UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA	:	Hon.
	:	
v.	:	Crim. No. 26-
	:	
SILVIA VASQUEZ-RIVERA	:	18 U.S.C. § 1962(d)

I N F O R M A T I O N

The defendant having waived in open court prosecution by Indictment, the United States charges:

(RICO Conspiracy)

The Enterprise

1. At all times relevant to this Information, in the District of New Jersey and elsewhere, the defendant, SILVIA VASQUEZ-RIVERA, and others, known and unknown to the United States, were members and associates of a criminal organization hereinafter referred to as the "Vasquez Fraud Enterprise" or the "Enterprise," whose members and associates engaged in, among other things, acts involving murder, kidnapping, robbery, mail theft, wire fraud, and bank fraud.

2. The Vasquez Fraud Enterprise, including its leaders, members, and associates, constituted an enterprise, as defined in Title 18, United States Code, Section 1961(4), namely, a group of individuals associated in fact that engaged in, and the activities of which affected, interstate and foreign commerce. The Enterprise constituted an ongoing organization whose members and associates functioned as a continuing unit for a common purpose of achieving the objectives of the Enterprise.

3. The Enterprise was comprised of members and associates who resided in and around Queens, New York, and the Bronx, New York, but who operated in New York and New Jersey.

4. The Enterprise was led by VASQUEZ, who resided in Queens, New York.

Purposes of the Enterprise

5. The purposes of the Enterprise, including its members and associates, included, but were not limited to, the following:

a. enriching VASQUEZ and other members and associates of the Enterprise through criminal activity, including mail theft, bank fraud, and wire fraud;

b. promoting and enhancing the prestige and reputation of the Enterprise;

c. increasing or maintaining the status of members and associates of the Enterprise within the Enterprise;

d. preserving and protecting the financial interests of the Enterprise through acts of violence, including attempted murder, kidnapping, and assault of individuals; and

e. keeping victims in fear of the Enterprise and its members and associates.

<u>Manner and Means of the Enterprise</u>

6. Among the manner and means by which members and associates of the Enterprise conducted and participated in the conduct of the affairs of the Enterprise were the following:

a. robbing United States Postal Service ("USPS") mail carriers for USPS keys that could be used to open USPS boxes containing mail and parcels for delivery;

b. using illicitly acquired USPS keys on at least approximately 100 occasions to open and remove mail from USPS collection boxes along USPS carrier routes in Englewood, New Jersey, New York, New York, and elsewhere;

c. depositing into nominee bank accounts checks and other financial instruments taken from the mail or otherwise illicitly acquired;

d. selling stolen checks and other financial instruments on internet-based messaging platforms, including more than 1,400 checks dated from in or around January 2023 to in or around August 2024 totaling more than approximately $2,800,000.00;

e. retaliating, including through violence, kidnapping, and burglary, against individuals believed to have threatened or harmed the financial interests of the Enterprise;

f. disciplining members and associates of the Enterprise;

g. creating social media posts (1) to depict Enterprise members with large sums of money to encourage others to purchase fraudulent financial instruments from the Enterprise and (2) to warn individuals who transact with the Enterprise against cheating the Enterprise out of money owed; and

h. hosting social events to enhance the status of the Enterprise, including extravagant parties.

The Racketeering Conspiracy

7. Beginning at least as early as in or around February 2023, and continuing through in or around August 2024, in the District of New Jersey, and elsewhere, the defendant,

SILVIA VASQUEZ-RIVERA,

together with others known and unknown, being a person employed by and associated with the Vasquez Fraud Enterprise, an enterprise engaged in, and the activities of which affected, interstate and foreign commerce, unlawfully and knowingly conspired and agreed with others to violate Title 18, United States Code, Section 1962(c), that is, to conduct and participate, directly and indirectly, in the conduct of the affairs of the Enterprise through a pattern of racketeering activity, as defined in Title 18, United States Code, Sections 1961(1) and (5), which pattern of racketeering activity consisted of multiple acts:

a. of murder, chargeable under N.Y. Penal Law §§ 125.25, 105.15, 110.00, and 20.00;

b. of kidnapping, chargeable under N.Y. Penal Law §§ 135.25, 135.20, 105.15, 105.10, 110.00, and 20.00, and N.J.S.A. §§ 2C:13-1, 2C:2-6, 2C:5-1, and 2C:5-2;

c. of robbery, chargeable under N.Y. Penal Law §§ 160.00, 160.15, 160.10, 160.05, 105.10, 110.00, and 20.00;

d. indictable under Title 18, United States Code, Section 1341 (relating to mail fraud);

e. indictable under Title 18, United States Code Section 1343 (relating to wire fraud); and

f. indictable under Title 18, United States Code, Section 1344 (relating to financial institution fraud).

