

INDICTMENT  
SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF QUEENS

THE PEOPLE OF THE STATE OF NEW YORK

-against-

1. MARCUS WILCHER,
2. STACIE SAUNDERS,
3. ANYEKACHE HERCULES,
4. JERRY CURRIN,
5. DEAN LLOYD,

Defendants.

Filed:

INDICTMENT NO. 1538/2022

STATE OF NEW YORK OFFICE OF  
THE ATTORNEY GENERAL

PUBLIC INTEGRITY BUREAU

COUNTS

P. L. § 105.10(1)	CONSPIRACY IN THE FOURTH DEGREE	Marcus Wilcher (1,2) Stacie Saunders (1,2) Anyekache Hercules (1,2) Jerry Currin (1,2) Dean Lloyd (1,2)
P. L. § 470.15(3)(b)(i)(B)(ii)	MONEY LAUNDERING IN IN THE SECOND DEGREE	Marcus Wilcher (8,13,24) Stacie Saunders (8,13,24) Anyekache Hercules (8,13) Jerry Currin (8) Dean Lloyd (13)
P.L. § 470.15(2)(b)(ii)(A)(iii)	MONEY LAUNDERING IN THE SECOND DEGREE	Marcus Wilcher (14,25) Stacie Saunders (14,25) Anyekache Hercules (14) Dean Lloyd (14)
P. L. § 155.40(1)	GRAND LARCENY IN THE SECOND DEGREE	Marcus Wilcher (7,12,23) Stacie Saunders (7,12,23) Anyekache Hercules (7,12)

		Jerry Currin (7,12) Dean Lloyd (12)
P. L. § 110/155.40(1)	ATTEMPTED GRAND LARCENY IN THE SECOND DEGREE	Marcus Wilcher (4,5) Stacie Saunders (4,5) Anyekache Hercules (4,5) Jerry Currin (4)
P.L. § 170.10(1)	FORGERY IN THE SECOND DEGREE	Marcus Wilcher (9,17) Stacie Saunders (9,17) Anyekache Hercules (9,17) Jerry Currin (9,17) Dean Lloyd (17)
P. L. § 170.25	CRIMINAL POSSESSION OF A FORGED INSTRUMENT IN THE SECOND DEGREE	Dean Lloyd (20) Marcus Wilcher (10,27,28)
P. L. § 190.65	SCHEME TO DEFRAUD IN THE FIRST DEGREE	Marcus Wilcher (30) Stacie Saunders (30) Anyekache Hercules (30) Jerry Currin (30)
P.L. § 190.25(1)	CRIMINAL IMPERSONATION IN THE SECOND DEGREE	Anyekache Hercules (6,21) Dean Lloyd (22) Marcus Wilcher (29)
P. L. § 175.35	OFFERING A FALSE INSTRUMENT FOR FILING IN THE FIRST DEGREE	Marcus Wilcher (11,18,26) Stacie Saunders (11,18,26) Anyekache Hercules (11,18) Jerry Currin (11,18,19) Dean Lloyd (18)
NYS JUDICIARY § 486, 485-A	PRACTICE OF LAW BY AN ATTORNEY WHO HAS BEEN DISBARRED, SUSPENDED OR CONVICTED OF A FELONY	Anyekache Hercules (3,15,16)

A TRUE BILL

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GRAND JURY FOREPERSON

LETITIA JAMES  
ATTORNEY GENERAL  
STATE OF NEW YORK

## INTRODUCTION TO ALL COUNTS

On or about and in between September 16, 2019 and October 26, 2020, in the County of Queens, State of New York, and elsewhere in the State of New York, State of Georgia, and State of Pennsylvania, the defendants MARCUS WILCHER, STACIE SAUNDERS, ANYEKACHE HERCULES, JERRY CURRIN, DEAN LLOYD, and others both known and unknown, engaged in conspiracies to steal real property from their legitimate owners by fraudulently transferring deed titles, and to launder the proceeds of such fraudulent deed transfers. It was the goal of the conspiracy to:

- a. Generate money for members of the conspiracy through fraudulent sales of real property;
- b. Gather the personal identifying information of homeowners and their family members to facilitate the fraudulent sales of real property;
- c. Use temporary cellular phone numbers, and email addresses falsely attributed to the legitimate homeowners, to conceal their identities and impersonate the homeowners;
- d. Create forged and falsified documents to enable the closing of sales of the subject real properties;
- e. Conceal the true identities of ultimate recipients of proceeds of the fraudulent sales of real property, by transferring the proceeds through a series of bank accounts connected to limited liability companies (“LLCs”) and other companies;
- f. Took steps to conceal their true identity.

At all times relevant to the conspiracy, the conspirators intended to obtain proceeds from the sale of real property that they did not have a legal right to sell. To facilitate the conspiracy, its members identified distressed properties and the owners of those properties. The members of the conspiracy then created fraudulent driver’s licenses and other identifying documents and market the properties for sale at a price below market value. The conspiracy utilized imposters pretending to be the legitimate homeowners

who appeared at the title closings and directed the sale proceeds to be wired to bank accounts of entities that were owned or controlled by the conspirators.

i. The Defendants

Each charged defendant participated in and aided the other defendants, and others in the commission of the crimes and overt acts charged in the conspiracy. The commission of the crimes was planned with each participating defendant assuming specific roles in furtherance of the commission of the charged crimes.

