

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

UNITED STATES OF AMERICA	:	Hon. James B. Clark, III
	:	
v.	:	Mag. No. 26- 12086 (JBC)
	:	
MENASHE DAVIDOVITZ	:	CRIMINAL COMPLAINT
	:	
	:	<u>Filed Under Seal</u>

I, Michael Nicoletti, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

SEE ATTACHMENT A

I further state that I am a Special Agent with the Federal Bureau of Investigation and that this complaint is based on the following facts:

SEE ATTACHMENT B

continued on the attached page and made a part hereof.

s/ FBI Special Agent Michael Nicoletti

Special Agent Michael Nicoletti
Federal Bureau of Investigation

Special Agent Nicoletti attested to this
Complaint by telephone pursuant to FRCP
4.1(b)(2)(A).

Sworn to and subscribed via telephone,
this 16th day of June, 2026

DISTRICT OF NEW JERSEY
County and State

HONORABLE JAMES B. CLARK, III
UNITED STATES MAGISTRATE JUDGE

s/ Hon. James B. Clark, III, U.S.M.J.

Signature of Judicial Officer

ATTACHMENT A

Count 1

Conspiracy to Commit Honest Services Fraud

From in or about June 2024 through in or about November 2024, in the District of New Jersey, the Southern District of New York, and elsewhere, defendant

MENASHE DAVIDOVITZ

did knowingly and intentionally conspire and agree with Co-Conspirator-1, Co-Conspirator-2, and others to devise and execute a scheme and artifice to defraud the City of Newark, New Jersey of the right to the honest services of City of Newark employees, including Co-Conspirator-2, in the affairs of the City of Newark, and to transmit and cause to be transmitted by means of wire, radio, and television communication in interstate and foreign commerce, writings, signs, signals, pictures, and sounds for the purpose of executing such scheme and artifice, contrary to Title 18, United States Code, Sections 1343 and 1346.

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

Count 2
Conspiracy to Commit Bribery

From in or about June 2024 through in or about November 2024, in the District of New Jersey, the Southern District of New York, and elsewhere, defendant

MENASHE DAVIDOVITZ

knowingly and intentionally did conspire and agree with Co-Conspirator-1 and others to corruptly give, offer, and agree to give a thing of value, namely, cash bribes, to agents of the City of Newark, New Jersey, including Co-Conspirator-2, intending to influence and reward such agents, in connection with a business, transaction, and series of transactions of the City of Newark involving a thing of value of \$5,000 and more, contrary to Title 18, United States Code, Section 666(a)(2).

In violation of Title 18, United States Code, Section 371.

Count 3
Conspiracy to Sell False Seals

From in or about October 2021 through in or about January 2023, in the District of New Jersey, the Eastern District of New York, the Southern District of New York, and elsewhere, defendant

MENASHE DAVIDOVITZ

did knowingly and intentionally conspire and agree with others to execute a scheme and artifice to sell, with fraudulent intent, falsely made, forged, and counterfeited United States Department of Homeland Security insignia, contrary to Title 18, United States Code, Section 506(a)(3).

In violation of Title 18, United States Code, Section 371.

Count 4
Conspiracy to Sell Official Insignia

From in or about October 2021 through in or about January 2023, in the District of New Jersey, the Eastern District of New York, the Southern District of New York, and elsewhere, defendant

MENASHE DAVIDOVITZ

did knowingly and intentionally conspire and agree with others to execute a scheme and artifice to sell insignia of the design prescribed by the head of a department or agency of the United States for use by any officer and employee thereof, and any colorable imitation thereof, namely, a United States Department of Homeland Security insignia, without authorization under regulations made pursuant to law, contrary to Title 18, United States Code, Section 701.

In violation of Title 18, United States Code, Section 371.

