

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon.
 :
 v. : Crim. No.
 :
 AL RAIMI : 18 U.S.C. § 654 and § 2
 :
 : INFORMATION

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

Theft By A Government Officer

1. At all times relevant to this Information:

A. Defendant Al RAIMI (hereinafter "RAIMI") was employed by the Transportation Security Administration ("TSA") as a Lead Transportation Security Officer ("LTSO") at Newark Liberty International Airport (the "Airport").

B. TSA was an agency of the United States government within the United States Department of Homeland Security. TSA conducted security screenings ("Screenings") of airline passengers at the Airport. Screenings were mandatory for all passengers who wished to travel from the Airport. Screenings were typically conducted by TSA employees, including LTSOs such as defendant RAIMI.

C. RAIMI worked as a LTSO at the B-3 security checkpoint for Terminal B at the Airport (the "B-3 checkpoint"). Defendant RAIMI regularly participated in the initial and secondary Screenings of passengers.

2. Beginning in or about October 2009 to on or about September 8, 2010, defendant RAIMI regularly stole cash from passengers during Screenings that he conducted at the B-3 checkpoint, totaling between approximately \$10,000 and \$30,000. Defendant RAIMI's immediate supervisor was aware that defendant RAIMI was stealing from passengers during this time period. Defendant RAIMI and his Supervisor agreed that when defendant RAIMI stole cash from a passenger traveling through the B-3 checkpoint, defendant RAIMI would "kick up" half of the amount that defendant RAIMI had stolen to his Supervisor. In exchange for the payments that he received from defendant RAIMI, the Supervisor never notified his superiors at TSA or any other law enforcement agency about defendant RAIMI's illegal activities.

3. Some of defendant RAIMI's thefts were recorded on the video surveillance for the B-3 checkpoint. For example, on or about August 31, 2010, video surveillance showed defendant RAIMI stealing approximately \$5,000 from a female passenger's handbag while defendant RAIMI conducted a secondary Screening of her belongings.

4. From in or about October 2009 to on or about September 8, 2010, in Essex and Union Counties, in the District of New Jersey, and elsewhere, the defendant

AL RAIMI,

while being an officer and employee of the United States and a department and agency thereof, knowingly embezzled and wrongfully converted to his own use the property and money of another

greater than \$1,000 which came into his possession and under his control in the execution of such employment, and under color and claim of authority as such officer and employee.

In violation of Title 18, United States Code, Section 654 and Section 2.


PAUL J. FISHMAN
United States Attorney

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18 U.S.C. §§ 654 & 2

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