UNITED STATES DISTRICT COURT DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA,

INFORMATION

Plaintiff.

18 U.S.C. § 371

v.

BEKAM ADDISSU MERDASSA,

RECEIVED

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Defendant.

THE UNITED STATES ATTORNEY CHARGES THAT:

CLERK U.S. DISTRICT COURT MINNEAPOLIS, MINNESOTA

Count 1

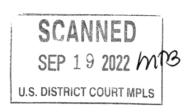
(Conspiracy to Commit Wire Fraud)

1. From in or about December 2020 through in or about January 2022, the defendant,

BEKAM ADDISSU MERDASSA

conspired with others known and unknown to devise a scheme and artifice to defraud and to obtain money by materially false and fraudulent pretenses, representations, and promises, and for the purpose of executing such scheme and artifice, transmitted or caused to be transmitted writings, signs, signals, pictures, or sounds by means of wire, radio, or television communication in interstate or foreign commerce, in violation of Title 18, United States Code, Sections 371 and 1343.

2. As part of the fraudulent scheme, BEKAM MERDASSA conspired with others to participate in a fraudulent scheme to obtain and misappropriate millions of



dollars in Federal Child Nutrition Program funds that were intended as reimbursements for the cost of serving meals to underprivileged children.

- 3. As part of the fraudulent scheme, BEKAM MERDASSA and his co-conspirators Abdul Ali and Yusuf Ali ran a Federal Child Nutrition Program site called Youth Inventors Lab.
- 4. BEKAM MERDASSA established Youth Inventors Lab in March 2017 as a non-profit entity. Between March 2017 through in or around December 2020, there was essentially no business activity with Youth Inventors Lab.
- 5. Abdul Ali approached BEKAM MERDASSA in or about December 2020 with the idea of using Youth Inventors Lab to act as a purported distribution site to receive funds from the Federal Child Nutrition Program. In January 2020, BEKAM MERDASSA, Abdul Ali, and Yusuf Ali submitted an application to Feeding Our Future for Youth Inventors Lab to participate in the federal food program at a site located at 2434 University Avenue West in St. Paul, Minnesota.
- 6. The site purported to serve thousands of meals to children a day, seven days a week. During the seven-month period between December 2020 through June 2021, BEKAM MERDASSA, along with co-conspirators Abdul Ali and Yusuf Ali, claimed to have served more than 1.3 million meals at the Youth Inventors Lab site. Youth Inventors Lab claimed that it received prepared meals and food to distribute from S & S Catering. However, in reality, Youth Inventors Lab served only a fraction of these meals and did not receive any food from S & S Catering. In support of these

claims, BEKAM MERDASSA, along with co-conspirators Abdul Ali and Yusuf Ali,

prepared and submitted fraudulent meal counts, attendance rosters, and invoices.

7. Based on these claims, BEKAM MERDASSA, along with co-conspirators

Abdul Ali and Yusuf Ali, received \$3,029,786 million in Federal Child Nutrition

Program funds.

FORFEITURE ALLEGATIONS

8. If convicted of Count 1 of this Information, 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 property, real or personal, which

constitutes or is derived from proceeds traceable to Count 1 of the Information.

9. If any of the above-described forfeitable property is unavailable for

forfeiture, the United States intends to seek the forfeiture of substitute property as

provided for in Title 21, United States Code, Section 853(p) as incorporated by Title

28, United States Code, Section 2461(c).

All in violation of Title 18, United States Code, Section 371 and 1343.

Dated: September 19, 2022

ANDREW M. LUGER United States Attorney

/s/ Harry M. Jacobs
JOSEPH H. THOMPSON
HARRY M. JACOBS
MATTHEW S. EBERT
CHELSEA A. WALCKER
JOSEPH S. TEIRAB
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