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

UNITED STATES OF AMERICA : Hon. André M. Espinosa, U.S.M.J.
 :
 v. : Mag. No. 21-11218
 :
 HAKIR 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 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
(Bank Fraud)

Between on or about at least January 30, 2020 and in or about June 17, 2021, in Essex County, in the District of New Jersey and elsewhere, defendant

HAKIR BROWN

knowingly and intentionally did execute and attempt 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.

In violation of Title 18, United States Code, Section 1344 and Section 2.

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

Between at least on or about January 30, 2020 and in or about June 17, 2021, in Essex County, in the District of New Jersey and elsewhere, defendant

HAKIR BROWN

knowingly and intentionally did conspire and agree 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 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.

COUNT 3
(Aggravated Identity Theft)

Between on or about March 2, 2021 and on or about March 18, 2021, in the District of New Jersey and elsewhere,

HAKIR 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 issued to Accountholder-A.

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 defendant HAKIR BROWN and co-conspirators Jahad Salter, Dashaun Brown, Khadijah Banks Oneal, 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 HAKIR BROWN was a resident of Newark, New Jersey.
 - b. Jahad Salter ("Salter")¹ was a resident of Newark.
 - c. Dashaun Brown ("DBrown")² was a resident of Newark and elsewhere within New Jersey.
 - d. Khadijah Banks Oneal ("Banks Oneal")³ was an employee of the United States Postal Service ("USPS"), employed at Dominick V. Daniels Processing and Distribution Center, in Kearny, New Jersey.
 - e. J.P. Morgan Chase Bank, N.A. ("Chase"), PNC Bank ("PNC Bank"), Synchrony Bank ("Synchrony"), American Express National Bank ("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

¹ 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).

² On July 29, 2021, Brown was charged by criminal complaint with access device fraud and aggravated identity theft in the District of New Jersey at Magistrate Number 21-11166 (AME).

³ 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).

Deposit Insurance Corporation (“FDIC”), and who offered, among other products, credit cards to customers.

f. “Accountholder A” was a customer of Synchrony who resided in Edison, New Jersey.

Overview of the Offenses

2. A law enforcement investigation revealed that USPS employee Banks Oneal stole envelopes containing credit cards (the “Stolen Credit Cards”) and other financial instruments (including checks) from the U.S. mail and gave them to others, including, at varying times, defendant HAKIR BROWN and co-conspirators Salter and DBrown.

3. Defendant HAKIR BROWN, Salter, DBrown, and Banks Oneal fraudulently posed as the Stolen Credit Cards’ accountholders and called the banks that issued the Stolen Credit Cards and used personal identifying information belonging to the accountholders to obtain and/or change information about the Stolen Credit Cards and then fraudulently used the Stolen Credit Cards to, among other things, make purchases at retail stores in New Jersey and elsewhere.

Defendants and Co-Schemers Obtained the Stolen Credit Cards

4. The investigation revealed that defendant HAKIR BROWN and the above individuals supplied each other with checks and the Stolen Credit Cards. For instance, HAKIR BROWN, Salter, and DBrown obtained the Stolen Credit Cards and checks from then USPS-employee Banks Oneal.

5. A review of a telephone seized from HAKIR BROWN also revealed that HAKIR BROWN supplied Salter and DBrown with stolen credit cards. For example, on or about August 28, 2020, HAKIR BROWN sent a text message to Salter offering to supply Salter with stolen credit cards – referred to as “new work” – and attempting to arrange to meet. During their conversation, Salter told HAKIR BROWN that Salter was traveling and would not be able to take the cards himself, but told HAKIR BROWN, “I got my mans around for me thou[,]” namely, that HAKIR BROWN should contact Salter’s associate in Salter’s stead. HAKIR BROWN replied to Salter, “send me his number[,]” Salter agreed, and provided HAKIR BROWN with DBrown’s telephone number. Approximately one minute after receiving DBrown’s telephone number from Salter, HAKIR BROWN sent a text message to DBrown. DBrown asked HAKIR BROWN, “Who is this[,]” and HAKIR BROWN replied, “haddie mans told me to hit you[,]” namely, HAKIR BROWN identified himself as “haddie mans” – or Haddie’s man, with “Haddie” being a nickname for Salter. DBrown then replied, “Already” “Just let me know when you ready[,]” agreeing to meet HAKIR BROWN. The conversation that followed indicated that HAKIR BROWN met DBrown

approximately less than two hours after their first contact. The next day, Salter sent HAKIR BROWN a text message that read, "You linked bro[.]" and HAKIR BROWN replied, "Yea I did[.]" acknowledging that HAKIR BROWN met DBrown and supplied DBrown with stolen credit cards.

