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

UNITED STATES OF AMERICA : Hon. Steven C. Mannion
 :
 v. : Mag. No. 18-6095
 :
 TALAT ALI MAAN, : CRIMINAL COMPLAINT
 SYED REHMAN, :
 KASHIF IDREES, :
 JAWEED WAHED AHMED, and :
 FATOU DJAMBO :

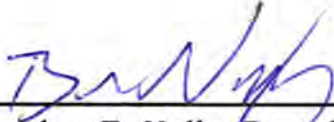
I, Brendan E. Nally, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

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 pages and made a part hereof.



Brendan E. Nally, Postal Inspector
U.S. Postal Inspection Service

Sworn to before me, and
Subscribed in my presence

May 22, 2018 at
Newark, New Jersey

HONORABLE STEVEN C. MANNION
UNITED STATES MAGISTRATE JUDGE



Signature of Judicial Officer

ATTACHMENT A

From at least as early as in or about January 2015 through in or about March 2018, in the District of New Jersey, and elsewhere, defendants

**TALAT ALI MAAN,
SYED REHMAN,
KASHIF IDREES,
JAWEED WAHED AHMED, and
FATOU DJAMBO**

did knowingly and intentionally conspire and agree with each other and others to execute a scheme and artifice to defraud financial institutions, as defined in Title 18, United States Code, Section 20, and to obtain money, 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.

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

ATTACHMENT B

I, Brendan E. Nally, am a Postal Inspector with the United States Postal Inspection Service (“USPIS”). I am familiar with the facts set forth in this Complaint based on my own investigation, conversations with other law enforcement officers, and my review of reports, documents, and other evidence. Because this Complaint is being submitted for the limited purpose of establishing probable cause, I have not included each and every fact that I know concerning this investigation. Unless specifically indicated, all conversations and statements described herein are related in substance and in part.

Overview of the Conspiracy

1. At all times relevant to this Complaint:
 - a. Defendants TALAT ALI MAAN (“MAAN”), SYED REHMAN (“REHMAN”), KASHIF IDREES (“IDREES”), JAWEED WAHED AHMED (“AHMED”), and FATOU DJAMBO (“DJAMBO”), along with other known and unknown uncharged co-conspirators (collectively, the “Co-Conspirators”), engaged in a fraudulent scheme to use stolen and fraudulently altered identities to obtain credit cards from financial institutions and then use those credit cards to make purchases that they had no intention to repay, leaving the financial institutions to bear the losses of the scheme.
 - b. Specifically, the Co-Conspirators stole the identities of actual people and then, in many cases, created “synthetic identities” by pairing the name and social security number for an actual person with a fictitious birth date. When creating the synthetic identities, the Co-Conspirators often used the name and social security number of a minor and paired them with a birth date that made the identity appear to be that of an adult.
 - c. The Co-Conspirators then used the stolen and synthetic identities to obtain lines of credit, primarily through opening credit card accounts at financial institutions (the “Fraud Cards”). The Fraud Cards were maintained in good standing with the financial institutions long enough to establish the creditworthiness of the stolen and synthetic identities. The Co-Conspirators then “busted out” the Fraud Cards by making large purchases and never repaying the debts associated with those purchases.
 - d. The Co-Conspirators also incorporated and registered in various states numerous purported companies that did little or no legitimate

business (the “Sham Companies”). The Co-Conspirators obtained credit card processing equipment by opening merchant processing accounts in the names of the Sham Companies, and then used that equipment to make fraudulent charges on the Fraud Cards.

e. REHMAN maintained a business called the “7 Even Food Mart,” located on New York Avenue in Jersey City, New Jersey, which was a convenience store located at the same address as a gas station. From time to time, the Co-Conspirators used the 7 Even Food Mart to make fraudulent charges to the Fraud Cards. The Co-Conspirators also used the Fraud Cards to purchase merchandise from a Secaucus, New Jersey, warehouse store that they then sold for a profit at the convenience store.

f. The Co-Conspirators routinely used “Drop Addresses” in New Jersey, New York, Pennsylvania, and Maryland as the purported mailing addresses for the Fraud Cards and the Sham Companies. These Drop Addresses were controlled by the Co-Conspirators for the purpose of receiving mail sent in connection with the Fraud Cards and the Sham Companies.

