2022R00707/JB/SA/

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA v. JUAWAN REED	Crim. No. 26-108 (ESK) 18 U.S.C. § 1349 18 U.S.C. § 1028A 18 U.S.C. § 641 18 U.S.C. § 1708 18 U.S.C. § 1956(a)(1)(B)(i) 26 U.S.C. § 7206(1)

INFORMATION

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

COUNT 1
(Conspiracy to Commit Bank Fraud)

People and Entities

1. At all times relevant to this Information:

a. Defendant JUAWAN REED ("REED") was a resident of Sharon Hill, Pennsylvania. Defendant REED worked at the U.S. Postal Service Camden Carrier Annex in Camden, New Jersey.

b. Dante Ford ("Ford"), who was a co-conspirator but is not named as a defendant herein, and who is charged elsewhere, was a resident of Pennsauken, New Jersey, and Sewell, New Jersey.

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

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

e. 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 to in or about November 2023, in Camden County, in the District of New Jersey and elsewhere, the defendant,

JUAWAN REED,

did knowingly and intentionally conspire and agree with Dante Ford, 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 defendant JUAWAN REED stole checks from the U.S. mail, including but not limited to U.S. Treasury checks, while he worked at the U.S. Postal Service Camden Carrier Annex.

5. It was further part of the conspiracy that defendant JUAWAN REED photographed some of the checks that JUAWAN REED stole from the U.S. mail, with the intent that they would be shared on social media platforms and sold to other individuals who were not the intended payees.

6. It was further part of the conspiracy that Ford, Holmes, and others advertised on a social media platform and sold to others some of the checks that defendant JUAWAN REED previously had stolen from the U.S. mail.

7. 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.

8. 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 to be used to negotiate checks for the conspiracy.

9. 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.

10. 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 illegitimate. Defendant JUAWAN REED's conduct and that of his co-conspirators, known and unknown, caused actual financial losses to the financial institutions.

11. It was further part of the conspiracy that defendant JUAWAN REED stole other checks from the U.S. mail that he provided directly to Holmes and others for them to negotiate fraudulently. As one example, on or about December 31, 2022, defendant JUAWAN REED provided Holmes with a U.S. Treasury check in the amount of $686,541.88 that was payable to a business located in Pennsauken, New Jersey ("Victim 1"), which check had been stolen by defendant JUAWAN REED in Camden, New Jersey, in late December 2022.

12. 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 defendant JUAWAN REED previously had stolen and provided to 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.

13. It was further part of the conspiracy that defendant JUAWAN REED used stolen means of identification, including a stolen name and a stolen Social Security number belonging to another individual ("Victim 2"), to open financial accounts in Victim 2's name ("Victim 2 Accounts"). Defendant JUAWAN REED then directed his co-conspirators to pay him for previously providing them with stolen checks, by depositing funds into the Victim 2 Accounts that defendant REED, which accounts were controlled by defendant JUAWAN REED.

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

<u>COUNT 2</u>
(Aggravated Identity Theft)

1. The allegations contained in paragraphs 1 and 3 through 13 of Count 1 of this Information are hereby incorporated and realleged as if set forth fully herein.

2. From in or around December 2022 through in or about November 2023, in Camden County, in the District of New Jersey and elsewhere, the defendant,

JUAWAN REED,

did knowingly transfer, possess and use, without lawful authority, means of identification of another person, namely, the name and social security number of Victim 2, during and in relation to a felony violation of a provision enumerated in Title 18, United States Code, Section 1028A(c), that is, conspiracy to commit bank fraud, in violation of Title 18, United States Code, Section 1349, as set forth in Count 1, and theft of public money, in violation of Title 18, United States Code, Section 641, as set forth in Count 3, knowing that the means of identification belonged to another actual person.

In violation of Title 18, United States Code, Sections 1028A(a)(1) and (c)(5).

COUNT 3
(Theft of Public Money)

1. The allegations contained in paragraphs 1 and 3 through 13 of Count 1 of this Information are hereby incorporated and realleged as if set forth fully herein.

2. From in or around December 2022 through in or about November 2023, in Camden County, in the District of New Jersey and elsewhere, the defendant,

JUAWAN REED,

did willfully and knowingly steal and purloin U.S. Treasury checks, of a value exceeding $1,000, which were the goods and property of the United States.

