

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

RECEIVED

MAY 03 2023

AT 1:30 PM M
CLERK, U.S. DISTRICT COURT - DNJ

UNITED STATES OF AMERICA	:	Hon.
	:	
v.	:	Crim. No.
	:	
MARC LAZARRE,	:	18 U.S.C. § 1349
FRITZGERALD STEIDE,	:	18 U.S.C. § 1344(1)
MOHAMMED KHAN, and	:	18 U.S.C. § 1028A
ANDREA LEWIS	:	

INDICTMENT

The Grand Jury in and for the District of New Jersey, sitting at Newark, charges as follows:

COUNT ONE

(Bank Fraud Conspiracy)

Individuals, Entities, and Definitions

1. At all times relevant to this Indictment:
 - a. Defendant MARC LAZARRE ("LAZARRE") was a resident of Reading, Pennsylvania; Secaucus, New Jersey; and/or Brooklyn, New York.
 - b. Defendant FRITZGERALD STEIDE ("STEIDE") was a resident of Elmont and/or Valley Stream, New York and an employee of Financial Institution-1 (defined below) in Oceanside, New York.
 - c. Defendant MOHAMMED KHAN ("KHAN") was a resident of Elmont and/or Franklin Square, New York and an employee of Financial Institution-1 (defined below) in Oceanside, New York.
 - d. Defendant ANDREA LEWIS ("LEWIS") was a resident of Inwood, New York.

e. Victim-1 was a former resident of Akron, Ohio who passed away in or around 2013.

f. Victim-2 was a resident of Lawrence, New York, and owned Entity Victim-1, a limited liability company based in Oxford, New Jersey.

g. Victims-3 and -4 were married and residents of Brooklyn, New York.

h. Victim-5 was a resident of Brooklyn, New York, and owned Entity Victim-2, a construction company based in Brooklyn, New York.

i. Victim-6 was a resident of Irvine, California.

j. Entity Victim-3 is a religious educational institution based in Brooklyn, New York.

k. Entity Victim-4 is a business located in Flushing, New York.

l. Financial Institutions-1, -2, -3, -4, and -5 (collectively, the "Financial Institutions") were all insured by the Federal Deposit Insurance Corporation ("FDIC"). As such, the Financial Institutions were each federally insured financial institutions as that term is defined in 18 U.S.C. § 20.

The Conspiracy

2. From in or around September 2021 through in or around October 2022, in the District of New Jersey and elsewhere, the defendants,

**MARC LAZARRE,
FRITZGERALD STEIDE,
MOHAMMED KHAN, and
ANDREA LEWIS,**

did knowingly and intentionally conspire and agree with one another and others (collectively, “the Coconspirators”) to execute and attempt to execute a scheme and artifice to defraud financial institutions, namely the Financial Institutions, whose deposits were insured by the Federal Deposit Insurance Corporation, and to obtain monies, funds, assets, and other property owned by, and under the custody and control of, those financial institutions, by means of materially false and fraudulent pretenses, representations, and promises, contrary to Title 18, United States Code, Section 1344.

Object of the Scheme and Artifice to Defraud

3. It was the goal of the conspiracy for the Coconspirators to fraudulently:

- a. open bank accounts with the Financial Institutions under assumed identities;
- b. obtain bank cards and other credit instruments from the Financial Institutions under assumed identities; and
- c. access their victims’ bank accounts with the Financial Institutions;

using the personally identifiable information of others, and to use those fraudulently-created or fraudulently-accessed bank accounts and credit instruments to enrich themselves and others.

Manner and Means of the Conspiracy

The scheme and artifice to defraud operated in substance as follows:

Victim-1

4. On or about November 10, 2021, LAZARRE used the personally identifiable information of Victim-1 to apply for a bank account with Financial Institution-1 ("Fraudulent Account-1"), and did so without Victim-1's authorization, knowledge, or consent. LAZARRE subsequently deposited into Fraudulent Account-1 a business check that he fabricated using check-making software that law enforcement later discovered on his laptop.

Victim-2

5. On or about May 19, 2022, LAZARRE used the personally identifiable information of Victim-2 on an application for a bank account with Financial Institution-1 ("Fraudulent Account-2"), and did so without Victim-2's authorization, knowledge, or consent.

6. On or around May 20, 2022, LAZARRE deposited into Fraudulent Account-2 a United States Treasury check that was payable to Entity Victim-1.

