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

UNITED STATES OF AMERICA :
 : Hon. Michael A. Hammer
 :
 v. : Mag. No. 24-10022
 :
 CHOUBY CHARLERON : **CRIMINAL COMPLAINT**
 :
 : **FILED UNDER SEAL**

I, Brian Macdonald, 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 an 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.

/s/ Brian Macdonald
Brian Macdonald
Postal Inspector
U.S. Postal Inspection Service

Postal Inspector Macdonald attested to this Complaint by telephone pursuant to F.R.C.P. 4.1(B)(2)(A) on this 19th day of January, 2024.

HONORABLE MICHAEL A. HAMMER
UNITED STATES MAGISTRATE JUDGE

/s/ Hon. Michael A. Hammer
Signature of Judicial Officer

ATTACHMENT A
(Wire Fraud Conspiracy)

From in or around February 2020 to on or about May 5, 2023, in the District of New Jersey and elsewhere, the defendant,

CHOUBY CHARLERON,

did knowingly and intentionally conspire with others to knowingly and intentionally devise and intend to devise a scheme and artifice to defraud and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, and, for the purpose of executing and attempting to execute such scheme and artifice, did knowingly transmit and cause to be transmitted by means of wire, radio, and television communication in interstate and foreign commerce, the following writings, signs, signals, pictures, and sounds, contrary to Title 18, United States Code, Section 1343.

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

ATTACHMENT B

I, Brian Macdonald, am a Postal Inspector with the United States Postal Inspector Service. The information contained in the Complaint is based upon my personal knowledge, as well as information obtained from other sources, including: (a) statements made or reported by various witnesses with knowledge of relevant facts; (b) my review of publicly available information; and (c) my review of evidence, including bank records, IP address information, and other documents. Because this Complaint is being submitted for a limited purpose, I have not set forth every fact that I know concerning this investigation. Where the contents of documents and the actions and statements of others are reported, they are reported in substance and in part, except where otherwise indicated. Where I assert that an event took place on a particular date, I am asserting that it took place on or about the date alleged.

Overview

1. The defendant, Chouby Charleron (“CHARLERON”), accessed and obtained the personal identifying information (“PII”) of unwitting individuals (“victims”) and then sold that PII to a network of co-conspirators whom he knew would thereafter use the PII to, among other things, activate credit cards issued in the names of those victims and fraudulently use those credit cards. CHARLERON sent the PII to his co-conspirators through interstate wires using a web-based encrypted messaging application (the “Application”). The investigation has further shown that at least one of those co-conspirators (“Co-Conspirator 1”) thereafter used the PII purchased from CHARLERON to activate credit cards in the names of multiple victims that Co-Conspirator 1 then used to make unauthorized purchases that resulted in a loss to multiple financial institutions of approximately \$90,030.

The Scheme

2. From in or round February 2020 through on or about May 5, 2023, CHARLERON, using “The Real Jwet King” as his username over the Application, sold the PII, including social security numbers, of approximately 5,050 victims, including at least one victim in the District of New Jersey, to approximately 18 different co-conspirators, including at least one who operated in the District of New Jersey. Specifically, CHARLERON was the administrator of a chat group on the Application called “TLO LOOK UPS,” which had as many as 799 members.¹

3. As part of the scheme, a co-conspirator would send CHARLERON the name and address of a potential victim using the Application. The co-conspirator would then send CHARLERON approximately \$25 in Bitcoin or currency by using a

¹ Based on my training and experience, I know that TLO is a database that can be accessed to look up PII.

mobile payment application. Once CHARLERON received the payment, he would provide the requested PII to the co-conspirator over the Application.

4. For example, on or about March 9, 2022, Co-Conspirator 1 sent CHARLERON a list of five names and addresses via the Application. On or about March 10, 2022, Co-Conspirator 1 sent CHARLERON a message confirming that Co-Conspirator 1 had made a payment via Bitcoin to CHARLERON in the amount of \$119.64. Approximately three minutes later, CHARLERON sent Co-Conspirator 1 the PII for the five names that Co-Conspirator 1 had requested the previous day. That PII included the individuals' dates of birth, social security numbers, and phone numbers. Co-Conspirator 1 then used and attempted to use the PII to activate credit cards in the name of those five victims. For at least one of those victims, Co-Conspirator 1 successfully activated the victim's credit card by using the PII to pose as the victim during a telephone call with the victim's bank. After activating the credit card, Co-Conspirator 1 then made unauthorized charges on that credit card at various retail locations in New Jersey.

5. Based on a review of financial and other relevant records, from approximately on or about July 14, 2021 through on or about May 9, 2022, Co-Conspirator 1 activated and used the credit cards of multiple victims to make approximately \$90,030 in unauthorized charges. The investigation has shown that Co-Conspirator 1 purchased the PII of at least 80 of those victims from CHARLERON, with CHARLERON sending that PII to Co-Conspirator 1 over the Application.

6. CHARLERON communicated with his co-conspirators in a chat group on the Application called "TLO LOOK UPS" and offered discounts to those purchasing PII in larger quantities. For example, on or about August 24, 2022, CHARLERON sent a message to the members of the chat group about a "Bulk Deal" pursuant to which CHARLERON offered "3 for 100 TLO REPORT DL# INCLUDED" meaning the PII of three individuals in exchange for \$100. This price was higher than the \$25 that CHARLERON normally charged because it included the "DL," or driver's license number of the victim. Approximately one week later, on or about September 1, 2022, CHARLERON offered a "HAPPY HOUR" deal to the chat group, which included "\$20 LOOK UPS DL NOT INCLUDED. . . ."

7. CHARLERON sold PII with the knowledge that his co-conspirators thereafter used and attempted to use the PII to defraud and attempt to defraud the victims associated with that PII and financial institutions used by those victims. For example, on or about June 29, 2020, Co-Conspirator 1 sent a request for an intended victim's PII to CHARLERON over the Application. Included in the request was a photograph of an envelope addressed to Co-Conspirator 1's intended victim, sent by a financial institution. The envelope appears to alert the victim that their credit card had arrived. Based on my training and experience and the investigation to date, I

believe that Co-Conspirator 1 was asking CHARLERON for the PII of someone whose financial institution had just sent a yet-to-be-activated credit card.

8. On or about July 29, 2020, Co-Conspirator 1 requested PII from CHARLERON for an intended victim from Clifton, New Jersey. Co-Conspirator 1 again sent a photograph of an envelope addressed to that intended victim, which pertained to a yet-to-be-activated credit card. Less than an hour later, CHARLERON sent Co-Conspirator 1 the PII of this individual.

9. On or about November 26, 2022, an individual (“Co-Conspirator 2”) purchased the PII of two victims from CHARLERON for approximately \$75. After making the payment to CHARLERON, Co-Conspirator 2 urged CHARLERON to provide the PII quickly, explaining that “[b]anks close in 28 min.” CHARLERON sent the PII to Co-Conspirator 2 approximately 21 minutes later.

10. A review of records associated with searches for PII done by CHARLERON on behalf of his co-conspirators came back to IP addresses associated with CHARLERON’s residences in Baltimore and Laurel, Maryland.