

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

UNITED STATES OF AMERICA	:	Hon.
	:	
v.	:	Crim. No. 24-
	:	
SHAMAIRE BROWN	:	18 U.S.C. § 371
	:	18 U.S.C. § 659

INFORMATION

The defendant having waived in open court prosecution by Indictment, the United States Attorney for the District of New Jersey charges:

Relevant Individuals and Entities

1. At all times relevant to this Information, United Parcel Service (“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 national network of warehouses operating as waypoints for goods and chattels in transit.

The Conspiracy

2. From in or around January 2021 through in or around April 2023, in Middlesex, Somerset, Camden, and Cumberland Counties, in the District of New Jersey and elsewhere, the defendant,

SHAMAIRE BROWN,

did knowingly and intentionally conspire and agree with others to commit an offense against the United States, that is, to knowingly steal, unlawfully take and carry away goods valued at \$1,000 or more, namely, packages containing electronics, among other items, from warehouses, with intent to convert the goods to their own

use, which goods were moving as, and which were part of, and which constituted an interstate and foreign shipment of freight and property, contrary to Title 18, United States Code, Section 659.

The Object of the Conspiracy

3. The object of the conspiracy was for the defendant, SHAMAIRE BROWN (“BROWN”), and his co-conspirators (together, the “Conspirators”) to enrich themselves by burglarizing UPS warehouse facilities to steal and thereafter sell the stolen packages, which consisted primarily of cellular phones and other electronic products.

Manner and Means of the Conspiracy

4. It was a part of the conspiracy that BROWN and the Conspirators burglarized numerous UPS warehouses in the District of New Jersey and elsewhere, stole multiple packages containing electronic products and other items, and sold the contents of those packages.

5. Using the manner and means described above, BROWN and the Conspirators burglarized approximately 55 UPS facilities and stole packages which had traveled in interstate commerce and had a value totaling approximately \$1.6 million.

Overt Acts

6. In furtherance of the conspiracy, the following overt acts, among others, were committed in the District of New Jersey, and elsewhere:

a. On or about June 5, 2022, BROWN and the Conspirators burglarized a UPS facility located in Monroe Township, New Jersey, stealing multiple packages containing electronic products and other items. The packages arrived in New Jersey from multiple locations including California and Michigan, among other states, and contained electronics valued at approximately \$84,741.

b. On or about June 12, 2022, BROWN and the Conspirators burglarized a UPS facility located in Bridgewater, New Jersey, stealing multiple packages containing electronic products and other items. The packages arrived in New Jersey from multiple locations including California and New York, among other states, and contained electronics valued at approximately \$40,100.

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

FORFEITURE ALLEGATION

1. Upon conviction of the offense contrary to 18 U.S.C. § 659, in violation of 18 U.S.C. § 371, as charged in this Information, defendant BROWN shall forfeit to the United States, pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), all property, real and personal, the defendant obtained that constitutes or is derived from proceeds traceable to the commission of such offense, and all property traceable to such property.

SUBSTITUTE ASSETS PROVISION

2. 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 person;
- (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 subdivided without difficulty,

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), as incorporated by 28 U.S.C. § 2461(c), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.



PHILIP R. SELLINGER
United States Attorney

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INFORMATION FOR

18 U.S.C. § 371

18 U.S.C. § 659

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