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UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

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UNITED STATES OF AMERICA :  
 : Hon. Michael A. Hammer  
 :  
 v. : Mag. No. 25-10026  
 :  
 ANTONIO PETROSINO : CRIMINAL COMPLAINT  
 a/k/a ANTHONY PETROSINO :  
 : **FILED UNDER SEAL**

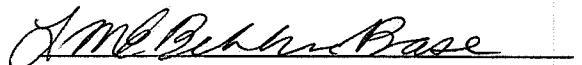
I, Laura Behlmann-Brase, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

**SEE ATTACHMENT A**

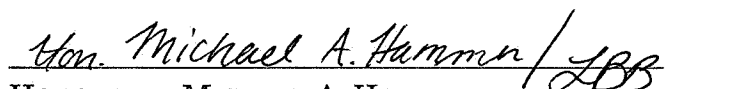
I further state that I am a Special Agent with the Federal Bureau of Investigation, and that this complaint is based on the following facts:

**SEE ATTACHMENT B**

continued on the attached pages and made a part hereof.

  
\_\_\_\_\_  
Laura Behlmann-Brase, Special Agent  
Federal Bureau of Investigation

Special Agent Behlmann-Brase attested to this  
Complaint by telephone pursuant to F.R.C.P. 4.1(b)(2)(A)  
on this 23rd day of January, 2025

  
\_\_\_\_\_  
HONORABLE MICHAEL A. HAMMER  
UNITED STATES MAGISTRATE JUDGE

5:17pm

**ATTACHMENT A**

**COUNT ONE**  
**(Wire Fraud)**

From in or around March 2018 through in or around March 2024, in the District of New Jersey and elsewhere, the defendant,

**ANTONIO PETROSINO,**  
**a/k/a ANTHONY PETROSINO,**

knowingly and intentionally devised and intended to devise a scheme and artifice to defraud and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, and, for the purpose of executing and attempting to execute such scheme and artifice, did knowingly transmit and cause to be transmitted by means of wire, radio, and television communication in interstate and foreign commerce, the following writings, signs, signals, pictures, and sounds.

<b>Approximate Date</b>	<b>Description</b>
June 19, 2020	PETROSINO deposited a check for approximately \$100,000 drawn from the Victim Investor's Bank 2 personal bank account into PETROSINO's personal money market account at a Bank 1 branch location in Hoboken, New Jersey, resulting in an interstate wire transmission.

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

**COUNT TWO**  
**(Engaging in Monetary Transactions in Property Derived from Specified  
Unlawful Activity)**

On or about May 4, 2020, in the District of New Jersey and elsewhere, the defendant,

**ANTONIO PETROSINO,  
a/k/a ANTHONY PETROSINO,**

did knowingly engage and attempt to engage, and cause and aid and abet others in engaging, in a monetary transaction by, through, and to a financial institution, affecting interstate and foreign commerce, in criminally derived property that was of a value greater than \$10,000, that is, a wire transfer of \$13,000 from a Bank 1 account in PETROSINO's name ending in x6744 to another Bank 1 account in PETROSINO's name ending in x1470, such property having been derived from specified unlawful activity, that is, wire fraud, in violation of Title 18, United States Code, Section 1343.

In violation of Title 18, United States Code, Sections 1957 and 2.

## ATTACHMENT B

I, Laura Behlmann-Brase, am a Special Agent with the Federal Bureau of Investigation. I have conducted an investigation and discussed this matter with other law enforcement officers who have participated in this investigation and have knowledge of the following facts. Because this affidavit is being submitted for the limited purpose of establishing probable cause, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause. All dates and dollar amounts described in this affidavit are approximate and all conversations and statements described in this affidavit are related in substance and in part.

### Overview

1. Between in or around March 2018 and in or around March 2024, defendant ANTONIO PETROSINO, a/k/a ANTHONY PETROSINO ("PETROSINO"), fraudulently induced an elderly victim investor (the "Victim Investor") to transfer the majority of her funds to PETROSINO based on PETROSINO's misrepresentations that he would invest, on behalf of the Victim Investor, the Victim Investor's funds in brokerage accounts and other investment products. In reality, PETROSINO failed to invest the Victim Investor's funds for her benefit as promised, and instead misappropriated the funds for his own personal gain, causing the Victim Investor more than approximately \$888,000 in losses.