ATTACHMENT B

I, Michael Nicoletti, a Special Agent with the Federal Bureau of Investigation (“FBI”), having personally participated in an investigation of the conduct of defendant Menashe Davidovitz (“DAVIDOVITZ”) and others, having reviewed, among other materials, law enforcement records and databases, telephone records, electronic communications, and financial records, and having spoken with other law enforcement officers and individuals, have knowledge of the following facts. Because this Complaint is submitted for the limited purpose of establishing probable cause, I have not included all facts known to me concerning this investigation. The contents of documents and the statements and conversations of individuals referenced below are provided in substance and in part, unless otherwise indicated. Where I assert that an event took place on a particular date and time, I am asserting that it took place on or about the date and time alleged. Dollar amounts, and other figures cited herein, are approximations.

Relevant Individuals and Entities

1. At various times relevant to this Criminal Complaint:
 - a. DAVIDOVITZ was a resident of Rockland County, New York, and was involved in acquiring and developing real estate in, among other places, Newark, New Jersey.
 - b. Co-Conspirator-1 (“CC-1”) was formerly employed as a code enforcement officer with the City of Newark’s Office of Inspection and Enforcement.¹ CC-1 served as a liaison between DAVIDOVITZ and City of Newark employees, including Co-Conspirator-2 (“CC-2”), on matters relating to permitting and the issuance of certificates related to real estate development and construction, among other official matters.
 - c. CC-2 was an employee of the City of Newark who was responsible for, among other things, issuing certificates of occupancy (“COs”), which are described in more detail below.
 - d. The City of Newark government received benefits in excess of \$10,000 in relevant one-year periods, within the meaning of Title 18, United States Code, Section 666(d)(5), under Federal programs involving a grant, contract, subsidy, loan, guarantee, insurance, and other forms of Federal assistance, to include funds from programs administered by the Community Planning and Development Division of the United States Department of Housing and Urban Development whose purposes were, among other things, to develop viable urban

¹ Information gathered over the course of the investigation has revealed that, in or around 2025, CC-1 was reappointed as a City of Newark employee.

communities by providing decent housing and a suitable living arrangement and by expanding economic opportunities.

e. Jonathan Ledesma (“Ledesma”)² was a resident of Carteret, New Jersey and was employed as a United States Air Marshal.³ Ledesma was also a registered member/manager for an auto repair limited liability company (the “Ledesma Company”).

f. Co-Conspirator-3 (“CC-3”) was a New Jersey resident and a City of Newark police officer who was an associate of both DAVIDOVITZ and Ledesma.

g. Company-1 was a company in Nutley, New Jersey that sold, among other items, cards to law enforcement officers that the officers could provide to their friends and family (the “Identification Cards”). Individuals purchased the Identification Cards so if they were encountered by law enforcement they could falsely identify themselves as having a relationship with a member of federal law enforcement. These cards were embossed with the name of the law enforcement officer’s agency, and related insignia, and included a “QR code”⁴ that, when scanned, would provide the cellular phone number associated with the officer’s telephone. The Identification Cards included a description of the relationship between the officer and the card’s bearer, such as “family member.” An example of the Identification Cards is included below, with the bearer’s name redacted:

² In 2024, Ledesma pleaded guilty to making false statements, in violation of 18 U.S.C. § 1001(a)(2), and selling official insignia without authorization, in violation of 18 U.S.C. § 701, and was sentenced to three years of probation. *See United States v. Jonathan Ledesma*, Crim. No. 24-458 (GC). These charges related to the sale of cards to law enforcement officers that officers could provide to their friends and family.

³ The Federal Air Marshal service is under the supervision of the Transportation Security Administration of United States Department of Homeland Security (“DHS”).

⁴ A “QR,” or “quick response” code is a two-dimensional matrix barcode which can be read by an imaging device, such as a cellular phone camera.



h. Neither DAVIDOVITZ, Ledesma, nor CC-3 were licensed or permitted to sell items that were embossed with the insignia of DHS.

Object of the Bribery Conspiracy (Counts 1 and 2)

2. It was an object of the conspiracy for DAVIDOVITZ to employ CC-1 as a conduit for the payment of bribes to City of Newark agents, including CC-2, in exchange for the agents' official action in matters related to City of Newark properties owned by DAVIDOVITZ.

