

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon. James B. Clark, III
: :
v. : Mag. No. 20-12402
: :
CREED WHITE a/k/a : **CRIMINAL COMPLAINT**
"Dan Stein" : :


I, Sarah Gordon-Howell, 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 Special Agent for the Federal Bureau of Investigation, and that this complaint is based on the following facts:

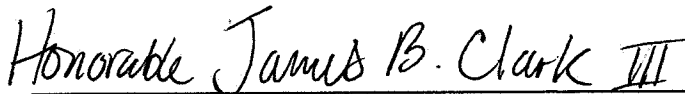
SEE ATTACHMENT B

Continued on the attached page and made a part hereof:



Sarah Gordon-Howell
Special Agent
Federal Bureau of Investigation

Special Agent Sarah Gordon-Howell attested to this Affidavit by telephone pursuant to F.R.C.P. 4.1(B)(2)(A) on this 20th day of October, 2020.



HONORABLE JAMES B. CLARK, III
UNITED STATES MAGISTRATE JUDGE

Signed by SA Gordon-Howell at Judge Clark direction pursuant to F.R.C.P. 4.1(b)(6)(C).

ATTACHMENT A

**Counts One through Four
(Wire Fraud)**

From at least as early as January 1, 2017 through on or about January 3, 2018, in the District of New Jersey, and elsewhere, defendant

**CREED WHITE a/k/a
"Dan Stein"**

knowingly and intentionally devised a scheme and artifice to defraud the Victim, and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, and for the purpose of executing such scheme and artifice to defraud, transmitted and caused to be transmitted by means of wire communications in interstate and foreign commerce the signals and sounds described below for each count, each transmission constituting a separate count:

<u>Count</u>	<u>Approximate Date</u>	<u>Description</u>
One	1/17/2017	\$40,451.84 wire transfer from Company A's account at cbb Bank to American Scrap, LLC's account at First Capital Federal Credit Union
Two	2/1/2017	\$47,349.43 wire transfer from Company A's account at cbb Bank to American Scrap, LLC's account at First National Bank
Three	2/6/2017	\$71,314.56 wire transfer from Company A's account at cbb Bank to American Scrap, LLC's account at First National Bank
Four	2/10/2017	\$93,075.84 wire transfer from Company A's account at cbb Bank to American Scrap, LLC's account at First National Bank

All in violation of Title 18, United States Code, Section 1343.

ATTACHMENT B

I, Sarah Gordon-Howell, am a Special Agent with the Federal Bureau of Investigation. I have knowledge about the facts set forth below from my involvement in the investigation, my review of reports, documents, pictures, videos, witness interviews, and discussions with other law enforcement officials. Because this affidavit is submitted for the limited purpose of establishing probable cause, I have not set forth each and every fact that I know concerning this investigation. All statements described herein are relayed in substance and in part. In addition, where I assert that an event took place on a particular date, I am asserting that it took place on or about the date alleged.

1. At all times relevant to this Complaint:
 - a. Defendant CREED WHITE a/k/a "Dan Stein" ("WHITE") was a resident of Freeland, Maryland.
 - b. American Scrap, LLC was a scrap metal business with a listed business address in Camden, New Jersey.
 - c. WHITE owned and operated American Scrap, LLC and controlled the bank accounts belonging to American Scrap, LLC at First Capital Federal Credit Union and First National Bank.
 - d. The "Victim" was the owner and operator of a metal-alloy company located in Garden Grove, California ("Company A"). Company A was in the business of shipping scrap metal from the United States and Canada to international destinations, including Korea.
 - e. The Federal Reserve Bank processed and settled, through the Fedwire system, the wire transfers specified in Counts One through Four of this Complaint. The Fedwire system used servers in New Jersey, among other places, to settle the wires.

The Scheme to Defraud

2. In or about late 2016, the Victim posted an inquiry on a scrap metal exchange website relating to his interest in purchasing a container of aluminum scrap metal. In or about January 2017, an individual identifying himself as "Dan Stein" (later identified as WHITE) called the Victim on the phone with an offer to sell the Victim aluminum scrap metal.

3. During January and February of 2017, the Victim, through Company A, purchased twenty-five containers of aluminum scrap metal from American Scrap, LLC through WHITE.¹

4. The Victim paid for the containers by wiring money into two accounts belonging to American Scrap, LLC. Between on or about January 11 and March 2, 2017, the Victim made twenty wire payments totaling approximately \$629,972.95—including the wires specified in Counts One through Four of this Complaint.

5. On or about March 6, 2017, the first container the Victim ordered from American Scrap arrived in Korea. An inspection of the container revealed that it contained dirt and debris and no aluminum scrap metal.

6. Upon learning that the contents of the container were useless debris and not aluminum, the Victim reached out to WHITE. On or about March 11, 2017, the Victim met with WHITE in Newark, New Jersey. WHITE assured the Victim that he would correct the mistake and reimburse the Victim for the cost of the materials, as well as costs such as those associated with freight, disposal, custom clearance, and trucking in Korea. At the meeting, the Victim and WHITE posed together for a photograph.

7. To address the problem, WHITE sent the Victim photos of the contents of another container, which WHITE was purportedly shipping on or about February 6, 2017. The photos showed that the container was filled with aluminum scrap. There was a copy of the New York Post inside the container to document the date the photos were taken.

8. The Victim engaged the services of an inspection company in Korea to inspect the container when it arrived in Korea on or about March 28, 2017. The report from the inspection company shows that once the inspectors broke the seal on the container door, they found eighteen plastic storage vessels inside filled with bricks and other debris. Photographs taken by the inspectors show that the container contained no aluminum.

9. Each of the remaining containers arrived in Korea and was found to contain dirt, debris and/or plastic waste and no aluminum. The last container arrived in Korea on or about April 17, 2017.

¹ Although referred to as WHITE below, WHITE held himself out to the Victim as “Dan Stein” throughout the scheme to defraud.

10. Between May 4, 2017 and May 10, 2017, the Victim received four checks, written from the account of American Scrap, LLC, made out to Company A, for a total of \$900,000. The checks were signed "Dan Stein." WHITE asked the Victim to hold off on cashing the checks, claiming that there were insufficient funds in American Scrap, LLC's bank account to cover the checks.

11. Between May 17, 2018 and June 22, 2018, the Victim received twelve wire payments of \$1,000 each in Company A's account at cbb Bank. These wires came from a bank account belonging to another scrap metal business in Freeland, Maryland (the "Freeland Scrap Metal Company"). On or about June 29, 2018, Company A received an additional \$3,000 in its account at cbb Bank. In total, Company A received \$15,000 in wire transfers, purportedly on behalf of American Scrap, LLC. Each transfer noted that it was for "scrap payment."

12. The investigation has revealed that "Dan Stein" is simply an alias for WHITE. For example, (1) WHITE was the sole signatory on American Scrap, LLC's bank account at First National Bank; (2) WHITE was the registered owner of a vehicle that the Victim saw "Dan Stein" driving; and (3) Freeland Scrap Metal Company is registered to WHITE. In addition, law enforcement examined the photograph taken of the Victim and "Dan Stein" in March 2017 and compared it to known photographs of WHITE, and they depict the same individual.