

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon.
 :
 v. : Crim. No. 14-
 :
 VIJAY VERMA : 18 U.S.C. § 1029(a)(5) and § 2

INFORMATION

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

1. The defendant and others participated in a credit card “bust out” scheme. Pursuant to the scheme, certain individuals (the “Scheme Participants”) created false identities and fraudulent identification documents, which they used to obtain credit cards (the “Fraud Cards”) from banks and other financial institutions (the “Card Issuers”). Certain Scheme Participants then used Fraud Cards at complicit businesses, including jewelry stores in and around Jersey City, New Jersey (the “Complicit Businesses”), to purchase goods or services, or to obtain cash in amounts less than the amounts charged on the Fraud Cards. The Scheme Participants failed to pay off the balances they incurred using the Fraud Cards, causing losses to the Card Issuers.

2. At all times relevant to this Information:

a. Defendant VIJAY VERMA resided in or around Iselin, New Jersey, and owned and operated Raja Jewelers, a Complicit Business located in or around Jersey City, New Jersey, where he allowed certain Scheme

Participants to charge the Fraud Cards and shared the profits from the fraudulent charges with certain Scheme Participants.

b. The Fraud Cards were “access devices,” as that term is defined in Title 18, United States Code, Section 1029(e)(1).

3. From in or about 2003 through in or about February 2013, in the District of New Jersey, and elsewhere, defendant

VIJAY VERMA

did knowingly and with intent to defraud, effect transactions with one or more access devices, namely Fraud Cards, issued to another person or persons, and by such conduct did obtain payment and things of value, aggregating \$1,000 or more during a one-year period, namely approximately \$204,907.24 in 2008, in a manner affecting interstate commerce.

In violation of Title 18, United States Code, Section 1029(a)(5) and Section 2.

FORFEITURE ALLEGATION

1. The allegations contained in this Information are hereby realleged and incorporated by reference for the purpose of noticing forfeitures pursuant to Title 18, United States Code, Sections 982(a)(2)(A).

2. Upon conviction of the offense charged in this Information, VIJAY VERMA, the defendant, shall forfeit to the United States:

(a) Pursuant to Title 18, United States Code, Section 982(a)(2)(A), any and all property constituting or deriving from proceeds obtained directly or indirectly as a result of such offense, including but not limited to at least approximately \$579,125.31, a sum of money representing the amount of proceeds obtained as a result of said offense.

3. The property subject to forfeiture includes, but is not limited to, all right, title and interest of the defendant in any and all gold and gold jewelry seized from Raja Jewelers, located at 820 Newark Ave., Jersey City, NJ on or about February 4, 2013.

Substitute Asset Provision

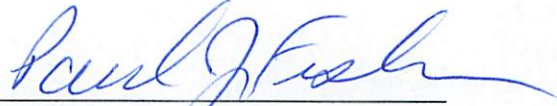
4. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- (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 18, United States Code, Section
982(b)(1), to seek forfeiture of any other property of the defendant up to the value
of the forfeitable property described in this forfeiture allegation.

All pursuant to Title 18, United States Code, Sections 982(a)(2)(A) and (b)
and Title 21, United States Code, Section 853(p).



PAUL J. FISHMAN
United States Attorney

CASE NUMBER:

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

UNITED STATES OF AMERICA

v.

VIJAY VERMA

INFORMATION FOR

18 U.S.C. § 1029(a)(5)

PAUL J. FISHMAN

U.S. ATTORNEY

NEWARK, NEW JERSEY

ZACH INTRATER

DANIEL V. SHAPIRO

ASSISTANT U.S. ATTORNEYS

(973)645-2728

(973)353-6087

USA-48AD 8

(Ed. 1/97)