

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

UNITED STATES OF AMERICA	:	Hon.
	:	
	:	Criminal No. 23-
v.	:	
	:	<u>Count 1</u>
	:	18 U.S.C. § 201(b)(1)(A) and (C)
HALIMATOU NDIAYE	:	(Bribery)
	:	
	:	<u>Count 2</u>
	:	18 U.S.C. § 1349
	:	(Conspiracy to Commit Bank Fraud)

INFORMATION

The defendant having waived in open court prosecution by indictment, the United States Attorney for the District of New Jersey charges:

Count 1
(Bribery)

1. At all times relevant to Count 1 of this Information:
 - a. Defendant HALIMATOU NDIAYE was a resident of the Bronx, New York and Orange, New Jersey.
 - b. “Mail Carrier 1” and “Mail Carrier 2” were employed by the United States Postal Service (USPS) as mail carriers in East Orange, New Jersey.
 - c. “Mail Carrier 3” and “Mail Carrier 4” were employed by the USPS as mail carriers in Newark, New Jersey.
 - d. “Undercover Postal Inspector 1” was a USPIS Postal Inspector who posed undercover as a mail carrier employed by the USPS.

e. The “Victim Financial Institutions” all were financial institutions, as defined by 18 U.S.C. § 20, offering, among other things, checks and credit cards to customers.

2. From in or about June 2021 to on or about July 13, 2021, in Essex County, in the District of New Jersey, and elsewhere, defendant

HALIMATOU NDIAYE

did, directly and indirectly, corruptly give, offer, and promise things of value, namely, more than \$5,000 in United States currency, to public officials, namely, USPS employees, with intent to influence official acts and to induce such officials to do and omit to do acts in violation of their lawful duties.

3. NDIAYE schemed to bribe USPS mail carriers in East Orange and Newark by offering them cash (typically \$5,000) in exchange for the mail carriers giving NDIAYE and others a USPS arrow key that can be used to access a variety of USPS mail receptacles. NDIAYE and others sought USPS arrow keys so that they could steal mail matter.

4. Specifically, NDIAYE schemed to pay cash bribes to Mail Carriers 1, 2, 3, and 4 (collectively, “the USPS mail carriers”), as well as to Undercover Postal Inspector 1, who NDIAYE and another individual believed was a mail carrier, to induce them to provide a USPS arrow key. For example, from in or about June 10, 2021 to June 12, 2021, NDIAYE and another individual, in NDIAYE’s vehicle, drove to various locations in East Orange and Newark, New Jersey, where they stopped

the USPS Mail Carriers and handed them a note indicating that they would give \$5,000 to the mail carrier in exchange for an arrow key.

In violation of Title 18, United States Code, Sections 201(b)(1)(A) and (C).

Count 2
(Conspiracy to Commit Bank Fraud)

1. The allegations set forth in paragraphs 1 and 3-4 of Count 1 are realleged here.

THE CONSPIRACY

2. From in or about January 2021 to in or about July 2021, in Essex County, in the District of New Jersey, and elsewhere, defendant

NDIAYE HALIMATOU

did knowingly and intentionally conspire and agree with others to execute a scheme and artifice to defraud financial institutions whose deposits were insured by the Federal Deposit Insurance Corporation, namely, the Victim Financial Institutions, and to obtain moneys, funds, credits, 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 NDIAYE and others to obtain checks and bank cards (such as debit and credit cards) stolen from the United States mail and obtain funds fraudulently from the Victim Financial Institutions using these stolen checks and cards.

MANNER AND MEANS OF THE CONSPIRACY


4. It was part of the conspiracy that NDIAYE and others obtained checks and bank cards that did not belong to them and were stolen from the United States mail.

5. It was further part of the conspiracy that NDIAYE and others used and exchanged stolen checks and bank cards to obtain funds fraudulently from the Victim Financial Institutions by, among other things, altering the names of the payees and amounts on stolen checks to draw funds from bank accounts linked to the altered checks and fraudulently using the identification of other individuals to deposit into and withdraw funds from those individuals' bank accounts.

6. It was further part of the conspiracy that NDIAYE and others sent and received text messages concerning both items stolen from the mail and the transactions they conducted involving the Victim Financial Institutions to obtain funds fraudulently using the checks and bank cards stolen from the mail.

7. It was further part of the conspiracy that NDIAYE and others attempted to obtain a USPS arrow key by offering the USPS Mail Carriers \$5,000 in cash for an arrow key, which could be used to open USPS receptacles to steal financial instruments from the mail.

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


PHILIP R. SELLINGER
United States Attorney

CASE NUMBER: _____

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District of New Jersey**

UNITED STATES OF AMERICA

v.

HALIMATOU NDIAYE

INFORMATION FOR

18 U.S.C. § 201(b)(1)(A) and (C)
18 U.S.C. §§ 1344 and 1349

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