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

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UNITED STATES OF AMERICA : Hon. Mark Falk  
 :  
 v. : Mag. No. 21-1009  
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 ROSANNA LUCRECIA CRUEL BLANCO : **CRIMINAL COMPLAINT**  
 a/k/a "Rosanna Cruel" :

I, Special Agent Jeffrey Clark, being duly sworn, state that 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.

J. Clark 2/9/21 12:03pm  
Special Agent Jeffrey Clark  
Federal Bureau of Investigation

Special Agent Jeffrey Clark attested to this Complaint by telephone pursuant to Federal Rule of Criminal Procedure 4.1(b)(2)(A) on February 9, 2021 in New Jersey.

HONORABLE MARK FALK  
UNITED STATES MAGISTRATE JUDGE

Mark Falk 2/9/21 12:03pm (by JC)  
Signature of Judicial Officer

**ATTACHMENT A**

**Count One**  
**(Conspiracy to Commit Mail Fraud)**

From in or around December 2017 to in or around December 2020, in the District of New Jersey and elsewhere, the defendant

ROSANNA LUCRECIA CRUEL BLANCO  
a/k/a “Rosanna Cruel”

knowingly and intentionally conspired and agreed with others to devise and intend to devise a scheme and artifice to defraud, and to obtain monies, funds and other property from Company 1 and Telecom Company , by means of materially false and fraudulent pretenses, representations, and promises, and, for the purpose of executing such a scheme and artifice, cause to be delivered by mail according to the directions thereon matters and things to be sent and delivered by a private and commercial interstate carrier, contrary to Title 18, United States Code, Section 1341.

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

**Count Two**  
**(Aggravated Identity Theft)**

On or about April 23, 2018, in the District of New Jersey and elsewhere,  
the defendant

ROSANNA LUCRECIA CRUEL BLANCO  
a/k/a "Rosanna Cruel"

knowingly did transfer, possess, and use, without lawful authority, a means of identification of another person, namely, the name and signature of Victim 1 during and in relation to a felony violation enumerated in Title 18, United States Code, Section 1028A(c), to wit Title 18, United States Code, Sections 1341 and 1349, knowing that the means of identification belonged to another actual person.

In violation of Title 18, United States Code, Sections 1028A(a)(1), 1028A(b), and 2.

## **ATTACHMENT B**

I, Jeffrey Clark, am a Special Agent with the Federal Bureau of Investigation. I am fully familiar with the facts set forth herein based on my own investigation, my conversations with other law enforcement officers, and my review of reports, documents, and evidence. Where statements of others are related herein, they are related in substance and part. Because this complaint is being submitted for a limited purpose, I have not set forth each and every fact that I know concerning this investigation. Where I assert that an event took place on a particular date, I am asserting that it took place on or about the date alleged.

### **Background**

1. At all times relevant to this complaint:
  - a. ROSANNA LUCRECIA CRUEL BLANCO (“BLANCO”) was a resident of Bronx, New York.
  - b. Telecom Company sold cellular telephones and wireless network services. Telecom Company’s executive leadership and corporate functions were headquartered in Basking Ridge, New Jersey.
  - c. Company 1 was a company headquartered in Nashville, Tennessee. Company 1 was one of the largest providers of wireless handset insurance in the world and administered handset insurance for Telecom Company.
  - d. When a customer opened an account with Telecom Company for cellular telephone service, the customer had the option of enrolling in a cellular phone insurance program administered by Company 1.
  - e. When customers enrolled in the Company 1 insurance program, they paid an upfront fee to qualify. Once active, if the customer’s cellular phone associated with the Telecom Company account was damaged, lost, or stolen, the customer could file a claim with Company 1 and receive a new cellular phone from Company 1.
  - f. If the customer filed a claim, Company 1 shipped a new handset to the customer via Federal Express (“FedEx”) or United Parcel Service (“UPS”).
  - g. Victim 1 was a resident of Bronx, New York.

