
UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

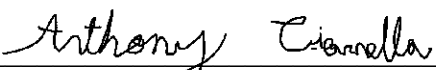
UNITED STATES OF AMERICA	:	CRIMINAL COMPLAINT
	:	
v.	:	Hon. Edward S. Kiel, U.S.M.J.
	:	
ABOUDRAMANE KARAMOKO,	:	Mag. No. 23-15260
SEKOU FOFANAH,	:	
SHAMAIRE BROWN, and	:	
QUAMAIRE BROWN	:	

I, Anthony Ciarnella, the undersigned complainant 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 Special Agent with Homeland Security Investigations of the Department of Homeland Security and that this complaint is based on the following facts:


SEE ATTACHMENT B



Anthony Ciarnella, Special Agent
Homeland Security Investigations

Special Agent Anthony Ciarnella attested to this Complaint by telephone pursuant to Fed. R. Crim. Pro. 4.1(b)(2)(A) on October 17, 2023 in the District of New Jersey

Honorable Edward S. Kiel
United States Magistrate Judge



Signature of Judicial Officer

ATTACHMENT A

COUNT ONE
(Conspiracy to Commit Cargo Theft)

From at least as early as in or around January 2021 through least as recently as in or around April 2023, in the District of New Jersey and elsewhere, the defendants,

**ABOUDRAMANE KARAMOKO,
SEKOU FOFANAH,
SHAMAIRE BROWN, and
QUAMAIRE BROWN,**

did knowingly and intentionally conspire and agree with each other and others to commit offenses against the United States, to wit, to knowingly embezzle, steal, unlawfully take, carry away, and conceal from any wagon, motortruck, trailer, other vehicle, storage facility, container freight station, and warehouse, goods and chattels of a value in excess of \$1,000, which goods and chattels constituted an interstate shipment of freight and other property, with the intent to convert the goods and chattels to their own use, contrary to Title 18, United States Code, Section 659.

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

ATTACHMENT B

I, Anthony Ciarnella, am a Special Agent with Homeland Security Investigations (“HSI”). I am fully familiar with the facts set forth herein based on my own investigation, my conversations with other law enforcement officers, and my review of reports, documents, and video recordings of the evidence. Because this Complaint is being submitted for a limited purpose, I have not set forth each and every fact that I know concerning this investigation. Where statements of others are related herein, they are related in substance and part. Where I assert that an event took place on a particular date, I am asserting that it took place on or about the date alleged.

Background Overview of the Conspiracy

1. Law enforcement, including HSI, is investigating Aboudramane Karamoko (“KARAMOKO”), Sekou Fofanah (“FOFANAH”), Shamaire Brown (“SHAMAIRE”), and Quamaire Brown (“QUAMAIRE”) for their participation in a conspiracy to commit with each other, and others known and unknown (each a “Conspirator”), burglaries of United Parcel Service (“UPS”) facilities throughout the United States beginning at least as early as January 2021 and continuing through at least as recently as April 2023 (the “Conspiracy”).

2. During that period, the Conspirators sought to enrich themselves by stealing property from UPS warehouses, including Apple products and other electronics. In total, law enforcement has identified approximately \$1.6 million worth of merchandise that was stolen by the Conspirators from approximately 55 UPS facilities throughout the United States as part of the Conspiracy.

3. At all times relevant to this Complaint:

a. The defendants, KARAMOKO, FOFANAH, SHAMAIRE, and QUAMAIRE, were all residents of Philadelphia, Pennsylvania.

b. UPS was a major global logistics company headquartered in Georgia that, among other services, provided interstate and foreign shipment services to its customers. To facilitate those services, UPS maintained a network of warehouses operating as waypoints for goods and chattels in transit.

4. The burglaries committed as part of the Conspiracy have exhibited a common pattern:

a. They would usually occur on weekends, when UPS facilities are closed;

b. The Conspirators would break into the targeted UPS facility overnight on Saturday into Sunday;

c. The Conspirators would operate in teams of four to six, dressed all in black and wearing balaclavas or other face or head coverings;

d. The Conspirators would unlawfully enter the targeted UPS facility by breaking the window of the loading bay door or by prying the loading bay door up so that a Conspirator smaller in stature could squeeze through;

e. Once inside the Target Location, the Conspirators would look for parcels marked with “lithium-ion battery” warnings, which denote that a high-value electronic device such as a cell phone is probably inside; and

f. When law enforcement would arrive at the targeted facility, the Conspirators would flee by vehicle or on foot.

