
United States District Court
District of New Jersey

UNITED STATES OF AMERICA

v.

ABDULLAH BRYANT

: Hon. Cathy L. Waldor

: Magistrate No. 12- **7127**

: **CRIMINAL COMPLAINT**


I, Jeffrey Dant, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

SEE ATTACHMENT A

I further state that I am a Special Agent with the United States Secret Service and that this complaint is based on the following facts:

SEE ATTACHMENT B

Continued on the attached pages and made a part hereof: X Yes No


Jeffrey Dant, Special Agent
United States Secret Service

Sworn to before me and subscribed in my presence,
on April 30th, 2012 at Newark, New Jersey

HONORABLE CATHY L. WALDOR
United States Magistrate Judge


Signature of Judicial Officer

ATTACHMENT A

COUNT 1
(Bank Fraud)

From in or about September 2011 through in or about November 2011, in Essex County, in the District of New Jersey and elsewhere, defendant

ABDULLAH BRYANT

did knowingly execute and attempt to execute a scheme and artifice with intent to defraud a financial institution, namely Chase Bank, and to obtain money, funds, and assets owned by and under the custody and control thereof, by means of materially false and fraudulent pretenses, representations, and promises.

In violation of Title 18, United States Code, Section 1344 and Section 2.

Attachment B

1. I, Jeffrey W. Dant, a Special Agent with the United States Secret Service ("USSS"), having conducted an investigation and discussed this matter with other law enforcement officers who have participated in this investigation, have knowledge of the facts set forth below. Because this affidavit is being submitted for the limited purpose of establishing probable cause, I have not included every detail or every aspect of the investigation. Any conversations and statements described in this affidavit are related in substance and in part and are not word-for-word transcripts.

2. In the two month period between in and around September, 2011, and November, 2011, Chase Bank issued and sent via UPS approximately 21 duplicate credit cards based on phone calls from persons purporting to be the credit card holders. In each case, the callers falsely represented that they were Chase Bank credit card account holders who needed replacement cards and requested that one be shipped to an address different from the one appearing on Chase's records. The callers were able to provide basic identity information, such as the true name and social security number of the legitimate Chase account holder and ultimately persuaded a Chase representative to send the replacement cards as requested

("fraudulently obtained duplicate credit cards"). The total loss attributable to the 21 cards was approximately \$305,863.

3. After replacement cards were issued, four of them were used to purchase and in attempts to purchase goods consisting primarily of luxury items such as jewelry and expensive electronic equipment such as computers and 3D and HD television sets, among others, on the dates, locations and in the amounts shown as follows:

Account	Date/Time	Loss	Video	Amount	Store	Location
4836	9/16/11 7:35 PM	Actual		\$8,748.32	MACY'S	ROCKAWAY
4836	9/16/11 10:54 PM	Actual	V	\$1,089.98	TARGET	ROCKAWAY
4836	9/16/11 10:39 PM	Actual		\$800.00	WAL-MART	ROCKAWAY
4836	9/16/11 10:36 PM	Actual		\$1,080.57	WAL-MART	ROCKAWAY MORRIS PLAINS
4836	9/16/11 9:55 PM	Actual	V	\$2,487.91	KOHL'S	
4836	9/16/11 9:23 PM	Actual		\$800.00	WAL-MART	LEDGEWOOD
4836	9/16/11 9:20 PM	Actual		\$1,527.98	WALMART	LEDGEWOOD
4836	9/16/11 9:09 PM	Actual	V	\$908.12	VERIZON WIRELESS	SUCCASUNNA
4836	9/16/11 8:09 PM	Intended		\$1,550.00	WALMART	LEDGEWOOD
4836	9/16/11 7:56 PM	Actual		\$58.00	DELTA	LEDGEWOOD WEST ORANGE
9032	9/23/11 11:14 AM	Intended		\$157.50	MACY'S	WEST ORANGE
9032	9/23/11 11:13 AM	Intended		\$502.48	MACY'S	WEST ORANGE
9032	9/23/11 10:49 AM	Actual	V	\$295.38	WHOLEFOODS HIGHTECH AUTO CENTER	WEST ORANGE
9032	9/23/11 9:12 AM	Actual		\$1.00		NEWARK
9032	9/23/11 1:05 AM	Actual		\$53.46	PATHMARK	NEWARK
9032	9/22/11 9:22 PM	Actual		\$12,593.59	BEST BUY	UNION
0148	9/25/11 12:16 PM	Intended		\$17.22	NETFLIX	NETFLIX.COM
0148	9/20/11 7:58 PM	Intended		\$590.38	WAL-MART	OLD BRIDGE
0148	9/20/11 7:17 PM	Actual		\$48.00	DELTA	IRVINGTON
0148	9/20/11 5:44 PM	Actual		\$9,940.12	BEST BUY	UNION
0148	9/20/11 5:26 PM	Intended		\$5,809.99	BEST BUY	UNION
0148	9/20/11 5:25 PM	Intended		\$9,752.89	BEST BUY	UNION
0153	9/22/11 7:31 PM	Actual		\$7,334.72	BEST BUY	UNION

