

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

UNITED STATES OF AMERICA : Hon.
 :
 v. : Crim. No. 19-
 :
 HAMILTON EROMOSELE, : 18 U.S.C. § 1349
 a/k/a "Don Sele," :
 a/k/a "Emmanuel Eromosele" :

I N F O R M A T I O N

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

The Conspiracy

1. From in or around 2015 through in or around January 2019, in Essex County, in the District of New Jersey and elsewhere, the defendant,

HAMILTON EROMOSELE,
a/k/a "Don Sele,"
a/k/a "Emmanuel Eromosele,

knowingly and intentionally conspired and agreed with others to commit bank fraud, specifically, to knowingly execute and attempt to execute a scheme and artifice to defraud a financial institution, the deposits of which were then insured by the Federal Deposit Insurance Corporation, and to obtain the money, funds, credits, assets, securities, and other property owned by, and under the custody and control of, such financial institution, by means of materially false and fraudulent pretenses, representations, and promises, with the intent to deceive such financial institution, contrary to Title 18, United States Code, Section 1344.

Background

2. The conspiracy involved a network of individuals who travelled around the United States in order to use stolen credit card information to purchase gift cards, flights, hotels, rental cars, and other goods and services. Women were often recruited via social media, with promises of easy profits, to fly to various locations to make fraudulent purchases.

3. At all times relevant to the Information:

- a. HAMILTON EROMOSELE, a/k/a “Donald Sele,” a/k/a “Emmanuel Eromosele” (“EROMOSELE”), was a leader of the network, operating primarily in New York and New Jersey, responsible for obtaining stolen credit card information through the “dark web” and other sources.¹ EROMOSELE also recruited women on various social media platforms to execute the fraud and make travel arrangements for co-conspirators. Finally, EROMOSELE collected his co-conspirators’ fraudulently purchased gift cards or luxury goods, sold them for cash, and dispersed a percentage of the proceeds to the co-conspirators;

¹ The “dark web” refers to a portion of the Internet that is only accessible by means of special software that is designed to make the activity of users and website operators less overt.

- b. YOUSOUF TRAORE, a/k/a “Slim” (“TRAORE”) was a member of the conspiracy who made trips around the United States to carry out the scheme;
- c. DEJA HANDSFORD (“HANDSFORD”) was a member of the conspiracy who made trips around the United States to carry out the scheme;
- d. KAISHCE ENGLISH (“ENGLISH”) was a member of the conspiracy who made trips around the United States to carry out the scheme;
- e. EDWARD DORSEY (“DORSEY”) was a member of the conspiracy who made trips around the United States to carry out the scheme;
- f. GEORGE EDANDISON, a/k/a “Promise Edandison” (“EDANDISON”) was a member of the conspiracy who made trips around the United States to carry out the scheme;
- g. QUINCY WIELINGEN (“WIELINGEN”) was a member of the conspiracy who made trips around the United States to carry out the scheme; and
- h. Victim Company-1 was a financial institution, the deposits of which were insured by the Federal Deposit Insurance Corporation.

Object of the Conspiracy

- 4. The object of the conspiracy was for EROMOSELE and his co-

conspirators to enrich themselves by purchasing goods and services using stolen credit card information.

Manner and Means of the Conspiracy

5. EROMOSELE obtained thousands of stolen credit card accounts that he provided to co-conspirators for use in making fraudulent purchases. For example, EROMOSELE's laptop, recovered in or around May 2016 in East Rutherford, New Jersey, listed at least 700 stolen credit card accounts.

6. Likewise, EROMOSELE's phone ("Phone-1"), recovered in or around November 2016, contained numerous text messages and photographs conveying credit card account information for use in the scheme. For example, on or about November 24, 2016, Phone-1 texted another phone number a credit card number used the next day to make unauthorized purchases.

7. In or around August 2018, law enforcement found EROMOSELE in possession of a vehicle rented using stolen credit card information in Lehigh County, Pennsylvania. EROMOSELE's laptop, recovered during that incident, listed at least 150 stolen credit card accounts.

8. In or around January 2019, law enforcement arrested EROMOSELE in an apartment in New Rochelle, New York—rented using co-conspirator ENGLISH's fraudulent identification—that contained numerous fraudulent credit cards issued by Victim Company-1 and a fraudulent identification card bearing EROMOSELE's photographs.

All in violation of Title 18, United States Code, Section 1349.

FORFEITURE ALLEGATION

As a result of committing the conspiracy to commit bank fraud offense charged in this Information, the defendant,

HAMILTON EROMOSELE,
a/k/a "Don Sele,"
a/k/a "Emmanuel Eromosele,

shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(2), any property constituting or derived from proceeds obtained directly or indirectly as a result of the violation of Title 18, United States Code, Section 1349 alleged in this Information.

Substitute Assets Provision

If any of the property described above, as a result of any act or omission of the defendant:

- 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 Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1) and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of such defendant up to the value of the forfeitable property described above.



CRAIG CARPENITO
United States Attorney

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UNITED STATES OF AMERICA

v.

**HAMILTON EROMOSELE,
a/k/a “Don Sele,”
a/k/a “Emmanuel Eromosele”**

INFORMATION FOR

18 U.S.C. § 1349

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