

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon.
 :
 v. : Crim. No. 22 -
 :
 ASHISH BAJAJ : 18 U.S.C. § 1349

I N F O R M A T I O N

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

(Conspiracy to Commit Wire Fraud)

Background

1. At all times relevant to this Information:
 - a. Defendant ASHISH BAJAJ was a foreign national from India residing in New York and California.
 - b. Victim-1 was a resident of California.
 - c. Victim-2 was a resident of Texas.
 - d. Victim-3 was a resident of Texas.
 - e. Bank-1 was headquartered in New York.
 - f. Bank-2 was headquartered in New York.
 - g. Bank-3 was headquartered in Texas.
 - h. Bank-4 was headquartered in California.

The Conspiracy

2. From in and around April 2020 through in and around August 2021, in the District of New Jersey, and elsewhere, defendant,

ASHISH BAJAJ,

knowingly and intentionally conspired and agreed with others to devise and intend to devise a scheme and artifice to defraud, and to obtain money and property from Victim-1, Victim-2, and Victim-3, 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, radio, and television communications in interstate and foreign commerce certain writings, signs, signals, pictures, and sounds, contrary to Title 18, United States Code, Section 1343, as set forth below.

Goal of the Conspiracy

3. The goal of the conspiracy was for BAJAJ and his co-conspirators to enrich themselves by engaging in a scheme to defraud elderly victims.

Manner and Means of the Conspiracy

4. It was part of the conspiracy that:

a. From in and around April 2020 through in and around August 2021, BAJAJ and his co-conspirators received over \$250,000 from a fraudulent scheme that involved the co-conspirators impersonating fraud prevention specialists from various banks, online retailers, and online payment companies located in the United States (collectively, "Account Providers").

b. BAJAJ's co-conspirators contacted hundreds of elderly victims located in New Jersey and elsewhere, and falsely claimed (1) that they were fraud prevention specialists employed by the Account Providers, (2) that the victims' accounts with the Account Providers were being targeted for fraud, and (3) that their

fraud prevention efforts required the victims' assistance in a sting operation to catch the perpetrators.

c. BAJAJ's co-conspirators asked elderly victims to send money from their bank accounts to accounts controlled by BAJAJ and falsely promised to return their money within a few days of the purported sting operation. The victims were also falsely promised that once they sent the money, the sting operation would result in the arrest of the purported perpetrators.

d. Based on these false promises, the elderly victims sent international wire transfers to BAJAJ at various banks located in India, China, Singapore, and the United Arab Emirates. The victims also sent interstate payments through an online application (the "Payment App") to approximately thirteen separate bank accounts held by BAJAJ in the United States. The victims further sent cash and cashier checks generated from interstate withdrawal transactions to BAJAJ at an address in California.

e. Ultimately, the scam resulted in losses to the elderly victims, including to Victim-1, Victim-2, and Victim-3, of over \$250,000.

Victim-1

f. In and around May 2020, Victim-1, approximately 65 years old, received telephone calls from an individual ("ND") identifying himself as an employee of the fraud department of Bank-1. ND told Victim-1 that Victim-1's various bank accounts had been targeted by fraud.

g. ND requested Victim-1's help in catching the purported fraudsters and instructed Victim-1 to send international wire transfers from her

Bank-1 account to a bank account in India, including an account associated with BAJAJ (the “BAJAJ India Account”). ND falsely assured Victim-1 that those funds would be returned to her account within a few days of initiating the wire transfers.

h. Based on these false assurances, Victim-1 wired over \$250,000 to BAJA and his co-conspirators, including approximately \$34,000 to the BAJAJ India Account. The funds were never returned.

Victim-2

i. In and around January 2021, Victim-2, approximately 70 years old, received an email purportedly from an online payment company (“Company-1”) congratulating her on a \$289.00 software purchase that she did not make. Victim-2 called a telephone number listed in the email and left a voice message to contest the transaction.

j. Victim-2 was subsequently contacted by a person (“DO”) who identified himself as a representative from the fraud department of Bank-2 where Victim-2 maintained a bank account.

k. DO falsely told Victim-2 that her PayPal account was the target of fraud and requested Victim-2’s help in a sting operation to catch the perpetrator by transferring approximately \$1,999 from her Bank-2 account to BAJAJ at Bank-4 using the Payment App. DO falsely promised Victim-2 that the Payment App to BAJAJ would be returned to her Bank-2 account in a few days.

l. Based on these false representations, Victim-2 transferred approximately \$1,999 to BAJAJ via the Payment App, and those funds were never returned.

Victim-3

m. In and around May 2021, Victim-3, approximately 68 years old, was contacted by a person ("JW") who identified herself as a representative from the security department of an online retailer ("Company-2"). JW falsely told Victim-3 that her Company-2 account was the target of fraud and requested Victim-3's help in a sting operation to catch the perpetrators.

n. JW instructed Victim-3 to withdraw cash from her bank account maintained by Bank-3 and to send it to, among others, BAJAJ at an address located in California. JW falsely promised that the withdrawals would be reimbursed.

o. Based on these false assurances, Victim-3 withdrew cash totaling approximately \$100,000 from Bank-3 and sent it to, among others, BAJA. Those funds were never returned.

In violation of Title 18, United States Code, Section 1349.

FORFEITURE ALLEGATION

1. The allegations contained in this Information are realleged and incorporated by reference for the purpose of alleging forfeiture, pursuant to Title 18, United States Code, Section 982(a)(2).

2. The United States gives notice to BAJAJ that, upon his conviction of the offense alleged in this Information, the government will seek forfeiture in accordance with Title 18, United States Code, Section 982(a)(2), which requires any person convicted of such an offense to forfeit any property, real or personal, which constitutes or is derived from proceeds obtained directly or indirectly as a result of such offense.

3. If any of the above-described forfeitable property, as a result of any act or omission of BAJAJ:

- 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 28, United States Code, Section 2461(c), to seek forfeiture of any other property of BAJAJ up to the value of the forfeitable property described above.


PHILIP R. SELLINGER
United States Attorney

CASE NUMBER: _____

United States District Court
District of New Jersey

UNITED STATES OF AMERICA

v.

ASHISH BAJAJ

INFORMATION FOR

18 U.S.C. § 1349

PHILIP R. SELLINGER
UNITED STATES ATTORNEY
FOR THE DISTRICT OF NEW JERSEY

BLAKE COPPOTELLI
ASSISTANT U.S. ATTORNEY
NEWARK, NEW JERSEY
(973) 856-9095
