

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

U.S. DISTRICT COURT  
DISTRICT OF NEW JERSEY  
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UNITED STATES OF AMERICA : Criminal No. 18- 161- Kbk  
v. :  
JORGE GUTIERREZ, : 18 U.S.C. §§ 371, 641, 1001(a)(2),  
AWILDA HENRIQUEZ, : 1028A(a)(1) and (c)(1),  
ROQUE BISONO, and : 1512(b)(3), and 18 U.S.C. § 2  
ALBERTO SANCHEZ : 18 U.S.C. § 981 and 26 U.S.C. § 2461  
:

**INDICTMENT**

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

**Count 1**  
**[18 U.S.C. § 371 - *Klein* Conspiracy]**

**The Defendants and Other Entities or Organizations**

1. At all times relevant to this Indictment:
  - a. Defendant JORGE GUTIERREZ was a resident of Merchantville, New Jersey, and at various times obtained U.S. Treasury Refund checks which he had others cash for him.
  - b. Defendant AWILDA HENRIQUEZ was a resident of Camden, New Jersey, and at various times obtained U.S. Treasury Refund checks which she had others cash for her.
  - c. Defendant ROQUE BISONO was a resident of Maple Shade, New Jersey, and at various times obtained U.S. Treasury Refund checks which he subsequently cashed for others using fraudulent identification.

d. Defendant ALBERTO SANCHEZ was a resident of Camden, New Jersey, and at various times cashed U.S. Treasury Refund checks for others using fraudulent identification.

e. Co-Conspirator 1, who was a co-conspirator but not named as a defendant herein, was a resident of Merchantville, New Jersey, and at various times obtained U.S. Treasury Refund checks which he/she subsequently cashed for others.

f. Co-Conspirator 2, who was a co-conspirator but not named as a defendant herein, was a resident of Willingboro, New Jersey, and was employed by the United States Postal Service as a Mail Carrier. The route on which Co-Conspirator 2 delivered United States Mail was located in Pennsauken, New Jersey.

g. Co-Conspirator 3, who was a co-conspirator but not named as a defendant herein, was a resident of Gloucester City, New Jersey, and was employed by the United States Postal Service as a Mail Carrier. The route on which Co-Conspirator 3 delivered United States Mail was located in Pennsauken, New Jersey.

h. Co-Conspirator 4, who was a co-conspirator but not named as a defendant herein, was a resident of Camden, New Jersey, and at various times cashed U.S. Treasury Refund checks for others using fraudulent identification.

i. Co-Conspirator 5, who was a co-conspirator but not named as a defendant herein, was a resident of Camden, New Jersey, and at various

times cashed U.S. Treasury Refund checks for others using fraudulent identification.

j. Co-Conspirator 6, who was a co-conspirator but not named as a defendant herein, was a resident of Camden, New Jersey, and at various times cashed U.S. Treasury Refund checks for others using fraudulent identification.

k. Co-Conspirator 7, who was a co-conspirator but not named as a defendant herein, was a resident of Camden, New Jersey, and at various times cashed U.S. Treasury Refund Checks for other using fraudulent identification.

l. Co-Conspirator 8, who was a co-conspirator but not named as a defendant herein, was a resident of Pennsauken, New Jersey, and assisted defendant JORGE GUTIERREZ in recruiting U.S. Postal Mail Carriers and at various times collected stolen mail with defendant ROQUE BISONO on behalf of defendant GUTIERREZ.

m. The Internal Revenue Service ("IRS") was a constituent agency of the Treasury Department and part of the Executive Branch of the Government, responsible for administering and enforcing the tax laws of the United States, and collecting taxes owed to the Treasury of the United States, and providing refunds of overpaid taxes.

n. The United States Postal Service ("USPS") was an independent agency of the United States Government responsible for, among other things, providing postal service in the United States.

o. Natural born citizens of the Commonwealth of Puerto Rico were, upon birth, automatically granted United States citizenship.

p. Citizens of the Commonwealth of Puerto Rico were, upon application, issued Social Security Numbers by the Social Security Administration.

q. Citizens of the Commonwealth of Puerto Rico who resided in Puerto Rico were not required to file tax returns with the IRS as long as all of the Puerto Rico resident's income was derived from sources in Puerto Rico.

r. Check Cashing Company 1 was a check cashing agency located in Brooklawn, New Jersey, and Check Cashing Company 2 was a check cashing agency located in Camden, New Jersey (collectively "the Check Cashing Companies"). The Check Cashing Companies were businesses engaged in, among other things, cashing checks for other people. The Check Cashing Companies typically charged a fee for this service. Generally, check cashing businesses enabled people to cash checks without having to go to a bank or otherwise have a bank account, as long as they had identification that matches the name on the check.

