

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA	:	Hon.
	:	
v.	:	Crim. No. 21-
	:	
TONG LOR	:	18 U.S.C. § 1349
a/k/k “Mandy Carr”	:	

**I N F O R M A T I O N**

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

**COUNT ONE**  
**(Conspiracy to Commit Mail Fraud)**

**Overview**

1. From in or about 2017 through in or about May 2021, Defendant TONG LOR (“LOR”), a/k/a “Mandy Carr,” a resident of Riverdale and Modesto, California, orchestrated a large scale scheme to counterfeit and sell fraudulent coupons using the United States Postal Service (“USPS”) mail system that caused over \$9.9 million in losses.

2. A Catalina Coupon (“CC”) was a full-color, rectangular paper coupon that was part of a program created by numerous manufacturers of household products (e.g., diapers and laundry detergent) and honored by hundreds of participating retail stores located throughout the United States.

3. The CCs were generated from the manufacturers or by the participating retailers using dedicated Catalina printers that used specialized Catalina ink and paper only available from authorized sources. The printers

were typically located near the registers in the checkout area of the participating retail stores.

4. CCs had a set discounted value that was redeemed by a participating retailer when a consumer purchased a product covered by the coupon. Among other information, each CC had a scannable bar code that contained the value of the discount, product specifications, and expiration date.

5. Once redeemed, CCs were sent by the retail store to a clearinghouse that scanned the CCs' codes and determined whether the CCs were legitimate or counterfeit. If counterfeit, then the participating retailers incurred the initial loss (the value of discount applied at the time of redemption) but, ultimately, the loss to the retailers from the counterfeit CCs was shared with the manufacturers of the discounted products.

6. Victim 1 was a national pharmacy chain that sold household items and participated in the redemption of CCs.

a. USPS Click-N-Ship Service was a service that allowed USPS customers to create pre-paid USPS shipping labels that were applied to packages. The customer then dropped off the package at a USPS facility for shipment domestically.

### **The Conspiracy**

7. From at least as early as in or about 2017 through in or about May 2021, in the District of New Jersey, and elsewhere, defendant

TONG LOR  
a/k/a "Mandy Carr"

knowingly and intentionally conspired and agreed with others to devise and intend to devise a scheme and artifice to defraud, and to obtain money and property from hundreds of domestic manufacturers and retailers, including Victim 1, by means of false and fraudulent pretenses, representations, and promises, and to sell, distribute, supply, and furnish and procure for unlawful use any counterfeit and spurious coin, obligation, security, and other article, and anything represented to be and intimated and held out to be such counterfeit and spurious article, and for the purpose of executing such scheme and artifice, placed in any post office or authorized depository for mail, any matter or thing whatever to be sent or delivered by the USPS, and took and received therefrom, any such matter or thing, and knowingly caused to be delivered by mail according to the direction thereon, or at the place at which it is directed to be delivered by the person to whom it is addressed, any such matter or thing, contrary to Title 18, United States Code, Section 1341.

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

**Goal of the Conspiracy**

8. It was the goal of the conspiracy for LOR and others (the “Coconspirators”) to enrich themselves by having LOR fraudulently sell, and the Coconspirators knowingly purchase, counterfeit CCs that would then be redeemed by the Coconspirators at retail stores across the United States.

### **Manner and Means of the Conspiracy**

9. It was part of the conspiracy to defraud that:

a. From in or about 2017 through in or about May 2021, LOR was involved in a large-scale operation to produce and sell approximately 100,000 counterfeit CCs using several Internet chat groups accessible via the Internet website Telegram Messenger, Inc. ("Telegram"), a messaging service that uses end-to-end encryption.

b. Once the Coconspirators had purchased the counterfeit CCs via Telegram, LOR would falsely code and print the coupons using Catalina paper, Catalina ink, and a Catalina printer that LOR had obtained from unauthorized sources.

c. In furtherance of the scheme, LOR mailed the counterfeit CCs to the Coconspirators using USPS via a USPS Click-N-Ship account registered to her and opened in or about December 2017.

d. Over the course of the conspiracy, LOR mailed over 13,000 shipments of counterfeit CCs using USPS.

e. As part of the scheme, once the Coconspirators received the counterfeit CCs, the Coconspirators redeemed the coupons at hundreds of domestic retail stores, including at Victim 1.

f. Due to LOR's and the Coconspirators' conduct, product manufacturers and retail stores, including Victim 1, suffered losses in excess of \$9.9 million.

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

**FORFEITURE ALLEGATION**

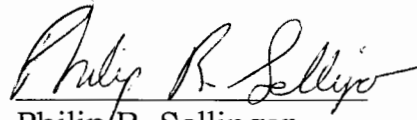
1. Upon conviction of the offense in violation of 18 U.S.C. § 1349, as charged in Count One of this Information, defendant LOR shall forfeit to the United States, pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), all property, real and personal, the defendant obtained that constitutes or is derived from proceeds traceable to the commission of such offense, and all property traceable to such property, including, but not limited to, a sum of money equal to \$727,155.00, representing the proceeds of the offense charged in Count One of this Information, and all property traceable to such property.

**Substitute Assets Provision**

2. 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 person;
- (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 subdivided without difficulty;

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), as incorporated by 28 U.S.C. § 2461(c), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

A handwritten signature in black ink, reading "Philip R. Sellinger". The signature is written in a cursive style with a horizontal line underneath the name.

Philip R. Sellinger  
United States Attorney