

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Criminal No.
:
: 18 U.S.C. § 1623(a) and (c)
v. :
: INFORMATION
DEBORA MEDEIROS DA SILVA :
:

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

1. On or about May 17, 2011, in Essex County, in the District of New Jersey, and elsewhere, defendant,

DEBORA MEDEIROS DA SILVA,
while under oath as a witness in a proceeding then being tried before the United States District Court for the District of New Jersey entitled United States v. Peter Ventricelli and Mark Ventricelli, Crim. No. 09-0863, knowingly made false material declarations which were inconsistent with prior material declarations made by defendant DEBORA MEDEIROS DA SILVA while testifying under oath in a proceeding before a duly empaneled and sworn grand jury for the United States District Court for the District of New Jersey, such material declarations being inconsistent to the degree that one of them is necessarily false.

2. It was material to each of the proceedings described in paragraph 1 to determine whether Peter Ventricelli possessed certain firearms.

3. Defendant DEBORA MEDEIROS DA SILVA on or about the September 23, 2009, while appearing as a witness under oath before the federal grand jury in the District of New Jersey, knowingly testified with respect to material matters as follows:

Q: Now the same day that Peter Ventricelli ripped up these two checks and he threw them in the garbage?

A: Yes.

Q: Did he come to your apartment, or go with you to your apartment?

A: Yeah, after I left the job he said - I was going home anyway, but he went with me. Then he went to, to my room and he said he had to get something, and he got a bag with -

Q: Let's first do this slowly. Where was the bag?

A: In the closet.

Q: The closet in your bedroom?

A: Yeah, my bedroom.

Q: In the apartment that you were then sharing with your -

A: My father and his friend.

Q: And the friend. Did you know that he had this bag in your closet?

A: No, I didn't know because he has his own key to the house and he never told me about it till that day.

Q: And could you describe the bag, what it looked like?

A: It was like a gym bag, blue bag.

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Q: And did you see what was inside of the bag?

A: Yeah.

Q: How did that come about, that you got to see what was inside the bag?

A: Because I asked him to open the bag.

Q: And what was inside the bag?

A: Guns.

Q: How many guns would you say?

A: About four or five guns.

Q: And had you known that Peter Ventricelli had stored these guns in a bag in your apartment?

A: No, I didn't know.

Q: What happened next with the bag and the guns?

A: He wanted to ask my manager at the - at the restaurant I was worked to hide it in his house, but I said to him, no. Then he called his brother, Mark, and gave to him the bag.

3. Defendant DEBORA MEDEIROS DA SILVA, on or about May 17, 2011, while under oath as a witness in United States v. Peter Ventricelli and Mark Ventricelli, Crim. No. 09-0863, knowingly testified with respect to a material matter as follows:

Q: Miss Da Silva, the guns we're talking about, did you see guns?

A: No.

Q: So, when [the transcript of your grand jury testimony] says, [A:] "I asked him to open the bag." [Q:] "And what

was inside the bag?" was the question, and you said [A] "Guns."


[Q:] "How many guns would you say?" [A:] "About four or five guns."

Did you ever see guns in a bag; just yes or no ma'am?

A: No.

4. These material declarations of defendant DEBORA MEDEIROS DA SILVA quoted in paragraphs 2 and 3 herein were irreconcilably contradictory and were material to the point in question in each of the proceedings before which such declarations were made.

In violation of Title 18, United States Code, Section 1623(a) and (c).



PAUL J. FISHMAN
United States Attorney

CASE NUMBER: 12-

**United States District Court
District of New Jersey**

UNITED STATES OF AMERICA

v.

DEBORA MEDEIROS DA SILVA

INFORMATION FOR

18 U.S.C. § 1623(a) and (c)

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