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CLERK, U.S. DISTRICT COURT - DNJ

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA

v.

JAMES WAJDA

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:
:
:
:

Hon.

Crim. No.

18 U.S.C. §§ 1343 and 1349

Zahid N. Quraishi
25-cr-97 (2ND)

INFORMATION

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

DEFENDANT AND OTHER INDIVIDUALS AND ENTITIES

1. At all times relevant to this Information:

A. Airline-1 was an airline headquartered in Chicago, Illinois. Newark Liberty International Airport in New Jersey ("Newark Airport") was one of Airline-1's hubs.

B. Company-1 was a company headquartered in Des Plaines, Illinois that provided various services to Airline-1 at Newark Airport, including cabin cleaning services.

C. Defendant JAMES WAJDA ("WAJDA") was the Chief Operating Officer of Company-1.

D. Company-2 was a New Jersey holding company for approximately five different operating groups. Company-2, through its operating groups, provided various services to airlines, including Airline-1, and airports, including Newark

Airport. For example, Company-2 provided parking security services, facilities maintenance services, and transportation services to Airline-1 at Newark Airport.

E. Co-Conspirator-1 was the Chief Executive Officer of Company-2 and worked in New Jersey.

THE OFFENSE

2. From in or about December 2021 through in or about November 2022, in Essex County, in the District of New Jersey, and elsewhere, defendant

JAMES WAJDA,

Co-Conspirator-1, and others did knowingly and intentionally conspire and agree with each other and others to devise and execute a scheme and artifice to defraud Airline-1 and Company-1, and to obtain money from Airline-1 and Company-1 by means of materially false and fraudulent pretenses, representations, and promises, facilitated by the use of interstate wire transmissions.

The Goal of the Conspiracy

3. The goal of the conspiracy was for defendant WAJDA and Co-Conspirator-1 to enrich themselves by submitting fraudulent invoices to Company-1, which in turn sought partial reimbursement from Airline-1, for work that was never performed.

Manner and Means of the Conspiracy

4. To carry out the conspiracy and to effect its unlawful goal and object, defendant WAJDA, Co-Conspirator-1, and others engaged in a variety of means and methods including, among others, those described below.

5. In or about December 2021, Company-1 held a contract with Airline-1 to load provisions onto Airline-1 aircraft.

6. In or about March 2022, defendant WAJDA and Co-Conspirator-1 devised a scheme to defraud Airline-1 and Company-1. They agreed that Company-2 would invoice Company-1 for a “dispatcher” to assist in the transportation of the provisions, as if Company-1 had subcontracted Company-2 to assist in dispatching the trucks that were bringing provisions to the aircraft to load. They knew at the time that at least some of the dispatching services for which Company-2 invoiced Company-1 were never rendered. Company-1 paid the invoices to Company-2. At the same time, Company-1 also sought reimbursement for at least a portion of the payment from Airline-1 under its existing contract.

7. Defendant WAJDA and Co-Conspirator-1 submitted the false invoices with the intent to defraud Company-1 and Airline-1. Company-2 sent the fraudulent invoices to Company-1 via email through a server outside New Jersey. Company-1 then paid Company-2 by check.

8. For example, on or about May 3, 2022, Company-2 transmitted an email containing a fraudulent invoice through a server located outside the District of New Jersey to Company-1. On the invoice, the description of the services provided was “Provisioning Dispatch Service MARCH-2022 [/] 24 hours a day – 31 days,” and the invoice amount was \$23,436.00.

9. On or about June 7, 2022, Company-2 transmitted an email containing a fraudulent invoice through a server located outside the District of New Jersey to

Company-1. On the invoice, the description of the services provided was “Provisioning Dispatch Service MAY-2022 [/] 24 hours a day – 31 days,” and the invoice amount was \$23,436.00.

10. On or about July 4, 2022, Company-2 transmitted an email containing a fraudulent invoice through a server located outside the District of New Jersey to Company-1. On the invoice, the description of the services provided was “Provisioning Dispatch Service JUNE-2022 [/] 24 hours a day – 30 days,” and the invoice amount was \$22,680.00.

11. In connection with the fraudulent invoices for dispatching services, Company-1 paid Company-2 approximately \$150,000 for services that were never rendered. Co-Conspirator-1, in turn, shared a portion of these fraudulently obtained proceeds with defendant WAJDA.

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

FORFEITURE ALLEGATIONS

12. Upon conviction of the offense charged in this Information, defendant

JAMES WAJDA

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, defendant WAJDA obtained that constituted, or was derived from, proceeds traceable to the commission of the offense, and all property traceable to such property.

13. If any of the above-described forfeitable property, as a result of any act or omission of defendant WAJDA:

- 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 21 U.S.C. § 853(p) (as incorporated by 28 U.S.C. § 2461(c)), to seek forfeiture of any other property of defendant WAJDA up to the value of the forfeitable property.

A handwritten signature in black ink, appearing to read 'Caroline Sadlowski', written over a horizontal line.

CAROLINE SADLOWSKI
Attorney for the United States
Acting under Authority
Conferred by 28 U.S.C. § 515

CASE NUMBER:

25-CR-97

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

UNITED STATES OF AMERICA

v.

JAMES WAJDA

INFORMATION FOR

18 U.S.C. §§ 1343 and 1349

CAROLINE SADLOWSKI

**ATTORNEY FOR THE UNITED STATES
ACTING UNDER AUTHORITY
CONFERRED BY 28 U.S.C. § 515**

KATHERINE J. CALLE

**FRANCESCA LIQUORI
ASSISTANT U.S. ATTORNEYS
NEWARK, NEW JERSEY
973-645-2752**
