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

UNITED STATES OF AMERICA : Hon. André M. Espinosa, U.S.M.J.
 :
 v. : Mag. No. 21-11166 (AME)
 :
 DASHAUN BROWN : **CRIMINAL COMPLAINT**
 :

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 July 29, 2021
in the District of New Jersey

HONORABLE ANDRÉ M. ESPINOSA
UNITED STATES MAGISTRATE JUDGE



Signature of Judicial Officer

ATTACHMENT A

COUNT 1
(Access Device Fraud)

On or about May 4, 2021, in Essex County, in the District of New Jersey and elsewhere, defendant

DASHAUN BROWN

knowingly and with intent to defraud did effect transactions with an access device issued to another person to receive things of value during a one-year period, and by such conduct obtained things of value aggregating to \$1,000 and more during that period, in a manner affecting interstate commerce.

In violation of Title 18, United States Code, Section 1029(a)(5).

COUNT 2
(Aggravated Identity Theft)

On or about May 4, 2021, in Essex County, in the District of New Jersey and elsewhere, defendant

DASHAUN BROWN,

during and in relation to the offense set forth in Count 1, did knowingly transfer, possess, and use, without lawful authority, means of identification of another person, namely a credit card and a fraudulent driver's license.

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

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 defendant DASHAUN BROWN 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.

1. On or about May 4, 2021, at a car dealership in or around Irvington, New Jersey (the "Dealership"), DASHAUN BROWN ("BROWN") purchased a 2013 black BMW 328i xDrive Coupe (the "BMW") using a combination of a credit card ("Card-1") issued JP Morgan Chase Bank NA ("Chase"), which bore the name of an individual who lived in New Providence, New Jersey (the "Individual-1"), and not BROWN. BROWN charged approximately \$8,600 on the Card towards the purchase of the BMW.

2. In order to purchase the BMW, BROWN also presented a fraudulent Connecticut driver's license in the name of Individual-1, which bore BROWN's photograph, a birth year close to BROWN's, and a Connecticut address.

3. On the same day that he purchased the BMW, BROWN also used Card-1 to purchase several bottles of Yoo-Hoo-branded drinks and a car charger with a cable, at a gas station in or around Harrison, New Jersey, which was captured on video.

4. Card-1 was sent, via the United States mail, from in or around Columbus, Ohio to Individual-1 at Individual-1's address within New Providence. Card-1 was never delivered to Individual-1. Instead, BROWN possessed and used Card-1 as stated above.