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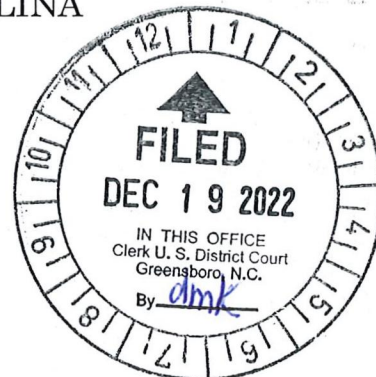
IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA

UNITED STATES OF AMERICA :

v. :

MARCUS ANTHONY FLETCHER :

1:22CR 399-1



The Grand Jury charges:

Background

A. At all times material herein, MARCUS ANTHONY FLETCHER was a resident of Durham County, North Carolina, within the Middle District of North Carolina.

B. At all times material herein, MARCUS ANTHONY FLETCHER used a house located at 1307 Timothy Avenue, Durham, North Carolina, as a location to which he directed fraudulently obtained goods to be mailed.

C. At all times material herein, Business 1 sold various firearm parts online.

D. At all times material herein, Business 2 also sold various firearm parts online.

E. At all times material herein, Business 3 also sold various firearm parts online.

F. At all times material herein, Business 4 also sold various firearm parts online.

The Fraudulent Scheme

1. From in or about October 2021, continuing up to and including in or about July 2022, the exact dates to the Grand Jurors unknown, in the County of Durham, in the Middle District of North Carolina, MARCUS ANTHONY FLETCHER devised and intended to devise a scheme to defraud victims out of money and property, through material false pretenses, representations, and promises, by using stolen credit card numbers to make fraudulent purchases of firearm parts, all under the false pretense and representation that such transactions were authorized, when in fact they were being conducted by MARCUS ANTHONY FLETCHER for his own benefit and gain, such scheme and artifice to defraud making use of the United States mails and commercial carriers.

2. It was a part of the scheme and artifice to defraud that MARCUS ANTHONY FLETCHER fraudulently obtained credit card numbers belonging to victims and used those credit card numbers to purchase firearm parts online from various businesses, including but not limited to:

a. MARCUS ANTHONY FLETCHER obtained the Capital One credit card number ending in 1567 belonging to C.O. and used that credit card number to fraudulently purchase firearm parts from Business 1.

b. MARCUS ANTHONY FLETCHER obtained the Bank of America credit card number ending in 3264 belonging to G.B. and used that credit card number to fraudulently purchase firearm parts from Business 2.

c. MARCUS ANTHONY FLETCHER obtained the American Express credit card ending in 1009 belonging to J.V. and used that credit card number to fraudulently purchase, or attempt to purchase, firearm parts from Business 3 and Business 4.

3. It was a further part of the scheme and artifice to defraud that MARCUS ANTHONY FLETCHER directed that certain fraudulent purchases be shipped and delivered to 1307 Timothy Avenue, Durham, North Carolina so that FLETCHER could retrieve such fraudulent purchases.

4. It was a further part of the scheme and artifice to defraud that MARCUS ANTHONY FLETCHER changed the delivery instructions on a fraudulent purchase in J.V.'s name and using J.V.'s credit card and directed that the package be held for pick-up at a United Parcel Service facility.

COUNT ONE
(Mail Fraud)

5. Paragraphs 1 through 4 are incorporated by reference as if fully set forth herein.

6. On or about October 6, 2021, in the County of Durham, in the Middle District of North Carolina, MARCUS ANTHONY FLETCHER, for the

purpose of executing the above-described scheme and artifice to defraud, and attempting to do so, knowingly caused to be delivered by United States Mail according to the directions thereon, a package addressed to an individual whose initials are C.O., 1307 Timothy Avenue, North Carolina, containing firearm parts fraudulently ordered and purchased by MARCUS ANTHONY FLETCHER in the name of C.O.

All in violation of Title 18, United States Code, Sections 1341.

COUNT TWO
(Aggravated Identity Theft)

7. On or about October 6, 2021, in the County of Durham, in the Middle District of North Carolina, MARCUS ANTHONY FLETCHER, during and in relation to a felony enumerated in Title 18, United States Code, Section 1028A(c), to wit, mail fraud, in violation of Title 18, United States Code, Section 1341, as alleged in Count One and incorporated by reference herein, knowingly did possess and use, without lawful authority, a means of identification of another person, that is, the name and credit card number belonging to C.O.

All in violation of Title 18, United States Code, Section 1028A(a)(1).

COUNT THREE
(Mail Fraud)

8. Paragraphs 1 through 4 are incorporated by reference as if fully set forth herein.

9. On or about October 12, 2021, in the County of Durham, in the Middle District of North Carolina, MARCUS ANTHONY FLETCHER, for the purpose of executing the above-described scheme and artifice to defraud, and attempting to do so, knowingly caused to be delivered by United States Mail according to the directions thereon, a package addressed to an individual whose initials are G.B., 1307 Timothy Avenue, Durham, North Carolina containing firearm parts fraudulently ordered and purchased by MARCUS ANTHONY FLETCHER in the name of G.B.

All in violation of Title 18, United States Code, Section 1341.

COUNT FOUR
(Aggravated Identity Theft)

10. On or about October 12, 2021, in the County of Durham, in the Middle District of North Carolina, MARCUS ANTHONY FLETCHER, during and in relation to a felony enumerated in Title 18, United States Code, Section 1028A(c), to wit, mail fraud, in violation of Title 18, United States Code, Section 1341, as alleged in Count Three and incorporated by reference herein, knowingly did possess and use, without lawful authority, a means of identification of another person, that is, the name and credit card number belonging to G.B.

All in violation of Title 18, United States Code, Section 1028A(a)(1).

COUNT FIVE
(Mail Fraud)

10. Paragraphs 1 through 4 are incorporated by reference as if fully set forth herein.

11. On or about June 29, 2022, in the County of Durham, in the Middle District of North Carolina, MARCUS ANTHONY FLETCHER, for the purpose of executing the above-described scheme and artifice to defraud, and attempting to do so, knowingly caused to be delivered by commercial interstate carrier according to the directions thereon, a package addressed to an individual whose initials are J.V., 128 Morningside Drive, Durham, North Carolina containing firearm parts fraudulently ordered and purchased by MARCUS ANTHONY FLETCHER in the name of J.V.

All in violation of Title 18, United States Code, Section 1341.

COUNT SIX
(Aggravated Identity Theft)


12. On or about June 29, 2022, in the County of Durham, in the Middle District of North Carolina, MARCUS ANTHONY FLETCHER, during and in relation to a felony enumerated in Title 18, United States Code, Section 1028A(c), to wit, mail fraud, in violation of Title 18, United States Code, Section 1341, as alleged in Count Five and incorporated by reference herein, knowingly did possess and use, without lawful authority, a means of

identification of another person, that is, the name and credit card number of an individual whose initials are J.V.


All in violation of Title 18, United States Code, Section 1028A(a)(1).

DATED: December 19, 2022

SANDRA J. HAIRSTON
United States Attorney


BY: ASHLEY E. WAID
Assistant United States Attorney

A TRUE BILL: 


FOREPERSON