

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon.
v. : Crim. No. 10-
MAXIMO DIAZ : 18 U.S.C. § 286

INFORMATION

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

1. At all times relevant to this Information, co-conspirator Roberto Rivera and co-conspirator David Roman were employed as letter carriers with the United States Postal Service.
2. From in or about July 2006 through in or about June 2008, co-conspirator Diana Nunez was employed as a bank teller at Valley National Bank in Passaic, New Jersey.
3. From in or about July 2007 through in or about July 2008, in the District of New Jersey, and elsewhere, defendant

MAXIMO DIAZ

knowingly and intentionally entered into an agreement, combination, and conspiracy with Diana Nunez, Roberto Rivera, David Roman, and others to defraud the United States and any department or agency thereof, namely the United States Department of the Treasury, by obtaining the payment of false, fictitious, and fraudulent claims, namely individual income tax refund checks.

Object of the Conspiracy

4. The object of the conspiracy was for defendant DIAZ and his co-conspirators to obtain and cash income tax refund checks that were generated through the filing of false tax

returns with the Internal Revenue Service, and to use the resulting illicit cash proceeds for their personal benefit.

Manner and Means of the Conspiracy

5. It was part of the conspiracy that beginning in or about July 2007, members of the conspiracy would submit false individual income tax returns to the Internal Revenue Service using, among other things, fictitious names, employer information, and deductions, with the objective of generating tax refund checks issued by the United States Department of the Treasury (collectively, the "Tax Refund Checks").

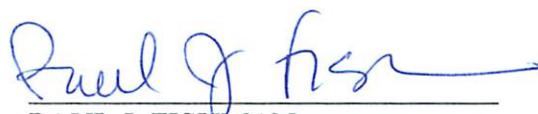
6. It was further part of the conspiracy that some of the Tax Refund Checks would be mailed to fictitious names at actual addresses on the United States Postal routes of various Postal Service letter carriers, including the routes assigned to co-conspirator Rivera and co-conspirator Roman.

7. It was further part of the conspiracy that co-conspirator Rivera and co-conspirator Roman would be paid to collect the Tax Refund Checks and deliver them to other members of the conspiracy.

8. It was further part of the conspiracy that from on or about April 1, 2008 through on or about May 22, 2008, defendant DIAZ would cause the Tax Refund Checks to be cashed at the Valley National Bank branch located in Passaic, New Jersey.

9. It was further part of the conspiracy that co-conspirator Nunez would herself cash the Tax Refund Checks or arrange for other bank tellers to do so.

All in violation of Title 18, United States Code, Section 286.



PAUL J. FISHMAN
United States Attorney

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