MARCUS WILCHER identified properties to target, researched the personal identifying information of the rightful homeowners, and created or caused to be created counterfeit driver's licenses and social security cards for the imposter-homeowners to present at title closings. STACIE SAUNDERS used her knowledge and resources as a real estate sales person and mortgage banker to list the properties to potential buyers, recruit attorneys for the imposter-homeowners, and prospective buyers, and act as a go-between for the imposter-homeowners and other necessary participants to the real estate closings. ANYEKACHE HERCULES, a disbarred attorney, drafted contracts and other legal documents necessary for the closings and would sometimes appear at closings as the imposter-homeowner's attorney. HERCULES also used the names of other, non-disbarred attorneys on emails to potential buyers to disguise her true identity and thus continue to hold herself out act as a lawyer, or other authorized representative of parties to the subject real estate transactions. JERRY CURRIN met with potential buyers for at least one property that was fraudulently sold, and appeared at the closing with an imposter-homeowner that he falsely claimed was his sister. CURRIN also filed an heirship affidavit in which he falsely stated that an heir to the estate that had legitimate title to a subject property was the sole heir to that estate, enabling the fraudulent sale of that property to occur. DEAN LLOYD impersonated an heir with a lawful partial interest in a subject property, and attended a real estate closing as the imposter heir

to achieve the fraudulent sale of that property. LLOYD presented a forged driver's license bearing his own photograph, but the identifying information of the legitimate heir to the subject property.

At all times relevant to this conspiracy, the defendants controlled various LLCs and other entities and used those entities to funnel funds derived from fraudulent real estate sales to themselves. MARCUS WILCHER controlled several LLCs in Georgia, including SELOVER CONSULTING GROUP LLC and 4ME LOGISTICS LLC. STACIE SAUNDERS controlled ERUDITE CONSULTING LLC, based in New York. ANYEKACHE HERCULES controlled THE HERCULES FIRM, INC, based in New York. DEAN LLOYD controlled FOUNDATION FOR RELIGIOUS TRUTH INC, based in Pennsylvania. The conspirators also used numerous bank accounts and had access to and control over LLCs established in the names of unindicted members of the conspiracy, including SG 347 HOLDINGS LLC and DS4 HOLDINGS LLC, both of which were based in Georgia. The named entities were used to conceal the defendants' receipt of funds generated from their crimes.

#### COUNT ONE

THE GRAND JURY OF THE COUNTY OF QUEENS, by this Indictment, accuses the defendants, MARCUS WILCHER, STACIE SAUNDERS, ANYEKACHE HERCULES, JERRY CURRIN, and DEAN LLOYD of the crime of CONSPIRACY IN THE FOURTH DEGREE in violation of §105.10(1) of the Penal Law of the State of New York, committed as follows:

On or about and in between September 16, 2019 and October 26, 2020, both dates being approximate and inclusive, within Queens County, in the State of New York, and elsewhere, with intent that conduct constituting the crime of Grand Larceny in the Second Degree, [Penal Law § 155.40(1)] a Class C Felony, be committed, the defendants knowingly and intentionally agreed with each other and

with others, known and unknown, to engage in and cause the performance of such conduct as would constitute this Class C felony.

### COUNT TWO

AND THE AFORESAID GRAND JURY, by this Indictment, accuses the defendants, MARCUS WILCHER, STACIE SAUNDERS, ANYEKACHE HERCULES, JERRY CURRIN, and DEAN LLOYD of the crime of CONSPIRACY IN THE FOURTH DEGREE in violation of §105.10(1) of the Penal Law of the State of New York, committed as follows:

On or about and in between September 16, 2019 and October 26, 2020, both dates being approximate and inclusive, within Queens County, in the State of New York, and elsewhere, with intent that conduct constituting the crime of Money Laundering in the Second Degree, [Penal Law § 470.15(3)(b)(i)(B)(ii)] a Class C Felony, be committed, the defendants knowingly and intentionally agreed with each other and with others, known and unknown, to engage in and cause the performance of such conduct as would constitute this Class C felony.

### OVERT ACTS

In the furtherance of the conspiracies set forth in Count One and Count Two, and to affect the objects thereof, on or about and in between approximately September 16, 2019, and October 26, 2020, the following overt acts, among others, were committed. Some of the following overt acts occurred within the County of Queens, in the State of New York:

Theft of 161-14 121 Avenue, Queens, New York (“CURRIN PROPERTY”), Attempted Theft of 138-15 107 Avenue, Queens, New York (“MEYERS PROPERTY”) and Distribution of Funds

1. On or about September 16, 2019, STACIE SAUNDERS emailed a term-sheet to a potential buyer “CO,” a person known to the Grand Jury, that listed ANYEKACHE HERCULES as the attorney for seller and herself as the broker for 161-14 121 Avenue, Queens, New York.

