

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Criminal No. 13-
 :
 v. : 18 U.S.C. §§ 1349 and 922(g)
 :
 DERRICK WARNER :
 a/k/a "Money," :
 a/k/a "Chink," :
 a/k/a "Black," :
 a/k/a "John" :

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)

The Defendant, Co-conspirators, and The Victims

1. At all times relevant to this Information:
 - a. Defendant DERRICK WARNER, a/k/a "Money," a/k/a "Chink," a/k/a "Black," a/k/a "John," resided in New Jersey.
 - b. Vonecia B. Rhynes, who is named as a co-conspirator but not as a defendant herein, resided in Pennsauken, New Jersey.

c. I.V., a/k/a "Ivy," a/k/a "Amy," who is named as a co-conspirator but not as a defendant herein, resided in New Jersey.

d. J.R., a/k/a "Power," a/k/a "V.I.," who is named as a co-conspirator but not as a defendant herein, resided in either New Jersey or Pennsylvania.

e. I.M., a/k/a "E," who is named as a co-conspirator but not as a defendant herein, resided in either New Jersey or Pennsylvania.

2. At all times relevant to this Information, Wilmington Savings Fund Society ("WSFS"), Fulton Bank of New Jersey, TD Bank, Bank Of America, M&T Bank, National Penn Bank, PNC Bank, and Susquehanna 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 August 6, 2012 through on or about August 1, 2013, in Camden and Burlington Counties, in the District of New Jersey and elsewhere, the defendant,

DERRICK WARNER,
a/k/a "Money,"
a/k/a "Chink,"
a/k/a "Black,"
a/k/a "John,"

did knowingly and intentionally conspire and agree with Vonecia B. Rhynes, I.V., J.R., and I.M. 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 DERRICK WARNER, a/k/a "Money," a/k/a "Chink," a/k/a "Black," a/k/a "John," along with his co-conspirators, stole from the United States Mails and converted to their own use, over 500 business checks, from various businesses in the District of New Jersey, the Commonwealth of Pennsylvania, the State of Delaware, and elsewhere.

6. It was further part of the conspiracy that defendant DERRICK WARNER, a/k/a "Money," a/k/a "Chink," a/k/a "Black," a/k/a "John," and his co-conspirator J.R., and others recruited M.R., R.P., J.W.H., A.R., A.G., G.B., T.K., J.B., S.A., C.R.M., A.S., C.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 co-conspirator I.M., and others, altered the stolen business checks and forged the names of the payee to match the name of a recruited Check Casher.

8. It was further part of the conspiracy that defendant DERRICK WARNER, a/k/a "Money," a/k/a "Chink," a/k/a "Black," a/k/a "John," and his co-conspirators Vonecia B. Rhynes, J.R., I.V., and others, transported and caused to be transported the Check Cashers from various locations in New Jersey to Victim Banks located throughout New Jersey, Pennsylvania, and Delaware.

9. It was further part of the conspiracy that, at the request of and with direction from defendant DERRICK WARNER, a/k/a "Money," a/k/a "Chink," a/k/a "Black," a/k/a "John," co-conspirator Vonecia B. Rhynes rented cars on behalf of defendant DERRICK WARNER, a/k/a "Money," a/k/a "Chink," a/k/a "Black,"

a/k/a "John" at Bargain Rent-A-Car of America (hereinafter, "Bargain Rent-A-Car") in Somerdale, New Jersey that were used to transport Check Cashers from various locations in New Jersey to Victim Banks located throughout New Jersey, Pennsylvania, and Delaware.

10. It was further part of the conspiracy that defendant DERRICK WARNER, a/k/a "Money," a/k/a "Chink," a/k/a "Black," a/k/a "John," and his co-conspirators J.R. and I.V. directed the Check Cashers to present the altered and forged business checks at the Victim Banks in an effort to fraudulently obtain money. To this end, the Check Cashers fraudulently cashed or attempted to cash over 45 altered and forged business checks at the Victim Banks resulting in over \$100,000 in losses to the Victim Banks and \$100,000 in attempted losses.

11. It was further part of the conspiracy that defendant DERRICK WARNER, a/k/a "Money," a/k/a "Chink," a/k/a "Black," a/k/a "John," and his co-conspirators Vonecia B. Rhynes, J.R., I.V., and I.M. and others shared the proceeds of the scheme and artifice to defraud with each other and with the Check Cashers.

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

COUNT TWO
(Felon in Possession of a Firearm)

1. Paragraphs 1, 2 and 4-11 of Count One of this Information are realleged and incorporated herein.

2. In or about late March or early April 2013, in Camden County, in the District of New Jersey, and elsewhere, the defendant,

DERRICK WARNER,
a/k/a "Money,"
a/k/a "Chink,"
a/k/a "Black,"
a/k/a "John,"

having been convicted of crime punishable by imprisonment for a term exceeding one year in the Superior Court in the State of New Jersey, Camden County, did knowingly possess in or affecting commerce, a firearm, namely a Smith & Wesson, .44 Magnum handgun, bearing serial number AFP0714.

In violation of Title 18, United States Code, Section 922(g)(1).



PAUL J. FISHMAN
United States Attorney

CASE NUMBER: 2013R00332

United States District Court
District of New Jersey

UNITED STATES OF AMERICA

v.

DERRICK WARNER,
a/k/a "Money,"
a/k/a "Chink,"
a/k/a "Black,"
a/k/a "John,"

INFORMATION FOR

Title 18 United States Code
Sections 1349 and 922(g)

PAUL J. FISHMAN
UNITED STATES ATTORNEY
NEWARK, NEW JERSEY

MATTHEW T. SMITH
ASSISTANT UNITED STATES ATTORNEY
CAMDEN, NEW JERSEY
856-757-5026
