

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA	:	Hon.
	:	
v.	:	Criminal No. 21-
	:	
	:	
JEFFERSON ROBERT	:	18 U.S.C. § 1349
a/k/a "Johny Eto"	:	

**INFORMATION**

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

**BACKGROUND**

1. At various times relevant to this Information:
  - a. Defendant JEFFERSON ROBERT, a/k/a "Johny Eto" ("ROBERT") was a resident of New Jersey.
  - b. On or about March 27, 2020, the Coronavirus Aid, Relief, and Economic Security Act (the "CARES Act") was signed into law. The CARES Act created a new temporary federal unemployment insurance program called Pandemic Unemployment Assistance ("PUA"). PUA provided unemployment insurance benefits ("UIBs") for individuals who were not eligible for other types of unemployment (e.g., the self-employed, independent contractors, gig economy workers). The CARES Act also created a new temporary federal program called Federal Pandemic Unemployment Assistance ("FPUC") that

provided an additional \$600 weekly benefit to those eligible for PUA and regular UIBs.

c. The Washington State Employment Security Department (“ESD”) administered and managed the regular unemployment and PUA programs in the State of Washington. Subject to certain eligibility requirements, a person who was unemployed, but who used to be employed by an employer in the State of Washington, could apply to receive UIBs from the State of Washington.

d. Business email compromise (“BEC”) scams generally targeted businesses that regularly performed wire transfer payments. In the typical BEC scam, fraudsters compromised legitimate business email accounts through social engineering (such as email “spoofing”) or computer intrusion (such as a phishing email with a malicious link) to trick companies into conducting unauthorized transfers of funds.

e. Romance scams were confidence tricks involving feigning romantic intentions towards a victim, gaining their affection, and then using that goodwill to defraud that victim.

## THE CONSPIRACY

2. From at least in or about August 2019 through in or about October 2020, in the District of New Jersey and elsewhere, the defendant,

JEFFERSON ROBERT,  
a/k/a "Johny Eto,"

did knowingly and intentionally conspire with others to devise and intend to devise a scheme and artifice to defraud individuals, and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, and, for the purpose of executing and attempting to execute such scheme and artifice to defraud, did transmit and cause to be transmitted by means of wire communications in interstate and foreign commerce, certain writings, signs, signals, pictures, and sounds, including a May 12, 2020, wire transfer from a location in the State of Washington to a location in New Jersey, contrary to Title 18, United States Code, Section 1343.

## GOAL OF THE CONSPIRACY

3. The goal of the conspiracy was for Robert and his co-conspirators to enrich themselves by obtaining money from States, entities, and individuals through the submission of fraudulent UIB claims, engaging in BEC and romance scams, and filing false information with the Internal Revenue Service ("IRS").

MANNER AND MEANS OF THE CONSPIRACY

4. It was part of the conspiracy that:
  - a. Robert opened bank accounts with a fraudulent passport in another individual's name (the "Bank Accounts").
  - b. Robert and his co-conspirators caused an application to be made to ESD for UIBs in the name of Victim 1. In response, ESD caused UIBs to be deposited into one of the Bank Accounts.
  - c. Robert and his co-conspirators engaged in BEC scams, including causing a victim to transfer approximately \$28,000 into one of the Bank Accounts.
  - d. Robert and his co-conspirators took part in romance scams, including causing a victim to make five deposits into one of the Bank Accounts totaling approximately \$19,000.
  - e. Robert and his co-conspirators fraudulently obtained money from the IRS, for instance by causing the IRS to transfer payments in four victims' names in the amount of approximately \$31,000 into one of the Bank Accounts.
  - f. Once fraudulently obtained money was in the Bank Accounts, Robert moved the money, including through the purchase of money orders, out of the Bank Accounts.
  - g. Robert and his co-conspirators caused more than approximately \$700,000 in losses.

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

## **FORFEITURE ALLEGATION**

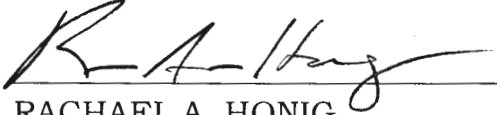
1. The allegations contained in this Information are incorporated by reference as though set forth in full herein for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c).

2. Upon conviction of the offense charged in this Information, the government will seek forfeiture from defendant ROBERT, in accordance with Title 28, United States Code, Section 2461(c), and Title 18, United States Code, Section 981(a)(1)(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 1349.

3. If by any act or omission of defendant ROBERT any of the property subject to forfeiture herein:

- 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,

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of defendant ROBERT up to the value of the property described in this forfeiture allegation.

  
RACHAEL A. HONIG  
ACTING UNITED STATES ATTORNEY