UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon.

v. : Criminal No.

KHALED HAMADE : Title 18, United States Code,

Section 1001 and Section 2

INFORMATION

(Making False Statements to Federal Agents)

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

At all times relevant to this Information:

Introduction

- 1. Khaled Hamade (hereinafter, "Hamade") was the manager of a business, (Business-1) located at the Newport Mall, in Jersey City, New Jersey.
- 2. Between at least in or around April 2018 and at least in or around September 2018, Hamade had a business relationship with a financial institution, namely Bank-1, which extended credit to customers of Business-1.
- 3. On or about March 6, 2019, Hamade was interviewed by Special Agents of the Federal Bureau of Investigation and Special Agents of the Department of Labor (collectively, the "Federal Agents"), regarding their investigation into fraud against Bank-1 by certain customers of Business-1. During the interview, Hamade made materially false statements to the Federal Agents regarding the identities of one or more Business -1 customers who were believed to have defrauded Bank-1.
- 4. On or about November 21, 2019, Hamade was re-interviewed by the Federal Agents regarding their ongoing investigation into fraud at Bank-1. During that second interview, Hamade admitted that he had previously

provided, in whole or in part, materially false information regarding the identities of Business-1 customers believed to have defrauded Bank-1.

5. Between on or about March 6, 2019 and on or about November 21, 2019, in the District of New Jersey and elsewhere, the defendant,

KHALED HAMADE,

in a matter within the jurisdiction of the executive branch of the United States, namely, during an ongoing federal investigation by the Federal Bureau of Investigation and the United States Department of Labor, did knowingly and willfully make materially false, fictitious, and fraudulent statements and representations to Federal Agents by denying familiarity with the identities of certain of Business-1's customers suspected of defrauding Bank-1.

In violation of Title 18, United States Code, Section 1001 and Section 2.

RACHAEL A. HONIG
Acting United States Attorney

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18 U.S.C. Sections 1001 & 2

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