

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

UNITED STATES OF AMERICA	:	Hon.
	:	
	:	Criminal No. 19-
v.	:	
	:	18 U.S.C. § 201(b)(1)(A) and (C);
	:	18 U.S.C. § 1344; 18 U.S.C. § 1028A(a)(1);
MOUSSA DAGNO	:	18 U.S.C. § 2; 18 U.S.C. § 981(a)(1)(C) &
	:	§ 982(a)(2)(A); 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:

Count 1

(Bribery)

1. At all times relevant to Count 1 of this Information:
 - a. Defendant MOUSSA DAGNO was a resident of Belleville, New Jersey and Harrison, New Jersey.
 - b. Zenobia Gilmer was employed as a mail carrier for the United States Postal Service (“USPS”) in Mount Arlington, New Jersey.
 - c. Kyanne Costley was employed as a mail carrier for the USPS in Elizabeth, Hillside, Roselle, and Roselle Park, New Jersey.
 - d. Jennel Williams was employed by the USPS as a mail clerk at the Newark Main Post Office. Williams, Gilmer and Costley all were public officials within the meaning of 18 U.S.C. § 201(a)(1).
 - e. “Victim Financial Institution 1,” Victim Financial Institution 2,”

“Victim Financial Institution 3,” and “Victim Financial Institution 4,” (collectively the “Victim Financial Institutions”) all were “financial institutions,” as that term is defined in Title 18, United States Code, Section 20, offering, among other things, credit cards to customers. The Victim Financial Institutions sent credit cards to accountholders in New Jersey through the United States mail.

2. From in or about June 2017 to in or about February 2018, in Essex, Morris and Union Counties, in the District of New Jersey, and elsewhere, defendant

MOUSSA DAGNO

did, directly and indirectly, corruptly give, offer, and promise things of value, namely, United States currency, to USPS employees, including Zenobia Gilmer, Kyanne Costley, Jennel Williams, and others, with intent to influence official acts and to induce such employees to do and omit to do acts in violation of the lawful duties of such employees.

3. It was part of the scheme that defendant MOUSSA DAGNO offered to pay and paid cash bribes (typically \$100 per card) to USPS employees in New Jersey, including Gilmer, Costley and Williams, to induce them to steal access devices, namely, credit cards, ATM cards, and/or debit cards (the “cards”) sent through the United States mail, many of which had been issued by the Victim Financial Institutions, and deliver the stolen cards to defendant MOUSSA DAGNO and others at various locations in New Jersey.

4. It was further a part of the scheme that defendant MOUSSA DAGNO and others, upon receiving the stolen cards from the USPS employees, posed as the actual accountholders to whom the Victim Financial Institutions had attempted to mail the cards when calling the Victim Financial Institutions to activate the cards with the intent to fraudulently use the cards.

5. It was further a part of the scheme that defendant MOUSSA DAGNO and others used the stolen cards provided by the USPS employees to purchase electronics, including Apple MacBook Pro devices and iPhones, luxury-brand clothing, and other items at retail stores in Essex, Hudson, Middlesex, and Somerset Counties, and kept some of these items at an apartment that MOUSSA DAGNO and others shared in Harrison.

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

Count 2

(Bank Fraud)

1. The allegations set forth in paragraph 1 and paragraphs 3 to 5 of Count 1 of this Information are realleged and incorporated as though fully set forth herein.

2. From in or about June 2017 to in or about February 2018, in Essex, Morris, Hudson, Middlesex and Somerset Counties, in the District of New Jersey, and elsewhere, defendant

MOUSSA DAGNO

knowingly and intentionally executed and attempted to execute a scheme and artifice to defraud financial institutions whose deposits were insured by the Federal Deposit Insurance Corporation, and to obtain moneys, funds, credits, 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.

In violation of Title 18, United States Code, Section 1344 and Section 2.

Count 3

(Aggravated Identity Theft)

1. The allegations set forth in paragraph 1 and paragraphs 3 to 5 of Count 1 of this Information are realleged and incorporated as though fully set forth herein.

2. At all times relevant to Count 3 of this Information, Victim Cardholder 1 was a resident of Mt. Arlington, New Jersey.

3. On or about October 24, 2017, in Middlesex County, in the District of New Jersey, and elsewhere, defendant

MOUSSA DAGNO

did knowingly transfer, possess, and use, without lawful authority, a means of identification of another individual, namely a credit card of Victim Cardholder 1 issued by Victim Financial Institution 1, during and in relation to a felony violation of a provision contained in Chapter 63 of the United States Code, that is, bank fraud, contrary to Title 18, United States Code, Section 1344, as charged in Count 2 of this Information.

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

FORFEITURE ALLEGATIONS

ALLEGATION 1

1. Upon conviction of the bribery offense in violation of 18 U.S.C. § 201(b)(1)(A) and (C), as charged in Count 1 of this Information, defendant MOUSSA DAGNO 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, that constitutes or is derived from proceeds traceable to the commission of the said bribery offense, the value of which totals \$84,573.40, and which includes, but is not limited to, all right, title, and interest of defendant MOUSSA DAGNO in the following:

- (a) MacBook Pro - Serial No. C02V9495HV22;
- (b) MacBook Pro - Serial No. C02W25A8HV2L;
- (c) MacBook Pro - Serial No. FVFVX7JUHV22;
- (d) MacBook Pro - Serial No. C02VR3HLHV22;
- (e) MacBook Pro - Serial No. C02VM2ACHV2L;
- (f) MacBook Pro - Serial No. C02VWA7RHV2L; and
- (g) iPhone - Model A1661/FCC ID BCG-E3087A IC 579C-E3087A.

ALLEGATION 2

2. Upon conviction of the bank fraud offense in violation of 18 U.S.C. § 1344, as charged in Count 2 of this Information, defendant MOUSSA DAGNO shall forfeit to the United States, pursuant to 18 U.S.C. § 982(a)(2)(A), all property that constitutes or is derived from proceeds defendant MOUSSA DAGNO obtained directly or indirectly as a result of such offense, the value of which totals \$84,573.40, and which includes, but not is not limited to, all right, title, and interest of defendant MOUSSA DAGNO in the property described in paragraphs 1(a) to 1(g) above.

Substitute Assets Provision
(Applicable to All Forfeiture Allegations)

3. If by any act or omission of the defendant MOUSSA DAGNO, 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 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. § 981(a)(1)(C), 28 U.S.C. § 2461(c), and 18 U.S.C. § 982(b), to seek forfeiture of any other property of defendant MOUSSA DAGNO up to the value of the above-described forfeitable property.



CRAIG CARPENITO
United States Attorney

CASE NUMBER: 19-_____

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UNITED STATES OF AMERICA

v.

MOUSSA DAGNO

INFORMATION FOR

18 U.S.C. § 201(b)(1)(A) and (C);
18 U.S.C. § 1344; 18 U.S.C. § 1028(A)(1);
18 U.S.C. § 981(a)(1)(C) & 982(a)(2)(A);
28 U.S.C. § 2461(c)

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