

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

UNITED STATES OF AMERICA	:	Hon.
	:	
V.	:	Crim. No. 24-
	:	
ALEXANDER ARISMENDY ALIX	:	18 U.S.C. § 1349
HERNANDEZ	:	

INFORMATION

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

1. Defendant Alexander Arismendy Alix Hernandez (“ALIX”) was a resident of the Bronx, New York.

The Conspiracy

2. From in or around May 2020 through in or around April 2023, in Essex County, in the District of New Jersey, and elsewhere, the defendant,

ALEXANDER ARISMENDY ALIX HERNANDEZ,

knowingly and intentionally conspired and agreed with others to devise a scheme and artifice to defraud, and to obtain money and property by means of false and fraudulent pretenses, representations, and promises, and for the purpose of executing such scheme and artifice to defraud, did knowingly transmit and cause to be transmitted by means of wire communications in interstate and foreign commerce, certain writings, signs, signals, pictures, and sounds, contrary to Title 18, United States Code, Section 1343.

Goal of the Conspiracy

3. The goal of the conspiracy was for ALIX and his co-conspirators to unlawfully enrich themselves by defrauding state government entities of millions of dollars in unemployment benefits (the “Unemployment Benefits”), which were made available through the Coronavirus Aid, Relief, and Economic Security (“CARES”) Act.

Manner and Means of the Conspiracy

4. It was part of the conspiracy that:

a. ALIX and others conspired to defraud states of Unemployment Benefits by using stolen personally identifying information (“PII”) of numerous unwitting individuals (the “Individuals”) to create fictitious user profiles in their names seeking Unemployment Benefits without their knowledge or consent. The PII included names, dates of birth, social security numbers, and other information. ALIX and his co-conspirators also used fictitious and/or co-conspirator-controlled email addresses, phone numbers, and mailing addresses, including in New Jersey, to complete the fictitious user profiles to execute the scheme.

b. Once the state government entities approved the fraudulent Unemployment Benefits applications, ALIX and his co-conspirators obtained the funds using debit cards that were either: (i) directly loaded with the benefits through regular installment payments, or (ii) linked to bank accounts that received the benefits by direct deposits.

c. ALIX and his co-conspirators then used the debit cards to withdraw cash from ATMs, including in New Jersey, or to make purchases. When

ALIX collected the cash, he kept a portion as a fee and then passed the remainder to a co-conspirator.

d. For example, ALIX and his co-conspirators used PII for an unwitting individual (“Individual-1”) to fraudulently obtain approximately \$34,758 in Unemployment Benefits from the New York Department of Labor (the “NY DOL”). ALIX’s Apple iCloud account contained notes with Individual-1’s PII, including a Social Security Number, date of birth, phone number, and address. In addition, when law enforcement searched ALIX’s residence in the Bronx, New York on or about April 26, 2023, it contained, among other things, a debit card (“Card-1”) containing Unemployment Benefits for Individual-1, which was used to withdraw thousands of dollars of cash from ATMs in and around New York, Connecticut, and Massachusetts. Each of these ATM transactions were processed via interstate and/or international wires.

e. ALIX and his co-conspirators also used PII for another unwitting individual (“Individual-2”) to fraudulently obtain approximately \$30,234 in Unemployment Benefits from the Pennsylvania Department of Labor (“PA DOL”). From in or around July 2020 through in or around June 2021, they accessed Individual-2’s purported PA DOL Unemployment Benefits application from ALIX’s residence in the Bronx. Subsequently, in or around July 2021, two of ALIX’s co-conspirators communicated via an internet-based messaging application concerning a debit card containing Individual-2’s Unemployment Benefits (“Card-2”). At least two of ALIX’s co-conspirators used Card-2 to, among other things, withdraw cash

from ATMs in or around Fairfield, New Jersey. These transactions were processed via interstate wires.

In violation of Title 18, United States Code, Section 1349.

FORFEITURE ALLEGATION

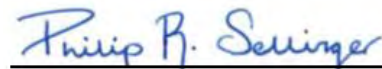
1. Upon conviction of the wire fraud offense charged in this Information, defendant **ALEXANDER ARISMENDY ALIX HERNANDEZ** shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), all property, real and personal, the defendant obtained that constitutes or is derived from proceeds traceable to the commission of the offense, and all property traceable thereto.

SUBSTITUTE ASSETS PROVISION

2. If any of the property described above, as a result of any act or omission of the defendant:

- a) cannot be located upon the exercise of due diligence;
- b) has been transferred or sold to, or deposited with, a third party;
- c) has been placed beyond the jurisdiction of the court;
- d) has been substantially diminished in value; or
- e) has been commingled with other property which cannot be divided without difficulty,

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.



PHILIP R. SELLINGER
United States Attorney