

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

TAMEKA BABULAL,
a/k/a Tameka Williams,
a/k/a Sharniece Williams,
a/k/a Meek Williams,
JOEL BABULAL,
a/k/a Joel Nical Babulal,

Defendants.

AMENDED COMPLAINT

Violations of 18 U.S.C. §§ 1709,
1344, 1349, 1028A, and 2

COUNTY OF OFFENSE:
WESTCHESTER

SOUTHERN DISTRICT OF NEW YORK, ss.:

ANTHONY GIATTINO, Special Agent with U.S. Postal Service Office of Inspector General (the "USPS OIG"), being duly sworn, deposes and states:

COUNT ONE

(Theft of Mail by Postal Service Officer or Employee)

1. From at least in or about July 2023 through in or about February 2024, in the Southern District of New York, TAMEKA BABULAL a/k/a Tameka Williams a/k/a Sharniece Williams a/k/a Meek Williams, the defendant, being a Postal Service officer and employee, knowingly embezzled a letter, postal card, package, bag, and mail, and an article and thing contained therein entrusted to her and which came into her possession intended to be conveyed by mail, and carried and delivered by a carrier, messenger, agent, and other person employed in a department of the Postal Service, and forwarded through and delivered from a post office and station thereof established by authority of the Postmaster General and of the Postal Service, and stole, abstracted, and removed from such letter, package, bag, and mail, an article and thing contained therein, to wit, BABULAL stole credit cards, checks, personal identifying information, and other items from the mail that she was entrusted to deliver from the U.S. Postal Service Processing and Distribution Center in Mount Vernon, New York.

(Title 18, United States Code, Section 1709.)

COUNT TWO

(Conspiracy to Commit Wire Fraud and Bank Fraud)

2. From at least on or about December 27, 2022, through at least in or about October 2023, in the Southern District of New York and elsewhere, TAMEKA BABULAL a/k/a Tameka Williams a/k/a Sharniece Williams a/k/a Meek Williams and JOEL BABULAL a/k/a Joel Nical

Babulal, the defendants, and others known and unknown, willfully and knowingly combined, conspired, confederated, and agreed together and with each other to commit wire fraud, in violation of Title 18, United States Code, Section 1343, and bank fraud, in violation of Title 18, United States Code, Section 1344, to wit, TAMEKA BABULAL and JOEL BABULAL agreed to make and cause to be made false and fraudulent statements, using the Internet, in order to fraudulently obtain funds from financial institutions, including through mobile payment service companies.

3. It was a part and an object of the conspiracy that TAMEKA BABULAL a/k/a Tameka Williams a/k/a Sharniece Williams a/k/a Meek Williams and JOEL BABULAL a/k/a Joel Nical Babulal, the defendants, and others known and unknown, knowingly having devised and intending to devise a scheme and artifice to defraud, and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises, would and did transmit and cause to be transmitted by means of wire, radio, and television communication in interstate and foreign commerce, writings, signs, signals, pictures, and sounds for the purpose of executing such scheme and artifice, which affected a financial institution, in violation of Title 18, United States Code, Section 1343.

4. It was a further part and an object of the conspiracy that TAMEKA BABULAL a/k/a Tameka Williams a/k/a Sharniece Williams a/k/a Meek Williams and JOEL BABULAL a/k/a Joel Nical Babulal, the defendants, and others known and unknown, willfully and knowingly, would and did 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 moneys, funds, credits, assets, securities, and other property owned by, and under the custody and control of, such financial institution, by means of false and fraudulent pretenses, representations, and promises, in violation of Title 18, United States Code, Section 1344.

(Title 18, United States Code, Section 1349.)

COUNT THREE
(Bank Fraud)

5. From at least on or about December 27, 2022, through at least in or about October 2023, in the Southern District of New York and elsewhere, TAMEKA BABULAL a/k/a Tameka Williams a/k/a Sharniece Williams a/k/a Meek Williams, the defendant, knowingly executed, and attempted to execute, a scheme and artifice to defraud a financial institution, as that term is defined in Title 18, United States Code, Section 20, and to obtain moneys, funds, credits, assets, securities, and other property owned by, and under the custody and control of, such a financial institution, by means of false and fraudulent pretenses, representations, and promises, to wit, BABULAL engaged in a scheme to make and cause to be made false statements to financial institutions in order to fraudulently obtain funds.

(Title 18, United States Code, Sections 1344 and 2.)

COUNT FOUR
(Aggravated Identity Theft)

6. From at least in or about July 6, 2023, through at least in or about September 13, 2023, in the Southern District of New York and elsewhere, TAMEKA BABULAL a/k/a Tameka Williams a/k/a Sharniece Williams a/k/a Meek Williams, the defendant, knowingly transferred, possessed, and used, without lawful authority, a means of identification of another person, during and in relation to a felony violation enumerated in Title 18, United States Code, Section 1028A(c), to wit, BABULAL used and transferred the means of identification of other persons during and in relation to her scheme and conspiracy to commit the violations charged in Counts Two and Three of this Complaint.

(Title 18, United States Code, Sections 1028A(a)(1), (c)(5), and 2.)

The bases for my knowledge and for the foregoing charges are, in part, as follows:

7. I am a Special Agent with the USPS OIG. I have been personally involved in the investigation of this matter. This affidavit is based on my personal participation in the investigation of this matter, my conversations with other law enforcement agents, witnesses, agents of company and financial institution victims, individual victims, and others, as well as my examination of documents and reports. Because this affidavit is being submitted for the limited purpose of establishing probable cause, it does not include all the facts that I have learned during the course of my investigation. Where the contents of documents and the actions, statements and conversations of others are reported herein, they are reported in substance and in part unless indicated otherwise.

8. Based on my involvement in this investigation, and as detailed below, I have learned that TAMEKA BABULAL a/k/a Tameka Williams a/k/a Sharniece Williams a/k/a Meek Williams, a United States Postal Service (“USPS”) mail carrier, engaged in a fraudulent scheme and conspiracy in which she stole mail entrusted to her by the USPS, and used credit cards, checks, and others’ identities in order to steal funds from her victims for her own personal gain and the gain of her co-conspirators.

