BV/2009R00732

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA	:	**Hon.**
	:	
v.	:	**Crim. No. 12-_____**
	:	
SANDRA MASTORIS	:	**31 U.S.C. §§ 5324(a)(3) and (d)(2)**

INDICTMENT

The Grand Jury, in and for the District of New Jersey, sitting in Newark, charges:

1. At all relevant times, JPMorganChase, Bank of America, PNC Bank, Sovereign Bank and Grand Bank were domestic financial institutions within the meaning of Title 31, United States Code, Sections 5312 and 5313(a).

2. At all relevant times, Title 31, United States Code, Section 5313(a), and the regulations issued thereunder, required that Currency Transaction Reports be filed for transactions in currency of more than $10,000, including deposits, withdrawals, exchanges of currency, and other payments and transfers by, through, or to a bank.

3. Between on or about May 1, 2008, and on or about December 31, 2009, in Mercer County, in the District of New Jersey, and elsewhere, the defendant,

SANDRA MASTORIS,

for the purpose of evading the reporting requirements of Title 31, United States Code, Section

5313(a), with respect to such transactions, knowingly structured and assisted in structuring, and attempted to structure and assist in structuring, transactions with domestic financial institutions by causing United States currency totaling in excess of $700,000 to be deposited in amounts of less than $10,000, and, as part of a pattern of illegal activity involving more than $100,000 in a 12-month period between June 27, 2008, and June 27, 2009, knowingly structured, assisted in structuring, and attempted to structure and assist in structuring more than $100,000.

4. By in or about 2008, Sandra Mastoris had accumulated a cash hoard of approximately up to $900,000. In the years 2008 and 2009, she then made cash deposits of portions of that cash hoard at five different banks.

5. In 2008, Sandra Mastoris made the following cash deposits on the dates, at the banks and into the accounts as follows:

Date	Bank	Account (last 4 digits)	Deposit
05/19/2008	Sovereign Bank	6929	$4,000
05/19/2008	Sovereign Bank	6929	$7,740
05/27/2008	Sovereign Bank	5725	$1,760
05/27/2008	Sovereign Bank	6929	$5,310
05/27/2008	Chase Bank	7075	$8,900
05/30/2008	Sovereign Bank	6929	$9,300
05/30/2008	Chase Bank	7075	$9,500
05/31/2008	Sovereign Bank	6929	$9,500
06/02/2008	Chase Bank	7075	$9,500
06/06/2008	Chase Bank	7075	$9,950
06/13/2008	Chase Bank	7075	$9,000

06/17/2008	Chase Bank	7075	$9,000
06/24/2008	Chase Bank	7075	$9,600
06/27/2008	Bank of America	4972	$9,675
06/30/2008	PNC Bank	2874	$9,800
07/08/2008	Bank of America	4972	$9,500
07/09/2008	Chase Bank	7075	$8,000
07/09/2008	PNC Bank	2874	$8,000
07/14/2008	Sovereign Bank	5725	$1,000
07/17/2008	Chase Bank	7075	$8,500
07/25/2008	Sovereign Bank	5725	$2,540
07/25/2008	PNC Bank	2874	$9,000
07/28/2008	Bank of America	4972	$8,000
07/30/2008	Chase Bank	7075	$9,500
08/15/2008	Bank of America	4972	$9,500
08/15/2008	Chase Bank	7075	$9,000
08/15/2008	PNC Bank	2874	$9,500
08/27/2008	Sovereign Bank	5725	$1,900
08/29/2008	Bank of America	4972	$9,900
08/29/2008	Chase Bank	7075	$5,000
08/29/2008	Chase Bank	8846	$4,500
08/29/2008	PNC Bank	2874	$8,500
09/29/2008	Sovereign Bank	5725	$2,000
10/01/2008	Sovereign Bank	5725	$2,430
10/08/2008	Bank of America	4972	$9,000
10/08/2008	PNC Bank	2874	$9,000
10/08/2008	Chase Bank	7075	$9,000

