

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA	:	Hon.
	:	
	:	Crim. No.
v.	:	18 U.S.C. § 1341
	:	18 U.S.C. § 1028A(a)(1)
	:	18 U.S.C. § 1028(a)(2)
GEORGE WRIGHT	:	18 U.S.C. § 1028(b)(1)(A)(ii)
	:	18 U.S.C. § 2
	:	
	:	<u>I N F O R M A T I O N</u>

COUNT ONE

(Mail Fraud)

(18 U.S.C. § 1341)

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:

a. Defendant GEORGE WRIGHT was a resident of Newark, New Jersey and engaged in a fraudulent payroll scheme. Defendant GEORGE WRIGHT participated in all aspects of the scheme, including but not limited to, creating fraudulent payroll accounts for certain businesses, recruiting individuals to act as fictitious employees of the businesses, transporting the individuals posing as employees to cash the fraudulent payroll checks (often at check cashing premises), and receiving a portion of the proceeds from the cashed fraudulent payroll checks.

b. "The Payroll Company" was an international provider of integrated computing and business outsourcing services, including payroll management services, with offices located in Essex County, New Jersey and Morris County, New Jersey.

c. The Payroll Company managed payroll for small and large businesses. Through its payroll management services, the Payroll Company issued payroll checks to business employees. In issuing payroll checks, the Payroll Company either mailed hard copy payroll checks or deposited payroll checks directly into employee bank accounts.

d. Through the Payroll Company's payroll services, business owners created payroll accounts by providing information, including the name and location of the business, the names and addresses of employees to be paid, and the bank account information for the account from which the payroll checks were to be drawn.

e. "The Mail Carrier" was a private and commercial interstate carrier of mail matter.

f. "Company 1," "Company 2," and "Company 3" were legitimate corporate names used by defendant GEORGE WRIGHT to create fictitious business payroll accounts. Defendant GEORGE WRIGHT provided the Payroll Company with bank routing and account numbers from which the payroll checks for the purported employees of Company 1, Company 2, and Company 3 were to be issued.

THE SCHEME TO DEFRAUD

2. From in or around November 2010 through in or around March 2011, in Essex County, in the District of New Jersey and elsewhere, defendant

GEORGE WRIGHT

did knowingly and intentionally devise a scheme and artifice to defraud the Payroll Company and several check cashing companies, and to obtain money from the Payroll Company and several check cashing companies by means of materially false and fraudulent pretenses, representations, and promises, as set forth below.

OBJECT OF THE SCHEME AND ARTIFICE TO DEFRAUD

3. It was the object of the scheme and artifice to defraud for defendant GEORGE WRIGHT to enrich himself by obtaining money from the Payroll Company and several check cashing companies by creating several fraudulent business payroll accounts and causing the Payroll Company to issue payroll checks to purported employees of these businesses, which were typically cashed at check cashing premises by individuals recruited by defendant GEORGE WRIGHT.

MANNER AND MEANS OF THE SCHEME AND ARTIFICE TO DEFRAUD

4. It was part of the scheme and artifice to defraud that from in or about January 2010 through in or about March 2011, defendant GEORGE WRIGHT paid a co-conspirator for patient records stolen from a New Jersey hospital. The stolen patient records contained personally identifiable information, including patients' names, dates of birth, social security numbers,

and Medicare and Medicaid insurance information.

5. It was further part of the scheme and artifice to defraud that beginning in or around November 2010 through in or around March 2011, defendant GEORGE WRIGHT contacted the Payroll Company to create several fraudulent business payroll accounts for Company 1, Company 2, and Company 3, which he falsely purported to represent.

6. It was further part of the scheme and artifice to defraud that defendant GEORGE WRIGHT provided the Payroll Company with bank routing and account numbers from which the payroll checks for the companies were to be issued; the bank routing and account numbers did not correspond to accounts held by Company 1, Company 2, and Company 3.

7. It was further part of the scheme and artifice to defraud that using the stolen patient records referred to above, defendant GEORGE WRIGHT took the names belonging to actual persons and represented to the Payroll Company that payroll checks should be issued in those individuals' names and sent to addresses that, in fact, were controlled by defendant GEORGE WRIGHT and his co-conspirators.

