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

UNITED STATES OF AMERICA : HON. JAMES B. CLARK, III
: :
v. : Mag. No. 21-12268 (JBC)
: :
MOHAMED KAMARA : **CRIMINAL COMPLAINT**

I, Laura Ahlert, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

SEE ATTACHMENT A

I further state that I am a Special Agent with the Federal Bureau of Investigation, and that this complaint is based on the following facts:

SEE ATTACHMENT B

continued on the attached page and made a part hereof.

Laura Ahlert Special Agent
Federal Bureau of Investigation

Special Agent Ahlert attested to this Complaint by telephone pursuant to FRCP 4.1(b)(2)(A), on the 14th day of June, 2021.

HONORABLE JAMES B. CLARK, III
UNITED STATES MAGISTRATE JUDGE



Signature of Judicial Officer

ATTACHMENT A

From in or about March 2020 through April 2021, in Mercer County, in the District of New Jersey and elsewhere, defendant

MOHAMED KAMARA

did 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 transfer sent on or about June 1, 2020, from a location in Maryland to a location in New Jersey.

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

ATTACHMENT B

I, Laura Ahlert, am a Special Agent with the Federal Bureau of Investigation. I am familiar with the facts set forth herein based on my own investigation, my conversations with other law enforcement officers, and my review of reports, documents, and other evidence. Because this Complaint is being submitted for a limited purpose, I have not set forth each and every fact that I know concerning this investigation. Where statements of others are related herein, they are related in substance and in part unless otherwise indicated. Where I assert that an event took place on a particular date, I am asserting that it took place on or about the date alleged.

I. Background Information

A. *The Economic Injury Disaster Loan Program*

1. The Coronavirus Aid, Relief, and Economic Security (“CARES”) Act was a federal law enacted in or around March 2020 that was designed to provide emergency financial assistance to Americans suffering the economic effects of the COVID-19 pandemic. The CARES Act enabled the Small Business Association (“SBA”) to offer funding through the COVID-19 Economic Injury Disaster Loans (“EIDL”) program to business owners negatively affected by the COVID-19 pandemic. The EIDL program provided low-interest financing and grants to small businesses, renters, and homeowners in regions affected by declared disasters, like the COVID-19 pandemic.

2. To obtain an EIDL, a qualifying business applied to the SBA and provided certain information about its operations through an online portal. The EIDL approval process required applicants to supply minimal eligibility documentation and to affirm that the information in the application was true and correct under the penalty of perjury and applicable criminal statutes. The amount of an EIDL was based, in part, on the information provided by the applicant—primarily, gross revenue minus cost of goods sold, divided by two. The maximum loan amount was capped at \$150,000 per entity. Qualifying entities could use EIDL funds only on certain expenses, including fixed debts, payroll, and accounts payable.

B. *Unemployment Insurance Benefits*

3. Unemployment Insurance (“UI”) was a state-federal program that provided unemployment insurance benefits (“UIBs”) to eligible workers who were unemployed through no fault of their own. Each state administered its UIB program through a designated state workforce agency (“SWAs”) subject to federal laws and regulations and that typically set additional state-specific

requirements for eligibility, benefit amounts, and duration of payments. Generally, UIB amounts were based on a percentage of earnings over a fixed period. The SWA for the State of New Jersey was the New Jersey Department of Labor (“NJ DOL”), which administers an online portal for collecting UIB applications.

II. The Investigation

EIDL 1

4. On or about April 26, 2020, the SBA received an EIDL application purporting to be from Company 1. On or about June 17, 2020, the SBA approved an approximately \$149,900 EIDL to Company 1 (“EIDL 1”). A representative of Company 1 later told law enforcement, in substance and in part, that Company 1 did not apply for or authorize anyone to apply for EIDL 1.

5. The entire amount of EIDL 1 was transferred into a bank account (“Bank Account 1”). Records reveal that: (a) Bank Account 1 was opened on or about June 4, 2020; and (b) the only three deposits into Bank Account 1 were the initial deposit when the account was opened (of approximately \$100), a deposit of approximately \$40, and the \$149,990 transfer associated with EIDL 1.

6. According to documents obtained for Bank Account 1, the account is in the name of an individual (“Individual 1”). Individual 1 told law enforcement, in substance and in part, that Individual 1 did not open or authorize anyone to open Bank Account 1. Surveillance records for Bank Account 1 also reveal that an individual who is not Individual 1 was responsible for opening Bank Account 1 using a fraudulent Ohio driver’s license.

7. On or about September 9, 2020, approximately \$112,000 was transferred from Bank Account 1 to another bank account (“Bank Account 2”). The listed account holder for Bank Account 2 (“Individual 2”) told law enforcement, in substance in part, that Individual 2 did not open or authorize anyone to open Bank Account 2. The investigation further revealed that the address listed for the account does not exist and that the driver’s license used to open the account was fraudulent.

