

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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INFORMATION

UNITED STATES OF AMERICA

20 Cr. \_\_\_\_ (RMB)

- v. -

HICHAM KABBAJ,

Defendant.

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COUNT ONE  
(Wire Fraud)

The United States Attorney charges:

1. From at least in or about August 2015 up to and including at least in or about May 2019, in the Southern District of New York and elsewhere, HICHAM KABBAJ, the defendant, willfully and knowingly, having devised and intending to devise a scheme and artifice to defraud, and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises, did 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, to wit, in order to cause a company ("Company-1") to pay fraudulent invoices that KABBAJ submitted to Company-1 for goods and services that were not provided by the purported third party vendor, and in connection

therewith and in furtherance thereof, KABBAJ transmitted and caused to be transmitted interstate electronic messages that were routed through servers located outside New York State and accessed by KABBAJ and others in New York, New York.

(Title 18, United States Code, Sections 1343 and 2.)

**FORFEITURE ALLEGATIONS**

2. As a result of committing the offense alleged in Count One of this Information, HICHAM KABBAJ, the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28 United States Code, Section 2461(c), any and all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of said offense, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense and the following specific property:

- a. 7729 Eden Ridge Way, Palm Beach Gardens, Florida 33412, and
- b. 663 Lakeshore Drive, Hewitt, New Jersey 07421.

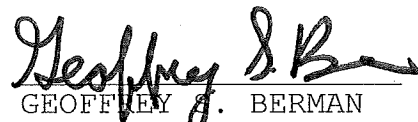
**Substitute Assets Provision**

3. If any of the above-described forfeitable property, 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 person;
- 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) and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Section 981;  
Title 18, United States Code, Section 982;  
Title 21, United States Code, Section 853; and  
Title 28, United States Code, Section 2461.)

  
GEOFFREY J. BERMAN  
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

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(18 U.S.C. §§ 1343 and 2.)

GEOFFREY S. BERMAN  
United States Attorney.

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