

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

UNITED STATES OF AMERICA	:	Hon. Leda Dunn Wettre
	:	
v.	:	Magistrate. No. 24-13217
	:	
JANE CROSBY	:	<b>CRIMINAL COMPLAINT</b>
	:	

I, Scott J. Bloomdahl, being duly sworn, state 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 Department of the Army Criminal Investigation Division ("CID"), and that this complaint is based on the following facts:

**SEE ATTACHMENT B**

continued on the attached pages and made a part hereof.

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Scott J. Bloomdahl, Special Agent  
Army Criminal Investigation Division

Special Agent Bloomdahl attested to this Affidavit by telephone pursuant to F.R.C.P. 4.1(B)(2)(A) on this 9th day of September, 2024.

/s/ Leda Dunn Wettre (LDK)  
Hon. Leda Dunn Wettre United  
States Magistrate Judge

**ATTACHMENT A**

**COUNT ONE**

(Bank Fraud)

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

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

**COUNTS TWO THROUGH EIGHT**  
(Aggravated Identity Theft)

On or about the dates set forth below, 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 individuals set forth, during and in relation to a violation of Title 18, United States Code, Section 1344, as described in Count One of this Complaint, knowing that the means of identification belonged to another actual person:

<b>COUNT</b>	<b>APPROXIMATE DATE</b>	<b>VICTIM</b>
Two	September 12, 2023	Victim-1
Three	September 27, 2023	Victim-2
Four	October 13, 2023	Victim-3
Five	October 18, 2023	Victim-4
Six	December 12, 2023	Victim-5
Seven	December 20, 2023	Victim-6
Eight	December 27, 2023	Victim-7

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

## **ATTACHMENT B**

I, Scott J. Bloomdahl, am a Special Agent of the Department of the Army Criminal Investigation Division (“CID”). I am fully familiar with the facts set forth herein based on my own investigation and my review of reports and discussions with other law enforcement personnel and other individuals. Because this Complaint is being submitted for a limited purpose, I have not set forth each and every fact known to me concerning this investigation. Where the contents of documents and the actions and statements of others are reported, they are reported in substance and in part, except where otherwise indicated. 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 Criminal Complaint:
  - a. Defendant Jane Crosby (“CROSBY”) is a Sergeant First Class in the U.S. Army and U.S. Army Recruiter. CROSBY is assigned to an Army recruiting station in East Orange, New Jersey (the “Recruiting Station”).
  - b. “Credit Union-1” is a federally insured credit union with branches across the United States and worldwide, including in New Jersey.

### **OVERVIEW**

2. As set forth in detail below, CROSBY engaged in a fraudulent scheme to defraud Credit Union-1 by using her position as a U.S. Army Recruiter to obtain personal identifying information (“PII”) belonging to recruits, recruit candidates, and others (the “Victims”), and then submit fraudulent account applications to Credit Union-1 without the Victims’ knowledge. Namely, between or about September 12, 2023, and on or about December 27, 2023, CROSBY had “Pre-Active Duty Membership” accounts created for seven identified Victims, even though only one joined the military and two had no known affiliation with the Department of Defense. CROSBY applied for over approximately \$266,000 in loans and credit card accounts by using the Victims’ PII, and also used some of the bank accounts to deposit fraudulent checks and withdraw funds.

### **SUMMARY OF INVESTIGATION**

#### ***Victim-1***

3. Victim-1 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.

4. On or about September 12, 2023, CROSBY submitted a Pre-Active Duty Membership application in Victim-1's name to a regional outreach manager ("Manager-1") of Credit Union-1 for processing. The application included Victim-1's name, Social Security Number, the address of the Recruiting Station, and an office telephone number ending in 2537 (the "2537 Number"). The 2537 Number was also listed in CROSBY's email signature.

