18, United States Code, Section 1343; and/or Title 18, United States Code, Section 1344, as alleged in this Indictment, the defendant so convicted shall forfeit to the United States of America any property constituting, or derived from, proceeds obtained directly or indirectly, as the result of such violation, pursuant to Title 18, United States Code, Section 982(a)(2)(B).

All pursuant to Title 18, United States Code, Section 982(a)(2)(B), and the procedures set forth at Title 21, United States Code, Section 853, made applicable by Title 18, United States Code, Section 982(b).

A TRUE BILL

FOREPERSON

BRUCE O. BROWN

FOR JASON A. REDING QUIÑONES
UNITED STATES ATTORNEY

DAVID A. SNIDER
ASSISTANT UNITED STATES ATTORNEY

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

UNITED STATES OF AMERICA **CASE NO.:** 25-cr-60273-Huck/Valle

v.

LINDSLEY CHAMBERS JR et al.,

_______________________________________/

Defendants.

CERTIFICATE OF TRIAL ATTORNEY

Court Division (select one)
☐ Miami ☐ Key West ☐ FTP
☑ FTL ☐ WPB

Superseding Case Information:
New Defendant(s) (Yes or No) _____
Number of New Defendants _____
Total number of new counts _____

I do hereby certify that:

1. I have carefully considered the allegations of the Indictment, the number of defendants, the number of probable witnesses and the legal complexities of the Indictment/Information attached hereto.
2. I am aware that the information supplied on this statement will be relied upon by the Judges of this Court in setting their calendars and scheduling criminal trials under the mandate of the Speedy Trial Act, 28 U.S.C. §3161.
3. Interpreter: (Yes or No) No
   List language and/or dialect: _______________
4. This case will take 7 days for the parties to try.
5. Please check appropriate category and type of offense listed below:

(Check only one)			(Check only one)
I	☐	0 to 5 days	☐ Petty
II	☑	6 to 10 days	☐ Minor
III	☐	11 to 20 days	☐ Misdemeanor
IV	☐	21 to 60 days	☑ Felony
V	☐	61 days and over	

6. Has this case been previously filed in this District Court? (Yes or No) No
   If yes, Judge _______________ Case No. _______________
7. Has a complaint been filed in this matter? (Yes or No) No
   If yes, Judge _______________ Magistrate Case No. _______________
8. Does this case relate to a previously filed matter in this District Court? (Yes or No) No
   If yes, Judge _______________ Case No. _______________
9. Defendant(s) in federal custody as of _______________
10. Defendant(s) in state custody as of _______________
11. Rule 20 from the __________ District of _______________
12. Is this a potential death penalty case? (Yes or No) No
13. Does this case originate from a matter pending in the Central Region of the U.S. Attorney's Office prior to October 3, 2019 (Mag. Judge Jared M. Strauss)? (Yes or No) No
14. Did this matter involve the participation of or consultation with Magistrate Judge Eduardo I. Sanchez during his tenure at the U.S. Attorney's Office, which concluded on January 22, 2023? No
15. Did this matter involve the participation of or consultation with Magistrate Judge Marty Fulgueira Elfenbein during her tenure at the U.S. Attorney's Office, which concluded on March 5, 2024? No
16. Did this matter involve the participation of or consultation with Magistrate Judge Ellen F. D'Angelo during her tenure at the U.S. Attorney's Office, which concluded on October 7, 2024? No

By: _______________________
DAVID A. SNIDER
Assistant United States Attorney
SDFL Court ID No. A5502260

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: LINDSLEY CHAMBERS JR

Count #: 1

Conspiracy to Commit Bank Fraud and Wire Fraud

Title 18, United States Code, Section 1349

* **Max. Term of Imprisonment:** 30 Years
* **Min. Term of Imprisonment (if applicable):** N/A
* **Max. Supervised Release:** 5 Years
* **Max. Fine:** $1,000,000

Counts #: 11, 12, 21

Bank Fraud

Title 18, United States Code, Section 1344

* **Max. Term of Imprisonment:** 30 Years
* **Min. Term of Imprisonment (if applicable):** N/A
* **Max. Supervised Release:** 5 Years
* **Max. Fine:** $1,000,000

