

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA : Hon.
 :
 v. : Criminal No. 22-
 :
 :
 DEVONTAE STOKES : 18 U.S.C. § 1349
 :

INFORMATION

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

BACKGROUND

1. At various times relevant to this Information:
 - a. Defendant DEVONTAE STOKES was an inmate at FCI Fort Dix, a federal correctional institutional with an adjacent satellite camp located in Fort Dix, New Jersey.
 - b. On or about March 27, 2020, the Coronavirus Aid, Relief, and Economic Security Act (the “CARES Act”) was signed into law. The CARES Act created a new temporary federal unemployment insurance program called Pandemic Unemployment Assistance (“PUA”). PUA provided unemployment insurance benefits (“UIBs”) for individuals who were not eligible for other types of unemployment (e.g., the self-employed, independent contractors, gig economy workers). The CARES Act also created a new temporary federal program called Federal Pandemic Unemployment Assistance (“FPUC”) that

provided an additional \$600 weekly benefit to those eligible for PUA and regular UIBs.

c. Subject to certain eligibility requirements, a person who was unemployed, but who used to be employed by an employer in a given state could apply to receive UIBs from that state.

d. Each state administered the above UIB programs through a State Workforce Agency (“SWA”).

THE CONSPIRACY

2. From at least in or around April 2020 through in or around November 2020, in the District of New Jersey and elsewhere, the defendant,

DEVONTAE STOKES,

did knowingly and intentionally conspire with others to devise and intend to devise a scheme and artifice to defraud individuals, and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, and, for the purpose of executing and attempting to execute such scheme and artifice to defraud, did transmit and cause to be transmitted by means of wire communications in interstate and foreign commerce certain writings, signs, signals, pictures, and sounds, including a November 6, 2020, text message from a location in New Jersey to a location outside New Jersey, contrary to Title 18, United States Code, Section 1343.

GOAL OF THE CONSPIRACY

3. The goal of the conspiracy was for STOKES and his conspirators to enrich themselves by obtaining money from states through the submission of fraudulent UIB claims.

MANNER AND MEANS OF THE CONSPIRACY

4. It was part of the conspiracy that:

a. STOKES and his conspirators obtained personal identification information ("PII"), including names, dates of birth, and social security numbers belonging to other individuals without those individuals' knowledge and consent.

b. STOKES and his conspirators sent each other wire communications concerning submitting fraudulent UIB applications and receiving proceeds resulting from the fraudulent submissions, including a text message on November 6, 2020, from STOKES, who was located in New Jersey, to a conspirator who was located outside of New Jersey.

c. STOKES and his conspirators caused fraudulent applications to be made to SWAs for UIBs.

d. STOKES and his conspirators obtained more than \$140,000 from the SWAs in response to the fraudulent UIB applications.

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

FORFEITURE ALLEGATION

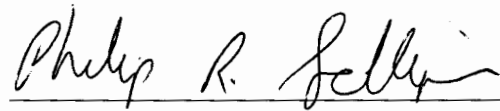
1. The allegations contained in this Information are incorporated by reference as though set forth in full herein for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c).

2. Upon conviction of the offense charged in this Information, the government will seek forfeiture from defendant STOKES, in accordance with Title 28, United States Code, Section 2461(c), and Title 18, United States Code, Section 981(a)(1)(C), of any and all property, real or personal, that constitutes or is derived from proceeds traceable to the violations of Title 18, United States Code, Section 1349.

3. If by any act or omission of defendant STOKES any of the property subject to forfeiture herein:

- 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 subdivided 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 STOKES up to the value of the property described in this forfeiture allegation.

A handwritten signature in cursive script, reading "Philip R. Sellinger", written over a horizontal line.

PHILIP R. SELLINGER
UNITED STATES ATTORNEY