

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA	:	Hon.
	:	
v.	:	Criminal No. 17-
	:	
JEFFREY HALPERN	:	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 Acting United States Attorney for the District of New Jersey, charges:

1. At all times relevant to this Information:
  - a. Defendant JEFFREY HALPERN owned and operated JCK Marketing, a consulting company based in East Rockaway, New York.
  - b. "Victim A" was an individual and a resident of New Jersey.
  - c. "Property A" was property owned by Victim A, located in Keansburg, New Jersey.
  - d. "Financial Institution A" was a financial institution and mortgage lender headquartered in Charlotte, North Carolina, with offices located in New Jersey and elsewhere.

**The Scheme to Defraud**

2. From in or about February 2010 through in or about January 2014, in the District of New Jersey and elsewhere, defendant

**JEFFREY HALPERN**

did knowingly and intentionally devise a scheme and artifice to defraud Victim

A, and others, and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises.

**Purpose of the Scheme to Defraud**

3. The purpose of the scheme and artifice to defraud was for defendant JEFFREY HALPERN to obtain money and property by fraudulently billing individuals for services in connection with obtaining loan modifications of their residential mortgages when such services were not actually provided.

**Manner and Means of the Scheme to Defraud**

4. It was part of the scheme and artifice to defraud that defendant JEFFREY HALPERN represented to Victim A and other individuals that defendant JEFFREY HALPERN was negotiating a loan modification of their residential mortgages, including the mortgage on Victim A's property located in New Jersey, with Financial Institution A and other financial institutions.

5. It was further part of the scheme and artifice to defraud that defendant JEFFREY HALPERN communicated with the holders of mortgage loans regarding purported loan modifications, including text messages with Victim A located in New Jersey.

6. It was further part of the scheme and artifice to defraud that defendant JEFFREY HALPERN collected from Victim A and other individuals money in connection with the purported loan modification, which defendant JEFFREY HALPERN characterized as bank fees associated with such loan modification. In fact, the financial institutions, including Financial Institution A, did not charge any fees in connection with loan modifications.

7. It was further part of the scheme and artifice to defraud that neither defendant JEFFREY HALPERN nor his company, JCK Marketing, performed any actual services in connection with the purported loan modifications.

8. As a result of the scheme, defendant JEFFREY HALPERN caused victims to suffer losses of approximately \$411,005, including approximately \$65,720 of loss to Victim A.

9. On or about January 31, 2012, in the District of New Jersey and elsewhere, for the purpose of executing and attempting to execute this scheme and artifice to defraud, defendant

**JEFFREY HALPERN**

did knowingly and intentionally transmit and cause to be transmitted by means of wire communications in interstate and foreign commerce, certain writing, sign, signal, picture, and sound, namely, a text message to Victim A, providing Victim A with defendant JEFFREY HALPERN's bank account information, and demanding that Victim A deposit approximately \$2,500 into defendant JEFFREY HALPERN's bank account.

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.

2. Upon conviction of the offense charged in this Information, the government will seek forfeiture from defendant JEFFREY HALPERN, 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 alleged in this information.

3. If by any act or omission of defendant JEFFREY HALPERN 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 JEFFREY HALPERN up to the value of the property described in this forfeiture allegation.

  
WILLIAM E. FITZPATRICK  
Acting United States Attorney

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**INFORMATION FOR**

18 U.S.C. § 1343

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**WILLIAM E. FITZPATRICK**

*ACTING U.S. ATTORNEY*

*NEWARK, NEW JERSEY*

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**SAMMI MALEK**

*ASSISTANT U.S. ATTORNEY*

*(973) 645-2919*

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