

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon.
 :
 v. : Crim. No. 22-
 :
 MARCO ALVAREZ : 18 U.S.C. § 1343

INFORMATION

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

(Wire Fraud)

1. At all times relevant to this Information:

a. The "Victim Business" was a hotel company headquartered in Parsippany, New Jersey.

b. The "Credit Card Company" was a financial services company headquartered in New York that provided corporate credit cards and services to the Victim Business and its employees.

c. Defendant Marco Alvarez ("ALVAREZ") was a resident of Bloomfield, New Jersey. From in or about 2010 to in or about 2020, the Victim Business employed ALVAREZ in various positions, including as a Senior Analyst for Strategic Sourcing responsible for administering the Victim Business's corporate credit card programs. In this capacity, ALVAREZ was authorized to approve

applications for corporate credit cards and access account information for such credit cards.

d. “Individual-1” was a member of ALVAREZ’s family and resided in Bloomfield, New Jersey. Individual-1 was not an employee of the Victim Business.

The Scheme to Defraud

2. Beginning at least as early as in or about April 2014 through in or about January 2020, in the District of New Jersey, and elsewhere, defendant

MARCO ALVAREZ

knowingly and intentionally devised and intended to devise a scheme and artifice to defraud the Victim Business and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, which scheme and artifice was in substance as set forth below.

Goal of the Scheme to Defraud

3. The goal of the scheme was for ALVAREZ to enrich himself by opening and utilizing six corporate credit cards belonging to Victim Business-1 to make unauthorized purchases for personal expenses.

Manner and Means of Scheme to Defraud

4. It was part of the scheme that:

a. From in or about April 2014, to in or about January 2020, ALVAREZ completed and submitted six Corporate Credit Card applications: two in his own name, and four in Individual-1’s name, (the “Unauthorized Credit Cards”). As the administrator of the Victim Business’s corporate credit card program,

ALVAREZ approved the applications that he submitted for the Unauthorized Credit Cards. Once the accounts were open, ALVAREZ used the Unauthorized Credit Cards to make approximately \$317,000 in unauthorized personal purchases, including for airfare, concert and sporting event tickets, and luxury clothing.

b. The Victim Business earned credits from legitimate credit card transactions that could be used to offset account balances payable to the Credit Card Company. ALVAREZ used his access to the Credit Card Company's online portal and his position as administrator of the program to conceal the scheme by directing the Credit Card Company to allocate approximately \$317,000 in credits towards payments due on the Unauthorized Credit Cards.

c. On or about March 23, 2017, ALVAREZ directed the Credit Card Company to transfer approximately \$9,451.42 in credits owed to the Victim Business but that ALVAREZ used to wrongfully offset unauthorized charges he made on one of the Unauthorized Credit Cards.

Execution of the Scheme to Defraud

5. On or about March 23, 2017, for the purpose of executing and attempting to execute the scheme and artifice to defraud, in the District of New Jersey and elsewhere, defendant

MARCO ALVAREZ

knowingly and intentionally transmitted and caused to be transmitted by means of wire communications in interstate commerce certain writings, signs, signals, pictures, and sounds, namely a wire communication that transferred approximately

\$9,451.42 of the Victim Business's credits to the credit card in Individual-1's name to offset the defendant's unauthorized transactions.

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

FORFEITURE ALLEGATION

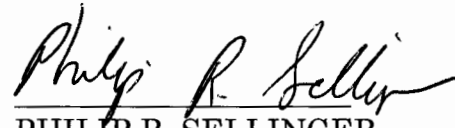
1. As a result of committing the offense alleged in this Information, ALVAREZ shall forfeit to the United States, pursuant to 18 U.S.C. § 982(a)(2), any property constituting or derived from proceeds obtained directly or indirectly as a result of such offense.

SUBSTITUTE ASSETS PROVISION

2. If by any act or omission of the defendant any of the property subject to forfeiture:

- 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 above.


PHILIP R. SELLINGER
United States Attorney

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INFORMATION FOR

18 U.S.C. § 1343

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