

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon. William H. Walls
 :
 v. : Crim. No. 09-926 (WHW)
 :
 ROSA BLAKE : 18 U.S.C. §§ 1343, 912,
 a/k/a "Mafalda" : 1957 & 2
 a/k/a "Rosa Vareiro" :

S U P E R S E D I N G I N D I C T M E N T

The Grand Jury, in and for the District of New Jersey,
sitting at Newark, charges:

COUNTS ONE THROUGH SIX
(Wire Fraud)

1. At all times relevant to this Indictment, defendant ROSA BLAKE, a/k/a "Mafalda," a/k/a "Rosa Vareiro," was a resident of New Jersey. At no time relevant to this Indictment was defendant BLAKE an employee of the United States government.

2. From in or about May 2004 through in or about April 2009, defendant

ROSA BLAKE,
a/k/a "Mafalda,"
a/k/a "Rosa Vareiro,"

knowingly devised and executed a scheme and artifice to defraud and to obtain money and property by means of false and fraudulent pretenses, representations, and promises, which scheme is described below.

Object of the Scheme

3. The object of the scheme was for defendant BLAKE to defraud dozens of victims of at least seven hundred thousand dollars by falsely representing to her victims that she worked or had worked for the federal government and could, for a fee of thousands of dollars per victim, approve, assist in the approval of, or expedite the victims' immigration paperwork, including permanent residency documents (commonly known as "green cards") and employment authorization documents.

Manner and Means of the Scheme

4. Defendant BLAKE would target victims who required official government action to acquire more permanent legal status in the United States than they possessed.

5. Defendant BLAKE would falsely represent to her victims that she was or had been an official employed by the federal government and was invested with the power to influence official immigration decisions, including to provide the "services" described in paragraph 3 above.

6. Defendant BLAKE would falsely represent to a number of her victims, in sum and substance, that the "services" defendant BLAKE was purportedly providing were completely legal.

7. Defendant BLAKE would falsely represent to her victims, in sum and substance, that her status as a federal official provided her with special access to applications for

employment authorization documents and green cards, and that she could influence the processes by which these applications were approved.

8. Defendant BLAKE would often instruct her victims to meet defendant BLAKE at defendant BLAKE's home, where defendant BLAKE would take the victims' identification papers. The victims' identification papers would often contain the victims' personal information, including addresses, dates of birth, names of the victims' children and other relatives, and other sensitive information.

9. Defendant BLAKE received payment from her victims for her "services." Often this payment was made in cash at defendant BLAKE's home. Other times defendant BLAKE directed her victims to wire payment to her in or around Atlantic City, New Jersey. In yet other instances, defendant BLAKE directed her victims to wire payment to a bank account in or around Portugal that defendant BLAKE controlled.

10. Defendant BLAKE would sometimes show her victims official-looking papers, with what appeared to be letterhead and insignias of federal immigration authorities, and would have the victims sign the papers. Defendant BLAKE did not permit her victims to retain or to make copies of these papers.

11. Defendant BLAKE would falsely represent to a number of her victims, in sum and substance, that within several

months, they would receive employment authorization documents in the mail, followed thereafter by green cards.

12. During her meetings with some of her victims, defendant BLAKE would wear what appeared to be official government credentials around her neck.

13. Defendant BLAKE did not actually seek to further her victims' status in the United States and merely kept their money for her own personal use.

14. Defendant BLAKE would often threaten victims who contacted defendant BLAKE when they had not received any immigration documents, and would tell them, among other things and in sum and substance, that:

a. defendant BLAKE's purported position as a United States government official gave defendant BLAKE the power to have the victims deported at any time, even in the middle of the night;

b. defendant BLAKE was a dangerous person;

c. defendant BLAKE knew her victims' personal information and therefore knew where they lived and who their relatives were;

d. the victims would never see their children again once the victims were deported; and

e. because the victims were illegal immigrants, they could not stop defendant BLAKE from having the victims

deported, nor could they report defendant BLAKE to any other government authority.

Proceeds of the Scheme

15. Defendant BLAKE misappropriated all or substantially all of the funds provided to her by her victims for her personal benefit. For example, despite representing to her victims that their funds would be used to obtain immigration paperwork, defendant BLAKE used her victims' money to pay for, among other things:

a. lavish gambling trips to Atlantic City casinos, during which defendant BLAKE wagered hundreds of thousands of dollars on slot machines, baccarat tables, and other games of chance;

b. monthly payments for a luxury BMW vehicle; and

c. luxury clothing items, including, but not limited to, numerous fur coats, designer handbags, and designer shoes.

