

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

UNITED STATES OF AMERICA	:	Hon. Claire C. Cecchi
	:	
v.	:	Crim. No. 17-
	:	
ALISA ADLER	:	18 U.S.C. §§ 1343 & 2

I N F O R M A T I O N

The defendant having waived in open court prosecution by indictment and any defenses based on venue or any statute of limitations, the Acting United States Attorney for the District of New Jersey charges:

Counts One and Two
(Wire Fraud)

Background

1. At all times relevant to this Information:
 - a. Defendant ALISA ADLER (“defendant ADLER”) was a resident of New York and represented that she was a real estate investment professional.
 - b. Defendant ADLER controlled ASG Real Estate Services Group Inc. (“ASG”), a New York corporation.
 - c. Through ASG, defendant ADLER purported to engage in various real estate-related investments.
 - e. Victim Investor A was a resident of New York who provided defendant ADLER and ASG approximately \$125,000.
 - f. Victim Investor B was a resident of New York who

provided defendant ADLER and ASG approximately \$115,000.

Overview of the Scheme to Defraud

2. From in or about January 2009 through in or about August 2014, defendant ADLER operated a real estate-based Ponzi scheme. She made material fraudulent misrepresentations and omissions to induce victim investors, including, but not limited to, Victim Investor A and Victim Investor B, who are collectively referred to herein as the “Victim Investors,” to provide defendant ADLER and ASG with funds for purported real estate investments. Defendant ADLER solicited these investments by, among other things, representing to the Victim Investors that their money would be used for specific real estate investments, and often provided the Victim Investors with documents purporting to support those representations. In truth and in fact, however, defendant ADLER used the majority of the Victim Investors’ money for purposes other than what she represented to them, including by using a portion of their money for her own personal benefit, and by using a portion of later investors’ money to repay earlier investors.

The Scheme to Defraud

3. From in or about January 2009 through in or about August 2014, in the District of New Jersey and elsewhere, defendant

ALISA ADLER

did knowingly and intentionally devise and intend to devise a scheme and artifice to defraud the Victim Investors, including, but not limited to, Victim Investor A and Victim Investor B, and to obtain money by means of materially

false and fraudulent pretenses, representations, and promises.

Goal of the Scheme to Defraud

4. The goal of defendant ADLER's scheme to defraud was for defendant ADLER to profit unlawfully by misrepresenting to the Victim Investors that their money would be used for certain specific real estate investments while misappropriating the majority of the Victim Investors' money for her own personal and other uses.

Manner and Means of the Scheme to Defraud

5. It was part of the scheme and artifice to defraud that defendant ADLER presented the Victim Investors with various purported opportunities for real estate investments, supposedly to be made through ASG.

6. It was further part of the scheme and artifice to defraud that, to induce the Victim Investors to invest with defendant ADLER and ASG, defendant ADLER provided the Victim Investors with promotional materials and other documents for specific real estate investments and sent them communications, including via email in interstate and foreign commerce, describing such opportunities and the terms of the proposed investments.

7. It was further part of the scheme and artifice to defraud that defendant ADLER sent email communications in interstate and foreign commerce to certain Victim Investors containing documents that reflected the amount of their investment and provisions for repayment, often including the specific real estate project for which the funds were purported to be used.

8. It was further part of the scheme and artifice to defraud that,

contrary to the understanding of the Victim Investors, and without their knowledge, defendant ADLER did not use the majority of invested funds for the specific real estate investments she had presented to the Victim Investors. Instead, she used the Victim Investors' money, to, among other things, repay prior investors and pay her own personal expenses. For example, and among other things:

a. Beginning in or about July 2011, defendant ADLER made a series of representations to Victim Investor A regarding a specific proposed investment in a property in Massachusetts and a business in New York, including that Victim Investor A's money would be used only for the specific purposes described by defendant ADLER. Based in part upon defendant ADLER's representations, Victim Investor A provided defendant ADLER and ASG with approximately \$130,000. In truth and in fact, however, defendant ADLER did not use the majority of Victim Investor A's money as she had represented, but instead used it for other purposes, including her own personal expenses and to repay prior investors.

b. Beginning in or about July 2011, defendant ADLER made a series of representations to Victim Investor B regarding a specific proposed real estate investment in a business located in New York, including that Victim Investor B's money would be used only for the specific purposes described by defendant ADLER. Based in part upon defendant ADLER's representations, Victim Investor B provided defendant ADLER and ASG with approximately \$115,000. In truth and in fact, however, defendant ADLER did

not use the majority of Victim Investor B's money as she had represented, but instead used it for other purposes, including her own personal expenses.

9. On or about the dates set forth below, for the purpose of executing and attempting to execute this scheme and artifice to defraud, defendant

ALISA ADLER

did knowingly and intentionally transmit and cause to be transmitted by means of wire communications in interstate and foreign commerce the following writings, signs, signals, pictures and sounds, each constituting a separate count of this Information:

Count	Approximate Date	Description
One	August 6, 2013	Email from defendant ADLER to Victim Investor A regarding purported repayment of Victim Investor A's investment
Two	July 3, 2011	Email from defendant ADLER to Victim Investor B regarding the purported uses of Victim Investor B's investment

In violation of Title 18, United States Code, Section 1343 and Section 2.

Forfeiture Allegations

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

2. The United States hereby gives notice to the defendant that, upon conviction of the offenses charged in Counts One and Two, the government will seek forfeiture, in accordance with Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c), of any and all property, real or personal, that constitutes or is derived from proceeds traceable to the violations of Title 18, United States Code, Section 1343, alleged in Counts One and Two of this Information.

Substitute Assets Provision

3. If by any act or omission of the defendant, any of the property subject to forfeiture described above:

- 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 of America will be entitled to forfeiture of substitute property up to the value of the property described above, pursuant to Title 21, United States Code, Section 853(p), as

incorporated by Title 28, United States Code, Section 2461(c).

WILLIAM E. FITZPATRICK
Acting United States Attorney

incorporated by Title 28, United States Code, Section 2461(c).


WILLIAM E. FITZPATRICK
Acting United States Attorney

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ALYSA ADLER

INFORMATION FOR

18 U.S.C. § 1343

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(Ed. 1/97)**