

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA	:	Hon.
	:	
v.	:	Criminal No.
	:	
DANTE G. DIXON	:	18 U.S.C. § 1349

INFORMATION
(Conspiracy to Commit Wire Fraud)

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

Background

1. At various times relevant to this Information:
 - a. Defendant DANTE G. DIXON (“DIXON”) was a resident of Miami, Florida, and Akron, Ohio;
 - b. Co-conspirator Christopher L. Henderson (“Henderson”), was a resident of Akron, Ohio;
 - c. Jet Aviation was an international business aviation services company that, among other things, provided charter flight services. Jet Aviation’s United States headquarters were located in Teterboro, New Jersey; and
 - d. Financial Institution #1 was an American multinational banking and financial services company headquartered in New York, New York.

The Conspiracy

2. 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, defendant

DANTE G. DIXON

did knowingly and intentionally conspire and agree with co-conspirator Henderson and 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.

Object of the Conspiracy

3. The object of the conspiracy was for defendant DIXON, co-conspirator Henderson, and others to enrich themselves by fraudulently obtaining at least four private charter flights from Jet Aviation, as well as tens of thousands of dollars in other luxury goods and services, by posing as employees of Financial Institution #1 and fraudulently obtaining lines of credit.

Methods and Means of the Conspiracy

4. 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 Financial Institution #1 and provided an email address purporting to be affiliated with Financial Institution #1.

5. 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 (the "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 co-conspirator Henderson as a vice president of international affairs at Financial Institution #1.

6. 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 defendant DIXON and his co-conspirators. The line of credit was in the name of Financial Institution #1 on behalf, and for the use, of defendant DIXON, co-conspirator Henderson, and others. These transactions were arranged via email correspondence and phone calls, which were transmitted in interstate commerce.

7. Thereafter, defendant DIXON, co-conspirator 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, co-conspirator Henderson flew from Camarillo, California to Akron, Ohio;

c. On or about June 3, 2013, defendant DIXON and co-conspirator Henderson flew from Akron, Ohio to Teterboro, New Jersey; and

d. On or about June 7, 2013, defendant DIXON and co-conspirator Henderson flew from Teterboro, New Jersey to Miami, Florida.

8. On or about June 7, 2013, a Jet Aviation employee at its headquarters in Teterboro, New Jersey, met defendant DIXON and co-conspirator Henderson before they boarded a charter flight to Miami, Florida. During the meeting, defendant DIXON identified himself and

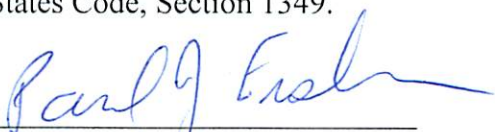
co-conspirator Henderson as being employees at Financial Institution #1. The Jet Aviation employee then contacted Financial Institution #1 and was informed that defendant DIXON and co-conspirator Henderson were not then, and had never previously been, employees at Financial Institution #1.

9. As a result of his misrepresentations to Jet Aviation, defendant DIXON, co-conspirator Henderson, and others fraudulently obtained private high-end charter flights and limousine car services, with a total approximate value of \$176,000. Jet Aviation never received payment from defendant DIXON, his co-conspirators, or from Financial Institution #1's line of credit, for any of the services provided to defendant DIXON and his co-conspirators, including the approximately \$165,000 in charter flights and the approximately \$11,000 in limousine services.

10. Defendant DIXON, co-conspirator Henderson, and others made similar misrepresentations about their purported employment at Financial Institution #1 to other luxury service providers, causing them to issue lines of credit to defendant DIXON, co-conspirator Henderson, and others, which they used to purchase, among other things, approximately \$20,000 in luxury watches, sunglasses, and sterling silver and leather business card holders, and to incur approximately \$25,500 in hotel stays at a luxury hotel in Miami, Florida.

11. As a result of the scheme and artifice to defraud, defendant DIXON, co-conspirator Henderson, and others fraudulently obtained more than \$220,000 in luxury goods and services.

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



PAUL J. FISHMAN
UNITED STATES ATTORNEY

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INFORMATION FOR

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