JB/2024R00572

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA v. DONOVAN BUNCH	Crim. No. 18 U.S.C. § 1349 18 U.S.C. § 922(g)(1)

INFORMATION

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

COUNT ONE
(Conspiracy to Commit Bank Fraud)

People and Entities

1. At all times relevant to this Information:

a. Defendant DONOVAN BUNCH was a resident of Sicklerville, New Jersey.

b. Tracy Felder-Carter, who was a co-conspirator but not named as a defendant herein and charged elsewhere, was a resident of Blackwood, New Jersey.

c. Dante Ford, who was a co-conspirator but not named as a defendant herein and charged elsewhere, was a resident of Pennsauken, New Jersey.

d. Quamell Keyes-Griffin, who was a co-conspirator but not named as a defendant herein and charged elsewhere, was a resident of Sicklerville, New Jersey.

e. The financial institutions described herein held accounts that were insured by either the Federal Deposit Insurance Act or National Credit Union Share Insurance Fund, Title 18, United States Code, Section 20.

2. From in or around June 2022 through in or around June 2024, in Camden, Gloucester, Cumberland, and Atlantic Counties, in the District of New Jersey and elsewhere, defendant

DONOVAN BUNCH

did knowingly and intentionally conspire and agree with Tracy Felder-Carter, Dante Ford, Quamell Keyes-Griffin, and others, known and unknown, to execute and attempt to execute a scheme and artifice to defraud a financial institution and to obtain any of the moneys, funds, credits, assets, securities, and other property owned by, and under the custody and control of, such financial institution, by means of false and fraudulent pretenses, representations, and promises, contrary to Title 18, United States Code, Section 1344.

The Object of the Conspiracy

3. It was the object of the conspiracy to obtain money from financial institutions by negotiating and causing to be negotiated altered and counterfeit versions of checks that had been stolen from the U.S. mail.

Manner and Means of the Conspiracy

4. It was part of the conspiracy that defendant DONOVAN BUNCH and other members of the conspiracy stole checks from the U.S. mail by unlawfully obtaining and using "arrow keys" to access blue U.S. mail collection boxes.

5. It was further part of the conspiracy that defendant DONOVAN BUNCH and other members of the conspiracy created counterfeit and altered versions of the stolen checks that increased the face value of the checks and changed the names of the payees of the checks to members of the conspiracy and other individuals who had been recruited by members of the conspiracy to provide their bank accounts to be used to negotiate checks for the conspiracy.

6. It was further part of the conspiracy that defendant DONOVAN BUNCH and

other members of the conspiracy deposited hundreds of the altered and counterfeit checks and attempted to withdraw the funds before the financial institutions learned that the checks were illegitimate. Defendant DONOVAN BUNCH's conduct and that of Tracy Felder-Carter, Dante Ford, Quamell Keyes-Griffin, and others, known and unknown, caused actual financial losses to the financial institutions.

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

COUNT TWO
(Possession of a Firearm by a Felon)

On or about July 7, 2023, in Camden County, in the District of New Jersey and elsewhere, defendant

DONOVAN BUNCH,

knowing that he had previously been convicted in a court of a crime punishable by a term of imprisonment exceeding one year, did knowingly possess a firearm and ammunition, namely a Glock Model 17 pistol, bearing serial number ACRP293, and approximately 14 rounds of ammunition, and the firearm was in and affecting commerce.

In violation of Title 18, United States Code, Section 922(g)(1).

FORFEITURE ALLEGATION AS TO COUNT ONE

Upon conviction of the offense in violation of 18 U.S.C. § 1349, set forth in Count One of this Information, the defendant, DONOVAN BUNCH, shall forfeit to the United States, pursuant to 18 U.S.C. § 982(a)(2)(A), any property constituting, or derived from, proceeds obtained directly or indirectly as a result of the offense charged in Count One of this Information.

FORFEITURE ALLEGATION AT TO COUNT TWO

Upon conviction of the offense in violation of 18 U.S.C. § 922(g)(1), set forth in Count Two of this Information, the defendant, DONOVAN BUNCH, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d)(l) and Title 28, United States Code, Section 2461(c), any firearm and ammunition involved in or used in the commission of the offense, including, but not limited to a Glock Model 17 pistol, bearing serial number ACRP293, and approximately 14 rounds of ammunition.

Substitute Assets Provision
(Applicable to All Forfeiture Allegations)

If any of the above-described forfeitable property, 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 person;

(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 subdivided without difficulty;

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. § 982(b), to seek forfeiture of any other property of said defendant up to the value of the above forfeitable property.

Alina Habba
ALINA HABBA
United States Attorney