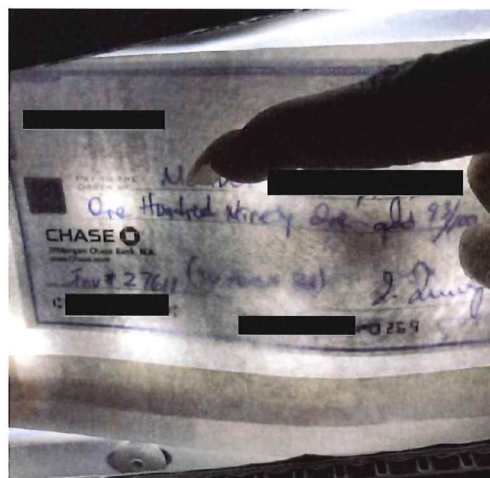
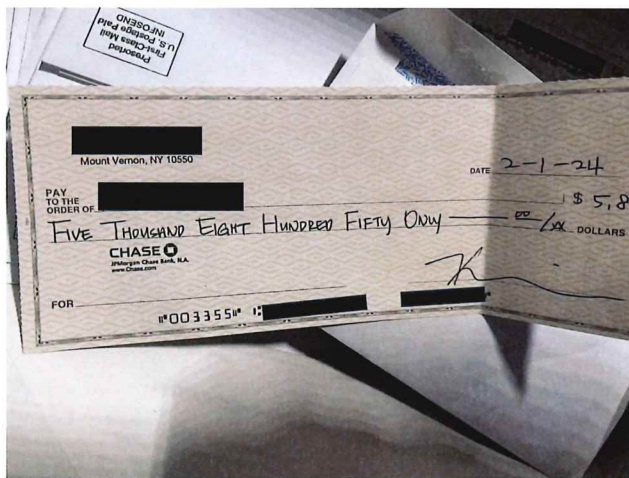
The USPS Mail Theft Scheme and Conspiracy

9. Based on my participation in this investigation, the USPS OIG is aware of numerous checks, credit cards, and identities that have been stolen from victims whose mail has gone through the USPS mail system in Mount Vernon, New York, which were then used by criminals without the victims’ authorization. For example, from May 2023 to February 2024, as much as \$800,000 in fraudulent checks have been stolen from the Mount Vernon mail system, nearly all of which these criminals then deposited into various accounts. Most of the checks were inbound to or outbound from two USPS mail routes in Mount Vernon.

10. Based on my participation in this investigation and my review of USPS records, TAMEKA BABULAL a/k/a Tameka Williams a/k/a Sharniece Williams a/k/a Meek Williams, the defendant, is a USPS employee assigned to the Mount Vernon Post Office located at 15 S 1st

Avenue, Mount Vernon, New York 10550. Rather than being assigned to one mail delivery route, TAMEKA BABULAL provides coverage for multiple routes when the regular carrier for a given route is not working, including for the routes indicated above from which as much as \$800,000 in checks has been stolen. In such situations, TAMEKA BABULAL may be the only mail carrier working a particular mail route, or may be one of several. During this investigation, law enforcement obtained photographs, communications, and other electronic documents pursuant to a search warrant for the cloud storage account connected with a phone number registered to TAMEKA BABULAL and listed in her USPS personnel file (the “Stored Communications Act Warrant” or “SCA Warrant”), among other information.

11. As detailed below, TAMEKA BABULAL a/k/a Tameka Williams a/k/a Sharniece Williams a/k/a Meek Williams, the defendant, did not perform the role entrusted to her and, instead, used her position of trust to steal mail containing, among other things, checks, credit cards, and personal identifying information to carry out a fraud scheme for the benefit of herself and her co-conspirators. For example, based on photographs obtained pursuant to the SCA Warrant, TAMEKA BABULAL’s account contained several photographs of checks that were stolen from the mail, including one showing a check dated February 1, 2024, for \$5,850 issued by a business in Mount Vernon, New York, an open envelope, and other mails transmitted through USPS. Based on my conversation with a representative of the victim business, the check was issued as a rent payment for the victim business; however, the check never reached its intended recipient. Another image appears to show how TAMEKA BABULAL identified what mail items to open and plunder, that is, by holding unopened mail against a light. Based on my training and experience, it is common for criminals engaged in mail-related fraud schemes to take pictures of stolen checks and credit cards and then send them to other co-conspirators to see whether any co-conspirators would be willing to buy the check for a price. These two images, which are partially redacted, are below:



TAMEKA BABULAL’s Check Fraud

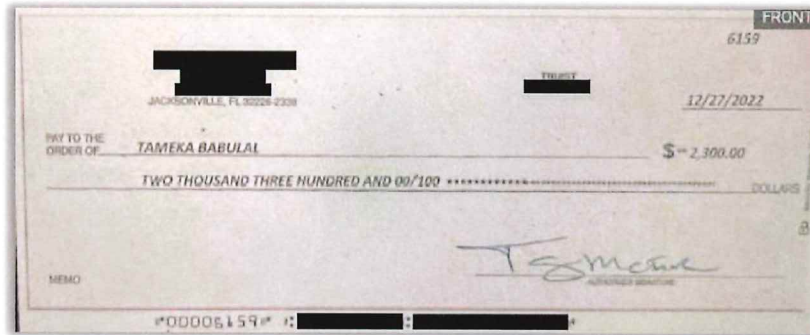
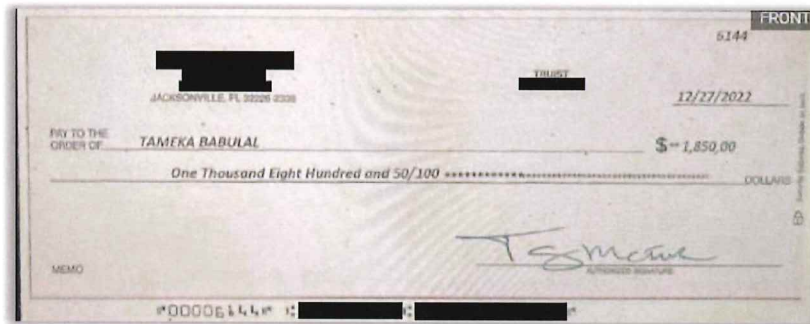
12. Based on my participation in this investigation, my review of reports and records, my discussion with agents of financial institution victims, and my training and experience, I have learned that, from as early as in or about December 2022, TAMEKA BABULAL a/k/a Tameka Williams a/k/a Sharniece Williams a/k/a Meek Williams, the defendant, engaged in check fraud

