FILED

DEC 17 2024

U.S. DISTRICT COURT
INDIANAPOLIS, INDIANA

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
v.	)	CAUSE NO. 1:24-cr-221-SEB-TAB
	)	
DESTINEE RUFFIN,	)	-01
TONY MCMULLEN,	)	-02
JOHN YOUNG,	)	-03
KENDALL THOMPSON, and	)	-04
ERIC HOLLIS,	)	-05
	)	
Defendants.	)	

INDICTMENT

The Grand Jury charges that:

General Allegations

At times material to this Indictment:

Relevant Entities

1. The United States Postal Service Bacon Station Post Office was located at 2727 E 55th St, Indianapolis, Indiana, within the Southern District of Indiana. The Bacon Station Post Office services residents in Indianapolis.

2. First Merchants Bank is a financial institution with branches located throughout central Indiana. Its deposits are insured by the Federal Deposit Insurance Corporation.

3. Signature Bank is a financial institution with branches located in Chicago, Illinois. Its deposits are insured by the Federal Deposit Insurance Corporation.

4. The Farmers Bank is a financial institution with branches located throughout Indiana. Its deposits are insured by the Federal Deposit Insurance Corporation.

The Defendants

5. DESTINEE RUFFIN was a resident of Indianapolis, Indiana. During the relevant period, RUFFIN was employed by the United States Postal Service as a mail carrier operating out of the Bacon Station Post Office. In her position as a mail carrier, RUFFIN had access to outgoing mail as well as mail addressed to Post Office Boxes located within Bacon Station Post Office.

6. TONY MCMULLEN was a resident of Illinois.

7. JOHN YOUNG, KENDALL THOMPSON, and ERIC HOLLIS were residents of the Southern District of Indiana.

Economic Impact Payments

8. In 2020 and 2021, in response to the COVID-19 pandemic, Congress authorized the issuance of Economic Impact Payments (EIPs) to taxpayers. EIPs, also known as stimulus checks, were direct payments from the federal government authorized in the Coronavirus Aid, Relief, and Economic Stability (CARES) Act, the Consolidated Appropriations Act of 2020, and the American Rescue Plan (ARP) Act of 2021. Many EIPs were provided as checks that were to be delivered through the U.S. Mail.

9. EIP checks were issued by Untied States Treasury, on behalf of the Internal Revenue Service. EIP checks drew on an account held at the Federal Reserve Bank of New York.

The Conspiracy and Scheme to Defraud

10. Beginning on or before October 1, 2020, and continuing to on or about June 2, 2021, the defendants conspired to engage in a scheme to defraud by stealing checks from the

U.S. Mail, including EIP checks and checks from businesses, and then fraudulently negotiating the stolen checks at financial institutions for the purpose of unlawfully enriching themselves.

Manner and Means of the Scheme to Defraud

11. As part of the conspiracy and scheme to defraud, RUFFIN used her position with the United States Postal Service and her access to the U.S. Mail to steal from the Bacon Station Post Office mailed letters and parcels containing checks, including EIP checks and checks from businesses.

12. Once RUFFIN had stolen the checks, she provided the stolen checks to MCMULLEN, YOUNG, or one of their co-conspirators. In exchange, MCMULLEN, YOUNG, or their co-conspirators paid RUFFIN for the stolen checks they received.

13. MCMULLEN and YOUNG then arranged for the stolen checks to be deposited or cashed at financial institutions without the knowledge or authorization of the U.S. Treasury (in the case of stolen EIP checks) or victim businesses (in the case of stolen checks from businesses).

14. MCMULLEN and YOUNG deposited the stolen checks into a co-conspirator's bank account, and then withdrew some or all of the deposited stolen funds. As a result of the deposits, funds were transferred from the U.S. Treasury or from the victims' bank accounts to a bank account owned or controlled by someone other than the intended payee, namely MCMULLEN, YOUNG, or their co-conspirators.

15. THOMPSON was one of YOUNG's co-conspirators. THOMPSON knowingly allowed YOUNG to deposit stolen checks into a bank account THOMPSON controlled in exchange for compensation.

16. YOUNG relied on a network of co-conspirators to solicit people willing to allow YOUNG to deposit checks into their accounts. Both HOLLIS and THOMPSON helped YOUNG find co-conspirators who allowed YOUNG to deposit stolen checks into their accounts.

