

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA	:	Hon.
	:	
v.	:	Crim. No.
	:	
MICHELE DEARAUJO	:	18 U.S.C. § 1708
	:	

I N F O R M A T I O N

The defendant having waived in open court prosecution by Indictment, the Acting United States Attorney for the District of New Jersey charges:

COUNT ONE
(Possession of Stolen Mail)

On or about November 20, 2020, in Hunterdon County, in the District of New Jersey and elsewhere, the defendant,

MICHELE DEARAUJO,

did unlawfully have in her possession any letter, postal card, package, bag, and mail, and an article contained therein ("mail matter"), which had been stolen, taken, embezzled, and abstracted from a mail receptacle, which was an authorized depository for mail matter, knowing said mail matter to have been stolen, taken, embezzled, and abstracted from an authorized depository for mail matter.

In violation of Title 18, United States Code, Section 1708.

COUNT TWO
(Possession of Stolen Mail)

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

MICHELE DEARAUJO,

did unlawfully have in her possession any letter, postal card, package, bag, and mail, and an article contained therein ("mail matter"), which had been stolen, taken, embezzled, and abstracted from a mail receptacle, which was an authorized depository for mail matter, knowing said mail matter to have been stolen, taken, embezzled, and abstracted from an authorized depository for mail matter.

In violation of Title 18, United States Code, Section 1708.

Forfeiture Allegations
(Applicable to Count One and Count Two)

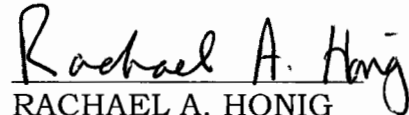
1. Upon conviction of the offenses in violation of 18 U.S.C. § 1708, possession of stolen mail, as charged in Counts One and Two of this Information, defendant Michele Dearaujo shall forfeit to the United States, pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), all property, real and personal, the defendant obtained that constitutes or is derived from proceeds traceable to the commission of the said offenses.

Substitute Assets Provision
(Applicable to Count One and Count Two)

2. If any of the above-described forfeitable property, 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 21 U.S.C. § 853(p), as incorporated by 28 U.S.C. § 2461(c), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.


RACHAEL A. HONIG
Acting United States Attorney

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UNITED STATES OF AMERICA

v.

MICHELE DEARAUJO

INFORMATION FOR

18 U.S.C. § 1708

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