Drop Addresses

2. It was a part of the conspiracy that the following Drop Addresses were established, maintained, and used by the Co-Conspirators in furtherance of their fraudulent scheme:

a. A residence on Morris Avenue in Elizabeth, New Jersey, that was rented by MAAN using a stolen and/or fraudulent identity in the name of “DP” (the “Morris Avenue Drop Address”). On or about December 22, 2015, Postal Inspectors conducted surveillance at the Morris Avenue Drop Address. A man was observed opening the mailboxes on the exterior of the building and removing mail from them. Postal Inspectors followed the man as he left in a Hyundai vehicle with Maryland dealer plates and headed to a nearby bank. A records check for revealed that in July 2015, a traffic citation was issued to MAAN in Maryland for violations committed while driving the same vehicle.

b. A residence on New York Avenue in Jersey City, New Jersey, that is located within walking distance of the 7 Even Food Mart, the convenience store operated by REHMAN, and was rented by the Co-Conspirators using stolen and/or fraudulent identities (the “New York Avenue Drop Address”).

c. A residence on Grey Eagle Court in Germantown, Maryland (the "Grey Eagle Court Drop Address"), that was rented by MAAN and used as a mailing address for various Sham Companies by IDREES.

d. A residence on 62nd Street in Philadelphia, Pennsylvania (the "62nd Street Drop Address") that was associated with DJAMBO and used as the purported home address for several Fraud Cards for which the Co-Conspirators applied.

e. A business located on 58th Street in Philadelphia, Pennsylvania (the "58th Street Drop Address") from which DJAMBO operated a beauty salon and barber shop and that was also used as the purported home address for several Fraud Cards for which the Co-Conspirators applied.

Sham Companies

3. It was a further part of the conspiracy that the following Sham Companies were established, maintained, and used by the Co-Conspirators in furtherance of their fraudulent scheme:

a. "C&D Carpet Services, Inc." which was created and controlled by MAAN and AHMED and registered in the name of the stolen or synthetic identity "DP," using the Morris Avenue Drop Address.

b. "High Construction & Landscaping," which was created and controlled by MAAN and AHMED and registered in the name of the stolen or synthetic identity "DP," using the Morris Avenue Drop Address.

c. "Irongate Construction Corporation," which was created and controlled by IDREES and registered in IDREES's own name. Based on my review of mailings that have been recently addressed to the Grey Eagle Court Drop Address, several have been addressed to or otherwise reference Irongate Construction Corporation.

d. "Napoli Furniture," which was created and controlled by MAAN and registered in the name of the stolen or synthetic identity "CK," using an address in Philadelphia, Pennsylvania.

e. "Sharkeya Urban Boutique," which was created and controlled by the Co-Conspirators and registered in the name of the stolen or synthetic identity "RA," using the 58th Street Drop Address.

Fraud Cards

4. It was a further part of the conspiracy that the Fraud Cards that were opened and used fraudulently by the Co-Conspirators included, but are not limited to, the Fraud Cards summarized below.

"RA" Stolen Identity

5. The Co-Conspirators opened a Fraud Card using the stolen identity of "RA" with Financial Institution #1 on or about January 17, 2017 (the "RA Fraud Card"). At all relevant times, the deposits of Financial Institution #1 were insured by the Federal Deposit Insurance Corporation ("FDIC"). The RA Fraud Card was opened online from an IP address associated with the New York Avenue Drop Address. When opening the RA Fraud Card, the Co-Conspirators used the 58th Street Drop Address, the address of DJAMBO's business, as RA's purported home address.

6. On or about January 27, 2017, the Co-Conspirators used the RA Fraud Card for an approximately \$9,800 purchase at C & D Carpet Services, Inc. a Sham Company controlled by MAAN and AHMED.

7. Between on or about February 13, 2017, and on or about March 7, 2017, the Co-Conspirators used the RA Fraud Card to make five separate charges at Irongate Construction Corporation, a Sham Company controlled by IDREES, totaling approximately \$13,100.

8. On or about March 2, 2017, based on store surveillance video that I have reviewed, REHMAN used the RA Fraud Card to make an approximately \$2,600 purchase at a warehouse store in Secaucus, New Jersey.

9. On or about March 4, 2017, the Co-Conspirators used the RA Fraud Card for an approximately \$3,705 purchase at Sharkeya Urban Boutique, a Sham Company registered to the Drop Address controlled by DJAMBO (the same Drop Address that was listed as the purported mailing address for RA in connection with the RA Fraud Card).

10. On or about March 7, 2017, the Co-Conspirators used the RA Fraud Card for an approximately \$4,850 purchase at 7 Even Food Mart Corp., a convenience store operated by REHMAN.

11. The above charges by the Co-Conspirators were never repaid. Financial Institution #1 suffered a total loss on the RA Fraud Card of approximately \$43,502.23.

“HP” Stolen Identity

12. The Co-Conspirators opened a Fraud Card using the stolen identity of “HP” with Financial Institution #2 on or about February 5, 2017 (the “HP Fraud Card”). At all relevant times, the deposits of Financial Institution #2 were insured by the FDIC. When opening the HP Fraud Card, the Co-Conspirators used the 58th Street Drop Address, the address of DJAMBO’s business, as HP’s purported home address.

13. Between on or about April 18, 2017, and on or about May 2, 2017, the Co-Conspirators used the HP Fraud Card to make six separate charges at Irongate Construction Corporation, a Sham Company controlled by IDREES, totaling approximately \$41,114.

