

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon.  
 :  
 v. : Crim. No. 15-\_\_\_\_\_  
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 :  
 VIJAYKUMAR PATEL : 18 U.S.C. § 1349

**INFORMATION**

**COUNT ONE**

(Conspiracy to Commit Wire Fraud)

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

**BACKGROUND**

1. At all times relevant to this Information:

a. Defendant VIJAYKUMAR PATEL ("PATEL") was a resident of Pennsylvania.

b. Green Dot Corporation ("Green Dot") was an entity that, among other things, sold prepaid reloadable debit cards ("Green Dot Cards"). Green Dot Cards, once funded, could be used to make purchases. In order to fund a Green Dot Card individuals using the cards were first required to register the card telephonically or on-line by providing, inter alia, a name, address, telephone number, date of birth and Social Security number.

c. There were several ways to fund a Green Dot Card. One involved the purchase of a MoneyPak card from retail stores in amounts from \$20.00 up to \$500.00. Once purchased, the customer could, using a code (PIN number) on the back of the MoneyPak card, authorize a transfer of funds from the MoneyPak card to a Green Dot Card. For instance, a customer who purchased a \$500 MoneyPak could provide the PIN number associated with that MoneyPak to an individual who had a Green Dot Card. The Green Dot Card holder could then effect the transfer through Green Dot's website or by calling Green Dot's toll free number and providing both the Green Dot Card number and the MoneyPak PIN code.

#### THE CONSPIRACY

2. From at least as early as in or about September 2013 through in or about March 2014, in Camden County, in the District of New Jersey and elsewhere, the defendant,

VIJAYKUMAR PATEL,

did knowingly and intentionally conspire and agree with Alpeshkumar Patel and others to devise a scheme and artifice to defraud, and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, and, for the purpose of executing such scheme and artifice to defraud, did transmit and cause to be transmitted by means of wire communications in interstate and foreign commerce, certain writings, signs,

signals, pictures, and sounds, contrary to Title 18, United States Code, Section 1343.

#### OBJECT OF THE CONSPIRACY

3. It was the object of the conspiracy for defendant PATEL and others to enrich themselves by fraudulently obtaining money from victims by threatening or tricking them into purchasing MoneyPaks and providing the conspirators the PIN numbers.

#### MANNER AND MEANS OF THE CONSPIRACY

4. It was part of the conspiracy that defendant PATEL and others purchased Green Dot Cards in New Jersey and elsewhere.

5. It was further part of the conspiracy that conspirators contacted, typically by telephone, victims, and, through threat or trickery, caused the victims to purchase MoneyPaks and provide the conspirators with the PIN numbers for the MoneyPaks.

6. It was further part of the conspiracy that conspirators used the PIN numbers for the MoneyPaks to fund the previously purchased Green Dot Cards, thereby causing wire communications to be sent in interstate commerce.

7. It was further part of the conspiracy that conspirators, including defendant PATEL, used the fraudulently funded Green Dot Cards to purchase money orders, which the conspirators, including defendant PATEL, deposited into bank accounts.

8. It was further part of the conspiracy that the conspirators made sure the actions discussed above took place in rapid succession to thwart law enforcement.

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

### **FORFEITURE ALLEGATION**

1. The allegations contained in Count One of this Information are realleged and incorporated by reference as though set forth in full herein for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c).


2. Upon conviction of the offense charged in Count One of this Information, defendant PATEL shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of the offense, and all property traceable to such property.

3. If by any act or omission of defendant PATEL any of the property subject to forfeiture herein:

- 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 subdivided without difficulty,

the United States shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by 28 U.S.C. § 2461(c).

All pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title  
28, United States Code, Section 2461(c).

  
\_\_\_\_\_  
PAUL J. FISHMAN  
United States Attorney

**CASE NUMBER:** \_\_\_\_\_

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**UNITED STATES OF AMERICA**

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**VIJAYKUMAR PATEL**

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**INFORMATION FOR**

**18 U.S.C. § 1349**

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**PAUL J. FISHMAN**

*UNITED STATES ATTORNEY, NEWARK, NEW JERSEY*

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