

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Criminal No. 22-
 :
 v. :
 :
 GARBITA MITRA : 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:

The Defendant and Co-Conspirator

1. At all times relevant to this Information:
 - a. Defendant GARBITA MITRA (“defendant MITRA”), was an Indian citizen who resided in Florida and New Jersey.
 - b. Arushobike Mitra, who is named as a co-conspirator but not as a defendant herein, also was an Indian citizen who resided in Florida and New Jersey.

The Conspiracy

2. From at least in or about May 2019 through in or about November 2019, in Hudson County, in the District of New Jersey, and elsewhere, defendant

GARBITA MITRA

did knowingly and intentionally conspire and agree with Arushobike Mitra and

others to devise a scheme and artifice to defraud multiple victims, and to obtain money and property from multiple victims by means of materially false and fraudulent pretenses, representations, and promises, which scheme and artifice is set forth below, and for the purpose of executing such scheme and artifice, did transmit and cause to be transmitted by means of wire communications in interstate and foreign commerce, certain signs, signals, and sounds, contrary to Title 18, United States Code, Section 1343.

The Object of the Conspiracy

3. It was the object of the conspiracy for defendant MITRA, Arushobike Mitra, and other conspiracy members to enrich themselves by using a variety of schemes and frauds to trick and coerce predominantly elderly victims into mailing or wiring cash to members of the conspiracy.

Manner and Means of the Conspiracy

4. As part of the conspiracy, unknown individuals operating call centers believed to be in India typically made contact with a victim in the United States by way of an automated, previously recorded call, commonly referred to as a “robocall.” The robocalls purported to be from a U.S. government or law enforcement agency—e.g., the Social Security Administration, the Internal Revenue Service, or the Federal Bureau of Investigation—and conveyed alarming messages, such as the consumer’s Social Security number or other personal information had been compromised, or the consumer was otherwise connected to an investigation involving

criminal activity. In reality, the consumer was neither under investigation nor in legal jeopardy, and the same threatening robocall was made simultaneously to thousands of other American consumers.

5. It was further part of the conspiracy that, when a victim answered one of these robocalls or returned a voicemail message, one or more members of the conspiracy would then speak with the victim and convince the victim they were speaking with a government official or law enforcement agent. The conspirator(s) offered to “resolve” these legal matters by immediate transfers of funds to settle the purported legal obligation, or to hold the consumer’s assets temporarily until the crisis could be resolved.

6. It was further part of the conspiracy that the conspirator(s) then tricked and coerced the victims to send cash to an address, supposedly belonging to a law enforcement or government agency. The victims were directed by the conspirator(s) to send cash via mail or a parcel delivery service to an address that the conspirators provided. Members of the conspiracy commonly referred to as “money mules” would then pick up the cash shipments, sometimes presenting counterfeit identifications. The money mules would then keep a small portion of the cash for themselves and transferred the bulk of the money to higher-level members of the conspiracy via wire transfers into various bank accounts or transmitted the funds using the informal money transfer system known as hawala.

7. It was further part of the conspiracy for conspirators commonly to

employ another technique involving refund fraud and remote computer access. In this scenario, one or more members of the conspiracy gained remote access to a victim's computer. It was part of the conspiracy that either a pop-up window appeared on the victim's computer displaying a phone number to call for "internet technical support services;" or the victim received a telemarketing call informing the victim that their previously purchased anti-virus software was not up to date.

8. It was further part of the conspiracy that, once the victim called the number displayed on their computer screen and/or followed the instructions of the tech support representative, the victim was told that the anti-virus and/or protection they previously purchased was not sufficient for the victim's computer and, as a result, they were entitled to a refund. The conspirator(s) convinced the victim that the refund could be issued via wire directly into the victim's bank account, but in order to do so, the victim was told, they must provide the conspirator(s) remote access to their computer.

9. It was further part of the conspiracy that, once a victim granted the conspirator(s) access to the victim's computer, the conspirator(s) moved United States currency from one of the victim's financial accounts to the victim's checking account, thus reflecting a significantly higher balance. As result of the transfer, the conspirator(s) advised the victim they were mistakenly overpaid—which the victim believed given the higher balance in their checking account—and convinced the victim that they must send the

money back via wire transfer and/or cash in the mail, as described above. The victim did not realize that the higher balance in their checking account was actually from their own funds transferred from another one of their accounts.

10. During the course of these wire transfer fraud schemes, money mules in the conspiracy would open bank accounts and the victims were advised to wire the funds into the money mules' accounts. The money mules would then keep a small portion of the funds for themselves and forward the remaining funds to higher-level members of the conspiracy as described in paragraph 6, above.