Manner and Means of the Bribery Conspiracy

3. It was part of the conspiracy that:

a. DAVIDOVITZ owned and/or managed multiple residential real estate properties in the City of Newark, including a property on Johnson Street (the "Johnson Street Property").

b. CC-1, in exchange for cash and other benefits, coordinated with City of Newark employees, including CC-2, to assist DAVIDOVITZ in, among other things,

obtaining expedited official action to resolve certain issues encountered by DAVIDOVITZ in connection with his real estate holdings. For example, owners of Newark residential properties, such as DAVIDOVITZ, must obtain Certificates of Occupancy, or “COs,” before the property can be occupied or sold. By issuing a CO, the City of Newark confirms that the property complies with local building codes and is suitable for occupancy. COs cannot be issued for properties with outstanding City of Newark violations.

c. On DAVIDOVITZ’s behalf, CC-1 bribed the City of Newark employees, including CC-2, in exchange for their assistance in, among other things, resolving violations at DAVIDOVITZ’s properties and issuing expedited COs.

d. On occasion, DAVIDOVITZ and his co-conspirators took steps to conceal the corrupt nature of these financial transactions. For example, on certain occasions, CC-1 instructed DAVIDOVITZ to send the payments to at least two other individuals, via Zelle⁵ and other electronic payment platforms.

e. DAVIDOVITZ and his co-conspirators used various interstate wire transmissions to further and facilitate their scheme, including but not limited to e-mails and text messages. For example, between on or about August 23, 2024 and on or about August 28, 2024, DAVIDOVITZ and CC-1 exchanged the following text messages, among others, which appeared related to the Johnson Street Property and official action taken by CC-2:

DAVIDOVITZ:	Did you take money out of that TD card?
DAVIDOVITZ:	Also can you get the Johnson violations done today and bring me a printout please?
DAVIDOVITZ:	So I can pay you for that and I can have it because I will need it today later.

DAVIDOVITZ:	U told me I’ll have it in the morning.
DAVIDOVITZ:	U said 25 mins
DAVIDOVITZ:	It’s making me look bad.

⁵ Zelle is a United States-based digital payment network that allows customers to send money directly between almost any U.S. bank accounts, typically within minutes, with just an email address or U.S. mobile phone number.

CC-1: So look I'm about to go in person now and I'm going to take a photo with my phone and I'm going to send it to you as confirmation.

DAVIDOVITZ: Ok

DAVIDOVITZ: But please make sure it's a clear picture.

CC-1: I spoke with her, she needs incentive in order for her to move.

DAVIDOVITZ: So let's go

DAVIDOVITZ: Come on down lol

DAVIDOVITZ: Also, do you have it yet because I gotta start heading back I have a meeting at 3 o'clock

CC-1: She told me to come down and get it once she stamp it.

CC-1: If anything I can meet you near Montville

DAVIDOVITZ: Ok

DAVIDOVITZ: I just wanted to send it to the bank before 2 o'clock but it's already 2 o'clock

DAVIDOVITZ: [Sends his email address]

CC-1: Send me an address

CC-1: I have to bring it to you

CC-1: She doesn't want to go the email route

CC-1: Doesn't want traces

DAVIDOVITZ: It just really sucks. I can't close the loan till next week because I didn't get the paper for them in time

DAVIDOVITZ: I wish we could've gotten it quicker. But it is what it is at this point.

4. In late 2024, during a lawfully recorded conversation with two individuals ("Individual-1" and "Individual-2") DAVIDOVITZ admitted to his participation in the above-described corrupt activity. Specifically, DAVIDOVITZ admitted that he had paid over \$13,000 in bribes in exchange for obtaining official action from City of Newark employees, including \$5,000 in connection with the expedited CO for the Johnson Street Property, which appears to be discussed in the August 2024 text messages between CC-1 and DAVIDOVITZ that are included in Paragraph 3 of this Complaint. Portions of that conversation are detailed below:

INDIVIDUAL-1: Johnson, I think, five grand.

