

FILED

JUN 20 2024

SEB

2024R00356/CS

AT 1:00 P.M.
CLERK, U.S. DISTRICT COURT - DNJ

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon. Judge Claire C. Cecchi
:
v. : Crim. No. 24-408
:
VICTOR ANTHONY VALDEZ : U.S.C. § 1349
:

INDICTMENT

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

Introduction

1. From in or around August 2020 through in or around August 2021, defendant VICTOR ANTHONY VALDEZ (“VALDEZ”) and a network of coconspirators worked together to enrich themselves by fraudulently obtaining money from elderly victims of a “grandparent” or “family-in-need-of-bail” scam (the “Grandparent Scam”). The Grandparent Scam targeted elderly victims, convincing them that a loved one had been arrested and urgently needed cash for bail and other legal services. As part of the conspiracy, a coconspirator residing in the Dominican Republic directed VALDEZ and other coconspirators in the United States to serve as couriers, picking up cash from victims in New Jersey and New York.

The Fraud Conspiracy

2. From in or around August 2020 through in or around August 2021, in the District of New Jersey and elsewhere, the defendant,

VICTOR ANTHONY VALDEZ,

did knowingly and intentionally conspire and agree with others known and unknown to knowingly and intentionally devise a scheme and artifice to defraud, and to obtain money and property from victims, 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.

Goal of the Fraud Conspiracy

3. The goal of the conspiracy was for VALDEZ and others to enrich themselves by fraudulently obtaining money from elderly victims of the Grandparent Scam.

Manner and Means of the Fraud Conspiracy

4. It was part of the conspiracy that:

a. VALDEZ and the coconspirators engaged in the Grandparent Scam, whereby members of the conspiracy targeted elderly victims, including victims residing in New Jersey, by making phone calls from call centers located in the Dominican Republic purporting to be the victim's grandchild, an attorney

representing the grandchild in criminal proceedings, court personnel, or other persons associated with the legal system. Coconspirators claimed to the victims that their grandchildren had been arrested and needed cash for bail or other expenses. Once victims were convinced through lies and falsehoods, coconspirators instructed the victims to provide cash to couriers, including VALDEZ, who went to victims' homes to pick up the cash.

b. Coconspirators in the Dominican Republic directed the activities of VALDEZ and other couriers in the United States, providing them with information, such as the victims' names, locations, the amount of cash to be picked up, the names of the victims' relatives, and the names used by the coconspirators to impersonate attorneys or court personnel. VALDEZ was sometimes directed to, and did, provide receipts to the victims for the picked-up cash. VALDEZ communicated with coconspirators through wire communications, including voice calls, voice messages, and text messages transmitted through interstate and foreign commerce.

5. As part of the Grandparent Scam, VALDEZ retrieved, or attempted to retrieve, tens of thousands of dollars from victims at their homes. Coconspirators directed VALDEZ to bring these victim funds to locations as directed by his coconspirators. VALDEZ kept a portion of the victim funds for himself as compensation.

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

FORFEITURE ALLEGATION

1. Upon conviction of the wire fraud offense charged in this Indictment, the defendant,

VICTOR ANTHONY VALDEZ,

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 wire fraud offense, and all property traceable thereto.

Substitute Assets Provision

2. If any of the property described above, 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 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 divided without difficulty,

the United States shall be entitled, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendants up to the value of the above-described forfeitable property.

A TRUE BILL



Foreperson

A handwritten signature in blue ink that reads "Philip R. Sellinger".

PHILIP R. SELLINGER
United States Attorney

A handwritten signature in blue ink that reads "A. Liskamm".

AMANDA LISKAMM
Director
Consumer Protection Branch
U.S. Department of Justice

CASE NUMBER: 2:24-cr-00408 (CCC)

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

UNITED STATES OF AMERICA

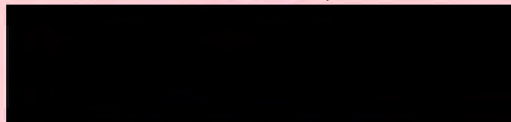
v.

VICTOR ANTHONY VALDEZ

INDICTMENT FOR

18 U.S.C. § 1349

A True Bill,



Foreperson

**PHILIP R. SELLINGER
UNITED STATES ATTORNEY
FOR THE DISTRICT OF NEW JERSEY**

**CAROLYN SILANE
ASSISTANT U.S. ATTORNEY
JASON FELDMAN, JOSHUA FERRENTINO, AND EMILY POWERS
DEPARTMENT OF JUSTICE TRIAL ATTORNEYS
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