

2022R00089/ADK

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*By Stephen Bond at 2:14 pm, Mar 01, 2022*

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

UNITED STATES OF AMERICA	:	Hon. Esther Salas
	:	
	:	Crim. No.22-167-ES
v.	:	
	:	18 U.S.C. § 1349
	:	18 U.S.C. § 1343 and 2
MOHAMED KAMARA	:	18 U.S.C. § 1028A

**INDICTMENT**

The Grand Jury in and for the District of New Jersey, sitting at Newark, charges as follows:

**COUNT ONE**  
**(Conspiracy to Commit Wire Fraud)**

**Introduction**

1. From in or around March 2020 to in or around October 2020, defendant Mohamed Kamara (“KAMARA”) conspired with others to fraudulently obtain more than \$750,000 in Economic Injury Disaster Loans (“EIDLs”). In addition, from in or around January 2020 to in or around September 2020, KAMARA fraudulently obtained more than \$150,000 in unemployment insurance benefits (“UIBs”) from the State of New Jersey. As part of his UIB scheme, KAMARA committed aggravated identity theft by using the names, dates of birth, and social security numbers belonging to other individuals to fraudulently obtain the UIBs.

**Relevant Background**

- 2. At various times relevant to this Indictment:
  - a. Defendant Kamara was a resident of New Jersey or Maryland.

that typically set additional state-specific requirements for eligibility, benefit amounts, and duration of payments. Generally, UIB amounts were based on a percentage of earnings over a fixed period.

e. The SWA for the State of New Jersey was the New Jersey Department of Labor (“NJ DOL”), which administered an online portal for collecting UIB applications. The servers for the portal were located in Mercer County, New Jersey.

### **The Conspiracy**

3. From in or about March 2020 through in or about October 2020, in Bergen County, in the District of New Jersey, and elsewhere, defendant

MOHAMED KAMARA

did knowingly and intentionally conspire with others to devise, and intend to devise, a scheme and artifice to defraud the SBA and others, 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 to defraud, did transmit and cause to be transmitted by means of wire communications in interstate and foreign commerce, certain writings, signs, signals, pictures, and sounds, contrary to Title 18, United States Code, Section 1343.

### **Goal of the Conspiracy**

3. The goal of the conspiracy was for KAMARA and his conspirators to enrich themselves by fraudulently obtaining EIDL loans.

**Manner and Means of the Conspiracy**

4. It was part of the conspiracy that:
  - a. KARMARA and his conspirators submitted applications for EIDLs using information belonging to other individuals and entities without their knowledge and consent.
  - b. KAMARA and his conspirators opened bank accounts using fraudulent documents (“the Fraud Bank Accounts”).
  - c. KAMARA and his conspirators caused the SBA to grant the fraudulent EIDL applications and to send the proceeds of the EIDLs to the Fraud Bank Accounts by wire communication. At least one of the EIDL wire transfers to a Fraud Bank Account involved a wire communication from a location outside of New Jersey to a location in Bergen County, New Jersey.
  - d. KAMARA then deposited or attempted to deposit checks from the Fraud Bank Accounts into a bank account in his name.
  - e. KAMARA and his conspirators’ fraudulent EIDL applications caused the SBA to provide more than \$750,000 in EIDLs.

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

**COUNT TWO**  
**(Wire Fraud)**

1. The allegations in paragraphs 1 and 2 of Count 1 of this Indictment are realleged here.

**The Scheme to Defraud**

2. From on or about January 1, 2020, through on or about September 30, 2020, in Mercer County, in the District of New Jersey, and elsewhere, defendant

MOHAMED KAMARA

did knowingly and intentionally devise, and intend to devise, a scheme and artifice to defraud the State of New Jersey, and to obtain money and property from the State of New Jersey by means of materially false and fraudulent pretenses, representations and promises, and, for purposes of executing and attempting to execute such scheme and artifice to defraud, did knowingly and intentionally transmit and cause to be transmitted by means of wire communications in interstate and foreign commerce certain writings, signs, signals, pictures and sounds, including a wire communication from Maryland to New Jersey, as more fully set forth below.

