

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA	:	Hon.
	:	
v.	:	Criminal No.
	:	
CHRISTOPHER L. HENDERSON	:	18 U.S.C. § 1343 and § 2

INFORMATION
(Wire Fraud)

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

Background

1. At various times relevant to this Information:
 - a. Defendant CHRISTOPHER L. HENDERSON (“HENDERSON”) was a resident of Akron, Ohio;
 - b. Co-conspirator Dante G. Dixon (“Dixon”), who is not named as a defendant herein, was a resident of Akron, Ohio, and Miami, Florida;
 - c. Jet Aviation was an international business aviation services company that, among other things, provided charter flight services. Jet Aviation’s United States headquarters were located in Teterboro, New Jersey; and
 - d. Financial Institution #1 was an American multinational banking and financial services company headquartered in New York, New York.

The Fraud

2. From at least as early as in or about May 2013 through in or about June 2013, in the District of New Jersey and elsewhere, defendant

CHRISTOPHER L. HENDERSON

did knowingly and intentionally 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 such scheme and artifice, to transmit and cause to be transmitted by means of wire communications in interstate commerce certain writings, signs, signals, pictures, and sounds, as set forth below.

Object of the Fraud

3. The object of the conspiracy was for defendant HENDERSON and his co-conspirators to enrich themselves by fraudulently obtaining at least four private charter flights from Jet Aviation, as well as tens of thousands of dollars in other luxury goods and services, by posing as employees of Financial Institution #1 and fraudulently obtaining lines of credit.

Methods and Means of the Fraud

4. On or about May 5, 2013, an individual using the name "Josh Stevens" called Jet Aviation's offices in Chicago, Illinois and Van Nuys, California to inquire about Jet Aviation's private charter flight services. That individual identified himself as being employed as a senior vice president at Financial Institution #1 and provided an email address purporting to be affiliated with Financial Institution #1.

5. Thereafter, a Jet Aviation employee sent an email to the above referenced email address. The email from Jet Aviation contained a draft Charter Services Agreement (the

“Agreement”), which was signed by “Josh Stevens” and returned to Jet Aviation on or about May 9, 2013. The Agreement falsely listed “Josh Stevens” as a senior vice president, defendant HENDERSON as a vice president of international affairs, and co-conspirator Dixon as a vice president, all at Financial Institution #1.

6. On or about May 21, 2013, based on the false information provided by “Josh Stevens,” a Jet Aviation employee created an account and a \$350,000 line of credit for defendant HENDERSON and others. The line of credit was in the name of Financial Institution #1 on behalf, and for the use, of defendant HENDERSON and others. These transactions were arranged via email correspondence and phone calls, which were transmitted in interstate commerce.

7. Thereafter, defendant HENDERSON used the sham line of credit to take the following three Jet Aviation private charter flights:

a. On or about June 1, 2013, defendant HENDERSON flew from Camarillo, California to Akron, Ohio;

b. On or about June 3, 2013, defendant HENDERSON and co-conspirator Dixon flew from Akron, Ohio to Teterboro, New Jersey; and

c. On or about June 7, 2013, defendant HENDERSON and co-conspirator Dixon flew from Teterboro, New Jersey to Miami, Florida.

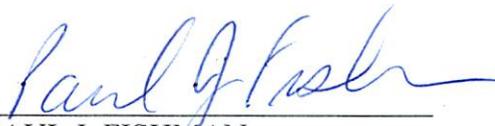
8. On or about June 7, 2013, a Jet Aviation employee at its headquarters in Teterboro, New Jersey, met defendant HENDERSON and co-conspirator Dixon before they boarded a charter flight to Miami, Florida. During the meeting, co-conspirator Dixon identified himself and defendant HENDERSON as being employees at Financial Institution #1. The Jet Aviation employee then contacted Financial Institution #1 and was informed that neither defendant HENDERSON nor co-conspirator Dixon were then, or had ever previously been, employees at Financial Institution #1.

9. As a result of this misrepresentation to Jet Aviation, defendant HENDERSON fraudulently obtained private high-end charter flights and limousine car services, with a total approximate value of \$90,000. Jet Aviation never received payment from defendant HENDERSON and others, or from Financial Institution #1's line of credit, for any of the services provided to defendant HENDERSON and others, including the approximately \$79,000 in charter flights and the approximately \$11,000 in limousine services.

10. Defendant HENDERSON and others made similar misrepresentations about their purported employment at Financial Institution #1 to other luxury service providers, causing them to issue lines of credit to defendant HENDERSON and others, which they used to purchase, among other things, approximately \$20,000 in luxury watches, sunglasses, and sterling silver and leather business card holders, and approximately \$25,500 in hotel stays at a luxury hotel in Miami, Florida.

11. As a result of the scheme and artifice to defraud, defendant HENDERSON fraudulently obtained more than \$135,000 in luxury goods and services.

In violation of Title 18, United States Code, Sections 1343 and 2.



PAUL J. FISHMAN
UNITED STATES ATTORNEY

CASE NUMBER:

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v.

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INFORMATION FOR

18 U.S.C. §§ 1343 and 2

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

UNITED STATES OF AMERICA	:	Criminal Number 13-
	:	
v.	:	
	:	
CHRISTOPHER L. HENDERSON	:	WAIVER OF INDICTMENT

I, CHRISTOPHER L. HENDERSON, the above-named defendant, who is charged with wire fraud, from in or about May 2013 to in or about June 2013, in violation of Title 18, United States Code, Sections 1343 and 2, being advised of the nature of the charge, the proposed Information, and my rights, hereby waive in open court on _____, 2013, prosecution by indictment and consent that the proceeding may be by information rather than by indictment.

Christopher L. Henderson

Joshua P. Cohn, Esq.
Counsel for the Defendant

Before: _____
HONORABLE
United States District Judge