2. From in or about April 2014 to in or about August 2014, in Camden County, in the District of New Jersey and elsewhere, defendants

JORGE GUTIERREZ,  
AWILDA HENRIQUEZ,  
ROQUE BISONO, and  
ALBERTO SANCHEZ

did knowingly and intentionally conspire and agree with each other and with Co-Conspirators 1 through 8, and with others, known and unknown, to

defraud the United States, and to commit offenses against the United States, that is, to: (1) unlawfully possess mail and contents of mail, that was United States Treasury Checks, which had been stolen, taken, embezzled, and abstracted from the United States mail knowing the same to have been stolen, taken, embezzled, and abstracted from the United States Mail, contrary to Title 18, United States Code, Section 1708; and (2) embezzle, steal, purloin, and knowingly convert to their own use and the use of another, money, and things of value of the United States, namely fraudulently obtained United States Treasury Checks in the approximate amount of \$565,091, contrary to Title 18, United States Code, Section 641.

#### Object of the Conspiracy

3. The object of the conspiracy was for defendants JORGE GUTIERREZ, AWILDA HENRIQUEZ, ROQUE BISONO and ALBERTO SANCHEZ and other co-conspirators, both known and unknown, to obtain fraudulently generated United States Treasury Income Tax Refund Checks from USPS Employees, who stole and embezzled the tax refund checks from the United States Mail, and to cash the stolen United States Treasury Checks by using false and fraudulent means of identification.

#### Manner and Means of the Conspiracy

4. It was part of the conspiracy that, beginning at least as early as in or about April 2014, the conspirators obtained the personal identifying information—including the names and Social Security Numbers—of certain

individuals. Among other things, the conspirators obtained the Social Security Numbers of Puerto Rico citizens.

5. It was further part of the conspiracy that the conspirators filed with the IRS false and fraudulent Individual Income Tax Returns (collectively, the "Tax Returns"), using the identifying information of others, including Puerto Rico citizens, seeking federal tax refunds to which the conspirators were not entitled. The objective in doing so was to falsely and fraudulently generate income tax refund checks issued by the Treasury Department (the "Tax Refund Checks").

6. It was further part of the conspiracy that, while the conspirators used the personally identifying information of certain individuals, including Puerto Rico citizens, to generate the Tax Refund Checks, they had the Tax Refund Checks issued and sent to different addresses in and around the District of New Jersey and elsewhere that they controlled, including addresses in Pennsauken, New Jersey. The conspirators did this so that the Tax Refund Checks would be directed to addresses where they could retrieve them.

7. It was further part of the conspiracy that the conspirators recruited USPS Mail Carriers to steal from the United States Mail the Tax Refund Checks. The USPS Mail Carriers were paid for every United States Treasury check that was stolen.

8. It was further part of the conspiracy that the conspirators found "runners" or "check couriers" who cashed the Tax Refund Checks in a variety of ways, including at check cashing businesses.

9. It was further part of the conspiracy that the check couriers presented the Tax Refund Checks for cashing at various check cashing agencies, including the Check Cashing Companies. The check cashiers at the Check Cashing Companies cashed the Tax Refund Checks for a fee, and provided the net proceeds to the check courier who received the cash and delivered it to the conspirators. The check couriers received a fee for their part in cashing the Tax Refund Checks.

#### Overt Acts

In furtherance of the conspiracy and to effect its object, defendants JORGE GUTIERREZ, AWILDA HENRIQUEZ, ROQUE BISONO, and ALBERTO SANCHEZ and their co-conspirators, both known and unknown, committed the following overt acts, among others, in the District of New Jersey and elsewhere:

10. At some time in or about 2014, defendant JORGE GUTIERREZ separately approached defendant ROQUE BISONO and Co-Conspirator 1 and asked defendant BISONO and Co-Conspirator 1 to find mailmen that would steal Tax Refund Checks from the U.S. Mail stream.

