

UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT

UNITED STATES OF AMERICA

- v. -

JEFFREY WARGA,
Defendant.

Crim. No. *3:14cr240 MPS*

VIOLATION: 18 U.S.C. § 1349
(Conspiracy to commit wire fraud)

INFORMATION

The United States Attorney charges:

COUNT ONE

(Conspiracy to commit wire fraud)

1. At all times relevant to this Information, the defendant JEFFREY WARGA (“WARGA”) resided in Rhode Island and was the president and owner of Bay Components, LLC.

2. From approximately July 2005 until November 2008, Bay Components, LLC was a company located in Rhode Island that made material misrepresentations about parts it sold to its customers, and, among other things, sold counterfeit electronic parts to a Connecticut company (“CT Company”).

3. From approximately July 2005 until November 2008, in the District of Connecticut and elsewhere, WARGA, and others known and unknown, did knowingly and willfully conspire, combine, confederate, and agree together to devise a scheme and artifice to defraud CT Company, and to obtain money and property by means of materially false and fraudulent pretenses, representations and promises, and by material omissions, namely, WARGA and his co-conspirators knowingly did transmit and cause to be transmitted by means of wire communication in interstate and foreign commerce a writing, sign, signal, picture, or sound for the purpose of executing such scheme and artifice, contrary to Title 18, United States Code,

Section 1343.

4. It was a part and an object of the conspiracy that WARGA, and others known and unknown, willfully and knowingly engaged in a scheme and artifice to defraud their business customers by means of materially false and fraudulent representations, including among other things by falsely representing to customers, including CT Company, that the electronic parts WARGA and his co-conspirators sold:

- a. were not from Asia when, in fact, WARGA and his co-conspirators knew the parts had been purchased from companies located in Asia;
- b. were new parts from the original manufacturer, when, in fact, WARGA and his co-conspirators knew the parts were used; and
- c. were authentic parts when, in fact, WARGA and his co-conspirators knew the parts were counterfeit parts.


5. It was a part and an object of the conspiracy that WARGA and others, known and unknown, sent e-mails from WARGA's email account in Rhode Island to CT Company's email account in Connecticut.

All in violation of Title 18, United States Code, Section 1349.

UNITED STATES OF AMERICA



DEIRDRE M. DALY
UNITED STATES ATTORNEY



FELICE M. DUFFY
ASSISTANT UNITED STATES ATTORNEY