

2023R00401/SDG

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

UNITED STATES OF AMERICA	:	Hon.
	:	
v.	:	Crim. No. 25-
	:	
STACY MARGARITONDO	:	18 U.S.C. § 1343

I N F O R M A T I O N

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

(Wire Fraud)

Individuals and Entities

1. At all times relevant to this Information:
 - a. Defendant Stacy Margaritondo (“MARGARITONDO”) resided in Scotch Plains, New Jersey and was employed as a bookkeeper at the “Victim Synagogue,” a religious institution based in Union County, New Jersey.
 - b. “Individual-1” was the treasurer of the Victim Synagogue’s Board of Directors (“BOD”) and a member of its Finance Committee.
 - c. “Bank-1” was a financial institution headquartered in San Francisco, California that maintained all of its servers outside of the District of New Jersey.

The Scheme to Defraud

2. From in or around December 2019 through in or around May 2023, in

Union County, in the District of New Jersey and elsewhere, the defendant,

STACY MARGARITONDO,

did knowingly and intentionally devise and intend to devise a scheme and artifice to defraud, and to deprive the Victim Synagogue of money and property by means of materially false and fraudulent pretenses, representations, and promises, as set forth below.

Goal of the Scheme to Defraud

2. The goal of the scheme was for MARGARITONDO to enrich herself by using her position as a bookkeeper at the Victim Synagogue to embezzle funds from the Victim Synagogue for her personal gain.

Manner and Means of the Scheme to Defraud

3. It was part of the scheme and artifice to defraud that:
- a. MARGARITONDO maintained employment as a bookkeeper at the Victim Synagogue.
 - b. MARGARITONDO used her position to embezzle and divert funds from the Victim Synagogue into bank accounts that MARGARITONDO controlled.
 - c. In particular, in or around 2010, MARGARITONDO was hired by the Victim Synagogue and later promoted to office manager and bookkeeper in or around July 2020.
 - d. MARGARITONDO's duties included, among other things, accounting/bookkeeping, payroll, preparing checks for accounts payable, and

reporting to the Victim Synagogue's BOD regarding the Victim Synagogue's financial condition.

e. MARGARITONDO routinely issued unauthorized checks made payable to herself drawn on the Victim Synagogue's bank accounts; obtained unauthorized additional funds by fraudulently using the Victim Synagogue's name, bank statements, and balance sheet to obtain short-term financing from at least three cash advance companies to conceal her embezzlement scheme; and intentionally kept inaccurate accounting records and altered bank statements that she provided to the BOD to conceal her scheme.

f. For example, between in and around December 2019 and in and around October 2022, MARGARITONDO issued approximately 55 unauthorized checks, made payable to herself, from the Victim Synagogue's bank accounts. MARGARITONDO then deposited each of the checks into one of two personal accounts she maintained at Bank-1.

g. MARGARITONDO deposited all but approximately five of the fraudulent checks into her Bank-1 accounts using the mobile deposit feature offered through Bank-1's cellphone application.

h. At no time during her employment at the Victim Synagogue did MARGARITONDO have authority to sign checks on the Victim Synagogue's behalf.

i. Therefore, to accomplish her fraudulent scheme, MARGARITONDO forged Individual-1's signature on each unauthorized check, then endorsed the back of each check with her own signature.

j. These forged checks totaled approximately \$161,175.61.

k. To perpetuate and conceal her embezzlement scheme, MARGARITONDO also fraudulently obtained approximately \$300,000 in cash advances in the Victim Synagogue's name to offset the Victim Synagogue's bank account balances each month.

Execution of the Scheme

4. For the purpose of executing the scheme and artifice to defraud, in Union County, in the District of New Jersey and elsewhere, the defendant,

STACY MARGARITONDO,

did knowingly transmit and cause to be transmitted by means of wire, radio, and television communication in interstate and foreign commerce, certain writing, signs, signals, pictures, and sounds, namely the deposit of a check on or about January 6, 2022, for approximately \$4,877 from the Victim Synagogue's bank account into MARGARITONDO's bank account, causing an interstate wire that traveled through New Jersey to servers in Alabama.

In violation of Title 18, United States Code, Section 1343.

FORFEITURE ALLEGATION

As a result of committing the offense charged in this Information, the defendant, **STACY MARGARITONDO**, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981 and Title 28, United States Code, Section 2461, all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of the charged offense and all property traceable thereto.

Substitute Assets Provision

If any of the above-described forfeitable property, 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 person;
- (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,

it is the intent of the United States, 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 defendant up to the value of the above forfeitable property.



JOHN GIORDANO
United States Attorney