2026R00096/BDB

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA	:	Hon. Michael A. Shipp, U.S.D.J.
	:	
v.	:	Crim. No. 26-335-01 (MAS)
	:	
SHABAZZ ROUZARD	:	18 U.S.C. § 1349

INFORMATION

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

COUNT ONE
(Conspiracy to Commit Bank Fraud)

1. At all times relevant to this Information:

a. Defendant Shabazz Rouzard ("ROUZARD") was a resident of Mercer County, New Jersey.

b. Co-Conspirator Wayne Bessant ("Bessant") was a resident of Mercer County.

c. Payee-1 was retail store operating in Paterson, New Jersey.

d. Financial Institution-1 was a bank headquartered in New York, New York, and was a federally insured financial institution, as the term is defined in Title 18, United States Code, Section 20.

The Conspiracy

2. From in or around March 2023 through in or around June 2025, in Union, Middlesex, Mercer, and Burlington Counties in the District of New Jersey, and elsewhere, the defendant,

SHABAZZ ROUZARD,

knowingly and intentionally conspired and agreed with Bessant and others to execute and attempt to execute a scheme and artifice to defraud financial institutions, as defined in Title 18, United States Code, Section 20, whose deposits were insured by the Federal Deposit Insurance Corporation, and to obtain moneys, funds, credits, assets, securities, and other property owned by and under the custody and control of those financial institutions, by means of materially false and fraudulent pretenses, representations, and promises, contrary to Title 18, United States Code, Sections 1344(1) and (2).

Goal of the Conspiracy

3. It was the goal of the conspiracy for ROUZARD, Bessant, and others (the "Co-Conspirators") to enrich themselves by depositing stolen checks into fraudulent bank accounts using false or altered documentation and false misrepresentations.

Manner and Means of the Conspiracy

4. The manner and means by which the Co-Conspirators sought to accomplish the goal of the conspiracy included, among other things, the following:

a. First, Bessant received stolen commercial checks and stolen checks issued by the United States Department of the Treasury to payee businesses (the "Stolen Treasury Checks").

b. Second, the Co-Conspirators opened shell companies and acquired business-related documents in the names of the payees that were listed on the stolen checks, or in names similar to the payees' names, using a combination of three methods:

i. the *Hijack Method*: where the Co-Conspirators changed the registered agent on the payee's official records to one of the Co-Conspirators;

ii. the *Spoofing Method*: where the Co-Conspirators applied for business formation documents on behalf of fictitious companies using a name that was the same as, or similar to, that of the payee; and/or

iii. the *Alteration Method*: where the Co-Conspirators altered documents from the payee business, changing the payee's company name, registered agent, and/or addresses.

c. Third, fraudulent bank accounts in the names of the payees or in names similar to the payees' names were opened by the Co-Conspirators using those documents. For example, on or about August 1, 2023, the registered agent on Payee-1's official records was changed to ROUZARD. On or about August 2, 2023, ROUZARD opened a bank account ending in 0820 in the name of Payee-1 at a branch of at Financial Institution-1 ("Account 0820").

d. Fourth, after the fraudulent bank accounts were opened, the Co-Conspirators deposited the stolen checks in the fraudulent bank accounts and withdrew and/or transferred the proceeds to distribute them among the Co-Conspirators. For example, within days after opening Account 0820, ROUZARD deposited three Treasury checks payable to Payee-1 into Account 0820.

e. As a result, the Co-Conspirators obtained and attempted to obtain millions of dollars from the victim financial institutions.

f. During the conspiracy, ROUZARD facilitated the fraudulent deposits and attempted deposits of at least eight Stolen Treasury Checks, totaling approximately $461,635.49.

All in violation of Title 18, United States Code, Section 1349.

FORFEITURE ALLEGATION

1. Upon conviction of the conspiracy to commit bank fraud charged in this Information, the defendant,

SHABAZZ ROUZARD,

shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(2)(A), any property constituting, or derived from, proceeds the defendant obtained directly or indirectly as a result of such conspiracy.

SUBSTITUTE ASSETS PROVISION

2. If any of the property described above, as a result of any act or omission of the defendant, any of the above-described forfeitable property:

a. cannot be located upon the exercise of due diligence;

b. has been transferred to, or deposited with, a third party;

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 divided without difficulty,

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b), to seek forfeiture of any other property of the defendant up to the value of the above-described forfeitable property.

ROBERT FRAZER
United States Attorney

Benjamin D. Bleiberg
Assistant U.S. Attorney

Approved by:

Elaine K. Lou
Chief, Criminal Division

CASE NUMBER: 26-335-01 (MAS)

United States District Court
District of New Jersey

UNITED STATES OF AMERICA

v.

SHABAZZ ROUZARD

INFORMATION FOR

18 U.S.C. § 1349

ROBERT FRAZER
UNITED STATES ATTORNEY

BENJAMIN D. BLEIBERG
ASSISTANT U.S. ATTORNEY
NEWARK, NEW JERSEY
973-645-2700