

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

UNITED STATES OF AMERICA	:	Hon.
	:	
	:	Criminal No. 19-
v.	:	
	:	18 U.S.C. § 201(b)(2)(A) and (C)
	:	18 U.S.C. § 981(a)(1)(C)
KYANNE COSTLEY	:	28 U.S.C. § 2461

INFORMATION

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

1. At all times relevant to this Information:
 - a. Defendant KYANNE COSTLEY was employed by the United States Postal Service (“USPS”) as a mail carrier, and was a public official within the meaning of 18 U.S.C. § 201(a)(1).
 - b. Defendant KYANNE COSTLEY was employed at the post office station in Elizabeth, New Jersey.
2. From in or about September 2017 to in or about February 2018, defendant KYANNE COSTLEY received cash payments from Moussa Dagno (“Dagno”) in exchange for stealing credit cards from the mail that were sent by financial institutions to accountholders and for giving those stolen credit cards to Dagno.
3. It was part of the scheme that, from in or about September 2017 to in or about February 2018:

a. defendant KYANNE COSTLEY looked for certain types of return addresses on envelopes she came across while delivering mail, as instructed by Dagno, to find envelopes that likely contained credit cards;

b. defendant KYANNE COSTLEY met on multiple occasions with Dagno, in New Jersey, including in Bloomfield and Newark, to give the stolen credit cards that she removed from the mail to Dagno; and

c. defendant KYANNE COSTLEY often received approximately \$100 in cash from Dagno for each stolen credit card that she provided to him.

4. From in or about September 2017 to in or about February 2018, in Essex County, in the District of New Jersey, and elsewhere, defendant

KYANNE COSTLEY,

being a public official, directly and indirectly, did corruptly demand, seek, receive, accept, and agree to receive and accept things of value, namely, cash, in return for being influenced in the performance of official acts and for being induced to do, and omit to do, acts in violation of her official duties.

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

FORFEITURE ALLEGATION

1. The allegations contained in all paragraphs of this Information are hereby realleged and incorporated by reference for the purpose of noticing forfeiture pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

2. The United States hereby gives notice to defendant KYANNE COSTLEY that, upon conviction of the bribery offense in violation of Title 18, United States Code, Section 201(b)(2)(A) and (C), charged in this Information, the United States will seek forfeiture, in accordance with Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), of any and all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of such offense, including, but not limited to, \$1,750 in United States currency.

3. If by any act or omission of the defendant KYANNE COSTLEY, any of the property subject to forfeiture described above:

- 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 KYANNE COSTLEY up to the value of the above-described forfeitable property.

Craig Carpenito
CRAIG CARPENITO
United States Attorney

CASE NUMBER: 19-_____

**United States District Court
District of New Jersey**

UNITED STATES OF AMERICA

v.

KYANNE COSTLEY

INFORMATION FOR

18 U.S.C. § 201(b)(2)(A) and (C)
18 U.S.C. § 981(a)(1)(C)
28 U.S.C. § 2461(c)

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