8. It was further part of the scheme and artifice to defraud that in or around January 2011, defendant GEORGE WRIGHT caused the Payroll Company to issue payroll checks to purported employees of Company 1 using the bank account information provided by defendant GEORGE WRIGHT. Those payroll checks were sent from the Payroll Company's offices in Morris County, New Jersey in or about January, 2011 using the Mail Carrier, a private and

commercial interstate carrier, to an address in New Jersey controlled by defendant GEORGE WRIGHT.

9. It was further part of the scheme and artifice to defraud that in or around February 2011, defendant GEORGE WRIGHT caused the Payroll Company to issue payroll checks to purported employees of Company 2 using the bank account information provided by defendant GEORGE WRIGHT. Those payroll checks were sent from the Payroll Company's offices in Morris County, New Jersey using the Mail Carrier to an address in New Jersey controlled by defendant GEORGE WRIGHT.

10. It was further part of the scheme and artifice to defraud that in or around March 2011, defendant GEORGE WRIGHT caused the Payroll Company to issue payroll checks to purported employees of Company 3 using the bank account information provided by defendant GEORGE WRIGHT. Those payroll checks were sent from the Payroll Company's offices in Morris County, New Jersey using the Mail Carrier to an address in New Jersey controlled by defendant GEORGE WRIGHT.

11. It was further part of the scheme and artifice to defraud that following delivery of the aforementioned payroll checks, defendant GEORGE WRIGHT transported individuals whom he recruited to pose as the employees of Company 1, Company 2, and Company 3 and to whom the payroll checks were made payable, to various locations, typically check cashing premises, in New Jersey and New York, to cash the checks. Defendant GEORGE WRIGHT then kept the majority of the proceeds for his own use.

12. As a result of the scheme and artifice to defraud, defendant GEORGE WRIGHT fraudulently obtained approximately \$148,852.01 from various companies, including but not limited to the Payroll Company and several check cashing companies, which ultimately paid out the checks and sustained a loss.

13. On or about January 14, 2011, in Essex County, in the District of New Jersey and elsewhere, defendant

GEORGE WRIGHT

knowingly caused to be delivered by mail, through a private and commercial interstate carrier, certain mail matter from the Payroll Company's offices in Morris County, New Jersey to defendant GEORGE WRIGHT in New Jersey, namely, a payroll check made payable to a purported employee of Company 1 in the approximate amount of \$1,024.58.

All in violation of Title 18, United States Code, Section 1341, and Title 18, United States Code, Section 2.

COUNT TWO
(Aggravated Identity Theft)
(18 U.S.C. § 1028A(a)(1))

1. The allegations set forth in paragraphs 1 and 3-12 of Count One of this Information are re-alleged and incorporated as if set forth herein.

2. In or around January 2011, in Essex County, in the District of New Jersey and elsewhere, defendant

GEORGE WRIGHT

did knowingly transfer, possess, and use, without lawful authority, a means of identification of another person, namely, a name, date of birth, and social security number of Victim #1, during and in relation to a felony violation of a provision contained in Chapter 63 of the United States Code, that is, mail fraud, as charged in Count One of this Information.

In violation of Title 18, United States Code, Section 1028A(a)(1), and Title 18, United States Code, Section 2.

COUNT THREE

(Transfer of Fraudulent Documents)

(18 U.S.C. § 1028(a)(2))

From in or around August 2013 through in or around September 2013, in Essex County, in the District of New Jersey and elsewhere, defendant

GEORGE WRIGHT

did knowingly transfer identification documents, to wit, birth certificates, knowing that such documents were stolen and produced without lawful authority.

In violation of Title 18, United States Code, Sections 1028(a)(2) and 1028(b)(1)(A)(ii), and Title 18, United States Code, Section 2.

FORFEITURE ALLEGATION

1. The allegations contained in Counts One through Three of this Information are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

2. Upon conviction of the offense in violation of Title 18, United States Code, Section 1341 set forth in Count One of this Information, the defendant, GEORGE WRIGHT, shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the offense. The property to be forfeited includes, but is not limited to, a sum of money equal to at least \$148,852.01.

3. If by any act or omission of defendant GEORGE WRIGHT, any of the property subject to forfeiture described in paragraph 2 herein:

- 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,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

All pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c).



PAUL J. FISHMAN
United States Attorney

CASE NUMBER: _____

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UNITED STATES OF AMERICA

v.

GEORGE WRIGHT

INFORMATION FOR

18 U.S.C. § 1341
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18 U.S.C. § 1028(a)(2)
18 U.S.C. § 1028(b)(1)(A)(ii) and 18 U.S.C. § 2

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