

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

UNITED STATES OF AMERICA : Hon.  
: :  
: Criminal No. 21-  
v. :  
: 18 U.S.C. § 982(a)(2)(B)  
KYLE WILLIAMS : 18 U.S.C. §§ 1029(a)(5), (b)(2),  
: & (c)(1)(C)

**I N F O R M A T I O N**

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

1. At all times relevant to this Information:
  - a. Defendant KYLE WILLIAMS (“WILLIAMS”) was a resident of Vauxhall, New Jersey, and an employee of the U.S. Postal Service in West Caldwell, New Jersey.
  - b. Jarid Brooks, Justin Brook, and Kyjuan Hutchins (“Hutchins”) were residents of Vauxhall.
  - c. The U.S. Post Office in West Caldwell served West Caldwell and neighboring towns, including North Caldwell, Caldwell, and Fairfield, New Jersey.

**The Conspiracy**

2. From in or about July 2019 to in or about August 2020, in Essex, Hudson, Morris, Ocean, Passaic, Somerset, and Union Counties, in the District of New Jersey, and elsewhere, defendant

**KYLE WILLIAMS**

did knowingly and intentionally conspire and agree with others to effect transactions with one or more access devices issued to other persons, namely, credit cards, with intent to defraud, to receive payment and things of value aggregating to \$1,000 and more during a one-year period, affecting interstate commerce, contrary to Title 18, United States Code, Section 1029(a)(5).

**Object of the Conspiracy**

3. The object of the conspiracy was for WILLIAMS, Jarid Brooks, Justin Brooks, Hutchins, and others to obtain credit cards stolen out of the U.S. mail by WILLIAMS and use the stolen credit cards to make unauthorized purchases.

**Means and Methods**

4. It was a part of the conspiracy that:
- a. WILLIAMS stole envelopes containing credit cards from the U.S. mail and delivered those credit cards to Jarid Brooks, Justin Brooks, and others.
  - b. Jarid Brooks, Justin Brooks, and others provided the stolen credit cards to Hutchins and others, who were referred to as “runners,” and who used the stolen credit cards at various retail stores in New Jersey to purchase retail goods and gift cards.
  - c. WILLIAMS and Hutchins received cash payments or gift cards from Jarid Brooks, Justin Brooks, and others, in exchange for their respective participation in the scheme.

**Overt Acts**

5. In furtherance of the conspiracy, the following overt acts, among others, were committed in the District of New Jersey and elsewhere:

a. On or about December 4, 2019, WILLIAMS, while assigned to deliver mail on a postal route in West Caldwell, stole out of the mail two credit cards issued to two different accountholders residing on that route.

b. On or about December 30, 2019, WILLIAMS, while assigned to deliver mail on a postal route in West Caldwell, stole out of the mail a credit card issued to an accountholder residing on that route.

c. On or about January 18, 2020, WILLIAMS, while assigned to deliver mail on a postal route in Fairfield, stole out of the mail a credit card issued to an accountholder residing on that route.

d. On or about January 21, 2020, in Madison, New Jersey, Jarid Brooks used the credit card issued to the accountholder residing in Fairfield and that WILLIAMS stole out of the mail to make a fraudulent purchase in the amount of approximately \$1,456.10.

In violation of Title 18, United States Code, Section 1029(b)(2).

**FORFEITURE ALLEGATION**

1. The allegations contained in all paragraphs of this Information are hereby realleged and incorporated by reference for the purpose of noticing forfeiture pursuant to Title 18, United States Code, Sections 982(a)(2)(B) and 1029(c)(1)(C).

2. The United States hereby gives notice to defendant

**KYLE WILLIAMS**


that, upon conviction of the offense of conspiracy, contrary to Title 18, United States Code, Section 1029(a)(5), in violation of Title 18, United States Code, Section 1029(b)(2), as charged in this Information, the United States will seek forfeiture, in accordance with Title 18, United States Code, Section 982(a)(2)(B), of any property constituting, and derived from, proceeds WILLIAMS obtained, directly and indirectly, as the result of such violation; and, in accordance with Title 18, United States Code, Section 1029(c)(1)(C), any and all personal property used and intended to be used to commit such offense.

3. The property subject to forfeiture pursuant to Title 18, United States Code, Section 982(a)(2)(B) includes, but is not limited to, \$146 in U.S. currency, two Target gift cards, two Vanilla Visa gift cards, one Mastercard gift card, and two Cheesecake Factory gift cards, all of which were seized from WILLIAMS' residence on or about October 6, 2020.

4. If any of the above-described forfeitable property, as a result of any act or omission of WILLIAMS:

- 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), and Title 18, United States Code, Section 1029(c)(2), to seek forfeiture of any other property of WILLIAMS up to the value of the forfeitable property described above.

  
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RACHAEL A. HONIG  
Acting United States Attorney

CASE NUMBER: 21-

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**United States District Court  
District of New Jersey**

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**UNITED STATES OF AMERICA**

**v.**

**KYLE WILLIAMS**

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**INFORMATION FOR**  
**18 U.S.C. § 982(a)(2)(B)**  
**18 U.S.C. §§ 1029(a)(5), (b)(2), & (c)(1)(C)**

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**RACHAEL A. HONIG**  
*ACTING UNITED STATES ATTORNEY*  
*NEWARK, NEW JERSEY*

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ELAINE K. LOU  
*ASSISTANT U.S. ATTORNEY*  
*973-645-2747*

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