

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA	:	Hon.
	:	
v.	:	Crim. No.
	:	
BRANDO MANCEBO	:	18 U.S.C. §§ 1708 and 2
	:	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 ONE
(Mail Theft)

In or around December 2018, in the District of New Jersey and elsewhere, the defendant,

BRANDO MANCEBO,

did knowingly steal, take, and abstract, and by fraud and deception did obtain, and did attempt so to obtain, from and out of a mail, post office, and station thereof, letter box, mail receptacle, and mail route and other authorized depository for mail matter a letter, postal card, package, bag, and mail, and did abstract and remove from such letter, package, bag, and mail, an article and thing contained therein, and did secrete, embezzle, and destroy such letter, postal card, package, bag, and mail, and an article and thing contained therein.

In violation of Title 18, United States Code, Sections 1708 and 2.

COUNT TWO
(Conspiracy to Commit Bank Fraud)

From in or around May 2018 through in or around March 2019, in the District of New Jersey and elsewhere, the defendant,

BRANDO MANCEBO,

knowingly and intentionally conspired and agreed with others to commit bank fraud, specifically to execute and attempt to execute a scheme and artifice to defraud a financial institution, the deposits of which were then insured by the Federal Deposit Insurance Corporation, and to obtain the money, funds, or other property owned by, and under the custody and control of, such financial institution, by means of materially false or fraudulent pretenses, representations, or promises, with the intent to deceive such financial institution, contrary to Title 18, United States Code, Section 1344.

In violation of Title 18, United States Code, Section 1349.

FORFEITURE ALLEGATIONS

Forfeiture Allegations as to Count One

1. Upon conviction of the possession of stolen mail offense in violation of Title 18, United States Code, Sections 1708 and 2, as charged in Count One of this Information, the defendant,

BRANDO MANCEBO,

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(c), all property, real and personal, the defendant obtained that constitutes or is derived from proceeds traceable to the commission of the said offense.

Forfeiture Allegation as to Count Two

2. Upon conviction of the conspiracy to commit bank fraud offense in violation of Title 18, United States Code, Section 1349, as charged in Count Two of this Information, the defendant,

BRANDO MANCEBO,

shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(2), any and all property constituting or derived from proceeds obtained directly or indirectly as a result of such offense. The property to be forfeited includes, but is not limited to, the value of proceeds equal to \$23,206.26.

SUBSTITUTE ASSETS PROVISION
(Applicable to All Forfeiture Allegations)

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

- (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 such defendant up to the value of the above-described forfeitable property.


RACHAEL A. HONIG
Acting United States Attorney

CASE NUMBER: _____

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

UNITED STATES OF AMERICA

v.

BRANDO MANCEBO

INFORMATION FOR

18 U.S.C. § 1708

18 U.S.C. § 1349

18 U.S.C. § 2

RACHAEL A. HONIG
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FOR THE DISTRICT OF NEW JERSEY

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ASSISTANT U.S. ATTORNEY
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