

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA	:	Crim. No. 16-
	:	
v.	:	Hon.
	:	
LISSETTE DELAROSA	:	18 U.S.C. § 1349
	:	

**INFORMATION**

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

**CONSPIRACY TO COMMIT MAIL FRAUD**  
**(18 U.S.C. § 1349)**

1. At all times relevant to this Information:
  - a. A watch manufacturer (the "Watch Company") was a company doing business in Bergen County, New Jersey, and elsewhere.
  - b. Defendant Lissette Delarosa ("DELAROSA"), was an employee of the Watch Company's Customer Service Department in Paramus, New Jersey.
  - c. Cynthia Alvarez ("Alvarez" or "Co-Conspirator Alvarez"), formerly known as "Cynthia Espejo," was an employee of the Watch Company's Customer Service Department in Paramus, New Jersey.

### The Conspiracy

2. From at least as early as in or around May 2003 through in or around July 2010, in Bergen County, in the District of New Jersey and elsewhere, defendant

#### LISSETTE DELAROSA

did knowingly and intentionally conspire and agree with Cynthia Alvarez and with others to devise a scheme and artifice to defraud the Watch Company and to obtain money and property from the Watch Company by means of materially false and fraudulent pretenses, representations, and promises, and, for the purpose of executing such scheme and artifice to defraud, to deliver and cause to be delivered by mail and private and commercial interstate carrier according to directions thereon certain matter and things, namely watches and watch parts, contrary to Title 18, United States Code, Section 1341.

### Object of the Conspiracy

3. It was the object of the conspiracy for defendant DELAROSA, Co-conspirator Alvarez, and others (collectively, the "Co-conspirators") to make money by creating false and fraudulent invoices and records that caused the Watch Company to send watches and watch parts free of charge to addresses associated with the Co-conspirators, and then selling those watches and watch parts for the Co-conspirators' own benefit.

### Manner and Means of the Conspiracy

4. It was part of the conspiracy that defendant DELAROSA and Co-conspirator Alvarez agreed to use and did use their positions in the Customer Service Department of the Watch Company to create false and fraudulent invoices for watch parts in the Watch Company's invoicing system, and directed those parts be sent by private mail carrier to addresses associated with the Co-conspirators. These invoices contained materially false and fraudulent information, including, but not limited to, false names, fraudulent addresses, and false claims that the recipients had paid for the watch parts. The Watch Company received no payment related to these invoices, and no legitimate basis existed for providing the watch parts free of charge.

5. It was further part of the conspiracy that defendant DELAROSA and Co-conspirator Alvarez used their familiarity with the Watch Company's systems and policies to conceal their conspiracy by, among other things, billing the watch parts to certain prepaid accounts that were not monitored; repeatedly modifying the spellings of the recipient addresses; and falsely indicating that payment for the watch parts had already been received.

6. It was further part of the conspiracy that defendant DELAROSA and Co-conspirator Alvarez also agreed to create and did create false records containing fictitious customer complaints in the Watch Company's invoice system. These false records caused the Watch Company to send "replacement" watches free of charge by private mail carrier to addresses entered by

defendant DELAROSA and/or Co-conspirator Alvarez and associated with them. Defendant DELAROSA approved these fraudulent "replacement" watch orders.

7. It was further part of the conspiracy that each time a watch part or watch was sent by Watch Company pursuant to this scheme, defendant DELAROSA and Co-conspirator Alvarez knowingly and intentionally caused to be delivered by mail packages containing watches and watch parts from a Watch Company location in or around Bergen County, New Jersey to addresses in New Jersey, New York, Florida, and elsewhere.

In violation of Title 18, United States Code, Section 1349.

### FORFEITURE ALLEGATIONS

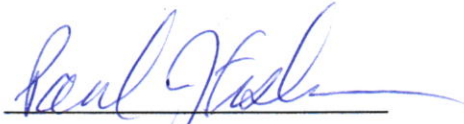
1. The allegations contained in all preceding paragraphs of this Information are hereby realleged and incorporated by reference for the purpose of noticing forfeiture pursuant to Title 28, United States Code, Section 2461(c) and Title 18, United States Code, Section 981(a)(1)(C).

2. The United States hereby gives notice to the defendant charged in this Information that, upon conviction of the offense charged in this Information, the government will seek forfeiture, in accordance with Title 28, United States Code, Section 2461(c), and Title 18, United States Code, Section 981(a)(1)(C), of any and all property, real or personal, that constitutes or is derived from proceeds traceable to the violation of Title 18, United States Code, Section 1349, alleged in this Information, in the amount of \$637,082 in United States currency, for which the defendant is jointly and severally liable with her co-conspirators.

3. If by any act or omission of the defendant, any of the property subject to forfeiture described in paragraph 2 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 will be entitled to forfeiture of substitute property up to the value of the property described above in paragraph 2, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).



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PAUL J. FISHMAN  
United States Attorney

CASE NUMBER: 16-

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**United States District Court  
District of New Jersey**

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**UNITED STATES OF AMERICA**

**v.**

**LISSETTE DELAROSA**

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**INFORMATION FOR**

18 U.S.C. § 1349

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**PAUL J. FISHMAN**

*U.S. ATTORNEY*

*NEWARK, NEW JERSEY*

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SVETLANA M. EISENBERG

*ASSISTANT U.S. ATTORNEY*

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