

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon.
 :
 v. : Crim. No. 09-
 :
 ROSA BLAKE :
 a/k/a "Mafalda" : 18 U.S.C. §§ 1343, 912, & 2
 a/k/a "Rosa Vareiro" :

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 TO 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 and artifice is described below.

3. The object of the scheme and artifice was for

defendant BLAKE to defraud dozens of victims of over one hundred thousand dollars by falsely representing to her victims that she worked for the federal immigration authorities and could, for a fee of thousands of dollars per victim, provide the approval of, or speed up the approval of, the victims' immigration paperwork, including permanent residency documents (commonly known as "green cards") and employment authorization documents.

4. It was part of the scheme and artifice to defraud that defendant BLAKE would target victims who required official government action to acquire more permanent legal status in the United States than they possessed.

5. It was further part of the scheme and artifice to defraud that defendant BLAKE would falsely represent to her victims that she was an official employed by the federal government and invested with the power to influence official immigration decisions, including to provide the "services" described in paragraph 3 above.

6. It was further part of the scheme and artifice to defraud that 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. It was further part of the scheme and artifice to defraud that defendant BLAKE would falsely represent to her victims, in sum and substance, that her status provided her with

special access to applications for employment authorization documents and green cards, and could influence the processes by which these applications were approved.

8. It was further part of the scheme and artifice to defraud that defendant BLAKE would often instruct her victims to meet defendant BLAKE at defendant BLAKE's home, where defendant BLAKE would take the victim's identification papers and receive money for her "services."

9. It was further part of the scheme and artifice to defraud that defendant BLAKE would sometimes show her victims official-looking papers, with what appeared to be letterhead and insignias of federal immigration authorities, and would make the victims sign the papers. Defendant BLAKE would never permit her victims to retain or to make copies of these papers.

10. It was further part of the scheme and artifice to defraud that defendant BLAKE would falsely represent to a number of her victims, in sum and substance, that in a matter of several months, they would receive employment authorization documents in the mail, followed thereafter by green cards.

11. It was further part of the scheme and artifice to defraud that during her meetings with some of her victims, defendant BLAKE would wear what appeared to be official government credentials around her neck.

13. It was further part of the scheme and artifice to

defraud that defendant BLAKE took no action to further her victims' status in the United States and merely kept their money for her own personal use.

14. It was further part of the scheme and artifice to defraud that defendant BLAKE would 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:

a. that 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. that defendant BLAKE was a dangerous person;

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

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

e. that 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.

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

Count	Date	Wire Communication
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.
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In violation of Title 18, United States Code, Section 1343 and Section 2.

COUNT SEVEN

(False Personation of an Officer or
Employee of the United States)

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

2. From in or about February 2006 through in or about March 2006, 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.

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

COUNT EIGHT

(False Personation of an Officer or
Employee of the United States)

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

2. From in or about June 2005 through in or about March 2006, 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.

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

COUNT NINE

(False Personation of an Officer or
Employee of the United States)

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

2. From in or about April 2007 through in or about July 2007, 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.

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

COUNT TEN

(False Personation of an Officer or
Employee of the United States)

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

2. From in or about January 2005 through in or about February 2005, 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.

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

COUNT ELEVEN

(False Personation of an Officer or
Employee of the United States)

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

2. From in or about May 2004 through in or about August 2004, 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.

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

COUNT TWELVE

(False Personation of an Officer or
Employee of the United States)

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

2. From in or about March 2005 through in or about April 2005, 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.

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

COUNT THIRTEEN

(False Personation of an Officer or
Employee of the United States)

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

2. From in or about April 2005 through in or about May 2005, 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.

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

COUNT FOURTEEN

(False Personation of an Officer or
Employee of the United States)

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

2. From in or about February 2009 through in or about April 2009, in the District of New Jersey, and elsewhere, defendant

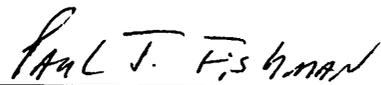
ROSA BLAKE,
a/k/a "Mafalda,"
a/k/a "Rosa Vareiro,"

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.

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

A TRUE BILL

FOREPERSON



PAUL J. FISHMAN
UNITED STATES ATTORNEY