

c. Rose Martins (“Martins”), a co-conspirator not charged in this Information, resided in New Jersey and worked for DeAlmeida at the Graduate School in a support staff role.

The Conspiracy

2. From at least in or around 2009 through in or around July 2022, in the District of New Jersey and elsewhere, the defendant,

SILVIA CARDOSO,

did knowingly and intentionally conspire with DeAlmeida, Martins, and others to devise a scheme and artifice to defraud and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, and, for the purpose of executing and attempting to execute such scheme and artifice to defraud, to transmit and cause to be transmitted by means of wire communication in interstate and foreign commerce, certain writings, signs, signals, pictures, and sounds, contrary to Title 18, United States Code, Section 1343.

Goal of the Conspiracy

3. The goal of the conspiracy was for CARDOSO, DeAlmeida, and Martins (collectively, the “Conspirators”), together with each other and others, to enrich themselves by using their positions at the Graduate School to fraudulently misappropriate funds from the Graduate School.

Manner and Means of the Conspiracy

4. It was part of the conspiracy that:

a. The Conspirators utilized their positions at the Graduate School

to fraudulently misappropriate more than \$1.3 million from the Graduate School through a variety of methods.

b. *Unauthorized Gift Card and Prepaid Debit Card Purchases.*

DeAlmeida and Martins, aided by CARDOSO, directed multiple Graduate School vendors to purchase hundreds of thousands of dollars of gift cards for the Conspirators' benefit, including prepaid debit cards and gift cards to clothing stores, coffee chains, and other retail outlets. DeAlmeida and Martins then directed the vendors to bill the Graduate School for the gift cards and prepaid debit cards through false and fraudulent invoices that described products or services that were not actually provided to the Graduate School. DeAlmeida ultimately approved the false invoices for payment by the Graduate School, and the Conspirators, including CARDOSO, used the gift cards on personal expenses. For example:

i. In or around 2010, DeAlmeida and Martins caused a Graduate School vendor ("Company-1") to purchase gift cards for the Conspirators and seek reimbursement for those gift cards from the Graduate School through false invoices that concealed the true nature of the charges. Based on these false and fraudulent invoices, from in or around November 2010 through in or around July 2011, the Graduate School paid Company-1 more than approximately \$63,000, which, unknown to the Graduate School, covered the cost of gift cards that DeAlmeida and Martins solicited and received from Company-1. The Coconspirators, including CARDOSO, subsequently misused these gift cards on personal expenses.

ii. DeAlmeida, Martins, and CARDOSO also solicited and received gift cards from a Graduate School merchandise vendor (“Company-2”), which the Conspirators then used on personal expenses. They caused Company-2 to submit invoices to the Graduate School that omitted information about those gift cards and instead included false descriptions of products that were not provided to the Graduate School. Based on these false invoices, from in or around 2009 through in or around 2022, the Graduate School paid Company-2 more than approximately \$417,000, which, unknown to the Graduate School, covered the cost of gift cards that the Conspirators received.

iii. For example, in or around 2021, DeAlmeida and Martins, aided by CARDOSO, caused Company-2 to submit three invoices to the Graduate School totaling more than \$47,000, which falsely stated they were for the purchase of personal protective equipment (“PPE”). In reality, Company-2 did not provide this PPE to the Graduate School, and the invoices were used to cover the cost of gift cards that the Conspirators received from Company-2. Based on these false invoices, the Graduate School paid Company-2 approximately \$47,000.

iv. DeAlmeida and Martins also caused a Graduate School catering vendor (“Company-3”) to buy them gift cards and receive payment for those gift cards from the Graduate School through false invoices.

v. DeAlmeida directed Martins to purchase thousands of gift cards from the university bookstore using the Graduate School credit account or DeAlmeida’s Graduate School Card. The Conspirators, including CARDOSO, split

those gift cards among themselves and used them for their personal benefit. At times, DeAlmeida fraudulently approved charging those purchases to the Graduate School, and Martins forged the signatures of Graduate School employees on internal approvals for the transactions. From in or around 2017 through in or around 2022, the Conspirators misappropriated more than \$200,000 from the Graduate School to purchase gift cards from the university bookstore for the benefit of the Conspirators.

vi. During the scheme, CARDOSO used thousands of dollars of these fraudulently obtained gift cards to make personal purchases.

vii. When confronted by Graduate School investigators in or around August 2022, CARDOSO admitted that she understood that taking the gift cards was wrong.

c. *No Show Jobs.* DeAlmeida caused Graduate School vendors to make regular payments to the Conspirators and fraudulently seek reimbursement from the Graduate School for these payments using false invoices.

i. For example, from in or around 2009 through in or around 2013, DeAlmeida caused a Graduate School vendor (“Company-4”) to make periodic payments to CARDOSO and Martins, even though they performed no actual services for Company-4. DeAlmeida and Martins caused Company-4 to submit false invoices to the Graduate School for these purported services. Based on those false and fraudulent invoices, the Conspirators caused the Graduate School to pay Company-4 more than approximately \$200,000.

ii. DeAlmeida also caused Company-3 to pay Individual-1, another Graduate School employee, and to charge the Graduate School for those amounts using false invoices. Based on these false invoices, from in or around 2021 through in or around July 2022, the Graduate School paid Company-3 more than approximately \$20,000.

d. *Retailers.* The Conspirators, including CARDOSO, used DeAlmeida's Graduate School Card to make unauthorized personal purchases and then falsified the Graduate School's books and records to conceal the true nature of the expenses. For example, DeAlmeida and Martins used DeAlmeida's Graduate School Card to purchase more than \$70,000 in personal items, such as women's shoes, smart watches, and bed linens, at an online retailer (the "Online Retailer"), which items were shipped directly to the homes of DeAlmeida and Martins. At times, to cover up their fraud, DeAlmeida and Martins fraudulently altered the Online Retailer's receipts to reflect different items than were actually purchased. When entering the expenses into the Graduate School's accounting system, DeAlmeida and Martins falsely classified the expenses to make it appear as though they were legitimate business expenses when they were not.

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

FORFEITURE ALLEGATION

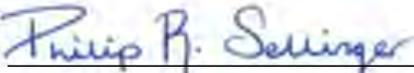
As the result of committing the wire fraud conspiracy offense as charged in this Information, the defendant, SILVIA CARDOSO, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1) and Title 28, United States Code, Section 2461(c), all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of the wire fraud conspiracy offense charged in this Information, and all property traceable to such property.

SUBSTITUTE ASSETS PROVISION

If any of the property described above, 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,

the United States shall be entitled, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c), to forfeiture of any other property of the defendants up to the value of the above-described forfeitable property.



PHILIP R. SELLINGER
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District of New Jersey