through depositing checks into her personal bank accounts, including checks held by victims with accounts at Truist Bank and Regions Bank, each of which is insured by the Federal Deposit Insurance Corporation. Specifically:

a. Based on my review of documents received from Jovia Financial Credit Union (“Jovia”) pursuant to a subpoena, as well email communications received pursuant to the SCA Warrant, and my conversations with Jovia representatives:

i. On or about December 27, 2022, two checks issued by a company in Jacksonville, Florida, totaling \$4,150 and made payable to “Tameka Babulal” were mobile deposited into a Jovia account in TAMEKA BABULAL’s name.

ii. On or about December 28, 2022, the checks were successfully deposited into TAMEKA BABULAL’s Jovia account. However, that same day, Jovia contacted TAMEKA BABULAL by email, at the email address connected with her phone and which is listed in her USPS personnel file, informing TAMEKA BABULAL that her Jovia account was locked due to the checks. The bank representative asked, “Can you please tell us where you got this check and what was it for?” and included images of the two checks, which are partially redacted and shown below:



iii. That same day, TAMEKA BABULAL responded, falsely claiming that she received the checks from the victim company for a legitimate purpose. Based on my review of USPS time and attendance records, TAMEKA BABULAL was working a shift to deliver mail in Mount Vernon, New York, at the time of this electronic communication to Jovia:

Re: Your Jovia Account Sent: Wed 12/28/2022 8:57:17 PM (UTC)

From: Meek Williams [meek2888@icloud.com]
To: Fraud Mailbox [Fraud@jovia.org]

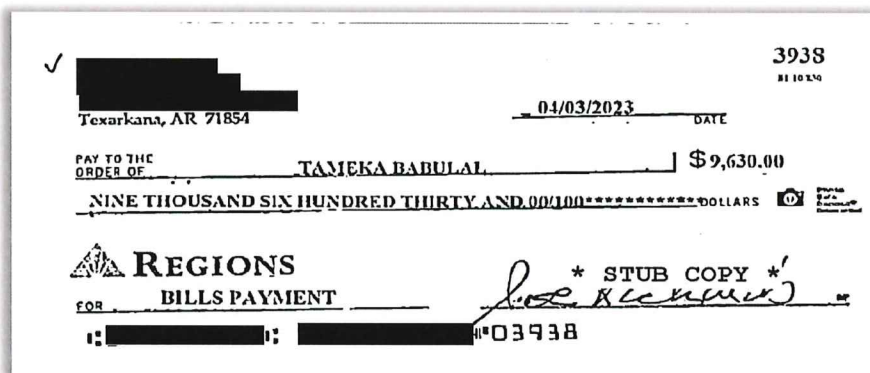
I received this check from [REDACTED] Incorporated Company and it is a long term monthly payment that I have been waiting for for the past 2 years it was sent to me through PDF
Sent from my iPhone

iv. Jovia then contacted the payor listed on the check, who verified that the checks deposited into TAMEKA BABULAL's Jovia account were fraudulent.

b. Additionally, based on my review of TD Ameritrade account records received in response to a subpoena:

i. On or about January 5, 2023, TAMEKA BABULAL opened a TD Ameritrade account in her name. The account had no activity until on or about April 3, 2023.

ii. On or about April 3, 2023, a \$9,360 check made payable to "Tameka Babulal" was mobile deposited into TAMEKA BABULAL's TD Ameritrade account. A partially redacted image of the check is below:



iii. On or about April 10, 2023, a transfer for the check amount was initiated from TAMEKA BABULAL's TD Ameritrade account to a JP Morgan Chase account in TAMEKA BABULAL's name, but TD Ameritrade did not allow the transaction. On or around that same day, TD Ameritrade records show that "Tameka Babulal," using a phone number registered to TAMEKA BABULAL and which is listed in her USPS personnel file, contacted TD Ameritrade about the account. Based on my review of USPS time and attendance records, TAMEKA BABULAL was working a shift to deliver mail in Mount Vernon, New York, at the time of this telephonic communication to TD Ameritrade. TD Ameritrade then closed the account for fraud.

iv. Based on my conversations with one of payors listed on the check, the payor mailed the check from Arkansas to a cemetery in Texas, and he did not recognize the name "Babulal."

TAMEKA BABULAL's Credit Card Theft and Fraud

13. Based on my participation in this investigation, my review of reports and records, my discussion with victims, and my training and experience, I have learned that, from at least in or about July 2023 to at least in or about October 2023, TAMEKA BABULAL a/k/a Tameka Williams a/k/a Sharniece Williams a/k/a Meek Williams, the defendant, stole mail containing credit cards she was entrusted to deliver and then tried to use those credit cards for her own personal gain and the gain of her co-conspirators.