11. In furtherance of the conspiracy, defendant MITRA and Arushobike Mitra operated as money mules in Florida and New Jersey.

12. It was part of the conspiracy that, between in or about May 2019 and November 2019, defendant MITRA and Arushobike Mitra opened bank accounts at bank branches in Florida and New Jersey.

- a. Defendant MITRA maintained a personal checking account at Bank 1 ending in 6182. The account was opened on or about May 24, 2018 in Florida.
- b. Arushobike Mitra maintained a personal checking account at Bank 2 ending in 3267. The account was opened on or about March 29, 2019 in Florida.
- c. Defendant MITRA maintained a personal checking account at

Bank 2 ending in 4356. The account was opened on or about May 2, 2019 in Florida.

- d. Arushobike Mitra maintained a personal checking account at Bank 3 ending in 9786. The account was opened on or about May 23, 2019 in Florida.
- e. Defendant MITRA maintained a personal checking account at Bank 3 ending in 2357. The account was opened on or about May 30, 2019 in Florida.
- f. Arushobike Mitra maintained a personal checking account at Bank 4 ending in 4390. The account was opened on or about June 7, 2019 in Florida.
- g. Defendant MITRA maintained a personal checking account at Bank 4 ending in 7691. The account was opened on or about June 7, 2019 in Florida.
- h. Defendant MITRA maintained a personal checking account at Bank 5 ending in 4175. The account was opened on or about June 26, 2019 in New Jersey.
- i. Arushobike Mitra maintained a personal checking account at Bank 6 ending in 0806. The account was opened on or about June 26, 2019 in New Jersey.
- j. Arushobike Mitra maintained a personal checking account at Bank 7 ending in 8536. The account was opened on or about

June 27, 2019 in New Jersey.

k. Defendant MITRA maintained a personal checking account at Bank 6 ending in 8965. The account was opened on or about July 3, 2019 in New Jersey.

13. It was further part of the conspiracy that during this same time period, defendant MITRA and Arushobike Mitra also received packages from victims containing cash and sent via delivery services Commercial Carrier 1 (“CC1”) and Commercial Carrier 2 (“CC2”).

14. It was further part of the conspiracy that Defendant MITRA and Garbita Mitra received more than approximately \$1,200,000 from victims via mailed packages and/or wire transfers into their bank accounts on or about the dates and in the approximate amounts described below:

<u>VICTIM</u>	<u>DATE</u>	<u>WIRE AMOUNT (W) OR CASH AMOUNT (C)</u>	<u>MONEY MULE</u>	<u>RECEIVING BANK OR COMMERCIAL CARRIER</u>
VICTIM 1	05-06-2019	\$50,000 (W)	Defendant G. MITRA	BANK 1
VICTIM 2	05-28-2019	\$24,700 (W)	Defendant A. MITRA	BANK 2
VICTIM 3	05-28-2019	\$29,600(W)	Defendant G. MITRA	BANK 2
VICTIM 4	05-29-2019	\$44,000 (W)	Defendant A. MITRA	BANK 3
VICTIM 5	05-29-2019	\$10,405.91 (W)	Defendant G. MITRA	BANK 2
VICTIM 6	05-30-2019	\$48,970 (W)	Defendant A. MITRA	BANK 3
VICTIM 7	05-30-2019	\$24,000 (W)	Defendant G. MITRA	BANK 2

VICTIM 8	06-05-2019	\$49,000 (W)	Defendant G. MITRA	BANK 3
VICTIM 9	06-10-2019	\$18,000 (W)	Defendant G. MITRA	BANK 2
VICTIM 10	06-11-2019	\$60,000 (W)	Defendant G. MITRA	BANK 3
VICTIM 11	06-12-2019	\$24,750 (W)	Defendant A. MITRA	BANK 2
VICTIM 12	06-12-2019	\$20,000 (W)	Defendant G. MITRA	BANK 2
VICTIM 13	06-18-2019	\$22,000 (W)	Defendant G. MITRA	BANK 2
VICTIM 14	06-20-2019	\$59,000 (W)	Defendant A. MITRA	BANK 4
VICTIM 14	06-20-2019	\$29,600 (W)	Defendant G. MITRA	BANK 3
VICTIM 15	06-20-2019	\$19,000 (W)	Defendant G. MITRA	BANK 3
VICTIM 14	06-21-2019	\$50,000 (W)	Defendant A. MITRA	BANK 4
VICTIM 16	06-24-2019	\$35,000 (W)	Defendant G. MITRA	BANK 4
VICTIM 17	06-24-2019	\$29,600 (W)	Defendant G. MITRA	BANK 4
VICTIM 18	06-26-2019	\$18,000 (W)	Defendant G. MITRA	BANK 4
VICTIM 19	06-27-2019	\$19,000 (W)	Defendant A. MITRA	BANK 4
VICTIM 20	06-28-2019	\$17,500 (W)	Defendant G. MITRA	BANK 5
VICTIM 21	07-03-2019	\$19,700 (W)	Defendant G. MITRA	BANK 5
VICTIM 22	07-03-2019	\$32,300 (W)	Defendant A. MITRA	**CHECK
VICTIM 22	07-05-2019	\$25,000 (W)	Defendant A. MITRA	BANK 6
VICTIM 23	07-08-2019	\$19,934.90 (W)	Defendant A. MITRA	BANK 6
VICTIM 24	07-08-2019	\$9,500 (W)	Defendant G. MITRA	BANK 4

