

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

UNITED STATES OF AMERICA	:	Hon. Michael A. Hammer
	:	
v.	:	Mag. No. 20-10324
	:	
MARK GREGORY, JR.	:	CRIMINAL COMPLAINT

I, Lindsay Allcroft, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

SEE ATTACHMENT A

I further state that I am a Postal Inspector with the United States Postal Inspection Service and that this complaint is based on the following facts:

SEE ATTACHMENT B

continued on the attached page and made a part hereof.



Lindsay Allcroft, Postal Inspector
United States Postal Inspection Service

Postal Inspector Lindsay Allcroft attested to this Affidavit by telephone pursuant to F.R.C.P. 4.1(b)(2)(A) on

10/14, 2020
at Newark, New Jersey

HONORABLE MICHAEL A. HAMMER
UNITED STATES MAGISTRATE JUDGE



Signature of Judicial Officer

ATTACHMENT A

**COUNT ONE
(Theft of Government Property)**

On or about March 25, 2019, in Essex County, in the District of New Jersey and elsewhere, defendant

MARK GREGORY, JR.

did knowingly and intentionally embezzle, steal, purloin, and convert to his own use money of the United States, namely a United States Treasury check in the approximate amount of \$988.00.

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

**COUNT TWO
(Theft of Government Property)**

On or about July 3, 2019, in Essex County, in the District of New Jersey and elsewhere, defendant

MARK GREGORY, JR.

did knowingly and intentionally embezzle, steal, purloin, and convert to his own use money and things of value, namely a check in the approximate amount of \$41.97 and cash totaling approximately \$7,578.00 in the possession of the United States Postal Service.

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

COUNT THREE
(Bank Fraud)

From at least in or about May 2019 through in or about July 2019, in Essex County, in the District of New Jersey and elsewhere, defendant

MARK GREGORY, JR.

did knowingly and intentionally devise and attempt to devise a scheme and artifice to defraud financial institutions, as defined in Title 18, United States Code, Section 20, whose deposits were insured by the FDIC, and to obtain monies, funds, assets, and other property owned by and under the custody and control of such financial institutions, by means of materially false and fraudulent pretenses, representations, and promises.

In violation of Title 18, United States Code, Section 1344.

ATTACHMENT B

I, Lindsay Allcroft, a Postal Inspector with the United States Postal Inspection Service, having personally participated in an investigation of the conduct of defendant MARK GREGORY, JR., and having spoken with other law enforcement officers and individuals, have knowledge of the following facts. Because this Complaint is submitted for the limited purpose of establishing probable cause, I have not included all facts known to me concerning this investigation. The contents of documents and the statements and conversations of individuals referenced below are provided in substance and in part, unless otherwise indicated.

Defendant and Entities

1. At all times relevant to this Criminal Complaint:

a. Defendant MARK GREGORY, JR. ("defendant GREGORY") was a resident of Newark, New Jersey and employed as a contract custodian by a subcontractor providing services to the U.S. Postal Service ("USPS") in Maplewood, New Jersey, 07040.

b. The USPS operated a post office located at 195 Maplewood Avenue in Maplewood, New Jersey (the "Maplewood Post Office").

c. The U.S. Treasury paid tax refunds to taxpayers in the form of checks, which were mailed to taxpayers via the United States mail, unless the taxpayers designated bank accounts for the receipt of tax refunds by electronic deposit.

d. Bank-1 was a financial institution with headquarters in South Dakota.

e. Bank-2 was a financial institution with headquarters in Delaware.

f. Bank-3 was a financial institution with headquarters in North Carolina.

g. Bank-4 was a financial institution with headquarters in Texas.

h. Bank-5 was a financial institution with headquarters in Ohio.

i. Bank-6 was a financial institution with headquarters in New Jersey.

j. Bank-1 through Bank-6 (collectively the "Victim Banks") (1) were "financial institutions" as that term is defined in Title 18, United States Code, Section 20, offering, among other things, checking and savings accounts to customers; (2) had deposits insured by the Federal Deposit Insurance Corporation (FDIC); (3) had branches in New Jersey, with the exception of Bank-4.

Theft and Fraud Scheme

2. In or about June 2019, a customer reported to a window clerk at the Maplewood Post Office that an individual using the name “Mark Gregory” had deposited two checks written by the customer from an account at Bank-1 (the “Bank-1 Checks”). The customer had made the Bank-1 Checks payable to specified corporate entities—not “Mark Gregory”—and placed them into the stream of mail at the Maplewood Post Office. The Bank-1 Checks had both been altered with the name “Mark Gregory” forged on the pay-to line of the check before being fraudulently endorsed and deposited. The Bank-1 Checks totaled approximately \$1,648.04; one check was for approximately \$698.13 and the other was for approximately \$949.91.

3. On or about July 5, 2019, a bag holding the Maplewood Post Office’s payments from customers, including a check in the approximate amount of \$41.97 and cash totaling approximately \$7,578.00, was discovered to be missing from a safe at the Maplewood Post Office. Further investigation revealed that the missing remittance bag had been prepared on or about July 2, 2019 and went missing on or about July 3, 2019. Defendant GREGORY was working at the Maplewood Post Office on or about July 3, 2019.

4. On or about July 10, 2019, law enforcement interviewed defendant GREGORY at the Maplewood Post Office. During the interview, and in a written statement, defendant GREGORY admitted to stealing the Bank-1 Checks and the remittance bag and its contents from the Maplewood Post Office. He spent the cash from the remittance bag and deposited the Bank-1 Checks into a bank account in his name (“Gregory Account 1”) in New Jersey.

5. Further investigation, including a review of copies of checks fraudulently deposited by GREGORY, revealed that between on or about March 25, 2019 and on or about July 17, 2019, defendant GREGORY stole and fraudulently endorsed and deposited a total of at least 14 checks made out to individuals and entities other than himself, including the Bank-1 Checks, into Gregory Account 1 and a second bank account in his name (“Gregory Account 2”) in New Jersey:

Victim	Approximate Posting Date	Approximate Check Amount	Receiving Account
U.S Treasury	3/25/2019	\$988.00	Gregory Account 1
Bank-2	5/15/2019	\$653.51	Gregory Account 1
Bank-3	5/23/2019	\$80.00	Gregory Account 1
Bank-4	5/23/2019	\$60.00	Gregory Account 1
Bank-1	6/3/2019	\$698.13	Gregory Account 1
Bank-5	6/3/2019	\$46.50	Gregory Account 1
Bank-1	6/10/2019	\$949.91	Gregory Account 1
Bank-2	6/10/2019	\$603.56	Gregory Account 1
Bank-3	6/13/2019	\$787.17	Gregory Account 1
Bank-3	6/13/2019	\$578.78	Gregory Account 1
Bank-6	7/15/2019	\$128.40	Gregory Account 2
Bank-5	7/15/2019	\$746.16	Gregory Account 2
Bank-5	7/17/2019	\$1,000.00	Gregory Account 2

6. As a result of defendant GREGORY's theft and fraud scheme, the USPS lost approximately \$7,619.97, the U.S. Treasury lost approximately \$988.00, and the Victim Banks lost approximately \$6,332.12, for a total loss to the victims of approximately \$14,940.09.