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

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UNITED STATES OF AMERICA : Hon. André M. Espinosa, U.S.M.J.  
 :  
 v. : Mag. No. 21-11167 (AME)  
 :  
 JAHAD SALTER : **CRIMINAL COMPLAINT**  
 :  
 :

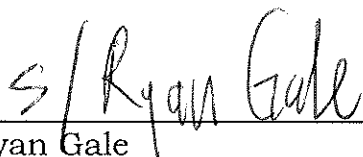
I, Ryan Gale, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

**SEE ATTACHMENT A**

I further state that I am a Postal Inspector with the United States Postal Inspection Service, and that this complaint is based on the following facts:

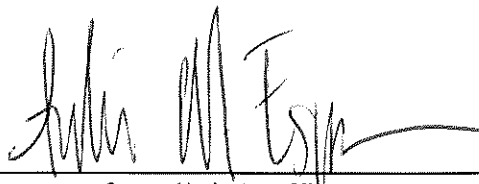
**SEE ATTACHMENT B**

Continued on the attached page and made a part hereof:

  
\_\_\_\_\_  
Ryan Gale  
Postal Inspector  
U.S. Postal Inspection Service

Attested to by telephone pursuant to  
Fed. R. Crim. P. 4.1 on July 29, 2021  
in the District of New Jersey

HONORABLE ANDRÉ M. ESPINOSA  
UNITED STATES MAGISTRATE JUDGE

  
\_\_\_\_\_  
Signature of Judicial Officer

**ATTACHMENT A**

**COUNT 1**

**(Conspiracy to Commit Access Device Fraud)**

Between at least in or about August 2019 and at least on or about March 30, 2021, in Hudson County, in the District of New Jersey and elsewhere, defendant

JAHAD SALTER

did conspire with others to knowingly and with intent to defraud traffic in and use one or more unauthorized access devices, namely, credit cards, during a one-year period, and by such conduct obtained things of value aggregating \$1,000 and more during that period, in a manner affecting interstate commerce, contrary Title 18, United States Code, Section 1029(a)(2).

In violation of Title 18, United States Code, Sections 1029(b)(2) and (c)(1)(A)(i).

**COUNT 2**

**(Conspiracy to Commit Mail Theft)**

Between at least on or about February 4, 2021 and at least on or about March 30, 2021, in Hudson County, in the District of New Jersey and elsewhere, defendant

JAHAD SALTER

did knowingly and intentionally conspire and agree with others to commit an offense against the United States and one or more persons acted to effect the object of the conspiracy, namely steal, take, and abstract from out of any mail, post office, and station thereof, letters and mails, and abstract and remove from such letters and mails, articles and things contained therein, contrary to Title 18, United States Code, Section 1708 and Section 2.

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

**ATTACHMENT B**

I, Ryan Gale, a Postal Inspector with the United States Postal Inspection Service ("USPIS"), having personally participated in an investigation of the conduct of defendant JAHAD SALTER and having spoken with other law enforcement officers and individuals, 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. Quoted text messages are set forth verbatim.

1. An investigation by the USPIS and the United States Postal Inspection Service – Office of the Inspector General ("USPS-OIG") revealed that JAHAD SALTER ("SALTER") purchased from an employee of the United States Postal Service, Khadijah Banks Oneal<sup>1</sup> ("Banks Oneal"), credit cards and United States Treasury Checks that had been stolen from the United States Mail (the "U.S. Mail") and had in his possession stolen U.S. Mail from at least in or about February 4, 2021 through at least in or about March 30, 2021.

2. On or about March 30, 2021, SALTER was arrested by the Newark Police Department's ("NPD") fugitive apprehension team in a hotel room in or around Newark, New Jersey. A cellular telephone was seized from the hotel room where SALTER and another individual were the only occupants ("Salter Phone-1"). Included among the items that were also seized from the hotel room, the car (the "Car") that SALTER was observed driving that was parked in the hotel's parking lot, and a storage unit in or around Bayonne, New Jersey for which a rental payment receipt was found in the Car, were approximately 91 credit and debit cards in third-parties' names; United States Treasury Checks in third-parties' names; United States mail and mailers that appeared to have been sent through the United States mail that were in third-parties' names and contained United States Treasury Checks and credit/debit cards; and fraudulent identification cards, including multiple identification cards that bore the same picture but different names and identifiers.