14. For example, and based on my review of Cash App account records received in response to a subpoena for accounts held in TAMEKA BABULAL a/k/a Tameka Williams a/k/a Sharniece Williams a/k/a Meek Williams', the defendant's, name and in the name of her husband JOEL BABULAL a/k/a Joel Nical Babulal, the defendant, both accounts for which TAMEKA BABULAL and JOEL BABULAL's home address is associated, as well as based on additional documents discussed below, I have learned:

a. On or about July 28, 2023, there was an attempt to add an American Express card ending in 91009 as a payment source to JOEL BABULAL's Cash App account. Cash App prevented the card from being added to the account due to a card verification error. Based on my review of records obtained from American Express, the 91009 card is in the name of an individual who resides on USPS Route 51 in Mount Vernon, New York, and the card was projected to be delivered on July 18, 2023. Based on my review of USPS records, TAMEKA BABULAL was the only USPS mail carrier assigned to USPS Route 51 on the projected delivery date.

b. On or about July 28, 2023, an American Express card ending in 41006 was added as a payment source to JOEL BABULAL's Cash App account. On the same date, an attempt was made to use the 41006 card to transfer approximately \$2,000 from the account to a Cash App account in the name of a third-party individual. Cash App prevented the transaction from being made. Based on my review of records obtained from American Express, the 41006 card is in the name of an individual who resides on USPS Route 55 in Mount Vernon, New York, and the card was projected to be delivered on July 18, 2023. Based on my review of USPS records, TAMEKA BABULAL was assigned to USPS Route 55 on the projected delivery date. Additionally, based on documents received from American Express, following the projected July 18, 2023, delivery date for the 41006 card, an attempted transaction for \$100 was unsuccessfully made at a Royal Petroleum gas station using the card's physical chip card (*i.e.*, in person).

c. On or about August 7, 2023, at around 5:06:50 P.M. (EDT), attempts were made to use an American Express card ending in 33043 to transfer a total of approximately \$1,800 from TAMEKA BABULAL's Cash App account to JOEL BABULAL's Cash App account. Based on my review of USPS time and attendance records, TAMEKA BABULAL was working a shift to deliver mail in Mount Vernon, New York, at the time of this attempted transaction. However, Cash App prevented the payments from being made. Records from American Express show that the 33043 card is in the name of an individual who resides on USPS Route 51 in Mount Vernon, New York, and the card was projected to be delivered on July 18, 2023. Based on my review of USPS records, TAMEKA BABULAL was the only USPS mail carrier assigned to USPS Route 51

on the projected delivery date. Additionally, based on documents received from American Express, transactions on the 33043 card include the following attempted transactions:

i. Approximately \$3,656 in total attempted transactions from July 29 to October 23, 2023, including at gas stations, online for MTA e-tickets, and other vendors, of which approximately \$609 in transactions were successfully processed on the 33043 card. Several of these transactions were made using the 33043 card's physical chip card (*i.e.*, in person) at various vendors;

ii. Two attempted transactions at two delis—one in Mount Vernon, New York (where TAMEKA BABULAL works), and the other in Hempstead, New York (where TAMEKA BABULAL and JOEL BABULAL live), which based on my review of bank statements obtained from JP Morgan Chase Bank for TAMEKA BABULAL's checking account, are delis that TAMEKA BABULAL has purchased from several times before;

iii. Four attempted transactions in the amount of \$66 each at Cellpay, which, based on my training and experience, is a service that allows users to add minutes to a prepaid mobile device. American Express records show that the customer email address for these transactions is the same email address on file for TAMEKA BABULAL in USPS personnel records and which is associated with TAMEKA BABULAL's cell phone; and

iv. Twenty-seven attempted transactions at peoplesearchusa.org, which, based on my training and experience, is a background check service that advertises the ability to search over 12 billion public records from thousands of sources to provide detailed background information on individuals. American Express records show that the customer email address for some of these attempted transactions is the same email address used by TAMEKA BABULAL and her co-conspirators to apply for an American Express credit card in Individual Victim-3's name (discussed below at ¶ 29).

d. On or about August 13, 2023, an American Express card ending in 11777 was added as a payment source to TAMEKA BABULAL's Cash App account. Cash App prevented the 11777 card from being added to the account. Records from American Express show that the 11777 card is in the name of an individual who resides on USPS Route 36 in Mount Vernon, New York, and the card was projected to be delivered on August 12, 2023. Based on my review of USPS records, TAMEKA BABULAL was the only USPS mail carrier assigned to USPS Route 36 on the projected delivery date. Additionally, based on documents received from American Express:

i. On or about August 17, 2023, T-Mobile IP address 172.58.190.156 was used during an attempted online purchase at Foot Locker for \$464.90 using the 11777 card, which, based on records received from Cash App, is same IP address used on the same day to log into TAMEKA BABULAL's Cash App account.

ii. The customer email address listed for this attempted Foot Locker transaction is the same email address used by TAMEKA BABULAL and her co-conspirators to

apply for an American Express credit card in Individual Victim-3's name (discussed below at ¶ 29).

e. On or about August 21, 2023, there was an attempt to add an American Express card ending in 61013 a payment source to TAMEKA BABULAL's Cash App account. Cash App prevented the 61013 card from being added to the account. Based on my review of records obtained from American Express, the 61013 card is in the name of an individual who resides on USPS Route 30 in Mount Vernon, New York, and the card was projected to be delivered on August 14, 2023. Based on my review of USPS records, TAMEKA BABULAL was assigned to USPS Route 30 on the projected delivery date. Additionally, based on documents received from American Express, on or about August 20, 2023, an attempted transaction for approximately \$111.56 was unsuccessfully made at a Bath & Body Works store using the card's physical chip card (*i.e.*, in person).

f. On or about September 4, 2023:

i. An attempt was made to use an American Express card ending in 92015 to transfer approximately \$500 from TAMEKA BABULAL's Cash App account to JOEL BABULAL's Cash App account. Cash App prevented the transaction from being made. Based on my review of records obtained from American Express, the 92015 card is in the name of an individual who resides on USPS Route 21 in Mount Vernon, New York, and the card was projected to be delivered on August 31, 2023. Based on my review of USPS records, TAMEKA BABULAL was assigned to USPS Route 21 on the projected delivery date.

