

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

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

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:

(Conspiracy to Commit Bank Fraud)

1. At all times relevant to this Information:

Background

a. Defendant HAKIR BROWN was a resident of Newark, New Jersey.

b. Jahad Salter (“Salter”) was a resident of Newark, New Jersey.

c. Dashaun Brown was a resident of Newark and elsewhere within 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. The victim financial institutions, including Bank-1 and Bank-2, 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 and debit cards to customers, among other services.

f. “Accountholder A” was a customer of Bank-1 who resided in Edison, New Jersey.

The Conspiracy

2. From on or about January 16, 2020 to on or about August 26, 2021, in Essex County, in the District of New Jersey and elsewhere, defendant

HAKIR BROWN

knowingly and intentionally did conspire and agree with Salter, Banks Oneal, Dashaun Brown, and others (collectively, the “Co-Conspirators”) to execute a scheme and artifice to defraud financial institutions whose deposits were insured by the Federal Deposit Insurance Corporation, 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 HAKIR BROWN and the Co-Conspirators to enrich themselves by fraudulently obtaining money from victim financial institutions.

Manner and Means of the Conspiracy

4. It was part of the conspiracy that:

a. HAKIR BROWN, Salter, and Dashaun Brown arranged for USPS employees, including Banks Oneal, to steal mail containing credit cards (the “Stolen Credit Cards”) and other financial instruments (including checks)

from the U.S. mail, which were intended to be delivered to persons at addresses within New Jersey.

b. At varying times, Banks Oneal provided the Stolen Credit Cards and other financial instruments directly to HAKIR BROWN, Salter, and Dashaun Brown, in exchange for compensation.

c. HAKIR BROWN also distributed certain of the Stolen Credit Cards that he obtained from Banks Oneal to others, including Salter and Dashaun Brown.

d. For example, on or about August 28, 2020, HAKIR BROWN sent a text message to Salter in which HAKIR BROWN offered to supply Salter with stolen credit cards – referred to as “new work” – and attempted to arrange to meet. Salter was unable to meet at that time but told HAKIR BROWN to contact Dashaun Brown instead. Based on the connection Salter facilitated, later the same day, HAKIR BROWN supplied Dashaun Brown with stolen credit cards.

e. On or about September 6, 2020, HAKIR BROWN sent a text message to Salter that read, “[Bank-2] just came in you want em” – offering to sell Salter multiple Bank-2 credit cards that had been issued to third parties. Salter agreed to purchase the Stolen Credit Cards, texting, “Yes all of them.” HAKIR BROWN and Salter met the next day, in or around Newark, to complete the sale.

f. On or about June 17, 2021, HAKIR BROWN was arrested in Newark for driving a stolen vehicle. Law enforcement recovered from the stolen

vehicle a number of items, including 62 credit/debit cards in third-parties' names, at least approximately 47 of which were still attached to mailers.

g. HAKIR BROWN and the Co-Conspirators used personal identifying information belonging to third-party accountholders that they obtained using the internet to fraudulently pose as the accountholders when calling the Financial Institutions to ascertain and/or increase credit limits, change information, activate Stolen Credit Cards, and challenge declined transactions. HAKIR BROWN 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.

h. In total, the Financial Institutions reported that approximately \$307,584.41 in fraudulent charges were attempted on the same Stolen Credit Cards about which HAKIR BROWN, Salter, Dashaun Brown, and/or Banks Oneal called to inquire. The fraud resulted in an actual loss to the Financial Institutions of approximately \$207,887.47.

i. For example, HAKIR BROWN called Bank-1 approximately 77 times between on or about January 30, 2020 and on or about May 30, 2021 regarding approximately 32 credit cards, including three of the credit cards seized from HAKIR BROWN on or about June 17, 2021. Bank-1 confirmed that it received reports of fraudulent activities on approximately 28 of the credit cards, all of which were reported as not delivered or lost/stolen between in or about January 2020 and on or about May 22, 2021.

j. Specifically, on or about February 26, 2021 and between on or about March 2, 2021 and on or about March 18, 2021, HAKIR BROWN called Bank-1 approximately 10 times regarding a credit card issued to Accountholder-A (“Account-A”). Between on or about March 7, 2021 and on or about March 17, 2021, Account-A was used without Accountholder-A’s authorization approximately 6 times to purchase goods totaling approximately \$10,237.36 from stores in Bayonne, Union, and Phillipsburg, New Jersey.

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

FORFEITURE ALLEGATIONS

1. The allegations contained in this Information are realleged here for the purposes of noticing forfeiture, pursuant to Title 18, United States Code, Section 982(a)(2)(A).

2. The United States hereby gives notice to defendant that, upon conviction of the offense charged in this Information, defendant

HAKIR BROWN

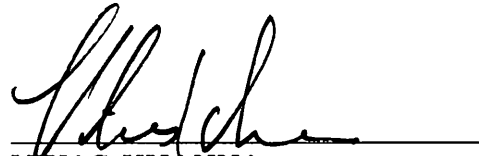
shall forfeit to the United States, pursuant to 18 U.S.C. § 982(a)(2)(A), all property, real and personal, that constitutes and is derived from proceeds the defendant obtained directly or indirectly as a result of the violation of Title 18, United States Code, Section 1349, alleged in this Information.

SUBSTITUTE ASSETS PROVISION

3. If by any act or omission of HAKIR BROWN, any of the property subject to forfeiture described herein:

- 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,

the United States will be entitled to forfeiture of substitute property up to the value of the property described above, pursuant to Title 18, United States Code, Section 982(b) and Title 21, United States Code, Section 853(p).

A handwritten signature in black ink, appearing to read 'Vikas Khanna', written over a horizontal line.

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