

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA	:	Hon.
	:	
v.	:	Crim. No. 24-
	:	
DIANA VALTERI	:	18 U.S.C. § 1343
	:	18 U.S.C. § 1957

**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:

**COUNT ONE**  
**(Wire Fraud)**

1. At all times relevant to this Information:
  - a. Defendant Diana Valteri (“VALTERI”) resided in Sparta, New Jersey.
  - b. VALTERI was the purported owner of Diana Valteri Accounting (“Valteri Accounting”) and DValteri a/k/a DValteri Best Service (“DValteri”), both of which were shell companies that had no actual business operations.
  - c. Bank 1 is a financial institution headquartered in New York, New York.
  - d. Bank 2 is a financial institution headquartered in San Francisco, California. VALTERI and her spouse held a joint personal checking account at Bank-2.

**Economic Injury Disaster Loan Program (“EIDL”)**

- e. The Coronavirus Aid, Relief, and Economic Security (“CARES”)

Act was a federal law enacted in or around March 2020 designed to provide emergency financial assistance to millions of Americans suffering economic effects caused by the COVID-19 pandemic. One source of relief provided by the CARES Act was the authorization of the Economic Injury Disaster Loan (“EIDL”) program. EIDL was a Small Business Administration (“SBA”) program that provided low-interest financing to small businesses, renters, and homeowners in regions affected by declared disasters.

f. In order to obtain an EIDL, a qualifying business was required to submit an application to the SBA and provide information about its operations, such as the number of employees, gross revenues for the 12-month period preceding the disaster, and cost of goods sold in the 12-month period preceding the disaster. In the case of EIDLs for COVID-19 relief, the 12-month period constituted the 12 months preceding January 31, 2020. In addition, the business entity must have existed in an operational condition on February 1, 2020.

g. The amount of the EIDL was determined based, in part, on the information the applicant provided regarding the revenue, employees, and cost of goods of the company. The SBA directly issued any funds disbursed under an EIDL to the applicant company. A company was permitted to use EIDL funds for payroll expenses, sick leave, production costs, and business obligations, such as debts, rent, and mortgage payments.

### **The Scheme to Defraud**

2. From in or around July 2020 through in or around August 2020, in the District of New Jersey and elsewhere, defendant

## **DIANA VALTERI**

knowingly and intentionally devised and intended to devise a scheme and artifice to defraud the SBA, and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, as set forth below.

### **Goal of the Scheme to Defraud**

3. The goal of the scheme was for VALTERI to enrich herself by submitting fraudulent loan applications to obtain federal COVID-19 emergency relief funds from the SBA that were meant for distressed small businesses.

### **Manner and Means of the Scheme to Defraud**

4. It was part of the scheme that:

a. On or about July 21, 2020, VALTERI submitted an EIDL application (“Application-1”) to the SBA on behalf of Valteri Accounting seeking a loan for approximately \$150,000. Application-1 contained materially false and fraudulent statements concerning Valteri Accounting’s number of employees, cost of goods sold, and annual gross revenue for the purported business. In reality, Valteri Accounting was a shell company with no employees or business operations.

b. On or about August 7, 2020, based on the false and fraudulent representations and omissions submitted by VALTERI in Application-1, the SBA disbursed approximately \$150,000 into VALTERI’s personal checking account at Bank-1, which VALTERI used for personal purposes.

c. Also, on or about August 7, 2020, VALTERI submitted an EIDL application on behalf of DValteri (“Application-2”) to the SBA, which contained materially false and fraudulent misrepresentations concerning DValteri’s number of

employees, cost of goods sold, and annual gross revenue for the purported business. In reality, DValteri was a shell company with no employees or business operations.

d. On or about August 11, 2020, based on the false and fraudulent representations and omissions submitted by VALTERI in Application-2, the SBA disbursed approximately \$150,000 into VALTERI's personal checking account, which VALTERI used for personal purposes.

#### **Execution of the Scheme to Defraud**

5. On or about August 11, 2020, in the District of New Jersey and elsewhere, defendant

#### **DIANA VALTERI**

for the purpose of executing the scheme described above, caused to be transmitted by means of wire communication in interstate commerce certain writings, signs, signals, pictures, and sounds, namely a wire transfer of approximately \$150,000 in EIDL funds from the SBA into VALTERI's personal account.

In violation of Title 18, United States Code, Section 1343.

**COUNT TWO**  
**(Money Laundering)**

6. The allegations in paragraphs 1, 3, and 4 of this Information are realleged here.

7. On or about August 11, 2020, in the District of New Jersey and elsewhere, defendant

**DIANA VALTERI**

knowingly engaged in a monetary transaction by, through, and to a financial institution, affecting interstate and foreign commerce, in criminally derived property of a greater value than \$10,000, that is, the transfer of approximately \$25,000 from VALTERI's personal checking account at Bank-1 to a joint checking account at Bank-2, such property having been derived from a specified unlawful activity, that is, wire fraud.

In violation of Title 18, United States Code, Section 1957.

**FORFEITURE ALLEGATION AS TO COUNT ONE**

1. Upon conviction of the offense in violation of Title 18, United States Code, Section 1343, as charged in Count One of this Information, defendant DIANA VALTERI shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the commission of such offense.

**FORFEITURE ALLEGATION AS TO COUNT TWO**

2. Upon conviction of the offense in violation of Title 18, United States Code, Section 1957, as charged in Count Two of this Information, defendant DIANA VALTERI shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(1), any property, real or personal, involved in such offense, or any property traceable to such property.

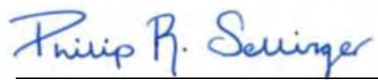
**SUBSTITUTE ASSETS PROVISION**  
**(Applicable to All Forfeiture Allegations)**

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 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 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 the defendant up to the value of the above forfeitable property.



---

PHILIP R. SELLINGER  
United States Attorney

CASE NUMBER: 24-\_\_\_\_\_

---

---

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

---

---

**UNITED STATES OF AMERICA**

v.

**DIANA VALTERI**

---

---

**INFORMATION FOR**

**18 U.S.C. § 1343**

**18 U.S.C. § 1957**

---

---

**PHILIP R. SELLINGER**  
UNITED STATES ATTORNEY  
FOR THE DISTRICT OF NEW JERSEY

---

---

**FATIME MEKA CANO**  
**AJA ESPINOSA**  
ASSISTANT U.S. ATTORNEYS  
NEWARK, NEW JERSEY  
973-856-9384

---

---