UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA	:	Hon.
	:	
v.	:	Criminal Number:
	:	
SHEVANDRA VERASAWMI and VISHALLIE VERASAWMI	:	18 U.S.C. §§ 1349, 1341, & 2

I N D I C T M E N T

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

COUNT ONE
(Mail Fraud Conspiracy)

1. At all times relevant to this Indictment:

Individuals and Entities

a. Victim Company 1 was a provider of medical services based in or around New Brunswick, New Jersey. Victim Company 1 had numerous vendors that it paid each month. The Accounts Payable department at Victim Company 1 managed paying Victim Company 1's vendors.

b. Defendant VISHALLIE VERASAWMI ("VISHALLIE") resided in or around Green Brook, New Jersey and was employed at Victim Company 1 as a financial analyst.

c. Defendant SHEVANDRA VERASAWMI ("SHEVANDRA") resided in or around Matawan, New Jersey and was the brother of defendant VISHALLIE.

d. SDICC LLC ("SDICC") was a New Jersey limited liability company incorporated on or about April 26, 2016, by defendant SHEVANDRA, who is listed on the State Certificate of Formation under "Members/Managers. SDICC's location is listed as 730 South Avenue, Middlesex, New Jersey ("730 South Avenue").

e. CHS Health Services LLC ("CHS") was a New Jersey limited liability company incorporated on or about June 28, 2016, by defendant SHEVANDRA, who is listed on the State Certificate of Formation under "Members/Managers." CHS's location was also listed as 730 South Avenue.

The Conspiracy

2. From at least as early as in or about April 2016 through in or about August 2016, in Mercer and Somerset Counties, in the District of New Jersey, and elsewhere, defendants

SHEVANDRA VERASAWMI
and
VISHALLIE VERASAWMI

did knowingly and intentionally conspire and agree with each other and with others to devise a scheme and artifice to defraud and to obtain money and property from Victim Company 1 by means of materially false and fraudulent pretenses, representations, and promises, and, for the purpose of executing the scheme and artifice to defraud, to knowingly and intentionally place and cause to be placed in a post office and authorized depository of mail, and cause to be sent and delivered by the United States Postal Service, certain mail matter.

3. The principal goal of the conspiracy was for defendants

SHEVANDRA and VISHALLIE and others (the "Co-Conspirators") to enrich themselves unlawfully by causing Victim Company 1 to pay fraudulent invoices for non-existent services (the "Fraudulent Invoices") to companies the Co-Conspirators controlled, including SDICC and CHS (the "Fake Vendors").

Manner and Means of the Conspiracy

4. It was part of the conspiracy that the Co-Conspirators, including defendant SHEVANDRA, incorporated the Fake Vendors, which in fact never had any contracts for goods or services with Victim Company 1, and indeed were merely shell companies. Defendant SHEVANDRA was listed on the signature cards for bank accounts of the Fake Vendors.

5. It was further part of the conspiracy that defendant VISHALLIE directed Fake Vendor SDICC to be added to the accounts payable system of Victim Company 1.

6. It was further part of the conspiracy that the Co-Conspirators, including defendants SHEVANDRA and VISHALLIE, submitted dozens of Fraudulent Invoices for payment by Victim Company 1 with a "remit payment" address at 730 South Avenue. In fact, no monies were owed by Victim Company 1 to the Fake Vendors.

7. It was further part of the conspiracy that certain of the Fraudulent Invoices were emailed to Victim Company 1, from an individual supposedly named "Steve Vhargass" — a similar name to one listed on defendant VISHALLIE's job application as a reference from a prior job.

8. It was further part of the conspiracy that other Fraudulent Invoices were mailed using the facilities of the United States Postal Service.

9. It was further part of the conspiracy that the Co-Conspirators, including defendant SHEVANDRA, deposited checks from Victim Company 1, representing payments by Victim Company 1 of certain Fraudulent Invoices, into the bank accounts of the Fake Vendors.

