

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA : Hon. Cathy L. Waldor
: :
v. : Mag. No. 23-9238
: :
DIANA VALTERI and : **CRIMINAL COMPLAINT**
EDMOND HAXHILLARI :

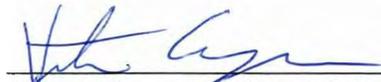
I, Victor Camaya, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

SEE ATTACHMENT A

I further state that I am a Special Agent with the Federal Bureau of Investigation, and that this Complaint is based on the following facts:

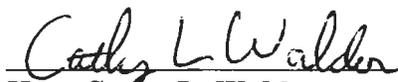
SEE ATTACHMENT B

continued on the attached pages and made a part hereof.



Victor Camaya, Special Agent
Federal Bureau of Investigation

Special Agent Victor Camaya, attested to this Affidavit by telephone pursuant to F.R.C.P. 4.1(B)(2)(A) on this 26th day of June, 2023.



Hon. Cathy L. Waldor
United States Magistrate Judge

ATTACHMENT A

COUNT ONE
(Wire Fraud)

From in or around June 2020 through in and around August 2020, in Sussex County, in the District of New Jersey and elsewhere, defendants

DIANA VALTERI and
EDMOND HAXHILLARI

knowingly and intentionally devised and intended to devise a scheme and artifice to defraud, with the common goal to defraud the Small Business Administration by way of the Economic Injury Disaster Loan (“EIDL”) program, and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, and, for the purpose of executing and attempting to execute such scheme and artifice, did transmit and cause to be transmitted by means of wire communications in interstate and foreign commerce, the following writing, sign, signal, picture, and sound:

Approx. Date	Description of Wire
6/16/2020	EIDL application for IMC Furniture LLC submitted from New Jersey via interstate wire to servers located in Iowa, requesting approximately \$24,000 in loans and approximately \$6,000 as an advance.

In violation of Title 18, United States Code, Sections 1343 and 2.

COUNT TWO
(Money Laundering)

On or about July 23, 2020, in the District of New Jersey and elsewhere,
defendant

DIANA VALTERI and
EDMOND HAXHILLARI

did knowingly engage and attempt to engage in a monetary transaction by, through, and to a financial institution, affecting interstate and foreign commerce, in criminally derived property of a greater value than \$10,000, that is, causing a check for approximately \$96,000 from a joint bank account ending in 3833 to be deposited into a joint checking account ending in 7515, such property having been derived from a specified unlawful activity, that is, wire fraud in violation of Title 18, United States Code, Section 1343.

In violation of Title 18, United States Code, Sections 1957 and 2.

ATTACHMENT B

I, Victor Camaya, am a Special Agent of the Federal Bureau of Investigations. The information contained in the complaint is based upon my personal knowledge, as well as information obtained from other sources, including: (a) statements made or reported by various witnesses with knowledge of relevant facts; (b) my review of publicly available information; and (c) my review of evidence, including, business records, bank records, and other documents. Because this complaint is being submitted for a limited purpose, I have not set forth every fact that I know concerning this investigation. Where the contents of documents and the actions and statements of others are reported, they are reported in substance and in part, except where otherwise indicated. Where I assert that an event took place on a particular date, I am asserting that it took place on or about the date alleged.

Overview

1. From in or around June 2020 through in or around August 2020, defendants Diana Valteri (Valteri) and Edmond Haxhillari (Haxhillari, collectively “the Defendants”), were a married couple who participated in a fraudulent scheme to receive approximately \$790,000 in COVID-19 emergency relief loans and cash advances meant for distressed small businesses under the Economic Injury Disaster Loan (“EIDL”) program. The Defendants submitted false and fraudulent loan applications on behalf of entities that purported to have employees and revenue, but were actually shell companies with no actual business operations. After receiving the EIDL funds based on their fraud, the Defendants diverted the proceeds for their own personal gain.

Background

The EIDL Program

2. The Coronavirus Aid, Relief, and Economic Security (“CARES”) Act was a federal law enacted in or around March 2020 designed to provide emergency financial assistance to millions of Americans suffering economic effects caused by the COVID-19 pandemic. One source of relief provided by the CARES Act was the authorization of the Economic Injury Disaster Loan (“EIDL”) program. EIDL was a Small Business Administration (“SBA”) program that provided low-interest financing to small businesses, renters, and homeowners in regions affected by declared disasters.

3. In order to obtain an EIDL, a qualifying business was required to submit an application to the SBA and provide information about its operations, such as the number of employees, gross revenues for the 12-month period preceding the disaster, and cost of goods sold in the 12-month period preceding the disaster. In the case of EIDLs for COVID-19 relief, the 12-month period constituted the 12 months preceding

January 31, 2020. In addition, the business entity must have existed in an operational condition on February 1, 2020.