Counts #: 32, 33, 42

Aggravated Identity Theft

Title 18, United States Code, Section 1028A(a)(1)

* **Max. Term of Imprisonment:** 2 Years Consecutive to Any Other Sentence Imposed
* **Min. Term of Imprisonment:** 2 Years Consecutive to Any Other Sentence Imposed
* **Max. Supervised Release:** 1 Year
* **Max. Fine:** $250,000

***Refers only to possible term of incarceration, supervised release and fines. It does not include restitution, special assessments, parole terms, or forfeitures that may be applicable.**

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: ROBERT MCKINLEY THOMAS

Count #: 1

Conspiracy to Commit Bank Fraud and Wire Fraud

Title 18, United States Code, Section 1349

* **Max. Term of Imprisonment:** 30 Years
* **Min. Term of Imprisonment (if applicable)**: N/A
* **Max. Supervised Release:** 5 Years
* **Max. Fine:** $1,000,000

Counts #: 3, 6, 17

Bank Fraud

Title 18, United States Code, Section 1344

* **Max. Term of Imprisonment:** 30 Years
* **Min. Term of Imprisonment (if applicable)**: N/A
* **Max. Supervised Release:** 5 Years
* **Max. Fine:** $1,000,000

Counts #: 24, 27, 38

Aggravated Identity Theft

Title 18, United States Code, Section 1028A(a)(1)

* **Max. Term of Imprisonment:** 2 Years Consecutive to Any Other Sentence Imposed
* **Min. Term of Imprisonment:** 2 Years Consecutive to Any Other Sentence Imposed
* **Max. Supervised Release:** 1 Year
* **Max. Fine:** $250,000

***Refers only to possible term of incarceration, supervised release and fines. It does not include restitution, special assessments, parole terms, or forfeitures that may be applicable.**

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: JUSTIN ANTHONY SEIVRIGHT

Count #: 1

Conspiracy to Commit Bank Fraud and Wire Fraud

Title 18, United States Code, Section 1349

* **Max. Term of Imprisonment:** 30 Years
* **Min. Term of Imprisonment (if applicable)**: N/A
* **Max. Supervised Release:** 5 Years
* **Max. Fine:** $1,000,000

Counts #: 19, 20, 22

Bank Fraud

Title 18, United States Code, Section 1344

* **Max. Term of Imprisonment:** 30 Years
* **Min. Term of Imprisonment (if applicable)**: N/A
* **Max. Supervised Release:** 5 Years
* **Max. Fine:** $1,000,000

Counts #: 40, 41, 43

Aggravated Identity Theft

Title 18, United States Code, Section 1028A(a)(1)

* **Max. Term of Imprisonment:** 2 Years Consecutive to Any Other Sentence Imposed
* **Min. Term of Imprisonment:** 2 Years Consecutive to Any Other Sentence Imposed
* **Max. Supervised Release:** 1 Year
* **Max. Fine:** $250,000

***Refers only to possible term of incarceration, supervised release and fines. It does not include restitution, special assessments, parole terms, or forfeitures that may be applicable.**

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: TACAVEON TRAVON CARSON

Count #: 1

Conspiracy to Commit Bank Fraud and Wire Fraud

Title 18, United States Code, Section 1349

* **Max. Term of Imprisonment:** 30 Years
* **Min. Term of Imprisonment (if applicable):** N/A
* **Max. Supervised Release:** 5 Years
* **Max. Fine:** $1,000,000

Counts #: 7, 8, 10

Bank Fraud

Title 18, United States Code, Section 1344

* **Max. Term of Imprisonment:** 30 Years
* **Min. Term of Imprisonment (if applicable):** N/A
* **Max. Supervised Release:** 5 Years
* **Max. Fine:** $1,000,000

Counts #: 28, 29, 31

Aggravated Identity Theft

Title 18, United States Code, Section 1028A(a)(1)

