
UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Mag. No. 17-1525 (DEA)
 :
 v. : Hon. Douglas E. Arpert
 :
 DANIEL WHITE : **CRIMINAL COMPLAINT**


I, Timothy Jordan, 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 United States Secret Service and that this complaint is based on the following facts:

SEE ATTACHMENT B

continued on the attached pages and made a part hereof.



Timothy Jordan, Special Agent
United States Secret Service

Sworn to before me and subscribed in my presence,
August 3, 2017 at Trenton, New Jersey



HONORABLE DOUGLAS E. ARPERT
UNITED STATES MAGISTRATE JUDGE

ATTACHMENT A

COUNT 1

(Bank Fraud)

From in or about February 2015 to in or about June 2016, in the District of New Jersey, and elsewhere, defendant

DANIEL WHITE

did knowingly execute and attempt to execute a scheme and artifice with intent to defraud a financial institution, namely, TD Bank, and to obtain money, funds and assets, owned by and under the custody and control thereof, 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 2

(Aggravated Identity Theft)

On or about February 22, 2016, in the District of New Jersey, and elsewhere, defendant

DANIEL WHITE

knowingly transferred, possessed, and used, without lawful authority, the means of identification of other persons, namely the social security numbers of Victim 1 and Victim 2, during and in relation to violations of federal law, namely bank fraud (18 U.S.C. § 1344).

In violation of Title 18, United States Code, Section 1028A and Section 2.

ATTACHMENT B

I, Timothy Jordan, have been a Special Agent with the United States Secret Service (“USSS”) for approximately 20 years, and I have been personally involved in the investigation of this matter. The information contained in this Complaint is based upon my personal knowledge, as well as information obtained from other sources, including: (a) statements made or reported by various witnesses with knowledge of relevant facts; (b) documents obtained from various sources; and (c) discussions with other law enforcement officials. Because this Complaint is being submitted for the limited purpose of establishing probable cause, it does not include every fact that I have learned during the course of the investigation. Where the content of documents and the actions, statements, and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated. The events described below occurred on or about the dates provided, and the dollar figures are approximate.

1. At all times relevant to this Complaint:
 - a. DANIEL WHITE (“WHITE”) resided in Manalapan, New Jersey.
 - b. TD Bank was a financial institution, as defined in Title 18, United States Code, Section 20, whose deposits were insured by the Federal Deposit Insurance Corporation, with bank branches throughout New Jersey and elsewhere.
2. Beginning in or about February 2015 through in or about June 2016, defendant WHITE and others engaged in a check-kiting scheme involving numerous accounts at TD Bank.
3. To carry out the scheme, WHITE opened or directed others to open numerous accounts at TD Bank (the “White Accounts”), frequently using social security numbers belonging to other individuals. WHITE then wrote or caused others to write numerous checks addressed to himself or the owners of the White Accounts, knowing that the accounts against which the checks were written did not contain sufficient funds to cover those checks (the “Insufficient Funds Checks”). WHITE and others acting at his direction then deposited the Insufficient Funds Checks into the White Accounts and withdrew money from those accounts before such checks bounced.
4. For example, on or about February 22, 2016, WHITE opened the following four accounts at the TD Bank branch in Freehold, New Jersey, using his own name and New Jersey driver’s license, but a social security number belonging to Victim 1:
 - a. Checking account ending in 5201 (“Account 1”). On February 22, 2016, WHITE deposited into Account 1 check number 443 for \$980 drawn on an account held by R.S. On February 23, 2016, two additional deposits of \$860 and \$100 were made into Account 1 via phone transfers. Between February 22, 2016 and February 24, 2016, approximately \$1214 was withdrawn from Account 1,

including, amongst other transactions, three ATM withdrawals: \$143 in Englishtown, New Jersey; \$543 in Feasterville, Pennsylvania; and \$203 in Feasterville, Pennsylvania. On February 24, 2016, check number 443 from R.S. was returned due to insufficient funds, resulting in a loss to TD Bank of approximately \$254 in connection with Account 1.

- b. Savings account ending in 5528 ("Account 2"). On February 22, 2016, WHITE deposited into Account 2 check number 370 for \$960 drawn on an account held by R.S. Between February 22, 2016 and February 24, 2016, approximately \$960 was withdrawn from Account 2, including a \$860 cash withdrawal from a bank teller. On February 24, 2016, check 370 was returned due to insufficient funds, resulting in a loss to TD Bank of approximately \$960 in connection with Account 2.
- c. Checking account ending in 5194 ("Account 3"). On February 22, 2016, WHITE deposited into Account 3 check number 6142 for \$980 drawn on an account held by R.O. The same day, two deposits of \$100 each were made into Account 3 via online "eTransfers." Between February 22, 2016 and February 23, 2016, approximately \$889 was withdrawn from Account 3, including two ATM cash withdrawals: \$343 in Englishtown, New Jersey and \$543 in Feasterville, Pennsylvania. On February 24, 2016, check 6142 from R.O. was returned due to insufficient funds, resulting in a loss to TD Bank of approximately \$689 in connection with Account 3.
- d. Savings account ending in 5792 ("Account 4"). On February 22, 2016, WHITE deposited into Account 4 check number 369 for \$960 drawn on an account held by R.S. Between February 22, 2016 and February 24, 2016, approximately \$200 was withdrawn from Account 4. On February 24, 2016, check number 369 from R.S. was returned due to insufficient funds, resulting in a loss to TD Bank of approximately \$200 in connection with Account 4.

5. In addition, on or about February 22, 2016, WHITE opened the following two accounts at the TD Bank branch in South Freehold, New Jersey, using his own name and New Jersey driver's license, but a social security number belonging to Victim 2:

- a. Checking account ending in 4980 ("Account 5"). On February 22, 2016, WHITE deposited approximately \$1,010 into Account 5, consisting of \$30 in cash and check number 329 for \$980 drawn on an account held by R.S. Between February 22, 2016 and February 24, 2016, approximately \$714 was withdrawn from Account 5, including, amongst other transactions, two ATM withdrawals: \$143 in Howell New Jersey, and \$543 in Feasterville, Pennsylvania. On February 24, 2016, check number 329 from R.S. was returned due to insufficient funds, resulting in a loss to TD Bank of approximately \$684 in connection with Account 5.

b. Savings account ending in 0351 ("Account 6"). On February 22, 2016, WHITE deposited approximately \$980 into Account 6, consisting of \$20 in cash and check number 333 for \$960 drawn on an account held by R.S. The deposit of check number 333 was conducted by WHITE at the TD Bank branch in Howell, New Jersey, and captured in a surveillance photo. The same day, \$921 was transferred into Account 6 via an online "eTransfer" and \$120 was transferred out. On February 24, 2016, approximately \$1,780 was withdrawn from Account 6 in two separate cash withdrawals from bank tellers. On February 24, 2016, check number 333 from R.S. was returned due to insufficient funds, resulting in a loss to TD Bank of approximately \$959 in connection with Account 6.

6. Throughout the 16-month scheme, WHITE opened or directed others to open approximately 413 accounts at TD Bank using approximately 133 different social security numbers. Approximately 84 of those social security numbers belonged to other unwitting individuals and two were not on file with the Social Security Administration. WHITE himself opened approximately 115 of the TD Bank accounts, using approximately 31 different social security numbers, of which approximately 30 belonged to other unwitting individuals. During the scheme, approximately 472 Insufficient Funds Checks totaling approximately \$530,559 were deposited into the White Accounts.