

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Criminal No. 10-
v. : 18 U.S.C. § 1956(h)
SHIMON HABER : I N F O R M A T I O N

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

Conspiracy to Launder Money to Conceal
and Promote Unlawful Activity

1. At all times relevant to this Information:
 - a. Defendant SHIMON HABER was a real estate developer, who worked in New York and New Jersey. Defendant SHIMON HABER did not hold a license to transmit or remit money with the New Jersey Department of Banking and Insurance and the New York State Department of Banking.
 - b. Moshe Altman, a/k/a "Michael Altman," (hereinafter "Altman") was a real estate developer based in Hudson County.
 - c. Itzak Friedlander, a/k/a "Isaac Friedlander," (hereinafter "Friedlander") was a business partner of Altman and an employee of Altman's real estate development company.

d. Neither Altman nor Friedlander held a license to transmit or remit money with the New Jersey Department of Banking and Insurance and the New York State Department of Banking.

e. There was a cooperating witness (the "CW") who had been charged with bank fraud in a federal criminal complaint in May 2006. Thereafter, for the purposes of an investigation conducted by the Federal Bureau of Investigation ("FBI"), the CW posed as a real estate developer interested in development in the greater Union City area. The CW represented that he did business in numerous states, including New York and New Jersey, and that the CW paid for goods and services in interstate commerce.

f. At the FBI's direction, the CW represented to defendant SHIMON HABER, Altman, and Friedlander that the CW was (i) holding proceeds of the above-mentioned bank fraud, (ii) concealing those proceeds and other assets from a federal bankruptcy trustee, and (iii) seeking to launder those secret proceeds and assets for the purpose of making corrupt cash payments and political contributions to public officials in exchange for their official assistance in obtaining local government approvals for real estate development projects in New Jersey.

2. On or about March 6, 2007, in Union City, New Jersey, defendant SHIMON HABER met Altman, Friedlander, and the CW at

Altman's office. During this meeting, defendant SHIMON HABER advised the CW that Altman could attempt to make corrupt cash payments on the CW's behalf to public officials in Union City in exchange for their official assistance in obtaining approvals for defendant SHIMON HABER's and the CW's proposed real estate development project in Union City. Defendant SHIMON HABER also advised the CW that for the purpose of making those corrupt cash payments, Altman could "clean things also," in reference to Altman's ability to launder the CW's purported proceeds from the CW's bank fraud and bankruptcy fraud. Altman confirmed his ability to launder the CW's proceeds, stating that he used overseas "converters."

3. On or about March 28, 2007, in Union City, defendant SHIMON HABER met with Altman and the CW at Altman's office. During this meeting, defendant SHIMON HABER and the CW negotiated the terms of the money laundering arrangement with Altman. Altman advised the CW that the CW should send CW's purported fraudulent proceeds to an entity called Gmach Shefa Chaim ("G.S.C."), and that it would take one to two weeks to launder the CW's money.

4. Pursuant to this agreement, on or about May 21, 2007, the CW met with Altman at Altman's office in Union City. At this meeting, Altman accepted a check from the CW for \$18,000 payable to G.S.C., proceeds of which the CW represented were from bank fraud and to be concealed from the bankruptcy trustee.

5. On or about June 12, 2007, the CW met with Altman at Altman's office in Union City. At this meeting, Altman handed the CW approximately \$15,300 in cash in exchange for the above-mentioned \$18,000 check payable to G.S.C. The difference of approximately \$2,700 in monies returned to the CW reflected a 15 percent laundering fee that Altman charged the CW.

6. On or about August 10, 2007, defendant SHIMON HABER met with Altman and the CW at Altman's office in Union City. At this meeting, defendant SHIMON HABER told the CW that the CW needed to make a political contribution of at least \$4,000 to the political committee of a Union City official ("Union City Official") in order to procure official approvals for a real estate project in Union City, in which both defendant SHIMON HABER and the CW were investment partners. The CW stated to defendant SHIMON HABER and Altman that the CW would make the political contribution with monies concealed from the federal bankruptcy trustee. Defendant SHIMON HABER then advised the CW that the CW should make the political contribution through an entity similar to, or including, G.S.C.; whereafter Altman would then make a

contribution to the Union City Official's political committee through such entity.

7. On or about August 16, 2007, defendant SHIMON HABER met with Altman and the CW at Altman's office in Union City. At this meeting, Altman accepted from the CW a check for \$6,000 payable to G.S.C., which Altman, in turn, caused to be deposited in a G.S.C. account at Valley National Bank for the purpose of funding a political contribution to the Union City Official's political committee.

8. On or about August 23, 2007, at Altman's office in Union City, Altman explained to the CW that Altman had structured the CW's \$6,000 check payable to G.S.C. into three separate \$2,000 checks, each payable from a different limited liability company under Altman's control to the Union City Official's political committee. Altman further represented to the CW that Altman was in contact with the Union City Official regarding further contributions.

9. The checks accepted by Altman during the transactions set forth in this Information were deposited in accounts at Valley National Bank, which was a financial institution engaged in interstate commerce.

10. From in or about March 2007 to in or about August 2007, in Hudson County, in the District of New Jersey, and elsewhere, defendant

SHIMON HABER

knowingly, willfully, and with intent to conceal and disguise the nature, location, source, ownership, and control of property believed to be the proceeds of specified unlawful activity, that is, bank fraud proceeds and monies concealed from a federal bankruptcy trustee, and to promote the carrying out of a specified unlawful activity, that is, bribery, conspired and agreed with others to conduct financial transactions affecting interstate commerce and involving the use of a financial institution engaged in interstate commerce, involving property represented to be the proceeds of specified unlawful activity and property used to conduct or facilitate specified unlawful activity, contrary to Title 18, United States Code, Section 1956(a)(3).

In violation of Title 18, United States Code, Section 1956(h).

PAUL J. FISHMAN
UNITED STATES ATTORNEY