

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

UNITED STATES OF AMERICA	:	Hon.
	:	
v.	:	Crim. No. 26-
	:	
EDWARD LOW,	:	18 U.S.C. § 1349
a/k/a “Mang Wah Low,”	:	18 U.S.C. § 1005
a/k/a “Eddie Low”	:	

I N F O R M A T I O N

The defendant having waived in open court prosecution by Indictment, and any challenges based on venue, the United States charges:

COUNT ONE

(Conspiracy to Commit Wire Fraud Affecting a Financial Institution)

Background

1. Unless otherwise indicated, at all times relevant to Count One:
 - a. Defendant Edward Low, a/k/a “Mang Wah Low,” a/k/a “Eddie Low” (“LOW”) lived in Flushing, Queens County, New York.
 - b. TD Bank, N.A. (“TD Bank”) was a financial institution as defined in Title 18, United States Code, Section 20, whose deposits were insured by the Federal Deposit Insurance Corporation.
 - c. LOW was a Customer Service Representative at a TD Bank branch in Flushing, New York.

The Conspiracy

2. From in or around January 2021 through in or around May 2021, the defendant,

**EDWARD LOW,
a/k/a “Mang Wah Low,”
a/k/a “Eddie Low,”**

did knowingly and intentionally conspire and agree with others to devise a scheme and artifice to defraud, which would affect a financial institution, namely TD Bank, and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, and for the purpose of executing such scheme and artifice to defraud, transmitted and caused to be transmitted by means of wire communications in interstate and foreign commerce certain writings, signs, signals, pictures, and sounds, contrary to Title 18, United States Code, Section 1343.

Goal of the Conspiracy

3. The goal of the conspiracy was for defendant LOW and his co-conspirators to unlawfully enrich themselves by fraudulently gaining access to and stealing money from customers’ accounts at TD Bank.

Manner and Means of the Conspiracy

4. It was part of the conspiracy that:
- a. In exchange for bribes totaling approximately \$26,700, LOW used his TD Bank employee credentials to access and share with his co-conspirators confidential bank account information for dozens of TD Bank customers, including Individual-1.
 - b. LOW conducted unauthorized wires from numerous TD Bank customer accounts, including Individual-1.

c. For example, on or about May 28, 2021, LOW conducted an unauthorized outbound wire for approximately \$484,572.16 from Individual-1's account to an account owned or controlled by LOW's co-conspirators, for a co-conspirator that LOW knew was not Individual-1. TD Bank incurred the loss by later reimbursing Individual-1's account.

In violation of Title 18, United States Code, Section 1349.

COUNT TWO
(Making False Bank Entries)

1. The allegation in paragraph 1(a) of this Information is realleged here.
2. Unless otherwise indicated, at all times relevant to Count Two:
 - a. Financial Institution-1 was a financial institution as defined in Title 18, United States Code, Section 20, whose deposits were insured by the Federal Deposit Insurance Corporation.
 - b. LOW was an employee in the Sales and Services Department at a Financial Institution-1 branch in New York, New York.
3. In or around May 2022, in exchange for a bribe of approximately \$1,000, LOW opened a business bank account (“Bank Account-1”) at Financial Institution-1 at the direction of co-conspirator Cheungkin Lam, a/k/a “Kelvin” (“Lam”), even though LOW knew both: (1) that Individual-2, who was not present at the account opening, was falsely identified as the accountholder and authorized signer; and (2) that the business in whose name the account was opened, Late Night Bistro Inc, was not engaged in legitimate business.
4. Bank Account-1 was subsequently used by co-conspirators to receive and launder proceeds from various fraud schemes, which resulted in losses of at least approximately \$47,195 for Victim-1.
5. From in or around May 2022 through in or around August 2022, the defendant,

**EDWARD LOW,
a/k/a “Mang Wah Low,”
a/k/a “Eddie Low,”**

with intent to injure and defraud a national bank, namely Financial Institution-1, and to deceive officers of Financial Institution-1, made false entries in books, reports, and statements of such national bank.

In violation of Title 18, United States Code, Section 1005.

FORFEITURE ALLEGATION

Upon conviction of conspiracy to commit wire fraud affecting a financial institution, in violation of 18 U.S.C. § 1349, as charged in Count One of this Information, or upon conviction of making false bank entries, in violation of 18 U.S.C. § 1005, as charged in Count Two of this Information, the defendant,

**EDWARD LOW,
a/k/a “Mang Wah Low,”
a/k/a “Eddie Low,”**

shall forfeit to the United States, pursuant to 18 U.S.C. § 982(a)(2), any property constituting, or derived from, proceeds the defendant obtained directly or indirectly as the result of such violation.

SUBSTITUTE ASSETS PROVISION

If any of the property described above, 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 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,

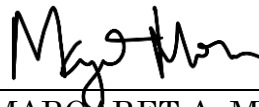
the United States shall be entitled, pursuant to 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. § 982(b), to forfeiture of any other property of the defendant up to the value of the forfeitable property described above.

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Approved:

/s/ R. David Walk, Jr.
R. David Walk, Jr.
Deputy U.S. Attorney