INDIVIDUAL-2: Five grand, full CO? S—t.

DAVIDOVITZ: I sold a few properties that I couldn't sell because I [unintelligible] the permits.

INDIVIDUAL-2: A huh.

DAVIDOVITZ: But she got us, in one day.

INDIVIDUAL-2: Who's that? Do I know her?

DAVIDOVITZ: A lady in, I don't know, I don't know her myself. The guy talks to her, the guy talks to her. I just know it's a her.

INDIVIDUAL-2: Who's the guy? Do I know him? . . .

DAVIDOVITZ: He used to be a CO inspector.

5. The conversation continued, and DAVIDOVITZ explained to Individual-1 that he "[didn't] know his first name ... just we're buddies" and that the process took "a couple days." Based on my training and experience, and the investigation to date, to include the text messages exchanged between DAVIDOVITZ and CC-1, as detailed above, there is probable cause to believe that "the guy" to whom DAVIDOVITZ referred is CC-1 and that the "lady" is CC-2. For

example, I know that an official seal is affixed to all City of Newark COs. Thus, there is probable cause to believe that CC-1 stated that “she” was “stamp[ing] it,” CC-1 was likely referring to CC-2’s affixing the seal to the Johnson Street Property CO.

6. During this lawfully recorded conversation, DAVIDOVITZ also provided Individual-1 with the phone number of a person⁶ that DAVIDOVITZ claimed was an “inspector” and displayed to Individual-1 a photograph, saved to DAVIDOVITZ’s cellular phone, of a “real CO” that cost \$8,000 and that he obtained “within 24 hours.”

Overt Acts

7. In furtherance of the conspiracy and to effect its unlawful object, DAVIDOVITZ and his co-conspirators committed the following acts, among others, in the District of New Jersey and elsewhere:

a. On or about July 11, 2024, CC-1 used a cellular phone to send approximately three screenshots to DAVIDOVITZ’s cellular phone. These screenshots reflected that an inspection for one of DAVIDOVITZ’s properties had occurred and that “everything was abated.” CC-1 also asked DAVIDOVITZ, via an electronic message, “Where am I requesting [the remaining money] from?”

b. In response to CC-1’s question, as set forth in paragraph 7(a) of this Complaint, DAVIDOVITZ responded on or about the same day, via electronic message, “Will have office send.”

c. From on or about August 28, 2024 through on or about September 27, 2024, DAVIDOVITZ used Apple Pay⁷ to send CC-1 and CC-1’s associate payments for CC-1’s role in the conspiracy, as set forth in the following chart:

Approximate Date of Transaction	Recipient	Approximate Amount
August 28, 2024	CC-1	\$400

⁶ A review of the transcript indicates that DAVIDOVITZ may have been referring to CC-1, though the phone number he provided was different than the one known to be associated with CC-1.

⁷ Apple Pay is a mobile payment application that links a person’s Apple devices to a person’s credit or debit card so that they can make secure, contactless purchases and transfer money using an iPhone, Apple Watch, Mac, or iPad.

August 29, 2024	CC-1	\$500
September 2, 2024	CC-1's Associate	\$300
September 8, 2024	CC-1	\$500
September 27, 2024	CC-1	\$450

Overview of the Conspiracy to Sell DHS Insignia (Counts 3 and 4)

8. Law enforcement, including the FBI, has also been investigating the possession of the Identification Cards by residents of New York and New Jersey. The investigation has revealed that Davidovitz, Ledesma, CC-3, and their co-conspirators participated in a scheme to unlawfully sell the Identification Cards.

9. As part of the scheme, from in or about October 2021 through in or about January 2023, Ledesma purchased over 200 Cards from Company-1. Each card cost Ledesma approximately \$19.21.

10. As detailed below, Ledesma, DAVIDOVITZ, and CC-3 then resold these cards, at a substantial profit. The resale of these cards are not authorized by any regulations made pursuant to law.

