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U.S. DISTRICT COURT  
DISTRICT OF NEW JERSEY  
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UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA

v.

ROBERT LOURENCO

Crim. No. 20-1055JHR

18 U.S.C. § 1029(a)(2)

18 U.S.C. § 2

INDICTMENT

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

1. At all times relevant to this Indictment:
  - a. Defendant ROBERT LOURENCO resided in, among other places, Staten Island, New York, Morris Plains, New Jersey, and hotels in Atlantic City, New Jersey.
  - b. Victim 1 resided in Brigantine, New Jersey, with his mother, Victim 2. Defendant ROBERT LOURENCO met Victims 1 and 2 in June 2015 when Victim 2 was 78-years old and hospitalized.
2. Defendant ROBERT LOURENCO fraudulently used the means of identification of Victim 1, Victim 2, and other victims to open credit card accounts without the victims' knowledge or authorization.
3. Defendant ROBERT LOURENCO used and caused to be used the means of identification of Victim 1, Victim 2, and other victims to fraudulently obtain credit cards without the victims' knowledge or authorization.

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4. Defendant ROBERT LOURENCO caused and attempted to cause payments to be made toward the fraudulently obtained credit cards from both real and nonexistent bank accounts in the victims' names without their knowledge or authorization.

5. From on or about the beginning date set forth below through on or about the ending date set for the below, in the District of New Jersey and elsewhere, defendant

ROBERT LOURENCO

did knowingly and with intent to defraud use during a one-year period an unauthorized access device, to wit: the credit card obtained with intent to defraud set forth below, and by such conduct did obtain things of value aggregating \$1,000 or more during that period, in a manner affecting interstate commerce.

<b>COUNT</b>	<b>APPROXIMATE BEGINNING DATE</b>	<b>APPROXIMATE ENDING DATE</b>	<b>CREDIT CARD</b>
1	October 14, 2015	December 21, 2015	Discover it card ending 6576
2	October 29, 2015	February 6, 2016	Barclaycard Rewards MasterCard ending 8392

In violation of Title 18, United States Code, Sections 1029(a)(2) and 2.

FORFEITURE ALLEGATION

1. As a result of committing the access device fraud offenses in violation of 18 U.S.C. § 1029 alleged in Counts One and Two of this Indictment, the defendant,

ROBERT LOURENCO,

shall forfeit to the United States, pursuant to 18 U.S.C. § 982(a)(2)(B), any property constituting, or derived from, proceeds obtained directly or indirectly, as a result of such offense, and pursuant to 18 U.S.C. § 1029(c)(1)(C), any personal property that was used or intended to be used to commit or to facilitate the commission of the offenses charged in Counts One and Two of this Indictment.

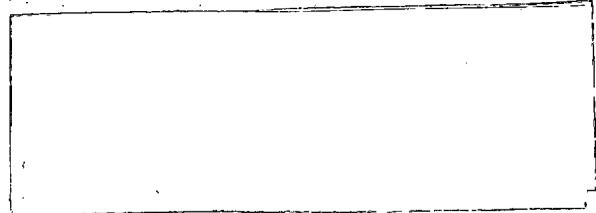
Substitute Assets Provision

2. 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 person;
- (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 subdivided 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), to seek forfeiture of any other property of said defendant up to the value of the above forfeitable property.

A TRUE BILL



*Craig Carpenito*

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CRAIG CARPENITO  
United States Attorney

CASE NUMBER: 20-

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United States District Court  
District of New Jersey

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UNITED STATES OF AMERICA

v.

ROBERT LOURENCO

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INDICTMENT FOR

18 U.S.C. § 1029(a)(2)  
18 U.S.C. § 2

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CRAIG CARPENITO  
U.S. ATTORNEY, NEWARK, NEW JERSEY

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ASSISTANT U.S. ATTORNEY  
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