

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon.
 :
 v. : Criminal No. 19-
 :
 : 18 U.S.C. §§ 1343, 1028A, and 1951(a)
 RAYMOND SCURA :
 : 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
(Wire Fraud)

From in or around July 2016 through on or about October 11,
2016, in the District of New Jersey, and elsewhere, the defendant,

RAYMOND SCURA,

did knowingly and intentionally devise a scheme and artifice to defraud
Merchant-1, and to obtain money and property, namely membership and credit
at Merchant-1, by means of materially false and fraudulent pretenses,
representations, and promises, and for the purpose of executing such scheme
and artifice to defraud, did transmit and cause to be transmitted by means of
wire communications in interstate and foreign commerce, certain writings,
signs, signals, pictures, and sounds, namely, an electronic wire transfer of
funds from Victim-1 to Merchant-1 that RAYMOND SCURA misappropriated
from Victim-1.

In violation of Title 18, United States Code, Section 1343.

COUNT TWO
(Aggravated Identity Theft)

On or about October 11, 2016, in Burlington County, in the District of New Jersey, and elsewhere, the defendant,

RAYMOND SCURA,

did knowingly transfer, possess, and use, without lawful authority, a means of identification of another individual, namely, the name and credit card account of Victim-1, during and in relation to a felony violation enumerated in Title 18, United States Code, Section 1028A(c), that is, wire fraud, in violation of Title 18, United States Code, Section 1343, as charged in Count One of this Information, knowing that the means of identification belonged to another actual person.

In violation of Title 18, United States Code, Section 1028A(a)(1).

COUNT THREE
(Hobbs Act Robbery)

On or about February 28, 2019, in Essex County, in the District of New Jersey, and elsewhere, the defendant,

RAYMOND SCURA,

did knowingly and willfully obstruct, delay, and affect, and attempt to obstruct, delay, and affect, commerce and the movement of articles and commodities in commerce, by robbery, and committed and threatened physical violence to persons and property in furtherance thereof.

In violation of Title 18, United States Code, Section 1951(a).

FORFEITURE ALLEGATION AS TO COUNT ONE

1. As a result of committing the offense charged in Count One this Information, the defendant,

RAYMOND SCURA,

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, all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of the said offense, and all property traceable thereto.

FORFEITURE ALLEGATION AS TO COUNT THREE

2. As a result of committing the Hobbs Act robbery offense alleged in Count Three of this Information,

RAYMOND SCURA,

shall forfeit to the United States, (i) pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461, any and all property constituting or derived from any proceeds obtained directly or indirectly as a result of the commission of such offense, and (ii) pursuant to 18 U.S.C. § 924 and 28 U.S.C. § 2461, any firearms and ammunition involved in or used in the commission of such offense.

SUBSTITUTE ASSETS PROVISION

3. If any of the property described above, 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 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 such defendant up to the value of the above forfeitable property.


CRAIG CARPENITO
United States Attorney

CASE NUMBER: _____

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

UNITED STATES OF AMERICA

v.

RAYMOND SCURA

INFORMATION FOR

18 U.S.C. §§ 1343, 1028A, and 1951(a)

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