JB/2025R00709

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA v. CHRISTOPHER HAYMAN	Crim. No. 26-13 (ESK) 18 U.S.C. § 1349

INFORMATION

The defendant having waived in open court prosecution by Indictment, the United States charges:

People and Entities

1. At all times relevant to this Information:

a. Defendant CHRISTOPHER HAYMAN was a resident of Philadelphia, Pennsylvania.

b. Tyree Holmes ("Holmes"), who was a co-conspirator but is not named as a defendant herein and is charged elsewhere, was a resident of Philadelphia, Pennsylvania.

c. Juawan Reed ("Reed"), who was a co-conspirator but is not named as a defendant herein and is charged elsewhere, was a resident of Sharon Hill, Pennsylvania, and was employed by the United States Postal Service and worked at the U.S. Postal Service Camden Carrier Annex in Camden, New Jersey.

d. Bank 1 and the other financial institutions described herein held accounts that were insured by either the Federal Deposit Insurance Act or National

Credit Union Share Insurance Fund and therefore were "financial institutions" as defined in Title 18, United States Code, Section 20.

2. From in or around December 2022 through on or about March 13, 2025, in Camden County, in the District of New Jersey and elsewhere, the defendant,

CHRISTOPHER HAYMAN,

did knowingly and intentionally conspire and agree with Tyree Holmes and others, known and unknown, to execute and attempt to execute a scheme and artifice to defraud financial institutions 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 institutions, 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 (a) altered and counterfeit versions of checks that had been stolen from the U.S. mail and (b) unaltered versions of the stolen checks by fraudulently impersonating the payees of such stolen checks.

Manner and Means of the Conspiracy

4. It was part of the conspiracy that Reed and other U.S. postal workers stole millions of dollars of checks from the U.S. mail.

5. It was further part of the conspiracy that Holmes advertised on a social media platform and sold to others some of the checks that were stolen by Reed and other U.S. postal workers.

6. It was further part of the conspiracy that Holmes obtained other checks

that were stolen by Reed that Holmes would cause to be negotiated fraudulently. As one example, on or about December 31, 2022, Holmes obtained from Reed a U.S. Treasury check in an amount of $686,541.88 that was payable to a business in Pennsauken, New Jersey ("Victim 1"). The check had been stolen by Reed in Camden, New Jersey, in late December 2022.

7. It was further part of the conspiracy that on or about February 3, 2023, defendant CHRISTOPHER HAYMAN falsely purported to be the CEO of Victim 1 in order to open a business bank account in the name of Victim 1 at Bank 1's branch in Philadelphia, Pennsylvania.

8. It was further part of the conspiracy that on or about February 7, 2023, the $686,541.88 Victim 1 check provided by Reed to Holmes was deposited into the account opened four days earlier by defendant CHRISTOPHER HAYMAN.

9. It was further part of the conspiracy that defendant CHRISTOPHER HAYMAN and Holmes withdrew, caused to be withdrawn, and attempted to withdraw the proceeds of the $686,541.88 Victim 1 check before their fraud was detected. Defendant HAYMAN and Holmes caused a substantial loss prior to Bank 1 detecting the fraud and closing the account opened by defendant HAYMAN.

10. It was further part of the conspiracy that on March 13, 2025, defendant CHRISTOPHER HAYMAN and Holmes possessed stolen U.S. Treasury checks payable in amounts totaling several hundred thousand dollars.

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

FORFEITURE ALLEGATION

As a result of committing the bank fraud conspiracy offense, in violation of 18 U.S.C. § 1349, charged in this Information, the defendant, CHRISTOPHER HAYMAN, 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.

Substitute Assets Provision

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.

ROBERT FRAZER
United States Attorney

Jeffrey Bender

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Assistant United States Attorney

Approved:
R. DAVID WALK, Jr.
Deputy United States Attorney

CASE NUMBER: 26-CR-13 (ESK)

United States District Court
District of New Jersey

UNITED STATES OF AMERICA

v.

CHRISTOPHER HAYMAN

INFORMATION FOR

18 U.S.C. § 1349

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