

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Criminal No. 23-
v. :
VICTORIA CROSBY : 18 U.S.C. §§ 1343 and 2

INFORMATION

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 VICTORIA CROSBY was a resident of Atlantic City, New Jersey.

The Scheme to Defraud

2. From at least as early as January 2020 through in or about January 2021, in Atlantic County, in the District of New Jersey and elsewhere, defendant

VICTORIA CROSBY

did knowingly and intentionally devise a scheme and artifice to defraud mainly elderly victims whose spouses recently passed away and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, which scheme and artifice was in substance as set forth below.

3. It was part of the scheme and artifice that defendant VICTORIA CROSBY used a prepaid cellular phone to contact and communicate with

Victims, who were often elderly and whose spouses or family members recently had died.

4. It was further part of the scheme and artifice that, during her phone communications with the Victims, defendant VICTORIA CROSBY introduced herself using fictitious names and represented that she was an employee of either a retirement benefit office and/or a life insurance company.

5. It was further part of the scheme and artifice that defendant VICTORIA CROSBY falsely told Victims that their deceased family members had either pensions or life insurance policies, of which the Victims were the beneficiaries, and that the pensions or policies were in arrears, and that in order to correct the underpayments and receive the benefits of the pensions or policies, the Victims needed to pay the arrearages.

6. It was further part of the scheme and artifice that defendant VICTORIA CROSBY instructed the Victims on how to make payments to ensure that the pension or life insurance policy was paid in full. Specifically, defendant CROSBY instructed Victims to purchase reloadable prepaid cards at various retailers and provide defendant CROSBY with the 10-digit code numbers on the back of the cards.

7. It was further part of the scheme and artifice that after obtaining the Victims' code number information for the reloadable prepaid cards, defendant VICTORIA CROSBY loaded the money from the cards into accounts that defendant CROSBY controlled on the cards' websites.

8. It was part of further part of the scheme and artifice that

defendant VICTORIA CROSBY withdrew the Victims' funds from various ATMs in and around Atlantic County, New Jersey.

9. It was further part of the scheme and artifice that defendant VICTORIA CROSBY caused at least 17 Victims of the fraudulent scheme to provide her with over \$100,000.

10. It was further part of the scheme and artifice that on or about November 12, 2020, defendant VICTORIA CROSBY called VICTIM 2 (age 73). Defendant CROSBY falsely told VICTIM 2 that defendant CROSBY was from the Maryland State Retirement Agency ("MSRA") and was calling regarding a life insurance policy that had been obtained by VICTIM 2's deceased husband, for which VICTIM 2 was the beneficiary. Defendant CROSBY told VICTIM 2 that VICTIM 2's deceased husband, a Maryland state employee who had passed away approximately two weeks earlier, was in arrears on a life insurance policy and that in order to receive the insurance payout, VICTIM 2 needed to pay the amount in arrears. Defendant CROSBY initially told Victim 2 that the arrearage was \$3,498. Defendant CROSBY instructed VICTIM 2 to purchase reloaded cards, scratch off the back of the cards, provide defendant CROSBY with the 10-digit code number on the back of the cards, and then mail the cards to addresses located in in Portland, Oregon, and Seattle, Washington.

11. It was further part of the scheme and artifice that on or about November 13, 2020, defendant VICTORIA CROSBY called VICTIM 2, falsely identified herself as the supervisor of the person from MSRA who previously had called VICTIM 2, and told VICTIM 2 that the caller from the previous

evening had made a mistake in the amount that VICTIM 2 needed to pay to satisfy the arrears on VICTIM 2's husband's insurance policy, which would enable VICTIM 2 to receive the money that purportedly was due to VICTIM 2 as a beneficiary of the policy.

12. It was further part of the scheme and artifice that, during that phone conversation on or about November 13, 2020, defendant VICTORIA CROSBY again instructed VICTIM 2 to purchase reloadable cards and provide defendant CROSBY with the code number information for the cards. Thereafter, on or about November 13, 2020 and November 14, 2020, VICTIM 2 purchased approximately \$6,496 in additional reloadable credit cards from several Safeway stores in Maryland and provided the 10-digit identifying code numbers on the back of each reloadable cards to defendant CROSBY over the phone.

13. It was further part of the scheme and artifice that defendant VICTORIA CROSBY withdrew VICTIM 2's money at ATMs in Brigantine, Atlantic City and Absecon, New Jersey, and used that money for defendant CROSBY's own purposes.

The Charge

14. On or about November 12, 2020, in Atlantic County, in the District of New Jersey and elsewhere, having devised and intending to devise a scheme and artifice to defraud and for obtaining money and property by means of materially false and fraudulent pretenses, representations, and promises, defendant

VICTORIA CROSBY

for the purpose of executing such scheme and artifice, did knowingly and with fraudulent intent transmit and cause to be transmitted by means of wire communications in interstate commerce, various writings, signs, signals, pictures, and sounds, namely cellphone calls to VICTIM 2 regarding VICTIM 2's husband's alleged insurance policy benefits.

In violation of Title 18, United States Code, Section 1343, and Title 18, United States Code, Section 2.



PHILIP R. SELLINGER
United States Attorney

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INFORMATION FOR
18 U.S.C. § 1343
18 U.S.C. § 2

PHILIP R. SELLINGER
U.S. ATTORNEY, NEWARK, NEW JERSEY

JASON M. RICHARDSON
ASSISTANT U.S. ATTORNEY
CAMDEN, NEW JERSEY
(856) 757-5026

USA-48AD8
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