10. It was further part of the conspiracy that certain Co-Conspirators transferred proceeds of the conspiracy from the accounts of Fake Vendors to bank accounts controlled by defendant SHEVANDRA.

11. It was further part of the conspiracy that defendant SHEVANDRA transferred proceeds of the conspiracy from bank accounts controlled by defendant SHEVANDRA to bank accounts controlled by defendant VISHALLIE.

12. It was further part of the conspiracy that in or about July 2016, defendant SHEVANDRA provided an $85,000 cashier's check, obtained after withdrawing $85,000 from a bank account controlled by defendant SHEVANDRA, to defendant VISHALLIE.

13. It was further part of the conspiracy that using the manner and means described above, among others, defendants SHEVANDRA and VISHALLIE, and others, attempted to divert millions of dollars belonging to Victim Company 1.

14. It was further part of the conspiracy that defendants SHEVANDRA and VISHALLIE, and others, spent the proceeds of the conspiracy on their own

personal uses, including luxury cars and credit card payments.

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

<u>COUNTS TWO THROUGH FOUR</u>
(Mail Fraud)

1. The allegations set forth in Paragraphs 1 and 4 through 14 of Count One above are hereby repeated, realleged, and incorporated as if fully set forth herein.

2. On or about the dates set forth below, in Mercer and Somerset Counties, in the District of New Jersey, and elsewhere, having devised and intending to devise a scheme and artifice to defraud and to obtain money and property from individual victims by means of materially false and fraudulent pretenses, representations, and promises, for the purpose of executing and attempting to execute the scheme and artifice, defendants

SHEVANDRA VERASAWMI
and
VISHALLIE VERASAWMI

did place and cause to be placed in a post office and authorized depository of mail, and cause to be sent and delivered by the United States Postal Service, certain mail matter, each constituting a separate count of this Indictment:

Count	Approximate Date	Description
Two	August 8, 2016	Mailing of fraudulent invoice number 09659102 to Victim Company 1 from SDICC LLC falsely claiming $37,983.10 was "past due."
Three	August 8, 2016	Mailing of fraudulent invoice number 09659105 to Victim Company 1 from SDICC LLC falsely claiming $27,689.20 was "past due."
Four	August 8, 2016	Mailing of fraudulent invoice number 09659111 to Victim Company 1 from SDICC LLC falsely claiming $36,673.50 was "past due."

In violation of Title 18, United States Code, Section 1341 and Section 2.

FORFEITURE ALLEGATION

(18 U.S.C. §§ 1341, 1349 – Mail Fraud and Mail Fraud Conspiracy)

1. The allegations contained in Counts One through Four of this Indictment are hereby realleged and incorporated by reference for the purpose of noticing forfeiture pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c).

2. Upon conviction of the offenses charged in Counts One through Four of this Indictment, defendants SHEVANDRA and VISHALLIE shall forfeit to the United States, pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of said offenses, and all property traceable thereto, including but not limited to a sum of money equal to $1,066,829.57 representing the proceeds of the offenses charged in Counts One through Four of this Indictment, and all right, title, and interest of the defendants in the following:

(a) One 2016 BMW 750Li xDrive sedan, VIN WBA7F2C5XGG421125.

Substitute Asset Provision

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

(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 28 U.S.C. § 2461(c), to seek forfeiture of any other property of defendants SHEVANDRA and VISHALLIE up to the value of the forfeitable property.

A True Bill,

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Foreperson

William E. Fitzpatrick

WILLIAM E. FITZPATRICK
Acting United States Attorney

CASE NUMBER: ____________

United States District Court
District of New Jersey

UNITED STATES OF AMERICA

v.

SHEVANDRA VERASAWMI and
VISHALLIE VERASAWMI

INDICTMENT FOR

18 U.S.C. § 1349
18 U.S.C. § 1341

A True Bill,

____

Foreperson

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