2. On or about September 24, 2019, MARCUS WILCHER emailed an unidentified co-conspirator copies of the real Karen Davis's signature for the purpose of creating a counterfeit driver's license. The late Karen Davis was the administrator of the Martha Currin Estate. The Martha Currin Estate was the lawful owner of the CURRIN PROPERTY.
3. On or about September 24, 2019, ANYEKACHE HERCULES emailed a copy of a probate form pre-filled with the name and address of "MC," a person known to the Grand Jury to STACIE SAUNDERS. MC was one of the lawful heirs of the Martha Currin Estate.
4. On or about September 25, 2019, STACIE SAUNDERS emailed ANYEKACHE HERCULES a completed copy of the aforementioned probate forms as well as photocopies of counterfeit driver's licenses of Martha Currin's heirs.
5. On or about September 27, 2019, MARCUS WILCHER emailed a copy of the announcement of ANYEKACHE HERCULES' disbarment to STACIE SAUNDERS.
6. On or about September 27, 2019, ANYEKACHE HERCULES deposited a \$1,000 down payment check from real estate investor "KPL," a person known to the Grand Jury, representing buyer Globalized Realty Group, for his purchase of the CURRIN PROPERTY.
7. On or about November 21, 2019, ANYEKACHE HERCULES sent an email to the law firm of "AP" LLC, an entity known to the Grand Jury, requesting a payoff letter from a lender for the CURRIN PROPERTY; ANYEKACHE HERCULES falsely represented herself to be attorney "JE," known to the Grand Jury, and falsely claimed that she represented the Estate of Martha Currin.
8. On or about November 22, 2019, STACIE SAUNDERS emailed a blank third-party authorization form to MARCUS WILCHER that requested the Queens County Surrogate Court furnish ANYEKACHE HERCULES with the Estate of Martha Currin's Letter of Administration.
9. On or about December 6, 2019, STACIE SAUNDERS sent a series of text messages to real estate investor "IB," a person known to the Grand Jury, to negotiate the sale of the CURRIN PROPERTY.
10. On or about December 9, 2019, STACIE SAUNDERS sent a text message to real estate investor IB regarding the sale of a second property, located at 138-15 107 Avenue, Queens, New York ("MEYERS PROPERTY").

11. On December 9, 2019, ANYEKACHE HERCULES emailed IB and requested a \$10,000 down payment for his purchase of the CURRIN PROPERTY from her email address theherculeslawfirm@gmail.com.
12. On or about December 9, 2019, ANYEKACHE HERCULES emailed a contract of sale the CURRIN PROPERTY to someone purporting to be Karen Davis, the administrator of the Martha Currin Estate, and copied an unidentified co-conspirator in that email.
13. On or about December 16, 2019, an unidentified co-conspirator, who claimed to be Karen Davis, arrived at the CURRIN PROPERTY to meet IB, show him the property, and discuss the sale of the same.
14. On or about December 16, 2019, IB, by text message, confronted STACIE SAUNDERS and stated that the purported sellers for the CURRIN PROPERTY and MEYERS PROPERTY were imposters. STACIE SAUNDERS apologized and then agreed to return the down-payments tendered by IB for the purchases of the CURRIN and MEYERS PROPERTIES.
15. On or about December 19, 2019, MARCUS WILCHER emailed STACIE SAUNDERS the Letters of Administration from the Surrogate Court and Employee Identification Number for the Estate of Martha Currin.
16. On or about January 6, 2020, ANYEKACHE HERCULES and JERRY CURRIN appeared at the closing with an imposter Karen Davis, an unidentified co-conspirator, and sold the CURRIN PROPERTY to buyer 121 Management LLC represented by "MA," a person known to the Grand Jury. The purchase contract had been assigned to 121 Management LLC by Globalized Realty Group for \$490,000 in United States currency.
17. On or about January 10, 2020, an unidentified co-conspirator impersonating Karen Davis opened a bank account for the Estate of Martha Currin at JP Morgan Chase Bank and received the proceeds of the sale of the CURRIN PROPERTY.
18. On or about January 13, 2020, JERRY CURRIN deposited a \$70,000 check from the Estate of Martha Currin into two separate personal Chase bank accounts, each account receiving \$35,000.
19. On or about January 13, 2020, MARCUS WILCHER received a wire transfer for \$95,000 from the Estate of Martha Currin JP Morgan Chase account to the bank account for his company SELOVER CONSULTING GROUP.



20. On or about January 14, 2020, STACIE SAUNDERS deposited a \$20,000 check of the CURRIN PROPERTY sale proceeds from SELOVER CONSULTING GROUP, into the bank account of her company ERUDITE CONSULTING.
21. On or about January 24, 2020, MARCUS WILCHER, through his company SELOVER CONSULTING GROUP, wired \$20,000 to the bank account of The HERCULES LAW FIRM Inc., controlled by ANYEKACHE HERCULES.

Theft of 112-39 176 Street, Queens, New York (“SMITH PROPERTY”)  
and Distribution of Funds

22. On or about January 29, 2020, MARCUS WILCHER created email address mikesmitty1954@gmail.com. That email was held out by the defendants to be the email of Michael Smith, an heir of the Estate of Lucy V. Smith. The Estate was the lawful owner of the SMITH PROPERTY. The real Michael Smith did not use or have any connection to that email.
23. On or about February 27, 2020, ANYEKACHE HERCULES emailed a contract of sale for the SMITH PROPERTY to mikesmitty1954@gmail.com.
24. On or about March 3, 2020, MARCUS WILCHER used his personal email address to email the completed fraudulent contract for the SMITH PROPERTY to ANYEKACHE HERCULES.
25. On or about March 24, 2020, ANYEKACHE HERCULES sent an email with the title report and death certificates for Herman Smith, husband of Lucy V. Smith (who had pre-deceased her), and Lucy V. Smith to a potential buyer. In that email, ANYEKACHE HERCULES impersonated attorney JE.
26. On or about May 6, 2020, JERRY CURRIN signed an heirship affidavit falsely attesting that he was a childhood friend of Michael Smith, son of Herman and Lucy Smith, and that Herman Smith and Lucy Smith had no other children or heirs beside Michael Smith. In fact, they had another son, Michael Smith’s brother, who had passed away prior to 2020, and who had children of his own.
27. On or about May 18, 2020, MARCUS WILCHER emailed STACIE SAUNDERS and ANYEKACHE HERCULES a counterfeit New York State Driver’s License and social security card in the name of Michael Smith.
28. On or about May 28, 2020, MARCUS WILCHER received a blank heirship affidavit with a notary stamp at markwil2011@ymail.com from the mikesmitty1954@gmail.com.