17. In addition, HOLLIS also allowed YOUNG to use HOLLIS's residence to store the stolen checks.

18. On other occasions, YOUNG took the banking information found on the bottom of the stolen checks he received and created new counterfeit checks using this banking information. YOUNG then sold these checks online.

19. In total, the conspiracy arranged for the fraudulent negotiation of thousands of checks worth millions of dollars.

COUNT 1
Conspiracy to Commit Bank Fraud
18 U.S.C. § 1349

20. Paragraphs 1 through 19 are incorporated by reference.

21. Beginning on or before October 1, 2020, and continuing to on or about June 2, 2021, within the Southern District of Indiana and elsewhere, the Defendants herein,

DESTINEE RUFFIN,
TONY MCMULLEN,
JOHN YOUNG,
KENDALL THOMPSON, and
ERIC HOLLIS,

and others, did knowingly combine, conspire, confederate, and agree to violate Title 18, United States Code, Section 1344(2) ("Bank Fraud"). That is, they knowingly executed, and attempted to execute, a scheme or artifice to obtain monies, funds, credits, assets, securities, or other property owned by, and under the custody or control of, a financial institution, by means of false and fraudulent pretenses, representations, and promises.

All of which is in violation of Title 18, United States Code, Section 1349.

COUNTS 2–7
Bank Fraud
18 U.S.C. §§ 1344(2) and 2

22. Paragraphs 1 through 19 are incorporated by reference.

23. On or about the dates described in the chart below, within the Southern District of Indiana and elsewhere, the Defendants herein,

DESTINEE RUFFIN,
TONY MCMULLEN,
JOHN YOUNG, and
KENDALL THOMPSON,

and others, did knowingly execute, and attempted to execute, and aid and abet another in the execution of a scheme or artifice to obtain any of the monies, funds, credits, assets, securities, and other property owned by, and under the custody or control of, the financial institution, by means of false and fraudulent pretenses, representations, and promises; namely, by negotiating stolen checks and depositing them into a bank account other than the bank account of the intended payee as listed in each Count listed below:

Count	On or About Date	Defendants	Check No.	Amount	Financial Institution
2	January 13, 2021	RUFFIN MCMULLEN	#02478776	$1,800	Federal Reserve Bank of New York
3	January 13, 2021	RUFFIN MCMULLEN	#4043-02479426	$1,800	Federal Reserve Bank of New York
4	April 16, 2021	RUFFIN MCMULLEN	#09036209	$4,200	Federal Reserve Bank of New York
5	October 21, 2022	RUFFIN YOUNG	#58250	$3,477.20	First Merchants Bank

Count	On or About Date	Defendants	Check No.	Amount	Financial Institution
6	October 27, 2022	RUFFIN YOUNG	#408588	$6,998.54	Signature Bank
7	May 17, 2022	RUFFIN YOUNG THOMPSON	#2481	$3,110	The Farmers Bank

Each Count is a violation of Title 18, United States Code, Sections 1344(2) and 2.

COUNT 8
Theft of Mail
18 U.S.C. § 1708

24. Paragraphs 1 through 19 are incorporated by reference.

25. On or about the April 1, 2021, in the Southern District of Indiana, the defendant, DESTINEE RUFFIN, did steal and take from and out of a mail route from Carrier Route 39 in Indianapolis, Indiana, a piece of mail addressed to Victim 1 at Ruckle St, Indianapolis, Indiana 46205.

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

FORFEITURE

1. The allegations contained in Counts 1 through 7 of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Sections 981(a)(1)(C), 982(a)(2) and Title 28, United States Code, Section 2461(c).

2. Upon conviction of the offenses in violation of Title 18, United States Code, Section 1344 set forth in Counts 1 through 7 of this Indictment, DESTINEE RUFFIN, TONY MCMULLEN, JOHN YOUNG, KENDALL THOMPSON, and ERIC HOLLIS, the Defendants, shall forfeit to the United States of America, pursuant to Title 18, United States Code, Sections 981(a)(1)(C), 982(a)(2) and Title 28, United States Code, Section 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the offenses, including but not limited to or an order of forfeiture in the amount of proceeds the defendants obtained from the offense.

3. 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 28, United States Code, Section 2461(c).

All pursuant to 18 U.S.C. §§ 981(a)(1)(C), 982(a)(2) and 28 U.S.C. § 2461(c).

A TRUE BILL:

[redacted]

FOREPERSON

ZACHARY A. MYERS
United States Attorney

By: ______________________
Adam Eakman
Assistant United States Attorney
NJL