

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

UNITED STATES OF AMERICA	:	Hon.
	:	
	:	Criminal No. 21-
v.	:	
	:	18 U.S.C. § 1349
	:	
TASHON RAGAN	:	
a/k/a "Ta"	:	

**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:

**Background**

1. At times material to this Information:
  - a. Defendant TASHON RAGAN ("RAGAN") was a resident of Hillside, New Jersey, and was known as "Ta."
  - b. Co-Conspirator 1 ("CC-1") was a resident of Newark, New Jersey, and employed as a clerk at the United States Post Office in Summit, New Jersey ("the Summit PO").
  - c. Co-Conspirator 2 ("CC-2") was a resident of Irvington, New Jersey.
  - d. Co-Conspirator 3 ("CC-3") was a resident of Hillside, New Jersey.

- e. Ayanah Sade McCall (“McCall”) was employed as a clerk at the Summit PO.
- f. Co-Conspirator 4 (“CC-4”) was a resident of Union, New Jersey.
- g. Student 1 was a student at a high school in New Jersey (“NJHS”).
- h. The victim financial institutions, including Bank 1 and Bank 2, were “financial institutions” whose deposits were insured by the Federal Deposit Insurance Corporation (“FDIC”) or whose accounts were insured by the National Credit Union Insurance Fund (“NCUIF”).
- i. The Coronavirus Aid, Relief, and Economic Security Act authorized economic impact payment (“EIP”) checks issued by the U.S. Department of Treasury to certain eligible taxpayers of \$1,200 for individuals, \$2,400 for married couples filing jointly, and up to \$500 for each qualifying child.

### **The Conspiracy**

2. From in or about February 2019 to in or about May 2020, in Essex and Union Counties, in the District of New Jersey and elsewhere, defendant

### **TASHON RAGAN**

knowingly and intentionally did conspire and agree with CC-1, CC-2, CC-3, McCall, CC-4, and others (collectively, the “Co-Conspirators”) to execute 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

whose accounts were insured by the NCUIF, 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, contrary to Title 18, United States Code, Section 1344.

### **Goal of the Conspiracy**

3. It was the goal of the conspiracy for RAGAN and the Co-Conspirators to enrich themselves by fraudulently obtaining money from victim financial institutions by, among other things, depositing counterfeit checks and checks stolen from the United States Postal Service (“USPS”) into bank accounts at victim financial institutions and withdrawing funds from those accounts before the victim financial institutions identified the fraudulent checks and blocked further withdrawals.

### **Manner and Means of the Conspiracy**

4. It was part of the conspiracy that:
- a. RAGAN and the Co-Conspirators arranged for USPS employees, including CC-1 and McCall, to steal credit cards and blank checkbooks from the United States mail in exchange for cash payments.
  - b. CC-1 and McCall removed envelopes and packages containing credit cards and blank checkbooks from financial institutions that were in the mail at the Summit PO, which were intended to be delivered to residents of Summit and New Providence, New Jersey.

c. USPS employees, including CC-1 and McCall, provided stolen checkbooks and credit cards to RAGAN and the Co-Conspirators (the “Stolen Checks”).

d. RAGAN and the Co-Conspirators paid approximately \$100 for each stolen checkbook or credit card they received from CC-1 and McCall.

e. RAGAN and the Co-Conspirators solicited accountholders at various financial institutions, including NJHS students (the “Complicit Accountholders”), to provide their banking information to the Co-Conspirators in exchange for the promise of cash.

f. RAGAN and the Co-Conspirators fraudulently negotiated and endorsed the Stolen Checks in the names of the Complicit Accountholders, including Student 1 and CC-4, and deposited and attempted to deposit the Stolen Checks into the accounts of the Complicit Accountholders (the “Fraud Accounts”).

g. RAGAN and the Co-Conspirators created counterfeit checks, including counterfeit EIP checks, and deposited and attempted to deposit the counterfeit checks into the Fraud Accounts.

h. After depositing the Stolen Checks and counterfeit checks into the Fraud Accounts, RAGAN and the Co-Conspirators withdrew as much money as possible from the Fraud Accounts via automated teller machines (“ATMs”) before the victim financial institutions identified the checks as fraudulent and blocked further withdrawals from the Fraud Accounts.

i. For example, on or about October 23, 2019, using personal banking information obtained from CC-4 for CC-4's Bank 1 accounts, RAGAN, CC-2, and others deposited at ATMs in New Jersey four fraudulent checks totaling approximately \$8,279, including two checks stolen from the Summit PO, into the Bank 1 accounts of CC-4. On or about October 23, 2019, RAGAN and CC-2 withdrew a total of approximately \$900 at an ATM in New Jersey from one of CC-4's Bank 1 accounts before Bank 1 identified the checks as fraudulent and blocked further withdrawals from the account.

j. On or about October 29, 2019, RAGAN recruited Student 1 over a social media application to provide personal banking information regarding Student 1's Bank 1 account in exchange for the promise of cash. On or about October 30, 2019, using the banking information Student 1 provided, RAGAN caused a check stolen from the Summit PO in the approximate amount of \$399 to be deposited at an ATM in New Jersey into Student 1's Bank 1 account. RAGAN subsequently caused two withdrawals at ATMs in New Jersey from Student 1's Bank 1 account in the approximate amounts of \$500 and \$220, respectively, before Bank 1 identified the check as fraudulent and blocked further withdrawals from the account. The amount of the withdrawals exceeded the amount of the fraudulent check deposit.

k. On or about May 1, 2020, Student 1 provided RAGAN with banking information for an account at Bank 2 in Student 1's name. On or about May 4, 2020, RAGAN deposited a counterfeit EIP check into Student 1's Bank 2 account at an ATM in New Jersey in the approximate amount of

\$3,890. On or about May 9, 2020, RAGAN and CC-3, deposited approximately four counterfeit EIP checks and four checks stolen from the Summit PO into Student 1's Bank 2 account at an ATM in New Jersey in the total approximate amount of \$7,596. RAGAN caused approximately \$183 to be withdrawn from Student 1's Bank 2 bank account at an ATM in New Jersey before the checks were identified by Bank 2 as fraudulent and further withdrawals were blocked from the account.

1. Using the manner and means described herein, the Co-Conspirators obtained and attempted to obtain hundreds of thousands of dollars from the victim financial institutions.

In violation of Title 18, United States Code, Sections 1349 and 2.

### **FORFEITURE ALLEGATION**

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

2. The United States hereby gives notice to defendant

#### **TASHON RAGAN**

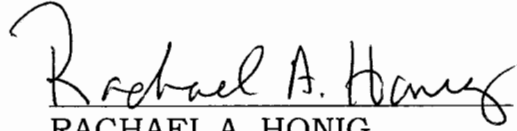
that, upon conviction of the offense charged in this Information, the government will seek forfeiture, in accordance with Title 18, United States Code, Section 982(a)(2)(A), of any and all property, real and personal, that constitutes and is derived from proceeds RAGAN obtained directly or indirectly as a result of the violation of Title 18, United States Code, Section 1349 alleged in this Information.

### **SUBSTITUTE ASSETS PROVISION**

3. If by any act or omission of RAGAN, any of the property subject to forfeiture described herein:

- 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 subdivided without difficulty,

the United States of America will be entitled to forfeiture of substitute property up to the value of the property described above, pursuant to Title 18, United States Code, Section 982(b) and Title 21, United States Code, Section 853(p).

  
RACHAEL A. HONIG  
Acting United States Attorney



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

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

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**UNITED STATES OF AMERICA**

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**TASHON RAGAN  
a/k/a “Ta”**

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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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