

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

UNITED STATES OF AMERICA	:	Criminal No. 12-
	:	
v.	:	18 U.S.C. §§ 1349 and 2
	:	
ROSE L. CRABBE	:	
	:	
	:	<b><u>INFORMATION</u></b>
	:	

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

1. At all times relevant to this Information, defendant ROSE L. CRABBE and a coconspirator ("CC-1") were employed in administrative capacities at a law firm in Middlesex County, New Jersey (the "LAW FIRM"). In his/her capacity as an administrative employee of the LAW FIRM, CC-1 had access to various financial accounts of the LAW FIRM, including attorney trust and business accounts of the LAW FIRM.

**The Scheme and Artifice to Defraud**

2. From in or about February 2005 to in or about September 2007, in Middlesex County, in the District of New Jersey, and elsewhere, defendant

ROSE L. CRABBE

did knowingly and intentionally conspire and agree with CC-1 to devise a scheme and artifice to defraud the LAW FIRM of money and property, namely, approximately \$788,981.36, by means of materially false and fraudulent pretenses, representations, and promises, contrary to Title 18, United States Code, Section 1341.

### Object of the Scheme and Artifice to Defraud

3. The object of the conspiracy was for defendant ROSE L. CRABBE and CC-1 to enrich themselves by embezzling funds out of the LAW FIRM's attorney trust and business accounts without the knowledge of the LAW FIRM attorneys and using those embezzled funds for their own personal benefit.

### The Manner and Means of the Scheme and Artifice to Defraud

4. It was part of the conspiracy that defendant ROSE L. CRABBE and CC-1 used their administrative positions at the LAW FIRM to cause checks to be issued from the LAW FIRM's attorney trust and business accounts directly to their creditors in order to pay their personal expenses, including credit card bills, real estate taxes, and child care expenses.

5. It was further part of the conspiracy that CC-1 caused checks to be issued from the LAW FIRM's trust account payable to clients of the LAW FIRM, forged the clients' endorsements on the back of the checks, and then deposited those checks into bank accounts that CC-1 controlled.

6. It was further part of the conspiracy that defendant ROSE L. CRABBE and CC-1 caused checks to be issued from the LAW FIRM's trust and/or business accounts payable to themselves and then negotiated these checks, including by depositing the checks into bank accounts they controlled. With respect to some of these checks, CC-1 accessed the LAW FIRM's financial accounting system and altered the payee information for these checks, in an attempt to conceal their unlawful conduct.

7. It was further part of the conspiracy that from in or about February 2005 to in or about September 2007, for the purpose of executing and attempting to execute this scheme and artifice to defraud, defendant ROSE L. CRABBE did knowingly cause to be placed in a post

office and authorized depository for mail matter to be sent and delivered by the Postal Service, including the following checks drawn against the LAW FIRM's attorney trust account:

<u>Date (on or about)</u>	<u>Mailing</u>
July 27, 2007	Check number 9152 in the amount of \$177.06 payable to HSBC Card Services for the benefit of an account ending in 1559
August 5, 2007	Check number 9174 in the amount of \$624.47 payable to Washington Mutual Card Services for the benefit of an account ending in 5269
August 5, 2007	Check number 9175 in the amount of \$541.25 payable to Capital One for the benefit of an account ending in 2154

8. It was further part of the conspiracy that on or about September 6, 2007, for the purpose of executing and attempting to execute this scheme and artifice to defraud, CC-1 did deposit two checks drawn against the LAW FIRM'S attorney trust account in the amounts of \$1,125 and \$1,949.

9. It was further part of the conspiracy that on or about September 12 and or 13, 2007, for the purpose of executing and attempting to execute this scheme and artifice to defraud, defendant ROSE L. CRABBE and CC-1 met in person to discuss concealing their scheme from the LAW FIRM.

All in violation of Title 18, United States Code, Section 1349 and Section 2.



PAUL J. FISHMAN  
United States Attorney