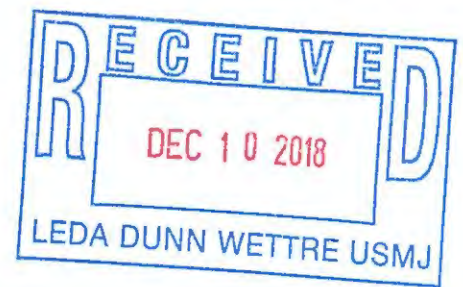


UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY



UNITED STATES OF AMERICA : Hon. Leda Dunn Wettre  
 :  
 v. : Mag. No. 18-8244  
 :  
 OLAGOKE ARAROMI : **CRIMINAL COMPLAINT**  
 ELHADJ FOFANA :  
 :


I, Brian J. Macdonald, 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:

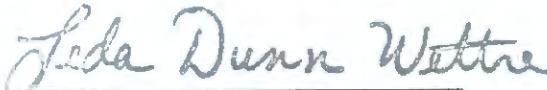
**SEE ATTACHMENT B**

continued on the attached page and made a part hereof.

  
\_\_\_\_\_  
Brian J. Macdonald, Postal Inspector  
United States Postal Inspection Service

Sworn to before me and  
subscribed in my presence,  
December 10<sup>th</sup>, 2018  
at Newark, New Jersey

HONORABLE LEDA DUNN WETTRE  
UNITED STATES MAGISTRATE JUDGE

  
\_\_\_\_\_  
Signature of Judicial Officer

**ATTACHMENT A**

**Count One**

**(Conspiracy to Commit Bank Fraud)**

From in or about July 2017 to in or about February 2018, in Bergen, Essex, Hudson, Monmouth, Somerset, and Union Counties, in the District of New Jersey, and elsewhere, defendants

OLAGOKE ARAROMI and  
ELHADJ FOFANA

knowingly and intentionally did conspire and agree with each other and others to execute a scheme and artifice to defraud financial institutions as defined in Title 18, United States Code, Section 20, whose deposits were insured by the Federal Deposit Insurance Corporation, and to obtain monies, funds, assets, and other property owned by and under the custody and control of such financial institutions, by means of materially false and fraudulent pretenses, representations, and promises, contrary to Title 18, United States Code, Section 1344.

In violation of Title 18, United States Code, Section 1349.

**Count Two**

**(Aggravated Identity Theft)**

On or about February 20, 2018, in Monmouth County, in the District of New Jersey, and elsewhere, defendants

OLAGOKE ARAROMI and  
ELHADJ FOFANA

did knowingly transfer, possess, and use, without lawful authority, a means of identification of another individual, namely a credit card of Accountholder 1 issued by Chase Bank, N.A., during and in relation to a felony violation of a provision contained in Chapter 63 of the United States Code, that is, conspiracy to commit bank fraud in violation of Title 18, United States Code, Section 1349 as charged in Count One of this Complaint.

In violation of Title 18, United States Code, Section 1028A(a)(1), and Section 2.

**Count Three**  
**(Bribery)**

From in or about September 2017 to in or about May 2018, in Essex and Hudson Counties, in the District of New Jersey and elsewhere, defendant

OLAGOKE ARAROMI

did, directly and indirectly, corruptly give, offer, and promise things of value, namely, United States currency, to public officials, namely, United States Postal Service employees, with intent to influence any official act and to induce such officials to do and omit to do acts in violation of their lawful duties.

In violation of Title 18, United States Code, Sections 201(b)(1)(A) and (C) and Section 2.

## **ATTACHMENT B**

I, Brian J. Macdonald, a Postal Inspector with the United States Postal Inspection Service, having personally participated in an investigation of the conduct of defendants OLAGOKE ARAROMI, ELHADJ FOFANA, and other co-conspirators 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.

### **Relevant Individuals and Entities**

1. At various times relevant to this Criminal Complaint:
  - a. Defendant OLAGOKE ARAROMI was a resident of Bloomfield, Union, and Harrison, New Jersey.
  - b. Defendant ELHADJ FOFANA was resident of Bloomfield, Orange, and Harrison, New Jersey.
  - c. Moussa Dagno was a resident of Bloomfield, East Orange, and Harrison, New Jersey.
  - d. "USPS Employee 1, 2, 3, and 4" were employees of the United States Postal Service.
  - e. J.P. Morgan Chase Bank, N.A. ("Chase"), Bank of America, N.A. ("BOA"), and Capital One, N.A. ("Capital One") were "financial institutions" as that term is defined in Title 18, United States Code, Section 20, offering, among other products, credit cards to customers.
  - f. "Accountholder 1" was a customer of Chase who resided in East Orange, New Jersey.