7. On or around June 15, 2022, LAZARRE used the personally identifiable information of Victim-2 to withdraw funds and obtain cashier's checks from an actual bank account that Victim-2 maintained with Financial Institution-2, and did so without Victim-2's authorization, knowledge, or consent.

8. On or about June 16, 2022, LAZARRE used the personally identifiable information of Victim-2 on an application for a bank account with Financial Institution-3 ("Fraudulent Account-3"), and did so without Victim-2's authorization, knowledge, or consent. LAZARRE subsequently deposited into Fraudulent Account-3 a check that was payable to another of LAZARRE's victims.

9. On or before July 13, 2022, LAZARRE received documents of incorporation concerning Fraudulent Business-1. That same day, LAZARRE emailed KHAN these documents of incorporation in an email bearing Victim-2's first name in the subject line.

10. On or about July 14, 2022, LAZARRE opened a bank account at Financial Institution-1 in Fraudulent Business-1's name ("Fraudulent Account-4") using the personally identifiable information of Victim-2, and did so without Victim-2's authorization, knowledge, or consent. Bank records indicate that KHAN was the employee at Financial Institution-1 who verified the account opening documents.

Victims-3 and -4

11. On or about June 27, 2022, LAZARRE used the personally identifiable information of Victim-3 on an application for a bank account with Financial Institution-4 ("Fraudulent Account-5"), and did so without Victim-3's knowledge or consent.

12. On or about June 28, 2022, LAZARRE sent LEWIS, via the Telegram encrypted messaging service ("Telegram"), a photograph within which there was

a counterfeit Connecticut driver's license bearing Victim-4's name, but LEWIS's physical likeness. Later that day, LAZARRE and LEWIS entered a branch of Financial Institution-4 located in Bloomfield, New Jersey, and funded Fraudulent Account-5 with a United States Treasury check made out to Victims-3 and -4.

Victim-5

13. On or about August 22, 2022, LAZARRE received an email from the New York Department of State describing a registration for a new business which LAZARRE registered using the personally identifiable information of Victim-5 ("Fraudulent Business-2"). The name was similar, but not identical, to the registered name of Entity Victim-2. Later that day, LAZARRE sent Victim-5's personally identifiable information, again via Telegram, to another individual ("Coconspirator-1"). On or about August 26, 2022, a bank account was opened at Financial Institution-5 in Fraudulent Business-2's name, using Victim-5's personally identifiable information ("Fraudulent Account-6").

14. On or about September 2, 2022, an individual deposited into Fraudulent Account-6 a United States Treasury check made out to Entity Victim-2.

15. On or about September 9, 2022, a company was registered with the New York Department of State using the personally identifiable information of Victim-5 ("Fraudulent Business-3"). Fraudulent Business-3's name was similar, but not identical, to the registered name of Entity Victim-3. Also on or about that day, KHAN messaged LAZARRE: "I wish we had ppl with no accounts lol.

Specially personal. They so easyyy.” LAZARRE later messaged KHAN a list of names and social security numbers, including the personally identifiable information for Victim-5. In response, KHAN informed LAZARRE which of the listed individuals had a banking relationship with Financial Institution-1, and specifically stated: “Second one [Victim-5]. We can do. First one has an acct.”

16. On or about September 12, 2022, Coconspirator-1 sent a message to LAZARRE, via Telegram, that included an Internal Revenue Service Employment Identification Number form for Fraudulent Business-3.

17. On or about September 14, 2022, bank accounts were opened at Financial Institution-1 in Victim-5’s and Fraudulent Business-3’s names (“Fraudulent Accounts-7 and -8”). Bank records indicate that KHAN was the employee at Financial Institution-1 who verified the account-opening documents for both Fraudulent Accounts-7 and -8.

18. On or about September 21, 2022, an individual deposited into Fraudulent Account-7 a United States Treasury check made out to Entity Victim-3.

19. On or about September 22, 2022, LAZARRE sent Coconspirator-1 the login and password information to access online banking accounts held with Financial Institution-1 for Fraudulent Accounts-7 and -8.

Victim-6

20. On or about August 24, 2022, LAZARRE texted LEWIS: “are you down to open up a bizness account.” LEWIS responded in the affirmative, on

the condition that her personally identifiable information was not used to open the account.

21. On or about September 2, 2022, LAZARRE emailed KHAN documents concerning Entity Victim-4, including an Internal Revenue Service Employment Identification Number form. That same day, an account was opened at Financial Institution-1 in Entity Victim-4's name, using Victim-6's personally identifiable information ("Fraudulent Account-9"). Bank records indicate that KHAN was the employee at Financial Institution-1 who verified the account-opening documents. Also that day, LAZARRE texted KHAN: "Send login details and ac[count] number when u get a chance." KHAN subsequently replied with the details for a bank account at Financial Institution-1 that was in the name of Entity Victim-4, including the account number, a username, and a password.

