IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
v.	)	
	)	Criminal Action No. 23-78
CRANDALL SPEIGHTS,	)	
	)	
Defendant.	)	

GOVERNMENT'S SENTENCING MEMORANDUM

Crandall Speights has spent his entire adult life defrauding and stealing from others. Beginning at age 21, from 2003 – 2019, he amassed fourteen convictions for theft from vehicles, burglary, credit card-related fraud, identity theft, theft by deception, and forgery. From 2019 - 2021, he committed one of the fraud schemes to which he pled guilty here, stealing checks out of residential mailboxes, altering them, and depositing them into accounts he controlled. From 2020 – 2021, Speights committed the additional wire fraud and money laundering offenses to which he pled guilty, by submitting six fraudulent COVID-19 relief loans, depositing the funds into accounts he controlled, and moving the money to conceal its fraudulent nature. In 2024, while on supervised release in this matter, Speights fled to New Jersey and continued stealing mail, amassing identification cards, and altering stolen checks. Between the mail theft, COVID-19 relief fraud, and additional checks he stole while on supervised release, Speights defrauded others out of approximately $949,010. Speights has committed numerous fraudulent acts over the last 22 years with one singular purpose: to enrich himself. While no motive excuses fraud, some motives are particularly egregious. Speights spent his fraud proceeds on jewelry and furs.

His relentless pursuit of a luxurious lifestyle and total disregard for his victims warrants a significant sentence. The government recommends a sentence of 87 months, at the top of the Guidelines range.[1]

I. The Nature and Circumstances of the Offense

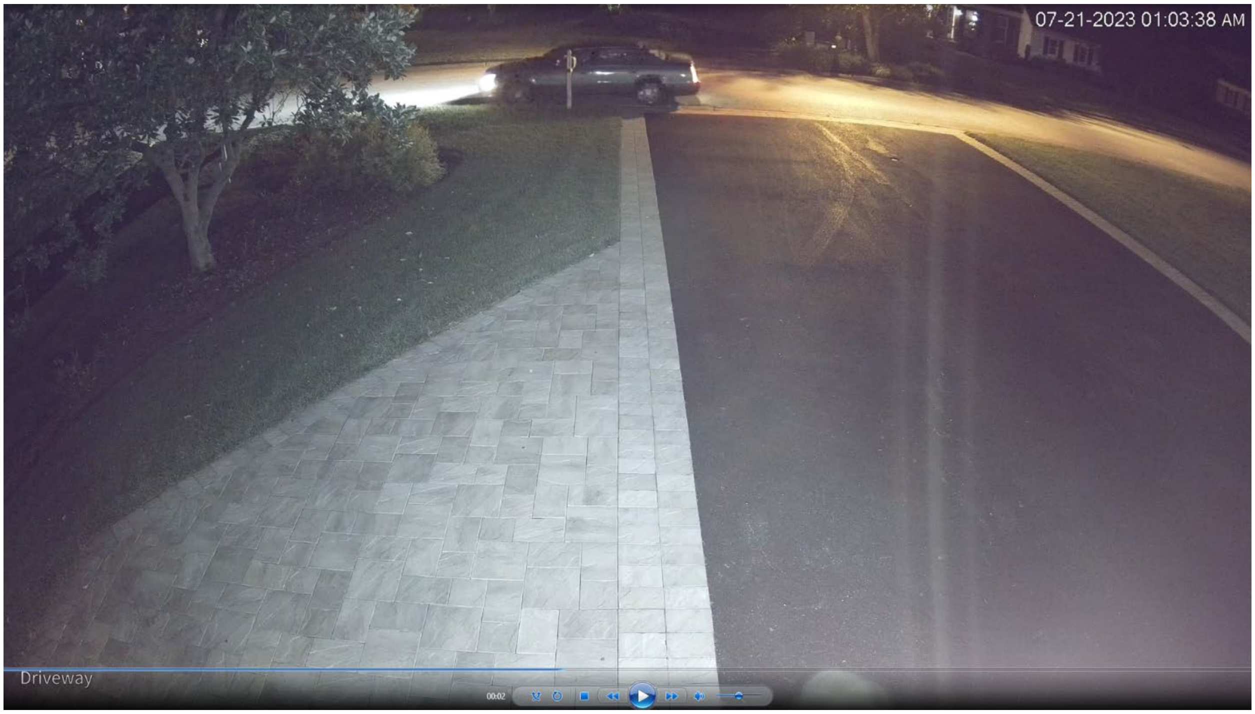
Speights' fraudulent acts are myriad, span multiple years, and impacted numerous victims. The Court is all to familiar with the ways that COVID-19 relief fraud looted a program intended to aid small businesses struggling during the pandemic. The Court is likewise familiar with the financial loss sustained by banks when they fund checks which are later revealed to be fraudulent. The government herein focuses on additional layers of harm Speights inflicted on others beyond those most typically seen in a fraud case. These additional, atypical layers of harm have guided the government's recommendation of a sentence at the top of the Guidelines range.