Specific Burglaries in Furtherance of the Conspiracy

5. Evidence obtained during this investigation shows that the Conspirators, including KARAMOKO, FOFANAH, SHAMAIRE, and QUAMAIRE, executed at least the following burglaries as part of the Conspiracy:

Philadelphia, PA

6. On or about January 31, 2021, at approximately 1:48 a.m., law enforcement observed approximately ten individuals enter a UPS Warehouse located at 1 Hog Island Road, Philadelphia, PA 19153. The officers arrested certain individuals at the scene, including FOFANAH and SHAMAIRE.

Lawnside, NJ

7. On or about June 20, 2021, between approximately 5:16 p.m. and 5:36 p.m., security footage showed three individuals enter the UPS facility located at 301 East Oak Avenue, Lawnside, NJ 08045 (the “Lawnside Warehouse”). The security footage showed these individuals going through packages in various trailers.

8. At approximately 5:20 p.m. on that day – the same time that the three individuals were inside the Lawnside Warehouse – law enforcement responded to a call of a red Nissan Altima with temporary Delaware license plates (the “Nissan”) parked in the road outside of the Lawnside Warehouse.

9. Upon approaching the Nissan, law enforcement observed that the Nissan was empty and saw a phone and a driver’s license on the driver’s side

seat. The driver's license listed the name and address of FOFANAH. The officers had the Nissan towed.

10. At approximately 8:08 p.m. on June 20, 2021, the officers were called back to the Lawnside Warehouse based on a report of three individuals acting suspicious. The officers approached the three individuals, who were sitting on the curb in front of the Lawnside Warehouse. One of the individuals identified himself as FOFANAH and stated he was the owner of the Nissan and that the Nissan had broken down. The other two individuals provided names which law enforcement later learned were false.

11. After FOFANAH and the other two individuals left the area, law enforcement found a bag near a construction trailer across from the Lawnside Warehouse, feet from where FOFANAH and the other two individuals had been sitting. Officers found multiple Apple products and a taser inside the bag.

12. Upon later reviewing the security footage, law enforcement recognized one of the three individuals as FOFANAH based on the conversation they had with him on or about June 20, 2021.

13. Further investigation revealed a telephone number for KARAMOKO ending in 2534 (the "Karamoko Phone-1"). Review of historical cell site information revealed that, on or about June 20, 2021, at approximately 7:25 p.m., 8:48 p.m., and 11:44 p.m., and on or about June 21, 2021 at approximately 9:11 a.m., the Karamoko Phone-1 was located near a cell tower on 222 Clements Bridge Road, Barrington, NJ 8007, an approximate 6-minute drive from the Lawnside Warehouse.

14. Further investigation revealed a telephone number for FOFANAH ending in 2697 (the "Fofanah Phone"). Review of historical cell site information revealed that, on or about June 21, 2021, at approximately 11:46 a.m. and 11:59 a.m., the Fofanah Phone was located near the same cell tower.

15. According to UPS records, approximately \$23,707 worth of electronics were stolen from the Lawnside Warehouse. A review of waybill¹ data revealed that certain stolen packages had arrived in New Jersey from Illinois, among other states.

Vineland, NJ

16. On or about June 27, 2021, at approximately 4:00 a.m., security footage showed four individuals exiting a vehicle and walking towards a UPS facility located at 3731 North Mill Road, Vineland, NJ 08360 (the "Vineland

¹ A "waybill" is a document prepared by a carrier of a shipment of goods that contains details of the shipment, route, and charges.

Warehouse”). At approximately 5:12 a.m., the security footage showed the four individuals return to the car and put unidentified items in the trunk before driving away.

17. Review of historical cell site information revealed that, on or about June 27, 2021, at approximately 4:09 a.m., the Karamoko Phone-1 was located near a cell tower on 3880 Willow Drive, Vineland, NJ 08344, an approximate 2-minute drive from the Vineland Warehouse. Further review of historical cell site information revealed that, on or about June 27, 2021, at approximately 4:09 a.m. and 5:09 a.m., the Fofanah Phone was located near the same cell tower.

18. According to UPS records, approximately \$17,405 worth of electronics and a Smith and Wesson handgun were stolen from the Vineland Warehouse. A review of waybill data revealed that certain stolen packages had arrived in New Jersey from Texas and Florida, among other states.

Monroe Township, NJ

19. On or about June 5, 2022, at approximately 3:19 a.m., security footage showed four individuals enter a UPS facility located at 100 Middlesex Center Boulevard South, Jamesburg, NJ 08831 (the “Monroe Township Warehouse”) and exit at approximately 5:22 a.m. holding nylon bags.

