

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon.
 :
 v. : Criminal No. 13-____
 :
 MAHMUD S. HAMMAD : 18 U.S.C. § 666(a)(2)
 a/k/a "Mahmoud Abuhabdeh" : 18 U.S.C. § 2

INFORMATION

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

(18 U.S.C. § 666(a)(2) and § 2)
(Bribery)

1. At all times relevant to this Information:
 - a. Defendant MAHMUD S. HAMMAD was a resident of Bergen County, New Jersey.
 - b. There was an agent of the Federal Bureau of Investigation ("FBI") who was operating in an undercover capacity (the "UC").
 - c. The Passaic County Prosecutor's Office was a local government agency that received federal assistance in excess of \$10,000 in the year 2012.
2. On or about May 22, 2012, defendant MAHMUD S. HAMMAD was arrested by members of the Woodland Park Borough Police Department and was charged with several criminal offenses, including possession of a controlled dangerous substance.

3. From in or about May 2012 to in or about August 2012, defendant MAHMUD S. HAMMAD's resulting criminal case was pending before the Passaic County Superior Court and was being prosecuted by the Passaic County Prosecutor's Office.

4. From in or about July 2012 to in or about August 2012, in Passaic and Hudson Counties, in the District of New Jersey, and elsewhere, defendant

MAHMUD S. HAMMAD,
a/k/a "Mahmoud Abuhabdeh"

did knowingly and corruptly give, offer and agree to give a thing of value, through the U.C., to personnel at the Passaic County Prosecutor's Office with the intent to influence and reward such personnel, in connection with a business, transaction and series of transactions of the Passaic County Prosecutor's Office involving a thing of value of \$5,000 and more.

5. On or about July 27, 2012, defendant MAHMUD S. HAMMAD had a meeting with the UC at a location in Jersey City, New Jersey. During the meeting, defendant MAHMUD S. HAMMAD told the UC that he wanted to have the charges that were pending with the Passaic County Prosecutor's Office dismissed and stated "I don't want anything on my record." Defendant MAHMUD S. HAMMAD agreed with the UC to corruptly pay \$10,000 to have the charges dismissed, and gave the UC a "good faith" cash payment of \$1,500. Defendant MAHMUD S. HAMMAD further stated to the UC "I know in

life there isn't so many guarantees, but I was told there was a guarantee."

6. On or about August 8, 2012, defendant MAHMUD S. HAMMAD had a meeting with the UC at a location in Jersey City, New Jersey. During the meeting, defendant MAHMUD S. HAMMAD was informed by the UC that most of the money that defendant MAHMUD S. HAMMAD was going to pay to dismiss his case would be used to corruptly pay personnel at the Passaic County Prosecutor's Office (there was, in fact, no personnel at the Passaic County Prosecutor's Office involved in the corrupt activity discussed during these meetings). In furtherance of his plan to have his charges dismissed, defendant MAHMUD S. HAMMAD gave the UC a handwritten piece of paper with MAHMUD S. HAMMAD's criminal case number, name and date of birth. After being advised by the UC that defendant MAHMUD S. HAMMAD could back out of the agreement to pay the bribe to dismiss the charges, defendant MAHMUD S. HAMMAD stated "listen, this is what it is. That's it. I'm in it."

In violation of Title 18, United States Code, Sections 666(a)(2) and 2.



PAUL J. FISHMAN
United States Attorney

CASE NUMBER: 13-

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

UNITED STATES OF AMERICA

v.

**MAHMUD S. HAMMAD
a/k/a "Mahmoud Abuhabdeh"**

INDICTMENT FOR

18 U.S.C. § 666(a)(2)

18 U.S.C. § 2

A True Bill,

Foreperson

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

**BARBARA R. LLANES
ASSISTANT U.S. ATTORNEY
(973) 297-2051**
