

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Criminal No. 18-
 :
v. : Hon.
 :
FATOU DJAMBO : 18 U.S.C. §§ 2, 1028A(a)(1) & 1349

INFORMATION

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)

Individuals and Entities

1. At all times relevant to this Information:

- A. Defendant FATOU DJAMBO was a resident of Philadelphia, Pennsylvania;
- B. Co-conspirator Talat Ali Maan was a resident of Germantown, Maryland;
- C. Co-conspirator Syed Rehman was a resident of Jersey City, New Jersey;
- D. Co-conspirator Jaweed Wahed Ahmed was a resident of Jersey City, New Jersey;
- E. Bank 1 was a financial institution, as that term is defined in Title 18, United States Code, Section 20, that was headquartered in New York, New

York;

F. Bank 2 was a financial institution, as that term is defined in Title 18, United States Code, Section 20, that was headquartered in Winston-Salem, North Carolina;

G. Bank 3 was a financial institution, as that term is defined in Title 18, United States Code, Section 20, that was headquartered in Charlotte, North Carolina;

H. Bank 4 was a financial institution, as that term is defined in Title 18, United States Code, Section 20, that was headquartered in McLean, Virginia;

I. Bank 5 was a financial institution, as that term is defined in Title 18, United States Code, Section 20, that was headquartered in New York, New York;

J. Bank 6 was a financial institution, as that term is defined in Title 18, United States Code, Section 20, that was headquartered in New York, New York;

K. Bank 7 was a financial institution, as that term is defined in Title 18, United States Code, Section 20, that was headquartered in Columbus, Ohio;

L. Bank 8 was a financial institution, as that term is defined in Title 18, United States Code, Section 20, that was headquartered in Riverwoods,

Illinois;

M. Bank 9 was a financial institution, as that term is defined in Title 18, United States Code, Section 20, that was headquartered in Omaha, Nebraska;

N. Bank 10 was a financial institution, as that term is defined in Title 18, United States Code, Section 20, that was headquartered in Sioux Falls, South Dakota;

O. Bank 11 was a financial institution, as that term is defined in Title 18, United States Code, Section 20, that was headquartered in New York, New York;

P. Bank 12 was a financial institution, as that term is defined in Title 18, United States Code, Section 20, that was headquartered in Alexandria, Virginia;

Q. Bank 13 was a financial institution, as that term is defined in Title 18, United States Code, Section 20, that was headquartered in Pittsburgh, Pennsylvania;

R. Bank 14 was a financial institution, as that term is defined in Title 18, United States Code, Section 20, that was headquartered in Atlanta, Georgia;

S. Bank 15 was a financial institution, as that term is defined in Title 18, United States Code, Section 20, that was headquartered in Draper, Utah;

T. Bank 16 was a financial institution, as that term is defined in Title 18, United States Code, Section 20, that was headquartered in Cherry Hill, New Jersey;

U. Bank 17 was a financial institution, as that term is defined in Title 18, United States Code, Section 20, that was headquartered in Minneapolis, Minnesota;

V. Bank 18 was a financial institution, as that term is defined in Title 18, United States Code, Section 20, that was headquartered in San Francisco, California (Banks 1 through 18, collectively, the “Victim Financial Institutions”).

The Conspiracy

2. From at least as early as in or about 2014 to in or about May 2018, in Hudson County, in the District of New Jersey, and elsewhere, defendant

FATOU DJAMBO

did knowingly and intentionally conspire and agree with Talat Ali Maan, Syed Rehman, Jaweed Wahed Ahmed, and others, to execute a scheme and artifice to defraud financial institutions, as defined in Title 18, United States Code, Section 20, and to obtain money, funds, assets and other property owned by, and under the custody and control of, those financial institutions, 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. The object of the conspiracy was for FATOU DJAMBO and her co-conspirators (collectively, the “Co-Conspirators”) to engage in a scheme to use stolen and fraudulently altered identities to open bank, credit card, and merchant processing accounts with financial institutions, including the Victim Financial Institutions, and then use those accounts to make charges, purchases, and withdrawals that they had no intention of repaying.

Manner and Means of the Conspiracy

4. It was a part of the conspiracy that the Co-Conspirators stole the identities of actual people and then, in many cases, created synthetic identities by pairing the name and social security number for an actual person with a fictitious birth date. When creating the synthetic identities, the Co-Conspirators often used the name and social security number of an actual minor but altered the minor’s birth date to make the identity appear to be that of an adult.

5. It was further a part of the conspiracy that, for a period of time, defendant FATOU DJAMBO served as the middleman between her co-conspirators and another individual (“Individual 1”), who was in a position to fraudulently obtain Pennsylvania driver’s licenses. Through defendant DJAMBO, the Co-Conspirators obtained such licenses from Individual 1 to use as fictitious identification documents in connection with their scheme. Defendant DJAMBO received approximately \$800 from co-conspirators Maan and Rehman for each driver’s

license obtained in this fashion, approximately \$600 of which she paid to Individual 1 and approximately \$200 of which she retained for herself.

