

2018R00853/CDA

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA	:	Hon. Claire C. Cecchi
	:	
v.	:	Criminal No. 20-CR-1015
	:	
LOLA LARIOS,	:	18 U.S.C. § 1349
a/k/a "Michelle Jacobs"	:	
	:	<u>I N F O R M A T I O N</u>

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

COUNT ONE
(Conspiracy to Commit Wire Fraud)

Background

1. At various times relevant to this Information:
 - a. Defendant LOLA LARIOS, a/k/a "Michelle Jacobs," was a resident of Bergen County, New Jersey.
 - b. Premier Relocations LLC ("Premier"), was a household goods moving company located in Elmwood Park, New Jersey. Defendant LOLA LARIOS served as the manager of Premier. Premier operated its business and advertised its services using various names, including but not limited to, Premier, Metro Van Lines Inc., Astoria Motor Van Company, Lyon Moving, and Empire Move (collectively, the "Companies").
 - c. Defendant LOLA LARIOS, and other employees of the Companies (collectively, the "Co-Conspirators") engaged in a wire fraud scheme, pursuant to which the Co-Conspirators enriched themselves by

regularly extorting customers (the “Victims”) of the Companies to pay drastically increased fees for moving services after the Companies’ employees loaded the Victims’ goods onto the Companies’ trucks, placing the Victims in a vulnerable state and unable to refuse the Co-Conspirators’ demands.

The Conspiracy

2. From in or around January 2018 through in or around January 2019, in the District of New Jersey, and elsewhere, the defendant

**LOLA LARIOS,
a/k/a “Michelle Jacobs,”**

did knowingly and intentionally conspire and agree with others to devise a scheme and artifice to defraud and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, and for the purpose of executing such scheme and artifice, did transmit and cause to be transmitted by means of wire communications in interstate and foreign commerce, certain writings, signs, signals, pictures, and sounds, contrary to Title 18, United States Code, Section 1343.

Object of the Conspiracy

3. It was the object of the conspiracy for defendant LOLA LARIOS and the Co-Conspirators to fraudulently obtain money and property illegally through the wire fraud scheme described herein.

Manner and Means of the Conspiracy

4. It was part of the conspiracy to defraud that defendant LOLA LARIOS and the Co-Conspirators created the Companies, which were used interchangeably in an effort to hide the true identity of their primary moving

companies, Premier Relocations LLC and Metro Van Lines, which received numerous customer complaints and negative Internet reviews.

5. It was further part of the conspiracy that defendant LOLA LARIOS served as manager of the Companies and would quote Victims “low-ball” price estimates for moving household goods.

6. It was further part of the conspiracy that defendant LOLA LARIOS and the Co-Conspirators would quote the Victims a price to move the Victims’ household items and would accept deposit payments from the Victims over the phone via credit card.

7. It was further part of the conspiracy that at the time of the scheduled move, after accepting the Victims’ deposits, and after the Companies’ employees loaded the Victims’ household items onto the Companies’ moving trucks, the Companies’ employees, acting at the direction of defendant LOLA LARIOS and the Co-Conspirators, would drastically raise the price of the move (often two or three times that of the quoted estimate), and then refuse to deliver the Victims’ household items until they paid the increased price.

8. It was further part of the conspiracy that defendant LOLA LARIOS and the Co-Conspirators would threaten to keep or auction the Victims’ household goods until the inflated payment was made to the Companies.

9. It was further part of the conspiracy that defendant LOLA LARIOS and the Co-Conspirators used means of wire communications in interstate and foreign commerce to execute their scheme in that defendant LOLA LARIOS and

the Co-Conspirators transmitted the “low-ball” estimates and the inflated price demands through e-mail and telephone, and each time the Victims were coerced into making an inflated payment to the Companies, a wire communication was relayed from New Jersey to a different state.

All in violation of Title 18, United States Code, Section 1349.

FORFEITURE ALLEGATION

1. As a result of committing the conspiracy to commit wire fraud offense alleged in this Information, contrary to 18 U.S.C. § 1343, and in violation of 18 U.S.C. § 1349, defendant LOLA LARIOS shall forfeit to the United States, pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), any and all property constituting or derived from any proceeds the defendant obtained directly or indirectly as a result of the commission of said conspiracy offense, and all property traceable thereto, including but not limited to \$281,351 in United States currency.

Substitute Assets Provision

2. 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 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. § 982(b), to seek forfeiture of any other property of said defendant up to the value of the above forfeitable property.


CRAIG CARPENITO
United States Attorney

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v.

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a/k/a “Michelle Jacobs”**

INFORMATION FOR
18 U.S.C. § 1349

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