In violation of Title 18, United States Code, Section 641.

COUNT 4
(Theft of U.S. Mail)

1. The allegations contained in paragraphs 1 and 3 through 13 of Count 1 of this Information are hereby incorporated and realleged as if set forth fully herein.

2. From in or around December 2022 through in or about November 2023, in Camden County, in the District of New Jersey and elsewhere, the defendant,

JUAWAN REED,

did knowingly steal and take mail from and out of a post office or station thereof, and did abstract and remove from such mail articles and things contained therein, namely checks made out to other persons.

In violation of Title 18, United States Code, Section 1708.

<u>COUNT 5</u>
(Money Laundering)

1. The allegations contained in paragraphs 1 and 3 through 13 of Count 1 of this Information are hereby incorporated and realleged as if set forth fully herein.

2. From in or around December 2022 through in or about November 2023, in Camden County, in the District of New Jersey and elsewhere, the defendant,

JUAWAN REED,

did knowingly conduct and attempt to conduct and attempt to conduct financial transactions affecting interstate and foreign commerce, which involved the proceeds of a specified unlawful activities, that is, the theft of public money, in violation of Title 18, United States Code, Section 641, charged in Count 3, and the theft of mail, in violation of Title 18, United States Code, Section 1708, as charged in Count 4, knowing that the transactions were designed in whole and in part to conceal and disguise, the nature, location, source, ownership, and control of the proceeds of said specified unlawful activities, and that while conducting and attempting to conduct such financial transactions, knew that the property involved in the financial transactions represented the proceeds of said unlawful activity.

In violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

COUNT 6
(Filing a False Federal Income Tax Return)

1. The allegations contained in paragraphs 1 and 3 through 13 of Count 1 of this Information are hereby incorporated and realleged as if set forth fully herein.

2. On or about April 15, 2024, in the District of New Jersey and elsewhere, the defendant,

JUAWAN REED,

did willfully make and subscribe and file and cause to be filed with the Internal Revenue Service a false Form 1040 U.S. Individual Income Tax Return for calendar year 2023, which was verified by a written declaration that it was made under the penalties of perjury, and which defendant JUAWAN REED did not believe to be true and correct as to every material matter reported therein, in that the tax return reported a total income of $44,271, whereas, as defendant JUAWAN REED knew, he had earned a total income in excess of $450,000 in connection with the offenses set forth in Counts 1, 3, and 4 of this Information.

In violation of Title 26, United States Code, Section 7206(1).

FORFEITURE ALLEGATION AS TO COUNT 1

As a result of committing the bank fraud conspiracy offense, in violation of 18 U.S.C. § 1349, the defendant, JUAWAN REED, 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 1 of this Information.

FORFEITURE ALLEGATION AS TO COUNTS 3 AND 4

As a result of committing the theft of public money offense, in violation of 18 U.S.C. § 641, and the mail theft offense, in violation of 18 U.S.C. § 1708, the defendant, JUAWAN REED, shall forfeit to the United States, pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), all of right, title, and interest in any property, real or personal, which constitutes or is derived from proceeds traceable to the offenses charged in Counts 3 and 4 of the this Information.

FORFEITURE ALLEGATION AS TO COUNT 5

As a result of committing the concealment money laundering offense, in violation of 18 U.S.C. § 1956(a)(1)(B)(i), the defendant, JUAWAN REED, shall forfeit to the United States, pursuant to 18 U.S.C. § 982(a)(1), all of right, title, and interest in any property, real or personal, involved in the offense charged in Count 5 of this Information, and any property traceable to such property.

Substitute Assets Provision
(Applicable to All Counts)

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.

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Approved:

Ronnell L. Wilson
Chief, Special Prosecutions Division

CASE NUMBER: 26-CR-108 (ESK)

United States District Court
District of New Jersey

UNITED STATES OF AMERICA

v.

JUAWAN REED

INFORMATION FOR

18 U.S.C. § 1349
18 U.S.C. § 1028A
18 U.S.C. § 641
18 U.S.C. § 1708
18 U.S.C. 1956(a)(1)(B)(i)
26 U.S.C. § 7206(1)

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