HW/2008R01281

UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY

UNITED STATES				:	•	Hon.			
				:					
	v.			:		Crim.	No.		
				:					
VINCENZO	JAMES	BENDER	III	:		18 U.	U.S.C.	§	641;
						18 U.	s.c.	§	2

INFORMATION

The defendant having waived in open court prosecution by Indictment, the United States Attorney for the District of New Jersey charges:

1. At all times relevant to this Information:

a. the United States Postal Service ("the USPS") was an agency of the United States;

b. the USPS issued special credit cards called Voyager cards to trucking companies that entered into contracts with the USPS for long-haul trucking of U.S. Mail. Employees who worked for those contractors as truck drivers used the Voyager cards to buy fuel for their trucks to transport mail under their employer's contract with the USPS; and

c. the defendant VINCENZO JAMES BENDER III was employed by a trucking company as a truck driver and regularly drove trucks hauling U.S. Mail. In that capacity, the defendant

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VINCENZO JAMES BENDER III used Voyager cards issued to both his employer and a related company to buy fuel.

2. From on or about November 9, 2005 to on or about October 15, 2008, at Bellmawr, in the District of New Jersey, and elsewhere, the defendant

VINCENZO JAMES BENDER III

knowingly and willfully did (a) embezzle, steal, purloin, and without authority convert Voyager cards to his own use and gain and the use and gain of another, and (b) receive, conceal, and retain Voyager cards with intent to convert them to his use and gain, knowing them to have been embezzled, stolen, purloined, and converted without authority to his own use and gain and the use and gain of another, by using Voyager cards without authorization to purchase fuel for his own use and gain, thereby causing the USPS, an agency of the United States, to lose \$335,825, with the intent to deprive the USPS of the use and benefit of those funds.

In violation of Title 18, United States Code, Section 641, and Title 18, United States Code, Section 2.

PAUL J. AISHMAN United States Attorney

CASE NUMBER: <u>2008R01281</u>

United States District Court District of New Jersey

United States of America

v.

Vincenzo James Bender III

INFORMATION FOR

18 U.S.C. § 641 18 U.S.C. § 2

PAUL J. FISHMAN

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