ii. An attempt was made to use an American Express card ending in 82000 to transfer approximately \$1,500 from TAMEKA BABULAL's Cash App account to JOEL BABULAL's Cash App account. Cash App prevented the payment from being made. Based on my review of records obtained from American Express, the 82000 card is in the name of an individual who resides on USPS Route 22 in Mount Vernon, New York, and the card was projected to be delivered on August 29, 2023. Based on my review of USPS records, TAMEKA BABULAL was assigned to USPS Route 22 on the projected delivery date.

iii. An attempt was made to use an American Express card ending in 74003 to transfer approximately \$500 from TAMEKA BABULAL's Cash App account to JOEL BABULAL's Cash App account. Cash App prevented the payment from being made. Based on my review of records obtained from American Express, the 74003 card is in the name of an individual who resides on USPS Route 21 in Mount Vernon, New York, and the card was projected to be delivered on August 31, 2023. Based on my review of USPS records, TAMEKA BABULAL was assigned to USPS Route 21 on the projected delivery date.

g. On or about September 12, 2023, based on documents received from American Express, two separate transactions for \$175 were unsuccessfully made at a Sunoco gas station using the 74003 card's and the 92015 card's physical chip cards (*i.e.*, in person). Based on my training and experience, it is common for gas stations to put a hold for a fixed sum on a credit card account before allowing the customer to pump gas into their car at the pump. These transactions were attempted at 7:36:23 A.M. (EDT) (on the 74003 card) and 7:36:46 A.M. (EDT)

(on the 92015 card), suggesting that the same person possessed and attempted to use both cards in connection with the attempted Sunoco transactions. At 7:37:38 A.M. (EDT), based on documents received from Cash App pursuant to a subpoena, a transaction was successfully made from TAMEKA BABULAL's Cash App account at a Sunoco gas station.

h. On or about October 1, 2023, an American Express card ending in 92008 was added as a payment source to TAMEKA BABULAL's Cash App account. Cash App prevented the 92008 card from being added to the account. Based on my review of records obtained from American Express, the 92008 card is in the name of an individual who resides on USPS Route 69 in Mount Vernon, New York, and the card was projected to be delivered on September 28, 2023. Based on my review of USPS records, TAMEKA BABULAL was the only USPS mail carrier assigned to USPS Route 69 on the projected delivery date.

TAMEKA BABULAL's Identity Theft

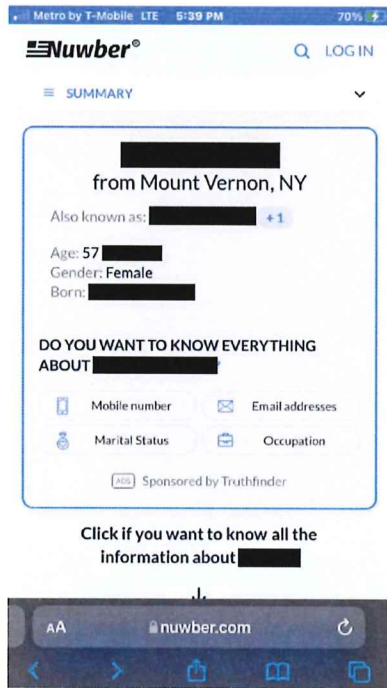
15. TAMEKA BABULAL a/k/a Tameka Williams a/k/a Sharniece Williams a/k/a Meek Williams, the defendant, targeted victims on her mail route, stole their personal identifying information, and then, herself and with the help of her co-conspirators, stole their identities to open financial accounts in their names.

Individual Victim-1

16. As discussed below, TAMEKA BABULAL a/k/a Tameka Williams a/k/a Sharniece Williams a/k/a Meek Williams, the defendant, stole mail containing a credit card destined for an individual who resides on USPS Route 18 in Mount Vernon, New York ("Individual Victim-1"), obtained Individual Victim-1's means of identification, including through a co-conspirator, and then tried to open fraudulent accounts in Individual-Victim-1's name. Based on my conversations with Individual Victim-1, I know that she is a real person.

17. On or about September 8, 2023, based on my review of Cash App account records received in response to a subpoena, at around 5:42:23 P.M. (EDT), an attempt was made to use an American Express card ending in 51001 to transfer approximately \$3,500 from TAMEKA BABULAL a/k/a Tameka Williams a/k/a Sharniece Williams a/k/a Meek Williams', the defendant's, Cash App account to JOEL BABULAL a/k/a Joel Nical Babulal's Cash App account. Based on my review of USPS time and attendance records, TAMEKA BABULAL was working a shift to deliver mail in Mount Vernon, New York, at the time of this attempted transaction. However, Cash App prevented the payment from being made. Based on my review of records obtained from American Express, the 51001 card is in the name of Individual Victim-1, and the card was projected to be delivered on September 8, 2023. Based on my review of USPS records, TAMEKA BABULAL was the only USPS mail carrier assigned to Individual Victim-1's USPS Route on the projected delivery date. Additionally, American Express records show that the 51001 card was activated on or about September 8, 2023, and T-Mobile IP address 172.58.237.253 was used during the activation. Records from Cash App show that the same IP address was used on the same day to log into TAMEKA BABULAL's Cash App account.