11. In or about March 2014, defendant ROQUE BISONO and Co-Conspirator 8 approached Co-Conspirator 2 and asked him/her to steal Tax Refund Checks from his postal delivery route in Pennsauken, New Jersey.

12. Between on or about April 4, 2014 and on or about August 20, 2014, Co-Conspirator 2 stole approximately 93 Tax Refund Checks from the U.S. Mail that were supposed to be delivered to addresses in Pennsauken, New Jersey, and gave those checks to defendant ROQUE BISONO and others. For

each check, defendant BISONO and others paid Co-Conspirator 2 approximately \$50.

13. Between on or about May 8, 2014 and July 15, 2014, defendant AWILDA HENRIQUEZ provided various check couriers or runners, including defendant ALBERTO SANCHEZ, Co-Conspirator 4, Co-Conspirator 5, Co-Conspirator 6 and Co-Conspirator 7, with Tax Refund Checks and fraudulent identification documents, such as an Alien Permanent Resident Card, Social Security Card, or New Jersey Identification Card, and took them to check cashiers that she controlled. After cashing the Tax Refund Checks and receiving money, the runners gave the money to defendant HENRIQUEZ.

14. To cash the Treasury Checks stolen by Co-Conspirator 2, defendant JORGE GUTIERREZ recruited check couriers or runners, such as Co-Conspirator 1, to cash the Tax Refund Checks using fake identifications, such as an Alien Permanent Resident Card, Social Security Card, or New Jersey Identification Card.

15. At various times between on or about April 4, 2014 and on or about July 7, 2014, defendant JORGE GUTIERREZ gave Co-Conspirator 1 the stolen Tax Refund Checks to cash. Thereafter, Co-Conspirator 1 recruited other individuals to cash the stolen Tax Refund Checks. After the checks were cashed, the money was returned to defendant GUTIERREZ.

16. On or about May 17, 2014, defendant JORGE GUTIERREZ and defendant AWILDA HENRIQUEZ directed Co-Conspirator 4 to take Co-Conspirator 1 to cash a Tax Refund Check in Brooklawn, New Jersey.



Defendant GUTIERREZ gave Co-Conspirator 1 a Tax Refund Check and false identification to present to the teller. After cashing the check, Co-Conspirator 1 gave the money to defendant GUTIERREZ.

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

**COUNT 2**  
**[18 U.S.C. § 641 – Theft of Government Funds]**

1. Paragraphs 1 and 3 through 16 of Count 1 of this Indictment are incorporated as if set forth in full herein.

2. On or about May 17, 2014, in Camden County, in the District of New Jersey and elsewhere, defendant

**JORGE GUTIERREZ**

did knowingly and intentionally embezzle, steal, purloin, and convert to his own use and the use of another, and aid and abet the embezzling, stealing, purloining, and converting money, and things of value of the United States, namely, a United States Treasury Check in the approximate amount of \$6,324.

In violation of Title 18, United States Code, Section 641, and Title 18, United States Code, Section 2.

**COUNT 3**  
**[18 U.S.C. § 1028A – Aggravated Identity Theft]**

1. Paragraphs 1 and 3 through 16 of Count 1 of this Indictment are incorporated as if set forth in full herein.

2. On or about May 17, 2014, in Camden County, in the District of New Jersey and elsewhere, defendant

JORGE GUTIERREZ

did knowingly possess and use, and aid and abet the use, without lawful authority, a means of identification of another person, that is, the name, date of birth, and Social Security Number and Alien Permanent Resident card of I.R., during and in relation to a felony violation contained in Chapter 47, United States Code, to wit, the theft of public money and property, that is the United States Treasury Checks issued by the Internal Revenue Service based on false and fraudulent income tax returns, in violation of Title 18, United States Code, Section 641, and Title 18, United States Code, Section 2.

In violation of Title 18, United States Code, Sections 1028A(a)(1) and (c)(1).

