

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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	:	
UNITED STATES OF AMERICA	:	<u>INFORMATION</u>
	:	
- v. -	:	12 Cr.
	:	
NELSON RUIZ,	:	
	:	
Defendant.	:	
	:	
- - - - -	x	

COUNT ONE

The United States Attorney charges:

1. From at least in or about 2008, up to and including in or about June 2012, in the Southern District of New York and elsewhere, NELSON RUIZ, the defendant, willfully and knowingly, having devised and intending to devise a scheme and artifice to defraud, and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises, for the purpose of executing such scheme or artifice and attempting to do so, did place in a post office and authorized depository for mail matter, a matter and thing to be sent and delivered by the Postal Service and did deposit and cause to be deposited a matter and thing to be sent and delivered by private and commercial interstate carrier, and did take and receive therefrom, such matter and thing, and did knowingly cause to be delivered by mail and such carrier according to the direction thereon, such matter and thing, to wit, RUIZ engaged in a scheme to defraud the New York City Department of Education

("DOE") by fraudulently billing for, and ultimately receiving from the DOE, more than \$2.5 million for sign language interpreting services that were not provided.

(Title 18, United States Code, Section 1341.)

COUNT TWO

The United States Attorney further charges:

2. From at least in or about 2008, up to and including in or about June 2012, in the Southern District of New York and elsewhere, NELSON RUIZ, the defendant, willfully, knowingly, and corruptly gave, offered, and agreed to give something of value to a person, with the intent to influence and reward an agent of a local government agency, to wit, the DOE, that received, in any one year period, benefits in excess of \$10,000 under a Federal program involving a grant, contract, subsidy, loan, guarantee, insurance, or other form of Federal assistance, in connection with any business, transaction, or series of transactions of such local government agency involving anything of value of \$5,000 or more to wit, RUIZ made monthly cash payments to a DOE employee in exchange for that employee's assistance in processing and expediting fraudulent invoices that RUIZ submitted for sign language interpreting services that were not provided.

(Title 18, United States Code, Section 666(a)(2).)

FORFEITURE ALLEGATION

3. As a result of committing the offenses alleged in Counts One and Two of the Information, NELSON RUIZ, the defendant, shall forfeit to the United States, pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461, all property, real and personal, that constitutes or is derived, directly or indirectly, from gross proceeds traceable to the commission of the said offenses, including, but not limited to, a sum of money equal to at least \$2,720,860 in United States currency in that such sum in aggregate constitutes the amount of proceeds traceable to the commission of the offenses, comprised in part by the following property:

- i. All funds held at TD Bank in the name of Ameriwalk Solutions and/or Edna Gomez Ruiz and/or Nelson Ruiz in account number 3453916476;
- ii. All funds held at TD Bank in the name of Ameriwalk Solutions and/or Edna Gomez Ruiz and/or Nelson Ruiz in account number 3452543250;
- iii. All funds held at TD Bank in the name of Perfect Link Interpreting Services in account number 4253331650;

- iv. All funds held at TD Bank in the name of Perfect Link Interpreting Services and/or Jim He and/or Nelson Ruiz Jr. in account number 7920418675;
- v. All funds held at TD Bank in the name of Related Service Solutions and/or Nelson Ruiz and/or Edna G. DaSilva in account number 7922639740;
- vi. All funds held at TD Bank in the name of Bilingual Words in Motion and/or Chayna Newsome and/or Nelson Ruiz in account number 4266702848;
- vii. All funds held at TD Bank in the name of Comprehensive Bilingual Services and/or Daniel Rodriguez and/or Nelson Ruiz in account number 4263073078;
- viii. All funds held at TD Bank in the name of Deaf & Hard of Hearing Interpreting Spanish and/or William Cruz and/or Nelson Ruiz in account number 7915951631;
- ix. All funds held at TD Bank in the name of Nelson Ruiz in account number 7920161275; and

- x. All funds held at TD Bank in the name of Nelson Ruiz and/or Edna G. Da Silva in account number 7922777060;

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 person;

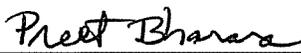
(c) has been placed beyond the jurisdiction of the Court;

(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 18 U.S.C. § 982(b), to seek forfeiture of any other property of said defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Sections 981 and 982, and Title 28, United States Code, Section 2461.)



PREET BHARARA
United States Attorney

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(18 U.S.C. §§ 666, 1341)

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United States Attorney.