Goal of the Conspiracy to Sell DHS Insignia

11. It was the goal of the conspiracy for DAVIDOVITZ, Ledesma, CC-3, and their co-conspirators to enrich themselves through the unlawful sale of the Identification Cards.

Manner and Means of the Conspiracy to Sell DHS Insignia

12. The investigation revealed that Ledesma arranged for the sale of certain of the Identification Cards via WhatsApp⁸ and asked the purchasers to electronically transmit their driver's license. For example, in or around July 2022, Ledesma sold one of the Identification Cards to a Brooklyn, New York resident ("Individual-3"). Prior to the sale, Individual-3 transmitted his driver's license to Ledesma via WhatsApp and used Zelle to send \$1,700 to Ledesma's family member, at Ledesma's direction. Individual-3's Identification Card was delivered to

⁸ WhatsApp is an encrypted cellular phone messaging application that allows users to send text, voice, and video messages, make voice and video calls, and share images and other content.

Individual-3 by a yet-unidentified co-conspirator. It was placed inside a credential case marked “Law Enforcement Family Member.” Individual-3 also received two parking placards and a shield that read, “Law Enforcement Family Member.”

13. Records kept by Company-1 revealed the names of some of the bearers of the Identification Cards, including Individual-3. Zelle transactions revealed that the bearers’ payments for many of the Identification Cards were sent to DAVIDOVITZ, via the Zelle account of his family member (the “Zelle Account”), and/or Ledesma.⁹ Examples of Identification Card sales, and related transactions, are included in the following chart:

Approximate Date of Card Purchase	Name of Card Bearer	Approximate Date of Related Financial Transaction(s)	Circumstances of Related Financial Transaction(s), Including Approximate Amount
October 25, 2021	Customer-1	September 27, 2021 October 4, 2021 December 17, 2021	Customer-1 sent \$750 to the Zelle Account Customer-1 sent \$750 to the Zelle Account Customer-1 sent \$1,500 to the Zelle Account
October 25, 2021	Customer-2	September 27, 2021 November 23, 2021	Customer-2’s apparent company sent \$750 to the Zelle Account Customer-2 sent \$750 to the Zelle Account with the related memo, “remaining”
February 2, 2022	Customer-3	February 2, 2022 March 7, 2022	Customer-3 sent \$1,700 to the Zelle Account Customer-3 sent \$200 to the Zelle Account

⁹ The Zelle Account is linked to the email addresses of DAVIDOVITZ and the aforementioned family member and is associated with both of their cellular phone numbers.

Approximate Date of Card Purchase	Name of Card Bearer	Approximate Date of Related Financial Transaction(s)	Circumstances of Related Financial Transaction(s), Including Approximate Amount
February 2, 2022	Customer-4	February 2, 2022	Customer-4 sent \$1,500 to the Zelle Account
April 16, 2022	Customer-5	April 7, 2022	Customer-5 sent \$1,900 to the Zelle Account
May 5, 2022	Customer-6	May 5, 2022 May 8, 2022 May 26, 2022 May 27, 2022	Customer-6 sent \$1,700 to the Zelle Account \$2,000 was transferred from the Zelle Account to a Zelle account associated with Ledesma's family member Customer-6 used Zelle to send Ledesma \$2,000 Customer-6 used Zelle to send Ledesma \$1,800
November 1, 2022	Customer-7	October 31, 2022 November 1, 2022	Customer-7 used Zelle to send \$2,000 to the account associated with the Ledesma Company, with the associated memo, "transmission repair" Customer-7 used Zelle to send \$1,500 to the account associated with the Ledesma Company, with the associated memo, "transmission repair"

14. Further, a review of the Zelle Account records revealed additional payments that were sent to the Zelle Account for what appeared to be the sale of the Identification Cards to individuals who had not been named in the incomplete records of Company-1. On certain occasions, after receiving these funds, the Zelle

Account was used to transfer funds to CC-3’s Zelle account. Examples of these transactions are detailed below:

