

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Criminal No. 16-
v. :
EARL CHAMPAGNE : 18 U.S.C. §§ 1709, 641 and 2

INFORMATION

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

Count 1
[18 U.S.C. § 1709 – Theft Of Mail By A Postal Employee]

The Defendant and Other Entities or Organizations

1. At all times relevant to this Information:
 - a. Defendant EARL CHAMPAGNE was a resident of Willingboro, New Jersey and was employed by the United States Postal Service as a mail carrier. The route on which defendant CHAMPAGNE delivered United States mail was located in Pennsauken, New Jersey.
 - b. Individual #1, who was a co-conspirator but not named as a defendant herein, was a resident of Merchantville, New Jersey.
 - c. Individual #2, who was a co-conspirator but not named as a defendant herein, was a resident of Maple Shade, New Jersey.
 - d. The Internal Revenue Service (“IRS”) was a constituent agency of the Treasury Department and part of the Executive Branch of the United States Government, responsible for administering and enforcing the tax

laws of the United States, collecting taxes owed to the Treasury of the United States, and providing refunds of taxes overpaid.

e. The United States Postal Service was an independent agency of the United States Government responsible for, among other things, providing postal service in the United States.

The Charge

2. From in or about April 2014 to in or about July 2014, in the District of New Jersey and elsewhere, defendant

EARL CHAMPAGNE

being a Postal Service officer or employee, did knowingly embezzle a letter, package, bag, mail and any article and thing contained therein entrusted to him and which came into his possession intended to be conveyed by mail, and carried and delivered by any carrier, agent and other person employed in any department of the Postal Service, namely, he stole, abstracted, removed and embezzled approximately 72 United States Treasury federal tax refund checks addressed to individuals on his postal mail route in Pennsauken, New Jersey.

In violation of Title 18, United States Code, Section 1709, and Title 18, United States Code, Section 2.

COUNT 2
[18 U.S.C. § 641 – Theft of Government Funds]

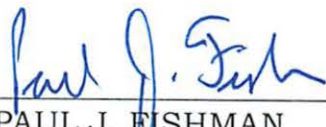
1. Paragraph 1 of Count 1 of this Information is incorporated as if set forth in full herein.

2. From in or about April 2014 to in or about July 2014, in the District of New Jersey and elsewhere, defendant

EARL CHAMPAGNE

did knowingly and intentionally embezzle, steal, purloin, and convert to his own use and the use of another, money, and things of value of the United States, namely United States Treasury Checks in the approximate amount of \$442,776.

In violation of Title 18, United States Code, Section 641, and Title 18, United States Code, Section 2.



PAUL J. FISHMAN
United States Attorney

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UNITED STATES OF AMERICA

v.

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INFORMATION FOR
18 U.S.C. § 1709
18 U.S.C. § 641
18 U.S.C. § 2

PAUL J. FISHMAN
U.S. ATTORNEY, NEWARK, NEW JERSEY

JASON M. RICHARDSON
ASSISTANT U.S. ATTORNEY
CAMDEN, NEW JERSEY
(856) 757-5026

USA-48AD8
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