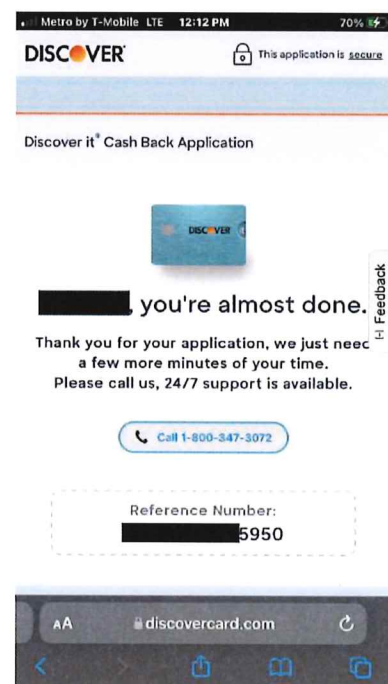
18. Based on my review of photographs obtained pursuant to the SCA Warrant, I have learned, with respect to TAMEKA BABULAL a/k/a Tameka Williams a/k/a Sharniece Williams a/k/a Meek Williams', the defendant's, phone, that: On or about September 8, 2023, TAMEKA BABULAL saved screenshots to her phone from websites appearing to obtain detailed background check information about Individual Victim-1. On or about September 10, 2023, TAMEKA BABULAL saved a screenshot to her phone of a message exchange between the sender and a co-conspirator ("Co-Conspirator-1" or "CC-1"), showing a confirmation of a cryptocurrency transaction and the personal identifying information relating to Individual Victim-1, including her date of birth, social security number, address, and other possible names. On or about September 13, 2023, TAMEKA BABULAL saved a screenshot of a Discover Card application for someone with the same first name as Individual Victim-1. These images are shown below:



September 8, 2023



September 10, 2023



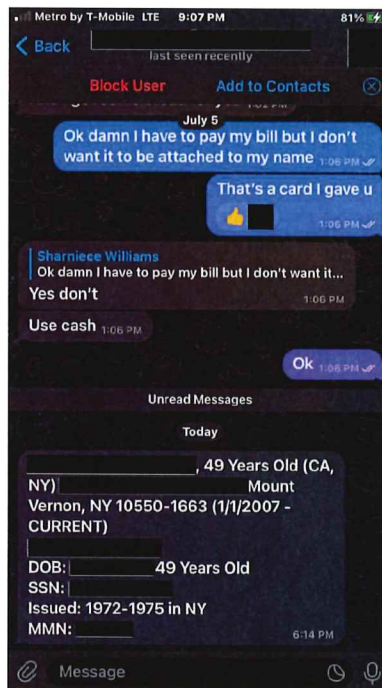
September 13, 2023

19. Additionally, on or about September 13, 2023, based on documents received from Discover Financial Services pursuant to a subpoena, an account was opened in Individual Victim-1's name, with the same application Reference Number as the one depicted above from TAMEKA BABULAL a/k/a Tameka Williams a/k/a Sharniece Williams a/k/a Meek Williams, the defendant's phone. The IP address used was 172.58.229.60. Based on records received from Cash App pursuant to a subpoena, the same IP address was used, on or about September 13, 2023, to log into TAMEKA BABULAL's Cash App account. Moreover, based on my review of subscriber information received from Apple Inc. pursuant to a subpoena, the email address used for the Discover Card application is linked to JOEL BABULAL a/k/a Joel Nical Babulal's, the defendant's, Apple account (the subscriber name for which is listed as "Rich Life").

Individual Victim-2

20. As discussed below, TAMEKA BABULAL a/k/a Tameka Williams a/k/a Sharniece Williams a/k/a Meek Williams, the defendant, obtained, through a co-conspirator, the means of identification for an individual residing in Mount Vernon, New York (“Individual Victim-2”), opened up a Cash App account in Individual Victim-2’s name, tried to transfer herself money from said Cash App account, and then tried to open fraudulent bank accounts in Individual-Victim-2’s name.

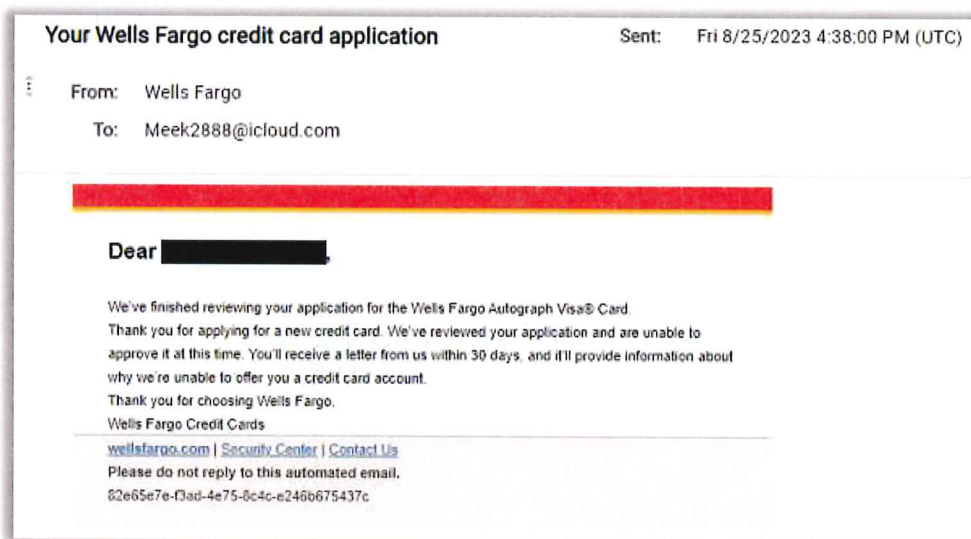
21. On or about July 6, 2023, based on my review of photographs obtained pursuant to the SCA Warrant, TAMEKA BABULAL a/k/a Tameka Williams a/k/a Sharniece Williams a/k/a Meek Williams, the defendant, received a communication containing personal identifying information relating to Individual Victim-2, including her date of birth, social security number, address, and other possible names. An image of the communication is below, which also appears to show a conversation between TAMEKA BABULAL, using the name “Sharniece Williams” (“Sharniece” is TAMEKA BABULAL’s middle name), and a co-conspirator (“Co-Conspirator-2” or “CC-2”) about how to further their fraud scheme:



22. On or about July 24, 2023, based on my review of documents obtained from Cash App pursuant to a subpoena, a Cash App account was created in Individual Victim-2’s name. The same device used to create and access the Cash App account in Individual Victim-2’s name was used to access both TAMEKA BABULAL a/k/a Tameka Williams a/k/a Sharniece Williams a/k/a Meek Williams’, the defendant’s, and JOEL BABULAL a/k/a Joel Nical Babulal’s, the defendant’s, Cash App accounts. Additionally, on two separate occasions, on or about July 30 and September 24, 2023, the same IP address was used to log into the Cash App account in Individual Victim-2’s name and TAMEKA BABULAL’s Cash App account.