### **Overview of the Conspiracy**

2. Following complaints received since in or about September 2017 by the United States Postal Service ("USPS") from various residents on certain postal routes in Essex and Union Counties that they did not receive credit cards in the mail that were sent by their banks and that the credit cards were used without their authorization, law enforcement commenced an investigation of the conduct of certain USPS letter carriers. The investigation revealed that from in or about July 2017 to in or about May 2018, USPS employees, including letter carriers, removed envelopes containing credit cards from the mail and gave them instead to defendant OLAGOKE ARAROMI and co-conspirator Moussa Dagno ("Dagno") in exchange for cash payments.

3. The investigation also revealed that from in or about July 2017 to in or about February 2018, defendants OLAGOKE ARAROMI and ELHADJ FOFANA, and others conspired to activate these stolen credit cards and use them to make unauthorized purchases at various retail stores in New Jersey and New York. The following sets forth various aspects of law enforcement's findings during the investigation.

**Bribery of USPS Employees to Obtain Stolen Credit Cards**

4. On or about June 1, 2018, USPS Employee 1 was interviewed by law enforcement officers and admitted having stolen certain mail in exchange for cash payments. Specifically, USPS Employee 1 admitted stealing envelopes that contained credit cards while delivering mail and accepting cash payments from defendant OLAGOKE ARAROMI, whom USPS Employee 1 knew only as "Dinero," in exchange for giving defendant OLAGOKE ARAROMI the stolen credit cards. According to USPS Employee 1, at various times between in or about the summer of 2017 and in or about May 2018, USPS Employee 1 stole envelopes containing credit cards from the mail for defendant OLAGOKE ARAROMI and defendant OLAGOKE ARAROMI received the stolen credit cards from USPS Employee 1 at various locations in New Jersey, including Bloomfield. Upon delivery, defendant OLAGOKE ARAROMI paid USPS Employee 1 in cash for the stolen credit cards.

5. Telephone records pertaining to USPS Employee 1's telephone number (the "Employee 1 Phone") showed that from in or about September 2017 to in or about February 2018, there were a total of over 550 telephone calls and text messages between the Employee 1 Phone and telephone numbers that defendant OLAGOKE ARAROMI used to communicate with the Employee 1 Phone and others relating to the stolen credit cards.

6. A review of a cellular telephone used by defendant OLAGOKE ARAROMI and Dagno ("ARAROMI/Dagno Phone") revealed text messages between USPS Employee 1 and defendant OLAGOKE ARAROMI concerning the scheme to steal credit cards from the mail. For example, defendant OLAGOKE ARAROMI (referred to as "ARAROMI" below) and USPS Employee 1 sent each other the following text messages:<sup>1</sup>

*From on or about September 23, 2017 to on or about September 24, 2017:*

ARAROMI:	Go hard today
USPS Employee 1:	Ight. I'm grab some. Yu said 100 a cc right?
ARAROMI:	Yessir
USPS Employee 1:	I gotvchu yu only want Chevy and boa, Nothing rElse [sic]?
ARAROMI:	Those are my favorite but if you come across something else I'll still get it but try your hardest for boa & chev
[. . .]	
USPS Employee 1:	Cause I only wanna get the 1's yu gonna pay for. . .
[. . .]	

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<sup>1</sup> All text messages appearing in this Complaint have been transcribed verbatim.

USPS Employee 1: I got 2 for you  
[. . .]  
ARAROMI: Go hard & ima cash you out heavy

*On or about February 6, 2018:*

USPS Employee 1: I got 2 if yu wanted  
[. . .]  
ARAROMI: Yeah I do want but can I grab tomorrow morning cuz ima  
be in Bloomfield  
ARAROMI: But for sure !!! I want them!!  
[. . .]  
ARAROMI: Btw what type are they  
USPS Employee 1: Amy and Chevy. I didn't even open the Chevy. I'll let yu  
ok before the night over

Based on the investigation to date, including records received from banks that mailed credit cards to residents in Bloomfield, "100 a cc" mentioned above refers to \$100 per stolen credit card, and "boa," "Chevy" or "chev," and "Amy" refer to the names of certain banks. For example, "Chevy" or "Chev" refers to Chase.