* **Max. Term of Imprisonment:** 2 Years Consecutive to Any Other Sentence Imposed
* **Min. Term of Imprisonment:** 2 Years Consecutive to Any Other Sentence Imposed
* **Max. Supervised Release:** 1 Year
* **Max. Fine:** $250,000

***Refers only to possible term of incarceration, supervised release and fines. It does not include restitution, special assessments, parole terms, or forfeitures that may be applicable.**

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: PHILLIP MICHAEL VALCIN JR

Count #: 1

Conspiracy to Commit Bank Fraud and Wire Fraud

Title 18, United States Code, Section 1349

* **Max. Term of Imprisonment:** 30 Years
* **Min. Term of Imprisonment (if applicable)**: N/A
* **Max. Supervised Release:** 5 Years
* **Max. Fine:** $1,000,000

Counts #: 9, 13, 18

Bank Fraud

Title 18, United States Code, Section 1344

* **Max. Term of Imprisonment:** 30 Years
* **Min. Term of Imprisonment (if applicable)**: N/A
* **Max. Supervised Release:** 5 Years
* **Max. Fine:** $1,000,000

Counts #: 30, 34, 39

Aggravated Identity Theft

Title 18, United States Code, Section 1028A(a)(1)

* **Max. Term of Imprisonment:** 2 Years Consecutive to Any Other Sentence Imposed
* **Min. Term of Imprisonment:** 2 Years Consecutive to Any Other Sentence Imposed
* **Max. Supervised Release:** 1 Year
* **Max. Fine:** $250,000

***Refers only to possible term of incarceration, supervised release and fines. It does not include restitution, special assessments, parole terms, or forfeitures that may be applicable.**

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: BRANDON JEROME SNIDER

Count #: 1

Conspiracy to Commit Bank Fraud and Wire Fraud

Title 18, United States Code, Section 1349

* **Max. Term of Imprisonment:** 30 Years
* **Min. Term of Imprisonment (if applicable)**: N/A
* **Max. Supervised Release:** 5 Years
* **Max. Fine:** $1,000,000

Counts #: 2, 4, 5

Bank Fraud

Title 18, United States Code, Section 1344

* **Max. Term of Imprisonment:** 30 Years
* **Min. Term of Imprisonment (if applicable)**: N/A
* **Max. Supervised Release:** 5 Years
* **Max. Fine:** $1,000,000

Counts #: 23, 25, 26

Aggravated Identity Theft

Title 18, United States Code, Section 1028A(a)(1)

* **Max. Term of Imprisonment:** 2 Years Consecutive to Any Other Sentence Imposed
* **Min. Term of Imprisonment:** 2 Years Consecutive to Any Other Sentence Imposed
* **Max. Supervised Release:** 1 Year
* **Max. Fine:** $250,000

***Refers only to possible term of incarceration, supervised release and fines. It does not include restitution, special assessments, parole terms, or forfeitures that may be applicable.**

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: PATRICK MARQUIS AYTON JR

Count #: 1

Conspiracy to Commit Bank Fraud and Wire Fraud

Title 18, United States Code, Section 1349

* **Max. Term of Imprisonment:** 30 Years
* **Min. Term of Imprisonment (if applicable)**: N/A
* **Max. Supervised Release:** 5 Years
* **Max. Fine:** $1,000,000

Counts #: 14, 15, 16

Bank Fraud

Title 18, United States Code, Section 1344

* **Max. Term of Imprisonment:** 30 Years
* **Min. Term of Imprisonment (if applicable)**: N/A
* **Max. Supervised Release:** 5 Years
* **Max. Fine:** $1,000,000

Counts #: 35, 36, 37

Aggravated Identity Theft

Title 18, United States Code, Section 1028A(a)(1)

* **Max. Term of Imprisonment:** 2 Years Consecutive to Any Other Sentence Imposed
* **Min. Term of Imprisonment:** 2 Years Consecutive to Any Other Sentence Imposed
* **Max. Supervised Release:** 1 Year
* **Max. Fine:** $250,000

***Refers only to possible term of incarceration, supervised release and fines. It does not include restitution, special assessments, parole terms, or forfeitures that may be applicable.**