

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

UNITED STATES OF AMERICA	:	Hon.
	:	
v.	:	Crim. No. 23-
	:	
	:	18 U.S.C. § 1343
YEZENIA CASTILLO,	:	26 U.S.C. § 7201
a/k/a “Yezenia Maldonado”	:	18 U.S.C. § 2

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:

COUNT ONE
(Wire Fraud)

Background

1. At all times relevant to this Information:
 - a. Defendant Yezenia Castillo, a/k/a “Yezenia Maldonado” (“CASTILLO”), resided in Hoboken, New Jersey.
 - b. Y. Castillo, P.C. (“YCPC”), Castillo Heating and Cooling Corporation, and Hudson Accounting Services (collectively, the “Entities”) were businesses controlled by CASTILLO and located in Hoboken, New Jersey. CASTILLO, in her own name and through the Entities, maintained approximately 29 separate bank accounts (collectively, the “Accounts”) at financial institutions throughout New Jersey.
 - c. “Victim Organization” was a non-profit religious organization operating in Glendale, New York, that maintained a bank account at “Bank-1,” a financial institution located in New York.

d. “Victim School” was a non-profit elementary and intermediate school operating in Jersey City, New Jersey, that maintained a bank account at “Bank-2,” a financial institution located in New Jersey.

The Scheme to Defraud

2. From at least in and around 2012 through at least in and around November 2021, in the District of New Jersey and elsewhere, defendant,

**YEZENIA CASTILLO,
a/k/a “Yezenia Maldonado,”**

knowingly and intentionally devised and intended to devise a scheme and artifice to defraud others, including Victim Organization and Victim School, 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, as set forth below.

Goal of the Scheme Fraud

3. The goal of the scheme to defraud was for CASTILLO to enrich herself by fraudulently obtaining money from her clients (“victims”), who hired her through YCPC based on her false representation that she was a Certified Public Accountant (“CPA”).

Manner and Means of the Scheme to Defraud

4. It was part of the scheme to defraud that:

a. From at least in and around 2012 through in and around November 2021, CASTILLO falsely held herself out as a CPA and fraudulently represented that she would provide clients with accounting, personal and business

federal and state tax preparation, and/or financial services (the “Services”). In fact, CASTILLO was not a CPA and did not provide these Services.

b. Over 100 victims, including individuals, companies, non-profit schools, and religious institutions, located throughout New Jersey, and elsewhere, hired CASTILLO through YCPC for one or more of the Services based on her false representations.

c. After being hired, CASTILLO gained access to victims’ bank accounts and, without authorization, issued checks and wire transfers to herself that she deposited into the Accounts.

d. CASTILLO collected money from victims, claiming she would use it to pay their federal and state personal and business taxes for them. Instead, CASTILLO deposited this money into the Accounts to enrich herself, without using any of it to pay the victims’ tax liabilities.

e. Through YCPC, CASTILLO fraudulently charged and collected a fee from the victims for the Services, without ever actually performing any of those Services.

f. To conceal and facilitate her scheme to defraud, CASTILLO falsely told the victims that she filed their tax returns and paid their federal and state taxes.

g. CASTILLO also falsified payment receipts, which she provided to the victims to make it appear that she had paid their federal and state tax obligations.

h. CASTILLO's scheme resulted in losses to the victims totaling over \$1,500,000. For example:

Victim Organization

i. In and around 2014, based on CASTILLO's false representations that she was a CPA, Victim Organization hired CASTILLO through YCPC to provide accounting and tax preparation services, including preparing and filing Victim Organization's federal business tax returns.

ii. At various times from in or around 2016 through in or around 2020, CASTILLO directed Victim Organization to transfer approximately \$200,000 to CASTILLO and YCPC, falsely claiming that she would transmit that money to the Internal Revenue Service ("IRS") to pay Victim Organization's federal business taxes owed for the tax years 2016 through 2020. Instead, CASTILLO caused that money to be deposited into the Accounts, and CASTILLO did not use any of those funds to pay the IRS for taxes owed by Victim Organization. Nor did CASTILLO file any tax returns on Victim Organization's behalf.

iii. To conceal and facilitate her scheme to defraud, CASTILLO falsely told Victim Organization that she filed its business tax returns and remitted its taxes to the IRS for each tax year from 2016 through 2020.

iv. Despite filing no actual returns for Victim Organization, CASTILLO fraudulently caused Victim Organization to pay her more than \$14,000 for the preparation and filing of federal business tax returns.

v. At various times in and around 2019, CASTILLO, without authorization from Victim Organization, also transferred more than \$7,000 from Victim Organization's Bank 1 account in New York, to the Accounts in New Jersey.

