LSG/2008R00893

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA	:	Hon.
v.	:	Crim. No.
SYED REHMAN	:	18 U.S.C. § § 1344 & 2

INFORMATION

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

1. At all times relevant to this Information, defendant **SYED REHMAN**, residing in Jersey City, New Jersey, owned and operated ZHN Auto Repair ("ZHN"), located at 519 West 38th Street, New York, New York.

2. At all times relevant to this Information, JP Morgan Chase, Bank of America, and Citigroup were financial institutions as that term is defined in Title 18, United States Code, Section 20.

The Scheme to Defraud

3. From in or about November 2004 through in or about November 2008, in Hudson County, in the District of New Jersey, and elsewhere, defendant

SYED REHMAN

did knowingly and intentionally execute and attempt to execute a scheme and artifice to defraud financial institutions, namely, those financial institutions named in paragraph 2, above, and to obtain money, funds, and other property owned by and under the custody and control of those financial institutions by means of materially false and fraudulent pretenses, representations, and

promises, as set forth below.

The Object of the Scheme

4. It was the primary object of the scheme for defendant **SYED REHMAN** and others to enrich themselves by using social security numbers and other identity information that defendant **SYED REHMAN** unlawfully obtained from the Social Security Administration to open accounts at various financial institutions and to obtain credit cards, mortgage loans, and other financial credits and services, intending not to repay the financial institutions.

Manner and Means of the Scheme

5. It was part of the scheme that defendant **SYED REHMAN** paid an employee of the Social Security Administration to unlawfully provide and confirm social security numbers that had been assigned to young children in order to obtain social security numbers that were not connected to individuals with poor credit histories.

6. It was a further part of the scheme that defendant **SYED REHMAN** used, and provided to others to use, the social security numbers he obtained through the scheme on applications for credit cards and mortgage loans to induce financial institutions to provide and grant various financial services, such as credit cards and mortgage loans, so that defendant **SYED REHMAN** and others could conceal their true identities and fraudulent purposes.

7. It was a further part of the scheme that defendant **SYED REHMAN** allowed others to claim they were employed by ZHN and allowed them to claim false employment histories and high salaries for use in conjunction with applications for credit cards and mortgage loans.

8. It was a further part of the scheme that, on or about the dates shown below,

defendant **SYED REHMAN**, acting in concert with others, used the social security numbers obtained through the scheme, as listed below, to obtain credit cards issued by the financial institutions, described below, resulting in the following losses to the financial institutions:

	Approximate Date	Social Security No.	Financial Institution/ Account No.	Approximate Loss
a.	July 16, 2007	xxx-xx-7124	JP Morgan Chase/ ****5250	$457
b.	July 20, 2007	xxx-xx-7124	Bank of America/ ****7122	$13,165
c.	July 25, 2007	xxx-xx-7124	Citigroup/ ****0459	$50,114
d.	July 25, 2007	xxx-xx-7124	Citigroup/ ****2196	$34,050
e.	November 26, 2008	xxx-xx-8469	JP Morgan Chase/ ****7955	$3,990

9. It was a further part of the scheme that, on or about July 17, 2007 defendant **SYED REHMAN** provided social security number XXX-XX-7637 to an individual who used this number to obtain a mortgage loan from JP Morgan Chase in the approximate amount of $499,000 on property located on Sip Avenue in Jersey City, New Jersey. The borrower failed to repay this loan, and the property entered foreclosure with an outstanding balance of approximately $495,382.

10. It was a further part of the scheme that, on or about January 23, 2008, defendant **SYED REHMAN** obtained an inflated and fraudulent appraisal so that a borrower could and did obtain a mortgage loan from Bank of America in the approximate amount of $646,000 on property located on Elm Street in Jersey City, New Jersey. The borrower failed to repay the mortgage loan and the property entered foreclosure with an outstanding balance of

approximately $645,361.

In violation of Title 18, United States Code, Sections 1344 & 2.

PAUL J. FISHMAN
UNITED STATES ATTORNEY

CASE NUMBER: _____

United States District Court
District of New Jersey

UNITED STATES OF AMERICA

v.

SYED REHMAN

INFORMATION FOR

18 U.S.C. §§ 1344 & 2

PAUL J. FISHMAN
UNITED STATES ATTORNEY, NEWARK, NEW JERSEY

LORRAINE S. GERSON
ASSISTANT U.S. ATTORNEY
NEWARK, NEW JERSEY
973-645-2789