### Background

2. At various times relevant to this Complaint:

a. PETROSINO resided in or around Hoboken, New Jersey. PETROSINO formerly worked at a financial planning and wealth management services company with headquarters in Paramus, New Jersey (the "Wealth Management Company") as a field representative from in or around 2012 through in or around 2017, and later had a broker relationship with the Wealth Management Company.

b. The Victim Investor was an elderly individual residing in Wyckoff, New Jersey. In addition to investing her money with PETROSINO, the Victim Investor also relied on PETROSINO to prepare her tax returns.

c. "Bank 1" was an American national bank, and subsidiary of a multinational financial services firm, with headquarters in Cherry Hill, New Jersey.

d. "Bank 2" was a financial services firm with headquarters in Guttenberg, New Jersey.

e. “Bank 3” was a financial services firm with headquarters in New York, New York.

f. “Bank 4” was a bank holding company with headquarters in Tysons, Virginia.

g. “Online Bank” was the online consumer banking division of an investment bank that offered online savings accounts and other investment products.

### The Scheme to Defraud

3. In or around 2014, the Victim Investor was first introduced by a relative to PETROSINO, who was working as a field representative for the Wealth Management Company, as someone who could assist the Victim Investor with investing the proceeds of her then-recent sale of her home in North Bergen, New Jersey. PETROSINO held himself out to the Victim Investor as a financial services professional who would provide her with investment advisory services.

4. In or around March 2015, the Victim Investor gave PETROSINO an approximately \$200,000 check drawn on a Bank 2 personal bank account in the name of the Victim Investor and one of her relatives (the “Bank 2 Account”) to fund an annuity that was purchased through the Wealth Management Company and funded on or about March 19, 2015 (the “Annuity”).

5. Subsequently, the Victim Investor developed a relationship of trust with PETROSINO, who would take her on gambling trips to casinos, help her with home repairs, and assist with her taxes.

6. Following the purchase of the Annuity, PETROSINO recommended that the Victim Investor give him additional amounts and misrepresented that he would invest the funds on her behalf, including in Certificates of Deposit (“CDs”) and brokerage accounts. The Victim Investor began transferring additional funds to PETROSINO in or around March 2018 with the understanding and intent that PETROSINO would invest those funds for her benefit based on his representations to her.

7. In approximately February 2019, the Victim Investor sold her home in Fairview, New Jersey, and PETROSINO recommended that she invest the proceeds of that sale through PETROSINO. The Victim Investor transferred approximately \$50,000 of the proceeds to PETROSINO on or about February 28, 2019, and continued to send additional proceeds from the sale totaling at least approximately \$582,000.00 to PETROSINO to invest for her benefit.

8. In total, PETROSINO induced the Victim Investor to transfer approximately \$916,000 to him based on PETROSINO's misrepresentations that he would invest those funds for the benefit of the Victim Investor.

9. At various times throughout the conspiracy, the Victim Investor asked PETROSINO to provide her with account statements for her investment accounts. In response, PETROSINO told the Victim Investor that the investment banks wanted to conduct all business electronically and would charge the Victim Investor approximately \$20 for every statement.

10. PETROSINO occasionally provided the Victim Investor with falsified account statements that purported to show the location and amounts of the Victim Investor's investments, but were not, in fact, generated by or in the standard format of the Wealth Management Company (the "Falsified Account Statements"). For example, PETROSINO provided the Victim Investor with a document that purported to show the amounts and maturity dates of the Annuity and the Victim Investor's various "Investment Accounts (Rollover Interest)," "Rollover Accounts (Rollover Interest)," and "Yearly Interest Accounts (Online)," with a purported "Total Investmens" [sic] amount of \$632,000. Wealth Management Company personnel confirmed the Falsified Account Statements were forged.

