UNITED STATES DISTRICT COURT

DISTRICT OF CONNECTICUT

FILED

UNITED STATES OF AMERICA

Crim. No. 3:15CR

- V. -

VIOLATION: 18 U.S.C. § 1343

JEFFREY KRANTZ,

(Wire Fraud) Defendant.

INFORMATION

The United States Attorney charges:

COUNT ONE (Wire Fraud)

At all times relevant to this Information:

- The defendant JEFFREY KRANTZ ("JEFF KRANTZ") resided in New 1. York and was the CEO and an owner of Harry Krantz, LLC.
- 2. Harry Krantz, LLC was a company located in New York that bought and sold, among other things, obsolete electronic parts for ultimate use by the U.S. Military and commercial buyers.
- Jeffrey Warga ("Warga") resided in Rhode Island and was the 3. president and owner of Bay Components, LLC.
- Bay Components, LLC was a company located in Rhode Island that 4. bought and sold, among other things, obsolete electronic parts for ultimate use by the U.S. Military and commercial buyers.
- A company located in Connecticut ("CT Company"), as part of its 5. business, purchased, among other things, electronic parts for use in components of

commercial and military aircraft engines.

The Scheme to Defraud

6. From approximately March 2006 until approximately October 2008, in the District of Connecticut and elsewhere, JEFF KRANTZ devised and intended to devise and participated in a scheme and artifice to defraud, and to obtain money and property by means of materially false and fraudulent pretenses, representations and promises.

The Purpose of the Scheme to Defraud

7. The purpose of the scheme to defraud was for JEFF KRANTZ to enrich himself and advance the financial success of Harry Krantz, LLC by defrauding the CT Company by means of materially false and fraudulent pretenses, representations and promises.

The Execution of the Scheme

- 8. The manner and means by which JEFF KRANTZ sought to and did execute the scheme to defraud included, among other things, the following:
- 9. In about July 2005, JEFF KRANTZ entered into a business relationship with Warga of Bay Components to sell obsolete military microprocessor chips ("chips") to Bay, who would in turn sell them to the CT Company.
- 10. In about August 2005, JEFF KRANTZ met with Warga and representatives from the CT Company at Harry Krantz, LLC to discuss the business arrangement.
 - 11. At all times thereafter, JEFF KRANTZ knew that the CT Company

wanted new and original chips, not falsely remarked chips that purported to be something they were not.

- 12. Between 2005 and 2008, JEFF KRANTZ ultimately purchased and sold, and caused to be purchased and sold, over a thousand chips to Bay, who in turn sold them to the CT Company.
- 13. The chips were marked with certain information, including a certain manufacturer's name and trademark, a date code, and a military part number.
- 14. In about December 2005, the first shipments of about 330 chips that JEFF KRANTZ had sold to Bay were rejected by the CT Company for being the wrong part because the chip contained the wrong die inside.
- 15. In 2006, JEFF KRANTZ replaced those chips with at least some of the replacement chips bearing the date code 9832.
- 16. Between 2006 and 2008, JEFF KRANTZ sold and caused to be sold at least 900 chips with date code 9832 to Bay that were ultimately destined for the CT Company -- the majority of which were sold to the CT Company -- that JEFF KRANTZ knew were falsely remarked and were not the original chips of the certain manufacturer as represented by the markings on the chip.
- 17. For the purpose of executing and attempting to execute the aforesaid scheme and artifice to defraud on or about March 22, 2006, in the District of Connecticut and elsewhere, JEFF KRANTZ did knowingly cause to be transmitted by means of wire communication in interstate commerce an email sent from Warga's email account in Rhode Island to the CT Company's email account in

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Connecticut and to JEFF KRANTZ's email account in New York.

All in violation of Title 18, United States Code, Section 1343.

UNITED STATES OF AMERICA

DEIRDRE M. DALY

UNITED STATES ATTORNEY

FELICE M. DUFFY

ASSISTANT UNITED STATES ATTORNEY