**Goal of the Scheme to Defraud**

3. The goal of the scheme and artifice to defraud was for KAMARA to enrich himself by obtaining money from the State of New Jersey by submitting fraudulent UIB applications in the names of other individuals.

**Manner and Means of the Scheme to Defraud**

4. It was part of the scheme and artifice to defraud that:
  - a. KAMARA obtained personal identification, including names, dates of birth, and social security numbers, belonging to other individuals (“the PII”).
  - b. KAMARA submitted applications for UIBs to the NJ DOL from his residence in Maryland using the PII (“the Fraudulent Applications”).
  - c. KAMARA caused the State of New Jersey to approve and distribute more than \$150,000 in response to the Fraudulent Applications.

**Execution of the Scheme**

5. On or about May 10, 2020, for the purpose of executing the scheme and artifice to defraud, in the District of New Jersey, and elsewhere, defendant

MOHAMED KAMARA

knowingly and intentionally transmitted and caused to be transmitted by means of wire communication in interstate and foreign commerce, certain writings, signs, signals, pictures, and sounds, namely, an application for UIBs in the name of F.K., from a location in Maryland to a location in New Jersey.

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

**COUNT THREE**  
**(Aggravated Identity Theft)**

1. The allegations in paragraph 1 through 5 of Count 2 of this Indictment are realleged here.

2. On or about May 10, 2020, in Mercer County, in the District of New Jersey, and elsewhere, the defendant

MOHAMED KAMARA

during and in relation to a felony violation of 18 U.S.C. § 1343 as set forth in Count Two of this Indictment, did knowingly and intentionally transfer, possess, and use, without lawful authority, a means of identification of another person, to wit, the name, date of birth, and social security number of F.K., knowing that the means of identification belonged to another actual person.

In violation of Title 18, United States Code, Section 1028A.



**FORFEITURE ALLEGATIONS AS TO COUNTS ONE AND TWO**

1. Upon conviction of the offenses charged in Counts One and Two of this Indictment, the government will seek forfeiture from defendant KAMARA, in accordance with Title 28, United States Code, Section 2461(c), and Title 18, United States Code, Section 981(a)(1)(C), of any and all property, real or personal, that constitutes or is derived from proceeds traceable to the violations of Title 18, United States Code, Sections 1343 and 1349.

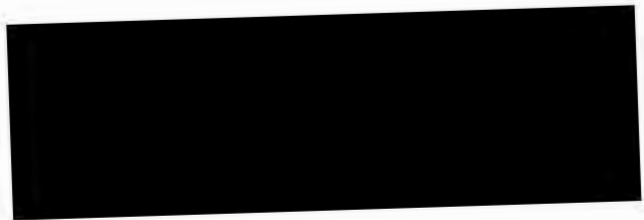
**Substitute Assets Provision**

2. If by any act or omission of defendant KAMARA any of the property subject to forfeiture herein:

- 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,

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of defendant KAMARA up to the value of the property described in this forfeiture allegation.

A TRUE BILL



*Philip R. Sellinger*

PHILIP R. SELLINGER  
United States Attorney



CASE NUMBER: \_\_\_\_\_

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**United States District Court  
District of New Jersey**

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**UNITED STATES OF AMERICA**

**v.**

**MOHAMED KAMARA**

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**INDICTMENT FOR**

**18 U.S.C. §§ 1028A, 1343 and 1349**

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A True Bill



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**PHILIP R. SELLINGER**  
UNITED STATES ATTORNEY  
FOR THE DISTRICT OF NEW JERSEY

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**ANDREW KOGAN**  
ASSISTANT U.S. ATTORNEY  
NEWARK, NEW JERSEY  
973.645.2700

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