First, not all of the individuals whose checks were stolen out of their mailboxes had their losses reimbursed by banks. Eight families or small businesses personally sustained the loss of their stolen checks. PSR ¶ 32. Some of those losses were particularly significant. J.D., for example, is an individual who personally lost $101,453 due to Speights' fraud. *Id.*

Second, those victims sustained not only financial loss, but loss of a sense of safety. Speights's scheme reached into the space where a person should feel most secure – their homes. He drove around quiet neighborhoods at night looking for raised flags on mailboxes, slowed down, reached in, and took whatever was inside.

[1] The government includes Sealed Attachment A with this filing, as it does in all cases.

When Speights found a particularly lucrative stack of mail, he returned to the same home again. At least one victim family became so concerned by Speights' repeat drive-bys that they took videos of Speights' car and provided them to law enforcement. A still frame from one such video is below:



Speights admitted to stealing mail from this victim in his post-arrest statement. *See* Ex. 1 (Speights Post-Arrest Statement) at 42.

Speights forced victims to live with the uncertainty of when he would return and what he might do next. They had no way to know whether Speights was content to loot their mailboxes or whether he would escalate to home invasion – a reasonable fear, given Speights' multiple burglary convictions. His offenses had real, harmful impacts on his victims beyond financial loss.

Third, Speights recruited Quinton Bonds, an ostensible friend, into his PPP fraud scheme. Speights' communications with Bonds leave no doubt that he was the mastermind and used even loved ones for his own personal gain, regardless of what harm might befall them. As shown in the below excerpts from a WhatsApp conversation,[2] Bonds expressed reluctance to call the bank to answer questions about fraudulent loan proceeds deposited into his account, but Speights urged that he needed to call the bank "asap" to convince them the fraud proceeds were legitimate. Bonds was nervous that he wouldn't know the answers to the bank's questions, and Speights encouraged him every step of the way – telling Bonds what to expect and even offering to play his "accountant" and join the call if necessary.

Date	Time	Sender	Recipient	Message
4/5/2021	4:21 p.m.	Bonds	**Speights**	I don't have to call back or even speak to her if I don't feel like it right?
4/5/2021	4:25 p.m.	**Speights**	Bonds	Open it
4/5/2021	4:25 p.m.	**Speights**	Bonds	She may ask about the money
4/5/2021	4:26 p.m.	**Speights**	Bonds	She may ask if you were expecting the $
4/5/2021	4:26 p.m.	**Speights**	Bonds	Just call
4/5/2021	4:27 p.m.	**Speights**	Bonds	Remember the amount of the deposit and your company name is SANTOLUBES manufacturing llc
4/5/2021	4:30 p.m.	**Speights**	Bonds	They did that to me and they want to make sure you were expecting the $
				. . .
4/5/2021	4:42 p.m.	**Speights**	Bonds	Tell her you had tried to open a business at the oceans first but was unsuccessful because of covid and let her know that you have been very busy.
				. . .
4/5/2021	4:55 p.m.	Bonds	**Speights**	Ima call

[2] The complete WhatsApp conversation is attached hereto as Exhibit 2.

4/5/2021	4:55 p.m.	**Speights**	Bonds	You have to call
4/5/2021	4:55 p.m.	Bonds	**Speights**	And I'm just the signer for the account for santolubes again shall she ask?
4/5/2021	4:55 p.m.	**Speights**	Bonds	You have to say u own it
4/5/2021	4:55 p.m.	Bonds	**Speights**	The business owner?
4/5/2021	4:56 p.m.	**Speights**	Bonds	Yes
4/5/2021	4:56 p.m.	Bonds	**Speights**	Okay what else should I be prepared to speak to?
4/5/2021	4:56 p.m.	Bonds	**Speights**	I don't have the documents in front of me
4/5/2021	4:56 p.m.	Bonds	**Speights**	Should I call when I get off when I have the papers?
4/5/2021	4:56 p.m.	**Speights**	Bonds	Call asap
4/5/2021	4:57 p.m.	**Speights**	Bonds	You HAVE to always call the bank back
				. . .
4/5/2021	4:59 p.m.	Bonds	**Speights**	And again I don't even know when the company was formed or anything about it so I'm not feeling prepared to answer a side cle [sic] damn question they may have for me on top of I'm at work alone with clients right now I'm not prepared to call
4/5/2021	5:03 p.m.	**Speights**	Bonds	Ok
4/5/2021	5:03 p.m.	Bonds	**Speights**	What are they gonna ask and what am I needing to know shall they ask because if I call now and they have questions it's going to be even more suspicious when I don't know
				. . .
4/5/2021	5:07 p.m.	**Speights**	Bonds	If needbe call on 3way with me. Tell them you have your accountant on the phone with you

The Court presided over Bonds' sentencing, during which Bonds recounted the life-altering night he spent in prison after his arrest for his role in this fraud scheme.

