UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

FILED
DEC 1 7 2025 bif
U.S. CLERK'S OFFICE
INDIANAPOLIS, INDIANA

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
v.	)	CAUSE NO.
	)	1:25-cr-253-MPB-MJD
JANEA REAVES,	) -01	
JERMAINE REAVES,	) -02	
DEJON FOX,	) -03	
	)	
Defendants.	)	

INDICTMENT

The Grand Jury charges that:

COUNT 1
Conspiracy to Commit Access Device Fraud
18 U.S.C. § 1029(a)(2), (a)(3), (a)(5), and (b)(2)

Beginning on a date unknown but at least as early as on or about May 5, 2023, and continuing through on or about March 13, 2025, in the Southern District of Indiana and elsewhere, the defendants, JANEA REAVES, JERMAINE REAVES, and DEJON FOX, did knowingly and unlawfully conspire and agree, together and with others known and unknown to the Grand Jury, to commit one or more of the following offenses:

a. Knowingly and with intent to defraud, use one or more unauthorized access devices, and by such conduct, to obtain anything of value aggregating $1,000 or more within a one-year period, said use affecting interstate commerce, in violation of Title 18, United States Code, Section 1029(a)(2);

b. Knowingly and with intent to defraud, possess fifteen (15) or more unauthorized access devices, said possession affecting interstate commerce, in violation of Title 18, United States Code, Section 1029(a)(3); and

c. Knowingly and with intent to defraud, effect transactions with one or more access devices issued to another person or persons, to receive anything of value during a one-year period the aggregate value of which is equal to or greater than $1,000, said conduct affecting interstate commerce, in violation of Title 18, United States Code, Section 1029(a)(5).

Manner and Means of the Conspiracy

It was part of the conspiracy that the defendants, JANEA REAVES, JERMAINE REAVES, and DEJON FOX, and others known and unknown to the Grand Jury, stole, and possessed stolen, mail matter containing pre-paid debit cards that had been mailed and issued to actual persons. It was part of the conspiracy that the defendants and others known and unknown to the Grand Jury called activation services telephone numbers to activate these stolen pre-paid debit cards, and then used, and attempted to use, these stolen pre-paid debit cards to effect transactions and obtain merchandise, goods, and other items of value in the Southern District of Indiana and elsewhere.

Overt Acts in Furtherance of the Conspiracy

In furtherance of the conspiracy and to accomplish the objects of the conspiracy, the defendants committed the following overt acts in the Southern District of Indiana and elsewhere:

a. On numerous occasions on dates unknown, JANEA REAVES used her position as an employee with the United States Postal Service ("USPS") at the Processing & Distribution Center in Indianapolis, Indiana, within the Southern District of Indiana, to steal mail matter containing pre-paid debit cards issued to another person.

b. On or about September 28, 2024, JERMAINE REAVES and DEJON FOX entered the United States Postal Service ("USPS") Processing & Distribution Center in Indianapolis, Indiana, within the Southern District of Indiana, and stole mail matter containing pre-paid debit cards issued to another person.

c. On or about October 5, 2024, JERMAINE REAVES and DEJON FOX entered the USPS Processing & Distribution Center in Indianapolis, Indiana, within the Southern District of Indiana, and stole mail matter containing pre-paid debit cards issued to another person.

d. On or about October 12, 2024, JERMAINE REAVES and Person A entered the USPS Processing & Distribution Center in Indianapolis, Indiana, within the Southern District of Indiana, and stole mail matter containing pre-paid debit cards issued to another person.

e. On or about October 13, 2024, JERMAINE REAVES texted Person A an article regarding a former postal worker who was sentenced for theft of mail from the USPS Processing & Distribution Center in Indianapolis, Indiana. Person A responded, "Now why tf u ain't send this previously."

f. On or about October 13, 2024, Person A texted JANEA REAVES the same article regarding a former postal worker who was sentenced for theft. JANEA REAVES told Person A, "I think they probably just gone be on the look out to make sure yall don't come back."

g. On or about June 20, 2024, JANEA REAVES called to activate a stolen pre-paid debit card ending in 2012, issued to S.B.

