

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon.
 :
 v. : Crim. No. 21-
 :
 ALEXANDER VARICE : 18 U.S.C. § 1349

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
(Conspiracy to Commit Bank Fraud)

Background

1. At all times relevant to this Information:
 - a. Defendant Alexander Varice (“VARICE”) was a resident of East Orange, Hillside, and West Orange, New Jersey.
 - b. The following were “financial institutions,” as that term is defined in 18 U.S.C. § 20; “Victim Bank 1,” a financial institution headquartered in McLean, Virginia, and “Victim Bank 2,” a financial institution headquartered in Charlotte, North Carolina (collectively, “Victim Banks”).

The Conspiracy

2. From at least as early as in and around August 2018 through in and around January 2020, in the District of New Jersey, and elsewhere, defendant

ALEXANDER VARICE

knowingly and intentionally conspired and agreed with others to execute a scheme and artifice to defraud financial institutions, as defined in Title 18,

United States Code, Section 20, namely Victim Bank 1 and Victim Bank 2, whose deposits were insured by the Federal Deposit Insurance Corporation, and to obtain money, funds, assets, and other property owned by and under the custody and control of those financial institutions, by means of materially false and fraudulent pretenses, representations, and promises, contrary to Title 18, United States Code, Section 1344.

Goal of the Conspiracy

3. It was the goal of the conspiracy for VARICE and others (the “Coconspirators”) to enrich themselves and others by using stolen credit cards and checks to obtain money from the Victim Banks.

Manner and Means of the Conspiracy

4. It was part of the conspiracy that:

a. From at least as early as in and around August 2018 through in and around January 2020, VARICE and the Coconspirators engaged in a scheme to use credit cards and checks that were stolen from United States Postal Service facilities to fraudulently withdraw money from the Victim Banks and to make purchases to benefit themselves, leaving the Victim Banks to bear the losses of the scheme.

b. The credit cards, issued and shipped by Victim Bank 1 from Virginia to New Jersey, were stolen from a third-party sorting facility used by the United States Postal Service in Pine Brook, New Jersey, as well as from a post office in Warren, New Jersey.

c. VARICE and the Coconspirators placed calls to Victim Bank 1 to either activate the stolen cards or check the account balance on those cards.

d. VARICE and the Coconspirators used the stolen credit cards to make unauthorized purchases at various retail stores and to withdraw cash from Victim Bank 1 automated teller machines (“ATMs”) in New Jersey and elsewhere.

i. For example, on or about July 15, 2019, VARICE used a stolen Victim Bank 1 credit card to withdraw \$200 from a Victim Bank 1 ATM located in Newark, New Jersey.

e. Personal and cashier’s checks were stolen from various New Jersey-based post office facilities. VARICE and the Coconspirators used these stolen checks to fraudulently withdraw money from accounts at Victim Bank 2 that did not belong to them.

f. The Coconspirators altered the dates, payees, and/or amounts of the stolen checks before depositing them so that they could manually enter the amounts that they wanted to fraudulently withdraw from a Victim Bank 2 ATM.

i. For example, on or about August 28, 2018, VARICE and a Coconspirator deposited five blank checks into a third-party’s account at a Victim Bank 2 ATM located in Milltown, New Jersey. VARICE manually entered a deposit amount of \$3,200. On or about that same date and following these deposits, VARICE and Coconspirators withdrew \$1,591.70 from this account in

the form of cash withdrawals from various Victim Bank 2 ATMs and debit transactions.

5. As a result of the foregoing conduct, the Victim Banks suffered total losses of at least approximately \$250,000.

All in violation of Title 18, United States Code, Section 1349.

FORFEITURE ALLEGATION

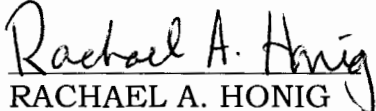
1. The allegations contained in Count One of this Information are hereby realleged and incorporated by reference for the purpose of alleging forfeiture, pursuant to Title 18, United States Code, Section 982(a)(2).

2. The United States hereby gives notice to defendant VARICE that, upon his conviction of the offense alleged in Count One of this Information, the government will seek forfeiture in accordance with Title 18, United States Code, Section 982(a)(2), which requires any person convicted of such an offense to forfeit any property, real or personal, which constitutes or is derived from proceeds obtained directly or indirectly as a result of such offense.

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

- 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 VARICE up to the value of the forfeitable property described above.


RACHAEL A. HONIG
Acting United States Attorney

CASE NUMBER: _____

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v.

ALEXANDER VARICE

INFORMATION FOR

18 U.S.C. § 1349

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