5. On or about September 27, 2023, a call was made from the 2537 Number to Credit Union-1's call center. The caller, who appeared to be a woman who was attempting to disguise her voice, inquired about Victim-1's account, including the PIN number. The caller further indicated that the 2537 Number was the phone number for the account.

6. Later that day, Victim-1's account was accessed from a mobile device, and a \$50,000 consumer loan application was submitted but declined.

7. On or about October 4, 2023, a United States Treasury check was deposited into Victim-1's account via mobile access. The check was declined because it appeared to be suspicious. The mobile device ID number was the same as the one used during the September 27, 2023 login.

8. On or about October 12, 2023, a credit card application was submitted in Victim-1's name via Credit Union-1's mobile application. The application was approved, but a card was never issued because the next day, an alert was placed on the account and the credit card approval was canceled.

9. On or about October 13, 2023, a caller, who identified themselves as Victim-1, called Credit Union-1's call center to try to restore access to Victim-1's account. This call was placed from a phone number ending in 1324 (the "1324 Number"). The caller provided Victim-1's name, date of birth, and partial Social Security Number. CROSBY had previously reported to the Department of Defense that the 1324 Number is her personal phone number. This caller sounded like the same caller from the September 27, 2023 call.

10. On or about October 17, 2023, a caller posing as Victim-1 called Credit Union-1's call center again to inquire about restrictions on the account. The caller claimed that their wife tried to log in to Victim-1's account because Victim-1 was in training. This caller sounded like the same caller from the September 27, 2023 and October 13, 2023 calls. On or about October 19, 2023, the account restrictions were lifted because of the report that Victim-1 was actively deployed and gave his wife the credentials to access the account.

11. Also, on or about October 19, 2023, another credit card application and consumer loan application were submitted using Victim-1's PII; these applications were denied. On or about October 20, 2023, two additional credit

card and one loan applications were submitted in Victim-1's name<sup>1</sup>; another credit card application was submitted on or about October 26, 2023. These applications were all denied.

12. On or about November 21, 2023, another credit card application was submitted in Victim-1's name; however, this application included Victim-4's email address. That day, Credit Union-1's call center received three phone calls from a phone number ending in 9484 (the "9484 Number"). During those calls, the caller attempted to remove restrictions on Victim-1's account. The caller for all three calls sounded like the same caller from the September 27, 2023, October 13, 2023, and October 17, 2023 calls. Open-source searches revealed that this phone numbers belonged to Company-1, a company with a cellphone application that allows a user to customize and/or create a duplicate phone number. This phone number was registered to the IP address assigned to the Recruiting Station.

13. Victim-1 stated to law enforcement, in substance and in part, that he never applied for loans, credit cards, or an account with Credit Union-1 during the relevant time period, nor did he recognize the applications made in his name. Victim-1 did not recognize the voice on the October 17, 2023 call, and explained that the caller could not be his wife because his wife does not speak English.

### ***Victim-2***

14. On or about September 27, 2023, CROSBY submitted a Pre-Active Duty Membership application in Victim-2's name and Social Security Number to another regional outreach manager ("Manager-2") of Credit Union-1 for processing. The address listed on the application was the Recruiting Station's address. Manager-2 asked CROSBY if Victim-2 was in fact using the Recruiting Station as his address, and CROSBY replied, "Yes because [his] living situation[] isn't the best."

15. Between on or about October 2, 2023 and October 4, 2023, two checks payable to Victim-2, which totaled approximately \$8,575, were deposited via Credit Union-1's mobile application into Victim-2's account. Thereafter, approximately \$4,324 was debited from Victim-2's account through money orders, ATM withdrawals, and other expenditures. The account was then restricted on October 5, 2023.

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<sup>1</sup> Also, on October 20, 2023, an auto loan application in Victim-1's name was submitted then canceled.

