

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

UNITED STATES OF AMERICA : Criminal No. 21-
 :
 v. :
 : 18 U.S.C. § 1349
 TELWIN VINCENT : 18 U.S.C. § 1029(b)(2)

I N F O R M A T I O N

The defendant having waived in open court prosecution by indictment, the Acting United States Attorney for the District of New Jersey charges:

COUNT ONE
(Conspiracy to Commit Bank Fraud)

B A C K G R O U N D

1. At various times relevant to this Information:
 - a. Defendant TELWIN VINCENT (“VINCENT”) was a resident of Bronx, New York.
 - b. Brooke Doro (“Doro”), a co-conspirator not charged in this Information, was a resident of Bronx, New York and an associate of VINCENT.
 - c. “Company A” was a building supply and home improvement corporation with retail stores in New Jersey, New York, and elsewhere.
 - d. “Victim Bank-1,” “Victim Bank-2,” “Victim Bank-3” and “Victim Bank-4” (collectively referred to as “Victim Banks”) were “financial institutions” as the term is defined in Title 18, United States Code, Section 20, offering, among other things, credit, checking, savings, and investment accounts to customers.

THE CONSPIRACY

2. From at least in or around November 2017 through in or around May 2019, in the District of New Jersey and elsewhere, the defendant,

TELWIN VINCENT,

did knowingly and intentionally conspire and agree with Doro and others (the “Co-Conspirators”) to execute and attempt to execute a scheme and artifice to defraud financial institutions, as defined in Title 18, United States Code, Section 20, namely, Victim Banks, the deposits of which were insured by the Federal Deposit Insurance Corporation, and to obtain money, funds, credits, assets, securities, and other property owned by, and under the custody and control of, such financial institutions, by means of material false and fraudulent pretenses, representations, and promises, contrary to Title 18, United States Code, Section 1344.

Goal of the Conspiracy

3. The goal of the conspiracy was for VINCENT and the Co-Conspirators to enrich themselves by using fraudulently obtained credit card account information to purchase merchandise from Company A and then sell the merchandise to third parties for cash or return the merchandise to Company A in exchange for store credit.

Manner and Means of the Conspiracy

4. It was part of the conspiracy that VINCENT obtained from the internet personally identifiable information (“PII”) belonging to other people,

including credit card account information belonging to customers of Victim Banks.

5. It was further part of the conspiracy that VINCENT used the stolen PII to obtain fraudulent driver's licenses with Co-Conspirators' photographs, but in the names of Victim Banks' customers. VINCENT then provided the fraudulent driver's licenses to the Co-Conspirators in furtherance of the scheme.

6. It was further part of the conspiracy that VINCENT and the Co-Conspirators placed dozens of online orders for merchandise, including high-end electronic devices, from Company A using the stolen credit card account information of Victim Banks' customers.

7. It was further part of the conspiracy that Co-Conspirators, including Doro, at VINCENT's instruction, went to Company A's retail stores in New Jersey and elsewhere and impersonated Victim Banks' account holders using the fraudulent driver's licenses to retrieve the merchandise purchased online using the stolen credit card account information.

8. It was further part of the conspiracy that the Co-Conspirators, at VINCENT's instruction, returned some of the merchandise to Company A's stores in New Jersey and elsewhere in exchange for store credit, which VINCENT later sold to third parties in exchange for cash.

9. It was further part of the conspiracy that VINCENT sold some of the merchandise to third parties, such as pawn shops, in exchange for cash.

In violation of Title 18, United States Code, Section 1349.

COUNT TWO
(Conspiracy to Use Unauthorized Access Devices)

1. The allegations in paragraph 1 and paragraphs 3 through 9 of Count One of this Information are re-alleged and incorporated as if set forth fully herein.

THE CONSPIRACY

2. From at least in or around April 2018 through in or around May 2019, in the District of New Jersey and elsewhere, the defendant,

TELWIN VINCENT,

did knowingly and with the intent to defraud, conspire with Doro and others to use one or more unauthorized access devices, as defined in Title 18, United States Code, Section 1029(e)(1), namely, credit card account numbers, during a one-year period, and by such conduct obtained things of value aggregating \$1,000 or more during that period, such conduct having an effect on interstate commerce, contrary to Title 18, United States Code, Section 1029(a)(2).

Goal of the Conspiracy

3. It was the goal of the conspiracy for VINCENT, Doro, and others, to enrich themselves through the unauthorized use of credit card account numbers belonging to the Victim Banks' account holders.

Overt Acts

4. In furtherance of the conspiracy and to effect its goal, VINCENT, Doro, and others committed and caused to be committed the following overt acts, among others, in the District of New Jersey, and elsewhere:

a. On or about April 19, 2018, while in New Jersey, VINCENT made three unauthorized online purchases from Company A using the credit card account number of an account holder of Victim Bank-1, totaling approximately \$4,363.00.

b. On or about July 2, 2018, while in New Jersey, VINCENT made six unauthorized online purchases from Company A using the credit card account number of an account holder of Victim Bank-1, totaling approximately \$4,327.00.

In violation of Title 18, United States Code, Section 1029(b)(2).

FORFEITURE ALLEGATION AS TO COUNT ONE

1. Upon conviction of the conspiracy offense charged in Count One of this Information, defendant TELWIN VINCENT shall forfeit to the United States, pursuant to 18 U.S.C. § 982(a)(2)(A), all property, real and personal, that constitutes or is derived from proceeds the defendant obtained directly or indirectly as a result of such offense.

FORFEITURE ALLEGATION AS TO COUNT TWO

2. As a result of committing the offenses in violation of 18 U.S.C. § 1029 alleged in Count Two of this Information, defendant TELWIN VINCENT shall forfeit to the United States:

- a. pursuant to 18 U.S.C. § 982(a)(2)(B), any property constituting, or derived from, proceeds obtained directly or indirectly as a result of such offense; and
- b. pursuant to 18 U.S.C. § 1029(c)(1)(C), any personal property used or intended to be used to commit such offense.

Substitute Assets Provision
(Applicable to All Counts)

3. 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 Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1) and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of such defendant up to the value of the forfeitable property described in paragraphs 1 and 2.


RACHAEL A. HONIG
Acting United States Attorney

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INFORMATION FOR

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