4. The amount of the EIDL was determined based, in part, on the information the applicant provided regarding the revenue, employees, and cost of goods of the company. The SBA directly issued any funds disbursed under an EIDL to the applicant company. A company was permitted to use EIDL funds for payroll expenses, sick leave, production costs, and business obligations, such as debts, rent, and mortgage payments.

5. EIDL applications were received in cloud-based platforms. The location of the server through which the EIDL application was submitted was based on the date the application was processed by SBA and the application number. During the period relevant to this Information, all EIDL applications and supporting documents were received in a cloud-based platform through SBA servers in Des Moines, Iowa.

The Defendants and Their Shell Entities

6. At all times relevant to this Criminal Complaint:

a. Valteri and Haxhillari resided together in Sparta, New Jersey and fraudulent applied for EIDL loans through the following shell entities that purportedly did business in New Jersey (collectively, the "Fraud Entities"):

- i. IMC Furniture LLC ("IMC");
- ii. Elite Empire Construction, LLC ("Elite");
- iii. Diana Valteri Accounting a/k/a Diana Accounting ("Valteri Accounting");
- iv. Igli's Express DBA ("Igli's Express"), which purportedly provided limousine and transportation services;
- v. Edmond Haxhillari ("Haxhillari Entity"), which purportedly provided appraisal services;
- vi. DValteri a/k/a Dvalteri Best Service ("Dvalteri Best"), which purportedly provided appraisal services.

The Scheme to Defraud

7. From in or around June 2020 through in or around August 2020, Valteri and/or Haxhillari submitted, or caused to be submitted, fraudulent loan applications from each of the Fraud Entities to the SBA in order to obtain funds through the EIDL program. Each application listed one or both of the Defendants' contact information.

Moreover, IP data showed that each application was prepared and submitted via the SBA’s online portal from the Defendants’ shared address in Sparta, New Jersey (the “Defendants’ Address”) to SBA servers located in or around Des Moines, Iowa.

8. The Defendants’ EIDL applications for each of the Fraud Entities were submitted on or about the following dates, listed one or more of the Defendants as the signing applicant and/or company owner, and resulted in the following approximate payouts by the SBA:

Name of Fraud Entity on Application	Application Date	Defendants’ Name(s) on Application	Amount Funded
IMC	6/16/2020	Signor: Haxhillari Owners: Haxhillari and Valteri	\$24,000 loan and \$6,000 advance
Elite	6/18/2020	Signor and owner: Haxhillari	\$150,000 loan and \$10,000 advance
Valteri Accounting	7/21/2020	Signor and owner: Valteri	\$150,000 loan
Igli’s Express	7/21/2020	Signor and owner: Haxhillari	\$150,000 loan
DValteri Best	8/7/2020	Signor and owner: Valteri	\$150,000 loan
Haxhillari Entity	8/7/2020	Signor and owner: Haxhillari	\$150,000 loan

9. Each of these applications falsely listed the Fraud Entities’ respective number of employees, annual gross revenues from on or about January 31, 2019, to on or about January 31, 2020, and costs of goods sold. The reported figures were substantial. For example, the loan applications for DValteri Best and Haxhillari Entity—both submitted on or about August 7, 2020—listed identical gross revenue for each company of approximately \$2,150,000.

10. All of those figures, however, were fake. In fact, records from the Internal Revenue Service and Social Security Administration show that none of Fraud Entities filed taxes or had any employees from in or around 2018 through in or around 2020. Nor did the Defendants report any income or losses on their personal tax returns for any of the Fraud Entities. In short, none of the Fraud Entities had any actual business-related activity.

11. Based on financial analysis, none of the EIDL funds sent to the Fraud Entities were used for their intended purpose. Instead, the Defendants diverted the

funds through a web of personal and joint accounts, which included transferring over \$200,000 in EIDL funds to Valteri's personal investment account.

12. For example, in order to receive the EIDL funds for Elite, discussed above, the Defendants opened a new joint personal bank account ending with 3833. Using that account, Defendants received the EIDL advance for Elite on or about June 18, 2020, and the EIDL loan on or about July 9, 2020—totaling approximately \$159,000. Within days, that account was almost entirely liquidated. First, on or about July 20 and 21, 2020, the Defendants caused approximately \$60,000 to be transferred from the 3833 account to Valteri investment account. Then on or about July 23, 2023, Valteri signed a check for approximately \$96,000 from the 3833 account, which the Defendants caused to be deposited in their separate joint checking account ending in 7515 at a different bank.

13. In total, the Defendants' fraud scheme resulted in losses to the SBA of approximately \$790,000.