Victim School

vi. In and around 2016, based on CASTILLO's false representations that she was a CPA, Victim School hired CASTILLO through YCPC to provide tax accounting and tax preparation services, including the preparation of and filing with the IRS Victim School's business tax returns.

vii. At various times from in and around 2016 through in and around 2019, CASTILLO directed Victim School to transfer approximately \$195,000 to CASTILLO and YCPC, falsely claiming that she would transmit that money to the IRS to pay for Victim School's federal business taxes owed for the tax years 2016 through 2018. Instead, CASTILLO caused that money to be deposited into the Accounts, and CASTILLO did not use any of those funds to pay the IRS for taxes owed by Victim School. Nor did CASTILLO prepare and file any federal business tax returns on behalf of Victim School with the IRS for those years.

viii. To conceal her fraud, CASTILLO falsely told Victim School that she filed its business tax returns and remitted its taxes to the IRS for each tax year from 2016 through 2018.

ix. Despite filing no actual tax returns, CASTILLO, through YCPC, fraudulently caused Victim School to pay her over \$8,100 for the preparation and filing of the federal business tax returns.

x. In and around 2016, CASTILLO, without authorization from Victim School, also transferred over \$8,000 from Victim School's Bank 2 to the Accounts in New Jersey.

Execution of the Scheme

5. On or about May 11, 2018, for the purpose of executing the scheme and artifice to defraud, in the District of New Jersey and elsewhere, the defendant,

**YEZENIA CASTILLO,
a/k/a "Yezenia Maldonado,"**

did knowingly transmit and cause to be transmitted by means of wire communication in interstate and foreign commerce certain writings, signs, signals, pictures, and sounds, namely, a wire transfer in the amount of \$6,500 from Victim Organization to CASTILLO for the payment of federal business taxes, drawn on Victim Organization's bank account maintained at Bank-1 in New York, and received by CASTILLO into one of her Accounts located in New Jersey.

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

COUNT TWO
(Tax Evasion)

1. The allegations set forth in paragraphs 1, 3, and 4 of Count One of this Information are realleged here.

2. For the tax years listed in the table below, CASTILLO failed to file IRS Forms 1040 (U.S. Individual Income Tax Returns) for the income she personally derived from the fraud scheme described in Count One of this Information, thereby evading paying the following federal personal income taxes:

Tax Year	Approximate Undeclared Income	Approximate Tax Owed
2020	\$112,000	\$31,000
2019	\$59,000	\$16,000
2018	\$122,000	\$34,000
2017	\$236,000	\$66,000
2016	\$381,000	\$106,000
2015	\$262,000	\$68,000
2014	\$134,000	\$34,000

3. CASTILLO also failed to file IRS Forms 1120 (U.S. Corporation Income Tax Returns) with the income that YCPC derived from CASTILLO's scheme to defraud for the tax years listed in the tables below, thereby evading paying the following federal business taxes:

Tax Year	Approximate Undeclared Income	Approximate Tax Owed
2020	\$28,000	\$8,000
2019	\$85,000	\$24,000
2018	\$78,000	\$22,000
2016	\$101,000	\$28,000

3. In and around 2019, in the District of New Jersey and elsewhere, defendant,

**YEZENIA CASTILLO,
a/k/a “Yezenia Maldonado,”**

did knowingly and willfully attempt to evade and defeat a substantial tax that she owed to the United States for the calendar year 2019, in that she engaged in the conduct described in Count One of this Information, and failed to file a personal tax return, Form 1040, with the IRS for the tax year 2019, thereby evading the payment of taxes owed on income from her scheme to defraud received during the 2019 calendar year.

In violation of Title 26, United States Code, Section 7201.

FORFEITURE ALLEGATION

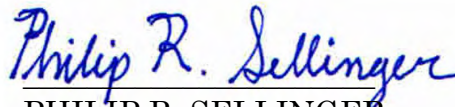
1. Upon conviction of the offense charged in Count One of this Information, defendant Yezenia Castillo, a/k/a Yezenia Maldonado, shall forfeit to the United States, pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), all property, real and personal, that defendant obtained that constitutes or is derived from proceeds traceable to the commission of such offense, and all property traceable to such property.

Substitute Assets Provision **(Applicable to All Forfeiture Allegations)**

2. If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. § 982(b)(1) and 28 U.S.C. § 2461(c), to seek forfeiture of any other property of such defendant up to the value of the forfeitable property described in paragraph 1.


PHILIP R. SELLINGER
United States Attorney