29. On or about May 31, 2020, ANYEKACHE HERCULES emailed MARCUS WILCHER a pre-filled probate form for Michael Smith.
30. On or about June 1, 2020, MARCUS WILCHER used the mikesmitty1954@gmail.com email account as subscriber contact information to establish an account with TextMe, Inc. and was assigned telephone number 570-473-5722.
31. STACIE SAUNDERS engaged an attorney "VG" known to the Grand Jury, to represent the imposter Michael Smith. On or about June 1, 2020, STACIE SAUNDERS emailed this attorney instructions to wire the proceeds of the sale of the SMITH PROPERTY to MARCUS WILCHER's controlled entities, SELOVER CONSULTING GROUP and SG347 HOLDINGS LLC.
32. On or about June 4, 2020, MARCUS WILCHER emailed STACIE SAUNDERS the personal identifying information, including social security number, of Herman Smith Sr., who was deceased.
33. On or about June 11, 2020, a person impersonating Michael Smith placed a telephone call to VG.
34. On or about June 23, 2020, DEAN LLOYD, impersonating Michael Smith, appeared at the VG's law offices and signed the contract of sale for the SMITH PROPERTY as the seller for the sale price of \$235,000 in United States currency.
35. On or about June 23, 2020, DEAN LLOYD presented a counterfeit driver's license that bore DEAN LLOYD's picture but contained the name and address of Michael Smith.
36. On or about June 24, 2020, attorney VG, following the instructions sent by STACIE SAUNDERS wired \$40,000 of the proceeds of the sale of the SMITH PROPERTY to SELOVER CONSULTING GROUP and \$151,124 to SG 347 HOLDINGS LLC.
37. On or about June 25, 2020, MARCUS WILCHER caused SG 347 HOLDINGS LLC to send two wire transfers to SELOVER CONSULTING GROUP, one for \$60,000 and another for \$56,000.
38. On or about June 29, 2020, STACIE SAUNDERS deposited a \$28,000 check from SELOVER CONSULTING GROUP into the bank account of her company ERUDITE CONSULTING.
39. On or about June 29, 2020, \$9,400 DEAN LLOYD deposited a check from SELOVER CONSULTING GROUP into the bank account of the FOUNDATION FOR RELIGIOUS TRUTH, which he controlled.

40. On or about July 1, 2020, DEAN LLOYD withdrew \$2,000 of the proceeds from the SMITH PROPERTY sale from the bank account to of FOUNDATION FOR RELIGIOUS TRUTH.

Theft of 168-11 119 Avenue, Queens, New York (“STEVENS PROPERTY”)  
and Distribution of Funds

41. On or about September 20, 2020, MARCUS WILCHER emailed himself photographs of counterfeit driver’s licenses and social security cards for “Mr. DS,” and “Mrs. DS,” individuals known to the Grand Jury, who were husband and wife and the owners of the STEVENS PROPERTY.

42. On or about September 21, 2020, STACIE SAUNDERS provided MARCUS WILCHER’s phone number to an attorney and stated that the phone number belonged to Mr. DS.

43. On or about September 21, 2020, STACIE SAUNDERS attempted to recruit an attorney to represent individuals who purported to be Mr. DS and Mrs. DS. Those individuals were imposters.

44. On or about October 5, 2020, STACIE SAUNDERS emailed the closing documents for the sale of the STEVENS PROPERTY to attorney MMC, a person known to the Grand Jury, and requested that the closing be scheduled as soon as possible. STACIE SAUNDERS also provided MARCUS WILCHER’s phone number to attorney MMC and stated it belonged to Mr. DS.

45. On or about October 7, 2020, two unidentified co-conspirators appeared at the law office of attorney VG and impersonated Mr. and Mrs. DS and signed the closing documents for the sale of the STEVENS PROPERTY for the price of \$300,000 in United States currency.

46. On or about October 9, 2020, MARCUS WILCHER sent a text message from telephone number (718) 255-8089 from his home in Bay Shore, Suffolk County, New York, to attorney MMC, impersonating Mr. DS and asking when he would be receiving proceeds from the sale of his home.

47. On or about October 9, 2020, attorney VG wired \$192,626 to DS4 HOLDINGS LLC and \$75,000 to SELOVER CONSULTING GROUP, both controlled by MARCUS WILCHER. The funds transferred were proceeds from the sale of the STEVENS PROPERTY.

48. On or about October 9, 2020, MARCUS WILCHER transferred \$20,000 of the proceeds of the sale of the STEVENS PROPERTY to from the SELOVER CONSULTING GROUP bank account to his personal account at Bethpage Federal Credit Union.

