UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon.

:

Criminal No. 19-

18 U.S.C. § 371

:

JAQUAN MILLER :

v.

INFORMATION

The defendant having waived in open court prosecution by indictment, the United States

Attorney for the District of New Jersey charges:

- 1. At times material to this Information:
- a. Defendant JAQUAN MILLER ("MILLER") was employed by the United States Postal Service ("USPS") as a mail carrier and technician at the Hudson City Station Post Office in Jersey City, New Jersey, and was assigned to postal delivery routes in Jersey City.
- b. Olagoke Araromi ("Araromi") was a resident of Bloomfield, Union, and Harrison, New Jersey.
- c. Moussa Dagno ("Dagno") was a resident of Bloomfield, East Orange, and Harrison, New Jersey.

The Conspiracy

From in or about the summer of 2017 to in or about August 2018, in Hudson
 County, in the District of New Jersey and elsewhere, defendant

JAQUAN MILLER

being a USPS officer or employee, knowingly and intentionally did conspire and agree with Araromi, Dagno, and others, to embezzle, steal, abstract, and remove from mail, articles and things contained therein, namely, credit cards sent by financial institutions, entrusted to him and which came into his possession intended to be conveyed by mail, and carried and delivered by any carrier, messenger, agent, and other person employed in any department of the USPS, contrary to Title 18, United States Code, Section 1709.

Object of the Conspiracy

3. It was the object of the conspiracy for MILLER and other USPS employees to steal credit cards issued by financial institutions from the mail and deliver the stolen credit cards to Araromi, Dagno, and others, who used the stolen credit cards to make unauthorized purchases at various retail stores in New Jersey and New York.

Means and Methods

- 4. It was part of the conspiracy that:
- a. Araromi and Dagno arranged for USPS employees in New Jersey, including MILLER, to steal envelopes containing credit cards from the United States mail and to deliver those credit cards to Araromi and Dagno in exchange for payment from Araromi and Dagno.
- b. MILLER and other USPS employees removed envelopes containing credit cards from the mail, including from postal delivery routes in Jersey City.

c. MILLER and other USPS employees met with Araromi, Dagno, and others at locations in New Jersey to deliver credit cards that had been intercepted and stolen from the

mail.

d. Araromi, Dagno, and others, knowing that they were not the actual

accountholders of the stolen credit cards, used the stolen credit cards at retail stores, including

stores in New Jersey and New York, in order to purchase electronics and other items.

Overt Acts

5. In furtherance of the conspiracy and to effect its unlawful object, the following

overt acts, among others, were committed in the District of New Jersey:

a. On or about June 26, 2017, MILLER met with Araromi at or around a

building on Montrose Avenue in Jersey City, which was on MILLER's assigned postal delivery

route, to deliver credit cards to Araromi that defendant MILLER had stolen from the mail.

b. On or about September 9, 2017, MILLER sent a text message to a cellular

telephone used by Araromi and Dagno indicating, "I got 5 for you," notifying them that he had

stolen credit cards, and proposed meeting at or around a building on Summit Avenue in Jersey

City, which was on MILLER's assigned postal delivery route.

c. In or about July 2018, while working as a USPS employee, MILLER

removed envelopes containing credit cards from the mail, which were later activated and used

without the authorization of the accountholders.

In violation of Title 18, United States Code, Section 371.

CRAIC CARPENITO

United States Attorney

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CRAIG CARPENITO

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