8. It was part of the conspiracy that the defendant, SILVIA VASQUEZ-RIVERA, agreed that a conspirator would commit at least two acts of racketeering activity in the conduct of the affairs of the Enterprise.

<u>Overt Acts</u>

9. In furtherance of the racketeering conspiracy and to achieve the object of the conspiracy, VASQUEZ, along with others known and unknown, committed and caused to be committed various acts within the District of New Jersey, and elsewhere, including, but not limited to, the following:

a. On or about May 27, 2023, in New York, New York, and Paterson, New Jersey, VASQUEZ and one or more other members of the Enterprise kidnapped Victim-1 and held Victim-1 for a ransom that was paid by Victim-1's friends and family after Victim-1 unsuccessfully brokered an investment by VASQUEZ in Victim-1's luxury car business.

b. In or around 2023 and 2024, VASQUEZ directed, coordinated, or stole mail from USPS collection boxes on approximately 100 occasions, including in Englewood, New Jersey, and posted approximately $2.8 million of stolen checks for sale on Telegram.

c. On or about February 13, 2024, to coordinate the Enterprise's mail theft scheme, VASQUEZ sent a text message from Queens to one or more other members of the Enterprise who was stealing mail from USPS collection boxes in New Jersey that said, "U ok."

d. On or about March 22, 2024, in the Bronx, VASQUEZ directed other members of the Enterprise to shoot firearms into a vehicle believed to be occupied by an individual who had previously transacted with the Enterprise, and who the Enterprise believed was responsible for robbing VASQUEZ of criminal Enterprise proceeds. The shooting resulted in injury to Victim-2.

e. On or about May 24, 2024, following a dispute with another member of the Enterprise, Victim-3, who the Enterprise believed misappropriated criminal Enterprise proceeds to Victim-3's own use without authorization, VASQUEZ and one or more other members of the Enterprise burglarized and vandalized Victim-3's residence in Queens.

f. On or about August 21, 2024, in Queens, at VASQUEZ's direction, one or more other members of the Enterprise assaulted Victim-4 and robbed Victim-4 of a USPS key that VASQUEZ and other members and associates of the Enterprise intended to use to steal checks.

g. On or about August 22, 2024, in Queens, at VASQUEZ's direction, one or more other members of the Enterprise robbed Victim-5 of a USPS key that VASQUEZ and other members and associates of the Enterprise intended to use to steal checks.

All in violation of Title 18, United States Code, Section 1962(d).

FORFEITURE ALLEGATION

1. Upon conviction of the offense in violation of Title 18, United States Code, Section 1962, as charged in this Information, defendant, SILVIA VASQUEZ-RIVERA, shall forfeit to the United States, pursuant Title 18, United States Code, Section 1963:

a. any interest the defendant acquired or maintained in violation of Title 18, United States Code, Section 1962;

b. any interest in, security of, claim against, or property or contractual right of any kind affording a source of influence over, any enterprise which the defendant established, operated, controlled, conducted, or participated in the conduct of, in violation of Title 18, United States Code, Section 1962; and

c. any property constituting, or derived from, any proceeds the defendant obtained, directly or indirectly, from racketeering activity, in violation of Title 18, United States Code, Section 1962.

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 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,

it is the intent of the United States, pursuant to Title 18, United States Code, Section 1963(m), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described above.

ROBERT FRAZER
United States Attorney

ELI JACOBS
Assistant United States Attorney

Approved by:

Elaine K. Lou
Chief, Criminal Division

CASE NUMBER: 26-

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District of New Jersey

UNITED STATES OF AMERICA

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SILVIA VASQUEZ-RIVERA

INFORMATION FOR

18 U.S.C. § 1962(d)

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