

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

UNITED STATES OF AMERICA	:	Hon.
	:	
v.	:	Crim. No. 22-
	:	
ADEEB SALIH	:	18 U.S.C. § 1349

INFORMATION

The defendant having waived in open court prosecution by Indictment, the Attorney for the United States, acting under Authority Conferred by 28 U.S.C. § 515, for the District of New Jersey charges:

Conspiracy to Commit Bank Fraud

Background

1. At all times relevant to this Information:
 - a. Defendant ADEEB SALIH was a resident of East Orange, New Jersey and elsewhere within New Jersey.
 - b. Yaseen Salih was a resident of Iselin, New Jersey and elsewhere within New Jersey.
 - c. Jahad Salter (“Salter”) was a resident of Newark, New Jersey.
 - d. Khadijah Banks Oneal (“Banks Oneal”) was an employee of the United States Postal Service (“USPS”), employed at Dominick V. Daniels Processing and Distribution Center (the “DVD Center”), in Kearny, New Jersey.
 - e. Ashley Taylor (“Taylor”) was an employee of the USPS, employed at the Murray Hill Carrier Annex United States Post Office (“Murray Hill USPO”) in Manhattan, New York.

f. The victim banks were “Financial Institutions,” as defined by Title 18, United States Code, Section 20, whose deposits were insured by the Federal Deposit Insurance Corporation (“FDIC”) and who offered credit cards, debit cards, and checking accounts to customers, among other services.

The Conspiracy

2. From on or about January 28, 2021 through on or about November 2, 2021, in Essex County, in the District of New Jersey and elsewhere, defendant

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knowingly and intentionally did conspire and agree with Yaseen Salih, Jihad Salter, Ashley Taylor, Kadajah Banks Oneal, and others (collectively, the “Co-Conspirators”) to execute a scheme and artifice to defraud financial institutions, as defined in Title 18, United States Code, Section 20, whose deposits were insured by the FDIC, and to obtain moneys, funds, assets, and other property owned by and under the custody and control of such financial institutions, by means of materially false and fraudulent pretenses, representations, and promises, contrary to Title 18, United States Code, Section 1344.

Goal of the Conspiracy

3. It was the goal of the conspiracy for ADEEB SALIH and the Co-Conspirators to enrich themselves by fraudulently obtaining money from Financial Institutions.

Manner and Means of the Conspiracy

4. It was part of the conspiracy that:

a. ADEEB SALIH purchased and obtained credit cards (“Stolen Credit Cards”), personal checks and checks issued by the U.S. Treasury (collectively, “Stolen Checks”), and other financial instruments from Yaseen Salih and Salter. The Stolen Credit Cards, Stolen Checks, and other financial instruments had been issued by or were linked with accounts at the victim banks.

b. Yaseen Salih obtained the Stolen Credit Cards, Stolen Checks, and other financial instruments from others, including USPS employee Taylor, who stole envelopes containing the Stolen Credit Cards, Stolen Checks, and other financial instruments that were in the mail at the Murray Hill USPO, which were intended to be delivered to persons at addresses within New York, New York, and provided them to Yaseen Salih in New York, New York, Orange, New Jersey, and elsewhere, in exchange for compensation.

c. Salter obtained the Stolen Credit Cards, Stolen Checks, and other financial instruments from others, including USPS employee Banks Oneal, who stole envelopes containing the Stolen Credit Cards, Stolen Checks, and other financial instruments that were in the mail at the DVD Center, which were intended to be delivered to persons at addresses within New Jersey, and provided them to Salter in Jersey City, New Jersey and elsewhere, in exchange for compensation.

d. ADEEB SALIH, Yaseen Salih, Salter, and Banks Oneal used personal identifying information belonging to third-party accountholders, which was obtained using the internet, to fraudulently pose as the accountholders

when calling the victim banks to ascertain and/or increase credit limits, change information, activate Stolen Credit Cards, and challenge declined transactions. ADEEB SALIH and the Co-Conspirators then fraudulently used the Stolen Credit Cards to, among other things, make purchases at retail stores in New Jersey and elsewhere.

e. In total, the victim banks reported that over approximately \$300,000 in fraudulent charges were attempted on the same Stolen Credit Cards about which ADEEB SALIH, Yaseen Salih, Salter, and/or Banks Oneal called. The fraud resulted in losses to the victim banks of over approximately \$110,000.

f. ADEEB SALIH also deposited the Stolen Checks in bank accounts that were in the names of third-parties but were under ADEEB SALIH's control. After depositing the stolen checks, ADEEB SALIH withdrew some or all of the proceeds of the stolen checks from those accounts in the form of cash.

In violation of Title 18, United States Code, Section 1349.

FORFEITURE ALLEGATIONS

1. Upon conviction of the offense charged in this Information, defendant

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shall forfeit to the United States, pursuant to 18 U.S.C. § 982(a)(2)(A), all property, real and personal, that constitutes and is derived from proceeds the defendant obtained directly and indirectly as a result of the violation of Title 18, United States Code, Section 1349, alleged in this Information, and all property traceable to such property.

2. The property subject to forfeiture includes, but is not limited to, all of the defendant's right, title, and interest in approximately \$1,961 in U.S. currency seized from defendant ADEEB SALIH on or about November 2, 2021.

SUBSTITUTE ASSETS PROVISION

3. If any of the above-described forfeitable property, as a result of any act or omission of defendant ADEEB SALIH:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. § 982(b), to seek forfeiture of any other property of

said defendant up to the value of the forfeitable property described above.



VIKAS KHANNA
Attorney for the United States
Acting Under Authority Conferred
by 28 U.S.C. § 515