

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon.  
 :  
 v. : Crim. No. 19-  
 :  
 IBRAHIM ZUGHBI : 7 U.S.C. § 2024(b)  
 : 18 U.S.C. § 1956(a)(1)(B)(i)

INFORMATION

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

1. At various times relevant to this Information:
  - a. Jamaica Meat Market (“JMM”) was a grocery store located in Paterson, New Jersey;
  - b. Defendant Ibrahim Zughbi was the true owner of JMM while his nephew was the listed owner of JMM;
  - c. The Supplemental Nutrition Assistance Program (“SNAP”) was a program funded by the United States government, which provided nutrition assistance to eligible, low-income individuals and families. SNAP was funded by the United States Department of Agriculture.
  - d. Pursuant to the Food Stamp Act of 1977, as amended, 7 U.S.C. §§ 2011-32, and its accompanying regulations, 7 C.F.R. §§ 271-85, eligible low income persons (“SNAP Recipients”) could obtain SNAP benefits loaded onto Electronic Benefits Transfer (“EBT”) cards. SNAP benefits could only lawfully be used to purchase specific food items, and not to purchase prepared

foods, alcoholic beverages, pet food, or other non-food items. SNAP benefits could not lawfully be exchanged for cash.

e. Food retailers, such as JMM, applied for authorization to participate in the SNAP. Once approved to participate in the SNAP as an Authorized Retailer, the Authorized Retailer could redeem purchases of eligible food products by SNAP Recipients. SNAP Recipients completed purchases by swiping an EBT card at an Authorized Retailer's point of sale terminal and entering a PIN. Payments were then transferred from the United States government into a bank account designated by the Authorized Retailer.

2. Since in or around July 2011, JMM was an Authorized Retailer approved to accept SNAP benefits, also commonly referred to as "food stamp" benefits.

3. Beginning at least as early as January 2014 and continuing through in or around January 2018, defendant Ibrahim Zughbi unlawfully redeemed SNAP benefits in exchange for cash.

4. Specifically, defendant Ibrahim Zughbi entered fictitious dollar amounts for allegedly eligible SNAP EBT transactions, provided SNAP Recipients a percentage of the transaction's value in cash, and kept the remainder. For example, a SNAP Recipient might have purchased eligible food items worth approximately \$5.00, but defendant Ibrahim Zughbi debited, for example, approximately \$75.00 from the SNAP Recipient's EBT account, which was then credited to JMM's bank account. Defendant Ibrahim Zughbi then gave the SNAP

Recipient a portion of the overage in cash and kept a portion of the proceeds (not including the cost of store items that were purchased).

**COUNT ONE**  
**(SNAP Benefit Fraud)**

5. From in or around January 2014 through in or around January 2018, in Passaic County, in the District of New Jersey, and elsewhere, the defendant,

IBRAHIM ZUGHBI,

did knowingly use, transfer, acquire and possess Supplemental Nutrition Assistance Program (“SNAP”) benefits having a value of \$5,000 and more in a manner contrary to the provisions of Title 7, United States Code, Chapter 51, and the regulations issued pursuant thereto, that is, the defendant knowingly and unlawfully exchanged SNAP benefits for cash.

In violation of Title 7, United States Code, Section 2024(b).

**COUNT TWO**  
**(Money Laundering)**

6. From in or around January 2014 through in or around January 2018, in Passaic County, in the District of New Jersey and elsewhere, the defendant

IBRAHIM ZUGHBI,

did knowingly and intentionally conduct and attempt to conduct financial transactions affecting interstate and foreign commerce which transactions involved the proceeds of specified unlawful activity, namely, the SNAP benefit fraud charged in Count One, knowing that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, and knowing that the transactions were designed in whole and in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity.

In violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

**FORFEITURE ALLEGATION AS TO COUNT ONE**

1. As a result of committing the food stamps fraud offense in violation of 7 U.S.C. § 2024, as charged in Count One of this Information, the defendant,

IBRAHIM ZUGHBI,

shall forfeit to the United States, pursuant to 7 U.S.C. § 2024(f), all property, real and personal, used in a transaction or attempted transaction, to commit, or to facilitate the commission of, a violation of 7 U.S.C. § 2024(b), and all proceeds traceable to a violation of 7 U.S.C. § 2024(b).

**FORFEITURE ALLEGATION AS TO COUNT TWO**

2. As a result of committing the money laundering offense charged in Count Two of this Information, the defendant,

IBRAHIM ZUGHBI,

shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(1), all property, real or personal, involved in such money laundering offense, and all property traceable to such property.

**Substitute Assets Provision**  
**(Applicable to All Forfeiture Allegations)**

3. 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 21 U.S.C. § 853(p), as incorporated by 28 U.S.C. § 2461(c), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

  
CRAIG CARPENITO  
United States Attorney

CASE NUMBER: \_\_\_\_\_

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

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**UNITED STATES OF AMERICA**

**v.**

**IBRAHIM ZUGHBI**

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**INFORMATION FOR**

7 U.S.C. § 2024(b)(1)  
18 U.S.C. § 1956(a)(1)(B)(i)

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**CRAIG CARPENITO**

*U.S. ATTORNEY  
NEWARK, NEW JERSEY*

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(Ed. 1/97)