

**IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF MISSOURI  
SOUTHWESTERN DIVISION**

<b>UNITED STATES OF AMERICA,</b>	)	
	)	<b>NO. 07-05058-01-CR-SW-FJG</b>
Plaintiff,	)	
	)	
v.	)	<b>COUNT ONE:</b>
	)	18 U.S.C. §§1028(a)(3), & (b)(2)
<b>DAVID LORENZO FLETCHER,</b>	)	NMT 5 years &/or \$250,000 fine
[DOB: xx-xx-66]	)	NMT 3 years supervised release
	)	
	)	<b>COUNT TWO:</b>
	)	18 U.S.C. §§ 1028(a)(5), & (b)(1)
	)	NMT 15 years &/or \$250,000 fine
	)	NMT 3 years supervised release
	)	
	)	<b>COUNT THREE:</b>
	)	18 U.S.C. §§ 1028(a)(7), & (b)(2)
	)	NMT 5 years &/or \$250,000 fine
	)	NMT 3 years supervised release
	)	
	)	<b>COUNT FOUR:</b>
	)	18 U.S.C. § 513(a)
	)	NMT 10 years &/or \$250,000 fine
	)	NMT 3 years supervised release
	)	
	)	<b>FORFEITURE ALLEGATION</b>
	)	18 U.S.C. §§ 492 & 1028(b)(5),
	)	& 1028(g); 21 U.S.C. § 853
	)	
Defendant.	)	\$100 Assessment Per Count

**INDICTMENT**

THE GRAND JURY CHARGES THAT:

**COUNT ONE**

On or about April 19, 2007, in Jasper County, in the Western District of Missouri,

DAVID LORENZO FLETCHER, defendant, did knowingly possess in and affecting interstate commerce, with intent to use and transfer unlawfully five or more false identification documents, to wit, 55 counterfeit Missouri driver's licenses, in violation of Title 18, United States Code, Sections 1028(a)(3) and (b)(2).

### **COUNT TWO**

On or about April 19, 2007, in Jasper County, in the Western District of Missouri, DAVID LORENZO FLETCHER, defendant, did knowingly possess in and affecting interstate commerce a document-making implement, to wit,

1. Hewlett Packard Pavilion laptop computer, Serial CN5241RJR;
2. Hewlett Packard printer, Serial CN43IG20BV;
3. Hewlett Packard Laserjet printer, Serial CNBK927396;
4. Kingston thumb drive; and,
5. Opera identification card printer, Serial 433938

with the intent that such document- making implement be used in the production of a false identification document, in violation of Title 18, United States Code, Sections 1028(a)(5) and (b)(1).

### **COUNT THREE**

On or about April 19, 2007, in Jasper County, in the Western District of Missouri, DAVID LORENZO FLETCHER, defendant, did knowingly possess in and affecting interstate commerce, a means of identification of another persons, to wit, a collection of employment applications from different individuals and other human resource

information, with the intent to use said means of identification to create false identification documents contrary to the provisions of Title 18, United States Code, Section 1028(a)(3) all in violation of Title 18, United States Code, Sections 1028(a)(7) and (b)(2).

#### **COUNT FOUR**

On or about April 19, 2007, in Jasper County, in the Western District of Missouri, DAVID LORENZO FLETCHER, defendant, did knowingly possess a counterfeited security of an organization, with the intent to deceive another person and organization, to wit: three payroll checks purporting to be from Racetrac Petroleum, Inc. in the amount of \$725.30, \$527.10, and \$475.75 each, in violation of Title 18, United States Code, Section 513(a).

#### **FORFEITURE ALLEGATION**

The allegations contained in Counts One through Four above are realleged and are incorporated by reference herein for the purpose of alleging forfeiture of: any counterfeit or forged identification documents, means of identification, and counterfeit securities of an organization, described in Title 18, United States Code, Sections 513(a) and 1028(a)(3), (5), & (7); any property, real or personal, used or intended to be used to commit or to promote the commission of such offense; including, but not limited to the following:

1. Hewlett Packard Pavilion laptop computer, Serial CN5241RJR;
2. Hewlett Packard printer, Serial CN43IG20BV;

3. Hewlett Packard Laserjet printer, Serial CNBK927396;
4. Kingston thumb drive; and,
5. Opera identification card printer, Serial 433938

all in violation of Title 18, United States Code, Sections 1028(b)(5), 1028(g), and Title 21, United States Code, Section 853.

**A TRUE BILL.**

/s/ \_\_\_\_\_  
FOREPERSON OF THE GRAND JURY

/s/ **Rose A. Barber** \_\_\_\_\_  
Rose A. Barber  
Assistant United States Attorney