**COUNTS 4 TO 16**  
**[18 U.S.C. § 641 – Theft of Government Funds]**

1. Paragraphs 1 and 3 through 16 of Count 1 of this Indictment are incorporated as if set forth in full herein.

2. On or about the dates located below, in Camden County, in the District of New Jersey and elsewhere, defendant

**AWILDA HENRIQUEZ**

did knowingly and intentionally embezzle, steal, purloin, and convert to her own use and the use of another, and aid and abet the embezzling, stealing, purloining, and converting money, and things of value of the United States, namely, United States Treasury Checks in the approximate amount set forth below:

<b>Count</b>	<b>Date U.S. Treasury Check Negotiated</b>	<b>Amount of U.S. Treasury Check</b>
4	May 8, 2014	\$7,989
5	May 25, 2014	\$7,728
6	May 28, 2014	\$6,197
7	May 31, 2014	\$6,239
8	June 5, 2014	\$6,270
9	June 9, 2014	\$6,263
10	June 11, 2014	\$6,267
11	June 13, 2014	\$6,235
12	June 16, 2014	\$6,196
13	June 15, 2014	\$6,148
14	June 27, 2014	\$5,532
15	July 15, 2014	\$6,343
16	June 19, 2014	\$5,517

In violation of Title 18, United States Code, Section 641, and Title 18,  
United States Code, Section 2.

**COUNTS 17 TO 29**  
**[18 U.S.C. § 1028A – Aggravated Identity Theft]**

1. Paragraphs 1 and 3 through 16 of Count 1 of this Indictment are incorporated as if set forth in full herein.

2. On or about the dates listed below, in Camden County, in the District of New Jersey and elsewhere, defendant

**AWILDA HERNANDEZ**

during and in relation to a felony violation contained in Chapter 47, United State Code, to wit, the theft of public money and property, that is, the United States Treasury Checks issued by the Internal Revenue Service based on false and fraudulent income tax returns, in violation of Title 18, United States Code, Section 641, did knowingly possess and use, and aid and abet the use, without lawful authority, a means of identification of another person, of the individuals set forth below:

<b>Count</b>	<b>Date U.S. Treasury Check Negotiated</b>	<b>Amount of U.S. Treasury Check</b>	<b>Initials of Identification Used/Check Courier</b>
17	May 8, 2014	\$7,989	K.R. (Co-Conspirator 4)
18	May 25, 2014	\$7,728	C.G. (Co-Conspirator 6)
19	May 28, 2014	\$6,197	B.M. (Co-Conspirator 6)
20	May 31, 2014	\$6,239	M.L.L. (Co-Conspirator 5)
21	June 5, 2014	\$6,270	G.S. (Co-Conspirator 5)
22	June 9, 2014	\$6,263	N.F. (Co-Conspirator 6)
23	June 11, 2014	\$6,267	S.R. (Co-Conspirator 4)
24	June 13, 2014	\$6,235	A.P.C. (Co-Conspirator 4)
25	June 16, 2014	\$6,196	A.P. (Co-Conspirator 6)
26	June 15, 2014	\$6,148	R.G. (Co-Conspirator 5)

27	June 27, 2014	\$5,532	A.S. (Co-Conspirator 5)
28	July 15, 2014	\$6,343	R.F. (Co-Conspirator 7)
29	June 19, 2014	\$5,517	T.W. (Co-Conspirator 6)

during and in relation to a felony violation contained in Chapter 47, United State Code, to wit, the theft of public money and property, that is the United States Treasury Checks issued by the Internal Revenue Service based on false and fraudulent income tax returns, in violation of Title 18, United States Code, Section 641 and Title 18, United States Code, Section 2.

In violation of Title 18, United States Code, Sections 1028A(a)(1) and (c)(1), and Title 18, United States Code, Section 2.

**COUNT 30**  
**[18 U.S.C. § 641 – Theft of Government Funds]**

1. Paragraphs 1 and 3 through 16 of Count 1 of this Indictment are incorporated as if set forth in full herein.

2. On or about August 20, 2014, in Camden County, in the District of New Jersey and elsewhere, defendant

ROQUE BISONO

did knowingly and intentionally embezzle, steal, purloin, and convert to his own use and the use of another, and aid and abet the embezzling, stealing, purloining, and converting money, and things of value of the United States, namely, a United States Treasury Check in the approximate amount of \$2,010.

In violation of Title 18, United States Code, Section 641, and Title 18, United States Code, Section 2.



**COUNT 31**  
**[18 U.S.C. § 1028A – Aggravated Identity Theft]**

1. Paragraphs 1 and 3 through 16 of Count 1 of this Indictment are incorporated as if set forth in full herein.

2. On or about August 20, 2014, in Camden County, in the District of New Jersey and elsewhere, defendant

ROQUE BISONO

did knowingly possess and use, without lawful authority, a means of identification of another person, that is, the name, date of birth, and Social Security Number of R.M., during and in relation to a felony violation contained in Chapter 47, United State Code, to wit, the theft of public money and property, that is the United States Treasury Checks issued by the Internal Revenue Service based on false and fraudulent income tax returns, in violation of Title 18, United States Code, Section 641.

