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UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

United States of America,  
  
Plaintiff,

v.

Reggie Jackson,  
  
Defendant.

Case:2:17-cr-20724  
Judge: Cleland, Robert H.  
MJ: Stafford, Elizabeth A.  
Filed: 10-27-2017 At 09:24 AM  
INDI USA V. JACKSON (NA)

Violations:  
18 U.S.C. § 1029(a)(3)  
18 U.S.C. § 1028A(a)(1)

INDICTMENT

THE GRAND JURY CHARGES:

COUNT ONE

(18 U.S.C. § 1029(a)(3) – Possession of  
Fifteen or More Counterfeit or Unauthorized Access Devices)

On or about May 12, 2017, in the Eastern District of Michigan, the  
defendant **Reggie Jackson**, knowingly and with intent to defraud,  
possessed fifteen or more counterfeit and unauthorized access devices  
as defined by 18 U.S.C. § 1029(e)(1), (e)(2), and (e)(3), to wit:  
approximately 50 fraudulent credit cards and/or bank cards and 47  
counterfeit driver's licenses of other individuals without their  
knowledge and consent, said possession affecting interstate and foreign  
commerce, in violation of 18 U.S.C. § 1029(a)(3) and (c)(1)(A)(i).

**COUNT TWO**

(18 U.S.C. § 1028A(a)(1) –  
Aggravated Identity Theft)

On or about May 12, 2017, in the Eastern District of Michigan, the defendant **Reggie Jackson**, did knowingly possess, without lawful authority, a means of identification of another person during and in relation to a felony violation enumerated in 18 U.S.C. § 1028A(c), to wit: possession of 47 counterfeit driver's licenses of other individuals without their knowledge and consent, in violation of 18 U.S.C. § 1029(a)(3), all in violation of 18 U.S.C. § 1028A(a)(1).

**FORFEITURE ALLEGATION**

1. Upon conviction of an offense in violation of Title 18, United States Code, Section 1029 set forth in Counts One through Two of this Indictment, the defendant, **Reggie Jackson**, shall forfeit to the United States of America --

(A) pursuant to Title 18, United States Code, Section 982(a)(2)(B), any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of such violation(s);

(B) pursuant to Title 18, United States Code, Section 1029(c)(1)(C), any personal property used or intended to be used to commit the offense.

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

- 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 pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Sections 982(b)(1) and 1029(c)(2) and Title 28, United States Code, Section 2461(c).

All pursuant to 18 U.S.C. §§ 982(a)(2)(B) and 1029(c)(1)(C) and 28 U.S.C. § 2461(c).

THIS IS A TRUE BILL.

Dated:

10/26/17

s/ Grand Jury Foreperson  
Grand Jury Foreperson

DANIEL L. LEMISCH  
Acting United States Attorney

s/ Matthew Roth  
Matthew Roth  
Chief, General Crimes Unit

s/ Shane Cralle  
Shane Cralle  
Assistant U.S. Attorney

s/ Jihan Williams  
Jihan Williams  
Assistant U.S. Attorney

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United States District Court Eastern District of Michigan	<b>Criminal Case Cov</b>
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NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it accurately in all respects.

<b>Companion Case Information</b>	Companion Case Number:
This may be a companion case based upon LCrR 57.10 (b)(4) <sup>1</sup> :	Judge Assigned:
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	AUSA's Initials: <u>JMW</u>

Case Title: USA v. Reggie Jackson

County where offense occurred : Wayne

Check One:  Felony  Misdemeanor  Petty

Indictment/  Information --- no prior complaint.  
 Indictment/  Information --- based upon prior complaint [Case number: 17-mj-30439 ]  
 Indictment/  Information --- based upon LCrR 57.10 (d) [Complete Superseding section below].

**Superseding Case Information**


Superseding to Case No: \_\_\_\_\_ Judge: \_\_\_\_\_

- Corrects errors; no additional charges or defendants.
- Involves, for plea purposes, different charges or adds counts.
- Embraces same subject matter but adds the additional defendants or charges below:

Defendant name	Charges	Prior Complaint (if applicable)
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Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.

October 26, 2017  
Date

  
 \_\_\_\_\_  
 Jihan Williams  
 Assistant United States Attorney  
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 Detroit, MI 48226-3277  
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<sup>1</sup> Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.