

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA	:	Hon.
	:	
v.	:	Crim. No. 17-_____
	:	
MICHAEL ESPOSITO	:	18 U.S.C. § 1343

**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 all times relevant to this Information:
  - a. Defendant MICHAEL ESPOSITO ("ESPOSITO") was a resident of North Caldwell, New Jersey. Defendant ESPOSITO was the President of the following entities, among others, which purported to be in the business of purchasing consumer products in bulk from manufacturers for resale to wholesalers and retailers: AME Consulting Group, LLC; AME Group LLC; and AG Distributors Inc. (collectively, the "Esposito Entities").
  - b. "G.P." was an owner of a company based in North Carolina.

### The Scheme to Defraud

2. From at least as early as in or about August 2013 through in or about February 2017, in the District of New Jersey and elsewhere, defendant

MICHAEL ESPOSITO

did knowingly devise and intend to devise a scheme and artifice to defraud others, including G.P., K.A., D.M., N.C., D.C., and P.P., and to obtain money and property from these individuals by means of materially false and fraudulent pretenses, representations, and promises.

### Goal of the Scheme

3. The goal of the scheme and artifice to defraud was for defendant ESPOSITO to enrich himself by obtaining money from victims for work not performed and investments not made.

### Manner and Means of the Scheme

4. It was part of the scheme that defendant ESPOSITO had conversations with and caused emails to be sent to victims falsely detailing purported investment opportunities. According to ESPOSITO's false statements and emails, defendant ESPOSITO had the ability to purchase consumer goods, such as soda and bottled water, in bulk and at substantial discounts. Further, defendant ESPOSITO falsely claimed to have buyers lined up to whom he could sell these products at a profit. Defendant ESPOSITO also falsely stated that he needed funding to complete the transactions, and falsely stated that he would give the investor a large percentage of the profits

from these short-term deals if the investor funded the purchase of the goods involved in these transactions.

5. It was further part of the scheme that defendant ESPOSITO used investor funds not to purchase consumer goods but to further the scheme to defraud by: (a) paying other investors in order to make it appear as though he had invested in consumer goods for them; and (b) paying for his own personal expenses.

6. It was further part of the scheme that, using the manner and means described above, defendant ESPOSITO defrauded his victims in an amount more than \$1,500,000.

7. On or about August 12, 2013, for the purpose of executing and attempting to execute the aforesaid scheme and artifice to defraud, in the District of New Jersey, and elsewhere, defendant

MICHAEL ESPOSITO

knowingly and intentionally transmitted and caused to be transmitted by means of wire communications in interstate and foreign commerce, certain writings, signs, signals, pictures, and sounds, namely, an August 12, 2013, e-mail from defendant ESPOSITO, who was in New Jersey, to G.P., who was in North Carolina, outlining consumer goods allegedly available for sale.

In violation of Title 18, United States Code, Section 1343.

### Forfeiture Allegation

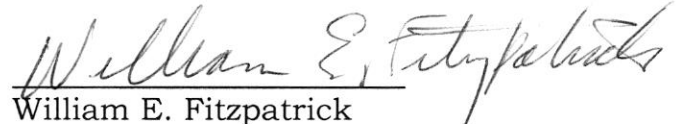
1. The allegations contained in this Information are realleged and incorporated by reference as though set forth in full herein for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461.

2. Upon conviction of the offense charged in this Information, defendant ESPOSITO shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of the offense, and all property traceable to such property.

3. If by any act or omission of defendant MICHAEL ESPOSITO 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,

the United States shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

  
William E. Fitzpatrick  
Acting U.S. Attorney

**CASE NUMBER:** \_\_\_\_\_

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**UNITED STATES OF AMERICA**

**v.**

**MICHAEL ESPOSITO**

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**INFORMATION FOR**

18 U.S.C. § 1343

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**WILLIAM E. FITZPATRICK**

*ACTING UNITED STATES ATTORNEY  
NEWARK, NEW JERSEY*

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