JTM MJM: USAO# 2020R00267

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

UNITED STATES OF AMERICA	*	RDB-20-0183
	*	**CRIMINAL NO.**
v.	*	
	*	**(Conspiracy, 18 U.S.C. § 371; Mail**
NICHOLAS MILANO WHITE,	*	**Theft, 18 U.S.C. § 1708; Aiding and**
CEDRIC JONATHAN MCNEAL	*	**Abetting, 18 U.S.C. § 2; Forfeiture, 18**
PARKER, and	*	**U.S.C. § 981, 21 U.S.C. § 853(p), 28**
DOMINIC JERRY ROBINSON,	*	**U.S.C. § 2461(c))**
	*	
Defendants.	*	

******

INDICTMENT

COUNT ONE
(Conspiracy)

The Grand Jury for the District of Maryland charges that:

Introduction

At times material to this Indictment:

1. **NICHOLAS MILANO WHITE ("WHITE")**, **CEDRIC JONATHAN MCNEAL PARKER ("MCNEAL PARKER")**, and **DOMINIC JERRY ROBINSON ("ROBINSON")** resided in the Baltimore metropolitan area of the State of Maryland.

The United States Postal Service

2. The United States Postal Service ("USPS") was an agency of the United States federal government that provided postal service in the United States. USPS operated post offices and stationed mail collection boxes at post offices and other locations in the State of Maryland and throughout the United States.

3. USPS collected postal mail deposited by postal customers into mail collection boxes and other authorized depositories, processed the mail for delivery to other postal customers

at designated addresses and post office boxes, and delivered the mail to those addresses and post office boxes.

4. USPS mail collection boxes were locked in order to maintain the security of postal mail deposited into them. USPS used Arrow keys to access postal mail deposited into locked collection boxes for processing and delivery to designated addresses and post office boxes.

Victim Postal Customers

5. The postal customers identified herein as P.P., A.T., G.C., E.S., and E.Q. were residents of the State of Maryland.

6. The Internal Revenue Service (the "IRS") was an agency of the United States federal government and bureau of the United States Department of the Treasury. The IRS collected, by postal mail and other means, payments of federal income taxes in the form of checks and other forms of payment, payment vouchers, federal tax returns, and other documents in order to administer and enforce federal tax laws. The IRS directed taxpayers to mail tax returns and payments to particular addresses and post office boxes located throughout the United States.

7. The Office of the Comptroller of Maryland was an agency of the Maryland state government that was responsible for administering Maryland tax laws. The Revenue Administration Division was a division within the Comptroller's Office that received state tax returns and payments by postal mail and other means.

8. Delaware Electric Cooperative was an electricity distribution company that collected payment for electric utility services by postal mail and other means.

The Conspiracy

9. Beginning on or about February 24, 2020, and continuing thereafter until on or about March 8, 2020, in the District of Maryland, the defendants,

**NICHOLAS MILANO WHITE,
CEDRIC JONATHAN MCNEAL PARKER, and
DOMINIC JERRY ROBINSON,**

knowingly and willfully conspired and agreed together, with each other and with others known and unknown to the Grand Jury, to commit offenses against the United States, that is, to steal, take, and abstract, and to attempt so to obtain, from and out of any post office, letter box, mail receptacle, and other authorized depository for mail matter, any letter, postal card, package, bag, and mail, in violation of Title 18, United States Code, Section 1708.

Manner and Means of the Conspiracy

10. It was part of the conspiracy that the defendants would steal and attempt to steal pieces of postal mail from multiple USPS mail collection boxes stationed in Maryland and to assist each other in doing so.

11. It was further part of the conspiracy that the defendants would travel by vehicle to particular locations in Maryland where USPS mail collection boxes were stationed.

12. It was further part of the conspiracy that one or more of the defendants would exit the vehicle where a USPS mail collection box was located, open the collection box, remove mail pieces contained within the collection box, and take the mail pieces with them back inside the vehicle.

13. It was further part of the conspiracy that the defendants would depart the location of the USPS mail collection box with the stolen mail pieces and proceed to the locations of other mail collection boxes in order to commit further thefts.