7. On or about February 23, 2018, USPS Employee 2 was interviewed by law enforcement officers and admitted having stolen certain mail on delivery routes in East Orange, New Jersey, in exchange for cash payments. Specifically, USPS Employee 2 admitted stealing envelopes that contained credit cards while delivering mail and accepting cash payments from defendant OLAGOKE ARAROMI, whom USPS Employee 2 knew only as "Dinero" and "Bandz," in exchange for giving defendant OLAGOKE ARAROMI the stolen credit cards. According to USPS Employee 2, from in or about July 2017 to in or about January 2018, USPS Employee 2 stole envelopes containing credit cards from the mail for defendant OLAGOKE ARAROMI and defendant OLAGOKE ARAROMI received the stolen mail containing the credit cards from USPS Employee 2. Upon delivery, defendant OLAGOKE ARAROMI paid USPS Employee 2 in cash for the stolen credit cards.

8. A review of the ARAROMI/Dagno Phone revealed that there were text messages between USPS Employee 2 and defendant OLAGOKE ARAROMI concerning the scheme to steal credit cards from the mail. For example, defendant OLAGOKE ARAROMI and USPS Employee 2 sent each other the following text messages:

*On or about July 8, 2017:*

ARAROMI: I'm telling u word to my moms ima have u rich within this first  
week u just gotta work with me and go hard  
ARAROMI: When we link today and u get what u get we gon have a talk and ima  
tell u how we bout to get rich scratch my back and I do the same I'll  
have u for life  
ARAROMI: All my other people that work they are living trust me I got you

ARAROMI: Just go hard today and when we link you gon see and ima tell u exactly how we bout to get rich really tho no baby money 5 digits in weeks 6 digits in a month

[...]

ARAROMI: Go hard today and we gon get rich quick trust me

ARAROMI: So ANYTHING that feel like it got a card inside of it

[...]

USPS Employee 2: Ok cool

[...]

ARAROMI: Plus I researched your area u work in everyone has good credit score so 95% of people order CC pieces so I'm sure u can get plenty shit salt

*On or about August 26, 2017:*

ARAROMI: How many you got?

ARAROMI: Just that one right?

USPS Employee 2: Yea one

ARAROMI: Bet If I jump in a cab home you could bring me back here? It's right around the corner I'll pay you. This cab shit in the way.

ARAROMI: I'm tryna come pick the shit up I need the address

ARAROMI: Can I come get the chevy or nah?

*On or about October 14, 2017:*

USPS Employee 2: I got two

ARAROMI: Chevy's?

USPS Employee 2: Nah the other one you fuck wit

As set forth above, based on the investigation to date, "Chevy" refers to the name of Chase.

9. The text messages between defendant OLAGOKE ARAROMI and USPS Employee 2 also showed that they arranged meetings at various locations in New Jersey, including in Essex and Hudson Counties, to make the cash for stolen credit card exchanges.

10. A review of telephone records from in or about July 2017 to in or about February 2018 of a cellular telephone number used by defendant OLAGOKE ARAROMI showed frequent telephone calls with cellular telephone numbers used by Dagno on or about dates on which defendant OLAGOKE ARAROMI communicated with USPS employees by telephone concerning the cash for stolen credit card scheme. During this time period, according to USPS employees, such as USPS Employee 3, Dagno provided cash to USPS employees to steal envelopes containing credit cards from the mail.

11. On or about January 5, 2018, USPS Employee 3 was interviewed by law enforcement officers and admitted stealing envelopes that contained credit cards from the mail and

giving the stolen credit cards to a then unidentified male in exchange for cash, whom the USPS Employee 3 did not know by name, but identified as “Money” within the USPS Employee 3’s cellular phone, and who law enforcement subsequently identified as Dagno. According to USPS Employee 3, Dagno met with USPS Employee 3 at various locations in Newark, New Jersey from in or about summer 2017 to in or about the beginning of January 2018 to pick up the stolen credit cards.

12. One of the three telephone numbers used by Dagno to communicate with USPS Employee 3 was the same telephone number that had been used from on or about October 26, 2017 to on or about November 25, 2017 to activate certain of the credit cards reported missing and used without the accountholder’s authorization by residents living on USPS Employee 3’s delivery route. This same telephone number was also used by defendant OLAGOKE ARAROMI, as shown by text messages between defendant OLAGOKE ARAROMI and USPS employees concerning the cash for stolen credit card scheme.

13. In addition, a review of the text messages found on the ARAROMI/Dagno Phone showed that, on or about September 3, 2017, the following exchange took place between the ARAROMI/Dagno Phone and a cellular telephone number used by USPS Employee 4. This employee was interviewed by law enforcement on or about October 17, 2018 and admitted to receiving cash in exchange for stealing credit cards from the mail for a then-unidentified man, whom law enforcement subsequently identified as Dagno:

USPS Employee 4: Wassup this the girl you do business with  
[. . .]