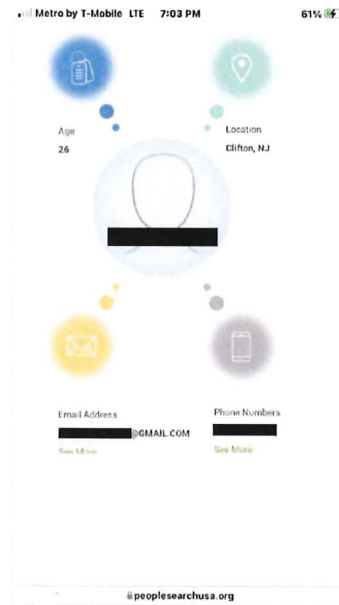
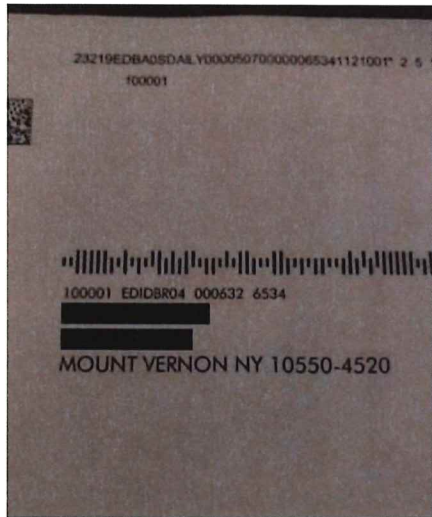
23. On or about July 26, 2023, based on my review of documents received from Cash App pursuant to a subpoena, someone using the same IP address logged into both the Cash App account in Individual Victim-2's name and the Cash App account of JOEL BABULAL a/k/a Joel Nical Babulal, the defendant. Two attempts were made to transfer approximately \$2,900 each from the Cash App account in Individual Victim-2's name to JOEL BABULAL's Cash App account.

24. On or about August 25, 2023, based on my review of emails obtained pursuant to the SCA Warrant, TAMEKA BABULAL a/k/a Tameka Williams a/k/a Sharniece Williams a/k/a Meek Williams, the defendant, submitted an application for a Wells Fargo Autograph Visa Card in Individual Victim-2's name. That same day, TAMEKA BABULAL received an email from Wells Fargo directed to Individual Victim-2 (at TAMEKA BABULAL's email address), informing her that her Wells Fargo Autograph Visa Card application was denied. A partially redacted image of Wells Fargo's card application denial is below:

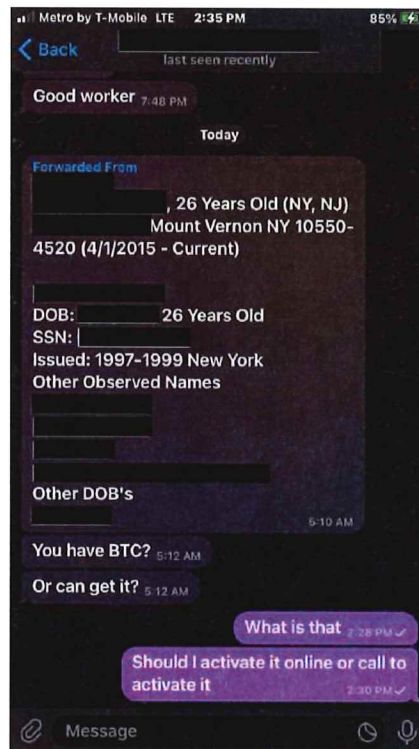


Individual Victim-3

25. On or about August 12, 2023, based on my review of photographs obtained pursuant to the SCA Warrant, TAMEKA BABULAL a/k/a Tameka Williams a/k/a Sharniece Williams a/k/a Meek Williams, the defendant, took a photo of what appears to be a piece of mail directed to an individual residing in Mount Vernon and who is located on USPS delivery route 36 ("Individual Victim-3"). Based on my conversations with Individual Victim-3, I know that she is a real person. USPS records show that TAMEKA BABULAL was assigned to route 36 on August 11 and 12, 2023. On this same day, screenshots were saved to TAMEKA BABULAL's phone showing websites appearing to obtain detailed background check information about Individual Victim-3. Images of the piece of mail and screenshot are shown below:



26. On or about August 13, 2023, based on my review of photographs obtained pursuant to the SCA Warrant, TAMEKA BABULAL a/k/a Tameka Williams a/k/a Sharniece Williams a/k/a Meek Williams, the defendant, saved a screenshot of a communication from CC-2 containing personal identifying information relating to Individual Victim-3, including her date of birth, social security number, address, and other possible names. An image of the chat is below:



27. On or about August 13, 2023, based on documents received from Discover Financial Services, TAMEKA BABULAL's phone number was used to activate a Discover Card credit card ending in 7588 in the name of Individual Victim-3. Based on my subsequent interview with Individual Victim-3, she told me she was expecting to receive a new credit card in the mail from Discover at some point after August 10, 2023. However, the victim did not receive the card and, at some point between August 10 and 15, 2023, when TAMEKA BABULAL was assigned to Individual Victim-3's USPS route on several days, the victim received a call from Discover about suspicious transactions.