20. A review of historical cell site information revealed that:

a. on or about June 5, 2022, at approximately 4:16 a.m., QUAMAIRE’s phone number ending 8602 (the “Quamaire Phone”) called the Karamoko Phone-1 off a cell tower located at 320 Middlesex Center Boulevard, Monroe Township, NJ 08831, an approximate 1-minute drive from the Monroe Township Warehouse;

b. on or about June 5, 2022, at approximately 4:18 a.m., SHAMAIRE’s phone number ending 8515 (the “Shamaire Phone”) called the Karamoko Phone-1 from the same cell tower; and

c. on or about June 5, 2022, at approximately 4:04 a.m. and 5:28 a.m., the Karamoko Phone-1 was located near the same cell tower.

21. According to UPS records, approximately \$84,741 worth of electronics were stolen from the Monroe Township Warehouse. A review of waybill data revealed that certain stolen packages had arrived in New Jersey from California and Michigan, among other states.

Bridgewater, NJ

22. On or about June 12, 2022, at approximately 1:00 a.m., security footage showed 3 individuals enter a UPS facility located at 16E Chimney Rock Road, Bridgewater, NJ 08807 (the "Bridgewater Warehouse") and exit at approximately 5:07 a.m. holding bags.

23. A review of historical cell site data revealed that, on or about June 12, 2022, the Quamaire Phone called the Karamoko Phone-1 at approximately 4:40 a.m. and the Shamaire Phone at approximately 4:50 a.m., both from a cell tower located on Chimney Rock Road, Bridgewater, NJ. The historical cell site data also showed that, on or about June 12, 2022 at approximately 4:40 a.m., the Karamoko Phone-1 was located near the same cell tower.

24. According to UPS records, approximately \$40,100 worth of electronics were stolen from the Bridgewater Warehouse. A review of waybill data revealed that certain stolen packages had arrived in New Jersey from California and New York, among other states.

Clarkstown, NY

25. On or about August 7, 2022, at approximately 3:33 a.m., security footage showed 6 individuals enter a UPS facility at 31 Murray Hill Drive, Nanuet, NY 10954 (the "Clarkstown Warehouse").

26. At approximately 4:00 a.m. on or about August 7, 2022, law enforcement responded to an ongoing burglary at the Clarkstown Warehouse and arrested an uncharged coconspirator ("CC-1") at the scene.

27. Review of historical cell site data showed that, on or about August 7, 2022, at approximately 1:07 a.m., 1:12 a.m., 1:15 a.m., and 1:49 a.m., the Karamoko Phone-1 called CC-1's phone number ending 0605 off a cell tower located at 308-330 West Route 59, Clarkstown, NY 10977, an approximate 8-minute drive from Warehouse-6. Further review of the historical cell site data showed that, on or about August 7, 2022, at approximately 4:10 a.m., 4:14 a.m., and 4:48 a.m., the Quamaire Phone called CC-1's phone number ending 0605 off the same cell tower.

28. A review of Cellebrite records connected to CC-1's phone number ending 0605 showed that, on or about August 6, 2022, at approximately 10:50 p.m., the Karamoko Phone-1 texted CC-1: "31 Murray Hill Dr Nanuet, NY 10954 United States," *i.e.*, the location of Warehouse-6. Later, on or about August 7, 2022, at approximately 3:52 a.m., CC-1 texted the Karamoko Phone-1: "Y'all in?"

29. According to UPS records, approximately \$10,200 worth of electronics were stolen from Warehouse-6. A review of waybill data revealed that certain stolen packages arrived in New York from Florida and Texas, among other states.

Gloversville, NY

30. On or about October 17, 2022, at approximately 3:53 a.m., law enforcement responded to a reported break-in at a UPS facility located at 112 Van Road, Johnstown, NY 12078 (the “Gloversville Warehouse”).

31. Lab reports for DNA found on the scene of the break-in returned with a positive match to a sample previously associated with KARAMOKO.

32. Review of historical cell site data showed that, on or about October 16, 2022, at approximately 1:32 a.m., the Shamaire Phone was near a cell tower located at 45 Eisenhower Drive, Paramus, NJ 07652, which is in route from Philadelphia, PA to the Gloversville Warehouse.

33. According to UPS records, approximately \$12,119 worth of electronics were stolen from the Gloversville Warehouse.

Elkhart, IN

34. On or about January 8, 2023, at approximately 3:14 a.m., security footage showed 4 individuals approach a UPS facility located at 1600 West Hively Avenue, Elkhart, IN 46517 (the “Elkhart Warehouse”).