10/16/2008	Sovereign Bank	5725	$1,200
10/17/2008	Sovereign Bank	5725	$1,000
10/27/2008	Sovereign Bank	5725	$2,500
10/27/2008	Sovereign Bank	6929	$5,000
10/28/2008	Sovereign Bank	5725	$1,500
10/30/2008	Sovereign Bank	5725	$1,060
11/03/2008	Sovereign Bank	5725	$1,000
12/01/2008	Sovereign Bank	5725	$3,000
12/03/2008	Sovereign Bank	5725	$2,000
12/05/2008	Sovereign Bank	5725	$2,960
12/12/2008	Sovereign Bank	6929	$4,130
12/17/2008	Bank of America	4972	$7,800
12/17/2008	PNC Bank	2874	$7,400
12/26/2008	Sovereign Bank	5725	$2,660
12/26/2008	Sovereign Bank	6929	$7,760
12/29/2008	Sovereign Bank	5725	$3,000
12/29/2008	Grand Bank	4375	$9,300
12/31/2008	Grand Bank	4081	$2,500
12/31/2008	Grand Bank	4367	$1,000
12/31/2008	Grand Bank	4073	$2,500
12/31/2008	Grand Bank	4375	$2,500.

6. In 2009, Sandra Mastoris made the following cash deposits on the dates, at the banks and into the accounts as follows:

Date	Bank	Account (last 4 digits)	Deposit
01/05/2009	Grand Bank	4367	$2,500
01/05/2009	Grand Bank	4375	$2,500
01/05/2009	Bank of America	0927	$6,000
01/05/2009	PNC Bank	2874	$6,000
01/08/2009	Grand Bank	4073	$2,500
01/08/2009	Grand Bank	4081	$2,500
01/20/2009	Grand Bank	4073	$2,500
01/20/2009	Grand Bank	4367	$2,000
01/20/2009	Grand Bank	4081	$2,500
01/20/2009	Grand Bank	4375	$2,500
01/20/2009	Bank of America	0927	$5,000
01/20/2009	PNC Bank	2874	$5,000
01/26/2009	Grand Bank	4073	$2,500
01/26/2009	Grand Bank	4367	$2,000
01/26/2009	Grand Bank	4081	$2,500
01/26/2009	Grand Bank	4375	$2,500
01/29/2009	Grand Bank	3144	$2,500
01/29/2009	Sovereign Bank	5725	$1,500
01/30/2009	Bank of America	4972	$4,500
02/02/2009	Grand Bank	3144	$1,700
02/02/2009	PNC Bank	2874	$4,500
02/03/2009	Grand Bank	4367	$2,000
02/03/2009	Grand Bank	4081	$2,500
02/03/2009	Grand Bank	4375	$2,500
02/03/2009	Grand Bank	4073	$2,500
02/06/2009	Grand Bank	3144	$1,000

02/09/2009	Grand Bank	4367	$2,000
02/09/2009	Grand Bank	4375	$2,500
02/09/2009	Grand Bank	4073	$2,500
02/09/2009	Grand Bank	4081	$2,500
02/11/2009	Grand Bank	3144	$2,500
02/12/2009	Bank of America	4972	$5,000
02/12/2009	PNC Bank	2874	$5,000
02/13/2009	Grand Bank	3144	$1,950
02/17/2009	Grand Bank	4073	$2,500
02/17/2009	Grand Bank	3144	$1,200
02/17/2009	Grand Bank	4081	$2,500
02/18/2009	Grand Bank	4367	$2,000
02/18/2009	Grand Bank	4375	$2,500
02/19/2009	Grand Bank	4367	$2,000
02/19/2009	Grand Bank	4073	$2,500
02/19/2009	Grand Bank	4081	$2,500
02/19/2009	Grand Bank	4375	$2,500
02/23/2009	Grand Bank	4367	$2,000
02/23/2009	Grand Bank	4375	$2,500
02/23/2009	Grand Bank	4081	$2,500
02/23/2009	Grand Bank	4073	$2,500
02/27/2009	Grand Bank	4367	$2,000
02/27/2009	Grand Bank	4375	$2,500
02/27/2009	Grand Bank	4081	$2,500
02/27/2009	Grand Bank	4073	$2,500
02/28/2009	Sovereign Bank	5725	$2,000
03/02/2009	Grand Bank	4367	$2,000
03/02/2009	Grand Bank	4081	$2,500
03/02/2009	Grand Bank	4073	$2,500
03/02/2009	Grand Bank	4375	$2,500
03/02/2009	Sovereign Bank	5725	$2,000
03/03/2009	Sovereign Bank	5725	$1,500

