

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Criminal No. 12-
 :
 v. : 18 U.S.C. §§ 1344, 1028A, 1029(a)(5) & § 2
 :
 ABDULLAH BRYANT : INDICTMENT

The Grand Jury in and for the District of New Jersey, sitting at Newark, charges:

COUNT 1
(Bank Fraud)

At all times relevant to this Indictment:

1. Defendant ABDULLAH BRYANT was a resident of Irvington, New Jersey;
2. JP Morgan Chase, N.A. ("Chase Bank") was a financial institution, as that term is defined by 18 U.S.C. § 20.
3. In or about September 2011, in Morris, Union, and Essex Counties, in the District of New Jersey and elsewhere, defendant

ABDULLAH BRYANT

did knowingly execute and attempt to execute a scheme and artifice, to defraud a financial institution, namely JP Morgan Chase Bank, N.A., ("Chase Bank") and to obtain money, funds, and assets owned by and under the custody and control thereof, by means of materially false and fraudulent pretenses, representations, and promises, including by making or causing to be made a fraudulent purchase of approximately \$2,487.91, using a Chase Bank credit card, on or about September 16, 2011.

OBJECT OF THE SCHEME

4. It was the object of the scheme and artifice for defendant ABDULLAH BRYANT to enrich himself by obtaining and using credit cards that were issued by Chase Bank to other individuals (the "Victim Account-Holders") and that defendant knew he was not authorized to use.

MEANS AND METHODS OF THE SCHEME

5. It was part of the scheme that defendant ABDULLAH BRYANT and others fraudulently induced Chase Bank to issue and send, via UPS, approximately 21 duplicate credit cards by making phone calls to Chase Bank in which defendant BRYANT and others impersonated the Victim Account Holders, falsely claimed that they needed replacement cards, and requested that the replacement cards be shipped to addresses different from those appearing in Chase's records.

6. It was also part of the scheme, that defendant ABDULLAH BRYANT then used four of the fraudulently obtained duplicate credit cards to purchase and attempt to purchase goods consisting primarily of luxury items, such as jewelry, and expensive electronic equipment, such as computers, as well as 3D and HD television sets, among other items, on or about the dates, locations and in the approximate amounts below:

Account	Approximate Date/ Time	Approximate Loss	Approximate Amount	Store	Location (New Jersey)
4836	9/16/11 7:35 PM	Actual	\$8,748.32	MACY'S	ROCKAWAY
4836	9/16/11 7:56 PM	Actual	\$58.00	DELTA	LEDGEWOOD
4836	9/16/11 8:09 PM	Intended	\$1,550.00	WALMART	LEDGEWOOD
4836	9/16/11 9:09 PM	Actual	\$908.12	VERIZON WIRELESS	SUCCASUNNA

Account	Approximate Date/ Time	Approximate Loss	Approximate Amount	Store	Location (New Jersey)
4836	9/16/11 9:20 PM	Actual	\$1,527.96	WALMART	LEDGEWOOD
4836	9/16/11 9:23 PM	Actual	\$900.00	WAL-MART	LEDGEWOOD
4836	9/16/11 9:55 PM	Actual	\$2,487.91	KOHL'S	MORRIS PLAINS
4836	9/16/11 10:36 PM	Actual	\$1,080.57	WAL-MART	ROCKAWAY
4836	9/16/11 10:39 PM	Actual	\$800.00	WAL-MART	ROCKAWAY
4836	9/16/11 10:54 PM	Actual	\$1,069.98	TARGET	ROCKAWAY
0148	9/20/11 5:25 PM	Intended	\$9,752.89	BEST BUY	UNION
0148	9/20/11 5:26 PM	Intended	\$5,809.99	BEST BUY	UNION
0148	9/20/11 5:44 PM	Actual	\$9,940.12	BEST BUY	UNION
0148	9/20/11 7:17 PM	Actual	\$48.00	DELTA	IRVINGTON
0148	9/20/11 7:58 PM	Intended	\$590.38	WAL-MART	OLD BRIDGE
0153	9/22/11 7:31 PM	Actual	\$7,334.72	BEST BUY	UNION
9032	9/22/11 9:22 PM	Actual	\$12,593.59	BEST BUY	UNION
9032	9/23/11 1:06 AM	Actual	\$53.46	PATHMARK	NEWARK
9032	9/23/11 10:49 AM	Actual	\$295.38	WHOLEFOODS	WEST ORANGE
9032	9/23/11 11:13 AM	Intended	\$502.48	MACY'S	WEST ORANGE
9032	9/23/11 11:14 AM	Intended	\$157.50	MACY'S	WEST ORANGE