49. On or about October 9, 2020, MARCUS WILCHER wired \$36,700 of the proceeds of the sale of the STEVENS PROPERTY from the bank account of SELOVER CONSULTING GROUP bank account to the bank account of ERUDITE CONSULTING, controlled by STACIE SAUNDERS.
50. On or about October 9, 2020, STACIE SAUNDERS deposited a check for \$10,000 from “SF,” a person known to the Grand Jury, who represented BZ Rising LLC, the buyer of the STEVENS PROPERTY, into ERUDITE CONSULTING’s bank account. That check represented a “finder’s fee” to STACIE SAUNDERS for connecting SF with the STEVENS PROPERTY.
51. On or about October 13, 2020, MARCUS WILCHER wired \$124,000 of the STEVENS PROPERTY sale proceeds from DS4 HOLDINGS’ bank account to 4ME LOGISTICS LLC bank account.
52. On or about October 13, 2020, MARCUS WILCHER transferred \$10,000 of the STEVENS PROPERTY sale proceeds from 4ME LOGISTICS LLC bank account to Marcus Wilcher’s personal Navy Federal Credit Union account.
53. On or about October 16, 2020, MARCUS WILCHER wired \$30,000 of the STEVENS PROPERTY sale proceeds from 4ME LOGISTICS LLC bank account to Marcus Wilcher’s personal Bethpage Federal Credit Union account.
54. On or about October 16, 2020, Marcus Wilcher transferred \$15,000 of the STEVENS PROPERTY sale proceeds from his personal Bethpage Federal Credit Union account to SELOVER CONSULTING GROUP’s bank account.
55. On October 26, 2020, MARCUS WILCHER transferred \$6,800 of the STEVENS PROPERTY proceeds from 4ME LOGISTICS to Marcus Wilcher’s personal Bethpage Federal Credit Union account.

### COUNT THREE

AND THE AFORESAID GRAND JURY, by this Indictment, further accuses the defendant, ANYEKACHE HERCULES, of the crime PRACTICE OF LAW BY AN ATTORNEY WHO HAS BEEN DISBARRED in violation of §485-A of the Judiciary Law of the State of New York, committed as follows:

Said defendant, on or about and in between December 6, 2019 and December 16, 2019, in the County of Queens, State of New York, falsely held herself out as a person licensed to practice law in this state or as a person who can provide services that only attorneys are authorized to practice, to wit she prepared instruments affecting real estate, namely real estate belonging to the Estate of Martha Currin, after being disbarred and caused another person to suffer monetary loss or damages exceeding one thousand dollars or other material damage resulting from impairment of a legal right to which he or she is entitled. Said defendant was disbarred effective October 31, 2018, *Matter of Hercules* 173 AD3rd 124 (2<sup>nd</sup> Dept. 2019).

#### COUNT FOUR

AND THE AFORESAID GRAND JURY, by this Indictment, further accuses the defendants, MARCUS WILCHER, STACIE SAUNDERS, ANYEKACHE HERCULES, and JERRY CURRIN of the crime of ATTEMPTED GRAND LARCENY IN THE SECOND DEGREE in violation of §110/155.40(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, on or about and in between December 6, 2019 and December 16, 2019, in the County of Queens, State of New York, while each acting in concert and aiding the other, attempted to steal property, namely a residential property belonging to the Estate of Martha Currin, and the value of such property exceeded fifty thousand dollars.

#### COUNT FIVE

AND THE AFORESAID GRAND JURY, by this Indictment, further accuses the defendants, MARCUS WILCHER, STACIE SAUNDERS and ANYEKACHE HERCULES, of the crime of ATTEMPTED GRAND LARCENY IN THE SECOND DEGREE in violation of §110/155.40(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, on or about and in between December 9, 2019 and December 16, 2019, in the County of Queens, State of New York, while each acting in concert and aiding the other, attempted to steal property, namely a residential property belonging to “EM,” a person known to the Grand Jury and the value of such property exceeded fifty thousand dollars.

COUNT SIX

AND THE AFORESAID GRAND JURY, by this Indictment, further accuses the defendant, ANYEKACHE HERCULES, of the crime of CRIMINAL IMPERSONATION IN THE SECOND DEGREE in violation of §190.25(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about and in between November 21, 2019, in the County of Queens, State of New York, impersonated another, namely “JE”, and acted as such assumed character with the intent to obtain a benefit, injure or defraud another, namely Karen Davis.

COUNT SEVEN

AND THE AFORESAID GRAND JURY, by this Indictment, further accuses the defendants, MARCUS WILCHER, STACIE SAUNDERS, ANYEKACHE HERCULES and JERRY CURRIN, of the crime of GRAND LARCENY IN THE SECOND DEGREE in violation of §155.40(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, on or about January 6, 2020, in the County of Queens, State of New York, while each acting in concert and aiding the other, stole property, namely a residential property belonging to the Estate of Martha Currin, and the value of such property exceeded fifty thousand dollars.

COUNT EIGHT

AND THE AFORESAID GRAND JURY, by this Indictment, further accuses the defendants, MARCUS WILCHER, STACIE SAUNDERS, ANYEKACHE HERCULES and JERRY CURRIN, of the crime of MONEY LAUNDERING IN THE SECOND DEGREE in violation of §470.15(3)(b)(i)(B)(ii) of the Penal Law of the State of New York, committed as follows:

Said defendants, on or about and in between January 10, 2020 and January 24, 2020, in the County of Queens, State of New York and elsewhere in the State of New York, conducted financial transactions involving property represented to be the proceeds of specified criminal conduct, to wit: Grand Larceny in the Second Degree, specifically, the theft of real property belonging to the Estate of Martha Currin, with the intent to conceal or disguise the nature, the location, the source, the ownership or the control of property believed to be the proceeds of the aforementioned criminal conduct and that the total represented value of such property involved in such financial transactions exceeded one hundred thousand dollars.

COUNT NINE

AND THE AFORESAID GRAND JURY, by this Indictment, further accuses the defendants, MARCUS WILCHER, STACIE SAUNDERS, ANYEKACHE HERCULES and JERRY CURRIN, of the crime of FORGERY IN THE SECOND DEGREE in violation of §170.10(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, on or about January 6, 2020, in the County of Queens, State of New York, while each acting in concert and aiding the other, with the intent to defraud, deceive, or injure another, namely the Estate of Martha Currin, made, completed or altered a written instrument which purported to be a deed which does or may evidence, create, transfer, terminate or otherwise affect a legal right, interest, obligation or status.