In violation of Title 18, United States Code, Sections 1028A(a)(1) and (c)(1), and Title 18, United States Code, Section 2.

**COUNTS 32 AND 33**  
**[18 U.S.C. § 641 – Theft of Government Funds]**

3. Paragraphs 1 and 3 through 16 of Count 1 of this Indictment are incorporated as if set forth in full herein.

4. On or about the dates located below, in Camden County, in the District of New Jersey and elsewhere, defendant

ALBERTO SANCHEZ

did knowingly and intentionally embezzle, steal, purloin, and convert to his own use and the use of another, and aid and abet the embezzling, stealing, purloining, and converting money, and things of value of the United States, namely, United States Treasury Checks, in the approximate amount set forth below:

<b>Count</b>	<b>Date U.S. Treasury Check Negotiated</b>	<b>Amount of U.S. Treasury Check</b>
32	May 9, 2014	\$7,886
33	June 5, 2014	\$6,254

In violation of Title 18, United States Code, Section 641, and Title 18, United States Code, Section 2.

**COUNTS 34 AND 35**  
**[18 U.S.C. § 1028A – Aggravated Identity Theft]**

1. Paragraphs 1 and 3 through 16 of Count 1 of this Indictment are incorporated as if set forth in full herein.

2. On or about the date set forth below, in Camden County, in the District of New Jersey and elsewhere, defendant

ALBERTO SANCHEZ

during and in relation to a felony violation contained in Chapter 47, United State Code, to wit, the theft of public money and property, that is the United States Treasury Checks issued by the Internal Revenue Service based on false and fraudulent income tax returns, in violation of Title 18, United States Code, Section 641, did knowingly possess and use, without lawful authority, a means of identification of another person, of the individuals set forth below:

<b>Count.</b>	<b>Date U.S. Treasury Check Negotiated</b>	<b>Amount of U.S. Treasury Check</b>	<b>Initials of Identification Used</b>
34	May 9, 2014	\$7,886	I.M.H.
35	June 5, 2014	\$6,254	L.M.

In violation of Title 18, United States Code, Sections 1028A(a)(1) and (c)(1), and Title 18, United States Code, Section 2.

**COUNT 36**  
**[Tampering With a Witness/Victim - 18 U.S.C. § 1512(b)(3)]**

1. Paragraphs 1 and 3 through 16 of Count 1 of this Indictment are incorporated as if set forth in full herein.

2. At all times relevant to this Indictment:

a. The Internal Revenue Service, Criminal Investigation ("IRS-CI") was an agency of the United States Department of Treasury. IRS-CI had authority to investigate and enforce criminal laws relating to federal income taxes and money laundering.

b. The United States Postal Service, Office of Inspector General ("USPS-OIG") was the law enforcement component of the USPS. USPS-OIG had primary jurisdiction over matters involving employees of the USPS, and had authority to investigate and enforce criminal laws relating to mail carriers, including theft of mail.

c. Both an ongoing criminal investigation by IRS-CI and USPS-OIG and an official proceeding, as that term is defined by Title 18, United States Code, Section 1515(a)(1), were pending in the District of New Jersey.

3. Since in or about October 2014, IRS-CI and USPS-OIG conducted an investigation into the conspiracy to defraud the United States, theft of Government funds, theft of United States Mail by postal mail carriers, tax related offenses, and aggravated identity theft by the co-conspirators set forth in this Indictment and others.

4. On or about October 17, 2017, IRS-CI and USPS-OIG special agents arrested Co-Conspirator 5 in Camden County, New Jersey.

5. On or about October 19, 2017, defendant ALBERTO SANCHEZ sent Co-Conspirator 5 a text message assuring Co-Conspirator 5 that he/she was not going to “get locked up.”

6. On or about January 17, 2018, a newspaper wrote an article about Co-Conspirator 5’s arrest and pending criminal proceedings.

