

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

UNITED STATES OF AMERICA : Hon.
 :
 v. : Criminal No. 22-
 :
 :
 :
 KHAORI MONROE : 18 U.S.C. § 1343

INFORMATION

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

BACKGROUND

1. At various times relevant to this Information:
 - a. Defendant KHAORI MONROE was employed as a mail carrier with the United States Postal Service at a location in Newark, New Jersey.
 - b. On or about March 27, 2020, the Coronavirus Aid, Relief, and Economic Security Act (the “CARES Act”) was signed into law. The CARES Act created a new temporary federal unemployment insurance program called Pandemic Unemployment Assistance (“PUA”). PUA provided unemployment insurance benefits (“UIBs”) for individuals who were not eligible for other types of unemployment (e.g., the self-employed, independent contractors, gig economy workers). The CARES Act also created a new temporary federal program called Federal Pandemic Unemployment Assistance (“FPUC”) that provided an additional \$600 weekly benefit to those eligible for PUA and regular UIBs.

c. Subject to certain eligibility requirements, a person who was unemployed, but who used to be employed by an employer in a given state could apply to receive UIBs from that state.

d. Each state administered the above UIB programs through a State Workforce Agency (“SWA”). When a SWA approved a UIB application, the SWA caused money to be transferred to the applicant, often by causing a credit/debit card to be mailed to the address requested by the applicant.

2. From at least in or around August 2020 through in or around September 2020, in the District of New Jersey and elsewhere, the defendant,

KHAORI MONROE,

did knowingly and intentionally devise and intend to devise a scheme and artifice to defraud and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, and, for the purpose of executing and attempting to execute such scheme and artifice to defraud, did transmit and cause to be transmitted by means of wire communications in interstate and foreign commerce, certain writings, signs, signals, pictures, and sounds, including a wire communication from inside of New Jersey to outside of New Jersey, as more fully set forth below.

GOAL OF THE SCHEME TO DEFRAUD

3. The goal of the scheme and artifice to defraud was for MONROE and others to enrich themselves by obtaining money by using stolen UIB credit/debit cards.

MANNER AND MEANS OF THE SCHEME TO DEFRAUD

4. It was part of the scheme and artifice to defraud that:
 - a. MONROE and others stole credit/debit cards containing UIBs from a United States Postal Service location in Newark, New Jersey.
 - b. MONROE and others activated these cards by, among other things, calling to activate the cards, including a July 31, 2020, telephone call from a location inside of New Jersey to a location outside of New Jersey.
 - c. MONROE and others then used the cards to obtain money.
 - d. MONROE and others obtained more than \$40,000 through their activity.

5. On or about July 31, 2020, for the purpose of executing the scheme and artifice to defraud, in the District of New Jersey and elsewhere, the defendant,

KHAORI MONROE,

knowingly and intentionally transmitted and caused to be transmitted by means of wire communication in interstate and foreign commerce, certain writings, signs, signals, pictures, and sounds, namely a telephone call from a location in New Jersey to a location outside of New Jersey.

In violation of Title 18, United States Code, Section 1343.

FORFEITURE ALLEGATION

1. The allegations contained in this Information are incorporated by reference as though set forth in full herein for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c).

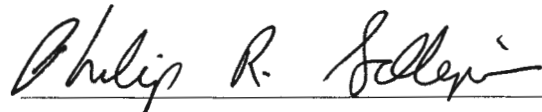
2. Upon conviction of the offense charged in this Information, the government will seek forfeiture from defendant MONROE, in accordance with Title 28, United States Code, Section 2461(c), and Title 18, United States Code, Section 981(a)(1)(C), of any and all property, real or personal, that constitutes or is derived from proceeds traceable to the violation of Title 18, United States Code, Section 1343.

Substitute Assets Provision

3. If by any act or omission of defendant MONROE any of the property subject to forfeiture herein:

- 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 subdivided 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 defendant MONROE up to the value of the property described in this forfeiture allegation.

A handwritten signature in black ink, reading "Philip R. Sellinger". The signature is written in a cursive style with a horizontal line underneath it.

PHILIP R. SELLINGER
UNITED STATES ATTORNEY