22. On or about September 3, 2022, LAZARRE messaged LEWIS, via Telegram, that an "inny" at Financial Institution-1 had opened Fraudulent Account-9. This appears to be a reference to KHAN as an "inside man" at Financial Institution-1.

23. On or about September 6, 2022, LAZARRE messaged LEWIS with instructions regarding the details of Fraudulent Account-9:

LEWIS: Send me all the need to kno here.

LAZARRE: Sweet I used the second ssn. Say you make 250 k a year and your bizness name is [Entity Victim-4] It's a beauty salon [in Queens] . . .

LEWIS: I need to kno the addy or nah?

LAZARRE: [Sends a picture of a United States Treasury check made out to Entity Victim-4 within which the address for Entity Victim-4 is visible] . . . But your mailing address is [street address intentionally omitted] Bklyn ny 11225.

That same day, the above-referenced United States Treasury check was deposited into Fraudulent Account-9.

24. On or about September 9, 2022, LEWIS spoke with a representative of Financial Institution-1 at LAZARRE's direction to obtain a cash-out refinance loan¹ in Victim-6's name. During LEWIS's conversation with the representative, which appears to have occurred telephonically, she communicated with LAZARRE on Telegram regarding questions that she was receiving from the representative:

LEWIS: She asked how long I been there . . . Told her 2 and a half years

LAZARRE: Yep good answer . . . But. Business has been open since 2012.

LEWIS: Bro. These questions

. . .

LAZARRE: Improvise buddy

. . .

LEWIS: Might not have enough equity she said . . . What's the value ruffle around the area?

LAZARRE: 1.2

¹ A "cash-out refinance loan" is a mortgage refinancing option in which a new mortgage is taken out for a property in an amount exceeding the property's prior mortgage balance, and the difference in the values of the mortgages is paid out by the refinancing financial institution in a lump sum amount.

LEWIS: 1.2 million?

LAZARRE: Yep . . . I could've sworn I applied for a line of credit

LEWIS: No home equity?

LAZARRE: Shir that's wayyyy more money if she approved.

LEWIS: She already got one but it's ok

LAZARRE: Got one what . . . with [Financial Institution-1]?

LEWIS: Equity loan . . . But it's almost paid up.

25. On or about September 29, 2022, LAZARRE messaged STEIDE, via Telegram, regarding payments for STEIDE's and KHAN's participation in the conspiracy:

LAZARRE: So [KHAN is] leaving me on read...

STEIDE: Lol he not jacking y'all bro, he want everything to go through so no confusion going forward. He having fun with my other [associates] tbh lmao. He getting paid with them right now but I got him in check tho.

LAZARRE: I bet he is worried about crumbs lmaooo. We'll still getting paid f it. What time should I tell [Victim-6] chick to pull up Tom.

STEIDE: Na [the other associates] paying him 3k with no problems or [the other associates] giving us 30% when they pull out He just do what he do then they do what they do. No problems or nothing. I'll ask him.

. . .

STEIDE: We want to fuck with the ones that you did like [Entity Victim-4]

26. LAZARRE conferred with STEIDE regarding whether potential victims held accounts with Financial Institution-1. For example, on or about September 29, 2022, LAZARRE sent to STEIDE the social security numbers and

birth dates of potential victims and wrote: "Check them names and let's get the ball rolling meng." STEIDE responded: "Slow for those names. They both have relationships with [Financial Institution-1]. Personal and business relationships . . . And we will get the ball rolling but remember we still waiting for shit to cool off."

27. LAZARRE conferred with STEIDE to coordinate on a date on which another individual ("Coconspirator-2") could arrive at the branch of Financial Institution-1 where STEIDE and KHAN worked and impersonate Victim-6. STEIDE messaged LAZARRE on or about October 13, 2022: "Today a go . . . 2PM Make sure she's comes proper and ID and everything. Assistant manager here . . . For both CC for [Victim-6] is 3k but overall limit is usually 5k. Credit limit for both cards is 10K each. Cash advance 3k for personal and business each." That same day, LAZARRE messaged Coconspirator-2 on Telegram regarding the scheme:

Lazarre: Your name is [Victim-6]

Coconspirator-2: That's it? How do you even pronounce that?

