

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

UNITED STATES OF AMERICA	:	Crim. No. 15-
	:	
v.	:	18 U.S.C. § 1349
	:	
LARONN MOULTRIE	:	

I N F O R M A T I O N

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

1. At all times relevant to this Information:

a. Defendant LARONN MOULTRIE was a resident of Newark, New Jersey.

b. Bank of America, Sovereign Bank (now Santander), and TD Bank (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.

2. From in or around October 2010 through in or around May 2012, in the District of New Jersey and elsewhere, defendant

LARONN MOULTRIE

did knowingly and intentionally conspire and agree with others to execute a scheme and artifice to defraud financial institutions, namely the Victim Banks, and to obtain monies, funds, credits, and securities owned by, and under the custody and control of the Victim Banks, by means of materially false and

fraudulent pretenses, representations, and promises, contrary to Title 18, United States Code, Section 1344.

Object of the Conspiracy

3. It was the object of the conspiracy that defendant LARONN MOULTRIE and others would cause fraudulent checks to be deposited into accounts at the Victim Banks and would withdraw funds from those accounts before the Victim Banks discovered that the checks were fraudulent.

Manner and Means of the Conspiracy

4. It was part of the conspiracy that defendant LARONN MOULTRIE and other unnamed co-conspirators (the "Co-conspirators") deposited and cashed and attempted to deposit and cash counterfeit checks at the Victim Banks in branches in New Jersey from in or around October 2010 through in or around May 2012.

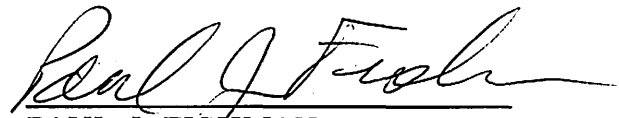
5. It was further part of the conspiracy that defendant LARONN MOULTRIE created the counterfeit checks using specialized software and printers.

6. It was further part of the conspiracy that defendant LARONN MOULTRIE acquired real bank account and routing numbers and used them to create the counterfeit checks.

7. It was further part of the conspiracy that the Co-conspirators converted the counterfeit checks into cash by depositing counterfeit checks into newly created bank accounts and withdrawing the deposited funds, in

cash, before the Victim Banks determined that the deposited checks were counterfeit.

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

A handwritten signature in black ink, appearing to read "Paul J. Fishman", written over a horizontal line.

PAUL J. FISHMAN
United States Attorney

CASE NUMBER: 15-

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INFORMATION FOR

18 U.S.C. § 1349

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