

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

UNITED STATES OF AMERICA	:	Hon.
	:	
	:	Criminal No. 18-
v.	:	
	:	18 U.S.C. §§ 201(b)(2)(A) and (C)
	:	18 U.S.C. § 371
	:	18 U.S.C. § 981(a)(1)(C)
FRED RIVERS	:	28 U.S.C. § 2461

INDICTMENT

The Grand Jury in and for the District of New Jersey, sitting at Newark, charges:

**COUNT 1
(Receiving Bribes)**

1. At all times relevant to Count 1 of this Indictment:
 - a. Defendant FRED RIVERS was employed by the United States Postal Service (“USPS”) as a mail carrier, and was a public official within the meaning of 18 U.S.C. § 201(a)(1). Defendant FRED RIVERS delivered mail on a postal route located in Newark, New Jersey, and was employed at the USPS Springfield Station in Newark.
 - b. Leonard Gresham (“GRESHAM”) also was employed by the USPS as a mail carrier at the USPS Springfield Station.
 - c. Glenn Blackstone (“BLACKSTONE”) was a resident on a postal route located in Newark to which mail carriers from the USPS Springfield Station were assigned.
 - d. Under the policies and procedures of the USPS for delivery of parcels sent by United States mail, mail 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 mail carrier was permitted to

give the parcel to such individual at the recipient address. Otherwise, the mail carrier was not permitted to deliver the parcel to such individual at a location that was different from the recipient address. 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.

2. Between in or about October 2016 and in or about September 2017, defendant FRED RIVERS received cash payments from BLACKSTONE in exchange for personally delivering certain parcels containing marijuana sent through the United States mail to BLACKSTONE, including at addresses in Newark other than the recipient address on the mailing label on the parcel.

3. It was part of the scheme that:

a. Defendant FRED RIVERS began making personal deliveries of the parcels containing marijuana to BLACKSTONE in exchange for cash after GRESHAM asked defendant RIVERS whether he was available to make the deliveries instead of him, as illustrated by the following text messages between defendant FRED RIVERS and GRESHAM from on or about October 5, 2016 to on or about October 6, 2016:

GRESHAM: "You want to make some money tomorrow sir"
RIVERS: "HELL YEAH! !!!!!!!"
[. . .]
GRESHAM: "Did everything go ok this morning sir"
RIVERS: "Yes sir. Thanks for that"
GRESHAM: "That what friends are for"

b. Defendant FRED RIVERS communicated with BLACKSTONE on multiple occasions concerning the personal deliveries to BLACKSTONE of certain parcels expected to arrive by United States mail at the USPS Springfield Station, which defendant FRED

RIVERS then removed from the stream of delivery while on duty and delivered to BLACKSTONE at locations in Newark other than the recipient address. Each time that defendant FRED RIVERS made such a delivery, he accepted a payment in cash of approximately \$100 from BLACKSTONE.

c. The parcels that defendant FRED RIVERS personally delivered in exchange for cash were not addressed to the actual recipient and had fictitious return names and addresses on the mailing labels.

d. Defendant FRED RIVERS usually delivered the parcels containing marijuana to BLACKSTONE at a USPS Springfield Station parking lot reserved for USPS employees (the “USPS Springfield Station employee parking lot”).

4. Between in or about October 2016 and in or about September 2017, in Essex County, in the District of New Jersey, and elsewhere, defendant

FRED RIVERS

being a public official, directly and indirectly, did corruptly demand, seek, receive, accept, and agree to receive and accept things of value, namely, cash, in return for being influenced in the performance of official acts and for being induced to do and omit to do acts in violation of his official duties.

In violation of Title 18, United States Code, Sections 201(b)(2)(A) and (C).

COUNT 2
(Conspiracy to Defraud the United States)

1. The allegations contained in paragraphs 1 through 3 of Count 1 of this Indictment are hereby realleged and incorporated by reference.

2. Between in or about October 2016 and in or about September 2017, in Essex County, in the District of New Jersey and elsewhere, defendant

FRED RIVERS

knowingly and intentionally did conspire and agree with others to defraud the United States by interfering with and obstructing the lawful function of the USPS: (a) to properly deliver only legal and permissible substances and materials through the United States mail; and (b) for USPS employees to receive only lawful compensation for such deliveries.

Goals of the Conspiracy

3. It was a goal of the conspiracy for defendant FRED RIVERS, BLACKSTONE, and GRESHAM to ensure that parcels containing marijuana sent illegally through the United States mail that BLACKSTONE expected to receive were intercepted from the stream of mail delivery and delivered to BLACKSTONE personally.

4. It was a further goal of the conspiracy for defendant FRED RIVERS and GRESHAM to receive cash in exchange for delivering the parcels containing marijuana to BLACKSTONE.

Means and Methods

5. It was part of the conspiracy that defendant FRED RIVERS sought out parcels containing marijuana that BLACKSTONE was expecting, removed them from the stream of mail delivery, and then personally delivered the parcels to BLACKSTONE when GRESHAM was unavailable to do so.

6. It was further part of the conspiracy that defendant FRED RIVERS usually delivered the parcels containing marijuana to BLACKSTONE at the USPS Springfield Station employee parking lot.

7. It was further part of the conspiracy that defendant FRED RIVERS communicated with BLACKSTONE by telephone to arrange the deliveries.

8. It was further part of the conspiracy that defendant FRED RIVERS received cash payments from BLACKSTONE when he delivered the parcels.

Overt Acts

9. In furtherance of the conspiracy and to effect its unlawful goals, the following overt acts, among others, were committed in the District of New Jersey:

a. On or about October 5, 2016, defendant FRED RIVERS replied: "HELL YEAH! !!!!!!!!" by text message to GRESHAM when defendant FRED RIVERS was asked whether he wanted to make some money.

b. On or about November 12, 2016, defendant FRED RIVERS delivered parcels containing marijuana to BLACKSTONE at the USPS Springfield Station employee parking lot.

c. On or about August 3, 2017, defendant FRED RIVERS delivered parcels containing marijuana to BLACKSTONE at the USPS Springfield Station employee parking lot.

d. On or about August 3, 2017, upon delivering the parcels containing marijuana to BLACKSTONE, defendant FRED RIVERS received cash from BLACKSTONE at the USPS Springfield Station employee parking lot.

In violation of Title 18, United States Code, Section 371.

FORFEITURE ALLEGATION

1. The allegations contained in Count 1 of this Indictment are hereby realleged and incorporated by reference for the purpose of noticing forfeiture pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

2. The United States hereby gives notice to defendant FRED RIVERS that, upon conviction of Count 1, in violation of Title 18, United States Code, Sections 201(b)(2)(A) and (C), charged in this Indictment, the United States will seek forfeiture, in accordance with Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), of any and all property, real and personal, that constituted and was derived from proceeds traceable to the commission of such offense.


3. If by any act or omission of the defendant FRED RIVERS, any of the property subject to forfeiture described above:

- 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;
- 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 28, United States Code, Section 2461(c), to seek forfeiture of any other property of defendant FRED RIVERS up to the value of the above-described forfeitable property.

A TRUE BILL

FOREPERSON


CRAIG CARPENITO
United States Attorney

CASE NUMBER: 18-_____

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

UNITED STATES OF AMERICA

v.

FRED RIVERS

INDICTMENT FOR

18 U.S.C. §§ 201(b)(2)(A) and (C)

18 U.S.C. § 371

18 U.S.C. § 981(a)(1)(C)

28 U.S.C. § 2461(c)

A True Bill.

Foreperson

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