

UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON  
PORTLAND DIVISION

UNITED STATES OF AMERICA

3:20-cr- 00005-SI

v.

INDICTMENT

MACKENZIE BRASWELL SHERMAN,

18 U.S.C. § 1028A; 1029; 641;

42 U.S.C. § 408

Defendant.

Forfeiture Allegation

THE GRAND JURY CHARGES:

COUNT 1

(Aggravated Identity Theft)

(18 U.S.C. § 1028A, 2)

On or about April 16, 2019, in the District of Oregon, defendant MACKENZIE BRASWELL SHERMAN did knowingly possess and use, without lawful authority, means of identification of another, including name, social security number, and date of birth, during and in relation to a felony violation enumerated in 18 U.S.C. § 1028A(c), to wit: 18 U.S.C. § 641 and 42 U.S.C. § 408, knowing that the means of identification belonged to other actual persons;

In violation of Title 18, United State Code, Sections 1028A, 2.

COUNT 2

(Social Security Fraud)

(42 U.S.C. § 408(a)(7)(B), 2)

On or about April 16, 2019, in the District of Oregon, defendant MACKENZIE BRASWELL SHERMAN, did for the purpose of obtaining something of value and for any other

**Indictment**

purpose, while having the intent to deceive, falsely represented a social security account number assigned by the Commissioner of Social Security to be his own when it was not, to wit: on or about April 16, 2019, in the District of Oregon, defendant MACKENZIE BRASWELL SHERMAN submitted, or caused to be submitted, to the Oregon Department of Human Services, an application for Supplemental Nutrition Assistance Program (SNAP) benefits, on which he falsely represented a full nine-digit social security number, summarized here as XXX-XX-9069, to be his own when he knew said social security number belonged to another person;

In violation of Title 42 United State Code, Section 408(a)(7)(B) and 18 United States Code, Section 2.

**COUNT 3**  
**(Theft of Government Funds)**  
**(18 U.S.C. § 641, 2)**

Between in or about April 1, 2019, and continuing through on or about October 31, 2019, in the District of Oregon, defendant MACKENZIE BRASWELL SHERMAN did knowingly and willfully steal and convert to his own use or the use of another, money of the United States Department of Agriculture, a department and agency of the United States, to wit: by receiving Supplemental Nutrition Assistance Program (SNAP) payments in an approximate amount of \$1,152.00, based on fraudulent representations and concealments;

All in violation of Title 18, United States Code, Sections 641, 2.

**COUNT 4**  
**(Aggravated Identity Theft)**  
**(18 U.S.C. § 1028A, 2)**

On or about October 29, 2019, in the District of Oregon, defendant MACKENZIE BRASWELL SHERMAN did knowingly possess and use, without lawful authority, means of

identification of another, including name, social security number, date of birth, and fraudulent State or government issued driver's license or identification number, and credit card numbers, during and in relation to a felony violation enumerated in 18 U.S.C. § 1028A(c), to wit: 18 U.S.C. §§ 1029(a)(1), knowing that the means of identification belonged to other actual persons;

In violation of Title 18, United State Code, section 1028A, 2.

**COUNT 5**  
**(Fraud in Connection with Access Devices)**  
**(18 U.S.C. § 1029(a)(1), 2)**

On or about October 29, 2019, in the District of Oregon, defendant MACKENZIE BRASWELL SHERMAN knowingly and with intent to defraud, possessed, used and trafficked in one or more counterfeit access devices, including fraudulent credit card numbers, a credit card reader/scanner and State or government issued driver's license or identification cards, said possession, use and trafficking affecting interstate and foreign commerce, in that defendant used said fraudulent credit card numbers, credit card reader/scanner and identification cards to purchase items, including a vehicle;

All in violation of Title 18, United States Code, Sections 1029(a)(1) and (c)(1)(A)(ii), 2.

**FORFEITURE ALLEGATION**

Upon conviction of the offense alleged in Counts 3 or 5 of this Indictment, defendant MACKENZIE BRASWELL SHERMAN shall forfeit to the United States pursuant to 18 U.S.C. §§ 981(a)(1)(C), 982(a)(2)(A), and 28 U.S.C. § 2461(c), any property, real or personal, which constitutes or is derived from proceeds defendant obtained directly and indirectly, as the result of such violation or traceable thereto.

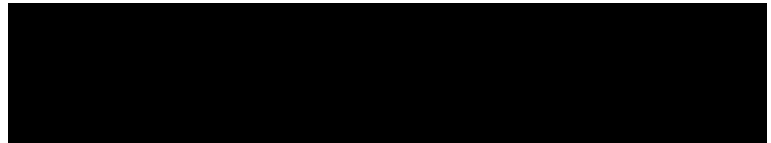
If any of the above-described forfeitable property, as a result of any act or omission of the defendant MACKENZIE BRASWELL SHERMAN:

- (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;

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p) as incorporated by 18 U.S.C. § 982(b) and 28 U.S.C. § 2461(c), to seek forfeiture of any other property of said defendant MACKENZIE BRASWELL SHERMAN up to the value of the forfeitable property described in these forfeiture allegations.

Dated: January 8, 2020

A TRUE BILL.



OFFICIATING FOREPERSON

Presented by:

BILLY J. WILLIAMS  
United States Attorney

A handwritten signature in blue ink, appearing to read 'R. Sowray', written over a horizontal line.

RACHEL SOWRAY, OSB #095159  
Special Assistant United States Attorney