UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon.

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:

: Criminal No. 18-

18 U.S.C. §§ 201(b)(2)(A) and (C)

: 18 U.S.C. § 981(a)(1)(C)

LEONARD GRESHAM : 28 U.S.C. § 2461

INFORMATION

The defendant having waived in open court prosecution by indictment, the United States

Attorney for the District of New Jersey charges:

- 1. At all times relevant to this Information:
- a. Defendant LEONARD GRESHAM was employed by the United States

 Postal Service ("USPS") as a mail carrier, and was a public official within the meaning of 18

 U.S.C. § 201(a)(1).
- b. Defendant LEONARD GRESHAM delivered mail on a postal route located in Newark, New Jersey, and was employed at the USPS Springfield Station.
 - c. Individual #1 was a resident of Paterson, New Jersey.
- d. Individual #2 was a resident on defendant LEONARD GRESHAM's postal route in Newark.
- e. Under the policies and procedures of the USPS for delivery of parcels sent by United States mail, letter carriers are required to deliver parcels to the address noted on the mailing label (the "recipient address"). If an individual resides or works at the recipient address or is the addressee listed with the recipient address, the letter carrier is permitted to give the parcel to such individual at the recipient address. However, the letter carrier is not permitted to

deliver the parcel to such individual at a location that is different from the recipient address.

Moreover, while the addressee of a parcel is permitted to pick up the parcel at the officially designated windows of the post office station holding the parcel, the addressee may not be given parcels in non-designated pick-up areas of the post office.

- 2. From in or about October 2014 to in or about September 2017, defendant LEONARD GRESHAM received a total of approximately \$14,900 in cash payments from certain individuals in Newark in exchange for personally delivering certain parcels containing illegal narcotics sent through the United States mail to these individuals.
 - 3. It was part of the scheme that:
 - a) the parcels that defendant LEONARD GRESHAM personally delivered in exchange for cash were not addressed to the actual recipient and had fictitious return names and addresses on the mailing labels.
 - b) from in or about October 2014 to in or about March 2017, defendant LEONARD GRESHAM was contacted by Individual #1 on multiple occasions to request personal deliveries of certain parcels expected to arrive by United States mail at the USPS Springfield Station, which defendant LEONARD GRESHAM then removed from the stream of delivery while on duty and delivered to Individual #1 at locations in Newark other than the recipient address. Each time that defendant LEONARD GRESHAM made such a delivery, he accepted a payment in cash of between approximately \$50 and \$200.
 - c) from in or about October 2014 to in or about September 2017, defendant LEONARD GRESHAM was contacted by Individual #2 on multiple occasions to request personal deliveries of certain parcels expected to arrive via United States mail at the USPS Springfield Station, which defendant LEONARD GRESHAM then removed from the stream of delivery while on duty and personally delivered to Individual #2 at locations in Newark other than the recipient address. Each time that defendant LEONARD GRESHAM made such a personal delivery, he accepted a payment in cash of between approximately \$50 and \$100.

4. From in or about October 2014 to in or about September 2017, in Essex County, in the District of New Jersey, and elsewhere, defendant

LEONARD GRESHAM

being a public official, directly and indirectly, did corruptly demand, seek, receive, accept, and agree to receive and accept things of value, namely, approximately \$14,900 in cash, in return for being influenced in the performance of official acts and for being induced to do acts in violation of his official duties.

In violation of Title 18, United States Code, Sections 201(b)(2)(A) and (C).

FORFEITURE ALLEGATION

- 1. The allegations contained in all paragraphs of this Information are hereby realleged and incorporated by reference for the purpose of noticing forfeiture pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).
- 2. The United States hereby gives notice to defendant LEONARD GRESHAM that, upon conviction of the bribery offense in violation of Title 18, United States Code, Section 201(b)(2)(A) and (C), charged in this Information, the United States 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), of any and all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of such offense, including, but not limited to \$14,900 in United States currency.
- 3. If by any act or omission of the defendant LEONARD GRESHAM, any of the property subject to forfeiture described above:
 - 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 28, United States Code, Section 2461(c), to seek forfeiture of any other property of defendant LEONARD GRESHAM up to the value of the above-described forfeitable property.

eRAIG CARPENITO
United States Attorney

CASE	NUMBER:	18-

United States District Court District of New Jersey

UNITED STATES OF AMERICA

v.

LEONARD GRESHAM

INFORMATION FOR

18 U.S.C. §§ 201(b)(2)(A) and (C) 18 U.S.C. § 981(a)(1)(C) 28 U.S.C. § 2461(c)

CRAIG CARPENITO

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