16. Victim-2 stated to law enforcement, in substance and in part, that Victim-2 spoke with U.S. Air Force and U.S. Army recruiters at the Recruiting Station but did not join the military. Victim-2 further stated that he never opened an account with Credit Union-1, nor did he give anyone permission to open one on his behalf. Recruiting records further reflect that Victim-2 was a U.S. Army applicant from in or around August 2023 through in or around December 2023.

### ***Victim-3***

17. On or about October 13, 2023, CROSBY submitted a Pre-Active Duty Membership application in Victim-3's name and Social Security Number to Manager-2. As part of the application, CROSBY included copies of Victim-3's Passport and Social Security card.

18. On or about October 17, 2023, the address associated with Victim-3's account was changed via a mobile device from a residential address in East Orange, New Jersey, to the Recruiting Station's address.

19. Also, on or about October 17, 2023, a credit card application and two consumer loan applications were submitted under Victim-3's account; one loan application was canceled, and the other applications were denied.

20. On or about October 18, 2023, two credit card applications and a consumer loan application were submitted through Victim-3's account; these applications were also denied. That same day, a Credit Union-1 employee found inconsistencies within the applications and froze the account.

21. Victim-3 stated to law enforcement, in substance and in part, that Victim-3 had unsuccessfully attempted to join the U.S. Army through the Recruiting Station. Victim-3 further stated that he never opened an account with Credit Union-1, nor did he know how the account was created.

### ***Victim-4***

22. On or about October 18, 2023, CROSBY submitted a Pre-Active Duty Membership application in Victim-4's name to Manager-2. The application contained Victim-4's name, date, of birth, Social Security Number, and an address in Orange, New Jersey. As part of the application, CROSBY included copies of Victim-4's driver's license and Social Security card. Manager-2 responded via email that the address on Victim-4's application did not match the address on his license, as required. CROSBY responded that Victim-4 must have made a mistake.

23. On or about November 7, 2023, a United States Treasury check was deposited into Victim-4's account via mobile access. Credit Union-1 declined this check because it was suspicious. Also on November 7, 2023, a credit card application was submitted in Victim-4's name. This application was approved, and Credit Union-1 issued a credit card ending in 1222 with a limit of \$14,900. On the same date, the address associated with Victim-4's account was changed via mobile device from a residential address in East Orange, New Jersey to the Recruiting Station's address.

24. On or about November 9, 2023, a \$10,000 consumer loan application was submitted in Victim-4's name; this application was declined.

25. On or about November 15, 2023, the credit card ending in 1222 was used to purchase two airline tickets, one in CROSBY's name and one in the name of CROSBY's relative. Based on information obtained during the investigation, law enforcement learned that CROSBY and CROSBY's relative traveled from Las Vegas to New York City with the airline tickets that were purchased with the credit card ending in 1222.

26. On or about November 17, 2023, an external ACH account<sup>2</sup> was added to Victim-4's account and a one-time transfer of \$1,500 was attempted. Several calls and voicemails over the next few days to the phone number on file for Victim-4 went unanswered.

27. On or about November 19, 2023, a credit card application and consumer loan application were submitted in Victim-4's name; both were declined.

28. On or about November 21, 2023, several calls were made to Credit Union-1's call center from the 9484 Number. The caller attempted to access Victim-4's account but was unsuccessful. This caller sounded to be the same individual who made calls regarding Victim-1's account.

29. The IP address used to access Victim-1 and Victim-4's accounts was also used to access the Credit Union-1 accounts associated with CROSBY and two of CROSBY's relatives. Subscriber information confirm that this IP address was assigned to an account in the name of CROSBY's relatives at CROSBY's known address.

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<sup>2</sup> An ACH (Automated Clearing House) transfer allows the electronic movement of money between accounts at various banks or credit unions.

30. Victim-4 stated to law enforcement, in substance and in part, that Victim-4 unsuccessfully attempted to enlist in the U.S. Army through the Recruiting Station in 2022 and again in 2023. Victim-4 further stated that he had no knowledge of the checks, loan applications, credit card applications, or purchases made through the Credit Union-1 account in his name, nor had he ever called Credit Union-1.

