

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Criminal No. 14-
 :
 : Hon. Anne E. Thompson
 v. :
 : 18 U.S.C. § 371
 ROSANNA RODRIGUEZ :

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:

Background

1. At all times relevant to this Information:

a. Defendant ROSANNA RODRIGUEZ was the head teller at Bank 1, located in Perth Amboy, New Jersey.

The Conspiracy

2. From in or about August 2012 through in or about December 2012, in the District of New Jersey, and elsewhere, defendant

ROSANNA RODRIGUEZ

did knowingly and intentionally conspire and agree with others to commit an offense against the United States, that is to embezzle, steal, purloin, and knowingly convert to her own use and the use of others, money of the United States, specifically

United States Treasury checks in the approximate amount of \$940,000.00 contrary to Title 18, United States Code, Section 641.

Object of the Conspiracy

3. The object of the conspiracy was for defendant ROSANNA RODRIGUEZ and her co-conspirators to obtain and ultimately cash income tax refund checks that were stolen, and to use the resulting illicit cash proceeds for their personal benefit.

Manner and Means of the Conspiracy

4. It was part of the conspiracy that beginning at least as early as August 2012 and continuing through in or about December 2012, members of the conspiracy obtained Treasury checks in the names of individuals whose identities were used without their consent ("Treasury Checks").

5. It was further part of the conspiracy that ROSANNA RODRIGUEZ cashed the Treasury Checks against unknowing third-party bank accounts at Bank 1 that had sufficient balances against which to cash the checks.

6. It was further part of the conspiracy, that ROSANNA RODRIGUEZ provided the proceeds of the cashed checks to co-conspirator R.V.

7. It was further part of the conspiracy, that co-conspirator R.V. paid ROSANNA RODRIGUEZ approximately 2% of the amount of each check cashed by ROSANNA RODRIGUEZ.

Overt Acts

8. In furtherance of the conspiracy and to effect the unlawful object thereof, defendant ROSANNA RODRIGUEZ and her co-conspirators committed and caused to be committed the following overt acts in the District of New Jersey and elsewhere:

a. On or about October 15, 2012, ROSANNA RODRIGUEZ cashed Treasury Check number 315839760602 in the amount of \$6,392.00.

b. On or about November 19, 2012, ROSANNA RODRIGUEZ cashed Treasury Check number 315839365141 in the amount of \$6,283.00.

c. On or about December 6, 2012, ROSANNA RODRIGUEZ cashed Treasury Check number 315840122483 in the amount of \$7,067.00.

In violation of Title 18, United States Code, Section 371.

FORFEITURE ALLEGATION

1. The allegations contained in this Information are hereby realleged and incorporated by reference for the purpose of noticing forfeiture pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

2. As the result of committing the conspiracy offense charged in this Information, pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c), defendant ROSANNA RODRIGUEZ shall forfeit to the United States, jointly and severally with her conspirators, all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of the said conspiracy offense, and all property traceable thereto, including, but not limited to, a sum of money equal to \$940,000, representing the proceeds of the offense charged in Count One of this Information.

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

- 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 such defendant up to the value of the forfeitable property described in paragraph 2.



PAUL J. FISHMAN
UNITED STATES ATTORNEY