7. On or about January 17, 2018, defendant ALBERTO SANCHEZ and Co-Conspirator 5 exchanged a series of text messages that stated, in sum and substance:

a. Co-Conspirator 5: Yall really got me into some s\*\*t but trust me I will not go down alone . . . .

b. Defendant Sanchez: U got ur self in it smh how cute its gonna look with both of us locked up . . .

c. Co-Conspriator 5: Oh so u prefer for me to be locked rather than say I had no clue wtf wus going on or getting me a f\*\*\*ing later I see . . . . Cuz reality I had no f\*\*\*ing clue wtf was going on this s\*\*t crazy.

d. Defendant Sanchez: U a professional liar for other s\*\*t like when u got caught in new york with pito rite wat u said u was with savi smh **and now u dnt noe how to lie** tf . . . . im tell u they not gonna do nuffing dat nes paper s\*\*t just lieing bout s\*\*t dats all . . . I can see they got u in there pocket smh u need to be more smarter then dat yo rs.

e. Co-Conspirator 5: If I gotta do time I will but not for no f\*\*\*ing lie . . . this s\*\*t is serious u are talking about me being with another n\*\*\*a and lying to u WTF I can’t like to the f\*\*\*ing feds especially when s\*\*t is on f\*\*\*ing paper a bogus story I knew NOTHING ABOUT!!!!!!

f. Defendant SANCHEZ: Aint no bogus story dats wat happen . . . Da baby gonna be good u gotta stop thinking bout da worst yo nuffing gonna happen to u but probation dats it.

g. Co-Conspirator 5: Wtf u don’t give a f\*\*\* now you never did wtf makes u think u will when I’m f\*\*\*ing gone . . . . I hate u . . . .

BOGUS STORY!!! I DID NOT know it was f\*\*\*ing tax fraud in PR.

h. Defendant SANCHEZ: It say u did 4 checks dats not enuff for u to do years people did more then dat gordo ex girl got a year probation for sum s\*\*t like dat at da casinos she had way more money and got a year dats all stop being scared day wanna scare u dats all. **You don't know that if they said that the checks that you said that desperate times for desperate measures and you never said that** then you can't believe the f\*\*\*ing papers that's what I'm trying to tell you and you never said that then what makes you think you're lying on the papers come on you got to be smarter than that you got to think.

i. Co-Conspirator 5: part of wut u told me to SAY . . . that I did it cuz of hard times I didn't know that s\*\*t would come out like that.

j. Defendant SANCHEZ: U gonna be good rs they just wanna scare u dats all u gotta do is hold ur grounds they dnt noe s\*\*t **only wat u tell them dats all you said a guy came up to you while you was at the supermarket a guy asked you about his wife or whatever he ask you if you want to see if you want to do it again dats it.**

8. On or about January 17, 2018, in Camden County, in the District of New Jersey and elsewhere, defendant

ALBERTO SANCHEZ

did knowingly attempt to intimidate, threaten, corruptly persuade, and engage in misleading conduct by instructing Co-Conspirator 5 to withhold certain facts from federal law enforcement officials and to provide false information to federal law enforcement officials with the intent to hinder and prevent the communication to a law enforcement officer of information relating to the possible commission of a federal offense, that is, conspiracy to defraud the United States, theft of U.S. Mail, theft of Government funds and tax related offenses.

In violation of Title 18, United States Code, Section 1512(b)(3), and Title 18, United States Code, Section 2.

**COUNT 37**  
**[False Statements - 18 U.S.C. § 1001(a)(2)]**

1. Paragraphs 1 and 3 through 16 of Count 1 and paragraphs 2(a) and 2(b) of Count 34 of this Indictment are incorporated as if set forth in full herein.

2. On or about November 3, 2014, defendant ROQUE BISONO was interviewed by Special Agents of the IRS-CI and USPS-OIG regarding his involvement in the theft of Tax Refund Checks from the U.S. Mail and the theft of government funds. During that interview, defendant BISONO falsely stated multiple times that he was not involved with the theft of U.S. Mail, that he did not orchestrate the theft of U.S. Mail, and that he did not know that the envelopes he received from the U.S. Postal Letter Carrier contained Tax Refund Checks. Specifically, defendant BISONO stated:

- a. He did not know that they were government checks when he agreed to pick them up. He stated that he never asked what he was picking up or what the payments to the mail carrier were for, specifically.
- b. He only conducted the transactions with the mailman three (3) times.
- c. He did not know that the previous envelopes he received from the mailman contained U.S. Treasury checks.
- d. He never asked anyone for the type of stolen mail he received from the mailman.