Lazarre: He knows and has everhing lol . . . Oh yeah y mihht need this . . . the 231 SSN

Coconspirator-2: Just throwing me to the wolves...cool

Lazarre Lmaoooo not at all this is a inny not a random person jeez Louis... All your doing there is sitting there and he's going to be on the phone handling what he has to handle

Coconspirator-2: What I'm saying is I don't know nothing about this so I just go in and ask for him specifically

Lazarre It's sweet Just go sit down and say your here to see
[KHAN] bald Arab young dude. He said now is perfect.

All in violation of Title 18, United States Code, Section 1349.

COUNT TWO
(Bank Fraud)

28. Paragraphs One, Eleven, and Twelve of Count One are re-alleged and incorporated as if set forth fully herein.

29. On or about June 27 and 28, 2022, in the District of New Jersey and elsewhere, the defendant,

MARC LAZARRE,

did knowingly and intentionally execute and attempt to execute a scheme and artifice to defraud a financial institution, namely Financial Institution-4, whose deposits were insured by the Federal Deposit Insurance Corporation, and to obtain monies, funds, assets, and other property owned by, and under the custody and control of, Financial Institution-4, by means of materially false and fraudulent pretenses, representations, and promises.

In violation of Title 18, United States Code, Section 1344.

COUNTS THREE THROUGH FIVE
(Aggravated Identity Theft)

30. Paragraphs One, Four, Seven, and Eleven of Count One are re-alleged and incorporated as if set forth fully herein.

31. On or about the dates set forth below, in the District of New Jersey and elsewhere, the defendant,

MARC LAZARRE,

during and in relation to the felony violations of 18 U.S.C. §§ 1344 and 1349, as set forth in Counts One and Two of this Indictment, did knowingly transfer, possess and use, without lawful authority, the means of identification of other persons, knowing that the means of identification belonged to another actual person, as set forth in the Counts below:

Count	Date	Means of Identification and Description of Circumstances
Three	November 10, 2021	LAZARRE used the name and social security number of Victim-1 on an application for a bank account at a branch of Financial Institution-1, located in Fair Lawn, New Jersey.
Four	June 15, 2022	LAZARRE used the name, driver's license, and/or bank account information of Victim-2, at a branch of Financial Institution-2 located in Clifton, New Jersey, to obtain cash and two cashier's checks from a checking account that Victim-2 maintained with Financial Institution-2.
Five	June 27, 2022	LAZARRE used the name, social security number and/or driver's license of Victim-3 on an application for a bank account, at a branch of Financial Institution-4 located in Montclair, New Jersey

In violation of Title 18, United States Code, Section 1028A(a)(1).

FORFEITURE ALLEGATION AS TO COUNTS ONE AND TWO

Upon conviction of the offenses charged in Counts One and Two of this Indictment, the defendants,

**MARC LAZARRE,
FRITZGERALD STEIDE,
MOHAMMED KHAN, and
ANDREA LEWIS,**

shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(2)(A) any property constituting, and derived from, proceeds the respective defendants obtained directly and indirectly as the result of such offenses, and all property traceable to such property.

SUBSTITUTE ASSETS PROVISION

If any of the forfeitable property, as a result of any act or omission of the respective defendants:

- 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 shall be entitled, pursuant to Title 21, United States Code, Sections 853(p) and 982(b)(1), and Title 28, United States Code, Section 2461(d), to forfeiture of any other property of the defendants up to the value of the forfeitable property.

A TRUE BILL



FOREPERSON

Philip R. Sellinger
PHILIP R. SELLINGER
United States Attorney

CASE NUMBER: 23-_____

**United States District Court
District of New Jersey**

UNITED STATES OF AMERICA

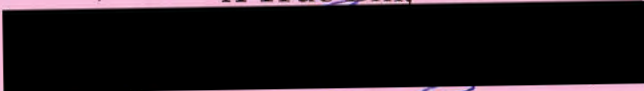
v.

**MARC LAZARRE,
FRITZGERALD STEIDE,
MOHAMMED KHAN, and
ANDREA LEWIS**

INDICTMENT FOR

**18 U.S.C. § 1349
18 U.S.C. § 1344(1)
18 U.S.C. § 1028A**

A True Bill,


Foreperson

**PHILIP R. SELLINGER
UNITED STATES ATTORNEY
FOR THE DISTRICT OF NEW JERSEY**

**MATTHEW J. BELGIOVINE
ASSISTANT U.S. ATTORNEY
TRENTON, NEW JERSEY
973.856.9179**
