

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA

v.

TYREE HOLMES

Crim. No. 26-CR-270 (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 TYREE HOLMES was a resident of Philadelphia, Pennsylvania.
 - b. Christopher Hayman (“Hayman”), 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.

The Conspiracy

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,

TYREE HOLMES,

did knowingly and intentionally conspire and agree with Christopher Hayman, Juawan Reed, 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 defendant TYREE 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 members of the conspiracy created counterfeit and altered versions of the stolen checks that increased the face value of the checks.

7. It was further part of the conspiracy that members of the conspiracy changed the names of the payees on the checks to the names of the members of the conspiracy and the names of other individuals who had been recruited by members of the conspiracy to provide their bank accounts for negotiating checks for the conspiracy.

8. It was further part of the conspiracy that members of the conspiracy deposited and caused to be deposited hundreds of the altered and counterfeit checks into bank accounts that were held by individuals other than the intended payees.

9. It was further part of the conspiracy that, after members of the conspiracy deposited the altered and counterfeit checks, members of the conspiracy attempted to withdraw, and in many cases, actually did withdraw, the funds before the financial institutions learned that the checks were fraudulent. Defendant TYREE HOLMES's conduct and that of his co-conspirators caused actual financial losses to the financial institutions.

10. It was further part of the conspiracy that defendant TYREE 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.

11. It was further part of the conspiracy that on or about February 3, 2023, 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. Members of the conspiracy then used that same bank account to negotiate the \$686,541.88 check that Reed previously had stolen and provided to defendant TYREE HOLMES. Members of the conspiracy withdrew a substantial portion of the funds associated with the \$686,541.88 check before Bank 1 detected the fraud and closed the account.

12. It was further part of the conspiracy that on March 13, 2025, defendant TYREE HOLMES and Hayman 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, TYREE HOLMES, 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
Assistant United States Attorney

Approved:



R. DAVID WALK, Jr.
Deputy United States Attorney

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INFORMATION FOR

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