03/06/2009	Grand Bank	4073	$2,500
03/06/2009	Grand Bank	4375	$2,500
03/06/2009	Grand Bank	4367	$2,000
03/06/2009	Grand Bank	4081	$2,500
03/09/2009	Grand Bank	4375	$2,500
03/09/2009	Grand Bank	4367	$2,000
03/09/2009	Grand Bank	4081	$2,500
03/09/2009	Grand Bank	4073	$2,500
03/11/2009	Grand Bank	4081	$2,500
03/11/2009	Grand Bank	4073	$2,500
03/11/2009	Grand Bank	4367	$2,000
03/11/2009	Grand Bank	4375	$2,500
03/13/2009	Grand Bank	4081	$2,500
03/13/2009	Grand Bank	4367	$2,000
03/13/2009	Grand Bank	4375	$2,500
03/13/2009	Grand Bank	4073	$2,500
03/23/2009	Grand Bank	3144	$2,700
03/27/2009	Grand Bank	3144	$2,500
03/28/2009	Sovereign Bank	5725	$2,000
03/30/2009	Sovereign Bank	5725	$2,000
03/30/2009	Grand Bank	3144	$2,800
04/01/2009	Sovereign Bank	5725	$1,000
04/02/2009	Grand Bank	3144	$1,700
04/06/2009	Grand Bank	3144	$2,900
04/10/2009	Grand Bank	3144	$2,800
04/13/2009	Grand Bank	3144	$2,950
04/14/2009	Grand Bank	3144	$2,500
04/17/2009	Grand Bank	3144	$2,000

04/20/2009	Grand Bank	3144	$2,800
04/23/2009	Grand Bank	3144	$2,500
04/27/2009	Grand Bank	3144	$2,800
04/28/2009	Grand Bank	3144	$4,000
04/28/2009	Grand Bank	3144	$2,000
04/30/2009	Sovereign Bank	5725	$1,350
05/01/2009	Grand Bank	3144	$2,500
05/04/2009	Grand Bank	3144	$2,000
05/04/2009	Grand Bank	3144	$6,000
05/06/2009	Grand Bank	3144	$1,000
05/06/2009	Grand Bank	3144	$1,460
05/08/2009	Grand Bank	3144	$1,950
05/11/2009	Grand Bank	3144	$2,900
05/14/2009	Grand Bank	3144	$2,500
05/15/2009	Grand Bank	3144	$1,500
05/18/2009	Grand Bank	3144	$2,900
05/21/2009	Grand Bank	3144	$2,900
05/22/2009	Grand Bank	3144	$2,500
05/26/2009	Grand Bank	3144	$2,300
05/26/2009	Sovereign Bank	5725	$1,820
05/27/2009	Grand Bank	3144	$2,900
06/01/2009	Sovereign Bank	5725	$2,760
06/02/2009	Sovereign Bank	5725	$1,000
06/05/2009	Grand Bank	3144	$2,500

06/08/2009	Grand Bank	3144	$2,900
06/10/2009	Grand Bank	3144	$2,600
06/12/2009	Grand Bank	3144	$2,900
06/15/2009	Grand Bank	3144	$2,800
06/17/2009	Grand Bank	3144	$2,500
06/19/2009	Grand Bank	3144	$2,600
06/22/2009	Grand Bank	3144	$2,900
06/23/2009	Sovereign Bank	5725	$1,000
06/23/2009	Grand Bank	3144	$2,600
06/26/2009	Grand Bank	3144	$2,800
06/29/2009	Grand Bank	3144	$2,700
07/01/2009	Grand Bank	3144	$2,900
07/01/2009	Sovereign Bank	5725	$1,600
07/03/2009	Grand Bank	3144	$2,900
07/06/2009	Grand Bank	3144	$2,250
07/08/09	Grand Bank	3144	$2,600
07/10/2009	Grand Bank	3144	$2,800
07/13/2009	Grand Bank	3144	$2,500
07/15/2009	Grand Bank	3144	$2,750
0717/2009	Grand Bank	3144	$2,600
07/20/2009	Grand Bank	3144	$2,500
07/22/09	Grand Bank	3144	$2,850
07/24/2009	Grand Bank	3144	$2,500