COUNT TEN

AND THE AFORESAID GRAND JURY, by this Indictment, further accuses the defendant, MARCUS WILCHER, of the crime of CRIMINAL POSSESSION OF A FORGED INSTRUMENT IN THE SECOND DEGREE in violation of §170.25 of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about and in between September 24, 2019 and January 6, 2020, in the County of Queens, State of New York, with the knowledge that it is forged and with the intent to defraud, deceive, or injure another, namely the Estate of Martha Currin, possessed a forged instrument, namely a forged Connecticut driver's license under the name Karen Davis.

COUNT ELEVEN

AND THE AFORESAID GRAND JURY, by this Indictment, further accuses the defendants, MARCUS WILCHER, STACIE SAUNDERS, ANYEKACHE HERCULES and JERRY CURRIN, of the crime of OFFERING A FALSE INSTRUMENT FOR FILING IN THE FIRST DEGREE in violation of §175.35 of the Penal Law of the State of New York, committed as follows:

Said defendants, on or about January 6, 2020 in the County of Queens, and elsewhere in the State of New York, knowing that a written instrument contained a false statement and false information, and with intent to defraud the State of New York, offered or presented it to a public office, public servant, public authority or public benefit corporation with the knowledge and belief that it would be filed with, registered and recorded in, and otherwise become a part of the records of such public office, public servant, public authority and public benefit corporation, to wit: a deed bearing false signatures filed with the New York State Department of Finance.



COUNT TWELVE

AND THE AFORESAID GRAND JURY, by this Indictment, further accuses the defendants, MARCUS WILCHER, STACIE SAUNDERS, ANYEKACHE HERCULES, JERRY CURRIN, and DEAN LLOYD of the crime of GRAND LARCENY IN THE SECOND DEGREE in violation of §155.40(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, on or about and in between January 19, 2020 and June 23, 2020, in the County of Queens, State of New York, while each acting in concert and aiding the other, stole property, namely a residential property belonging to the Estate of Lucy Smith, and the value of such property exceeded fifty thousand dollars.

COUNT THIRTEEN

AND THE AFORESAID GRAND JURY, by this Indictment, further accuses the defendants, MARCUS WILCHER, STACIE SAUNDERS, ANYEKACHE HERCULES and DEAN LLOYD, of the crime of MONEY LAUNDERING IN THE SECOND DEGREE in violation of §470.15(3)(b)(i)(B)(ii) of the Penal Law of the State of New York, committed as follows:

Said defendants, on or about and in between June 23, 2020 and July 1, 2020, in the County of Queens, State of New York and elsewhere in the State of New York and State of Pennsylvania, conducted one or more financial transactions involving property represented to be the proceeds of specified criminal conduct to wit: Grand Larceny in the Second Degree, specifically the theft of real property belonging to the Estate of Lucy Smith, with the intent to conceal or disguise the nature, the location, the source, the ownership or the control of property believed to be the proceeds of the aforementioned criminal conduct and that the total represented value of such property involved in such financial transactions exceeds one hundred thousand dollars.

COUNT FOURTEEN

AND THE AFORESAID GRAND JURY, by this Indictment, further accuses the defendants, MARCUS WILCHER, STACIE SAUNDERS, ANYEKACHE HERCULES and DEAN LLOYD, of the crime of MONEY LAUNDERING IN THE SECOND DEGREE in violation of §470.15(2)(b)(ii)(A)(iii) of the Penal Law of the State of New York, committed as follows:

Said defendants, on or about and in between June 23, 2020 and July 1, 2020, in the County of Queens, State of New York and elsewhere in the State of New York and State of Pennsylvania, knowing that one or more monetary instruments represents the proceeds of specified criminal conduct to wit: Grand Larceny in the Second Degree for the theft of real property belonging to the Estate of Lucy Smith, he or she transported, transmitted, transferred or attempted to transport, transmit or transfer on one or more occasions, monetary instruments which in fact represents the proceeds of specified criminal conduct from a place in any county in this state to or through a place outside that county or to a place in any county in this state from or through a place outside that county knowing that such transportation, transmittal or transfer is designed in whole or in part to conceal or disguise the nature, the location, the source, the ownership or the control of the proceeds of the aforementioned specified criminal conduct and that the total represented value of such property involved in such financial transactions exceeds one hundred thousand dollars.

COUNT FIFTEEN

AND THE AFORESAID GRAND JURY, by this Indictment, further accuses the defendant, ANYEKACHE HERCULES, of the crime PRACTICE OF LAW BY AN ATTORNEY WHO HAS BEEN DISBARRED in violation of §485-A of the Judiciary Law of the State of New York, committed as follows:

Said defendant, on or about February 27, 2020, in the County of Queens, State of New York, falsely held herself out as a person licensed to practice law in this state or as a person who can provide services that only attorneys are authorized to provide, to wit she prepared instruments affecting real estate, namely real estate belonging to the Estate of Lucy Smith, after being disbarred and caused another person to suffer monetary loss or damages exceeding one thousand dollars, or other material damage resulting from impairment of a legal right to which he or she is entitled. Said defendant was disbarred effective October 31, 2018, *Matter of Hercules* 173 AD3rd 124 (2<sup>nd</sup> Dept. 2019).