3. Defendant ROQUE BISONO's statements and representations set forth in paragraph 2 above were false because, as defendant BISONO then and there knew, he had cashed fraudulent Tax Refund Checks.

4. On or about November 3, 2014, in Camden County, in the District of New Jersey, and elsewhere, defendant



ROQUE BISONO

did knowingly and willfully make materially false, fictitious, and fraudulent statements and representations, as set above in paragraph 2 of Count 35 of this Indictment, in a matter within the jurisdiction of the executive branch of the Government of the United States, namely a criminal investigation conducted by the United States Department of Justice, the IRS-CI and the USPS-OIG.

In violation of Title 18, United States Code, Section 1001(a)(2).

### **FORFEITURE ALLEGATION**

1. The United States hereby gives notice to defendant JORGE GUTIERREZ that, upon his conviction of the offense in violation of Title 18, United States Code, Section 641 charged in Count 2 of this Indictment, 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 all property, real and personal, involved in the offense, and all property traceable thereto, including but not limited to a sum of money equal to at least approximately \$6,324 in United States currency, representing the amount of proceeds obtained as a result of the offense.

2. If any of the above-described forfeitable property, as a result of any act or omission of defendant JORGE GUTIERREZ:

- 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 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of defendant JORGE GUTIERREZ up to the value of the forfeitable property described above.

Pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c).

### **FORFEITURE ALLEGATION**

1. The United States hereby gives notice to defendant AWILDA HENRIQUEZ that, upon her conviction of the offenses in violation of Title 18, United States Code, Section 641 charged in Counts 4 through 16 of this Indictment, 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 all property, real and personal, involved in those offenses, and all property traceable thereto, including but not limited to a sum of money equal to at least approximately \$83,204 in United States currency, representing the amount of proceeds obtained as a result of the offenses.

2. If any of the above-described forfeitable property, as a result of any act or omission of defendant AWILDA HENRIQUEZ:

- 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 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of defendant AWILDA HENRIQUEZ up to the value of the forfeitable property described above.

Pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c).

### **FORFEITURE ALLEGATION**

1. The United States hereby gives notice to defendant ROQUE BISONO that, upon his conviction of the offense in violation of Title 18, United States Code, Section 641 charged in Count 30 of this Indictment, 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 all property, real and personal, involved in the offense, and all property traceable thereto, including but not limited to a sum of money equal to at least approximately \$2,010 in United States currency, representing the amount of proceeds obtained as a result of the offense.

2. If any of the above-described forfeitable property, as a result of any act or omission of defendant ROQUE BISONO:

- 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 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of defendant ROQUE BISONO up to the value of the forfeitable property described above.

Pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c).

### **FORFEITURE ALLEGATION**

1. The United States hereby gives notice to defendant ALBERTO SANCHEZ that, upon his conviction of the offenses in violation of Title 18, United States Code, Section 641 charged in Counts 32 and 33 of this Indictment, 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 all property, real and personal, involved in those offenses, and all property traceable thereto, including but not limited to a sum of money equal to at least approximately \$14,140 in United States currency, representing the amount of proceeds obtained as a result of the offenses.

2. If any of the above-described forfeitable property, as a result of any act or omission of defendant ALBERTO SANCHEZ:

- 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 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of defendant ALBERTO SANCHEZ up to the value of the forfeitable property described above.



Pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c).

A TRUE BILL,

FOREPERSON

  
CRAIG CARPENITO  
United States Attorney

CASE NUMBER: 18-

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United States District Court  
District of New Jersey

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UNITED STATES OF AMERICA

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v.

JORGE GUTIERREZ,  
AWILDA HENRIQUEZ,  
ROQUE BISONO, and  
ALBERTO SANCHEZ

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INDICTMENT FOR  
18 U.S.C. § 371  
18 U.S.C. § 641  
18 U.S.C. § 1001  
18 U.S.C. § 1028A  
18 U.S.C. § 1512  
18 U.S.C. § 2  
Forfeiture - 18 U.S.C. § 981

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A True Bill,

  
Foreperson

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CRAIG CARPENITO  
U.S. ATTORNEY, NEWARK, NEW JERSEY

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JASON M. RICHARDSON  
CHRISTINA O. HUD  
ASSISTANT U.S. ATTORNEYS  
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(856) 757-5026

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USA-48AD8  
(Ed. 1/97)