

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Criminal No. 13-
 :
 v. : 18 U.S.C. §§ 1349 and 1708
 :
 MICHAEL A. INGALLS, JR. :
 a/k/a "Mighty Mike" :
 a/k/a "Mighty"

INFORMATION

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

COUNT ONE

(BANK FRAUD CONSPIRACY - 18 U.S.C. § 1349)

The Defendant and The Victims

1. At all times relevant to this Information, the defendant MICHAEL A. INGALLS, JR., a/k/a "Mighty Mike," a/k/a "Mighty" was a resident of New Jersey.

2. At all times relevant to this Information, Citizen's Bank, Wells Fargo Bank, TD Bank, Columbia Savings Bank, Bank Of America, Beneficial Bank, Cape May Bank, Capital Bank, Chase Bank of New York, First Colonial Bank, First Niagra Bank, GCF Bank, J.P. Morgan Chase Bank, M&T Bank, National Penn Bank, Ocean City Home Bank, PNC Bank, Provident Bank, Sun

National Bank, Sun Trust Bank, Susquehanna Bank, The Bank, and Wachovia Bank (hereinafter, the "Victim Banks") were financial institutions as defined in Title 18, United States Code, Section 20, whose deposits were insured by the Federal Deposit Insurance Corporation.

The Conspiracy

3. From in or about September 2010 through in or about January 19, 2012, in Camden, Burlington, and Gloucester Counties, in the District of New Jersey and elsewhere, the defendant,

MICHAEL A. INGALLS, JR.,
a/k/a "Mighty Mike,"
a/k/a "Mighty,"

did knowingly and intentionally conspire and agree with Ibn Muhammad, a/k/a "E," and others, to execute a scheme and artifice to defraud financial institutions, namely the Victim Banks, and to obtain moneys, funds, assets, securities, and other property owned by, and under the custody and control of, the financial institutions by means of materially false and fraudulent pretenses, representations, and promises, contrary to Title 18, United States Code, Section 1344.

The Object of the Conspiracy

4. It was the object of the conspiracy to obtain money by stealing checks from the United States Mails, converting the stolen checks to the conspirators' own use, altering or forging the stolen checks, and cashing the stolen checks at financial institutions.

The Manner and Means of the Conspiracy

5. It was part of the conspiracy that defendant MICHAEL A. INGALLS, JR., a/k/a "Mighty Mike," a/k/a "Mighty" and his co-conspirator Ibn Muhammad, a/k/a "E," and their co-conspirators, stole from the United States Mails and converted to their own use, over 100 business checks, from various businesses in Burlington, Camden, and Gloucester Counties in the District of New Jersey and elsewhere.

6. It was further part of the conspiracy that defendant MICHAEL A. INGALLS, JR., a/k/a "Mighty Mike," a/k/a "Mighty" and his co-conspirator Ibn Muhammad, a/k/a "E," recruited A.F., F.L., R.B., J.G., N.Y., D.W., B.V., and others (collectively, the "Check Cashers") in and around New Jersey to present the stolen checks at Victim Banks.

7. It was further part of the conspiracy that defendant MICHAEL A. INGALLS, JR., a/k/a "Mighty Mike," a/k/a "Mighty" and his co-conspirator Ibn Muhammad, a/k/a "E," altered

the stolen business checks and forged the names of the payee to match the name of a recruited Check Cashier.

8. It was further part of the conspiracy that defendant MICHAEL A. INGALLS, JR., a/k/a "Mighty Mike," a/k/a "Mighty" and his co-conspirator Ibn Muhammad, a/k/a "E," transported and caused to be transported the Check Cashiers from various locations in New Jersey to Victim Banks.

9. It was further part of the conspiracy that defendant MICHAEL A. INGALLS, JR., a/k/a "Mighty Mike," a/k/a "Mighty" and his co-conspirator Ibn Muhammad, a/k/a "E," directed the Check Cashiers to present the altered and forged business checks at the Victim Banks in an effort to fraudulently obtain money. To this end, the Check Cashiers fraudulently cashed or attempted to cash over 100 altered and forged business checks at the Victim Banks resulting in over \$300,000 in losses to the Victim Banks and \$300,000 in attempted losses.

10. It was further part of the conspiracy that defendant MICHAEL A. INGALLS, JR., a/k/a "Mighty Mike," a/k/a "Mighty" and his co-conspirator Ibn Muhammad, a/k/a "E," shared the proceeds of the scheme and artifice to defraud with each other and with the Check Cashiers.

In violation of Title 18, United States Code, Section 1349.

COUNT TWO

(POSSESSION OF STOLEN MAIL - 18 U.S.C. § 1708)

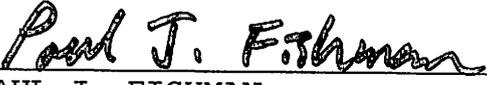
1. Paragraphs 1, 2 and 4-10 of Count One of this Information are realleged and incorporated herein.

2. On or about February 27, 2011, in Middlesex County, in the District of New Jersey, and elsewhere, the defendant,

MICHAEL A. INGALLS, JR.,
a/k/a "Mighty Mike,"
a/k/a "Mighty,"

did unlawfully have in his possession mail addressed to a company named Continuum at 61 Grays Ridge Road, Brookfield, CT 06804 which had been stolen, taken, embezzled and abstracted from a letter box or mail receptacle which was an authorized depository for mail matter, knowing that said letter to have been stolen, taken, embezzled and abstracted from an authorized depository for mail matter.

In violation of Title 18, United States Code, Section 1708.



PAUL J. FISHMAN
United States Attorney

CASE NUMBER: 2012R01157

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MICHAEL A. INGALLS, JR.,
a/k/a "Mighty Mike,"
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INFORMATION FOR

Title 18 United States Code
Sections 1349 and 1708

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