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**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

United States of America,

Plaintiff,

Criminal No. 17-20724

Honorable Robert H. Cleland

v.

Violations:

Reggie Jackson,

18 U.S.C. § 1029(a)(3)

18 U.S.C. § 1028A(a)(1)

18 U.S.C. § 1343

Defendant.

**SUPERSEDING INDICTMENT**

THE GRAND JURY CHARGES:

**COUNT ONE**

(18 U.S.C. § 1029(a)(3) – Possession of  
Fifteen or More Counterfeit or Unauthorized Access Devices)

On or about May 12, 2017, in the Eastern District of Michigan, the defendant, **Reggie Jackson**, knowingly and with intent to defraud, possessed fifteen or more counterfeit and unauthorized access devices as defined by 18 U.S.C. § 1029(e)(1), (e)(2), and (e)(3), to wit: approximately 50 fraudulent credit cards and/or bank cards and 47 counterfeit driver's licenses of other individuals without their knowledge and consent, said possession affecting interstate and foreign

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EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION  
DETROIT

commerce, in violation of 18 U.S.C. § 1029(a)(3) and (c)(1)(A)(i).

**COUNT TWO**

(18 U.S.C. § 1028A(a)(1) –  
Aggravated Identity Theft)

On or about May 12, 2017, in the Eastern District of Michigan, the defendant, **Reggie Jackson**, did knowingly possess, without lawful authority, a means of identification of another person during and in relation to a felony violation enumerated in 18 U.S.C. § 1028A(c), to wit: possession of 47 counterfeit driver's licenses of other individuals without their knowledge and consent, in violation of 18 U.S.C. § 1029(a)(3), all in violation of 18 U.S.C. § 1028A(a)(1).

**COUNTS THREE – TEN**

(18 U.S.C. § 1343 – Wire Fraud)

1. Capital One is located in McLean, Virginia, and offers a broad array of financial products and services, including credit card accounts.

**THE SCHEME TO DEFRAUD**

2. From in or about August 2015 and continuing to in or about May 2017, the exact dates being unknown to the grand jury, the defendant, **Reggie Jackson**, devised a scheme and artifice to defraud

and to obtain money by means of false and fraudulent pretenses, representations, and promises.

3. It was part of the scheme and artifice to defraud that the defendant, **Reggie Jackson**, did submit multiple change of address forms to the U.S. Postal Service through its website, [www.usps.com](http://www.usps.com).

4. In submitting the change of address forms, the defendant, **Reggie Jackson**, caused mail to be redirected to addresses in Southfield, Farmington Hills, and elsewhere from its true destination at locations throughout southeastern Michigan, including Ann Arbor, Birmingham, Livonia, Redford, and Warren.

5. It was further part of the scheme and artifice to defraud that the defendant, **Reggie Jackson**, opened credit applications with Capital One in victims' names and ordered cellular phones from wireless telephone providers (*i.e.*, Sprint), causing them to be mailed to the false addresses in Southfield, Farmington Hills, and elsewhere that were included in the change of address forms.

#### USE OF WIRES

6. On or about the dates specified as to each count below, the

defendant, **Reggie Jackson**, for the purpose of executing the aforesaid scheme and artifice to defraud, and attempting to do so, did knowingly transmit and cause to be transmitted, by means of wire, radio, and television communication, writings, signals, pictures, and sounds in interstate and foreign commerce for the purpose of executing such scheme and artifice as set forth below:

