
UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA

v.

ALATEEF PERRY and
RAJOHN DAWKINS

Hon. Michael A. Hammer

Mag. No. 21-10161

CRIMINAL COMPLAINT

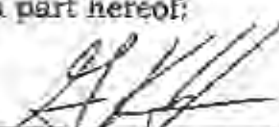
I, Gregory Kloepper, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

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

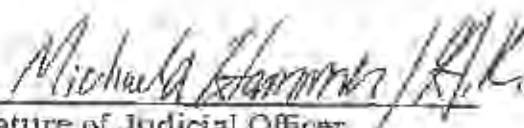
Continued on the attached page and made a part hereof:



Gregory Kloepper, Special Agent
United States Secret Service

Special Agent Kloepper attested to this complaint
by telephone on April 8, 2021 pursuant to F.R.C.P. 4.1

Honorable Michael A. Hammer
United States Magistrate Judge



Signature of Judicial Officer

ATTACHMENT A

From in or around July 2019 through in or around March 2020, in the District of New Jersey and elsewhere, the defendants,

**ALATEEF PERRY
and
RAJOHN DAWKINS,**

did knowingly and intentionally conspire and agree with each other and others to commit an offense against the United States, namely, knowingly and with the intent to defraud trafficked in or used one or more unauthorized access devices, as defined in subsection 18 U.S.C. § 1029(e)(3), during any one-year period, and by such conduct obtained anything of value aggregating \$1,000 or more during that period, said use affecting interstate or foreign commerce, contrary to 18 U.S.C. § 1029(a)(2).

In violation of Title 18, United States Code, Section 371.

ATTACHMENT B

I, Gregory Kloepper, am a Special Agent with the United States Secret Service ("USSS"). I have knowledge about the facts set forth below from my involvement in the investigation, my review of reports, documents, pictures, videos, witness interviews, discussions with other law enforcement officials, and my training and experience. This affidavit is submitted for a limited purpose, and I have not set forth each and every fact that I know concerning this investigation. All statements described herein are relayed in substance and in part.

Relevant Individuals

1. At all times relevant to this criminal complaint:
 - a. Defendant Alateef Perry ("PERRY") was a resident of New Jersey.
 - b. Defendant Rajohn Dawkins ("DAWKINS") was a resident of New Jersey.
 - c. Victim-1 was a resident of Georgia and owned a debit card from Bank-1.
 - d. Victim-2 was a resident of Virginia and owned a debit card from Bank-1.
 - e. Bank-1 was an American commercial bank offering credit and debit cards to consumers.

Overview and Object of the Conspiracy

2. From at least in or around July 2019 through in or around March 2020, PERRY and DAWKINS sought to profit by fraudulently using debit cards in the names of other individuals—without their consent or knowledge—to purchase diesel fuel for commercial truck drivers in exchange for cash. Using over 500 unauthorized debit cards on dozens of occasions, the defendants stole over \$220,000 from victim individuals through this fraudulent debit card scheme.

Manner and Means of the Conspiracy

3. Surveillance footage, transaction records, and witness statements collectively revealed that the scheme operated as follows. PERRY and DAWKINS obtained hundreds of unauthorized debit cards in the names of individuals without the individuals' knowledge or consent. Commercial truck drivers then met PERRY and DAWKINS at various gas stations on dozens of

occasions in and around New Jersey, including gas stations located in Hanover and Middlesex, New Jersey. PERRY and DAWKINS used the unauthorized debit cards to fill the drivers' commercial trucks with diesel fuel. The truck drivers then typically paid PERRY and DAWKINS a fraction of the fuel's purchase price in cash, which PERRY and DAWKINS pocketed.

4. Law enforcement obtained transaction records from the gas stations, along with surveillance footage corresponding with dozens of fraudulent transactions. The surveillance footage depicts PERRY and DAWKINS paying for diesel gas at the pumps. Law enforcement interviewed multiple victims whose debit cards were used to purchase the diesel fuel, all of whom confirmed that they had not authorized the transactions. Law enforcement also interviewed multiple commercial truck drivers who confirmed that they paid PERRY and DAWKINS discounted prices for diesel fuel.

5. For example, during the week of August 4, 2019, surveillance footage captured DAWKINS paying for gas at a diesel fuel pump in Hanover, New Jersey (the "Hanover Gas Station"). Based on the time of the transaction, law enforcement determined that the fuel purchased during that transaction was charged to Victim-1's Bank-1 debit card. Law enforcement interviewed Victim-1 and confirmed that Victim-1 did not authorize the transaction.

6. As another example, during the week of September 9, 2019, surveillance footage captured PERRY with Individual-1 and Individual-2—two commercial truck drivers—at the Hanover Gas Station. Based on the time of the footage, law enforcement determined that the interaction between PERRY, Individual-1, and Individual-2 corresponded with a transaction in which fuel was charged to Victim-2's Bank-1 debit card. Law enforcement interviewed Victim-2 and confirmed that Victim-2 did not authorize the transaction.

7. Law enforcement also interviewed Individual-1, who said that Individual-1 purchased discounted gas in cash from PERRY and DAWKINS on multiple occasions. During those interactions, Individual-1 observed PERRY and DAWKINS use multiple cards to purchase diesel fuel. According to Individual-1, Individual-1 generally paid PERRY and DAWKINS approximately 80 percent of the retail fuel purchase price in cash.

8. Law enforcement also interviewed Individual-2, who said that Individual-2 purchased diesel fuel on multiple occasions from two individuals who match the descriptions of DAWKINS and PERRY.

9. Transaction records, surveillance footage obtained from the gas stations, and witness statements revealed that PERRY and DAWKINS used more than 500 unauthorized debit cards in the scheme and stole over \$220,000.