

ATTACHMENT A

COUNT 1

(Conspiracy to Defraud the United States)

From in or around February 2019 through in and around July 2019, in Camden County, in the District of New Jersey and elsewhere, defendants

**LUCIANO ESTEVEZ,
OCTAVIO RODRIGUEZ,
JOSE GARCIA, and
JUAN MELO**

did knowingly combine, conspire, confederate, and agree with each other and with other persons, known and unknown, to defraud the United States, namely a federal agency, the United States Department of Agriculture,

In violation of Title 18, United States Code, Section 371.

COUNT 2

(Defrauding the Supplemental Nutrition Assistance Program)

From in or around February 2019 through in and around July 2019, in Camden County, in the District of New Jersey and elsewhere, defendant

JUAN MELO

did knowingly use and acquire Supplemental Nutrition Assistance Program benefits funded by the United States Department of Agriculture, and by such conduct obtained approximately \$420 in a manner contrary to the statutes and regulations of the Supplemental Nutrition Assistance Program,

In violation of Title 7, United States Code, Section 2024(b).