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

UNITED STATES OF AMERICA : **CRIMINAL COMPLAINT**

v. :

MIRIAM FRIEDMAN : Mag. No. 14-3503 (MF)

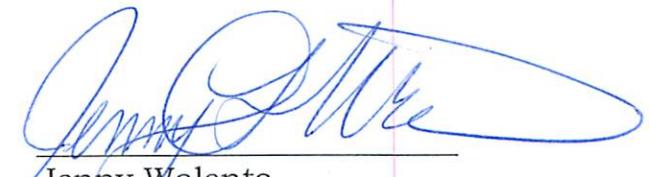
I, Jenny Walenta, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

SEE ATTACHMENT A

I further state that I am a Special Agent with U.S. Department of Veterans Affairs, Office of the Inspector General ("VA-OIG"), and that this Criminal Complaint is based on the following facts:

SEE ATTACHMENT B

continued on the attached page and made a part hereof.



Jenny Walenta
Special Agent, VA-OIG

Sworn to before me and subscribed in my presence,

January 2, 2014
Date

at Newark, New Jersey
City and State

HONORABLE MARK FALK
UNITED STATES MAGISTRATE JUDGE



Signature of Judicial Officer

ATTACHMENT A

From at least as early as in or about November, 2009, until in or about October, 2011, in the District of New Jersey, and elsewhere, the defendant

MIRIAM FRIEDMAN,

having devised a scheme and artifice to defraud the U.S. Department of Veterans Affairs ("VA"), and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises, namely, false statements to the VA and others that her company, Office Dimensions, Inc. ("Office Dimensions"), was a Service-Disabled Veteran-Owned Small Business ("SDVOSB") eligible for government contracts set aside for such businesses, when in fact Office Dimensions was not an SDVOSB, did transmit and cause to be transmitted by means of wire in interstate commerce writings, namely, a fraudulent electronic certification of Office Dimension's SDVOSB status in a central database for government contractors, wired from Teaneck, New Jersey to Battle Creek, Michigan on or about November 23, 2009, for the purpose of executing such scheme and artifice.

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

ATTACHMENT B

I, Jenny Walenta, a Special Agent with the U.S. Department of Veterans Affairs, Office of the Inspector General ("VA-OIG"), having conducted an investigation, spoken with other individuals, and reviewed public records and other documents, have knowledge of the following facts. Where conversations or statements are described, they are described in substance and in part. All dates, locations, quantities, and dollar amounts are approximate. Because this affidavit is being submitted for a limited purpose, I have not included all facts and information known to me concerning this matter.

Regulatory Framework

1. At all times relevant to this Complaint:

a. The Service-Disabled Veteran-Owned Small-Business ("SDVOSB") procurement program set aside government contracts for qualifying individuals and businesses. The program was designed both to offer opportunities to small businesses and to honor the extraordinary service of veterans with service-related disabilities.

b. To be eligible for an SDVOSB contract, a business must have met the following criteria:

(i.) the business must qualify as a small business;

(ii.) a service-disabled veteran (i.e., a veteran whose disability resulted from his or her service in the armed forces) must own more than 50 percent of that small business; and

(iii.) that service-disabled veteran must manage and control daily operations of that small business.

The Entities

2. At times relevant to this Complaint and according to VA records and other documents:

a. The defendant Miriam Friedman ("defendant FRIEDMAN") was a resident of Teaneck, New Jersey and had never served in the U.S. military.

b. B.F. was defendant FRIEDMAN's spouse and a resident of Teaneck, New Jersey. B.F. had never served in the U.S. military.

c. M.F. was a retired U.S. military veteran and defendant FRIEDMAN's father-in-law. M.F. was not service-disabled. On his applications

for U.S. Department of Veterans Affairs ("VA") benefits, M.F. held himself out as unemployed.

d. Office Dimensions, Inc. ("Office Dimensions"), was a business that defendant FRIEDMAN and B.F. owned and operated out of their home in Teaneck. Office Dimensions sold furniture and design services to industrial and government customers. Defendant FRIEDMAN and B.F. controlled all of Office Dimension's revenues and ran Office Dimension's day-to-day operations. M.F. occasionally consulted for Office Dimensions, but never earned more than \$1,200 in any calendar year.

The Scheme

3. From November, 2009, through October, 2011, defendant FRIEDMAN fraudulently represented Office Dimensions to be an SDVOSB owned and operated by her father-in-law, M.F., to obtain contracts from the VA that were set aside for real SDVOSBs.

4. On November 23, 2009, defendant FRIEDMAN, who had previously been holding out Office Dimensions as a woman-owned business – which public records confirm it was – self-certified in a central registry for government contractors that Office Dimensions was an SDVOSB. This wire communication was transmitted from Teaneck, New Jersey to Battle Creek, Michigan. Shortly thereafter, defendant FRIEDMAN started bidding for VA contracts set aside for SDVOSBs, and the VA started awarding Office Dimensions contracts set aside for SDVOSBs.

5. On the basis of this fraudulent representation, from January, 2010, through November, 2011, the VA paid Office Dimensions more than \$1.2 million for contracts to which defendant FRIEDMAN was not entitled.

6. During that same time period, defendant FRIEDMAN held out Office Dimensions as a woman-owned business in New York State to obtain contracts set aside for such businesses. (Under N.Y. Exec. Law § 314(2-a)(a)(i), a woman must own 51 percent or more of a business for it to qualify as a woman-owned business eligible for set-aside contracts.)