UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA	:	Hon.
	:	
v.	:	Crim. No.
	:	
JANE CROSBY	:	18 U.S.C. § 1344
	:	18 U.S.C. § 1028A(a)(1)

INFORMATION

The defendant having waived in open court prosecution by Indictment, the United States charges:

COUNT ONE
(Bank Fraud)

Background

1. At all times relevant to this Information:

   a. Defendant JANE CROSBY ("CROSBY") was a Sergeant First Class in the U.S. Army and U.S. Army Recruiter. CROSBY was assigned to a U.S. Army recruiting station in East Orange, New Jersey (the "Recruiting Station").

   b. "Credit Union-1" was a credit union with accounts insured by the National Credit Union Share Insurance Fund, with branches across the United States and worldwide, including in New Jersey.

   c. "Victim-1" was an individual who visited the Recruiting Station in or around March or April 2023 and was recruited by CROSBY.

Victim-1 thereafter enlisted in the U.S. Army and was stationed in Texas in or around September 2023.

d. "Victim-2" was a U.S. Army applicant from in or around August 2023 through in or around December 2023, who spoke to recruiters at the Recruiting Station, but did not ultimately join the military.

e. "Victim-3" was an individual who unsuccessfully attempted to enlist the U.S. Army through the Recruiting Station.

f. "Victim-4" was a U.S. Army applicant who unsuccessfully attempted to enlist in the U.S. Army through the Recruiting Station in or around 2022 and again in or around 2023.

g. "Victim-5" was a civilian who did not attempt to enlist in the U.S. Army through the Recruiting Center.

h. "Victim-6" was a U.S. Army applicant who visited the Recruiting Station but did not ultimately enlist.

i. "Victim-7" was a civilian who did not attempt to enlist in the U.S. Army through the Recruiting Center (collectively, with Victims 1 through 6, the "Victims").

The Scheme to Defraud

2. From at least as early as in or around September 2023 through in or around December 2023, in Essex County, in the District of New Jersey and elsewhere, the defendant,

JANE CROSBY,

did knowingly and intentionally execute and attempt to execute a scheme and artifice to defraud a financial institution, namely, Credit Union-1, and to obtain any of the moneys, funds, credits, assets, securities, and other property owned by, and under the custody and control of, this financial institution, by means of materially false and fraudulent pretenses, representations, and promises.

Overview of the Scheme to Defraud

3. Between in and around September 2023 and in or around December 2023, CROSBY engaged in a scheme to defraud Credit Union-1. Namely, CROSBY used her position as a U.S. Army Recruiter to obtain personal identifying information ("PII") belonging to the Victims and submitted fraudulent account applications to Credit Union-1 without the Victims' knowledge. Once the accounts were opened, CROSBY applied for loans and credit card accounts and used the accounts to deposit fraudulent checks and withdraw funds.

Goal of the Scheme to Defraud

4. The goal of the scheme to defraud was for CROSBY to obtain access to Credit Union-1 accounts so that CROSBY could use these accounts to open loans, access credit card accounts, and deposit fraudulent checks.

Manner and Means of the Scheme to Defraud

5. It was part of the scheme to defraud that CROSBY submitted "Pre-Active Duty Membership" applications in the Victims' names and using their PII to Credit Union-1, without the Victims' authorization.

6. It was further part of the scheme that once these accounts were open at Credit Union-1, CROSBY applied for loans and credit cards using the Victims' PII, also without the Victims' authorization.

7. It was further part of the scheme that CROSBY used the Credit Union-1 accounts to deposit fraudulent checks. Once the checks were deposited, the funds were debited from the Credit Union-1 accounts using money orders, ATM withdrawals, and other expenditures.

8. It was further part of the scheme that numerous calls were made to Credit Union-1's call center, including from CROSBY's office telephone number and a phone number registered to the Recruiting Station's IP address, in which the caller impersonated Victim-1 and Victim-4, in an attempt to access their Credit Union-1 accounts.

Execution of the Scheme

9. Between in or around September 2023 and in or around December 2023, in the District of New Jersey and elsewhere, for the purpose of executing and attempting to execute the scheme and artifice to defraud a financial institution, the defendant,

JANE CROSBY,

did knowingly and intentionally execute and attempt to execute a scheme and artifice to defraud a financial institution, namely Credit Union-1, and to obtain money, funds, credits, assets, securities, and other property owned by, and under the custody and control of, that financial institution, by means of materially false and fraudulent pretenses, representations and promises, namely through the manner and means described in paragraphs 5 through 8 of Count One of the Information.

In violation of Title 18, United States Code, Section 1344.

COUNT TWO

(Aggravated Identity Theft)

On or about September 12, 2023, in Essex County, in the District of New Jersey and elsewhere, defendant,

JANE CROSBY

did knowingly transfer, possess, and use, without lawful authority, a means of identification of another person, namely the name and social security number of the Victim-1, during and in relation to a violation of Title 18, United States Code, Section 1344, as described in Count One of this Information knowing that the means of identification belonged to another actual person.

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

FORFEITURE ALLEGATION

Upon conviction of the offense charged in Count One of this Information, the defendant JANE CROSBY shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(2)(A), all property, real and personal, that constitutes or is derived from proceeds the defendant obtained directly or indirectly as a result of such offense, and all property traceable to such property.

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 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, it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b), to seek forfeiture of any other property of said defendant up to the value of the forfeitable property described above.

ROBERT FRAZER
United States Attorney

LAUREN D. KOBER
Assistant U.S. Attorney

Approved:

Bradley A. Harsch
Chief, Criminal Division