

2021R00618/ABJ

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA	:	Hon. Karen M. Williams
	:	
v.	:	Crim. No. 24-650
	:	
DEZHON MCCRAE	:	18 U.S.C. § 1349 18 U.S.C. § 1704
		18 U.S.C. § 1708 18 U.S.C. § 1028A
		18 U.S.C. § 1951

INFORMATION

The defendant having waived in open court prosecution by Indictment, the United States Attorney for the District of New Jersey charges:

COUNT 1
(Conspiracy to Commit Bank Fraud)

From on or about May 4, 2018, through in or around February 2020, in Gloucester County, in the District of New Jersey, and elsewhere, the defendant,

DEZHON MCCRAE,

did knowingly and intentionally conspire and agree with others to execute a scheme and artifice to defraud one or more financial institutions, as defined by 18 U.S.C. § 20, namely Victim Bank 1, Victim Bank 2, and others, the deposits of which were then insured by the Federal Deposit Insurance Corporation, and to obtain moneys, funds, assets, and other property owned by, and under the custody and control of, such financial institution, by means of materially false and fraudulent pretenses, representations, and promises, contrary to Title 18, United States Code, Section 1344.

In violation of Title 18, United States Code, Section 1349.

COUNT 2

(Conspiracy to Commit Bank Fraud)

From on or about May 11, 2022, through in or around July 27, 2022, in Burlington County, in the District of New Jersey, and elsewhere, the defendant,

DEZHON MCCRAE,

did knowingly and intentionally conspire and agree with others to execute a scheme and artifice to defraud one or more financial institutions, as defined by 18 U.S.C. § 20, namely Victim Bank 3, the deposits of which were then insured by the Federal Deposit Insurance Corporation, and to obtain moneys, funds, assets, and other property owned by, and under the custody and control of, such financial institution, by means of materially false and fraudulent pretenses, representations, and promises, contrary to Title 18, United States Code, Section 1344.

In violation of Title 18, United States Code, Section 1349.

COUNT 3

(Possession of Mail Key with Intent to Use Unlawfully)

On or about August 18, 2023, in Paulding County, in the Northern District of Georgia, and elsewhere, the defendant,

DEZHON MCCRAE,

did knowingly and unlawfully possess a key adopted by the United States Postal Service for use in any lock box, lock drawer, and other authorized receptacle for the deposit and delivery of mail matter, with the intent unlawfully and improperly to use, sell, and otherwise dispose of such key, and to cause such key to be unlawfully and improperly used, sold, and otherwise disposed of.

In violation of Title 18, United States Code, Section 1704.

COUNT 4

(Theft or Receipt of Stolen Mail Matter Generally)

On or about August 18, 2023, in Paulding County, in the Northern District of Georgia, and elsewhere, the defendant,

DEZHON MCCRAE,

knowingly bought, received, and concealed, and unlawfully had in his possession a letter, postal card, package, bag, and mail and any article and thing contained therein, which had been stolen, taken, embezzled and abstracted from a letter box, post office, mail receptacle, mail route and carrier, which was an authorized depository for mail matter, knowing the said letter to have been stolen, taken, embezzled and abstracted from an authorized depository for mail matter.

In violation of Title 18, United States Code, Section 1708.

COUNT 5

(Aggravated Identity Theft)

Between on or about June 29, ²⁰²³~~2024~~, and July 3, ²⁰²³~~2024~~, in Paulding County, in the Northern District of Georgia, and elsewhere, the defendant,

DEZHON MCCRAE,

did knowingly transfer, possess, and use, and aided and abetted the transfer, possession and use, without lawful authority, of a means of identification of another person during and in relation to a felony violation enumerated in 18 U.S.C. § 1028A(c), to wit, conspiracy to commit bank fraud, in violation of 18 U.S.C. § 1349, knowing that the means of identification belonged to another actual person.

In violation of Title 18, United States Code, Section 1028A(a)(1) and Section 2.

COUNT 6

(Conspiracy to Commit Hobbs Act Robbery)

Between on or about June 13, 2023, through on or about July 3, 2023, in Paulding County, in the Northern District of Georgia, and in Cumberland County, in the District of New Jersey, and elsewhere, the defendant,

DEZHON MCCRAE,

did knowingly and willfully combine, conspire, confederate, and agree with other persons to obstruct, delay, and affect commerce and the movement of articles and commodities in commerce by means of robbery, as the terms “commerce” and “robbery” are defined in Title 18, United States Code, Section 1951(b)(1) and (b)(3), that is, by participating in a plan to take property from the presence and custody of letter carriers with the United States Postal Service, against each such person’s will, by means of actual and threatened force, and fear of injury to such person.

In violation of Title 18, United States Code, Section 1951(a).

FORFEITURE ALLEGATIONS AS TO COUNTS 1 AND 2

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

2. As a result of committing the conspiracy offenses charged in Counts 1 and 2 of this Information, the defendant charged shall forfeit to the United States, pursuant to Title 18, United States Code, Sections 981(a)(1)(C) and 982(a)(2)(A), and Title 28, United States Code, Section 2461(c), any property, real or personal, said defendant obtained that constitutes or is derived from proceeds traceable to the offense charged in Counts 1 and 2 of this Information.

FORFEITURE ALLEGATIONS AS TO COUNTS 4 AND 6

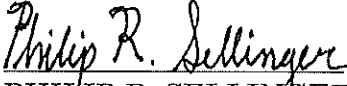
1. The allegations contained in Counts 4 and 6 of this Information are hereby realleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Sections 981(a)(1)(C), and Title 28, United States Code, Section 2461(c).

2. As a result of committing the offenses charged in Counts 4 and 6 of this Information, the defendant charged shall forfeit to the United States, pursuant to Title 18, United States Code, Sections 981(a)(1)(C), and Title 28, United States Code, Section 2461(c), any property, real or personal, said defendant obtained that constitutes or is derived from proceeds traceable to the offense charged in Counts 4 and 6 of this Information.

SUBSTITUTE ASSET PROVISION
(Applicable to All Forfeiture Allegations)

1. If any of the property described above, as a result of any act or omission of the respective defendant:
 - a. cannot be located upon the exercise of due diligence;
 - b. has been transferred to 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, Section 982(a)(1) and Title 28 United States Code, Section 2461(c), to seek forfeiture of any other property of such defendants up to the value of the forfeitable property described above.


PHILIP R. SELLINGER
United States Attorney

CASE NUMBER: _____

**United States District Court
District of New Jersey**

UNITED STATES OF AMERICA

v.

DEZHON MCCRAE

INFORMATION FOR

18 U.S.C. § 1349
18 U.S.C. § 1704
18 U.S.C. § 1708
18 U.S.C. § 1028A
18 U.S.C. § 1951

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FOR THE DISTRICT OF NEW JERSEY

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