

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA	:	Hon.
	:	
v.	:	Crim. No. 18-
	:	
HENRY ABDUL	:	18 U.S.C. § 1349
	:	18 U.S.C. § 1028A

INFORMATION

The defendant having waived in open court prosecution by indictment, the United States Attorney for the District of New Jersey charges:

Count One
(Conspiracy to Commit Bank Fraud)

Background

1. At various times relevant to this Information:
 - a. Defendant HENRY ABDUL ("ABDUL") was a resident of Newark, New Jersey, and North Brunswick, New Jersey.
 - b. Alexis Omowole ("Omowole"), a co-conspirator not named as a defendant in this Information, was a resident of North Brunswick, New Jersey.
 - c. "Victim Bank 1" and "Victim Bank 2" were "financial institutions," as that term is defined in Title 18, United States Code, Section 20, offering, among other things, credit cards to customers.
 - d. "Victim Cardholder 1" was a customer of Victim Bank 1 who resided in Massachusetts and held a credit card account ending in account number 1878.

e. A "credit card takeover" refers to a situation where an unauthorized user, who is not the account owner or authorized user of a credit card account, contacts the financial institution that issued the credit card and poses as the account owner in order to change the personal information associated with the actual account owner to information familiar to the unauthorized user. The information changed may include the residential address, email address, or telephone number associated with the account. These changes to the account are designed to give the unauthorized user control of the account without the actual account owner's knowledge or authorization, and may permit the unauthorized user to receive new credit cards associated with the compromised account. Once in control of the account, the unauthorized user profits by using the compromised account to make purchases, transfer funds to other accounts under the user's control, or sell the account information to third parties.

The Conspiracy

2. From in or about October 2015 through in or about January 2018, in Essex County, in the District of New Jersey, and elsewhere, defendant

HENRY ABDUL

did knowingly and intentionally conspire and agree with others to execute a scheme and artifice to defraud financial institutions, as defined in Title 18, United States Code, Section 20, whose deposits were insured by the Federal Deposit Insurance Corporation, and to obtain monies, funds, assets, and other property owned by and under the custody and control of such financial

institutions, by means of materially false and fraudulent pretenses, representations, and promises, contrary to Title 18, United States Code, Section 1344.

Goal of the Conspiracy

3. The goal of the conspiracy was for defendant ABDUL and others to obtain money and property from customer accounts of victim financial institutions by obtaining control of the customer accounts, including the account of Victim Cardholder 1, through a credit card takeover scheme, and then using the compromised credit card accounts to purchase gift cards, postal money orders, and high-value merchandise.

Manner and Means of the Conspiracy

4. It was part of the conspiracy that ABDUL and his co-conspirators obtained control of numerous credit card accounts provided by the Victim Banks and other financial institutions by, among other things, contacting the relevant financial institution and posing as the account owner in order to change the personal information associated with the customer accounts. The information changed included the residential address, email address, and telephone number associated with the accounts.

5. It was further part of the conspiracy that the co-conspirators opened new accounts or ordered replacement cards to be shipped to them by the victim financial institutions in the names of the bank customers without the customers' knowledge or authorization.

6. It was further part of the conspiracy that the co-conspirators, including defendant ABDUL and co-conspirator Omowole, used the compromised credit card accounts to purchase high-value items, including smartphones, tablets, and other electronic devices from a high-end electronics retailer. For example, on or about June 22, 2017, ABDUL purchased a new smartphone at a retail electronics store in or around Short Hills, New Jersey. To make the purchase, ABDUL used a credit card issued by Victim Bank 2 ending in 1878, which had previously been the subject of a credit card takeover. Victim Cardholder 1 was the actual owner of account number 1878. Over the course of the next day, the co-conspirators used the compromised account to make approximately \$17,000 in unauthorized purchases at various shopping malls in New Jersey.

7. It was further part of the conspiracy that co-conspirator Omowole gave ABDUL high-value merchandise she had purchased using the credit card takeover accounts and, in turn, ABDUL paid Omowole an amount proportionate to her spending activity.

All in violation of Title 18, United States Code, Section 1349.

Count Two
(Aggravated Identity Theft)

On or about June 22, 2017, in the District of New Jersey, and elsewhere,
the defendant

HENRY ABDUL

did knowingly transfer, possess, and use, without lawful authority, a means of identification of another individual, namely, a credit card account of Victim Cardholder 1, during and in relation to a felony violation of a provision contained in Chapter 63 of the United States Code, that is, conspiracy to commit bank fraud in violation of Title 18, United States Code, Section 1349, charged in Count One of this Information.

In violation of Title 18, United States Code, Section 1028A(a)(1), and Title 18, United States Code, Section 2.

FORFEITURE ALLEGATION

1. The allegations contained in this Information are hereby realleged and incorporated by reference for the purpose of noticing forfeiture pursuant to Title 18, United States Code, Section 982(a)(2).

2. The United States hereby gives notice to the defendant, that upon his conviction of the offense charged in Count One of this Information, the government will seek forfeiture in accordance with Title 18, United States Code, Section 982(a)(2), which requires any person convicted of such offense to forfeit any property constituting or derived from proceeds obtained directly or indirectly as a result of such offense.

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

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- 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 which cannot be divided without difficulty,

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1) and Title 28, United States Code, Section 2461(c), to seek forfeiture of

any other property of such defendant up to the value of the forfeitable property described in paragraph 2.



CRAIG CARPENITO
United States Attorney

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