[2010R01356/DAG]

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA	:	Criminal No.
	:	
	:	18 U.S.C. § 1349
v.	:	
	:	**INFORMATION**
KURTIS STEELE	:	

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

A. The Defendant

1. At all times material to this Information, defendant KURTIS STEELE, resided in or near Irvington, Essex County, New Jersey.

B. Victim Banks

2. At all times relevant to this Information, TD Bank, Bank of America, Capital One Bank, Garden State Community Bank, Hudson City Savings Bank, Discover Bank, PNC Bank and Valley National Bank, (hereinafter the "Victim Banks"), were "financial institutions" as defined by Title 18, United States Code, Section 20, whose deposits were insured by the Federal Deposit Insurance Corporation.

The Conspiracy

3. From in or about December 2008 through in or about January 2012, in the District of New Jersey, and elsewhere, defendant

KURTIS STEELE

did knowingly and intentionally conspire and agree with others to

execute a scheme and artifice to defraud financial institutions, and to obtain money, funds, and assets owned by and under the custody and control thereof, by means of materially false and fraudulent pretenses, representations, and promises, contrary to Title 18, United States Code, Section 1344.

Object of the Conspiracy

4. The object of the conspiracy was to defraud financial institutions out of hundreds of thousands of dollars by: (1) obtaining stolen blank checks belonging to the Victim Banks' individual customers (the "stolen checks"); (2) fraudulently endorsing and depositing the stolen checks into bank accounts under the control of defendant KURTIS STEELE and his co-conspirators; and (3) withdrawing the proceeds of the stolen checks from those bank accounts.

Manner and Means of the Conspiracy

5. It was part of the conspiracy that defendant KURTIS STEELE recruited his co-conspirators to open bank accounts at the Victim Banks and other banks to accept deposits of stolen checks (hereinafter, the "fraudulent deposit accounts") in exchange for a portion of the ill-gotten proceeds of the stolen checks.

6. It was further a part of the conspiracy that defendant KURTIS STEELE and his co-conspirators would then obtain the debit cards, Personal Identification Numbers ("PINS"), and account information associated with the fraudulent deposit accounts.

7. It was further a part of the conspiracy that defendant KURTIS STEELE and his co-conspirators filled out the stolen checks

listing defendant KURTIS STEELE and his co-conspirators as payees; endorsed the stolen checks; and then deposited them and caused them to be deposited into the fraudulent deposit accounts.

8. It was further a part of the conspiracy that, after depositing the stolen checks into the fraudulent deposit accounts, defendant KURTIS STEELE and his co-conspirators then withdrew funds from the fraudulent deposit accounts, either via Automated Teller Machine (ATM), by entering the Victim Banks and filling out withdrawal slips, or by purchasing Western Union Wire Transfers.

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

FORFEITURE ALLEGATION

1. The allegations contained in this Information are hereby realleged and incorporated by reference for the purpose of noticing forfeitures pursuant to Title 18, United States Code, Sections 982(a)(2)(A).

2. The United States hereby gives notice to the defendant that, upon conviction of the offense charged in this Information, the government will seek forfeiture in accordance with Title 18, United States Code, Section 982(a)(2)(A), of any and all property constituting or derived from proceeds obtained directly or indirectly as a result of such offense.

3. If any of the above-described forfeitable property, 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;

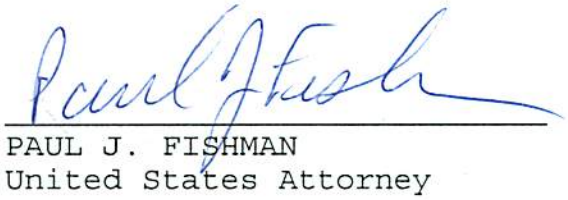
(c) has been placed beyond the jurisdiction of the court;

(d) has been substantially diminished in value; or

(e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1), to seek forfeiture

of any other property of the defendant up to the value of the forfeitable property described in this forfeiture allegation.



PAUL J. FISHMAN
United States Attorney

CASE NUMBER: 12-_____

United States District Court
District of New Jersey

UNITED STATES OF AMERICA

v.

KURTIS STEELE

INFORMATION FOR

18 U.S.C. § 1349

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