#### COUNT SIXTEEN

AND THE AFORESAID GRAND JURY, by this Indictment, further accuses the defendant, ANYEKACHE HERCULES, of the crime PRACTICE OF LAW BY AN ATTORNEY WHO HAS BEEN DISBARRED in violation of §485-A of the Judiciary Law of the State of New York, committed as follows:

Said defendant, on or about May 31, 2020, in the County of Queens, State of New York, falsely held herself out as a person licensed to practice law in this state or as a person who can provide services that only attorneys are authorized to practice, to wit she prepared instruments affecting real estate instruments affecting the probate of an estate, namely the Estate of Lucy Smith, after being disbarred and caused another person to suffer monetary loss or damages exceeding one thousand dollars or other material damage resulting from impairment of a legal right to which he or she is entitled. Said defendant was disbarred effective October 31, 2018, *Matter of Hercules* 173 AD3rd 124 (2<sup>nd</sup> Dept. 2019).

COUNT SEVENTEEN

AND THE AFORESAID GRAND JURY, by this Indictment, further accuses the defendants, MARCUS WILCHER, STACIE SAUNDERS, ANYEKACHE HERCULES, JERRY CURRIN, and DEAN LLOYD of the crime of FORGERY IN THE SECOND DEGREE in violation of §170.10(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, on or about June 23, 2020, in the County of Nassau, State of New York, in furtherance of a conspiracy in which at least one overt act in furtherance thereof was committed in the County of Queens, State of New York, while each acting in concert and aiding the other, with the intent to defraud, deceive, or injure another, namely the Estate of Lucy Smith, made, completed or altered a written instrument which purported to be a deed which does or may evidence, create, transfer, terminate or otherwise affect a legal right, interest, obligation or status.

COUNT EIGHTEEN

AND THE AFORESAID GRAND JURY, by this Indictment, further accuses the defendants, MARCUS WILCHER, STACIE SAUNDERS, ANYEKACHE HERCULES, JERRY CURRIN, and DEAN LLOYD of the crime of OFFERING A FALSE INSTRUMENT FOR FILING IN THE FIRST DEGREE in violation of §175.35 of the Penal Law of the State of New York, committed as follows:

Said defendants, on or about June 23, 2020, in the County of Queens, State of New York, while each acting in concert and aiding the other, knowing that a written instrument contained a false statement and false information, and with intent to defraud the State of New York, offered and presented it to a public office, public servant, public authority and public benefit corporation with the knowledge and belief that it would be filed with, registered and recorded in, and otherwise become a part of the records of such

public office, public servant, public authority and public benefit corporation, to wit: a deed bearing false signatures filed with the New York State Department of Finance

COUNT NINETEEN

AND THE AFORESAID GRAND JURY, by this Indictment, further accuses the defendant, JERRY CURRIN, of the crime of OFFERING A FALSE INSTRUMENT FOR FILING IN THE FIRST DEGREE in violation of §175.35 of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about May 6, 2020, in the County of Queens, State of New York, while each acting in concert and aiding the other, knowing that a written instrument contained a false statement and false information, and with intent to defraud the State of New York, offered and presented it to a public office, public servant, public authority and public benefit corporation with the knowledge and belief that it would be filed with, registered and recorded in, and otherwise become a part of the records of such public office, public servant, public authority and public benefit corporation, to wit: an heirship affidavit.

COUNT TWENTY

AND THE AFORESAID GRAND JURY, by this Indictment, further accuses the defendant, DEAN LLOYD of the crime of CRIMINAL POSSESSION OF A FORGED INSTRUMENT IN THE SECOND DEGREE in violation of §170.25 of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about June 23, 2020, in the County of Nassau, State of New York, in furtherance of a conspiracy in which at least one overt act in furtherance thereof was committed in the County of Queens, State of New York, with the knowledge that it is forged and with the intent to defraud, deceive, or injure possessed a forged instrument, namely a forged New York State Driver's License.

COUNT TWENTY-ONE

AND THE AFORESAID GRAND JURY, by this Indictment, further accuses the defendant, ANYEKACHE HERCULES, of the crime of CRIMINAL IMPERSONATION IN THE SECOND DEGREE in violation of §190.25(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about and in between March 24, 2020, in the County of Queens, State of New York, impersonated another, namely “JE”, and acted in such assumed character with the intent to obtain a benefit, injure or defraud another, namely Michael Smith.

COUNT TWENTY-TWO

AND THE AFORESAID GRAND JURY, by this Indictment, further accuses the defendant, DEAN LLOYD, of the crime of CRIMINAL IMPERSONATION IN THE SECOND DEGREE in violation of §190.25(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about and in between June 23, 2020, in the County of Nassau, State of New York, in furtherance of a conspiracy of which at least one overt act occurred in Queens County, impersonated another, namely Michael Smith, and acted in such assumed character with the intent to obtain a benefit, injure or defraud another, namely Michael Smith.

COUNT TWENTY-THREE

AND THE AFORESAID GRAND JURY, by this Indictment, further accuses the defendants, MARCUS WILCHER and STACIE SAUNDERS, of the crime of GRAND LARCENY IN THE SECOND DEGREE in violation of §155.40(1) of the Penal Law of the State of New York, committed as follows:

Said defendants, on or about and in between September 20, 2020 and October 7, 2020, in the County of Queens, State of New York, while each acting in concert and aiding the other, stole property, namely a residential property belonging to Mr. “DS”, and the value of such property exceeded fifty thousand dollars.