<b>Count</b>	<b>Approximate Date</b>	<b>Description of Wire Communication</b>
3	January 13, 2016	Submitted change of address for 2XXXX Green Hill Rd, Farmington Hills, MI 48335 to 1XXXX Prest St, Detroit, MI 48227
4	April 18, 2016	Submitted change of address for 8XXX Carlin St, Detroit, MI 48228 to 1XXXX Montrose St, Detroit, MI 48235
5	July 13, 2016	Submitted change of address for 9XXX Hogan Rd, Fenton, MI 48430 to 2XXXX Grodan Dr, Southfield, MI 48033
6	August 22, 2016	Submitted change of address for 1XXXX W 13 Mile Rd, Southfield, MI 48076 to 2XXXX Grodan Dr, Southfield, MI 48033
7	August 29, 2016	Submitted change of address for 2XXXX Belleair St, Roseville, MI 48066 to 2XXXX Grodan Dr, Southfield, MI 48033
8	November 23, 2016	Submitted change of address for 2XXXX Gateway Dr, Farmington Hills, MI 48334 to 3XXXX Crest Forest,

		Farmington Hills, MI 48331
9	November 23, 2016	Submitted change of address for 1XXXX E Meyers Ave, Hazel Park, MI 48030 to 3XXXX Crest Forest, Farmington Hills, MI 48331
10	November 29, 2016	Submitted change of address for 1XXXX Meridian Rd, Grosse Ile, MI 48138 to 3XXXX Crest Forest, Farmington Hills, MI 48331

All in violation of 18 U.S.C. § 1343.

### FORFEITURE ALLEGATION

1. Upon conviction of an offense in violation of Title 18, United States Code, Section 1029 set forth in Counts One through Two of this Indictment, the defendant, **Reggie Jackson**, shall forfeit to the United States of America --

(A) pursuant to Title 18, United States Code, Section 982(a)(2)(B), any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of such violation(s);

(B) pursuant to Title 18, United States Code, Section 1029(c)(1)(C), any personal property used or intended to be used to commit the offense.

2. If any of the property described above, 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,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Sections 982(b)(1) and 1029(c)(2) and Title 28, United States Code, Section 2461(c).

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All pursuant to 18 U.S.C. §§ 982(a)(2)(B) and 1029(c)(1)(C) and 28  
U.S.C. § 2461(c).

THIS IS A TRUE BILL.

Dated: January 23, 2018

s/ Grand Jury Foreperson  
Grand Jury Foreperson

MATTHEW SCHNEIDER  
United States Attorney

s/ Matthew Roth  
Matthew Roth  
Chief, General Crimes Unit

s/ Shane Cralle  
Shane Cralle  
Assistant U.S. Attorney

s/ Jihan Williams  
Jihan Williams  
Assistant U.S. Attorney

United States District Court Eastern District of Michigan	<b>Criminal Case Cover Sheet</b>	<b>Case Number</b> 17-20724
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NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it accurately in all respects.

<b>Companion Case Information</b>	<b>Companion Case Number:</b>
This may be a companion case based upon LCrR 57.10 (b)(4) <sup>1</sup> :	<b>Judge Assigned:</b>
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<b>AUSA's Initials:</b> <u>  G  </u>

**Case Title:** USA v. Reggie Jackson

**County where offense occurred :** Wayne

**Check One:**       **Felony**                       **Misdemeanor**                       **Petty**

Indictment/  Information --- no prior complaint.  
 Indictment/  Information --- based upon prior complaint [Case number: \_\_\_\_\_]  
 Indictment/  Information --- based upon LCrR 57.10 (d) [Complete Superseding section below].

**Superseding Case Information**

**Superseding to Case No:** 17-20724                      **Judge:** Cleland


- Corrects errors; no additional charges or defendants.
- Involves, for plea purposes, different charges or adds counts.
- Embraces same subject matter but adds the additional defendants or charges below:

<u>Defendant name</u>	<u>Charges</u>	<u>Prior Complaint (if applicable)</u>
18 U.S.C. § 1343		

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 DETROIT, MI

**Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.**

January 23, 2018  
Date

  
 \_\_\_\_\_  
**SHANE CRALLE**  
 Assistant United States Attorney  
 211 W. Fort Street, Suite 2001  
 Detroit, MI 48226-3277  
 Phone: 313-226-9551  
 Fax: 313-226-5464  
 E-Mail address: shane.cralle@usdoj.gov  
 Attorney Bar #:

<sup>1</sup> Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.