2026R00624/MKO

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA	:	Hon. Susan D. Wigenton, U.S.D.J.
	:	
	:	Criminal No. 26-481
v.	:	
	:	18 U.S.C. § 1349
	:	18 U.S.C. § 1344
AQUIL HUBBARD,	:	18 U.S.C. § 2
a/k/a "Dashawn Smith"	:	

I N F O R M A T I O N

The defendant having waived in open court prosecution by Indictment, the United States charges:

COUNT 1

(Conspiracy to Commit Bank Fraud)

Background

1. At times material to this Information:

a. Defendant Aquil Hubbard ("HUBBARD") was a resident of Middlesex, New Jersey and Newark, New Jersey, and was known as "Dashawn Smith."

b. Co-Conspirator 1 ("CC-1") was a resident of Irvington, New Jersey and Rahway, New Jersey.

c. Co-Conspirator 2 ("CC-2") was a resident of Union, New Jersey.

d. Co-Conspirator 3 ("CC-3") was a resident of Newark, New Jersey.

e. The victim financial institutions, including Bank 1 and Bank 2, were "financial institutions" whose deposits were insured by the Federal Deposit Insurance Corporation.

2. From in or about December 2024 to in or about January 2026, in Essex, Morris, and Passaic Counties, in the District of New Jersey and elsewhere, defendant

AQUIL HUBBARD,
a/k/a "Dashawn Smith,"

did knowingly and intentionally conspire and agree with CC-1, CC-2, CC-3, and others (collectively, the "Co-Conspirators") to execute a scheme and artifice to defraud financial institutions, as defined in Title 18, United States Code, Section 20, whose deposits were insured by the Federal Deposit Insurance Corporation, to obtain monies, 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 HUBBARD and the Co-Conspirators to enrich themselves by stealing checks and debit and credit cards from the United States Postal Service ("USPS"), altering and forging stolen checks, fraudulently obtaining money from victim financial institutions by, among other things, cashing and/or depositing altered and forged checks into bank accounts at various victim financial institutions and withdrawing funds from those accounts before the victim financial institutions identified the fraudulent checks and blocked further withdrawals.

Manner and Means of the Conspiracy

4. It was part of the conspiracy that:

a. HUBBARD, CC-1, and CC-2 stole mail from USPS collection boxes in Parsippany, New Jersey, and USPS vehicles in northern New Jersey to obtain mail that contained checks, credit and debit cards, gift cards, and other items of potential monetary value.

b. To access the USPS collection boxes, HUBBARD, CC-1, and CC-2 used stolen or misappropriated USPS keys known as arrow keys, which generally were assigned to mail carriers for use on delivery and collection routes.

c. To access USPS vehicles, HUBBARD, CC-1, and CC-2 would burglarize the vehicles either by breaking the vehicle's window or opening an unlocked vehicle door or window and remove mail from the vehicle.

d. After stealing mail from USPS vehicles and collection boxes, HUBBARD, CC-1, and CC-2 would sort through the stolen mail to locate checks (the "Stolen Checks") and credit and debit cards.

e. HUBBARD, CC-1, and CC-2 would then use social media to solicit individuals with existing bank accounts at financial institutions, or who could open a bank account at a financial institution (the "Complicit Accountholders"), with the goal to have Complicit Accountholders cash or deposit the Stolen Checks.

f. HUBBARD, CC-1, and CC-2 offered to pay the Complicit Accountholders cash or controlled substances in exchange for the Complicit Accountholders' banking information.

g. HUBBARD and the Co-Conspirators sometimes "washed" the Stolen Checks by removing ink from the checks and altering the checks to make them payable to Complicit Accountholders and/or third-parties, including CC-3.

h. For example, on or around February 13, 2025, HUBBARD, CC-1, and CC-2, burglarized a USPS vehicle in Paterson, New Jersey and stole mail from the vehicle.

i. Then, on or around April 24, 2025, HUBBARD deposited an altered check into a Complicit Accountholder's account at an automated teller machine at a Bank 1 branch in Newark, New Jersey. The check had been altered to be made payable to the Complicit Accountholder.

j. Then, on or around April 28, 2025, HUBBARD and CC-1 unlawfully accessed the USPS collection box at the Post Office in Parsippany, New Jersey, and stole mail.

k. Hours later, HUBBARD, CC-1, and CC-3 traveled to a Bank 2 branch in East Hanover, New Jersey. CC-3 tried to negotiate an altered and forged check made payable to CC-3. Through text messages, HUBBARD instructed CC-3 on how to negotiate the altered and forged check.

5. Using the manner and means described herein, HUBBARD and the Co-Conspirators obtained and attempted to obtain thousands of dollars from the victim financial institutions.

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

COUNT 2

(Bank Fraud)

1. The allegations contained in paragraphs 1, and 3 through 5 of Count 1 of this Information are incorporated as if set forth in full herein.

2. On or about April 28, 2025, in Morris County, in the District of New Jersey, and elsewhere, defendant

AQUIL HUBBARD,
a/k/a "Dashawn Smith,"

knowingly and intentionally executed, or attempted to execute, a scheme and artifice to defraud a financial institution as defined in Title 18, United States Code, Section 20, whose deposits were insured by the Federal Deposit Insurance Corporation, and to obtain any of the monies, funds, assets, 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.

In violation of Title 18, United States Code, Section 1344 and Section 2.

FORFEITURE ALLEGATION

Upon conviction of the offenses charged in Counts 1 and 2 of this Information, defendant

AQUIL HUBBARD,
a/k/a "Dashawn Smith,"

shall forfeit to the United States, pursuant to 18 U.S.C. § 982(a)(2), and 28 U.S.C. § 2461(c), any property constituting, or derived from, proceeds the defendant obtained directly or indirectly as a result of such offenses.

SUBSTITUTE ASSETS PROVISION
(Applicable to All Forfeiture Allegations)

If any of the forfeitable 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 subdivided without difficulty,

the United States shall be entitled, pursuant to 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. § 982(b), to forfeit any other property of the defendant up to the value of the above-described forfeitable property.

ROBERT FRAZER
United States Attorney

M.K. O'Leary
Michael K. O'Leary
Assistant U.S. Attorney

Approved by:

Ronnell L. Wilson
Ronnell L. Wilson
Chief, Special Prosecutions Division

CASE NUMBER: 26-481

United States District Court
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UNITED STATES OF AMERICA

v.

AQUIL HUBBARD,
a/k/a "Dashawn Smith"

INFORMATION FOR

18 U.S.C. § 1349
18 U.S.C. § 1344
18 U.S.C. § 2

ROBERT FRAZER
UNITED STATES ATTORNEY

MICHAEL K. O'LEARY
ASSISTANT U.S. ATTORNEY
NEWARK, NEW JERSEY
973-353-6086