

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

UNITED STATES OF AMERICA : Hon. Leda Dunn Wettre
 : :
 : Mag. No. 21-13255 (LDW)
 : :
KHAORI MONROE : **CRIMINAL COMPLAINT**

I, Bladimir Daza, 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 with the U.S. Department of Labor, Office of Inspector General, and that this complaint is based on the following facts:

SEE ATTACHMENT B

continued on the attached page and made a part hereof.

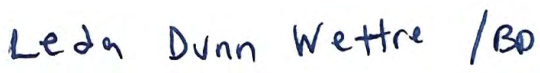


Special Agent Bladimir Daza
U.S. Department of Labor
Office of Inspector General

*Special Agent Daza attested to this Complaint by telephone pursuant to FRCP 4.1(b)(2)(A).

Sworn to and subscribed via telephone, NEW JERSEY
this 30th day of August, 2021 State

HONORABLE LEDA DUNN WETTRE
UNITED STATES MAGISTRATE JUDGE



Signature of Judicial Officer

ATTACHMENT A

(Wire Fraud)

From in or around July 2020 through in or around October 2020, in Essex County, in the District of New Jersey and elsewhere, defendant

KHAORI MONROE

knowingly and intentionally devised and intended to devise a scheme and artifice to defraud the State of California and others, and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, and, for the purpose of executing and attempting to execute such scheme and artifice to defraud, did transmit and cause to be transmitted by means of wire communications in interstate and foreign commerce, certain writings, signs, signals, pictures, and sounds, to wit, a wire transmission sent on or about August 18, 2020, from a location inside of New Jersey to a location outside.

In violation of Title 18, United States Code, Sections 1343 and 2.

ATTACHMENT B

I, Bladimir Daza, a Special Agent with the U.S. Department of Labor, Office of Inspector General (“DOL-OIG”), having personally participated in an investigation of the conduct of defendant KHAORI MONROE (“MONROE”), and having spoken with other law enforcement officers and individuals and reviewed documents, have knowledge of the following facts. Because this Complaint is submitted for the limited purpose of establishing probable cause, I have not included all facts known to me concerning this investigation. The contents of documents and the actions, statements, and conversations of individuals referenced below are provided in substance and in part, unless otherwise indicated.

1. At all times relevant to this Complaint, MONROE was employed as a letter carrier at a USPS location in Newark, New Jersey.

2. On March 27, 2020, the Coronavirus Aid, Relief, and Economic Security Act “CARES Act” was signed into law. The CARES Act created a new temporary federal unemployment insurance program called Pandemic Unemployment Assistance (“PUA”). PUA provides unemployment insurance benefits (“UIBs”) for individuals who are not eligible for other types of unemployment (e.g., self-employed, independent contractors, gig economy workers). The CARES Act also created a new temporary federal program called Federal Pandemic Unemployment Assistance that provides an additional \$600 weekly benefit to those eligible for PUA and regular UIBs. Unemployment Insurance (“UI”) is a state-federal program that provides unemployment insurance benefits (“UIBs”) to eligible workers.

3. On or about July 13, 2021, an application was made for UIBs in the name of Individual 1 to the State of California. In response, the State of California caused a debit card with a number ending in 0880 (the “0880 Card”) to be issued and sent by United States mail to a residence in New Jersey (the “Residence”). The State of California caused the 0880 Card to be funded with approximately \$18,000. The investigation has determined that the application was fraudulent and that Individual 1 did not make the above-referenced application.

4. Between on or about August 4, 2020, and September 10, 2020, approximately \$18,000 was debited from the 0880 Card.

5. A telephone number ending in 8646 (the “Telephone Number”) was used to call an issuing bank concerning two other debit cards that the investigation has determined were issued in response to fraudulent applications. Records obtained during the investigation demonstrate that the Telephone Number was subscribed to by defendant MONROE during this time. Records obtained during the investigation further reveal that: (a) the two debit

cards were funded with a combined total of approximately \$31,000; and (b) approximately \$6,000 in total was withdrawn in combination from the two debit cards.

6. On or about April 7, 2021, defendant MONROE was interviewed by law enforcement officers (the "April 7, 2021 Interview"). During the April 7, 2021 Interview, MONROE identified himself in three photographs. The photographs each depict an individual making a transaction at an ATM in New Jersey. Bank records reveal that in or around the time of the photographs, withdrawals were made from the ATMs using the 0880 Card. The investigation has revealed that these ATM withdrawals, which occurred on or about August 18, 2020, and August 21, 2020, each caused a wire communication from a location inside of New Jersey to a location outside of New Jersey.

7. Defendant MONROE stated during the April 7, 2021 Interview, in substance and in part, that he took 0880 Card from a second and separate USPS location in Newark, New Jersey.