

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

UNITED STATES OF AMERICA	:	Hon.
	:	
	:	Criminal No. 21-
v.	:	
	:	18 U.S.C. § 1349
	:	18 U.S.C. § 2
JEFFREY BENNETT	:	

**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:

1. At times material to this Information:

**Background**

a. Defendant JEFFREY BENNETT (“BENNETT”) was a resident of Irvington, New Jersey.

b. Janel Blackman (“Blackman”), a co-conspirator not charged in this Information, was a resident of Newark, New Jersey, and employed by the United States Postal Service (“USPS”) as a clerk at a post office in Summit, New Jersey (the “Summit PO”).

c. Ayanah Sade McCall (“McCall”), a co-conspirator not charged in this Information, was employed as a clerk at the Summit PO.

d. Jahaad Flip (“Flip”), a co-conspirator not charged in this Information, was a resident of Newark, New Jersey, and the son of Blackman.

e. Tashon Ragan (“Ragan”), a co-conspirator not charged in this Information, was a resident of Hillside, New Jersey.

f. 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”).

### **The Conspiracy**

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

### **JEFFREY BENNETT**

knowingly and intentionally did conspire and agree with Blackman, McCall, Flip, Ragan, 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 money, 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 BENNETT and the Co-Conspirators to enrich themselves by fraudulently obtaining money from victim financial institutions.

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

4. It was part of the conspiracy that:

a. BENNETT and the Co-Conspirators arranged for United States Postal Service ("USPS") employees, including Blackman and McCall, to steal credit cards and blank checkbooks from the United States mail in exchange for cash payments.

b. Blackman and McCall stole 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 Blackman and McCall, provided stolen checkbooks and credit cards to BENNETT and the Co-Conspirators.

d. BENNETT and the Co-Conspirators paid approximately \$100 to Blackman and McCall for each stolen checkbook or credit card that they received from Blackman and McCall.

e. BENNETT and the Co-Conspirators solicited accountholders at various financial institutions, including New Jersey high school students (the "Complicit Accountholders"), to provide their banking information to BENNETT and the Co-Conspirators in exchange for the promise of cash.

f. BENNETT and the Co-Conspirators fraudulently negotiated and endorsed the stolen checks in the names of the Complicit Accountholders and deposited and attempted to deposit the stolen checks into the accounts of the Complicit Accountholders (the “Fraud Accounts”).

g. BENNETT and the Co-Conspirators created counterfeit 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, BENNETT 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 2, 2019, using personal banking information obtained from a Complicit Accountholder (“Complicit Accountholder 1”), BENNETT deposited at an ATM in New Jersey a fraudulent check in the amount of approximately \$399 that had been stolen from the Summit PO, into the Bank 1 account of Complicit Accountholder 1.

j. On or about October 23, 2019, using personal banking information obtained from another Complicit Accountholder (“Complicit Accountholder 2”), BENNETT, Ragan, 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 Complicit Accountholder 2. On or about October 23, 2019, BENNETT and Ragan

withdrew a total of approximately \$900 at an ATM in New Jersey from one of Complicit Accountholder 2's Bank 1 accounts before Bank 1 identified the checks as fraudulent and blocked further withdrawals from the account.

k. On or about May 16, 2020, BENNETT fraudulently used a credit card issued by Bank 2 to another individual to purchase a laptop online for approximately \$1,812.61. BENNETT later picked up the laptop in Holmdel, New Jersey, using a fake driver's license in that individual's name but bearing BENNETT's picture.

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

### **FORFEITURE ALLEGATION**

1. The allegations contained in this Information are realleged here 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 that, upon conviction of the offense charged in this Information, defendant

#### **JEFFREY BENNETT**

shall forfeit to the United States, pursuant to 18 U.S.C. § 982(a)(2)(A), all property, real and personal, that constitutes and is derived from proceeds the defendant obtained directly or indirectly as a result of the violation of Title 18, United States Code, Section 1349, alleged in this Information.

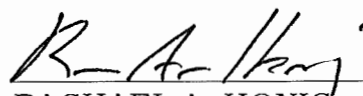
### **SUBSTITUTE ASSETS PROVISION**

3. If by any act or omission of BENNETT, 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 divided without difficulty,

the United States 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).



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RACHAEL A. HONIG  
Acting United States Attorney

**CASE NUMBER: 21-**

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**v.**

**JEFFREY BENNETT**

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**INFORMATION FOR**

**18 U.S.C. § 1349**

**18 U.S.C. § 2**

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

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