

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Criminal No. 19-
v. :
JOHNNY BOBBIT, Jr. : 18 U.S.C. § 1956(h)

INFORMATION

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

The Defendant and Other Entities or Organizations

1. At all times relevant to this Information:
 - a. DEFENDANT JOHNNY BOBBIT, Jr. was a resident of Philadelphia, Pennsylvania and Florence Township, New Jersey. Defendant BOBBIT maintained bank accounts at PNC Bank.
 - b. Katelyn McClure, who was a co-conspirator but not named as a defendant herein, was a resident of Florence Township, New Jersey. McClure maintained bank accounts at PNC Bank.
 - c. Co-Conspirator 1, who was a co-conspirator but not named as a defendant herein, was a resident of Florence Township, New Jersey. Co-Conspirator 1 maintained access to, and control of, McClure's bank accounts.
 - d. Company 1, headquartered in Redwood City, California, maintained a crowd sourcing fundraising website that allowed individuals and organizations to raise money online for a variety of causes and circumstances.

Company 1 used a third-party payment processor, Company 2, to pay out the donations.

The Conspiracy

2. On or about December 27, 2017, in Burlington County, in the District of New Jersey and elsewhere, defendant

JOHNNY BOBBIT, Jr.

did knowingly conspire and agree with Katelyn McClure and Co-Conspirator 1 and with others to engage in a monetary transaction, namely, deposits, withdrawals, transfers and exchanges of United States currency and monetary instruments, by, through and to a financial institution, affecting interstate and foreign commerce, in criminally derived property of a value greater than \$10,000 that was derived from specified unlawful activity, that is, wire fraud, in violation of Title 18, United States Code, Section 1343, contrary to Title 18, United States Code, Section 1957.

3. It was part of the conspiracy that Co-Conspirator 1 created a false and fraudulent story that Katelyn McClure ran out of gas while in Philadelphia, Pennsylvania and that defendant JOHNNY BOBBIT, Jr., who was homeless, provided his last \$20 to McClure for gasoline.

4. It was further part of the conspiracy that Katelyn McClure established a crowd source funding page on Company 1's website that falsely recounted that defendant JOHNNY BOBBIT, Jr. acted as a good Samaritan.

5. It was further part of the conspiracy that at various times Katelyn McClure and Co-Conspirator 1 updated their crowd source funding page on

Company 1's website.

6. It was further part of the conspiracy that based on the false and fraudulent information victims from across the United States and internationally submitted donations to Company 1 on behalf of defendant JOHNNY BOBBIT, Jr., in excess of \$400,000.

7. It was further part of the conspiracy that Katelyn McClure and Co-Conspirator 1 caused Company 1 to transfer the funds to Company 2 for disbursement to a bank account in New Jersey controlled by McClure and Co-Conspirator 1.

8. As part of the conspiracy, defendant JOHNNY BOBBIT, Jr., Katelyn McClure and Co-Conspirator 1 caused a financial transaction affecting interstate and foreign commerce to occur, that was on December 27, 2017, McClure transferred \$25,000 from her bank account and deposited into defendant BOBBIT's bank account.

In violation of Title 18, United States Code, Section 1956(h).


CRAIG CARPENITO
United States Attorney

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INFORMATION FOR

18 U.S.C. § 1956

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