

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF FLORIDA  
JACKSONVILLE DIVISION

FILED IN OPEN COURT  
8.18.05  
CLERK, U.S. DISTRICT COURT  
MIDDLE DISTRICT OF FLORIDA  
JACKSONVILLE, FLORIDA

UNITED STATES OF AMERICA

v.

CASE NO. 3:05-cr-  
Ct. 1: 18 U.S.C. §1029(b)  
Forfeiture: 18 U.S.C. §982

276-g-20 HTS  
3  
[Signature]

KILALBLO WILSON  
a/k/a "Bean"  
a/k/a "Sam"  
JEREL WILKERSON  
a/k/a "Dee"  
LANGSTON WILLIAMS  
a/k/a "Red"

INDICTMENT

The Grand Jury charges:

COUNT ONE

Between in or about February 2004 and continuing to in or about January 2005, at Jacksonville, in the Middle District of Florida, and elsewhere,

KILALBLO WILSON,  
a/k/a "Bean"  
a/k/a "Sam"  
JEREL WILKERSON  
a/k/a "Dee"  
LANGSTON WILLIAMS  
a/k/a "Red"

defendants herein, did knowingly, willfully, and intentionally combined, conspired, confederated and agreed together with others known and unknown to the grand jury, to knowingly and with intent to defraud traffic in and use, and cause the use of one or more unauthorized access devices during a one-year period, and by such conduct, obtained and caused to be obtained items of value, the aggregate of which exceeded \$1,000 during that period, and did thereby affect interstate commerce, in violation of Title 18, United States Code, Section 1029(a)(2).

**Overt Acts**

In furtherance of the conspiracy and to effect the objects thereof, the following overt acts, among others, were committed:

1) In or about February, 2004, at Jacksonville, Florida, Langston Williams, a Citibank employee, obtained customer information pertaining to numerous Citibank accounts, and provided that information to KILALBLO WILSON in return for payment.

2) In or about early December, 2004, at Jacksonville, JEREL WILKERSON and KILALBLO WILSON had a conversation in which WILKERSON agreed to provide WILSON with credit card information and related data which WILKERSON obtained through his (WILKERSON'S) employment at Citibank.

3) On or about December 11, 2004, at Jacksonville, Florida, KILALBLO WILSON used Citibank credit information of a genuine Citibank customer, which WILSON had obtained by fraud, in order to obtain cellular telephones.

4) On or about January 10, 2005, at Jacksonville, Florida, KILALBLO WILSON provided credit card information to another individual, who in turn used the credit information to purchase sound equipment from The Music Depot.

All in violation of Title 18, United States Code, Section 1029(b)(7)

*2*  
*gsm*

**FORFEITURES**

1. The allegations contained in Count One of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to the provisions of Title 18, United States Code, Section 982.

2. From their engagement in the violations alleged in Count One of this Indictment, the defendants

KILALBLO WILSON,  
a/k/a "Bean"  
a/k/a "Sam"  
JEREL WILKERSON  
a/k/a "Dee"  
LANGSTON WILLIAMS  
a/k/a "Red"

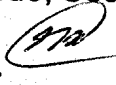
shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 982, any and all right, title, and interest they may have in any property constituting, or derived from, proceeds the person obtained directly or indirectly, as a result of such violations of 18 U.S.C. §1029(a)(2), including but not limited to the following:

- (a) \$1,100.00 in United States currency, seized from Langston Williams, a/k/a "Red," on January 31, 2005 by United States Secret Service.

3. If any of the property described above, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or


- e. has been commingled with other property which cannot be divided without difficulty,


the United States of America shall be entitled to forfeiture of substitute property under the provisions of Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(<sup>2</sup>~~7~~). 

A TRUE BILL,

  
Foreperson

PAUL I. PEREZ  
United States Attorney

By:   
KATHLEEN O'MALLEY  
Assistant United States Attorney  
Senior Litigation Counsel

By:   
BRIAN M. KANE  
Assistant United States Attorney  
Chief, Jacksonville Division

**UNITED STATES DISTRICT COURT**

Middle District of Florida  
Jacksonville Division

THE UNITED STATES OF AMERICA

vs.

KILALBLO WILSON,  
a/k/a "Bean",  
a/k/a "Sam",  
JEREL WILKERSON,  
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LANGSTON WILLIAMS,  
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**INDICTMENT**

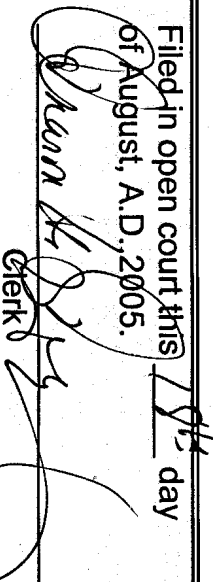
Violations:

Title 18, United States Code, Section 1029(b)(1)

A true bill,

  
Foreperson

Filed in open court this 15<sup>th</sup> day  
of August, A.D. 2005.

  
Clerk

Bail \$ \_\_\_\_\_