11. To further perpetuate the scheme, PETROSINO visited the Victim Investor at her home each spring to give her cash payments in the approximate range of \$4000-\$8000, which PETROSINO claimed was the interest that the Victim Investor had earned in her brokerage accounts. Over the course of the fraudulent scheme, PETROSINO transferred a total of approximately \$100,000 to the Victim Investor, including amounts he characterized as her investment earnings.

12. In reality, PETROSINO did not invest the Victim Investor's funds for her benefit as promised. Instead, PETROSINO diverted the funds to pay for his personal expenses, including rent payments on a luxury apartment, credit card payments, and gambling expenses.

13. Even when PETROSINO deposited the Victim Investor's funds into investment accounts or products, PETROSINO ultimately misappropriated those funds after he liquidated the investment accounts. For example:

- a. after the Annuity was liquidated on or about April 12, 2020, approximately \$162,000 in proceeds was transferred to the Victim Investor's Bank 2 Account. PETROSINO then caused approximately \$152,000 to be transferred from the Bank 2 Account to PETROSINO's personal bank accounts between in or around April 2020 and in or around June 2020 for PETROSINO's personal use.

- b. in or around November 2020, PETROSINO opened two certificate of deposit ("CD") accounts with the Online Bank in the Victim Investor's name and funded each account with approximately \$50,000 of the Victim Investor's money. These CD accounts were liquidated in June 2021 and July 2021, respectively, and PETROSINO then transferred the proceeds to himself via check and spent them on his living expenses.

14. The Victim Investor neither accessed her accounts with Online Bank via the internet nor received correspondence directly from the Online Bank. The investigation shows that the Victim Investor's Online Bank customer profile information lists PETROSINO's email account and phone number as the contact information for the Victim Investor. Additionally, while the Victim Investor's customer profile lists her correct home address, PETROSINO ensured that no written correspondence would be sent to the Victim Investor's home address by setting the communication preferences to "opt out" of direct mail communications. Instead, PETROSINO set the communication preferences to "opt in" to email and SMS communications, for which PETROSINO's, and not the Victim Investor's, contact information was provided.

15. PETROSINO caused additional funds to be transferred electronically from the Victim Investor's accounts for PETROSINO's benefit without the Victim Investor's knowledge or consent, including approximately \$21,825 that was transferred from the Victim Investor's Bank 3 account to PETROSINO's Bank 3 account, and approximately \$10,670 that was transferred from the Victim Investor's Bank 4 account to PETROSINO's landlord to pay PETROSINO's rent.

16. PETROSINO also told the Victim Investor he would assist her with preparing her tax returns, and caused the Victim Investor to send PETROSINO a total of approximately \$40,000 that he claimed the Victim Investor owed in taxes, including taxes that were purportedly owed following the 2019 sale of her home. PETROSINO then misappropriated these intended tax payments by the Victim Investor for his personal benefit.

17. In or around March 2024, the Victim Investor learned that PETROSINO had not invested her money as promised, after she received notice from Bank 4 that a personal check made out to a charity failed to process due to insufficient funds. One of the Victim Investor's relatives then sent a text message to PETROSINO, who responded that the notice of the bounced check was a scam and should be ignored. Upon further inquiry, the Victim Investor learned that her Bank 4 account contained less than \$100—substantially less than she expected—as a result of PETROSINO's unauthorized misappropriation of her funds.

18. After the Victim Investor and her relative confronted PETROSINO and asked where the Victim Investor's money was, PETROSINO provided false assurances that the Victim Investor's funds were held in brokerage accounts, and later claimed that they were invested in hedge funds, insurance companies and real estate companies. PETROSINO further stated that the Victim Investor's funds could not be withdrawn early without incurring monetary penalties.

19. Despite repeated promises to provide the Victim Investor with her investment funds, PETROSINO's last payment to the Victim Investor was in the amount of \$2500 in or around May 2024.

20. In total, PETROSINO's fraud resulted in approximately \$888,000 in losses to the Victim Investor.