VICTIM 25	07-15-2019	\$18,500 (W)	Defendant A. MITRA	BANK 6
VICTIM 25	07-16-2019	\$18,100 (W)	Defendant G. MITRA	BANK 4
VICTIM 26	07-18-2019	\$14,000 (W)	Defendant G. MITRA	BANK 4
VICTIM 27	07-22-2019	\$14,000 (W)	Defendant A. MITRA	BANK 7
VICTIM 28	07-22-2019	\$19,900 (W)	Defendant G. MITRA	BANK 6
VICTIM 29	07-23-2019	\$29,900 (W)	Defendant G. MITRA	BANK 4
VICTIM 30	07-25-2019	\$18,730 (W)	Defendant G. MITRA	BANK 4
VICTIM 31	07-28-2019	\$28,000 (W)	Defendant G. MITRA	BANK 3
VICTIM 32	07-29-2019	\$16,800 (W)	Defendant G. MITRA	BANK 6
VICTIM 33	11-05-2019	\$10,000 (C)	Defendant A. MITRA	CC1
VICTIM 34	11-05-2019	\$9,500 (C)	Defendant A. MITRA	CC1
VICTIM 35	11-05-2019	\$10,000 (C)	Defendant A. MITRA	CC1
VICTIM 36	11-05-2019	\$14,000 (C)	Defendant A. MITRA	CC1
VICTIM 37	11-08-2019	\$9,800 (C)	Defendant A. MITRA	CC1
VICTIM 38	11-11-2019	\$14,400 (C)	Defendant A. MITRA	CC1
VICTIM 39	11-15-2019	\$3,600 (C)	Defendant A. MITRA	CC1
VICTIM 40	11-15-2019	\$29,700 (C)	Defendant A. MITRA	CC1
VICTIM 41	11-16-2019	\$11,000 (C)	Defendant A. MITRA	CC1
VICTIM 42	11-16-2019	\$10,000 (C)	Defendant A. MITRA	CC1
VICTIM 43	11-19-2019	\$23,900 (C)	Defendant A. MITRA	CC1

VICTIM 44	11-20-2019	\$9,800 (C)	Defendant A. MITRA	CC1
VICTIM 45	11-20-2019	\$30,000 (C)	Defendant A. MITRA	CC1
VICTIM 46	11-20-2019	\$10,000 (C)	Defendant A. MITRA	CC1
VICTIM 47	11-##-2019	\$10,000 (C)	Defendant A. MITRA	CC2
VICTIM 48	11-##-2019	\$15,000 (C)	Defendant A. MITRA	CC2
	TOTAL	\$1,207,191		

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

FORFEITURE ALLEGATION

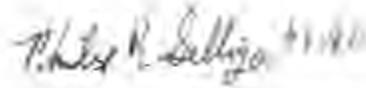
1. As a result of committing the wire fraud conspiracy offense charged in this Information, GARBITA MITRA shall forfeit to the United States, pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), all property, real or personal, constituting or derived from proceeds traceable to the offense charged in this Information.

SUBSTITUTE ASSETS PROVISION

2. If any of the property described above, as a result of any act or omission of defendant GARBITA MITRA:

- 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 intention of United States, pursuant to 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. § 982(b)(1) and 28 U.S.C. § 2461(c), to seek forfeiture of any other property of defendant GARBITA MITRA up to the value of the forfeitable property described in Forfeiture Allegation paragraph 1.



PHILIP R. SELLINGER
United States Attorney

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INFORMATION FOR

18 U.S.C. § 1349

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