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

UNITED STATES OF AMERICA : Hon. Cathy L. Waldor
 : :
 : Mag. No. 16-7047
 : :
LEE VACCARO : COMPLAINT

I, Mary E. Gardocki, 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 page and made a part hereof.



Mary E. Gardocki, Special Agent
Federal Bureau of Investigation

Sworn to before me and subscribed in my presence,
May 3, 2016 at Newark, New Jersey

HONORABLE CATHY L. WALDOR
UNITED STATES MAGISTRATE JUDGE



Signature of Judicial Officer

ATTACHMENT A

Count 1
(Conspiracy to Commit Securities Fraud)

From in or about 2009 to in or about 2015, in Bergen County, in the District of New Jersey, and elsewhere, defendant

LEE VACCARO

did knowingly and willfully combine, conspire, confederate and agree with Co-conspirator #1 and others to commit an offense against the United States, namely securities fraud, by using and employing through the direct and indirect use of the means and instrumentalities of interstate commerce and the mails, manipulative and deceptive devices and contrivances in connection with the purchase and sale of securities by (i) employing devices, schemes, and artifices to defraud members of the investing public; (ii) making untrue statements of material facts and omitting to state material facts necessary in order to make the statements made, in the light of the circumstances under which they were made, not misleading; and (iii) engaging in acts, practices, and a course of business which operated and would operate as a fraud and deceit upon investors, namely by participating in a scheme to defraud investors seeking to purchase interests in warrants to purchase the stock of eAgency, contrary to Title 15, United States Code, Sections 78j(b) and 78ff(a), and Title 17, Code of Federal Regulations, Section 240-10b-5.

Overt Acts

In furtherance of the conspiracy and to effect the unlawful objects thereof, VACCARO, Co-conspirator #1 and others committed and caused to be committed the following overt acts, among others, in the District of New Jersey and elsewhere:

a. On or about April 7, 2010, VACCARO sent a wire transfer of approximately \$100,000 to Co-conspirator #1's bank account in New Jersey, representing a portion of the proceeds from defrauding Victim #1.

b. On or about July 16, 2012, Co-conspirator #1 deposited a check for approximately \$124,000, representing the proceeds from defrauding Victim #2, at a bank in Tenafly, New Jersey.

In violation of Title 18, United States Code, Section 371.