UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon.

:

v. : Crim. No. 25-

RYAN L. TERRY : 18 U.S.C. § 1349

: 18 U.S.C. § 1344

: 18 U.S.C. § 2

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)

From in or about June 2023 through in or about December 2023, in Essex, Bergen, and Hudson Counties, in the District of New Jersey, and elsewhere, defendant

RYAN L. TERRY

knowingly and intentionally conspired with others to execute a scheme and artifice to defraud a financial institution 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 institution, by means of materially false and fraudulent pretenses, representations, and promises, contrary to Title 18, United States Code, Section 1344.

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

COUNT TWO

(Bank Fraud)

On or about July 21, 2023, in Hudson County, in the District of New Jersey, and elsewhere, defendant

RYAN L. TERRY

knowingly and intentionally executed, and attempted to execute, a scheme and artifice to defraud a financial institution 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 institution, by means of materially false and fraudulent pretenses, representations, and promises.

In violation of Title 18, United States Code, Section 1344 and Section 2.

ÁLINA HABBA

United States Attorney