Overt Acts

14. In furtherance of the conspiracy and to effect the objects of the conspiracy, the following overt acts, among others, were committed in the District of Maryland:

a. Between on or about February 24, 2020, and March 8, 2020, **WHITE** possessed at least one USPS Arrow key capable of unlocking USPS mail collection boxes stationed in Maryland.

b. On or about March 1, 2020, **WHITE** possessed a list of street intersections and addresses in the Baltimore metropolitan area where USPS mail collection boxes were stationed and relayed that list to **ROBINSON**.

c. On or about March 5, 2020, **WHITE** sent text messages to **MCNEAL PARKER** stating, "Me yu n nicc goin hit the boxes Friday Saturday and go up that b---h" and "Sunday morning," to which **MCNEAL PARKER** responded, "Okay."

d. On or about the early morning of Sunday, March 8, 2020, **WHITE**, **MCNEAL PARKER**, and **ROBINSON** travelled in a white sedan vehicle registered to **ROBINSON** to a USPS post office located in Rosedale, Maryland (the "Rosedale Post Office").

e. On the same date, **MCNEAL PARKER** exited the vehicle near USPS mail collection boxes stationed at the Rosedale Post Office, opened a collection box, removed mail pieces from the collection box, and reentered the vehicle.

f. On the same date, **WHITE**, **MCNEAL PARKER**, and **ROBINSON** departed from the Rosedale Post Office and travelled to USPS post offices located in Parkville, Maryland; Towson, Maryland (the "Loch Raven Post Office"); and Riderwood, Maryland (the "Riderwood Post Office").

g. On the same date, **WHITE, MCNEAL PARKER**, and **ROBINSON** stole, and assisted each other in stealing, mail pieces from USPS collection boxes located at the Loch Raven Post Office and the Riderwood Post Office, including mail addressed to the IRS and others.

18 U.S.C. § 371

COUNTS TWO THROUGH FOUR
(Mail Theft)

The Grand Jury for the District of Maryland further charges that:

1. The allegations set forth in Paragraphs 1 through 14 of Count One are incorporated by reference here.

2. On or about March 8, 2020, in the District of Maryland, the defendants,

NICHOLAS MILANO WHITE,
CEDRIC JONATHAN MCNEAL PARKER, and
DOMINIC JERRY ROBINSON,

did steal, take, and abstract, and attempt so to obtain, from and out of a post office, letter box, mail receptacle, and other authorized depository for mail matter, any letter, postal card, package, bag, and mail; to wit, the defendants stole mail pieces described below from USPS mail collection boxes stationed at the following USPS post offices:

Count	**USPS Post Office**	**Sender**	**Intended Recipient**
2	Rosedale Post Office	P.P.	Comptroller of Maryland, Revenue Administration Division, Annapolis, MD
3	Loch Raven Post Office	A.T.	Department of the Treasury, Internal Revenue Service, Ogden, UT
		G.C.	Internal Revenue Service Center, Louisville, KY
4	Riderwood Post Office	E.S.	Internal Revenue Service Center, Louisville, KY
		E.Q.	Delaware Electric Cooperative, Greenwood, DE

18 U.S.C. § 1708
18 U.S.C. § 2

FORFEITURE

The Grand Jury for the District of Maryland further charges that:

1. Pursuant to Fed. R. Crim. P. 32.2, notice is hereby given to the defendant that, in the event of the defendant's conviction on Counts One through Four of this Indictment, the United States will seek forfeiture as a part of any sentence, in accordance with 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c).

2. Upon conviction of the offenses charged in Counts One through Four of this Indictment, the defendants,

NICHOLAS MILANO WHITE,
CEDRIC JONATHAN MCNEAL PARKER, and
DOMINIC JERRY ROBINSON,

shall forfeit to the United States, pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), any and all property, real or personal, constituting, or derived from, proceeds traceable to such offense.

3. If, as a result of any act or omission of the defendant, any of the property described above as being subject to forfeiture:

a. cannot be located upon the exercise of due diligence;
b. has been transferred or sold to, or deposited with, a third person;
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 that cannot be subdivided without difficulty;

the United States shall be entitled to forfeiture of substitute property of the defendant pursuant to 21 U.S.C. § 853(p), as incorporated by 28 U.S.C. § 2461(c).

18 U.S.C. § 981(a)(1)(C)
21 U.S.C. § 853(p)
28 U.S.C. § 2461(c)

Robert K Hur /MJP
Robert K. Hur
United States Attorney

SIGNATURE REDACTED

July 8, 2020
Date