

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Criminal No. 19-
v. :
KATELYN MCCLURE : 18 U.S.C. § 1349

INFORMATION

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

The Defendant and Other Entities or Organizations

1. At all times relevant to this Information:
 - a. Defendant KATELYN MCCLURE was a resident of Florence Township, New Jersey. Defendant MCCLURE maintained bank accounts at PNC Bank.
 - b. Co-Conspirator 1, who was a co-conspirator but not named as a defendant herein, was a resident of Florence Township, New Jersey. Co-Conspirator 1 maintained access to, and control of, defendant MCCLURE's bank accounts.
 - c. Co-Conspirator 2, who was a co-conspirator but not named as a defendant herein, was a resident of Philadelphia, Pennsylvania and Florence Township, New Jersey. Co-Conspirator 2 maintained bank accounts at PNC Bank.
 - d. Company 1, headquartered in Redwood City, California, maintained a crowd sourcing fundraising website that allowed individuals and

organizations to raise money online for a variety of causes and circumstances. Company 1 used a third-party payment processor, Company 2, to pay out the donations.

The Conspiracy

2. From in or around November 2017 through in or around September 2018, in Burlington County, in the District of New Jersey and elsewhere, defendant

KATELYN MCCLURE

did knowingly and intentionally conspire and agree with Co-Conspirator 1, and with others, known and unknown, to devise a scheme and artifice to defraud individuals and to obtain money and property from individuals by means of materially false and fraudulent pretenses, representations, and promises, and, for the purpose of executing such scheme and artifice, transmitted and caused to be transmitted by means of wire communications in interstate and foreign commerce, certain signs, signals, and sounds, contrary to Title 18, United States Code, Section 1343.

The Object of the Conspiracy

3. It was the object of the conspiracy to obtain money from victims through false and fraudulent statements that Co-Conspirator 2 was a “good Samaritan” because he provided defendant KATELYN MCCLURE with money for gasoline after her car became disabled in Philadelphia, Pennsylvania.

Manner and Means of the Conspiracy

4. It was part of the conspiracy that Co-Conspirator 1 created a false

and fraudulent story that defendant KATELYN MCCLURE ran out of gas while in Philadelphia, Pennsylvania and that Co-conspirator 2, who was homeless, provided his last \$20 to defendant MCCLURE for gasoline.

5. It was further part of the conspiracy that defendant KATELYN MCCLURE established a crowd source funding page on Company 1's website that falsely recounted Co-Conspirator 2 acting as a good Samaritan.

6. It was further part of the conspiracy that at various times defendant KATELYN MCCLURE and Co-Conspirator 1 updated their crowd source funding page on Company 1's website.

7. It was further part of the conspiracy that based on the false and fraudulent information from defendant KATELYN MCCLURE and Co-Conspirator 1, victims from across the United States and internationally submitted donations to Company 1 on behalf of Co-Conspirator 2 in excess of \$400,000.

8. It was further part of the conspiracy that defendant KATELYN MCCLURE and Co-Conspirator 1 caused Company 1 to electronically transfer the funds to Company 2 for disbursement, electronically to a bank account in New Jersey controlled by defendant MCCLURE and Co-Conspirator 1.

9. It was further part of the conspiracy that defendant KATELYN MCCLURE and Co-Conspirator 1 used the funds to pay for luxury items, such as a BMW and expensive hand bags; go on trips; and to gamble at casinos in Pennsylvania, New Jersey and Las Vegas, Nevada.

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

Craig Carpenito

CRAIG CARPENITO
United States Attorney

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INFORMATION FOR

18 U.S.C. §1349

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