

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA	:	Hon.
	:	
	:	Criminal No. 18-
	:	
v.	:	18 U.S.C. §§ 201(b)(1)(A) and (C)
	:	18 U.S.C. § 981(a)(1)(C)
	:	21 U.S.C. § 846
	:	21 U.S.C. § 853
GLENN BLACKSTONE	:	28 U.S.C. § 2461

I N F O R M A T I O N

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 Distribute Marijuana)

1. At all times relevant to Count One of this Information:
 - a. Defendant GLENN BLACKSTONE was a resident of Newark, New Jersey.
 - b. Co-Conspirator #1 (“CC-1”) was a resident of Sacramento, California.
2. From in or about October 2014 to in or about September 2017, in Essex County, defendant GLENN BLACKSTONE received parcels containing marijuana sent through the United States mail.
3. Defendant GLENN BLACKSTONE purchased the marijuana received in parcels sent through the mail from CC-1, who produced the marijuana in California and oversaw the shipments of the marijuana in parcels mailed from various locations in California and Nevada.

4. After receiving the parcels containing marijuana, defendant GLENN BLACKSTONE sold the marijuana to individuals in Newark.

5. From in or about October 2014 to in or about September 2017, in Essex County, in the District of New Jersey and elsewhere, defendant

GLENN BLACKSTONE

did knowingly and intentionally conspire and agree with CC-1 and others to distribute and possess with intent to distribute 100 kilograms or more of a mixture and substance, which contained a detectible amount of marijuana, a Schedule I controlled substance, contrary to Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B)(vii).

In violation of Title 21, United States Code, Section 846.

COUNT TWO
(Bribery)

1. Paragraphs 1a and 2 of Count One of this Information are realleged and incorporated as though fully set forth in this paragraph.
2. At all times relevant to Count Two of this Information:
 - a. Leonard Gresham (“Gresham”) was employed by the United States Postal Service (“USPS”) as a letter carrier.
 - b. Letter Carrier #1 was employed by the USPS. Both Gresham and Letter Carrier #1 were public officials within the meaning of 18 U.S.C. § 201(a)(1).
 - c. Defendant GLENN BLACKSTONE lived on a postal route located in Newark to which Gresham and Letter Carrier #1 were assigned.
 - d. Under the policies and procedures of the USPS for delivery of parcels sent by United States mail, letter carriers were required to deliver parcels to the address noted on the mailing label (the “recipient address”). If an individual resided or worked at the recipient address or was the addressee listed with the recipient address, the letter carrier was permitted to give the parcel to such individual at the recipient address. However, the letter carrier was not permitted to deliver the parcel to such individual at a location that was different from the recipient address. Moreover, while the addressee of a parcel was permitted to pick up the parcel at the officially designated windows of the post office station holding the parcel, the addressee could not be given parcels in non-designated pick-up areas of the post office.
3. From in or about October 2014 to in or about September 2017, defendant GLENN BLACKSTONE provided Gresham and Letter Carrier #1 a total of approximately \$12,400 in cash payments, in exchange for their personal deliveries of certain parcels containing marijuana sent through the United States mail to defendant GLENN BLACKSTONE.

4. It was part of the scheme that:
 - a. the parcels that defendant GLENN BLACKSTONE received by personal deliveries from Gresham and Letter Carrier #1 in exchange for cash were not addressed to the actual recipient and had fictitious return names and addresses on the mailing labels.
 - b. defendant GLENN BLACKSTONE contacted Gresham and Letter Carrier #1 (when Gresham was not available) on multiple occasions to request personal deliveries of certain parcels containing marijuana expected to arrive by United States mail at the USPS Springfield Station, which the Letter Carriers then removed from the stream of delivery while on duty and delivered to defendant GLENN BLACKSTONE at locations in Newark other than the recipient address. Each time that defendant GLENN BLACKSTONE received such a delivery, while in Newark, he gave Gresham or Letter Carrier #1 between approximately \$50 and \$100 in cash for the personal delivery of the parcels.

5. From in or about October 2014 to in or about September 2017, in Essex County, in the District of New Jersey, and elsewhere, defendant

GLENN BLACKSTONE

did, directly and indirectly, corruptly give, offer, and promise things of value, namely, United States currency, to Gresham and Letter Carrier #1, with intent to influence official acts and to induce Gresham and Letter Carrier #1 to do and omit to do acts in violation of their lawful duties.

In violation of Title 18, United States Code, Sections 201(b)(1)(A) and (C).

FORFEITURE ALLEGATION AS TO COUNT ONE

1. As a result of committing the controlled substance offense in violation of Title 21, United States Code, Section 846, as charged in Count One of this Information, defendant

GLENN BLACKSTONE

shall forfeit to the United States of America, pursuant to Title 21, United States Code, Section 853, any and all property constituting or derived from any proceeds obtained directly or indirectly as a result of the said offenses, and any and all property used or intended to be used in any manner or part to commit and to facilitate the commission of the offense alleged in Count One of this Information, including but not limited to, \$7,005.00 in United States currency.

FORFEITURE ALLEGATION AS TO COUNT TWO

2. As the result of committing the bribery offense alleged in Count Two of this Information, defendant

GLENN BLACKSTONE

shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), any and all property, real or personal, that constitutes or is derived from proceeds traceable to the violation of Title 18, United States Code, Section 201 alleged in Count Two of this Information.

SUBSTITUTE ASSETS PROVISION

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

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;

- (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), to seek forfeiture of any other property of defendant GLENN BLACKSTONE up to the value of the forfeitable property described in this forfeiture allegation.


CRAIG CARPENITO
United States Attorney

CASE NUMBER: 18-_____

**United States District Court
District of New Jersey**

UNITED STATES OF AMERICA

v.

GLENN BLACKSTONE

INFORMATION FOR

21 U.S.C. §§ 846 and 853
18 U.S.C. §§ 201(b)(1)(A) and (C)
18 U.S.C. § 981(a)(1)(C)
28 U.S.C. § 2461(c)

CRAIG CARPENITO

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