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US DISTRICT COURT E.D.N.Y.
* JULY 09, 2024 *
BROOKLYN OFFICE

KCB:EL
F. #2023R00410

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
----- X

UNITED STATES OF AMERICA

INDICTMENT

- against -

Cr. No. 24-CR-278
(T. 18, U.S.C., §§ 492, 510(a)(2), 641,
981(a)(1)(C), 982(a)(2), 982(b)(1), 2 and
3551 et seq.; T. 21, U.S.C., § 853(p);
T. 28, U.S.C., § 2461(c))

MARK DAWSON,

Defendant.

Judge LaShann DeArcy Hall
Magistrate Judge Robert M. Levy

----- X
THE GRAND JURY CHARGES:

COUNT ONE
(Theft of Government Funds)

1. In or about August 2022, within the Eastern District of New York and elsewhere, the defendant MARK DAWSON, together with others, did knowingly and intentionally embezzle, steal, purloin and convert to his own use and the use of another money and things of value of the United States and of a department and agency thereof, to wit: checks issued by the United States Department of the Treasury, the aggregate value of which exceeded the sum of \$1,000.

(Title 18, United States Code, Sections 641, 2 and 3551 et seq.)

COUNT TWO
(Passing Treasury Checks Bearing Forged Endorsements)

2. In or about August 2022, within the Eastern District of New York and elsewhere, the defendant MARK DAWSON, together with others, did knowingly and with intent

to defraud pass, utter and publish United States Treasury checks bearing falsely made and forged endorsements and signatures, the aggregate face value of which exceeded \$1,000.

(Title 18, United States Code, Sections 510(a)(2), 2 and 3551 et seq.)

CRIMINAL FORFEITURE ALLEGATION
AS TO COUNT ONE

3. The United States hereby gives notice to the defendant that, upon his conviction of the offense charged in Count One, the government will seek forfeiture in accordance with Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), which require any person convicted of such offense to forfeit any property, real or personal, constituting, or derived from, proceeds obtained directly or indirectly as a result of such offense.

4. If any of the above-described forfeitable property, 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;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described in this forfeiture allegation.

(Title 18, United States Code, Section 981(a)(1)(C); Title 21, United States Code, Section 853(p); Title 28, United States Code, Section 2461(c))

CRIMINAL FORFEITURE ALLEGATION
AS TO COUNT TWO

5. The United States hereby gives notice to the defendant that, upon his conviction of the offense charged in Count Two, the government will seek forfeiture in accordance with: (a) Title 18, United States Code, Section 982(a)(2), which requires any person convicted of such offense, to forfeit any property constituting, or derived from, proceeds obtained directly or indirectly as a result of such offense; and (b) Title 18, United States Code, Section 492 and Title 28, United States Code, Section 2461(c), which require the forfeiture of: (i) all counterfeits of any coins or obligations or other securities of the United States or of any foreign government; (ii) any articles, devices, and other things made, possessed, or used in violation of Title 18, United States Code, Section 510; or (iii) any material or apparatus used or fitted or intended to be used, in the making of such counterfeits, articles, devices or things.

6. If any of the above-described forfeitable property, 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;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Sections 982(b)(1), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described in this forfeiture allegation.

(Title 18, United States Code, Sections 492, 982(a)(2) and 982(b)(1); Title 21, United States Code, Section 853(p); Title 28, United States Code, Section 2461(c))

A TRUE BILL

 /s/ 

/s/


FOREPERSON

By Alifandra Smith, Assistant U.S. Attorney
BREON PEACE
UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK