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

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UNITED STATES OF AMERICA : Hon. André M. Espinosa, U.S.M.J.  
 :  
 v. : Mag. No. 21-11217  
 :  
 YASEEN SALIH and : **CRIMINAL COMPLAINT**  
 ADEEB SALIH :  
 :

I, Ryan Gale, 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 Postal Inspector with the United States Postal Inspection Service, and that this complaint is based on the following facts:

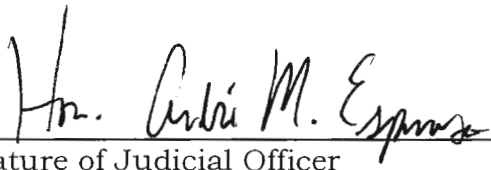
**SEE ATTACHMENT B**

Continued on the attached page and made a part hereof:

  
\_\_\_\_\_  
Ryan Gale  
Postal Inspector  
U.S. Postal Inspection Service

Attested to by telephone pursuant to  
Fed. R. Crim. P. 4.1 on August 25, 2021  
in the District of New Jersey

HONORABLE ANDRÉ M. ESPINOSA  
UNITED STATES MAGISTRATE JUDGE

  
\_\_\_\_\_  
Signature of Judicial Officer

**ATTACHMENT A**

**COUNT 1**  
**(Conspiracy to Commit Bank Fraud)**

Between on or about at least December 12, 2020 and on or about July 31, 2021, in Essex County, in the District of New Jersey and elsewhere,  
defendants

YASEEN SALIH and  
ADEEB SALIH

knowingly and intentionally did conspire and agree with each other and 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.

In violation of Title 18, United States Code, Section 1349.

**COUNT 2**  
**(Conspiracy to Commit Mail Theft and to Possess Stolen Mail)**

Between at least on or about December 12, 2020 and on or about July 31, 2021, in Essex County, in the District of New Jersey and elsewhere,  
defendants

YASEEN SALIH and  
ADEEB SALIH

knowingly and intentionally did conspire and agree with each other and with others, to commit an offense against the United States and one or more persons acted to effect the object of the conspiracy, namely steal, take, and abstract from out of any mail, post office, and station thereof, letters and mails, and abstract and remove from such letters and mails, articles and things contained therein, and to buy, receive, and unlawfully possess the same to which they knew to have been stolen, taken, embezzled, and abstracted, contrary to Title 18, United States Code, Section 1708.

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

**COUNTS 3 - 4**  
**(Aggravated Identity Theft)**

On or about the dates specified below, in the District of New Jersey and elsewhere, the defendants specified below, during and in relation to the offense set forth in Count 1, each did knowingly transfer, possess, and use, without lawful authority, means of identification of another person, namely credit cards.

<b>Count</b>	<b>Defendant</b>	<b>Date</b>	<b>Credit Card Belonging To</b>
3	YASEEN SALIH	January 25, 2021	Accountholder-1
4	ADEEB SALIH	May 4, 2021	Accountholder-3

In violation of Title 18, United States Code, Section 1028A and Section 2.

## **ATTACHMENT B**

I, Ryan Gale, a Postal Inspector with the United States Postal Inspection Service ("USPIS"), having personally participated in an investigation of the conduct of defendants YASEEN SALIH and ADEEB SALIH, and co-conspirators Jahad Salter, Khadijah Banks Oneal, and Ashley Taylor, and having spoken with other law enforcement officers and individuals, have knowledge of the following facts. Because this Complaint is submitted for the limited purpose of establishing probable cause, I have not included all facts known to me concerning this investigation.

### **Relevant Individuals and Entities**

1. At various times relevant to this Criminal Complaint,
  - a. Defendant YASEEN SALIH was a resident of Iselin, New Jersey and elsewhere within New Jersey.
  - b. Defendant ADEEB SALIH was a resident of East Orange, New Jersey and elsewhere within New Jersey.
  - c. Jahad Salter ("Salter")<sup>1</sup> was a resident of Newark, New Jersey.
  - d. Khadijah Banks Oneal ("Banks Oneal")<sup>2</sup> was an employee of the United States Postal Service ("USPS"), employed at Dominick V. Daniels Processing and Distribution Center, in Kearny, New Jersey;
  - e. Ashley Taylor ("Taylor")<sup>3</sup> was an employee of the USPS, employed at the Murray Hill Carrier Annex United States Post Office in Manhattan, New York.
  - f. J.P. Morgan Chase Bank, N.A. ("Chase"), PNC Bank ("PNC Bank"), Synchrony Bank ("Synchrony"), American Express National Bank

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<sup>1</sup> On July 29, 2021, Salter was charged by criminal complaint with conspiracy to commit access device fraud and conspiracy to commit mail theft in the District of New Jersey at Magistrate Number 21-11167 (AME).

<sup>2</sup> On July 28, 2021, Banks Oneal was charged by criminal complaint with conspiracy to commit access device fraud and mail theft in the District of New Jersey at Magistrate Number 21-11127 (AME).

<sup>3</sup> On August 2, 2021, Taylor was charged by criminal complaint with conspiracy to commit theft of mail and bribery of a public official in the District of New Jersey at Magistrate Number 21-9377 (CLW).

("American Express"), Capital One Bank (USA), NA ("Capital One"), and Department Stores National Bank ("DSNB") (collectively, the "Financial Institutions") were "financial institutions" as that term is defined in Title 18, United States Code, Section 20, whose deposits were insured by the Federal Deposit Insurance Corporation ("FDIC"), and who offered, among other products, credit cards to customers.

g. "Accountholder 1" was a customer of PNC Bank who resided in Monroe Township, New Jersey.

h. "Accountholder 2" was a customer of Chase who resided in Verona, New Jersey.

i. "Accountholder 3" and "Accountholder 4" were customers of Chase who resided in New York, New York.

j. "Accountholder 5" was a customer of Chase who resided in Orange, New Jersey.

### **Overview of the Conspiracy**

2. A law enforcement investigation revealed that USPS employees Banks Oneal and Taylor stole envelopes containing credit cards (the "Stolen Credit Cards"), checks, and United States Treasury Checks ("Treasury Checks") from the U.S. mail and gave them to others, including, at varying times, defendant YASEEN SALIH and co-conspirator Salter, in exchange for cash payments.

3. Regarding the Stolen Credit Cards, the investigation also revealed that defendants YASEEN SALIH and ADEEB SALIH, Salter, and Banks Oneal fraudulently posed as the Stolen Credit Cards' accountholders and called the banks that issued the Stolen Credit Cards, used personal identifying information belonging to the accountholders to obtain and/or change information about the Stolen Credit Cards, and then used the Stolen Credit Cards to, among other things, make purchases at retail stores in New Jersey and elsewhere.

4. Regarding the stolen checks, the investigation revealed that ADEEB SALIH deposited stolen checks into bank accounts that were under his control in order obtain the checks' proceeds.

### **Defendants and Co-Conspirators Obtained Stolen Credit Cards and Checks**

5. The investigation revealed that the defendants and co-conspirators supplied each other with checks and Stolen Credit Cards that had been stolen from the U.S. mail. For instance, YASEEN SALIH obtained the Stolen Credit

Cards and checks directly from then-USPS employee Taylor. Salter obtained the Stolen Credit Cards and checks from then USPS-employee Banks Oneal.

6. A review of cellular telephones seized from YASEEN SALIH and Taylor revealed that YASEEN SALIH obtained credit cards, checks, and Treasury Checks from Taylor in exchange for payments to Taylor between at least on or about February 24, 2021 and at least on or about August 2, 2021.

7. For example, on or about February 24, 2021, while Taylor was working a shift at the Murray Hill USPO, YASEEN SALIH and Taylor exchanged text messages regarding Taylor's theft of Treasury Checks from the U.S. mail. In that regard, YASEEN SALIH sent a message to TAYLOR stating, "LetS get it lmk in the AM[,] to which Taylor replied, "Aight bet[,] thus, YASEEN SALIH told Taylor that he would buy stolen mail from her and Taylor agreed to sell mail that she stole and agreed to tell YASEEN SALIH what she had for sale in the morning. YASEEN SALIH replied, "Get all stimulus checks as wells[,] instructing Taylor to steal federal stimulus checks (in the form of Treasury Checks) from the U.S. mail along with credit cards so that she could provide them to YASEEN SALIH in exchange for payments.

8. On or about May 6, 2021, YASEEN SALIH and Taylor exchanged WhatsApp messages regarding Taylor's theft of checks from the U.S. mail. Taylor sent messages to YASEEN SALIH that stated, "I have 35 slips[,] Dated 4/25[,] Most of them over a stack and better[,] which referred to TAYLOR having 35 checks (referred to as "slips") dated April 25<sup>th</sup>, the majority of which were for \$1,000 (referred to as "a stack") or more. YASEEN SALIH replied, "Can you meet me please[,] And sell all them today[.]" Taylor agreed, and YASEEN SALIH proposed, "Okay pull up on me and I'll pull up on u later with the money[,] namely, that Taylor should deliver the checks to YASEEN SALIH and that YASEEN SALIH would travel to Taylor's home at a later time to pay her for the checks. Taylor asked YASEEN SALIH, "What's your address[,] and YASEEN SALIH provided an address in Orange, New Jersey (the "Orange Address"). Later that day, Taylor sent messages to YASEEN SALIH stating "6 mins away[,] "Wya[,] "Here[,] namely that Taylor had the stolen checks on her person for delivery to YASEEN SALIH, was 6 minutes away from the Orange Address, asked YASEEN SALIH "Wya" (shorthand for "where you at") to discern YASEEN SALIH's location, and told YASEEN SALIH that Taylor was at the Orange Address. Based on the above, it is likely that Taylor traveled to Orange to provide the stolen checks to YASEEN SALIH.

9. On or about May 7, 2021, YASEEN SALIH and Taylor exchanged WhatsApp messages regarding YASEEN SALIH paying Taylor in exchange for the checks that she had stolen and then delivered to YASEEN SALIH the day prior. YASEEN SALIH sent Taylor a message stating, "I owe you 5800 correct ?[,] clarifying that YASEEN SALIH owed Taylor \$5,800 for the checks Taylor

delivered. Taylor replied, "Yes[,] And you can take a band so 4800[.]" namely Taylor told YASEEN SALIH that he could take \$1,000 (referred to as "a band"), reducing the amount YASEEN SALIH owed to Taylor to \$4,800. Based on additional messages between YASEEN SALIH and Taylor, YASEEN SALIH then traveled to meet Taylor and deliver this payment.

10. The review of a cellular telephone seized from Salter revealed that, from at least on or about February 4, 2021 through at least on or about March 30, 2021, Salter obtained credit cards and checks directly from Banks Oneal in exchange for payments to Banks Oneal, as detailed in the Complaint in *United States v. Jahad Salter*, docketed at Mag. No. 21-11167 (AME).

### **Trafficking In and Negotiating Stolen Checks**

11. YASEEN SALIH supplied stolen checks to ADEEB SALIH. Salter also supplied ADEEB SALIH with the Stolen Credit Cards and checks.

12. The review of a cellular telephone seized from YASEEN SALIH revealed that YASEEN SALIH supplied ADEEB SALIH with checks that Taylor stole from the mail and sold to YASEEN SALIH. ADEEB SALIH then deposited the checks in bank accounts that were in the names of third-parties but were under ADEEB SALIH's control.

13. For example, on or about March 8, 2021, YASEEN SALIH sent ADEEB SALIH a text message asking for payment. Then, on or about March 9, 2021, ADEEB SALIH sent a text message to YASEEN SALIH containing a screenshot showing balances for two Bank of America accounts in the name of a third-party. YASEEN SALIH responded, "Your a waste of my time don't even know how to do a job the right way" and attached a screenshot of a discussion on WhatsApp between YASEEN SALIH and Taylor in which YASEEN SALIH and Taylor discuss meeting. YASEEN SALIH then texted ADEEB SALIH, "I'm not doing nothing with you no more[.]" to which ADEEB SALIH replied, "It clears tmmrw bro[.]" representing that ADEEB SALIH would have access to the money from the stolen check or checks the next day. After a series of text messages in which ADEEB SALIH and YASEEN SALIH argued, YASEEN SALIH wrote, "Your a waste I'm meeting my plug to get more she expecting to get money[.]" Thus, YASEEN SALIH told ADEEB SALIH that YASEEN SALIH was meeting Taylor – referred to as his "plug" because she is how he obtained stolen mail – and YASEEN SALIH had to pay Taylor for the check(s) in ADEEB SALIH's possession that had not yet cleared. Despite their discussion, YASEEN SALIH continued to sell ADEEB SALIH checks, as shown by a May 29, 2021 text from ADEEB SALIH to YASEEN SALIH stating, "& let me buy the slips to do the Welly bro[.]" namely, ADEEB SALIH said he would purchase checks (referred to as "slips") to deposit in a Wells Fargo account.

