

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

UNITED STATES OF AMERICA	:	Hon.
	:	
v.	:	Crim. No.
	:	
MALACHI JEFFERSON	:	18 U.S.C. § 1349

INFORMATION

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 MALACHI JEFFERSON (“JEFFERSON”) was a resident of the District of New Jersey and a former United States Postal Service (“USPS”) employee.
 - b. Co-Conspirator 1 was a resident of Monmouth County, New Jersey, and employed as a USPS sales/distribution clerk (“clerk”) at the U.S. Post Office in Keansburg, New Jersey (the “Keansburg PO”).
 - c. The Keansburg PO covered the Borough of Keansburg, as well as other neighboring New Jersey towns, including Keansburg Borough and a portion of Hazlet Township.
 - d. The Victim Banks, including Victim Bank-1 and Victim Bank-2, were federally insured “financial institutions,” as that term is defined in 18 U.S.C. § 20.

THE CONSPIRACY

2. From in or about April 2022 through in or about November 2022, in the District of New Jersey and elsewhere, defendant

MALACHI JEFFERSON

did knowingly and intentionally conspire and agree with others to execute a scheme and artifice to defraud financial institutions, as defined in Title 18, United States Code, Section 20, 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 such financial institutions, by means of materially false and fraudulent pretenses, representations, and promises, contrary to Title 18, United States Code, Section 1344.

GOAL OF THE CONSPIRACY

3. It was a goal of the conspiracy for JEFFERSON and his co-conspirators, including Co-Conspirator 1, to steal checks that were sent through the U.S. mail and passed through the Keansburg PO in order to enrich themselves by depositing or arranging for the deposit of the stolen checks to fraudulently obtain money from the Victim Banks.

MANNER AND MEANS OF THE CONSPIRACY

4. To carry out the conspiracy and to effect its unlawful object, JEFFERSON and his co-conspirators engaged in a variety of means and methods including, among others, those described below:

a. Co-Conspirator 1 used Co-Conspirator 1's position as a Keansburg PO clerk to steal checks from the mail at the Keansburg PO (the "Stolen Checks").

b. JEFFERSON recruited co-conspirators to deposit the Stolen Checks into their bank accounts (the "Fraud Accounts") and worked with certain co-conspirators to deposit stolen checks himself.

c. Once the Stolen Checks were deposited into the Fraud Accounts, the co-conspirators withdrew as much money as possible from the Fraud Accounts before the Victim Banks identified the checks as fraudulent and blocked further withdrawals from the Fraud Accounts.

d. JEFFERSON's co-conspirators sent a portion of the acquired funds to JEFFERSON through the use of cellular phone applications, including CashApp and Apple Cash. JEFFERSON and Co-Conspirator 1 also used these applications to transfer funds to each other.

OVERT ACTS

5. In furtherance of the conspiracy and to effect its unlawful object, JEFFERSON and his co-conspirators, including Co-Conspirator 1, committed the following overt acts, among others, in the District of New Jersey:

a. On or about May 9, 2022, in or around Cliffwood, New Jersey, JEFFERSON used a drive-through ATM maintained by Victim Bank-1 to deposit two Stolen Checks, worth approximately \$2,432 and \$7,722, into a Fraud Account maintained by a co-conspirator.

b. On or about May 31, 2022, in or around Newark, New Jersey, JEFFERSON and a co-conspirator used an ATM maintained by Victim Bank-2 to deposit two Stolen Checks, totaling approximately \$1,063.08, into a Fraud Account.

c. On or about November 7, 2022, in the District of New Jersey, Co-Conspirator 1 stored approximately 22 Stolen Checks inside Co-Conspirator 1's car, all of which appeared to have been routed through the Keansburg PO and named payees other than JEFFERSON and Co-Conspirator 1.

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

FORFEITURE ALLEGATION

1. The allegations contained in this Information are realleged here for the purpose of noticing forfeiture, pursuant to Title 18, United States Code, Section 982(a)(2)(A).

2. The United States hereby gives notice to the defendant that, upon conviction of the offense charged in this Information defendant

MALACHI JEFFERSON

shall forfeit to the United States, pursuant to 18 U.S.C. § 982(a)(2)(A), all property, real and personal, that constitutes and is derived from the proceeds the defendant obtained directly or indirectly as a result of the violation of Title 18, United States Code, Section 1349 alleged in this Information.

SUBSTITUTE ASSETS PROVISION

3. If by any act or omission of JEFFERSON, any of the property subject to forfeiture herein:

- 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 will be entitled to forfeiture of substitute property up to the value of the property described above, pursuant to Title 18, United States Code, Section 982(b) and Title 21, United States Code, Section 853(p).

Philip R. Sellinger/vk
PHILIP R. SELLINGER
United States Attorney