

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA	:	Criminal No. 17-
v.	:	
PATRICK GIBLIN	:	18 U.S.C. § 1952(a)(3)

INFORMATION

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

Background

1. At all times relevant to this Information:
 - a. Defendant PATRICK GIBLIN was a resident of Atlantic County, New Jersey or Philadelphia County, Pennsylvania.
 - b. Quest and Lavalife (collectively referred to herein as the “telephone dating services”) offered telephone-based interactive personal and dating services. The telephone dating services allowed a user to telephonically post greetings and advertisements on the system and to chat, among other services. The telephone dating services had local telephone numbers throughout the United States and provided services in all of these locations.
 - c. Western Union Financial Services, Inc. (“Western Union”) and MoneyGram International (“MoneyGram”) (collectively referred to herein as the “wire transfer services”) provided money transfer services to customers throughout the United States and the world. The wire transfer services maintained numerous agent locations to send wire transfers of money from one customer to another in exchange for a fee. MoneyGram also permitted customers to load money directly to a debit card in exchange for a fee.

Interstate Travel and Use of an Interstate Facility to Promote Unlawful Activity

2. Between in or about January 2013 and on or about December 16, 2014, defendant PATRICK GIBLIN, using multiple telephone numbers:

a. posted numerous messages, advertisements, and greetings on the telephone dating services, which corresponded to various geographic areas around the United States;

b. targeted single women through the telephone dating services, cultivated a telephone rapport with each woman, and falsely professed an interest in pursuing a romantic relationship;

c. falsely represented to the women whom he targeted that he would be relocating or travelling to the woman's geographic area;

d. falsely represented that he wished to pursue a committed, romantic relationship with the woman upon his arrival,

e. falsely represented that he needed money, in the form of a loan, for relocation and travel expenses or for other personal reasons, which he promised to repay knowing that he would not repay the loan;

f. falsely represented his employment status, familial relations, and background to induce the victim women to succumb to his scheme.

3. In furtherance of the scheme set forth above, defendant PATRICK GIBLIN directed the targeted woman to use the wire transfer services to send money to him. Defendant GIBLIN then collected the money from a Western Union or MoneyGram terminal location or he would receive the money after it was directly deposited through an interstate MoneyGram transfer onto a payroll/debit card, which defendant GIBLIN maintained and utilized.

4. In furtherance of and to promote the scheme set forth above, defendant PATRICK GIBLIN, after receiving money from women directly onto his payroll/debit card, conducted

financial transactions with that payroll/debit card by purchasing airtime minutes with a wireless telephone service. Defendant Giblin purchased these minutes in order to promote and carry on the scheme to defraud so that he could contact additional women over the telephone.

5. In or about October 2014, defendant PATRICK GIBLIN travelled from Atlantic County, New Jersey to Albany County, New York. While travelling and while in Albany County, New York, defendant GIBLIN continued to receive money from women onto his payroll/debit card, conducted financial transactions with that card to purchase airtime minutes with a wireless telephone service, and, using those minutes, continued to telephonically contact women in furtherance of the scheme to defraud.

6. In or about October 2014, in the District of New Jersey and elsewhere, defendant
PATRICK GIBLIN
traveled in interstate commerce from the State of New Jersey to the State of New York and used a facility in interstate commerce, namely a cellular telephone, with the intent to promote, manage, establish, carry on and facilitate the promotion, management, establishment and carrying on of an unlawful activity, that is, money laundering, contrary to 18 U.S.C. § 1956(a)(1)(A)(i), in furtherance of the specified unlawful activity, namely the wire fraud scheme as set forth in paragraphs 1 through 3 above, and thereafter performed and attempted to perform an act to promote, manage, establish and carry on, and to facilitate the promotion, management, establishment and carrying on of such unlawful activity.

In violation of 18 U.S.C. § 1952(a)(3).


PAUL J. FISHMAN
United States Attorney

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UNITED STATES OF AMERICA

v.

PATRICK GIBLIN

INFORMATION FOR

18 U.S.C. § 1952(a)(3)

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