14. Salter also supplied ADEEB SALIH with stolen Treasury Checks

that Salter obtained from Banks Oneal and others. For example, on or about March 29, 2021, ADEEB SALIH and Salter exchanged text messages regarding ADEEB SALIH purchasing Treasury Checks from Salter. Salter sent a text message to ADEEB SALIH asking, "What you need[.]" to which ADEEB SALIH replied, "Joe Biden gang[.]" namely ADEEB SALIH asked Salter to supply ADEEB SALIH with Treasury Checks for stimulus payments, which ADEEB SALIH referred to as "Joe Biden[.]" Salter replied, "I though [sic] you had Some[.]" namely Salter thought ADEEB SALIH already had Treasury Checks. ADEEB SALIH responded, "I did they weak though for 1400\$ 6 of em and chase only take 1 stinky at time or it's gonna vibe indeed big number for 5 for 2month & something bigger than 7-8k for old boy bevyyyy feel me bro[.]" In this text message, ADEEB SALIH confirmed that he had Treasury Checks, but explained that they were "weak," or not particularly useful. ADEEB SALIH went on to explain that the checks that he had were in low amounts of about \$1,400 each, and he could only deposit one check at a time into a Chase checking/debit account. ADEEB SALIH then sought larger-value checks from Salter – exceeding \$7,000 to \$8,000 in value – which ADEEB SALIH represented that he could deposit into a Chase account under his control – referred to as "bevyyy" (misspelling of "Chevy," which is a reference to Chase) because that account was older and more established. Thus, ADEEB SALIH was depositing Treasury Checks into bank accounts in order to withdraw the cash value of those checks.

#### **Unauthorized Use of Stolen Credit Cards**

15. The investigation revealed that, during periods between on or about December 12, 2020 and on or about July 31, 2021, YASEEN SALIH, ADEEB SALIH, Salter, and Banks Oneal each called at least one Financial Institution regarding Stolen Credit Cards.

16. Using personal identifying information belonging to third-party accountholders, they each fraudulently posed as the accountholders when calling to ascertain and/or increase credit limits, activate the credit cards, or challenge declined transactions. In total, the Financial Institutions reported that approximately \$319,283.28 in fraudulent charges were attempted on the Stolen Credit Cards about which telephone numbers used by YASEEN SALIH, ADEEB SALIH, Salter, and/or Banks Oneal called. This resulted in an actual loss of approximately \$243,692.08.

#### ***YASEEN SALIH & Salter***

17. A review of a cellular telephone seized from Salter revealed that YASEEN SALIH and Salter communicated regarding Stolen Credit Cards and their accountholders on multiple occasions, including by sharing personal identifiers of the third-party accountholders to enable access to the Stolen Credit Cards.



18. For example, on or about January 25, 2021, using a messaging application, YASEEN SALIH sent Salter a photograph of the address portion of a mailer from PNC Bank that ordinarily accompanies a credit card, which was addressed to Accountholder-1 in Monroe Township ("Account-1"). Using the same messaging application, on or about January 28, 2021, Salter sent YASEEN SALIH the name, social security number, date of birth, current and previous addresses, and phone numbers for Accountholder-1. The same day, YASEEN SALIH called PNC Bank three times to inquire on this Account-1 credit card account. According to PNC Bank records, on or about January 28, 2021, the credit card on Account-1 was activated and used at a jewelry store in Paterson, New Jersey for transactions totaling approximately \$5,584.

19. PNC Bank reported that all credit cards, including the credit card associated with Account-1, are shipped to accountholders via the U.S. mail from Richmond, Virginia. PNC Bank records indicate that Account-1 was reported as not received by Accountholder-1 and the January 28, 2021 purchases were made without Accountholder-1's authorization.

