

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA	:	Criminal No. 12-
	:	
v.	:	18 U.S.C. § 1349
	:	
ANTHONY MAROUSIS	:	<u>INFORMATION</u>
	:	
	:	

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

COUNT ONE

Defendant and Entities

1. At all times relevant to this Information:
 - a. Defendant ANTHONY MAROUSIS was a resident of Ocean County, New Jersey.
 - b. There were at least two co-conspirators, identified hereinafter as:
 - i. Co-conspirator 1 ("CC-1") was a resident of Montreal, Canada;
 - ii. Co-conspirator 2 ("CC-2") was a resident of Montreal, Canada;
 - c. Defendant ANTHONY MAROUSIS conspired and agreed with CC-1 and CC-2 and others to defraud financial institutions by

fraudulently depositing into various corporate bank accounts checks purportedly received from customers of a telemarketing business, and then withdrawing those funds from the victim banks knowing the deposited checks were, in fact, not obtained from consenting telemarketing customers.

d. Defendant ANTHONY MAROUSIS, CC-1 and CC-2, and others, incorporated businesses and/or opened corporate bank accounts, into which false and fraudulent checks were deposited, and from which defendant ANTHONY MAROUSIS, CC-1 and CC-2, and others, received ill gotten funds for personal use and transferred ill gotten funds to accounts controlled by themselves and other co conspirators.

e. Sovereign Bank was a financial institution, as defined in Title 18, United States Code, Section 20, whose deposits were insured by the FDIC, which was defrauded by defendant ANTHONY MAROUSIS and his co-conspirators in the manner set forth herein.

f. Central Jersey Bank was a financial institution, as defined in Title 18, United States Code, Section 20, whose deposits were insured by the FDIC, which was defrauded by defendant ANTHONY MAROUSIS and his co-conspirators in the manner set forth herein.

g. ACM International Leasing Corp., was a corporation incorporated by defendant ANTHONY MAROUSIS prior to the conspiracy, but defendant ANTHONY MAROUSIS, CC-1 and CC-2 used

this corporation to open a corporate bank account, which was used to effectuate the scheme to defraud in the manner set forth herein.

h. Calivada Marketing LLC was a corporation incorporated by defendant ANTHONY MAROUSIS on or about November 9, 2006. Defendant ANTHONY MAROUSIS, CC-1 and CC-2 used this corporation to open a corporate bank account, which was used to effectuate the scheme to defraud in the manner set forth herein.

i. Adolfo Marketing LLC was a corporation incorporated by defendant ANTHONY MAROUSIS on or about August 22, 2008. Defendant ANTHONY MAROUSIS, CC-1 and CC-2 used this corporation to open a corporate bank account, which was used to effectuate the scheme to defraud in the manner set forth herein.

The Conspiracy

2. From in or about November 2006 through in or about May 2009, in Ocean County, in the District of New Jersey, and elsewhere, defendant ANTHONY MAROUSIS did knowingly and willfully conspire and agree with CC-1 and CC-2, and others, to execute and attempt to execute a scheme and artifice to defraud Sovereign Bank and Central Jersey Bank ("the Banks"), and to obtain moneys, funds, and assets owned by, and under the custody and control of the Banks, by means of materially false and fraudulent pretenses, representations, and promises, contrary to Title 18, United States Code, Section 1344.

3. The object of the conspiracy was to defraud the Banks of money, funds, and assets by fraudulently depositing into corporate bank accounts at the Banks, checks and/or electronic debits purportedly received from customers of a telemarketing business, and then withdrawing those funds from the Banks, knowing the deposited checks were, in fact, not obtained from consenting telemarketing customers, and thereafter transferring those funds to other co-conspirators and withdrawing funds from the accounts for personal use.

4. It was further part of the conspiracy that on or about November 9, 2006, defendant ANTHONY MAROUSIS incorporated Calivada Marketing LLC, in the State of Delaware.

5. It was further part of the conspiracy that on or about November 9, 2006, defendant ANTHONY MAROUSIS opened or caused to be opened business checking account No. XXXXXX1340 in the name Calivada Marketing LLC, at Sovereign Bank in Brick, New Jersey, (hereinafter "Sovereign Calivada 1340 Account").

6. It was further part of the conspiracy that on or about January 2, 2007, defendant ANTHONY MAROUSIS opened or caused to be opened business checking account No. XXXXX5172 in the name ACM International Leasing Corp., at Central Jersey Bank in Point Pleasant, New Jersey, (hereinafter "CJB ACM Account").

