

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

UNITED STATES OF AMERICA	:	Hon.
	:	
v.	:	Crim. No. 25-
	:	
CHARLES A. GALLO	:	18 U.S.C. § 1343

**I N F O R M A T I O N**

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

**Individuals and Entities**

1. At all times relevant to this Information:
  - a. Defendant Charles A. Gallo (“GALLO”) resided in Hawthorne, New Jersey and was an employee of a public library located in Bergen County, New Jersey (the “Library”).
  - b. Victim-1 and Victim-2 (collectively, the “Victims”) were married and resided in Bergen County, New Jersey. GALLO worked for the Victims as a part-time personal assistant.
  - c. Company-1 was a web-based financial services platform headquartered in San Jose, California that maintained all of its servers outside of the District of New Jersey. Company-1 facilitated payment for goods and services via online money transfer and allowed customers to link credit cards to registered Company-1 accounts.

### **The Scheme to Defraud**

2. From in or around March 2022 through in or around March 2023, in Bergen County, in the District of New Jersey and elsewhere, the defendant,

**CHARLES A. GALLO,**

did knowingly and intentionally devise and intend to devise a scheme and artifice to defraud, and to deprive the Victims of money and property by means of materially false and fraudulent pretenses, representations, and promises, as set forth below.

### **Goal of the Scheme to Defraud**

2. The goal of the scheme was for GALLO to enrich himself by using his position as the Victims' part-time assistant to fraudulently misappropriate funds from the Victims' personal accounts for his personal gain.

### **Manner and Means of the Scheme to Defraud**

3. It was part of the scheme and artifice to defraud that:

a. GALLO maintained employment as the Victims' part-time personal assistant and used his position to misappropriate and divert funds from the Victims' bank accounts, which he controlled.

b. In particular, in or around 2018, the Victims hired GALLO to work as a part-time personal assistant at their residence.

c. GALLO's duties included, among other things, managing the Victims' monthly bills and banking and assisting them with email and other computer and technology-related issues. To facilitate his work, the Victims gave GALLO access to their personal bank accounts, credit card accounts, email,

Company-1 account, and other online retail accounts.

d. GALLO routinely, and without authorization, accessed the Victim's various accounts for his personal use, including by: using the Victims' ATM card to withdraw large amounts of cash, opening a line of credit, cashing checks he made payable to himself drawn on the Victims' bank accounts, and using the Victims' credit cards to purchase computer equipment, gaming systems, collectible items from online retailers, and other unauthorized transactions, all for his personal use.

e. After making these unauthorized purchases, GALLO typically shipped the items in his own name via the United States mail or a commercial carrier to his home address in Hawthorne, New Jersey (the "GALLO Residence") or to the Library. GALLO also shipped items to addresses in Bergen County, Passaic County, and elsewhere.

f. Proof of these shipments was often sent to Victim-1's email account, which GALLO controlled.

g. Between in and around October 2022 and in and around March 2023, GALLO used the Victims' Company-1 account, which was linked to several of their credit cards, for over \$2 million in unauthorized transactions.

h. For example, GALLO used the Victims' Company-1 account, linked to several of the Victims' credit cards, to cause the following unauthorized transactions:

<b>Approximate Date(s)</b>	<b>Approximate Total of Unauthorized Transaction</b>
November 2, 2022 – November 6, 2022	\$56,062
November 12, 2022	\$24,525
December 14, 2022 – December 23, 2022	\$26,908
February 11, 2023 – February 14, 2023	\$33,722

i. To perpetuate the fraudulent scheme, GALLO siphoned funds from the Victims' bank accounts to pay down the Victims' credit card balances each month.

j. In total, GALLO's conduct resulted in a loss of at least approximately \$3,255,744 to the Victims.

#### **Execution of the Scheme**

4. For the purpose of executing the scheme and artifice to defraud, in Bergen County, in the District of New Jersey and elsewhere, the defendant,

**CHARLES A. GALLO,**

did knowingly transmit and cause to be transmitted by means of wire, radio, and television communication in interstate and foreign commerce, certain writing, signs, signals, pictures, and sounds, as set forth in the chart below:

<b>Approximate Date of Wire</b>	<b>Description</b>
November 12, 2022	GALLO used the Victims' Company-1 account to make approximately \$24,525 in unauthorized purchases, causing interstate wires that traveled through New Jersey.

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

### **FORFEITURE ALLEGATION**

Upon conviction of the offense charged in this Information, defendant CHARLES A. GALLO shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461, any property, real or personal, which constitutes or is derived from proceeds traceable to the commission of such offense.

### **Substitute Assets Provision**

If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third person;
- (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 subdivided without difficulty,

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.



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ALINA HABBA  
United States Attorney