Approximate Date of Transaction	Circumstances of Transaction	Related Memo
March 15, 2021	Customer-8 sent \$750 to the Zelle Account	750 HS badge
March 22, 2021	Customer-8 sent \$750 to the Zelle Account	750 badge
April 1, 2021	Customer-8 sent \$750 to the Zelle Account	750 Shneur badge
October 26, 2021	Customer-9 sent \$1,500 to the Zelle Account	For the badges
October 27, 2021	\$1,000 was sent from the Zelle Account to CC-3	N/A
November 8, 2021	\$1,000 was sent from the Zelle Account to CC-3	N/A
November 22, 2021	A Zelle account associated with a limited liability company (“LLC”) sent \$1,500 to the Zelle Account	Homeland badge [Customer-10]
November 24, 2021	\$1,000 was sent from the Zelle Account to CC-3	N/A
December 13, 2021	\$1,000 was sent from the Zelle Account to CC-3	N/A
December 14, 2021	Customer-11 sent \$1,500 to the Zelle Account	Badge

15. Moreover, on at least one occasion, after an Identification Card was purchased by Ledesma from Company-1, the Zelle Account was used to send funds to both CC-3 and Ledesma. Specifically, on August 6, 2022, an Identification Card was purchased by Ledesma for Customer-12 and on August 22, 2022, an Identification Card was purchased by Ledesma for Customer-13. On August 9,

2022, the Zelle Account was used to send \$800 to the account associated with the Ledesma Company and on August 11, 2022, the Zelle Account was used to send \$500 to the Ledesma Company. On August 25, 2022, Customer-13 sent \$400, via Zelle, to Ledesma and on August 25, 2022, the Zelle Account was used to send \$1,600 to CC-3. On August 29, 2022, the Zelle Account was used to send \$500 to the Ledesma Company.

16. In total, approximately \$30,000 in Zelle payments were sent to the Zelle Account that appeared to relate to the Identification Card scheme, either by the name of the sender or by the associated Zelle memo.

DAVIDOVITZ's Admissions to His Role in the Conspiracy to Sell DHS Insignia

17. During the aforementioned lawfully recorded conversation with Individual-1 and Individual-2, which were obtained in connection with the bribery scheme, DAVIDOVITZ admitted to his participation in the scheme to sell DHS insignia. Portions of that conversation are detailed below:

DAVIDOVITZ:	But this guy, [CC-3] gave me from another guy that he knew very good [unintelligible]. I was told it was a federal card, it was called Homeland Security.
Individual-2:	No, way.
DAVIDOVITZ:	Yeah, I sold thousands of pieces.
Individual-2:	You sold [unintelligible]?
DAVIDOVITZ:	Yeah, it still works like I used it, uh, two months ago.
Individual-1:	[unintelligible]
Individual-2:	What do you mean? Let me see it.
Individual-1:	Do you have a picture of it? [unintelligible] picture of it.
DAVIDOVITZ:	I have it in my car. I can't get it anymore by the way.
Individual-2:	[unintelligible] what does it do?

DAVIDOVITZ: The guy though that sold it went to ... he got arrested now.

Individual-2: [unintelligible]

DAVIDOVITZ: Cause he was selling too many [unintelligible].

Individual-2: I think [unintelligible].

DAVIDOVITZ: He made a ton of money.

Individual-1: He made a lot.

DAVIDOVITZ: [unintelligible] put in, um, card, um what was it called? "Homeland card," maybe.

Individual-1: The [unintelligible] this or [unintelligible]?

DAVIDOVITZ: Yeah, yeah, I get messages from people every day. "This card saved me." [unintelligible]

Individual-3: [unintelligible]

DAVIDOVITZ: I got I was getting them for three, four hundred bucks. I was selling them for two thousand.

[Unintelligible conversation]

DAVIDOVITZ: I had a barcode with the scanner and...

Individual-2: And it works?

DAVIDOVITZ: It works like magic.

Individual-2: US Department of Homeland Security, wow.