7. It was further part of the conspiracy that from on or about January 18, 2007 to on or about May 21, 2007, defendant ANTHONY

MAROUSIS, CC-1 and CC-2 caused deposits to be made to the Sovereign Calivada 1340 Account. The deposits comprised of alleged telemarketing sales. These deposits were drawn upon accounts that were non-existent, closed, contained insufficient funds, or were drawn upon accounts of unwitting individuals who did not authorize the withdrawal.

8. It was further part of the conspiracy that on or about March 29, 2007, defendant ANTHONY MAROUSIS opened or caused to be opened business checking account No. XXXXX4852 in the name Calivada Marketing LLC, at the Central Jersey Bank in Point Pleasant, New Jersey, (hereinafter "CJB Calivada 4852 Account").

9. It was further part of the conspiracy that from on or about May 22, 2007 to on or about July 11, 2007, defendant ANTHONY MAROUSIS, CC-1 and CC-2 caused deposits to be made to the CJB Calivada 4852 Account. The deposits comprised of alleged telemarketing sales. These deposits were drawn upon accounts that were non-existent, closed, contained insufficient funds, or were drawn upon accounts of unwitting individuals who did not authorize the withdrawal.

10. It was further part of the conspiracy that on or about January 8, 2008, defendant ANTHONY MAROUSIS opened or caused to be opened business checking account No. XXXXX4475 in the name Calivada Marketing LLC, at the Central Jersey Bank in Point Pleasant, New Jersey, (hereinafter "CJB Calivada 4475 Account").

11. It was further part of the conspiracy that on or about August 27, 2008, defendant ANTHONY MAROUSIS opened or caused to be opened business checking account No. XXXXX6583 in the name Adolfo Marketing LLC, at the Central Jersey Bank in Point Pleasant, New Jersey, (hereinafter "CJB Adolfo 6583 Account").

12. It was further part of the conspiracy that on or about September 4, 2008 to on or about October 8, 2008, defendant ANTHONY MAROUSIS, CC-1 and CC-2 caused deposits to be made to the CJB Calivada 4475 Account. The deposits comprised of alleged telemarketing sales. These deposits were drawn upon accounts that were non-existent, closed, contained insufficient funds, or were drawn upon accounts of unwitting individuals who did not authorize the withdrawal.

13. It was further part of the conspiracy that from on or about September 5, 2008 to on or about September 18, 2008, defendant ANTHONY MAROUSIS transferred funds from the CJB Calivada 4475 Account to a company account in Canada called 66402 Canada, Inc., for the benefit of CC-2.

14. It was further part of the conspiracy that from on or about September 10, 2008 to on or about May 28, 2009, defendant ANTHONY MAROUSIS, CC-1 and CC-2, caused deposits to be made to the CJB Adolfo 6583 Account. The deposits comprised of alleged telemarketing sales. These deposits were drawn upon accounts that were non-existent, closed, contained insufficient funds, or

were drawn upon accounts of unwitting individuals who did not authorize the withdrawal.

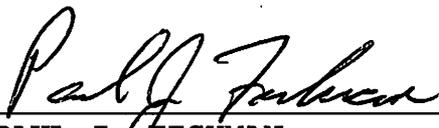
15. It was further part of the conspiracy that from on or about September 12, 2008 to on or about September 18, 2008, defendant ANTHONY MAROUSIS transferred funds from the CJB Adolfo 6583 Account to a business bank account in Canada called 66402 Canada, Inc., for the benefit of CC-2.

16. It was further part of the conspiracy that from on or about September 12, 2008 to on or about September 18, 2008, defendant ANTHONY MAROUSIS transferred funds from the CJB Adolfo 6583 Account to a business bank account at Banco Territorial in Canada for the benefit of CC-1.

17. It was further part of the conspiracy that from on or about September 22, 2008 to on or about October 8, 2008, defendant ANTHONY MAROUSIS transferred funds from the CJB Calivada 4475 Account to a business bank account in Canada called Unique Consumer Services for the benefit of CC-2.

18. It was further part of the conspiracy that from on or about May 1, 2009 to on or about May 28, 2009, defendant ANTHONY MAROUSIS transferred funds from the CJB Adolfo 6583 Account to a business bank account in Canada called Unique Consumer Services for the benefit of CC-2.

All in violation of Title 18, United States Code, Section
1349.



PAUL J. FISHMAN
United States Attorney