

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

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

**INFORMATION**

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 Dashawn Duncan (“DUNCAN”) was a resident of Newark, New Jersey.
  - b. “Financial institution,” as that term is defined in 18 U.S.C. § 20 means “Victim Bank,” a financial institution headquartered in McLean, Virginia.

**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

DASHAWN DUNCAN

knowingly and intentionally conspired and agreed with others to execute a scheme and artifice to defraud a financial institution, as defined in Title 18, United States Code, Section 20, namely Victim Bank, 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 the financial institution, 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 DUNCAN and others (the “Coconspirators”) to enrich themselves and others by using stolen credit cards to obtain money from Victim Bank or to purchase merchandise ultimately paid for by Victim Bank.

**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, DUNCAN and the Coconspirators engaged in a scheme to use credit cards that were stolen from United States Postal Service facilities to fraudulently withdraw money from the Victim Bank and to make purchases to benefit themselves, leaving the Victim Bank to bear the losses of the scheme.

b. The credit cards, issued and shipped by Victim Bank 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. DUNCAN and the Coconspirators placed calls to Victim Bank to either activate the stolen cards or check the account balance on those cards.

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

i. For example, on or about May 3, 2019, DUNCAN used a stolen Victim Bank credit card to purchase merchandise in the amount of \$1,363.68 from a known retail store located in Paramus, New Jersey.

ii. For example, on or about May 13, 2019, DUNCAN used a stolen Victim Bank credit card to purchase merchandise in the amount of \$1,331.75 from a known retail store located in Short Hills, New Jersey.

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

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

### **FORFEITURE ALLEGATION**

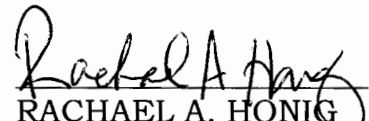
1. The allegations contained in Count One of this Information are hereby realleged and incorporated by reference for the purpose of alleging forfeiture, pursuant to Title 18, United States Code, Section 982(a)(2).

2. The United States hereby gives notice to defendant DUNCAN 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 DUNCAN:

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

  
RACHAEL A. HONIG  
Acting United States Attorney

CASE NUMBER: \_\_\_\_\_

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**United States District Court  
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**UNITED STATES OF AMERICA**

**v.**

**DASHAWN DUNCAN**

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**INFORMATION FOR**

**18 U.S.C. § 1349**

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RACHAEL A. HONIG  
ACTING UNITED STATES ATTORNEY  
FOR THE DISTRICT OF NEW JERSEY

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