DAVIDOVITZ: It worked everywhere. And anywhere in the world it didn't expire. It's in Florida, then it's in New York ... I used it everywhere. I never got a ticket with this card.

Individual-2: This is the guy who gave it to you? Wow.

DAVIDOVITZ: Jonathan Ledesma Le-le-ledesma.

Individual-2: Huh?

DAVIDOVITZ: That was his name.

Individual-2: Jonathan what?

DAVIDOVITZ: Jonathan Ledensma.

Individual-2: Hm

DAVIDOVITZ: Jonathan [unintelligible].

Individual-2: Oh.

DAVIDOVITZ: That was his name. I have pictures with him but now he's [unintelligible]. He got arrested. Probably gonna [unintelligible].

Individual-2: It was all fake?

DAVIDOVITZ: I don't know if it was fake or he wasn't allowed to [unintelligible], I have no idea. I don't even care because I don't even know ... You see this is him behind. It's on his-it's on his pants...

Individual-2: A huh

DAVIDOVITZ: He's wearing a gun and a badge.

Individual-2: Oh wow.

DAVIDOVITZ: Um.

Individual-3: [unintelligible].

[OVERLAPPING VOICES]

DAVIDOVITZ: IDs I sent this guy. I should probably delete this chat (laughing).

[Speaking in a foreign language]

DAVIDOVITZ: [unintelligible] probably two hundred pieces.

Individual-2: A hundred and eighty pieces?

DAVIDOVITZ: Two hundred at least.

Individual-2: Wow. What did it cost you?

DAVIDOVITZ: It cost me three, four hundred dollars.

Individual-2: And you charge two thousand?

DAVIDOVITZ: Two thousand.

Individual-2: Nice.

DAVIDOVITZ: I was living off it [unintelligible].

Individual-2: Wow.

DAVIDOVITZ: [unintelligible]

Individual-1: [unintelligible]

[OVERLAPPING VOICES]

Individual-2: Only that guy did it or you told me that...?

DAVIDOVITZ: Me and [CC-3] split it whatever like we made [unintelligible] [CC-3] made [unintelligible] and I took the rest, whatever. I split.

18. This conversation demonstrates that DAVIDOVITZ participated in the scheme with CC-3 to sell the Identification Cards purchased by Ledesma – whom DAVIDOVITZ referred to by name – and profited substantially from this scheme. For example, DAVIDOVITZ stated, “I was getting them for three, four hundred bucks. I was selling them for two thousand,” and later explained, “Me and [CC-3] split it whatever like we made.”

Overt Acts

19. In furtherance of the conspiracy and to effect its unlawful object, DAVIDOVITZ and his co-conspirators committed the following acts, among others, in the District of New Jersey and elsewhere:

a. On or about July 12, 2021, DAVIDOVITZ exchanged electronic messages with a prospective purchaser of an Identification Card (“Individual-4”) and Individual-4 asked, “Can I buy 2 badges?” In response, DAVIDOVITZ wrote, “Yes. I’ll call u later for details.”

b. On or about July 15, 2021, DAVIDOVITZ and Individual-4 exchanged additional electronic messages. During this communication, Individual-4 asked, “Hi for 5 pieces can I get a better price?” and DAVIDOVITZ responded, “np” [no problem].

c. On or about January 19, 2022, DAVIDOVITZ received the following electronic message from a prospective purchaser of an Identification Card (“Individual-5”): “Good morning. Am I able to provide a Homeland Security card[?]” DAVIDOVITZ responded, “Very hard to get now I will see what I can do.”

d. Later that same day, DAVIDOVITZ sent the following electronic message to Individual-5: “I could get you one. It will be \$1500 and I will need a picture of your license.”

e. On or about July 4, 2022, DAVIDOVITZ exchanged electronic messages with a prospective purchaser of an Identification Card (“Individual-5”). Individual-6 provided his/her name and stated, “I would like to pick up my wife’s badge please[.] What’s your address?” DAVIDOVITZ responded by providing Individual-5 with his home address.