

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon.  
 :  
 v. : Crim. No. 14-  
 :  
 VINOD DADLANI : 18 U.S.C. § 1349

INFORMATION

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

INTRODUCTION

1. The defendant and others (collectively, the “Co-Conspirators”) participated in a credit card “bust out” scheme. Pursuant to the scheme, the Co-Conspirators 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”). The Co-Conspirators 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 Co-Conspirators 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 VINOD DADLANI resided in or around Lyndhurst,

New Jersey, and owned and operated Nikitas Inc., d/b/a "Tanishq Jewels," a Complicit Business located in or around Jersey City, New Jersey, where he allowed Co-Conspirators to use the Fraud Cards.

b. The Card Issuers were "financial institutions," as that term is defined in Title 18, United States Code, Section 20.

### THE CONSPIRACY

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

VINOD DADLANI

did knowingly and intentionally conspire and agree with others to execute a scheme and artifice to defraud financial institutions, and to obtain moneys, funds, credits, assets, securities, and other property owned by, and under the custody and control of, those financial institutions, by means of materially false and fraudulent pretenses, representations, and promises, contrary to Title 18, United States Code, Section 1344.

### OBJECT OF THE CONSPIRACY

4. It was the object of the conspiracy for defendant VINOD DADLANI and his Co-Conspirators to profit by unlawfully obtaining money and property through use of the Fraud Cards.

### MANNER AND MEANS OF THE CONSPIRACY

5. It was part of the conspiracy that certain Co-Conspirators used fake Social Security numbers, Social Security numbers belonging to others, and other fraudulent identification documents to create false identities (the "Fraud

Identities”).

6. It was further part of the conspiracy that certain Co-Conspirators obtained certain Fraud Cards by, among other things, applying for those Fraud Cards in the names of certain Fraud Identities.

7. It was further part of the conspiracy that certain Co-Conspirators increased the credit available on certain Fraud Cards and to certain Fraud Identities by making the minimum payments for an extended period of time and by monitoring and manipulating the credit histories of these Fraud Identities.

8. It was further part of the conspiracy that the Co-Conspirators defrauded the Card Issuers of millions of dollars by running up large credit card charges on the Fraud Cards, which they never repaid.

9. It was further part of the conspiracy that certain Co-Conspirators charged certain Fraud Cards at the Complicit Businesses, where the owners of the Complicit Businesses, including defendant VINOD DADLANI, permitted these Co-Conspirators to fraudulently charge these Fraud Cards and shared the profits from the fraudulent charges.

10. It was further part of the conspiracy that certain Co-Conspirators created sham companies that did little or no legitimate business (the “Sham Companies”) and then obtained credit card terminals for the Sham Companies, which they used to run up charges on certain Fraud Cards. While the Card Issuers paid the Sham Companies for these alleged transactions, the Co-Conspirators did not pay the Card Issuers for these fraudulent charges,

resulting in losses to the Card Issuers.

11. It was further part of the conspiracy that certain Co-Conspirators funneled a portion of the illicit profits from the scheme to themselves by writing checks from the Sham Companies to themselves or to accounts created using certain Fraud Identities that they controlled.

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

## 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, VINOD DADLANI, 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 \$411,000, 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 Nikitas, Inc., d/b/a "Tanishq Jewels," located at 804 Newark Ave., Jersey City, NJ on or about February 4, 2013.

### Substitute Asset Provision

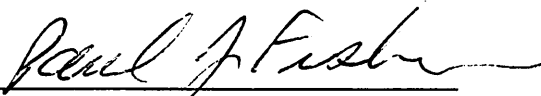
4. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- (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.**

**VINOD DADLANI**

**INFORMATION FOR**

18 U.S.C. § 1349

**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)**