28. Based on information received from Discover Financial Services, from on or about August 13 through 21, 2023, approximately \$17,875.95 in attempted transactions were made on the 7588 card. Those transactions include:

a. On or about August 13, 2023, based on documents received from Cash App pursuant to a subpoena, an attempt was made to use the 7588 card to transfer approximately \$3,000 from TAMEKA BABULAL a/k/a Tameka Williams a/k/a Sharniece Williams a/k/a Meek Williams', the defendant's, Cash App account to JOEL BABULAL a/k/a Joel Nical Babulal's, the defendant's, Cash App account. Information obtained from Discover shows that Discover approved this transaction; however, records obtained from Cash App show that Cash App ultimately did not allow this transaction to close.

b. On or about August 15, 2023, based on information obtained from Discover Financial Services, a \$5,116.22 attempted transaction was made at Oscar Stone NYC, a jewelry store based in Bronx, New York, at around 2:39 P.M. (EDT). Around the time of this attempted transaction (i) based on photographs obtained pursuant to the SCA Warrant, TAMEKA BABULAL saved a screenshot from Oscar Stone NYC's website; and (ii) based on call detail records obtained from T-Mobile for TAMEKA BABULAL's phone number, three calls were made to Discover, and one call was made to Oscar Stone NYC.

29. On or about August 16, 2023, records obtained from American Express pursuant to a subpoena show that an attempt was made to open an American Express credit card using the name and identity of Individual Victim-3. Based on additional records obtained during this investigation, I have learned, with respect to this American Express credit card application, that:

a. Based on documents received from American Express and Google LLC pursuant to a subpoena, and also pursuant the SCA Warrant, the email address used in connection with the American Express account application is a Google email address that was created on or about July 28, 2023. The same IP address used to access the Google email account on that date was also used to log into the Apple account associated with TAMEKA BABULAL a/k/a Tameka Williams a/k/a Sharniece Williams a/k/a Meek Williams', the defendant's, phone.

b. Based on documents received from American Express, Cash App, and T-Mobile pursuant to subpoenas, the phone number used in connection with the American Express credit card application is the same phone number associated with the Cash App account created in Individual Victim-2's name on or about July 24, 2023 (discussed above at ¶ 22). T-Mobile subscriber information shows no subscriber name for this phone number but lists the number being

associated with a TracFone Wireless device, which, based on my training and experience, is a prepaid, no-contract mobile phone provider. Moreover, call detail records from March 2023 to November 2023 show (i) over a hundred communications between this phone number and TAMEKA BABULAL's phone number; and (ii) over a hundred communications between this phone number and a phone number associated with JOEL BABULAL's Cash App account. As noted below, the phone associated with this phone number was recovered by law enforcement on or about May 23, 2024, at TAMEKA BABULAL and JOEL BABULAL's residence, located in Nassau County, New York.

30. On or about May 23, 2024, law enforcement executed a search warrant at the residence of TAMEKA BABULAL a/k/a Tameka Williams a/k/a Sharniece Williams a/k/a Meek Williams and JOEL BABULAL a/k/a Joel Nical Babulal, the defendants. Based on my participation in the execution of the search warrant and my conversations with other law enforcement officers conducting the search, I have learned the following, in substance and in part:

a. TAMEKA BABULAL and JOEL BABULAL were each present at the residence. The residence had a first floor, second floor, and basement. On the first floor, there was a living room that did not have any seating in it, a bedroom that appeared to be used for storage, and a shared bedroom. When law enforcement arrived, I observed JOEL BABULAL exit the shared bedroom. On the second floor, there was one room that appeared to be used for storage, as well as a second room that had a bed and television in it.

b. In the bedroom shared by TAMEKA BABULAL and JOEL BABULAL law enforcement recovered items, including the following:

i. At least approximately two dozen credit cards and mail items from different financial institutions, including American Express, Capital One, and Discover, in the names of people other than the defendants. Those names include the individuals identified as Individual Victim-1, Individual Victim-2, and Individual Victim-3.

ii. Dozens of checks made out to individuals other than TAMEKA BABULAL or JOEL BABULAL and which were not issued by either of them. Those checks included several checks that appear to have been washed. Based on my training and experience, individuals who commit check fraud will sometime "wash" the check, thereby removing the ink on the check, so that the payee can be changed to themselves or co-conspirators.

iii. At least two social security cards in the names of people other than TAMEKA BABULAL or JOEL BABULAL.

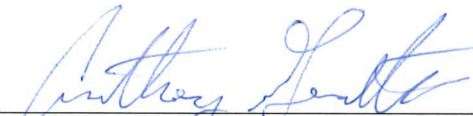
iv. At least four bundles of mail items that were deliverable to individuals in Mount Vernon, New York, where TAMEKA BABULAL was assigned to deliver USPS mail.

v. A W-2 tax document in the name of someone other than TAMEKA BABULAL or JOEL BABULAL and which was sent by an employer in Mount Vernon, New York, where TAMEKA BABULAL was assigned to deliver USPS mail.


vi. Approximately 17 phones, including several of the phones referenced above and which were used in connection with TAMEKA BABULAL's Cash App account, JOEL BABULAL's Cash App account, the Discover credit card application in Individual Victim-1's name, the Discover credit card activation in Individual Victim-3's name, and the American Express credit card application in Individual Victim-3's name.

c. As law enforcement executed the search warrant, TAMEKA BABULAL made certain statements after being advised of her *Miranda* and *Garrity* rights, including identifying one of the phone numbers referenced above as belonging to JOEL BABULAL. Notably, based on my review of USPS records, TAMEKA BABULAL identified this phone number in her USPS employment application as belonging to a former supervisor. Additionally, law enforcement called one of the numbers referenced above and used in the fraud scheme, and a cell phone that JOEL BABULAL identified as his cell phone rang in the residence.

WHEREFORE, I respectfully request that a warrant be issued for the arrest of TAMEKA BABULAL a/k/a Tameka Williams a/k/a Sharniece Williams a/k/a Meek Williams and JOEL BABULAL a/k/a Joel Nical Babulal, the defendants, and that they be arrested, and imprisoned or bailed, as the case may be.


ANTHONY GIATTINO
Special Agent
United States Postal Service,
Office of the Inspector General

Sworn to before me this
23 day of May, 2024


THE HONORABLE JUDITH C. McCARTHY
UNITED STATES MAGISTRATE JUDGE
SOUTHERN DISTRICT OF NEW YORK