

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
EVANSVILLE DIVISION

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
v.)
)
MICHAEL JEROME WRIGHT and)
)
CORTNEY LASHEA YOUNG,)
)
Defendants.)

Cause No. 3:24-CR-13-MPB-CSW

-01

-02

FILED

APR 18 2024

U.S. DISTRICT COURT
EVANSVILLE, INDIANA

INDICTMENT

The Grand Jury charges that:

GENERAL ALLEGATIONS

Background Regarding Arrow Locks and Keys

1. The United States Postal Service ("USPS") uses a unique type of lock known as an "arrow lock" to secure USPS collection boxes, outdoor parcel lockers, cluster box units, and apartment mailbox panels.
2. Arrow locks are unlocked through the use of a corresponding "arrow key." USPS employees use arrow keys as part of their delivery and collection duties.

Background Regarding Machineguns

3. Under United States law, a "machinegun" is any weapon which shoots, is designed to shoot, or can be readily restored to shoot, automatically more than one shot, without manual reloading, by a single function of the trigger.
4. Under United States law, the term "machinegun" also includes any part designed and intended solely and exclusively for use in converting a weapon into a machinegun.

5. A “Glock switch” is a small device that, when properly installed on a semiautomatic Glock pistol, and other similarly designed semiautomatic pistols, will convert said firearm to a fully automatic machinegun. Installation of this device is quick, simple, and requires no technical expertise; it is completed by removing the polymer slide cover plate on a Glock or a similarly designed semi-automatic pistol and replacing it with the conversion device. This type of device is referred to by different names, including, but not limited to, a switch, auto sear, convertor, conversion switch, selector switch, conversion device, fun switch, invisa-switch, and Fire Selector System for Glock. Glock switches can be produced using 3D printing technology.

6. A Glock switch, whether or not it is installed in a firearm, is a machinegun under federal law, as it is a part designed and intended solely and exclusively for use in converting a weapon into a machinegun.

COUNT 1
18 U.S.C. § 1704
Unlawful Possession of a Mail Key

7. Paragraphs 1 through 2 of this Indictment are incorporated herein.

8. On or about April 3, 2024, within the Southern District of Indiana, MICHAEL JEROME WRIGHT, a defendant herein, did knowingly possess a key suited to one or more locks adopted by the United States Postal Service and in use on the mails, and a key to one or more lock boxes and other authorized receptacles for the deposit and delivery of mail matter, that is, a United States Postal Service arrow key, with the intent unlawfully and improperly to use the key, and to cause the key to be unlawfully and improperly used.

All of which is in violation of Title 18, United States Code, Section 1704.

COUNT 2
18 U.S.C. § 1708
Mail Theft

9. On or about April 3, 2024, within the Southern District of Indiana, MICHAEL JEROME WRIGHT and CORTNEY LASHEA YOUNG, the defendants herein, did knowingly steal, take, and abstract letters, postal cards, packages, and mail, including the mail identified below, from and out of letter boxes, mail receptacles, and other authorized depositories for mail matter, and did knowingly possess letters, postal cards, packages, mail, and other articles and things contained therein, including the mail identified below, which had been stolen from and out of letter boxes, mail receptacles, and other authorized depositories for mail matter, knowing the same to have been stolen, and did aid and abet each other in so doing.

- a. Two pieces of mail addressed to the Internal Revenue Service, in Louisville, Kentucky, from Person D.M., in Evansville, Indiana;
- b. Two pieces of mail addressed to the Indiana Department of Revenue, in Indianapolis, Indiana, from Person D.M., in Evansville, Indiana;
- c. A piece of mail addressed to the Internal Revenue Service, in Louisville, Kentucky, from Person R.G., in Evansville, Indiana;
- d. A piece of mail addressed to the Internal Revenue Service, in Kansas City, Missouri, from BUSINESS 1, in Evansville, Indiana;
- e. A piece of mail addressed to Persons J.G. and B.C., in Minnetonka, Minnesota, from Persons D.S. and T.M., in Evansville, Indiana; and
- f. Approximately 100 pieces of mail addressed to various individuals, including J.F., in Henderson, Kentucky, from Person M.W., in Evansville, Indiana.

All of which is in violation of Title 18, United States Code, Sections 1708 and 2.

COUNT 3
18 U.S.C. § 1029(a)(3)
Access Device Fraud

10. On or about April 3, 2024, within the Southern District of Indiana, MICHAEL JEROME WRIGHT, a defendant herein, did knowingly and with intent to defraud, possess fifteen or more unauthorized access devices—that is, credit cards, debit cards, and gift cards that were lost, stolen, and obtained with intent to defraud, including the cards identified below—and said possession affected interstate and foreign commerce.

No.	Name on Card	Last Four Digits of Card Number
1	K.B.	7431
2	K.B.	0253
3	K.B.	0525
4	M.B.	3265
5	I.B.	1527
6	F.F.	3971
7	A.G.	1595
8	T.H.	7272
9	T.H.	8565
10	T.H.	3945
11	D.H.	5153
12	D.H.	7975
13	A.J.	9011
14	P.L.	8581
15	P.L.	3833
16	P.L.	5263
17	P.L.	8667
18	P.L.	2295
19	P.L.	2497
20	P.L.	1142

21	N.M.	6731
22	A.M.	4057
23	A.M.	5894
24	K.M.	5945
25	M.M.	1031
26	A.P.	8356
27	R.T.	5161
28	B.W.	5644
29	K.W.	0210
30	L.Y.	4478

All of which is in violation of Title 18, United States Code, Section 1029(a)(3).