14. Between on or about March 25, 2017, and on or about May 3, 2017, the Co-Conspirators used the HP Fraud Card to make three separate charges at C & D Carpet Services, Inc., a Sham Company controlled by MAAN and AHMED, totaling approximately \$19,650.

15. Between on or about April 1, 2017 and on or about May 2, 2017, based on store surveillance video that I have reviewed, REHMAN and IDREES used the HP Fraud Card to make purchases totaling approximately \$16,590.23 at a warehouse store in Secaucus, New Jersey.

16. The above charges by the Co-Conspirators were never repaid. Financial Institution #2 suffered a total loss on the HP Fraud Card of approximately \$81,000.

“HS” Synthetic Identity

17. The Co-Conspirators created a synthetic identity for “HS” by pairing the actual social security number assigned to HS with a date of birth that does not match HS’s actual date of birth. The Co-Conspirators used the HS synthetic identity to open at least five Fraud Cards.

18. On or about October 5, 2017, the Co-Conspirators opened a Fraud Card with Financial Institution #3 using the “HS” synthetic identity (“HS Fraud

Card-1"). At all relevant times, the deposits of Financial Institution #3 were insured by the FDIC. On or about October 21, 2017, the Co-Conspirators used HS Fraud Card-1 to charge approximately \$2,500 at Irongate Construction Corporation, a Sham Company controlled by IDREES.

19. On or about October 16, 2017, based on store surveillance video that I have reviewed, MAAN used HS Fraud Card-1 to make an approximately \$45.55 purchase at a home improvement store in Germantown, Maryland.

20. On or about October 24 2017, the Co-Conspirators used HS Fraud Card-1 to charge approximately \$975 at Napoli Furniture, a Sham Company controlled by MAAN.

21. On or about October 27, 2017, the Co-Conspirators attempted to purchase a "Bluetooth Magstripe Encoder Credit Card Reader," a device used to facilitate credit card transactions, using HS Fraud Card-1. The purchase was supposed to be shipped to IDREES at a Drop Address in Gaithersburg, Maryland, but the retailer selling the card reader denied the transaction.

22. The above charges by the Co-Conspirators were never repaid. Financial Institution #3 suffered a total loss of approximately \$16,548.71 on HS Fraud Card-1.

23. On or about October 17, 2017, the Co-Conspirators opened a Fraud Card with Financial Institution #2 using the HS synthetic identity ("HS Fraud Card-2"). HS Fraud Card-2 was opened using the same Drop Address that the Co-Conspirators used for HS Fraud Card-1.

24. On or about December 12, 2017, the Co-Conspirators used HS Fraud Card-2 to charge approximately \$2,895 at Napoli Furniture, a Sham Company controlled by MAAN.

25. On or about December 16, 2017, the Co-Conspirators used HS Fraud Card-2 to charge approximately \$3,950 at Irongate Construction Corporation, a Sham Company controlled by IDREES.

26. Between on or about December 11, 2017 and on or about December 22, 2017, based on store surveillance video that I have reviewed, MAAN used HS Fraud Card-2 to purchase a total of 122 gallons of milk totaling approximately \$186.32 at a retailer in Germantown, Maryland.

27. The above charges by the Co-Conspirators were never repaid. Financial Institution #2 suffered a total loss of approximately \$9,741.79 on HS Fraud Card-2.

“EH” Synthetic Identity

28. The Co-Conspirators created a synthetic identity for “EH” by pairing the actual social security number assigned to EH with a date of birth earlier than EH’s actual date of birth. The Co-Conspirators then used the EH synthetic identity to open at least twelve Fraud Cards. These EH Fraud Cards used the Morris Avenue Drop Address as the purported mailing address for “EH.”

29. On or about December 23, 2016, the Co-Conspirators used a Fraud Card opened using the EH synthetic identity (“EH Fraud Card-1”) with Financial Institution #4 to charge approximately \$3,985 at C & D Carpet Services, Inc., a Sham Company controlled by AHMED. At all relevant times, the deposits of Financial Institution #4 were insured by the FDIC.

30. The above charge by the Co-Conspirators was never repaid. Financial Institution #4 suffered a total loss of approximately \$13,170.92 on EH Fraud Card-1.

31. On or about January 4, 2017, the Co-Conspirators used another Fraud Card opened using the EH synthetic identity (“EH Fraud Card-2”) with Financial Institution #5 to charge approximately \$1,361 purchase at 7 Even Food Mart Corp., a convenience store operated by REHMAN. At all relevant times, the deposits of Financial Institution #5 were insured by the FDIC.

32. The above charge by the Co-Conspirators was never repaid. Financial Institution #5 suffered a total loss of approximately \$6,845.46 on EH Fraud Card-2.

33. The losses to financial institutions on the twelve Fraud Cards opened using the EH synthetic identity total approximately \$56,738.59.

Total Losses From the Scheme

34. In total, the losses calculated to date from the Co-Conspirators’ scheme exceed \$2.5 million.