4. In addition to using the fraudulently obtained credit cards for purchases, card number 4836 was used on September 16, 2011, at the Verizon Wireless Store, located in Succasunna, New Jersey, to pay a phone bill belonging to "DG", in the amount of \$908.12. When the number associated with DG's bill was dialed, a recording of a female voice stated, in effect,

"You've reached 'T'. I've changed my number; my new number is XXX-XXX-XXXX".

5. According to the database CP Clear, the new number named in the recording belongs to defendant Abdullah Bryant. My review of Verizon's video of this transaction provided a photographic identification of defendant Abdullah Bryant, thereby establishing that defendant Abdullah Bryant used the fraudulently obtained credit card to pay a cellular phone bill in the amount of \$908.12.

6. I have reviewed video footage of each transaction at Target, Kohl's, and Whole Foods, relative to the transactions made with the four fraudulently obtained duplicate Chase credit cards. Using the photograph obtained by the Verizon video, I was able to identify defendant Abdullah Bryant as the purchaser in the transactions, described in paragraph 4, relating to these stores.

7. With regard to other purchase locations, where video was not available or was inoperative, such as Best Buy, Macy's, and


Wal-Mart, among others, I have examined the dates, times, and locations of these purchases and found them to be so proximate to other known purchases that were made by defendant Abdullah Bryant, that there is probable cause to believe that defendant Abdullah Bryant is responsible for them as well. For example, on September 16, 2011, card number 4836 was used at:

- 7:35pm, to charge: \$8748.32 at Macy's, in Rockaway, NJ.
- 7:56pm, to charge: \$ 58.00 at Delta Gas Station, Ledgewood, NJ.
- 8:09pm, to charge: \$1550.00 at Wal-Mart, Ledgewood, NJ.
- 9:09pm, to charge: \$ 908.12 at Verizon Wireless, Succasunna, NJ.
- 9:20pm, to charge: \$1527.96 at Wal-Mart, Ledgewood, NJ.
- 9:23pm, to charge: \$ 900.00 at Wal-Mart, Ledgewood, NJ.
- 9:55pm, to charge: \$2487.91 at Kohl's, Morris Plains, NJ.
- 10:36pm, to charge: \$1080.57 at Wal-Mart, Rockaway, NJ.
- 10:39pm, to charge: \$ 800.00 at Wal-Mart, Rockaway, NJ.
- 10:54pm, to charge: \$1069.98 at Target, Rockaway, NJ.

8. I have reviewed the available video tape footage at Verizon Wireless, Kohl's, and Target, all of which depict the defendant, Abdullah Bryant, making the purchases set forth in paragraph 4. I have also traveled between all locations at which

credit card number 4836 was used on September 16, 2011 and was able to do so within the time frames set forth in the preceding paragraph, thereby establishing it was defendant Abdullah Bryant using card number 4836 at each location on that date.

9. All of the purchases listed in paragraph 4 were made without the authorization of the legitimate Chase account holders.



JEFFREY W. DANT
Special Agent
United States Secret Service

Sworn to and subscribed
in my presence this 30th
day of April, 2012, at
Newark, New Jersey.



HONORABLE CATHY L. WALDOR
United States Magistrate Judge