20. On or about March 24, 2021, YASEEN SALIH sent Salter a text message containing the name and address of Accountholder-2. YASEEN SALIH immediately sent Salter another text message stating, "Get the number for the Chevy so we can activate it[.]" namely YASEEN SALIH, referred to Chase as "Chevy" and told Salter to get the telephone number belonging to the Accountholder-2 so that YASEEN SALIH and Salter could activate Accountholder-2's credit card. Salter then sent YASEEN SALIH a text message containing the telephone number belonging to Accountholder-2. Accountholder-2's credit card, which was issued by Chase ("Account-2"), was used between on or about March 24, 2021 and on or about March 26, 2021, without Accountholder-2's authorization, for purchases totaling approximately \$27,590 at a jewelry store in Iselin, New Jersey.

21. The credit card associated with Account-2 was shipped by Chase via First Class U.S. mail from in or around Columbus, Ohio on or about March 16, 2021, to Accountholder-2 in Verona. The credit card associated with Account-2 was reported by Chase as not received by Accountholder-2.

#### *ADEEB SALIH & YASEEN SALIH*

22. A review of a cellular telephone seized from YASEEN SALIH revealed that ADEEB SALIH and YASEEN SALIH also communicated regarding stolen credit cards on multiple occasions.

23. For example, on or about May 1, 2021, ADEEB SALIH sent to YASEEN SALIH a series of seven images of Chase-issued credit cards (the "May 1 Cards") that were attached to or in front of mailers. One of the May 1 Cards was issued to Accountholder-3 ("Account-3") and another was issued to

Accountholder-4 ("Account-4"). ADEEB SALIH then sent YASEEN SALIH multiple screenshots that contained Accountholder-3's name, social security number, issuance date range and location for that social security number, and date of birth. ADEEB SALIH also sent YASEEN SALIH screenshots containing Accountholder-4's name, social security number, issuance date range and location for that social security number, date of birth, associated addresses, and phone number.

24. ADEEB SALIH then used the same cellular telephone to contact Chase approximately 3 times regarding Account-3 and approximately 2 times regarding Account-4 between May 1, 2021 and May 2, 2021.

25. The credit cards associated with Account-3 and Account-4 were each shipped by Chase via First Class U.S. mail from in or around Columbus, Ohio on or about April 19, 2021 and on or about April 20, 2021, respectively, to Accountholder-3 and Accountholder-4 at their addresses in New York, New York within a zip code for which mail delivery was handled by the U.S. Post Office at which Taylor was employed. The credit cards associated with Account-3 and Account-4 were catalogued by Chase as not received and reported as lost/stolen by the cardholders. Fraud was first reported on Account-3 on or about April 26, 2021, and on Account-4, on or about April 30, 2021, according to Chase.

26. On or about May 2, 2021, a \$2.60 transaction was attempted on Account-3, and that attempt was declined. On or about May 4, 2021, at approximately 7:11 p.m., a second attempted charge was made using Account-3 in the amount of \$28.72, at a Chick-Fil-A in or around Union, New Jersey. That attempted charge was declined. Shortly thereafter, at approximately 7:13 p.m., a \$13.56 transaction on Account-4 was attempted at the same Chick-Fil-A, and that attempted charge was also declined. Based on my training and experience and knowledge of the investigation to date, this indicates that the same person or co-conspirators attempted to use Account-3 and Account-4 at Chick-Fil-A on or about May 4, 2021.

#### *ADEEB SALIH*

27. On or about July 31, 2021, ADEEB SALIH used a cellular telephone to call Chase at approximately 7:03 p.m., approximately 8:58 p.m., and approximately 9:03 p.m., regarding a credit card ("Account-5") that was issued to Accountholder-5 at an address in Orange (the "Orange Cardholder Address").

28. On or about July 31, 2021, at approximately 9:02 p.m. and approximately 9:03 p.m., two charges for \$3,807.36, were attempted at an Apple Store in or around New York, New York, using the credit card associated with Account-5. Both charges were declined. Video footage from the Apple

Store showed the person who attempted to use Account-5 at the Apple Store was an individual matching ADEEB SALIH's description who, immediately after the attempted transactions, appeared to use a cellular telephone. As noted above, ADEEB SALIH's phone records show that ADEEB SALIH called Chase on his telephone within approximately the same minute as the second failed transaction at the Apple Store with Account-5.

29. The credit card associated with Account-5 was shipped by Chase via First Class U.S. mail from in or around Columbus, Ohio on or about July 26, 2021, to Accountholder-5 at the Orange Cardholder Address. The credit card associated with Account-5 was reported by Chase as not received by Accountholder-5, and Chase's records indicate that fraud was reported on or about August 10, 2021.