07/27/2009	Grand Bank	3144	$2,900
07/29/2009	Grand Bank	3144	$2,450
07/31/2009	Grand Bank	3144	$2,500
08/03/2009	Grand Bank	3144	$2,900
08/05/2009	Grand Bank	3144	$2,700
08/07/2009	Grand Bank	3144	$2,800
08/10/2009	Grand Bank	3144	$2,500
08/11/2009	Grand Bank	3144	$2,000
08/14/2009	Grand Bank	3144	$2,450
08/18/2009	Grand Bank	3144	$2,800
08/19/2009	Sovereign Bank	5725	$1,500
08/21/2009	Grand Bank	3144	$2,000
08/24/2009	Grand Bank	3144	$2,900
08/25/2009	Grand Bank	3144	$2,400
08/26/2009	Grand Bank	3144	$2,900
08/28/2009	Grand Bank	3144	$2,900
08/31/2009	Grand Bank	3144	$2,900
09/02/2009	Grand Bank	3144	$2,950
09/04/2009	Grand Bank	3144	$2,000
09/21/2009	Grand Bank	3144	$2,000
09/22/2009	Grand Bank	3144	$2,900
09/29/2009	Sovereign Bank	5725	$1,000

10/20/2009	Grand Bank	3144	$2,250
10/21/2009	Grand Bank	3144	$2,900
10/23/2009	Grand Bank	3144	$2,800
10/26/2009	PNC Bank	1469	$5,000
10/26/2009	Grand Bank	3144	$2,950
10/27/2009	Grand Bank	3144	$2,500
10/28/2009	PNC Bank	1469	$3,000
10/28/2009	Grand Bank	3144	$2,800
10/29/2009	Grand Bank	3144	$2,900
10/30/2009	Grand Bank	3144	$2,500
11/02/2009	Grand Bank	3144	$2,950
11/03/2009	Grand Bank	3144	$2,800
11/10/2009	Sovereign Bank	5725	$1,000
11/13/2009	Grand Bank	3144	$2,700
11/16/2009	Grand Bank	3144	$2,900
11/17/2009	Grand Bank	3144	$2,950
11/18/2009	Grand Bank	3144	$2,900
11/19/2009	Grand Bank	3144	$2,950
11/20/2009	Grand Bank	3144	$1,600
11/23/2009	Grand Bank	3144	$2,900
11/24/2009	Grand Bank	3144	$6,040
11/30/2009	Sovereign Bank	5725	$1,000
12/03/2009	Grand Bank	3144	$2,900

12/04/2009	Grand Bank	3144	$2,900
12/07/2009	Grand Bank	3144	$2,900
12/08/2009	Grand Bank	3144	$8,300
12/22/2009	Sovereign Bank	5725	$1,140.

In violation of Title 31, United States Code, Sections 5324(a)(3) and 5324(d)(2).

FORFEITURE ALLEGATION

1. The allegations contained in this Indictment are hereby realleged and incorporated by reference for the purpose of noticing forfeiture pursuant to Title 31, United States Code, Section 5317.

2. Upon conviction of the offense set forth in this Indictment, the defendant,

SANDRA MASTORIS,

shall forfeit to the United States of America, pursuant to Title 31, United States Code, Section 5317(c), all property, real or personal, involved in the offense and any property traceable thereto.

3. If any of the above-described forfeitable property, 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; and

Title 31, United States Code, Section 5317(c) to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described in this forfeiture allegation.

A TRUE BILL

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FOREPERSON

PAUL J. FISHMAN
UNITED STATES ATTORNEY