3. Salter Phone-1 was subsequently searched pursuant to a search warrant issued by the U.S. District Court for the District of New Jersey. Communications on Salter Phone-1 revealed SALTER and Banks Oneal's communications regarding SALTER purchasing from Banks Oneal credit cards and United States Treasury Checks that Banks Oneal had stolen from the United States mail.

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<sup>1</sup> On July 28, 2021, Banks Oneal was charged by criminal complaint with conspiracy to commit access device fraud and mail theft in the District of New Jersey at Magistrate Number 21-11127 (AME).

4. For example, on or about February 20, 2021, after having worked a shift at the DVD Center that afternoon, while in New Jersey, Banks Oneal and SALTER exchanged text messages regarding Banks Oneal's theft of credit cards issued by J.P. Morgan Chase Bank, N.A. ("Chase") from the U.S. Mail and her plans to steal more letters and mail from the U.S. Mail. Namely, Banks Oneal sent a text message to SALTER that stated, "I was only able to grab a few chase idk if it was the snow but everything was done early today shit was light[.]" Shortly thereafter, SALTER replied asking, "And which chase was it[.]" Banks Oneal responded, "Some freedoms[.]" which referred to Chase Freedom-branded credit cards. Later in the conversation, Banks Oneal assured SALTER that she would steal more United States mail the following day in a text message, which stated, "Ok regardless I'm going in tomorrow I have to I know I'll be able to grab grab some other stuff for you[.]"

5. On or about March 22, 2021, Banks Oneal communicated via text message with SALTER regarding Banks Oneal selling stolen mail to SALTER. Banks Oneal sent a text message to SALTER stating, "If I want you can come Get the pieces out the car and leave the money like we did last time[.]" SALTER agreed to go to Banks Oneal's car, which was parked outside of the DVD Center in Kearny, stating "Okay[.] I come in hour[.]" Banks Oneal then directed SALTER as to where SALTER could locate the stolen mail within Banks Oneal's car, writing, "ok the door opened they on the floor underneath my Jean jacket on the passenger side[.]" Later in the conversation, SALTER asked Banks Oneal whether the mail she stole included stimulus checks issued by the United States Department of Treasury, writing "Was it stimmy ?[.]" to which Banks Oneal replied, "No not today[.]" SALTER sent a text message to Banks Oneal confirming that he picked up the stolen mail and had left payment for Banks Oneal in her car, writing, in part, "I put 3k In glove bout to count how many and tell huh difference[.]" Shortly thereafter, SALTER told Banks Oneal that the stolen mail he took from her car included 24 credit cards and 1 check, writing, "I'm taking 24[.] And it was 1 check[.] And some other bs envelopes[.]" After her shift, Banks Oneal sent a text message to SALTER telling SALTER that SALTER had left behind some of the stolen mail in Banks Oneal's car. In response, SALTER asked Banks Oneal what SALTER left behind, writing, "What are they[?]"

6. The next day, on or about March 23, 2021, SALTER and Banks Oneal's text message conversation regarding the stolen U.S. Mail continued. SALTER texted Banks Oneal, "You open them[.]" instructing Banks Oneal to open the stolen mail. Banks Oneal opened the mail as indicated by her reply to SALTER, which stated, "Targets ,AE NEW ACC,. Cities ,gap visa 15, 000 and 9,000[.]" indicating that she found within the stolen mail, credit cards issued by Target, an American Express or American Eagle credit card that was issued

for the first time on a new account, Citibank credit cards, and a Gap Visa credit card.

7. The investigation also revealed that, between at least on or about February 13, 2021 and at least on or about March 28, 2021, SALTER called multiple banks regarding credit cards issued to third parties, many of which have been reported lost, stolen, or not received.

8. For example, between on or about February 13, 2021 and on or about February 19, 2021, SALTER called PNC Bank ("PNC") regarding approximately 8 credit cards that were issued to other people, many of which were reported by PNC as lost, stolen, or not received. Approximately \$48,447.36 in fraudulent charges were attempted on the PNC-issued credit cards about which SALTER called PNC.