The total loss attributable to the fraudulently obtained duplicate credit cards was approximately \$305,863.

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

**COUNTS 2 TO 5
(Aggravated Identity Theft)**

1. Paragraphs 1, 2 and 4 through 6 of Count 1 are incorporated by reference.

2. On or about the dates set forth below, in Morris, Union, and Essex

Counties, in the District of New Jersey and elsewhere, defendant

ABDULLAH BRYANT,

during and in relation to the bank fraud and credit card offenses set forth in Counts 1 and 6 to 9, which are felony offenses enumerated in subsection (c) of 18 U.S.C. § 1028A, did knowingly possess and use without lawful authority, the means of identification of other persons, as set forth below:

Count	Approximate Date	Account	Name of Actual Account Holder
2	9/16/11	4836	B.B.
3	9/20/11	0148	K.C.
4	9/22/11	0153	P.S.
5	9/23/11	9032	P.S.

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

COUNTS 6 TO 9
(Credit Card Fraud)

In or about September 2011, in Morris and Union Counties, in the District of New Jersey and elsewhere, defendant

ABDULLAH BRYANT

did knowingly, and with intent to defraud, effect transactions, with one or more access devices issued to another person or persons, to receive payment and things of value during a one-year period, the aggregate value of which was equal to and greater than \$1,000, including the following:

Count	Account	Approximate Date	Approximate Amount	Store	Location (New Jersey)
6	4836	9/16/11	\$1,069.98	TARGET	ROCKAWAY
7	0148	9/20/11	\$9,940.12	BEST BUY	UNION
8	0153	9/22/11	\$7,334.72	BEST BUY	UNION
9	9032	9/22/11	\$12,593.59	BEST BUY	UNION

In violation of Title 18, United States Code, Section 1029(a)(5) and Section 2.

FORFEITURE ALLEGATION

1. The allegations contained in this Indictment are hereby realleged and incorporated by reference for the purpose of noticing forfeiture pursuant to Title 18, United States Code, Sections 981(a)(1)(c), 982(a)(2) and Title 28, United States Code, Section 2461(c).

2. The United States hereby gives notice to the defendant, that upon his conviction of any of the offenses charged in Counts 1 and 6 through 9 of this Indictment, the government will seek forfeiture in accordance with Title 18, United States Code, Sections 981(a)(1)(c), 982(a)(2) and Title 28, United States Code, Section 2461(c), which requires any person convicted of an offense to forfeit any property constituting or derived from proceeds obtained directly or indirectly as a result of such offense.

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

- (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), to seek forfeiture of any other property of such defendant up to the value of the forfeitable property described in paragraph 2.

A TRUE BILL

FOREPERSON



PAUL J. FISHMAN
United States Attorney

CASE NUMBER: _____

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

UNITED STATES OF AMERICA

v.

ABDULLAH BRYANT

INDICTMENT FOR

18 U.S.C. §§ 1344, 1028A, 1029(a)(5) & § 2

A True Bill,

Foreperson

PAUL J. FISHMAN
U.S. ATTORNEY
NEWARK, NEW JERSEY

LORRAINE S. GERSON
ASSISTANT U.S. ATTORNEY
973-645-2789
