

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

UNITED STATES OF AMERICA	:	Hon.
	:	
v.	:	Crim. No.
	:	
AL-TARIK ONQUE	:	18 U.S.C. § 1349
	:	18 U.S.C. § 1346
	:	18 U.S.C. § 1343

I N F O R M A T I O N

The defendant having waived in open court prosecution by Indictment, the United States charges:

1. At times relevant to this Information:
 - a. Defendant Al-Tarik Onque (“ONQUE”) worked as a Senior Aide to the Mayor of Newark. As a Senior Aide to the Mayor, ONQUE primarily responded to constituent complaints, performed constituent services, and worked with organizations in the community.
 - b. Co-Conspirator 1 (“CC-1”) was an expediter on real estate and construction matters in Newark who offered to serve as a liaison between Newark officials and individuals seeking official documents and actions on an expedited basis from Newark officials and agencies.

c. Under City of Newark housing and zoning regulations, a Certificate of Code Compliance (“CCC”) had to be obtained from the Newark Department of Engineering, Office of Inspections and Enforcement prior to any change in occupancy of any unit or premises which was used, partially used, or intended to be used for human occupancy. Newark housing and zoning regulations also required property owners to obtain a Certificate of Occupancy (“CO” or sometimes referred to as “CCO” for Certificate of Continued Occupancy) to ensure that a building or premises satisfied Newark code requirements.

d. The City of Newark had an intangible right to the honest services of its officials. As Newark officials, ONQUE and the employees involved in handling requests for CCCs, COs, and CCOs owed the City of Newark a duty to refrain from seeking, soliciting, demanding, accepting, and agreeing to accept bribes in exchange for their action and assistance as officials for the City of Newark and for their violation of their official duties in connection with the affairs of the City of Newark.

e. Individual-1 was an individual who owned property in Newark, New Jersey.

f. Individual-2 was an individual who owned property in Newark, New Jersey.

2. From in or about January 2020 to in or about December 2022, in Essex County, in the District of New Jersey, and elsewhere, the defendant,

AL-TARIK ONQUE,

and others knowingly and intentionally conspired and agreed to devise a scheme and artifice to defraud the City of Newark of the right to the honest services of ONQUE and the employees involved in handling requests for CCCs, COs, and CCOs, in the affairs of the City of Newark, facilitated by the use of interstate wire communications, contrary to Title 18, United States Code, Sections 1343 and 1346.

Object of the Conspiracy

3. The object of the conspiracy was for ONQUE and others to directly and indirectly seek, solicit, demand, accept, and agree to accept cash bribes from individuals seeking to obtain CCCs, COs, and CCOs from the City of Newark on an expedited basis, in exchange for ONQUE and others obtaining the requested documents from Newark officials or by falsifying previously issued versions of these official documents.

Manner and Means of the Conspiracy

4. It was part of the conspiracy that:

a. ONQUE used his official position with the City of Newark to solicit individuals, including Individual-1 and Individual-2, seeking CCCs, COs, and CCOs issued by the City of Newark in connection with the development, construction, rental, or sale of certain properties, and to offer such individuals the expedited acquisition of these documents in exchange for payments of cash bribes.

b. ONQUE and others induced these individuals to pay cash bribes by making representations that he and others were connected to Newark officials who had the authority and ability to issue the needed CCC, CO, or CCO on an expedited basis.

c. At times, ONQUE coordinated with others, including CC-1, to obtain CCCs, COs, or CCOs on an expedited basis from Newark officials who were involved in issuing such documents. On other occasions, ONQUE coordinated with others, including CC-1, to acquire and produce falsified versions of these official documents.

d. From in or about January 2020 to in or about December 2022, Individual-1 directly or indirectly paid ONQUE to acquire CCOs for certain properties in Newark. For example, in or about 2021, Individual-1 directly or indirectly paid ONQUE or his co-conspirators approximately \$2,000 in cash for a CCO for a property on Bergen Street in Newark. In or about 2021, Individual-1 also directly or indirectly paid ONQUE or his co-conspirators approximately \$2,000 in cash for a CCO for a property on Central Avenue in Newark. In exchange for these payments, ONQUE coordinated with CC-1 to obtain CCOs on an expedited basis for Individual-1, and paid CC-1 for obtaining the expedited CCOs from the Newark officials who could issue the documents.

e. In addition, in or about December 2020, Individual-2 directly or indirectly paid ONQUE to acquire a CCC for a single-family building on Pennsylvania Avenue in Newark (the “Pennsylvania Avenue Property”), that would depict the Pennsylvania Avenue Property as a two-family building. ONQUE

coordinated with CC-1 to obtain the requested CCC. However, unlike prior occasions where, in exchange for a bribe payment, ONQUE obtained an expedited CCC that was actually issued by the City of Newark, ONQUE obtained a falsified version of a CCC from CC-1 that depicted the Pennsylvania Avenue Property as a two-family building and provided this falsified CCC to Individual-2.

f. To effectuate their scheme, ONQUE, CC-1, and others communicated with each other and with individuals seeking CCCs, COs, or CCOs, including Individual-1 and Individual-2, by telephone and text messages. For example, on or about December 30, 2020, ONQUE exchanged text messages with Individual-2 related to a CCC for the Pennsylvania Avenue Property. In addition, from on or about December 30, 2020 to on or about December 31, 2020, ONQUE exchanged text messages with CC-1 related to obtaining a CCC for the Pennsylvania Avenue Property, and the \$3,500 fee that CC-1 would charge for the CCC.

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

FORFEITURE ALLEGATION

1. The allegations contained above are hereby realleged and incorporated by reference for the purpose of noticing forfeiture pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

2. As a result of committing the offense charged in this Information, defendant Al-Tarik Onque (“ONQUE”) 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 constituted or was derived from proceeds traceable to the commission of the offense, which totaled approximately \$5,000.

Substitute Assets Provision

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

- 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 forfeitable property described above.

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United States Deputy Attorney General

Alina Habba /RLW by permission
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Acting United States Attorney
Special Attorney

/s/ Matthew Specht
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FRANCESCA LIQUORI
Assistant United States Attorneys

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District of New Jersey**

UNITED STATES OF AMERICA

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AL-TARIK ONQUE

INFORMATION FOR

18 U.S.C. § 1349

18 U.S.C. § 1346

18 U.S.C. § 1343

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