See United States v. Bonds, 23-CR-85, Minute Entry Dec. 16, 2024 (Sentencing). The ramifications of Speights recruiting Bonds were devastating for him. To be sure, Bonds agreed to participate in this fraud scheme of his own free will, stood to benefit from it, and rightly bore responsibility for his own choices. But Speights' willingness to recruit a friend into a fraud scheme shows the callousness with which he operated. Everyone, even supposed loved ones, was a tool for Speights' enrichment.

And all of this harm that Speights caused – to the government and financial institutions, to victims both financially and mentally, and to his own friend – was for his own gain. Between his bank fraud, COVID-19 relief fraud, and the additional mail thefts he committed after absconding from pretrial supervision, Speights amassed approximately $949,010. He spent it, in his own words, "just lighting it up" at "the casino" and spending it on "materialistic stuff" like "over $100,000" in "furs" and "another half a million" on "jewelry." Ex. 1 at 57-58.[3] Law enforcement seized over 40 pieces of jewelry from Speights' home with a total appraised value of approximately $477,705.00. Ex. 3 (Appraisals for Administrative Forfeiture). That jewelry includes an 18-karat gold, diamond, and sapphire ring valued at $75,000; a 2.75-karat loose diamond valued at $50,000; and a 1- karat gold bracelet valued at $102,900. *Id.* Law enforcement also seized 11 fur coats, shawls, and hats with a total appraised value of approximately $56,250. *Id.* In addition to those items, $62,232 in cash was seized from Speights' home. Speights' greed at the expense of everyone around him is serious and warrants a significant sentence.

[3] Speights asserted that some of the furs and jewelry were given to him, but also admitted they weren't purchased with "legit money." Ex. 1 at 59-60. They have been administratively forfeited by the United States Postal Inspection Service.

II. Speights' History and Characteristics

The bank fraud (tied to mail theft) and wire fraud and money laundering (tied to COVID-19 relief fraud) to which Speights pled guilty are by no means his first forays into crime. From the age of 20, Speights has engaged in a near-relentless stream of fraud, deception, and theft. The details of those offenses reveal that Speights has long been motivated by a pursuit of luxury and a total disregard for his impact on others. Take, for example, his 2003 conviction for receiving stolen property. PSR ¶ 74. Speights sustained that conviction after stealing a Lexus and attempting to steal a Jaguar. *Id.* ¶ 75. Two years later, Speights pled guilty to access device fraud after using a stolen access device to purchase a Louis Vuitton handbag, a men's diamond ring, a Cuban link gold bracelet, leather goods, and Gucci shoes. *Id.* ¶ 88. And he was convicted five times from 2009 – 2019 related to theft of credit cards and checks. PSR ¶¶ 91 (2009 conviction for identity theft), 96 (2012 conviction for illegal possession of credit cards), 100 (2014 conviction for credit card crime), 102 (2015 conviction for credit card crime), 107 (2019 conviction for stealing and depositing checks).

Nor were the instant offenses the last of Speights' crimes. As the Court knows, Speights absconded from pretrial supervision for eight months. PSR ¶ 17. He was found in possession of numerous social security cards, identification cards, checks, and bank cards in other people's names. *Id.* ¶ 18. The face value of the checks in his apartment at the time of his arrest was $53,760.99. *Id.* ¶ 30.

[redacted]

[redacted]

Speights' behavior for his entire adult life leaves no doubt that he is committed to defrauding others for his own personal gain. His greed is seemingly insatiable, he is unwilling to work a legitimate job to fund the lifestyle he desires, and he has no regard for the people he hurts along the way. A significant sentence is necessary to reflect his history and characteristics.

III. The Need to Promote General and Specific Deterrence

The most significant sentences Speights has faced so far are an aggregate three years in prison for multiple offenses in 2003 (PSR ¶¶ 72-79), another aggregate, three-year sentence in 2009 (PSR ¶ 93), and a sentence to a range between 12 and 48 months for a probation violation in 2016 (PSR ¶ 90). After each sentence, Speights returns to theft and fraud. Those lesser sentences have clearly been insufficient to deter him.

Nor is the prospect of a federal felony conviction sufficient to deter Speights. He made that clear when he fled from pretrial supervision to continue his fraud schemes. He is undeterred by the imprimatur of the District Court or the seriousness of the charges. His conviction alone will not deter him – a significant prison term is necessary to impress upon him that his way of life up to this moment cannot continue.

More generally, financial crimes like Speights' present a seductive opportunity to get rich with little perceived risk. It is all too easy for a fraudster to convince himself he will face no repercussions for his crimes. As such, it is all the more important to demonstrate that the repercussions are real. A sentence within the Guidelines range will reenforce to Speights and to the public that financial crimes are not worth the risk, and will have a meaningful general and specific deterrent impact.

IV. Conclusion

For the foregoing reasons, the government requests a sentence of 87 months of incarceration, at the top of the Sentencing Guidelines range. Such a sentence is sufficient, but not greater than necessary, to achieve the goals of sentencing set forth in 18 U.S.C. § 3553(a).

Respectfully submitted,

JULIANNE E. MURRAY
United States Attorney

By: */s/ Carly A. Hudson*
Carly A. Hudson
Assistant United States Attorney

Dated: September 11, 2025