

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA	:	Hon.
	:	
	:	Crim. No. 18-
v.	:	
	:	18 U.S.C. § 1349
	:	
CHAD BROWN	:	
	:	

I N F O R M A T I O N

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

COUNT ONE
(Conspiracy to Commit Bank Fraud)
(18 U.S.C. § 1349)

Background

1. At all times relevant to this Information:
 - a. Defendant CHAD BROWN ("BROWN") was a resident of Orange, New Jersey.
 - b. Defendant Yaseen Salih ("SALIH"), a co-conspirator, was a resident of East Orange, New Jersey.
 - c. "Victim Bank 1" and "Victim Bank 2" (collectively, the "Victim Banks") were financial institutions, as that term is defined in Title 18, United States Code, Section 20, and were insured by the Federal Deposit Insurance Corporation.

d. "Subject Bank Accounts" were actual bank accounts belonging to customers at Victim Bank 1 and Victim Bank 2.

The Conspiracy

2. From in or around September 2015 through in or around May 2017, in Essex County, in the District of New Jersey, and elsewhere, defendant

CHAD BROWN

did knowingly and intentionally conspire and agree with others to execute a scheme and artifice to defraud financial institutions, namely Victim Bank 1 and Victim Bank 2, and to obtain money and property owned by, and under the custody and control of, Victim Bank 1 and Victim Bank 2, by means of materially false and fraudulent pretenses, representations, and promises, contrary to Title 18, United States Code, Section 1344.

Object of the Conspiracy

3. It was the object of the conspiracy for CHAD BROWN and others to enrich themselves and others by obtaining funds from the Victim Banks by: (a) obtaining information from Subject Bank Accounts at Victim Bank 1 and Victim Bank 2; (b) having an unknown person pose as a bank employee to a teller at the Victim Bank in order to convince the teller to credit funds into the Subject Bank Accounts; and (c) using debit cards associated with the Subject Bank Accounts to obtain the fraudulently credited funds.

Manner and Means of the Conspiracy

4. It was part of the conspiracy that between in or around September 2015 and in or around May 2017, members of the conspiracy, including BROWN and SALIH, obtained information pertaining to the Subject Bank Accounts, including information relating to account numbers, personal identification numbers, and personal information of the account holders such as name and address.

5. It was further part of the conspiracy that members of the conspiracy, including BROWN and SALIH, also obtained debit cards associated with the Subject Bank Accounts.

6. It was further part of the conspiracy that members of the conspiracy, including BROWN and SALIH, approached account owners personally and requested access to the Subject Bank Accounts.

7. It was further part of the conspiracy that members of the conspiracy called tellers at the Victim Banks posed as employees of the Victim Banks, and convinced the Victim Bank tellers to credit funds into the Subject Bank Accounts.

8. It was further part of the conspiracy that, once funds were credited into the Subject Bank Accounts, members of the conspiracy, including BROWN and SALIH used debit cards associated with the Subject Bank Accounts to obtain the fraudulently credited funds. In some instances, members of the conspiracy withdrew funds from the subject accounts by withdrawing money from Automated Teller Machines at Victim Bank branch locations. In other instances,

members of the conspiracy used debit cards associated with the Subject Bank Accounts to purchase Postal Money Orders to conceal the source of the funds.

9. As a result of the foregoing conduct, Victim Bank 1 and Victim Bank 2 suffered total losses of more than approximately \$1,500,000.

All in violation of Title 18, United States Code, Section 1349.

FORFEITURE ALLEGATION

1. The allegations contained in Count One of this Information are hereby realleged and incorporated by reference for the purpose of alleging forfeiture, pursuant to Title 18, United States Code, Section 982(a)(2).

2. The United States hereby gives notice to defendant BROWN that, upon his conviction of the offenses alleged in Count One of this Information, the government will seek forfeiture in accordance with Title 18, United States Code, Section 982(a)(2), which requires any person convicted of such offenses to forfeit any property, real or personal, which constitutes or is derived from proceeds obtained directly or indirectly as a result of such offense, including but not limited to \$13,757.99 in United States currency.

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

- 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 28, United States Code, Section 2461(c),

to seek forfeiture of any other property of defendant BROWN up to the value of the forfeitable property described above.


CRAIG CARPENITO
United States Attorney