35. On or about January 8, 2023, at approximately 9:01 a.m., an Ohio police officer stopped a silver Audi bearing Delaware temporary license plates (the “Audi”) that was traveling east bound on I-80 exceeding the speed limit. The officer smelt marijuana upon approaching the vehicle. The driver of the Audi was identified as KARAMOKO, and one of the four passengers was identified as SHAMAIRE. All five occupants of the Audi were detained, and the officer performed a probable cause search of the Audi, whereby a large quantity of packaged electronics was found. KARAMOKO and SHAMAIRE claimed they had purchased the electronics but could not produce receipts. Two of the other individuals provided inconsistent accounts explaining the products, so law enforcement held onto the electronics.

36. Thereafter, law enforcement contacted Verizon, who confirmed that some of the electronics found in the Audi were sent via UPS and never reached their destination. On or about February 20, 2023, KARAMOKO arrived at the Ohio precinct to retrieve the electronics and was arrested for receiving stolen property.

37. Review of historical cell site information revealed that, on or about January 8, 2023, at approximately 3:53 a.m. and 4:46 a.m., the Shamaire Phone called KARAMOKO’s second phone number ending 1766 (the “Karamoko Phone-2”) from a cell tower located at 2031 W Mishawaka Road, Elkhart, IN 46517, an

approximate 2-minute drive from the Elkhart Warehouse. Further review of historical cell site information revealed that, on or about January 8, 2023, at approximately 10:47 a.m., the Karamoko Phone-2 was near a cell tower located at 3038 Boston Mills Rd, Richfield, OH 44286. The historical cell site data also showed that, at or about 10:59 a.m. and 11:24 a.m. the same day, the Shamaire Phone was located near the same Ohio cell tower.

38. According to UPS records, approximately \$58,000 worth of electronics were stolen from the Elkhart Warehouse. A review of waybill data revealed that certain stolen packages had arrived in Indiana from Florida, Illinois, and California, among other states.

Warwick, RI

39. On or about April 2, 2023, at approximately 5:23 a.m., law enforcement responded to an ongoing burglary at a UPS facility located at 150 Plan Way, Warwick, RI 02888 (the “Warwick Warehouse”). As officers entered Warehouse-9, they observed three suspects fleeing. The officers canvassed the surrounding area and eventually found and arrested two of the Conspirators hiding in an open garage nearby. The two suspects were identified as KARAMOKO and SHAMAIRE. SHAMAIRE was carrying a box cutter, two lock pics, and a black ski mask. Officers found a backpack filled with electronics directly outside the Warwick Warehouse.

40. Review of historical cell site information revealed that, on or about April 2, 2023, at approximately 3:29 a.m. and 3:49 a.m., the Karamoko Phone-2 called the Shamaire Phone from a cell tower located at 289 Kilvert Street, Warwick, RI 02886, an approximate 4-minute drive from Warehouse-9.

41. According to UPS records, the electronics found near the Warwick Warehouse were worth approximately \$32,000. A review of waybill data revealed that certain of the stolen packages had arrived in Rhode Island from Pennsylvania and Indiana, among other states.

Coordination of the Conspiracy

42. Records obtained from “Platform-1,” a major social media platform with direct-messaging functionality, in response to a lawfully obtained search warrant reveal that the Conspirators frequently used various group chats to communicate about the UPS Warehouse burglaries in furtherance of the conspiracy.

43. Specifically, and among other examples, a Platform-1 group chat including accounts that law enforcement has determined based on investigation to be controlled by KARAMOKO, FOFANAH, QUAMAIRE, SHAMAIRE, and others, titled the “ALL GRIND” group chat (the “ALL GRIND Group Chat”), was used by

the Conspirators to coordinate UPS burglaries. For example, on or about March 28, 2021, at approximately 8:56 p.m., an uncharged coconspirator sent a message to the ALL GRIND Group Chat asking, "Ups ?" QUAMAIRE then responded, "rn?" That same uncharged coconspirator then replied, "Yeah."

44. After burglarizing UPS warehouses, the Conspirators would discuss the merchandise they stole by sending photographs into the Platform-1 group chats. For example, on or about June 7, 2022, two days after the burglary of the Monroe Township Warehouse described above, KARAMOKO sent a picture to a Platform-1 group chat including FOFANAH and QUAMAIRE of a male wearing a mask and holding several Apple product containers.

45. As another example, on or about June 13, 2022, one day after the burglary of the Bridgewater Warehouse, KARAMOKO sent into a Platform-1 group chat including FOFANAH and QUAMAIRE:

a. One picture of a male holding numerous containers of Apple iPhones while seated in the back seat of a car, and

b. A second picture of an individual who was cropped out of the photo but seen holding numerous boxes of what appear to be Apple products. Text was overlaid over the second picture which reads "Them boys can't be f[****]d wit wallahi."