COUNT 4
18 U.S.C. § 1028A(a)(1)
Aggravated Identity Theft

11. On or about April 3, 2024, within the Southern District of Indiana, MICHAEL JEROME WRIGHT, a defendant herein, did knowingly possess, without lawful authority, a means of identification of another person, that is, the Social Security account number of Person A.M., during and in relation to a felony violation enumerated in 18 U.S.C. § 1028A(c), to wit Access Device Fraud, as alleged in Count 3 of this Indictment, knowing that the means of identification belonged to another actual person.

All of which is in violation of Title 18, United States Code, Section 1028A(a)(1).

COUNT 5
18 U.S.C. § 922(g)(1)
Possession of Ammunition by a Prohibited Person

12. On or about April 3, 2024, within the Southern District of Indiana, MICHAEL JEROME WRIGHT, a defendant herein, did knowingly possess in and affecting commerce ammunition, that is, one or more rounds of Browning 9mm ammunition, after knowingly having

been convicted of one or more crimes punishable by imprisonment for a term exceeding one year, to wit:

- a. Operating a Vehicle as a Habitual Traffic Violator, in Vanderburgh County, Indiana, under Cause Number 82D03-1809-F6-006096, on or about June 13, 2019;
- b. Operating a Vehicle While Intoxicated, in Vanderburgh County, Indiana, under Cause Number 82D02-1610-F6-005836, on or about February 7, 2017;
- c. Dealing in a Synthetic Drug or Synthetic Drug Lookalike Substance, in Vanderburgh County, Indiana, under Cause Number 82D02-1501-F6-000199, on or about February 7, 2017; and
- d. Murder, in Cook County, Illinois, under Cause Number 96CR2519301, on or about November 14, 1997.

All of which is in violation of Title 18, United States Code, Section 922(g)(1).

COUNT 6
18 U.S.C. § 922(o)(1)
Possession of a Machinegun

13. Paragraphs 3 through 6 of this Indictment are incorporated herein.

14. On or about April 3, 2024, within the Southern District of Indiana, MICHAEL JEROME WRIGHT, a defendant herein, did knowingly possess a machinegun, to wit: a loaded 9mm caliber pistol made using a plastic polymer 3D printed hand grip and metal component parts bearing no serial number with an installed Glock switch allowing the pistol to fire automatically.

All of which is in violation of Title 18, United States Code, Section 922(o)(1).

COUNT 7
18 U.S.C. § 922(g)(1)
Possession of a Firearm by a Prohibited Person

15. On or about April 3, 2024, within the Southern District of Indiana, CORTNEY LASHEA YOUNG, a defendant herein, did knowingly possess in and affecting commerce a firearm, that is, a Ruger LCP .380 caliber pistol, after knowingly having been convicted of a crime punishable by imprisonment for a term exceeding one year, to wit: Fraud, in Gibson County, Indiana, under Cause Number 26C01-2105-F6-000522, on or about October 27, 2021.

All of which is in violation of Title 18, United States Code, Section 922(g)(1).

FORFEITURE

1. The allegations contained in Count 2 of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461.

2. Upon conviction of an offense in violation of Title 18, United States Code, Section 1708, as set forth in Count 2 of this Indictment, the named defendant shall forfeit to the United States:

a. pursuant to Title 18, United States Code, Section 981(a)(1)(C), any property, real or personal, which constitutes or is derived from proceeds traceable to the offense; and

b. a sum of money equal to the total amount of the proceeds of the offense (money judgment).

3. The allegations contained in Count 3 of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Sections 982(a)(2)(B) and 1029(c)(1)(C).

4. Upon conviction of an offense in violation of Title 18, United States Code, Section 1029, as set forth in Count 3 of this Indictment, the named defendant shall forfeit to the United States:

c. pursuant to Title 18, United States Code, Section 982(a)(2), any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of such violation;

d. pursuant to Title 18, United States Code, Section 1029(c)(1)(C), any personal property used or intended to be used to commit the offense; and

e. a sum of money equal to the total amount of the proceeds of the offense (money judgment).

5. The allegations contained in Counts 5, 6, and 7 of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c).

6. Upon conviction of an offense in violation of Title 18, United States Code, Section 922, as set forth in Counts 5, 6, and 7 of this Indictment, the named defendant shall forfeit to the United States pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c), any firearm and ammunition involved in the commission of the offense, including, but not limited to:

a. a partially 3D printed Privately Made Firearm 9mm caliber pistol bearing no serial number;

b. a Ruger LCP .380 caliber pistol bearing serial number 371131484; and

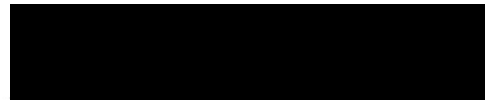
c. all ammunition recovered with the firearms.

7. If any property subject to forfeiture, as a result of any act or omission of the defendant:

- 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 shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c). In keeping with the foregoing, it is the intent of the United States to seek forfeiture of any other property of the defendant up to the value of all forfeitable property.

A TRUE BILL:



FOREPERSON

ZACHARY A. MYERS
United States Attorney

By:


Matthew B. Miller
Assistant United States Attorney
TSS