

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
WESTERN DIVISION

UNITED STATES OF AMERICA)
) No. _____
 vs.) Violation: Title 18, United States Code,
) Section 1343
NASEEM SALAMAH)

The UNITED STATES ATTORNEY charges:

1. At times material to this information:
 - a. Company A was a wealth management company based in Florida with an office in Loves Park, Illinois. Company A operated under Company B's platform and used Company B as the clearinghouse for any financial transactions initiated by Company A and its customers.
 - b. Defendant NASEEM SALAMAH was an investment advisor with Company A in Loves Park, Illinois.
 - c. Customers A, B and C were customers of Company A. Defendant NASEEM SALAMAH was the investment advisor for Customers A, B and C.
 - d. When a customer wanted a distribution of funds from their account, a Money Movement Cover Letter was faxed to Company B at one of Company B's operation centers in El Paso, Texas, Orlando, Florida, or Phoenix, Arizona from Company A. At some point, Company A used Company B's online portal to request funds distributions for Company A's customers.
2. From at least as early as August 2017, and continuing to May 2021, in Loves Park, in the Northern District of Illinois, Western Division, and elsewhere,

NASEEM SALAMAH,

defendant herein, knowingly devised, intended to devise, and participated in a scheme to defraud, and to obtain money and property from Customers A, B and C by means of materially false and fraudulent pretenses, representations, and promises, which scheme is more fully set out below.

3. It was the object of the scheme that defendant NASEEM SALAMAH would and did enrich himself by obtaining more than \$950,000 in money from Customers A, B and C's accounts at Company A, which funds SALAMAH used for his own benefit without Customers A, B and C's knowledge or consent.

4. It was a part of the scheme that, between August 2017 and May 2021, defendant NASEEM SALAMAH fraudulently initiated the disbursement of funds from Customers A, B and C's Company A accounts. SALAMAH forged the signature of a Company A representative on the Money Movement Cover Letters and had the customers sign the letter. SALAMAH told the customers that he needed to move the money to diversify the customers' assets when, as SALAMAH knew, he intended to cause the money to be deposited into a bank account he controlled and used for his personal benefit.

5. It was further part of the scheme that defendant NASEEM SALAMAH caused the customers' disbursement checks to be issued to a name he provided, mailed to him, and deposited into a bank account he controlled.

6. It was further part of the scheme that defendant NASEEM SALAMAH did misrepresent, conceal, and hide, and did cause to be misrepresented, concealed, and hidden, acts done in furtherance of the scheme and the purpose of those acts. For example, when questioned by a customer about account activity, defendant SALAMAH created false account statements that he provided to the customer.

7. On or about May 29, 2018, at Loves Park, in the Northern District of Illinois, Western Division, and elsewhere,

NASEEM SALAMAH,

defendant herein, for the purpose of executing the scheme to defraud and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, knowingly caused to be transmitted by means of wire communication in interstate commerce, certain writings, signs, signals, and sounds, namely, a facsimile containing a Money Movement Cover Letter requesting a \$16,894.63 disbursement by check from Customer A's Company A account, from Company A's location in Loves Park, Illinois to a Company B operation center in El Paso, Texas, Orlando, Florida, or Phoenix, Arizona;

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

FORFEITURE ALLEGATION

The UNITED STATES ATTORNEY further alleges:

1. Upon conviction of an offense in violation of Title 18, United States Code, Section 1343, as set forth in this information, defendant shall forfeit to the United States of America any property which constitutes and is derived from proceeds traceable to the offense, as provided in Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

2. The property to be forfeited includes, but is not limited to:

- a. a personal money judgment in the amount of \$968,582.12; and
- b. an 18-karat white-gold necklace with ruby.

3. If any of the property described above, as a result of any act or omission by defendant cannot: be located upon the exercise of due diligence; has been transferred to, sold to, or deposited with a third person; has been placed beyond the jurisdiction of the court; has been substantially diminished in value; or has been commingled with other property that cannot be subdivided without difficulty; the United States of America shall be entitled to forfeiture of substitute property as provided in Title 21, United States Code, Section 853(p).

UNITED STATES ATTORNEY