16. From in or about May 2004 through in or about April 2009, in the District of New Jersey, and elsewhere, for the purpose of executing and attempting to execute this scheme and artifice to defraud, defendant

ROSA BLAKE,
a/k/a "Mafalda,"
a/k/a "Rosa Vareiro,"

did knowingly transmit and cause to be transmitted by wire

communication in interstate and foreign commerce writings, signs, signals, pictures and sounds, namely, wire transfers on or about the dates and in the amounts as described below:

<u>COUNT</u>	<u>APPROXIMATE DATE</u>	<u>WIRE COMMUNICATION</u>
1	March 1, 2006	Wire transfer in the amount of \$4,000 from a victim in Bridgeport, CT to defendant Rosa Blake in Margate, NJ
2	March 1, 2006	Wire transfer in the amount of \$4,000 from a victim in Bridgeport, CT to defendant Rosa Blake in Margate, NJ
3	March 7, 2006	Wire transfer in the amount of \$2,700 from a victim in Mount Vernon, NY to defendant Rosa Blake in Margate, NJ
4	April 26, 2007	Wire transfer in the amount of \$6,500 from a victim in Newark, NJ to defendant Rosa Blake, a/k/a "Rosa Vareiro," in Ilhavo, Portugal
5	April 28, 2007	Wire transfer in the amount of \$3,500 from a victim in Newark, NJ to defendant Rosa Blake, a/k/a "Rosa Vareiro," in Ilhavo, Portugal
6	July 17, 2007	Wire transfer in the amount of \$2,000 from a victim in Newark, NJ to defendant Rosa Blake, a/k/a "Rosa Vareiro," in Ilhavo, Portugal

In violation of Title 18, United States Code, Section 1343 and Section 2.

COUNTS SEVEN THROUGH SIXTEEN
(False Personation of an Officer or
Employee of the United States)

1. Paragraphs one and three through sixteen of Counts One through Six of this Indictment are hereby alleged and incorporated as though set forth in full herein.

2. On or about the dates set forth below, in the District of New Jersey and elsewhere, defendant

ROSA BLAKE,
a/k/a "Mafalda,"
a/k/a "Rosa Vareiro,"

knowingly and intentionally falsely assumed and pretended to be an officer and employee acting under the authority of the United States and a department, agency, and officer thereof, and acted as such, and in such pretended character demanded and obtained money and things of value, as follows:

<u>COUNT</u>	<u>APPROXIMATE DATE</u>	<u>VICTIM</u>
7	May 2004-January 2005	T.B.
8	July 2004-January 2005	A.R.
9	January 2005-February 2005	R.D.S.
10	March 2005-April 2005	L.D. & A.D.
11	April 2005-November 2005	R.F.
12	June 2005-March 2006	L.C.

13	December 2005-February 2006	A.K.
14	February 2006-March 2006	P.C.B.
15	April 2007-July 2007	P.S.
16	February 2009-April 2009	Undercover Special Agent

In violation of Title 18, United States Code, Section 912 and Section 2.

COUNTS SEVENTEEN THROUGH TWENTY-THREE
(Transacting in Criminal Proceeds)

1. Paragraphs one and three through sixteen of Counts One through Six of this Indictment are hereby alleged and incorporated as though set forth in full herein.

2. On or about the dates set forth below, in the District of New Jersey and elsewhere, defendant

ROSA BLAKE,
a/k/a "Mafalda,"
a/k/a "Rosa Vareiro,"

knowingly engaged and attempted to engage in monetary transactions affecting interstate commerce in criminally derived property of a value greater than \$10,000, such property having been derived from specified unlawful activity, that is wire fraud, in violation of Title 18, United States Code, Sections 1343 and 2, as follows:

<u>COUNT</u>	<u>APPROXIMATE DATE</u>	<u>MONETARY TRANSACTION</u>
17	October 3, 2005	Exchange of approximately \$16,300 cash for gambling chips at the Borgata Hotel Casino & Spa in New Jersey, in four installments: approximately \$10,000, approximately \$5,000, approximately \$1,000, and approximately \$300
18	October 4, 2005	Deposit of approximately \$45,000 in cash to the Borgata Hotel Casino & Spa in New Jersey

19	October 8, 2005	Exchange of approximately \$12,100 cash for gambling chips at the Borgata Hotel Casino & Spa in New Jersey, in two installments: approximately \$10,000 and approximately \$2,100
20	October 25, 2005	Exchange of approximately \$13,500 cash for gambling chips at the Borgata Hotel Casino & Spa in New Jersey, in three installments: approximately \$7,500; approximately \$5,000; and approximately \$1,000
21	October 28, 2005	Exchange of approximately \$20,100 cash for gambling chips at the Borgata Hotel Casino & Spa in New Jersey, in two installments: approximately \$15,100 and approximately \$5,000
22	January 9, 2006	Exchange of approximately \$10,600 cash for gambling chips at Caesars Atlantic City Hotel and Casino in New Jersey, in two installments: approximately \$5,000 and approximately \$5,600
23	January 21, 2006	Exchange of approximately \$20,000 cash for gambling chips at Caesars Atlantic City Hotel and Casino in New Jersey, in three installments: approximately \$10,000, approximately \$5,000, and approximately \$5,000

In violation of Title 18, United States Code, Section
1957 and Section 2.

A TRUE BILL



PAUL J. FISHMAN
UNITED STATES ATTORNEY