### **The Scheme to Defraud**

2. From in or around December 2017 to in or around December 2020, BLANCO and others devised a scheme to fraudulently obtain replacement

cellular phones from Company 1 by assuming the identities of Telecom Company customers and filing false claims under Company 1's handset insurance program.

3. The handsets were predominantly Apple iPhones with a value of approximately \$700 to \$1,000 per handset.

4. As part of the scheme, BLANCO and others would contact Company 1, pose as the legitimate Telecom Company customer, apply for handset insurance on the existing customer account, and then pay the upfront fee to activate the handset insurance. Once the insurance was activated, BLANCO and others would make a false claim to Company 1 of damage, theft, or loss on the handset associated with the account with the newly procured insurance policy.

5. As part of the Company 1 claims process, BLANCO and others provided Company 1 with false identification. This identification was typically in the form of a fake New York or New Jersey driver's license falsified to reflect the name of the legitimate Telecom Company customer.

6. Also, as part of the Company 1 claims process, BLANCO and others would provide Company 1 with shipping contact names and addresses that were different from the actual customer name and address associated with the Verizon account. The new shipping addresses included locations in the Bronx, Yonkers, White Plains, Manhattan, and various locations in New Jersey, some of which appear to be directly related to BLANCO and others associated with the scheme. In many instances, BLANCO provided her own name (or derivations thereof), or the names others, as the contact person and intended recipient of the delivery of the replacement handsets. Based on the claim information and the false identification provided to Company 1, Company 1 would then ship the replacement cellular telephone via UPS or FedEx to the new contact name and address.

a. For example, on or about April 23, 2018, a fraudulent claim was submitted to Company 1 for a Telecom Company account held by Victim 1. BLANCO and others submitted a fake New Jersey driver's license in Victim 1's name in support of the claim. Law enforcement confirmed with the New Jersey Motor Vehicle Commission that the New Jersey license provided to Company 1 in Victim 1's name was not Victim 1's driver's license. Company 1 was also provided with the false shipping contact name of "Rosalucrecia CBlanco" and a new shipping address in White Plains, New York. Company 1 shipped this replacement handset via UPS to this address, which was not associated with Victim 1, and the recipient was recorded by UPS as "Lucrecia."

7. To further the scheme, BLANCO and others maintained numerous credit cards, pre-paid debit cards, and bank account debit cards to pay the

upfront fee to Company 1 in order to obtain the handset insurance. Once BLANCO and others verified that the replacement telephone was shipped or delivered, they canceled the insurance with Company 1 and received a refund of the upfront fee.

a. For example, a debit card issued to BLANCO from an account at Citibank held in BLANCO'S name (the "BLANCO Citibank Account") was used to pay the insurance fees to Company 1 on two separate fraudulent claims that were filed with Company 1 in June 2020. The BLANCO Citibank Account bank statements for June 2020 show that within a day of posting these two transactions, the payments were reversed, and the funds were credited back into BLANCO's account. The shipping contact names provided to Company 1 for these two claims were "Lucrecia Rosan" and "Rosnna C."

8. On many occasions, BLANCO and others contacted Company 1 and claimed that the replacement telephones arrived damaged and needed to be replaced again, resulting in additional shipments of replacement telephones. Law enforcement has determined that in some of these instances, BLANCO provided her own name (or a derivation thereof) as the contact person and intended recipient of the shipment of second replacement phone.

9. Company 1 has an electronic claims processing system that allows the company to capture the telephone number of the cellular telephone used to make a claim. According to Company 1, their system identified that many of the fraudulent claims were made using the same cellular telephone number, which is the contact number for BLANCO on her BLANCO Citibank account.

10. During the above-referenced time period, Company 1 ultimately shipped over 100 replacement cellular telephones to BLANCO and others as a result of their fraudulent scheme. Total losses from the scheme exceed \$250,000.