6. On or about September 6, 2020, HAKIR BROWN sent a text message to Salter that read, "wells just came in you want em[.]" indicating that HAKIR BROWN was in possession of multiple Wells Fargo credit cards that had been issued to third parties and offered to sell them to Salter. Salter replied, "Yes all of them" and "how man y[.]" indicating that Salter agreed to purchase the Stolen Credit Cards. The messages that followed indicated that HAKIR BROWN and Salter met the next day, in or around Newark, to complete the sale.

7. On or about June 17, 2021, HAKIR BROWN was arrested in Newark for driving a vehicle that had been reported stolen. Incident to HAKIR BROWN's arrest, law enforcement seized, among other items, four cellular telephones, one of which had a credit card in a third-party's name located between the cellular telephone and the telephone's case; HAKIR BROWN's wallet, which contained 8 credit/debit cards in different names; and Louis Vuitton-brand black leather handbag, which contained approximately 53 credit/debit cards, at least approximately 47 of which were still attached to mailers.

Unauthorized Use of Stolen Credit Cards

8. The investigation revealed that, during periods between in or about January 30, 2020 and in or about June 17, 2021, HAKIR BROWN, Salter, DBrown, and Banks Oneal each called at least one of the Financial Institutions regarding Stolen Credit Cards.

9. 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 \$307,584.41 in fraudulent charges were attempted on the Stolen Credit Cards about which telephone numbers used by HAKIR BROWN, Salter, DBrown, and/or Banks Oneal called. The fraud resulted in an actual loss of approximately \$207,887.47.

10. HAKIR BROWN used three telephone numbers associated with the cellular telephones that were seized on June 17, 2021 to contact Synchrony Bank ("Synchrony") approximately 77 times between on or about January 30, 2020 and on or about May 30, 2021 regarding approximately 32 credit cards, including regarding three of the credit cards seized from HAKIR BROWN on or about June 17, 2021. Approximately 28 of the credit cards about which HAKIR

BROWN called Synchrony were either logged as not delivered or lost/stolen by Synchrony between on or about January 1, 2020 and on or about May 22, 2021, according to Synchrony. Fraud was reported as occurring on all of those 28 credit cards. Synchrony reported a total attempted fraud amount on the 28 credit cards of approximately \$43,751.14.

11. For example, on or about February 26, 2021, HAKIR BROWN used one of the telephones seized on or about June 17, 2021 to call Synchrony once regarding a credit card issued to Accountholder-A (“Account-A”) and, between on or about March 2, 2021 and on or about March 18, 2021, HAKIR BROWN used a second telephone that was seized on or about June 17, 2021 to call Synchrony approximately 9 times regarding Account-A.

12. Earlier, on or about February 22, 2021, the credit card associated with Account-A was shipped by Synchrony via U.S. mail from in or around Omaha, Nebraska to Accountholder-A in Edison, New Jersey. Synchrony’s records indicate that the credit card was not received by Accountholder-A.

13. Between on or about March 7, 2021 and on or about March 17, 2021, Account-A was used without Accountholder-A’s authorization approximately 6 times to purchase goods totaling approximately \$10,237.36 from Bayonne, Union, Phillipsburg, New Jersey locations of the same home improvement store chain and on the home improvement store’s website. A seventh attempted purchase using Account-A, for approximately \$1,520, was declined.

14. Additionally, a review of a telephone seized from HAKIR BROWN also revealed that HAKIR BROWN also provided personal identifying information for the accountholders of some of the Stolen Credit Cards to Banks Oneal to enable Banks Oneal’s use of certain of the Stolen Credit Cards.⁴

15. For example, on or about June 14, 2021, Banks Oneal sent HAKIR BROWN a text message in which she wrote, “. . . need to go to the mall and shop rite I need some pieces[,]” informing HAKIR BROWN that she was about to go shopping and needed stolen credit cards – referred to as “pieces” – to pay for her purchases. Shortly thereafter, HAKIR BROWN sent a text message to Banks Oneal stating, “is it any pieces ina house[,]” asking Banks Oneal if any

⁴ 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 Stolen Credit Cards directly from Banks Oneal – who stole the Stolen Credit Cards in the course of her employment by the USPS in Kearny, New Jersey – 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).

there were any stolen credit cards in her house. Banks Oneal sent HAKIR BROWN a text message containing an image of a credit card mailer addressed to a third party at an address in or around Irvington, New Jersey. Banks Oneal then wrote, in two text messages, "Could u get the info for that we still here . . .[,] " and "This was the only one you have everything else[.]" Hakim Brown replied, "On it[.]" Banks Oneal then sent HAKIR BROWN a second image of a credit card mailer addressed to a third party at an address in or around North Arlington, New Jersey and wrote "This one 2 if u can wya[.]" These text messages indicate that Banks Oneal planned to use the credit cards attached to the mailer and HAKIR BROWN agreed to provide her with personal identifiers for the individuals to whom the credit cards were issued so that they could be used.