### ***Victim-5***

31. On or about December 12, 2023, CROSBY submitted a Pre-Active Duty Membership application in Victim-5's name and Social Security Number to Manager-2 via email. As part of the application, CROSBY included copies of Victim-5's driver's license and Social Security card.

32. On or about December 18, 2023, a \$13,691.78 U.S. Treasury check payable to Victim-5 was deposited by an unidentified woman into the Credit Union-1 account in Victim-5's name through a Credit Union-1 ATM located in Cherry Hill, New Jersey (the "Chery Hill ATM"). This transaction was captured on video. Thereafter, most of these funds were debited from Victim-5's account through money orders, ATM withdrawals, and other expenditures.

33. On or about December 27, 2023, a \$25,000 consumer loan application was submitted in Victim-5's name via Credit Union-1's online application. This application was denied.

34. On or about January 5, 2024, a \$11,122.68 check payable to Victim-5 was deposited into Victim-5's checking account via Credit Union-1's mobile application. This check was rejected.

35. On or about January 8, 2024, the same check was deposited into Victim-5's account via the Cherry Hill ATM. This transaction was captured on video. The check was returned as not authorized, and Victim-5's account was restricted.

36. When contacted by Credit Union-1, Victim-5 stated to Credit Union-1, in substance and in part, that Victim-5 never opened an account at Credit Union-1.

### ***Victim-6***

37. On or about December 20, 2023, CROSBY submitted a Pre-Active Duty Membership application in Victim-6's name and Social Security Number to Manager-2 via email. As part of the application, CROSBY included copies of Victim-6's driver's license, Social Security card, and U.S. passport.

38. On or about December 23, 2023, a credit card application was submitted on Victim-6's behalf via Credit Union-1's online application and was approved, with a limit of \$20,000. However, this credit account was never activated.

39. Victim-6 told Credit Union-1, in substance and in part, that Victim-6 intended to join the U.S. Army, and visited the Recruiting Station and provided identification and his passport; however, he never joined the military or authorized anyone to open a Credit Union-1 account or apply for a credit card on his behalf. Recruiting records confirm that Victim-6 applied to the U.S. Army through the Recruiting Station but did not ultimately enlist.

### ***Victim-7***

40. On or about December 27, 2023, CROSBY submitted a Pre-Active Duty Membership application in Victim-7's name and Social Security to Manager-1. The application listed both a Brooklyn, New York address (the "Brooklyn Address") as Victim-7's home address and an Elizabeth, New Jersey address (the "Elizabeth Address") as Victim-7's mailing address. As part of the application, CROSBY included copies of Victim-7's driver's license and Social Security card.

41. A debit card was thereafter mailed to the Elizabeth Address. On or about January 6, 2024, the address on the account was changed to the Brooklyn Address.

42. On or about January 10, 2024, an unidentified woman deposited \$5.00 into Victim-7's account via a Credit Union-1 ATM located in Willow Grove, Pennsylvania to fund the account. The woman then deposited a \$19,705 check into Victim-7's account via the same ATM. The debit card mailed to the Elizabeth Address was used for both these transactions. The transactions were video recorded, and the woman appears to be the same woman who deposited the checks into Victim-5's account via the Cherry Hill ATM on or about December 18, 2023.

43. Thereafter, over approximately \$17,400 was withdrawn from Victim-7's account through ATMs, money orders, and other expenditures. One of the ATM withdrawals was made at the Cherry Hill ATM on or about January 23, 2024. This transaction was video recorded and appeared to have been made by the same woman who deposited the checks into Victim-5's account on or about December 18, 2023, and Victim-7's account on or about January 10, 2024.

44. Victim-7 stated to Credit Union-1, in substance and in part, that he did not open a Credit Union-1 account, had never been in the U.S. Military and had not visited any recruiting offices.