h. On or about June 20, 2024, JANEA REAVES used the stolen pre-paid debit card ending in 2012 for a transaction in the amount of $69.40 for AT&T bill payment.

i. On or about October 5, 2024, DEJON FOX called to activate a stolen pre-paid debit card ending in 7917, issued to S.G.

j. On or about October 6, 2024, DEJON FOX used the stolen pre-paid debit card ending in 7917 for a transaction in the amount of $16.39 for DoorDash.

k. On or about November 3, 2024, JERMAINE REAVES called to activate a stolen pre-paid debit card ending in 8540, issued to A.S.

l. On or about November 4, 2024, JERMAINE REAVES used the stolen pre-paid debit card ending in 8540 for a transaction in the amount of $38.28 for DoorDash.

m. On or about March 13, 2025, DEJON FOX possessed stolen mail matter, which contained a pre-paid debit card, addressed to L.L.

n. On or about March 13, 2025, JANEA REAVES and Person B possessed stolen pre-paid debit cards issued in the names of J.E., B.B., J.K., S.T., E.J., and others.

o. On or about March 13, 2025, JANEA REAVES and Person B possessed stolen mail matter addressed to A.H. and P.S.

All in violation of Title 18, United States Code, Section 1029(b)(2).

COUNT 2
Illegal Transactions with an Access Device
18 U.S.C. § 1029(a)(5)

From on or about January 20, 2024, to on or about January 1, 2025, in the Southern District of Indiana and elsewhere, the defendant, JANEA REAVES, did knowingly and with intent to defraud, effect transactions with one or more access devices issued to another person or persons, to receive anything of value during a one-year period the aggregate value of which is equal to or greater than $1,000, said conduct affecting interstate commerce.

All in violation of Title 18, United States Code, Section 1029(a)(5).

COUNT 3
Theft of Mail
18 U.S.C. § 1708

On or about September 28, 2024, in the Southern District of Indiana, the defendants JERMAINE REAVES and DEJON FOX, did steal, take, and abstract, and attempt to steal, take, and abstract letters and mail from and out of any mail, post office, and station thereof, mail receptable, and authorized depository for mail matter, that is the United States Processing and Distribution Center, located at 125 West South Street, Indianapolis, Indiana 46206.

All in violation of Title 18, United States Code, Section 1708.

COUNT 4
Theft of Mail
18 U.S.C. § 1708

On or about October 5, 2024, in the Southern District of Indiana, the defendants JERMAINE REAVES and DEJON FOX, did steal, take, and abstract, and attempt to steal, take, and abstract letters and mail from and out of any mail, post office, and station thereof, mail receptable, and authorized depository for mail matter, that is the United States Postal Service Processing and Distribution Center, located at 125 West South Street, Indianapolis, Indiana 46206.

All in violation of Title 18, United States Code, Section 1708.

FORFEITURE

1. The allegations contained in 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).

2. Upon conviction of the offenses in violation of Title 18, United States Code, Section 1029 set forth in the Indictment, the defendants, JANEA REAVES, JERMAINE REAVES, and DEJON FOX, shall forfeit to the United States of America,

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

b. Pursuant to Title 18, United States Code, Section 1029(c)(1)(C), any personal property used or intended to be used to commit the offenses. The property to be forfeited includes, but is not limited to: all pre-paid debit cards used, or intended to be used, to commit the offenses.

3. Further, upon conviction, the United States will seek an order of forfeiture in the form of a money judgment, representing the amount of proceeds each defendant obtained from the offense as charged.

4. If any of the property described above, as a result of any act or omission of the defendants:

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 of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Sections 982(b)(1) and 1029(c)(2) and Title 28, United States Code, Section 2461(c).

All pursuant to 18 U.S.C. §§ 982(a)(2)(B) and 1029(c)(1)(C) and 28 U.S.C. § 2461(c).

A TRUE BILL:

[redacted]
FOREPERSON

THOMAS E. WHEELER II
United States Attorney

By: Meredith Wood
Meredith Wood
Assistant United States Attorney
::KMS