

**United States District Court
District of New Jersey**

UNITED STATES OF AMERICA : Hon. Cathy L. Waldor
v. :
 : Mag. No. 13-7178 (CLW)
 :
DANTE G. DIXON and :
CHRISTOPHER L. HENDERSON : **CRIMINAL COMPLAINT**

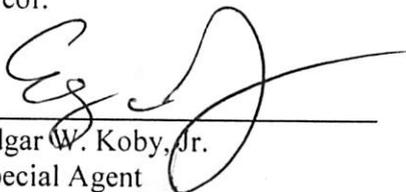
I, Edgar W. Koby, Jr., the undersigned complainant being duly sworn, state the following is true and correct to the best of my knowledge and belief:

SEE ATTACHMENT A.

I further state that I am a Special Agent with the Federal Bureau of Investigation and that this complaint is based on the following facts:

SEE ATTACHMENT B.

continued on the attached pages and made a part hereof.

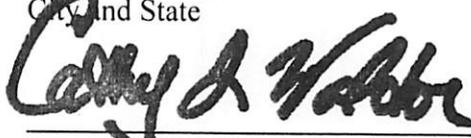


Edgar W. Koby, Jr.
Special Agent
Federal Bureau of Investigation

Sworn to before me and subscribed in my presence,

July 29, 2013 at
Date

Hon. Cathy L. Waldor
United States Magistrate Judge
Name & Title of Judicial Officer

Newark, New Jersey
City and State


Signature of Judicial Officer

ATTACHMENT A

From at least as early as in or about May 2013 through in or about June 2013, in the District of New Jersey and elsewhere, defendants:

**Dante G. Dixon and
Christopher L. Henderson**

did knowingly and intentionally conspire and agree with each other and with others to devise a scheme and artifice to defraud, and to obtain money and property by means of materially false and fraudulent pretenses, representations and promises, and for the purpose of executing such scheme and artifice, to transmit and cause to be transmitted by means of wire communications in interstate commerce certain writings, signs, signals, pictures, and sounds, contrary to 18 U.S.C. § 1343.

In violation of 18 U.S.C. § 1349.

ATTACHMENT B

I, Edgar W. Koby, Jr., a Special Agent with the Federal Bureau of Investigation, having conducted this investigation and discussed this matter with other law enforcement officers who have participated in the investigation, have knowledge of the facts set forth below. Because this affidavit is being submitted for the limited purpose of establishing probable cause, I have not included every detail of every aspect of the investigation.

The Defendants and Other Parties

At all times relevant to this Complaint:

Defendant Dante G. Dixon (“Dixon”) was a resident of Miami, Florida and Akron, Ohio;

Defendant Christopher L. Henderson (“Henderson”) was a resident of Akron, Ohio;
and

Jet Aviation is an international business aviation services company, with U.S. headquarters in Teterboro, New Jersey, which provides charter flight services.

Introduction

1. From May through June of 2013, defendants Dixon and Henderson and others conspired to fraudulently obtain at least four private charter flights from Jet Aviation, as well as tens of thousands of dollars in other luxury goods and services, via sham lines of credit issued to a well-known financial institution for the defendants and others’ use, by misrepresenting that they and others were employees at the financial institution when, in fact, none of them were ever employees at the financial institution.

The Conspiracy

2. On or about May 5, 2013, an individual using the name “Josh Stevens” called Jet Aviation’s offices in Chicago, Illinois and Van Nuys, California to inquire about Jet Aviation’s private charter flight services. That individual identified himself as being employed as a senior vice president at a well-known financial institution and provided an email address purporting to be affiliated with the financial institution. It was later determined that this email address was not, in fact, affiliated with the financial institution.
 3. Thereafter, a Jet Aviation employee sent an email to the above referenced email address. The email from Jet Aviation contained a draft Charter Services Agreement, which was signed by “Josh Stevens” and returned to Jet Aviation on or about May 9, 2013. The Agreement falsely listed “Josh Stevens” as a senior vice president, defendant Dixon as a vice president, and defendant Henderson as a vice president of international affairs, all at the well-known financial institution.
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4. On or about May 21, 2013, based on the false information provided by "Josh Stevens," a Jet Aviation employee created an account and a \$350,000 line of credit for the defendants and others. The line of credit was in the name of the financial institution on behalf, and for the use, of the defendants and others. These transactions were arranged via email correspondence and phone calls, which were transmitted in interstate commerce.
 5. Thereafter, defendants Dixon and Henderson and others used the sham line of credit to take the following four Jet Aviation private charter flights:
 - a. On or about May 30, 2013, defendant Dixon flew from Miami, Florida to Akron, Ohio;
 - b. On or about June 1, 2013, defendant Henderson flew from Camarillo, California to Akron, Ohio;
 - c. On or about June 3, 2013, defendants Dixon and Henderson flew from Akron, Ohio to Teterboro, New Jersey; and
 - d. On or about June 7, 2013, defendants Dixon and Henderson flew from Teterboro, New Jersey to Miami, Florida.
 6. On or about June 7, 2013, a Jet Aviation employee at its headquarters in Teterboro, New Jersey, met defendants Dixon and Henderson before they boarded their charter flight to Miami, Florida. During the meeting, the defendants identified themselves as being employees at the financial institution. The Jet Aviation employee then contacted the financial institution and was informed that defendants Dixon and Henderson and others were not then, and had never previously been, employees at the financial institution.
 7. As a result of their misrepresentations to Jet Aviation, defendants Dixon and Henderson and others fraudulently obtained private high-end charter flights and limousine car services, with a total approximate value of \$175,790. Jet Aviation never received payment from the defendants and others, or from the financial institution's line of credit, for any of the services provided to the defendants and others, including the approximately \$164,911 in charter flights and the approximately \$10,879 in limousine services.
 8. The investigation has revealed that the financial institution was not aware that defendants Dixon and Henderson and others were using its corporate identity.
 9. Defendants Dixon and Henderson and others made similar misrepresentations about their purported employment at the financial institution to other luxury service providers, including to a Tiffany & Co. store ("Tiffany") in Bal Harbour, Florida, and to the W South Beach Hotel (the "W") in Miami, Florida. These misrepresentations resulted in the defendants and others fraudulently obtaining, via sham lines of credit with Tiffany and the W, approximately \$19,991 in watches, sunglasses, sterling silver and leather business car holders, and men's cologne from Tiffany, and approximately \$25,466 in overnight hotel stays at the W.
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10. As a result of their scheme, defendants Dixon and Henderson and others fraudulently obtained more than \$220,000 in luxury goods and services.