UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT

UNITED STATES OF AMERICA

v.

DAMIAN DELGADO

CRIMINAL NO. 3:17CR93 (JAM)

VIOLATIONS:

18 U.S.C. Section 1349
(Conspiracy to Commit Mail and Wire Fraud)

26 U.S.C. Section 7201
(Tax Evasion)

INFORMATION

The United States Attorney charges:

COUNT ONE
(Conspiracy to Commit Mail and Wire Fraud)

1. From in or about January 2009 until in or about July 2016, in the District of Connecticut and elsewhere, the defendant, DAMIAN DELGADO, willfully and knowingly did combine, conspire, confederate, and agree with others known to the United States Attorney to commit mail and wire fraud, in violation of Title 18, United States Code, Sections 1341 and 1343.

2. The object and purpose of the conspiracy was for DELGADO and his co-conspirators to enrich themselves by knowingly and willfully devising and intending to devise a scheme to defraud investors and to obtain money from these investors by means of materially false and fraudulent pretenses, representations, and promises, and to use the mails and interstate wires in execution of that scheme.

3. The manner and means by which DELGADO and his co-conspirators executed the conspiracy and scheme to defraud included: (a) inducing investors to purchase securities by making false and misleading representations concerning the securities and the issuing companies; (b) causing the price of those securities to become falsely inflated; (c) causing to be sold the positions in those securities of conspirators and their designees at those falsely inflated prices, thereby enriching the members of the conspiracy; and (d) thereafter allowing the price of the securities to fall, leaving investors with worthless and unsalable stock.

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

<u>COUNT TWO</u>
(Tax Evasion)

4. At all relevant times, DELGADO was a resident of Florida.

5. Substantially all of DELGADO's income was the proceeds of criminal activity, namely the conspiracy to commit mail and wire fraud described in Count One of this Information.

6. DELGADO willfully attempted to evade federal income taxes he owed the United States of America for calendar year 2014 by, among other means, (a) diverting his share of the scheme's proceeds into bank accounts in the names of his wife and step-daughter, and bank accounts in the names of various shell entities controlled by DELGADO and his wife; (b) withdrawing cash from those accounts; and (c) failing to file with the Internal Revenue Service a U.S. Individual Income Tax Return, Form 1040, for calendar year 2014. As a result of these affirmative steps, DELGADO reported no income and paid no federal income taxes in calendar year

2014. In fact, as DELGADO then and there knew, in 2014 his total taxable income was approximately $77,819, and he owed the United States of America approximately $15,415 in federal income taxes.

All in violation of Title 26, United States Code, Section 7201.

UNITED STATES OF AMERICA

DEIRDRE M. DALY
UNITED STATES ATTORNEY

AVI M. PERRY
ASSISTANT UNITED STATES ATTORNEY

PETER S. JONGBLOED
ASSISTANT UNITED STATES ATTORNEY