8. On or about September 30, 2020, defendant MOHAMED KAMARA (“KAMARA”) deposited a check in the amount of approximately \$30,000, which was drawn on Bank Account 2, into a bank account opened in the name of defendant KAMARA (“Bank Account 3”). Defendant KAMARA provided a location in Maryland in connection with Bank Account 3 (“Location 1”).

9. On or about October 1, 2020, defendant KAMARA deposited a check in the amount of approximately \$70,000, which was drawn on Bank Account 2, into Bank Account 3.

10. A review of bank records for Bank Account 3 revealed numerous personal expenditures out of Bank Account 3.

EIDL 2

11. On or about March 24, 2020, the SBA received an EIDL application purporting to be from Company 2. On or about July 14, 2020, the SBA approved an approximately \$149,900 loan to Company 2 ("EIDL 2"). On or about July 14, 2020, the SBA caused approximately \$149,900 to be transferred into a bank account ("Bank Account 4"). A representative of Company 2 told law enforcement, in substance and in part, that Company 2 did not apply for or authorize anyone to apply for EIDL 2.

12. Bank records revealed that, on or about April 24, 2020, an individual ("Individual 3") opened Bank Account 4. Bank records further demonstrate that prior to the July 14, 2020 deposit discussed in paragraph 11, the balance for Bank Account 4 was approximately \$170. In addition, bank records reveal that the sole deposit into Bank Account 4 during the month of July 2020 was the deposit discussed in paragraph 11.

13. On or about July 17, 2020, defendant KAMARA deposited a check in the amount of approximately \$15,000, which was drawn on Bank Account 4, into Bank Account 3.

EIDLs 3-5

14. On or about March 24, 2020, the SBA received an EIDL application purporting to be from Company 3. On or about July 7, 2020, the SBA approved a loan in the amount of approximately \$149,900 ("EIDL 3"). A representative of Company 3 told law enforcement, in substance and in part, that Company 3 did not apply for or authorize anyone to apply for EIDL 3.

15. On or about March 28, 2020, the SBA received an EIDL application purporting to be from Company 4. On or about July 6, 2020, the SBA approved a loan in the amount of approximately \$30,000 ("EIDL 4").

16. On or about June 29, 2020, the SBA received an EIDL application purporting to be from Company 5. On or about July 7, 2020, the SBA approved a loan in the amount of approximately \$149,9000 ("EIDL 5"). The individual identified as the purported owner of Company 5 in the loan application told law enforcement, in substance and in part, that Company 5 does not exist and that

Company 5 did not apply for or authorize anyone to apply for EIDL 5.

17. Proceeds from EIDLs 3-5 were transferred into one bank account ("Bank Account 5"). The driver's license used to open Bank Account 5 was fraudulent.

18. On or about July 9, 2020, defendant KAMARA deposited a check in the amount of approximately \$30,000, which was drawn on Bank Account 5, into Bank Account 3.

EIDL 6

19. On or about June 25, 2020, the SBA received an EIDL application purporting to be from Company 6. The SBA thereafter approved a loan for approximately \$149,900 ("EIDL 6"). On or July 6, 2020, the SBA caused a wire transfer in the amount of approximately \$149,900 to be sent to a bank account ("Bank Account 6").

20. On or about July 9, 2020, an individual attempted to deposit a \$145,000 check drawn on Bank Account 6 ("Check 1") into another bank account ("Bank Account 7") in the name of an entity ("Entity 1"). Check 1 was made out to Entity 1. According to bank records for Bank Account 7, defendant KAMARA was the sole signatory for Bank Account 7 and was listed as a member of Entity 1. The funds associated with Check 1 were returned to Bank Account 6 on or about July 13, 2020, because the SBA transfer associated with EIDL 6 had not yet cleared into Bank Account 6.

UNEMPLOYMENT INSURANCE BENEFITS

21. Between on or about January 1, 2020 and on or about September 7, 2020, an IP address ending in 143 ("the 143 IP Address") was used to submit approximately fifty UIB applications for approximately forty-two individuals to NJDOL's online portal (the "UIB Applications"). After processing the UIB Applications, NJDOL authorized benefits in the total amount of approximately \$163,000. Between on or about January 1, 2020, and on or about September 30, 2020, the 143 IP Address was subscribed to defendant KARAMA at Location 1.

22. Law enforcement interviewed seven individuals whose names were used on the UIB Applications, each of whom said, in substance and in part, that he or she did not make or authorize a UIB Application in his or her name and did not know defendant KAMARA.

23. Law enforcement also determined that one individual whose name was used on one of the UIB Applications had died prior to its submission.

24. Between on or about January 1, 2020 and on or about September 30, 2020, the 143 IP Address also was used to access numerous accounts that received funds as a result of UIB applications submitted to NJDOL from other IP addresses. In total, those account received approximately \$34,000 in UIBs.