COUNT TWENTY-FOUR

AND THE AFORESAID GRAND JURY, by this Indictment, further accuses the defendants, MARCUS WILCHER and STACIE SAUNDERS, of the crime of MONEY LAUNDERING IN THE SECOND DEGREE in violation of §470.15(3)(b)(i)(B)(ii) of the Penal Law of the State of New York, committed as follows:

Said defendants, on or about and in between October 7, 2020 and October 26, 2020, in the County of Queens, State of New York and elsewhere in the State of New York and State of Georgia, knowing that one or more financial transaction involved the proceeds of specified criminal conduct to wit: Grand Larceny in the Second Degree, involving the theft of real property belonging to Mr. “DS”, with the intent to conceal or disguise the nature, the location, the source, the ownership or the control of property believed to be the proceeds of the aforementioned larceny and that the total represented value of such property involved in such financial transactions exceeded one hundred thousand dollars.

COUNT TWENTY-FIVE

AND THE AFORESAID GRAND JURY, by this Indictment, further accuses the defendants, MARCUS WILCHER and STACIE SAUNDERS, of the crime of MONEY LAUNDERING IN THE SECOND DEGREE in violation of §470.15(2)(b)(ii)(A)(iii) of the Penal Law of the State of New York, committed as follows:

Said defendants, on or about and in between October 7, 2020 and October 26, 2020, in the County of Queens, State of New York and elsewhere in the State of New York and State of Georgia, transported transmitted or transferred or attempted to transport transmit or transfer on one or more occasion monetary instruments which represented the proceeds of specified criminal activity to wit: Grand Larceny in the Second Degree, involving the proceeds of the theft of real property belonging to Mr. "DS", from a county within New York state to an outside county, with the intent to conceal or disguise the nature, the location, the source, the ownership or the control of property believed to be the proceeds of the aforementioned larceny and that the total represented value of such property involved in such financial transactions exceeds one hundred thousand dollars.

COUNT TWENTY-SIX

AND THE AFORESAID GRAND JURY, by this Indictment, further accuses the defendants, MARCUS WILCHER and STACIE SAUNDERS, of the crime of OFFERING A FALSE INSTRUMENT FOR FILING IN THE FIRST DEGREE in violation of §175.35 of the Penal Law of the State of New York, committed as follows:

Said defendants, on or about October 7, 2020, in the County of Queens, State of New York, while each acting in concert and aiding the other, knowing that a written instrument contained a false statement and false information, and with intent to defraud the State of New York, offered and presented it to a public office, public servant, public authority and public benefit corporation with the knowledge and belief that it would be filed with, registered and recorded in, and otherwise become a part of the records of such public office, public servant, public authority and public benefit corporation, to wit: a deed bearing false signatures filed with the New York State Department of Finance



COUNT TWENTY-SEVEN

AND THE AFORESAID GRAND JURY, by this Indictment, further accuses the defendant, MARCUS WILCHER of the crime of CRIMINAL POSSESSION OF A FORGED INSTRUMENT IN THE SECOND DEGREE in violation of §170.25 of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about September 20, 2020, in the County of Queens, State of New York and elsewhere in the State of New York, with the knowledge that it is forged and with the intent to defraud, deceive, or injure possessed a forged instrument, namely a forged New York State Driver's License under Mr. "DS's" name.

COUNT TWENTY-EIGHT

AND THE AFORESAID GRAND JURY, by this Indictment, further accuses the defendant, MARCUS WILCHER of the crime of CRIMINAL POSSESSION OF A FORGED INSTRUMENT IN THE SECOND DEGREE in violation of §170.25 of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about September 20, 2020, in the County of Queens, State of New York and elsewhere in the State of New York, with the knowledge that it is forged and with the intent to defraud, deceive, or injure possessed a forged instrument, namely a forged New York State Driver's License under Mrs. "DS's" name.

COUNT TWENTY-NINE

AND THE AFORESAID GRAND JURY, by this Indictment, further accuses the defendant, MARCUS WILCHER, of the crime of CRIMINAL IMPERSONATION IN THE SECOND DEGREE in violation of §190.25(1) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about and in between October 9, 2020, in the County of Suffolk, State of New York, in furtherance of a conspiracy of which at least one overt act occurred in Queens County, impersonated another, namely Mr. "DS", and acted in such assumed character with the intent to obtain a benefit, injure or defraud another, namely Mr. "DS."

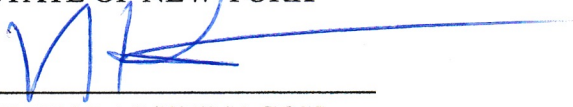
COUNT THIRTY

THE GRAND JURY OF THE COUNTY OF QUEENS, by this Indictment, accuses the defendants, MARCUS WILCHER, STACIE SAUNDERS, ANYEKACHE HERCULES and JERRY CURRIN, of the crime of SCHEME TO DEFRAUD IN THE FIRST DEGREE in violation of §190.65(1)(b) of the Penal Law of the State of New York, committed as follows:

Said defendants, on or about and in between September 16, 2019 and October 26, 2020, in the County of Queens and County of Nassau, State of New York, while acting in concert and aiding one another, took, engaged in a scheme constituting a systemic ongoing course of conduct with the intent to defraud more than one person or to obtain property from more than one person by false or fraudulent pretenses, representations or promises, and so obtained property from one or more of such persons with a value in excess of one thousand dollars.

LETITIA JAMES  
ATTORNEY GENERAL  
STATE OF NEW YORK

BY:

  
\_\_\_\_\_  
NICHOLAS KYRIACOU  
AIDA VERNON  
ASSISTANT ATTORNEYS GENERAL