

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA	:	Hon.
	:	
v.	:	Crim. No. 21-
	:	
ROSANNA LUCRECIA CRUEL BLANCO	:	18 U.S.C. § 1349
a/k/k "Rosanna Cruel"	:	

INFORMATION

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

COUNT ONE
(Conspiracy to Commit Mail Fraud)

Background

1. At all times relevant to this Information:
 - a. Defendant Rosanna Lucrecia Cruel Blanco, a/k/a "Rosanna Cruel" ("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 a 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 Conspiracy

2. From at least as early as in and around November 2017 through in and around January 2021, in the District of New Jersey, and elsewhere, defendant

ROSANNA 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.

Goal of the Conspiracy

3. It was the goal of the conspiracy for BLANCO and others (the “Coconspirators”) to enrich themselves by fraudulently obtaining replacement cellular telephones through the submission of false insurance claims to Company 1.

Manner and Means of the Conspiracy

4. It was part of the conspiracy that:

a. From at least as early as in and around December 2017 through in and around January 2021, BLANCO and the Coconspirators 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.

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

c. As part of the scheme, BLANCO and the Coconspirators would contact Company 1, pose as the legitimate Telecom Company customer, and apply and pay for handset insurance on the existing customer account. Once the handset insurance was activated, BLANCO and the Coconspirators 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.

d. To facilitate the scheme, BLANCO and the Coconspirators provided Company 1 with false identification, typically in the form of a New York or New Jersey driver's license falsified to reflect the name of the legitimate Telecom Company customer.

e. BLANCO and the Coconspirators would also 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 were directly related to BLANCO and the Conspirators associated with the scheme.

f. In many instances, BLANCO provided her own name as the contact person and intended recipient of the delivery of the replacement handsets. Based on the false information provided to Company 1, Company 1 would then ship the replacement cellular telephone via UPS or FedEx to the new contact name and address, leaving Company 1 and Telecom Company to bear the losses associated with the value of the handsets as a result of the scheme.

g. Due to the foregoing conduct, Company 1 and Telecom Company suffered total loses of over \$200,000.

All in violation of Title 18, United States Code, Section 1349.

FORFEITURE ALLEGATION

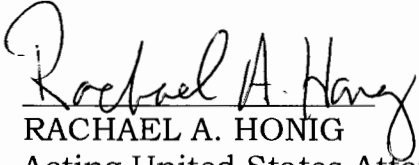
1. The allegations contained in Count One of this Information are hereby realleged and incorporated by reference for the purpose of alleging forfeiture, pursuant to Title 18, United States Code, Section 982(a)(2).

2. The United States hereby gives notice to defendant BLANCO that, upon his conviction of the offense alleged in Count One of this Information, the government will seek forfeiture in accordance with Title 18, United States Code, Section 982(a)(2), which requires any person convicted of such an offense to forfeit any property, real or personal, which constitutes or is derived from proceeds obtained directly or indirectly as a result of such offense.

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

- 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 28, United States Code, Section 2461(c), to seek forfeiture of any other property of defendant BLANCO up to the value of the forfeitable property described above.


RACHAEL A. HONIG
Acting United States Attorney

CASE NUMBER: _____

**United States District Court
District of New Jersey**

UNITED STATES OF AMERICA

v.

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

INFORMATION FOR

18 U.S.C. § 1349

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