46. On or or about July 13, 2022, an uncharged coconspirator referred to KARAMOKO, FOFANAH, and QUAMAIRE in the ALL GRIND Group Chat, as "Ups boys."

47. The Conspirators in the Platform-1 chats would also express their desire to limit participation in the UPS burglaries to only those coconspirators in the Platform-1 group chats. For example:

a. On or about October 2, 2022, KARAMOKO messaged into the ALL GRIND Group Chat that "Y'all n[****]s got county n[****]s going up to ups."

b. On or about October 4, 2022, KARAMOKO messaged into the ALL GRIND Group Chat that "U [p]ut da whole city on cous" and "How did it go from n[****]s in da group chat to n[****]s outside the group chat."

c. QUAMAIRE responded to KARAMOKO in the ALL GRIND Group Chat by writing "that's my homie" and "im done talking wtf."

d. KARAMOKO then wrote "Showing n[****]s how we make our bread" and another user in the ALL GRIND Group Chat asked QUAMAIRE, "U think if vell was hitting ups he was gonna include you ?"

Based on training, experience, and investigation, it appears in these messages that QUAMAIRE included someone not in the ALL GRIND Group Chat in a UPS burglary and KARAMOKO and that other coconspirators were reprimanding QUAMAIRE for doing so.

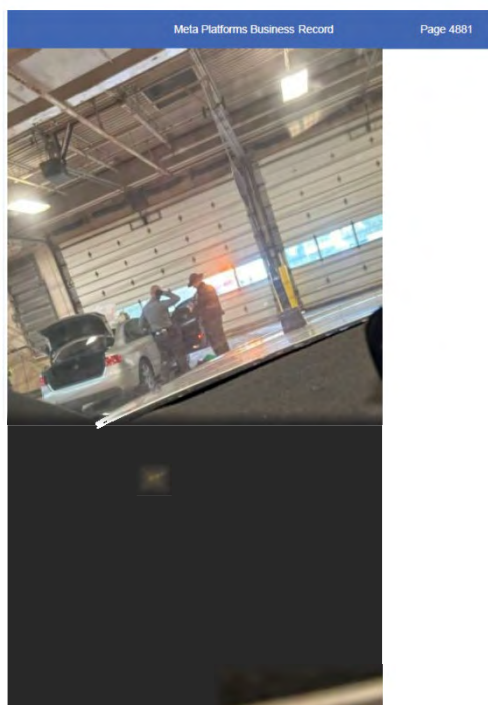
48. Finally, the Conspirators would discuss their concerns regarding law enforcement in the Platform-1 group chats. For example:

a. On or about August 9, 2022, 2 days after the burglary of the Clarkstown Warehouse, articles related to the Clarkstown Warehouse burglary were shared into the ALL GRIND Group Chat.

b. An uncharged coconspirator wrote into the ALL GRIND Group Chat: “Ups getting looked at by the feds” and “7 robberies in 5 weeks + more.”

c. Another uncharged coconspirator then responded to the ALL GRIND Group Chat: “[b]ro ups building a beautiful a[**] indictment rn [probably, “right now”].”

49. On or about January 8, 2023, the day of the Elkhart Warehouse burglary, SHAMAIRE texted into the ALL GRIND Group Chat: “[w]e detained in Ohio, mir was speeding !” An uncharged coconspirator responded, “[t]hey searched the wheel?” SHAMAIRE then sent a picture into the ALL GRIND Group Chat of the police warehouse where their car was held, as shown below:



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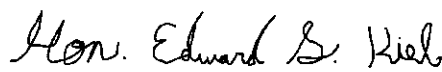
SEALING ORDER

Upon application of the United States (by Jake A. Nasar, Assistant United States Attorney, appearing) for an order sealing the Complaint, arrest warrants, and all supporting papers in the above-captioned matter, and good and sufficient cause having been shown,

IT IS on this 17th day of October 2023,

ORDERED that the Complaint and all supporting papers in the above-captioned matter be sealed, except for such copies of the arrest warrants, Complaint, or supporting papers, if any, that are needed to effectuate its purpose, until the arrest warrant is executed or until further order of the Court.

IT IS FURTHER ORDERED that, once the arrest warrant is executed, the Complaint, arrest warrants, and this Order be and are hereby unsealed.



HONORABLE EDWARD S. KIEL
U.S. MAGISTRATE JUDGE