

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Criminal No. 11-
:
v. : 18 U.S.C. § 1960 and § 2
: 18 U.S.C. § 982(a)(1)
EDMOND NAHUM : 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:
 - a. Defendant EDMOND NAHUM resided in Deal, New Jersey and was a rabbi at Deal Synagogue, a synagogue located in Deal, New Jersey.
 - b. Through his position as a rabbi, defendant EDMOND NAHUM operated or was affiliated with Deal Kupot and Ahavat Haim Vachessed (hereinafter, "AHV"), organizations which accepted monies from individuals and transmitted the money to other individuals or organizations located in the United States.
 - c. Saul Kassin resided in Brooklyn, New York and was the chief rabbi of a synagogue located in Brooklyn. Through his position as a rabbi, Kassin operated or was affiliated with Magen Israel Society, a charitable organization.
 - d. There was a cooperating witness (hereinafter, the "CW") who had been charged in a Federal criminal complaint with

bank fraud in or about May 2006. At the direction, and with the approval of, the Federal Bureau of Investigation ("FBI"), the CW provided defendant EDMOND NAHUM with bank checks drawn upon a New Jersey bank account totaling between \$120,000 and \$200,000.

Defendant EDMOND NAHUM supplied Rabbi Saul Kassin with a number of these checks, and Kassin in turn issued checks for the CW that were drawn upon the account of Magen Israel Society and that were made payable to organizations based in New Jersey in exchange for a 10% fee received by Kassin. In addition, defendant EDMOND NAHUM himself issued checks for the CW that were drawn upon the accounts that he controlled - those of Deal Kupot and AHV - and that were made payable to organizations based in New Jersey.

2. At all times relevant to this Information:

a. The law of the State of New Jersey, N.J.S.A. 17:15C-4(a), provided that "no person . . . shall engage in the business of money transmission without a license" Violations of this law were punishable as a felony (third-degree).

b. The law of the State of New York, McKinney's Banking Law § 641, provided that "[n]o person shall engage in the business . . . of receiving money for transmission work transmitting the same, without a license" Violations of this law were punishable as a misdemeanor.

c. Federal law provided that "[a]ny person who owns

or controls a money transmitting business shall register the business (whether or not the business is licensed as a money transmitting business in any State) with the Secretary of the Treasury" See 31 U.S.C. § 5330(a)(1).

d. Neither defendant EDMOND NAHUM, nor Deal Kupot and AHV, were licensed with the States of New Jersey or New York, or registered with the Secretary of the Treasury, as a transmitting business.

e. Neither Saul Kassin, nor Magen Israel Society, was licensed with the States of New Jersey or New York, or registered with the Secretary of the Treasury, as a transmitting business.

3. From in or about June 2007 to in or about December 2008, in Monmouth County, in the District of New Jersey, and elsewhere, defendant

EDMOND NAHUM

knowingly conducted, controlled, managed, supervised, and directed all or part of an unlicensed money transmitting business, and aided and assisted in the same, which business affected interstate commerce and (a) was operated without an appropriate money transmitting license in New Jersey and New York, where such operation was punishable as a felony or misdemeanor under those States' laws; and (b) failed to comply with the money transmitting business registration requirements under Title 31, United States Code, Section 5330 and regulations

under Title 31, United States Code, Section 5330 and regulations prescribed under that Section.

In violation of Title 18, United States Code, Section 1960 and Section 2.

FORFEITURE ALLEGATION

(18 U.S.C. § 982)

As the result of committing the aforementioned offense in violation of Title 18, United States Code, Section 1960, as alleged in this Information, defendant EDMOND NAHUM shall forfeit to the United States, pursuant to 18 U.S.C. § 982(a)(1), any interest on behalf of himself personally in property, real and personal, that was involved in such offense or traceable to such property, in the amount of \$175,381.33.

If any of the above-described forfeitable property, as a result of any act or omission of defendant EDMOND NAHUM:

- (1) cannot be located upon the exercise of due diligence;
- (2) has been transferred or sold to, or deposited with, a third party;
- (3) has been placed beyond the jurisdiction of the court;
- (4) has been substantially diminished in value; or
- (5) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to 18 U.S.C. § 982(b), to seek forfeiture of any other property of defendant NAHUM up to the value of the above forfeitable property.



PAUL J. FISHMAN
United States Attorney

CASE NUMBER: 11-

United States District Court
District of New Jersey

UNITED STATES OF AMERICA

v.

EDMOND NAHUM

INFORMATION

18 U.S.C. § 1960 and § 2
18 U.S.C. § 982(a)(1)

PAUL J. FISHMAN
U.S. ATTORNEY
NEWARK, NEW JERSEY

BRIAN R. HOWE
ASSISTANT U.S. ATTORNEY
NEWARK, NEW JERSEY
(973) 645-2700