6. It was further a part of the conspiracy that the Co-Conspirators also obtained fraudulent identification documents through other means, including by manufacturing such documents themselves with an ID printer.

7. It was further a part of the conspiracy that the Co-Conspirators used the stolen and synthetic identities and fraudulent identification documents to obtain credit, primarily by opening credit card accounts at the Victim Financial Institutions (the "Fraud Cards"). The Fraud Cards were maintained in good standing with the Victim Financial Institutions long enough to establish the creditworthiness of the stolen and synthetic identities. The Co-Conspirators then "busted out" the Fraud Cards by making large purchases and never repaying the debts associated with those purchases.

8. It was further a part of the conspiracy that the Co-Conspirators incorporated and registered in various states numerous purported companies that did little or no legitimate business (the "Sham Companies"). The Co-Conspirators obtained credit card processing equipment by opening merchant processing accounts with the Victim Financial Institutions in the names of the Sham Companies. They then used that equipment to make fraudulent charges on the Fraud Cards.

9. It was further a part of the conspiracy that co-conspirator Rehman maintained a business called the "7 Even Food Mart" in Jersey City, New Jersey, which was a convenience store located at the same address as a gas station. From time to time, the Co-Conspirators used the 7 Even Food Mart to make fraudulent charges to the Fraud Cards. The Co-Conspirators also used the Fraud Cards to purchase merchandise from a Secaucus, New Jersey, warehouse store that they then sold for a profit at the 7 Even Food Mart.

10. It was further a part of the conspiracy that the Co-Conspirators used various addresses in New Jersey, New York, Pennsylvania, and Maryland as the purported mailing addresses for the Fraud Cards and the Sham Companies (the "Drop Addresses"). The Drop Addresses were controlled by the Co-Conspirators for the purpose of receiving mail sent in connection with the Fraud Cards and the Sham Companies, including mail containing fraudulently-obtained credit cards and credit card processing equipment.

11. It was further a part of the conspiracy that defendant FATOU DJAMBO supplied Drop Addresses in the Philadelphia area to her co-conspirators for use in this scheme. Defendant DJAMBO was paid \$500 per month by co-conspirators Maan and Rehman for (a) obtaining Philadelphia-area addresses that could be used as Drop Addresses; (b) periodically collecting the mail containing credit cards, bank statements, and other documents that was sent to those Drop Addresses; and (c) delivering that mail to co-conspirators Maan and Rehman, either

in person or through the U.S. Mail or other common carrier.

12. It was further a part of the conspiracy that co-conspirators Maan and Rehman maintained an apartment in Jersey City, New Jersey, containing the instrumentalities of their scheme. At the apartment, co-conspirators Maan and Rehman stored, among other items, hundreds of files containing names, addresses, and other identifiers associated with stolen and fraudulently-altered identities; voluminous records of transactions conducted using the accounts opened using these identities; information tracking whether certain accounts were open or closed at various points in time; passwords and security questions associated with the accounts; and dozens of cell phones, SIM cards, and voice over IP ("VOIP") equipment that the Co-Conspirators used to make contact with the Victim Financial Institutions.

13. It was further a part of the conspiracy that the Co-Conspirators did not repay the vast majority of the debt that they incurred through this scheme, leaving the Victim Financial Institutions to bear millions of dollars in losses.

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

COUNT TWO
(Aggravated Identity Theft)

1. The allegations set forth in Paragraphs 1 and 4 through 13 of Count One of this Information are hereby realleged and incorporated as if set forth in full herein.

2. Between in or about 2014 and in or about May 2018, in Jersey City, in Hudson County, in the District of New Jersey, and elsewhere, defendant

FATOU DJAMBO

did knowingly transfer, possess, and use, and did aid, abet, counsel, command, induce and procure the knowing transfer, possession, and use of, without lawful authority, the means of identification of other persons, including identity theft victims R.A. and H.P., during and in relation to a felony violation enumerated in 18 U.S.C. § 1028A(c), namely, the offense of conspiracy to commit bank fraud charged in Count One of this Information, knowing that these means of identification belonged to other actual persons.

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

FORFEITURE ALLEGATION

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

2. The United States hereby gives notice to the defendant charged in this Information that, upon conviction of the offense charged in Count One of the Information, the government will seek forfeiture, in accordance with Title 18, United States Code, Section 982(a)(2), of any and all property, real or personal, that constitutes or is derived from proceeds traceable to the violation of Title 18, United States Code, Section 1349 charged in Count One of the Information.

3. If by any act or omission of the defendant, any of the property subject to forfeiture described in paragraph 2 herein:

- 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 subdivided without difficulty,

the United States of America will be entitled to forfeiture of substitute property up to the value of the forfeitable property described above in paragraph 2, 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).


CRAIG CARPENITO
UNITED STATES ATTORNEY

CASE NUMBER: _____

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INFORMATION FOR

18 U.S.C. §§ 1028A(a)(1), 1349 & 2

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