



UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

TRAVIS McKENZIE,

Defendant.

No. 2:22-cr-00268-SB

I N F O R M A T I O N

[18 U.S.C. § 1341: Mail Fraud; 18 U.S.C. § 1708: Possession of Stolen Mail; 18 U.S.C. §§ 1028(a)(7), (b)(1)(D): Unlawful Transfer, Possession, and Use of Means of Identification]

The United States Attorney charges:

COUNT ONE

[18 U.S.C. §§ 1341, 2(b)]

A. THE SCHEME TO DEFRAUD

1. Beginning in or around August 2020, and continuing through at least in or around June 2021, in Los Angeles County, within the Central District of California, and elsewhere, defendant TRAVIS McKENZIE, together with others known and unknown to the United States Attorney, each aiding and abetting the other, knowingly and with intent to defraud, devised, participated in, and executed and attempted to execute a scheme to defraud the California Employment Development Department ("EDD"), as to material matters, and to obtain money and property from California EDD, by means of material false

1 and fraudulent pretenses, representations, and promises, and the
2 concealment of material facts.

3 2. The scheme to defraud operated, in substance, as follows:

4 a. Defendant McKENZIE would file fraudulent applications
5 for EDD unemployment benefits in other people's names using mailing
6 addresses under the control of his and his co-schemers.

7 b. Based upon those fraudulent applications, California
8 EDD would mail debit cards and other correspondence to the addresses
9 listed on the applications.

10 c. After California EDD mailed out debit cards or other
11 correspondence to those addresses, defendant McKENZIE's co-schemer,
12 who was a U.S. Postal Service mail carrier, would then intercept and
13 steal that mail and provide it to defendant.

14 d. Defendant McKENZIE would also use some of those stolen
15 EDD debit cards in the names of others to withdraw cash from ATMs and
16 make purchases at high end retailers.

17 B. USE OF THE MAILS

18 3. On or about December 2, 2020, within the Central District
19 of California, and elsewhere, defendant McKENZIE, for the purpose of
20 executing and attempting to execute the above-described scheme to
21 defraud, willfully caused an item to be placed in an authorized
22 depository for mail matter to be sent and delivered by the USPS
23 according to the directions thereon, specifically, a letter from
24 California EDD addressed to victim A.J. at Valencia, California,
25 which contained an EDD debit card in the name of A.J.

COUNT TWO

[18 U.S.C. § 1708]

4. On or about May 20, 2021, in Los Angeles County, within the Central District of California, defendant TRAVIS McKENZIE unlawfully possessed mail and mail matter that had been stolen and taken from the United States mail, namely, approximately 317 pieces of mail and mail matter addressed to various individuals within Los Angeles County and elsewhere, and at that time and place, defendant McKENZIE knew that said mail and mail matter were stolen.

COUNT THREE

[18 U.S.C. §§ 1028(a)(7), (b)(1)(D)]

5. On or about May 20, 2021, in Los Angeles County, within the Central District of California, defendant TRAVIS McKENZIE knowingly transferred, possessed, and used, without lawful authority, means of identification of another person, namely, the name and debit card number of A.J., in defendant McKENZIE's residence in Valencia, California, with the intent to commit, to aid and abet the commission of, and in connection with the commission of, a violation of Federal law, namely, Mail Fraud, in violation of Title 18, United States Code, Section 1341, with said transfer, possession, and use affecting interstate and foreign commerce and resulting in obtaining anything of value aggregating \$1,000 or more during any one year period.

TRACY L. WILKISON
United States Attorney



SCOTT M. GARRINGER
Assistant United States Attorney
Chief, Criminal Division

BENJAMIN R. BARRON
Assistant United States Attorney
Chief, Santa Ana Branch Office

BRADLEY E. MARRETT
Assistant United States Attorney
Deputy Chief, Santa Ana Branch
Office

CHARLES E. PELL
Assistant United States Attorney
Santa Ana Branch Office