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

UNITED STATES OF AMERICA : Hon. André M. Espinosa, U.S.M.J.
 :
 v. : Mag. No. 21-11127 (AME)
 :
 KHADIJAH BANKS ONEAL : **CRIMINAL COMPLAINT**
 :
 :

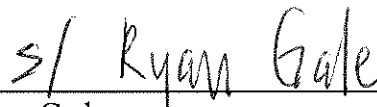
I, Ryan Gale, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

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

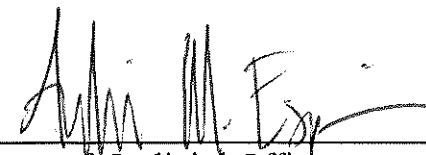
Continued on the attached page and made a part hereof:



Ryan Gale
Postal Inspector
U.S. Postal Inspection Service

Attested to by telephone pursuant to
Fed. R. Crim. P. 4.1 on July 27, 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 Access Device Fraud)

Between at least in or about August 2019 and at least on or about March 29, 2021, in Hudson County, in the District of New Jersey and elsewhere, defendant

KHADIJAH BANKS ONEAL

did conspire with others to knowingly and with intent to defraud traffic in and use one or more unauthorized access devices, namely, credit cards, during a one-year period, and by such conduct obtained things of value aggregating \$1,000 and more during that period, in a manner affecting interstate commerce, contrary Title 18, United States Code, Sections 1029(a)(2).

In violation of Title 18, United States Code, Sections 1029(b)(2) and (c)(1)(A)(i).

COUNT 2

(Theft of Mail)

Between at least on or about February 4, 2021 and at least on or about March 29, 2021, in Hudson County, in the District of New Jersey and elsewhere, defendant

KHADIJAH BANKS ONEAL

did knowingly and intentionally steal, take, and abstract from out of any mail, post office, and station thereof, letters and mails, and did abstract and remove from such letters and mails, articles and things contained therein.

In violation of Title 18, United States Code, Section 1708 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 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. The contents of documents and the actions, statements, and conversations of individuals referenced below are provided in substance and in part, unless otherwise indicated. Quoted text messages are set forth verbatim.

1. Since in or about December 8, 2018, KHADIJAH BANKS ONEAL ("BANKS ONEAL") has been employed by the United States Postal Service ("USPS") at the United States Postal Service's Dominick V. Daniels Mail Processing and Distribution Center in Kearny, New Jersey (the "DVD Center"), and is presently employed at the DVD Center as a mail processing clerk.

2. An investigation by the USPIS and the United States Postal Inspection Service – Office of the Inspector General ("USPS-OIG") revealed that BANKS ONEAL stole from the United States Mail (the "U.S. Mail") credit cards and United States Treasury Checks and sold those credit cards and United States Treasury Checks to others from at least in or about February 4, 2021 through at least in or about March 29, 2021.

3. For example, on or about February 20, 2021, after having worked a shift at the DVD Center that afternoon, while in New Jersey, BANKS ONEAL and an individual to whom BANKS ONEAL sold stolen U.S. Mail ("Individual-1") exchanged text messages regarding BANKS ONEAL's theft of credit cards issued by J.P. Morgan Chase Bank, N.A. ("Chase") from the U.S. Mail and her plans to steal more letters and mail from the U.S. Mail. Namely, BANKS ONEAL sent a text message to Individual-1 that stated, "I was only able to grab a few chase idk if it was the snow but everything was done early today shit was light[.]" Shortly thereafter, Individual-1 replied asking, "And which chase was it[.]" BANKS ONEAL responded, "Some freedoms[.]" which referred to Chase Freedom-branded credit cards. Later in the conversation, BANKS ONEAL assured Individual-1 that she would steal more United States mail the following day in a text message, which stated, "Ok regardless I'm going in tomorrow I have to I know I'll be able to grab grab some other stuff for you[.]"

4. On or about March 22, 2021, beginning while she was working her noon to approximately 8:30 p.m. shift at the DVD Center, BANKS ONEAL communicated via text message with Individual-1 regarding BANKS ONEAL selling stolen mail to Individual-1. BANKS ONEAL sent a text message to Individual-1 stating, "If I want you can come Get the pieces out the car and

leave the money like we did last time[.]” Individual-1 agreed to go to BANKS ONEAL’s car, which was parked outside of the DVD Center, stating “Okay[.] I come in hour[.]” BANKS ONEAL then directed Individual-1 as to where Individual-1 could locate the stolen mail within BANKS ONEAL’s car, writing, “ok the door opened they on the floor underneath my Jean jacket on the passenger side[.]” Later in the conversation, Individual-1 asked BANKS ONEAL whether the mail she stole included stimulus checks issued by the United States Department of Treasury, writing “Was it stimmy ?[.]” to which BANKS ONEAL replied, “No not today[.]” Individual-1 sent a text message to BANKS ONEAL confirming that he picked up the stolen mail and had left payment for BANKS ONEAL in her car, writing, in part, “I put 3k In glove bout to count how many and tell huh difference[.]” Shortly thereafter, Individual-1 told BANKS ONEAL that the stolen mail he took from her car included 24 credit cards and 1 check, writing, “I’m taking 24[.] And it was 1 check[.] And some other bs envelopes[.]” After her shift, BANKS ONEAL sent a text message to Individual-1 telling Individual-1 that Individual-1 had left behind some of the stolen mail in BANKS ONEAL’s car. In response, Individual-1 asked BANKS ONEAL what Individual-1 left behind, writing, “What are they[?]”

5. The next day, on or about March 23, 2021, Individual-1 and BANKS ONEAL’s text message conversation regarding the stolen U.S. Mail continued. Individual-1 texted BANKS ONEAL, “You open them[.]” instructing BANKS ONEAL to open the stolen mail. BANKS ONEAL opened the mail as indicated by her reply to Individual-1, which stated, “Targets ,AE NEW ACC,. Cities ,gap visa 15, 000 and 9,000[.]” indicating that she found within the stolen mail, credit cards issued by Target, an American Express or American Eagle credit card that was issued for the first time on a new account, Citibank credit cards, and a Gap Visa credit card.

6. The investigation also revealed that, between on or about August 30, 2019 and on or about February 16, 2021, BANKS ONEAL called multiple banks regarding credit cards issued to third parties, many of which have been reported lost, stolen, or not received.

7. For example, between on or about August 30, 2019 and on or about February 16, 2021, BANKS ONEAL called Synchrony Bank (“Synchrony”) regarding approximately 52 credit cards that were issued to other people, many of which were reported by Synchrony as lost, stolen, or not received. During these calls, BANKS ONEAL activated approximately 35 credit cards. Approximately \$21,239.93 in fraudulent charges were attempted on the Synchrony-issued credit cards about which BANKS ONEAL called Synchrony.