USPS Employee 4: I wanna know if you can give me 150 for the cards upfront cause I have somebody who’s offering me 200 a card but I’m fucking with you through my girl and I can’t keep paying her out the 100 you give me cause then that leave me with nothing and I’m the one getting them

Dagno: I’ll do that to satisfy the both of y’all... But tbh I never did that and I can’t afford more then that but I’ll do \$150  
[. . .]

Dagno: How many u have?

USPS Employee 4: I only have 1 cause I was working the window

Dagno: Ok bet [ . . . ] Ima he there 1:45 ish ok?

USPS Employee 4: Yea

14. On or about the February 23, 2018, during a search pursuant to a search warrant by law enforcement of an apartment in Harrison, New Jersey where defendants OLAGOKE ARAROMI, ELHADJ FOFANA, and Dagno, among others, were living at the time (the “Harrison Apartment”), law enforcement recovered a credit card insert letter from an envelope containing a credit card that had been removed from the mail by USPS Employee 4 for Dagno. The credit card insert letter was addressed to the same accountholder whose credit card was stolen and photographed by USPS Employee 4 on or about September 7, 2017 for a text message that USPS Employee 4 sent to Dagno.



### **The Unauthorized Use of the Stolen Credit Cards**

15. The investigation to date has shown that after defendant OLAGOKE ARAROMI and Dagno obtained stolen credit cards from USPS employees, defendant OLAGOKE ARAROMI, Dagno, and other co-conspirators, activated the stolen credit cards. For example, information provided by banks that issued the credit cards that were stolen showed that cellular phone numbers that defendant OLAGOKE ARAROMI used were used to activate stolen credit cards.

16. The investigation to date also has shown that after the stolen credit cards were activated, defendants OLAGOKE ARAROMI and ELHADJ FOFANA, Dagno, and other co-conspirators posed as the actual accountholders and used the stolen credit cards to make unauthorized purchases of retail goods, including, but not limited to, purchases of electronic devices. These electronic devices included Apple MacBook Pro devices that were found in the Harrison apartment that law enforcement searched on or about February 23, 2018. According to records from Best Buy and Apple stores, the serial numbers on the Apple MacBook Pro devices found in the Harrison apartment matched the serial numbers of Apple MacBook Pro devices products that were purchased at Best Buy stores in Vauxhall, Iselin, Manalapan, and Secaucus, New Jersey and Apple stores in Bridgewater and Short Hills, New Jersey, with credit cards that banks had mailed but the actual accountholders had not received and that were used without the authorization of the accountholders. Furthermore, available surveillance video recordings and photographs at a Best Buy store in Manalapan revealed that on or about February 20, 2018, defendant OLAGOKE ARAROMI used Accountholder 1's Chase credit card to purchase one of the MacBook Pro devices found in the Harrison Apartment.

17. In addition, surveillance video recordings and photographs from a Target store in Manalapan also showed that on or about February 20, 2018, defendants ELHADJ FOFANA and OLAGOKE ARAROMI together used and attempted to use Accountholder 1's Chase credit card to purchase items at the Target store. The surveillance video recordings and photographs from the Target store also showed that on this same date, defendant OLAGOKE ARAROMI made purchases with two Bank of America credit cards that had been mailed to accountholders living in East Orange but not received by the accountholders and used without their authorizations.

18. According to surveillance video recordings and/or photographs; records of purchases from retail stores; and records obtained from banks that mailed credit cards to accountholders living in Bloomfield and Hillside, defendants OLAGOKE ARAROMI, ELHADJ FOFANA, and co-conspirators made additional unauthorized purchases with stolen credit cards obtained from USPS employees. For example:

- a. On or about November 16, 2017, at a Target store in Vauxhall, defendant ELHADJ FOFANA used a Chase credit card mailed to an accountholder residing in Hillside that was not received by the accountholder and used without the accountholder's authorization, to purchase Apple products.

- b. Moreover, on or about January 20, 2018, at a Best Buy store in Paramus, defendant OLAGOKE ARAROMI purchased a gift card with a Chase credit card that was issued to an accountholder living in Bloomfield who reported that the credit card was used without the accountholder's authorization. The video surveillance records and photographs showed that defendant ELHADJ FOFANA was also at the same Best Buy store in Paramus around the same time at a different cash register purchasing an Apple MacBook Pro. The receipt obtained from Best Buy for the transaction showed that defendant ELHADJ FOFANA used a BOA credit card issued to another accountholder residing in Bloomfield who reported that the credit card was used without the accountholder's authorization.

19. According to information provided by Chase, BOA, and other banks, the fraudulent transactions made with the afore-mentioned stolen credit cards by defendants OLAGOKE ARAROMI, ELHADJ FOFANA, and the co-conspirators, resulted in financial losses to the banks.