

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW HAMPSHIRE

U.S. DISTRICT COURT  
DISTRICT OF NH  
FILED

UNITED STATES OF AMERICA )  
 )  
 v. )  
 )  
 JACQUELINE MASSE )  
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2019 OCT -1 A 9:30

19:cr- 197 01- JL

**INFORMATION**

THE UNITED STATES ATTORNEY charges:

At all times material and relevant to this Information:

**BACKGROUND**

1. The defendant, JACQUELINE MASSE (“MASSE”), was a resident of Hampton, New Hampshire. Masse had three adult children, “K.M.-1,” “K.M.-2,” and “K.M.-3.”

2. From in and around August 2015 through in and around November 2016, MASSE falsely stated in demand letters addressed to the restaurants and food companies (“businesses”) identified below that she became ill after she ate food sold by the businesses, which required her to be admitted to the following hospitals:

	<b>Date of Letter</b>	<b>Date of Alleged Illness</b>	<b>Business</b>	<b>Hospital</b>
a	08/26/15	12/31/14	Churrascaria Aveirensense	Saints Medical Center
b	03/01/16	08/29/15	Fig & Olive	Saints Medical Center
c	11/16/15	10/04/15	New England Natural Bakers	Elliott Hospital
d	05/23/17	05/28/16	Alejandro’s Taqueria	Saints Medical Center
e	11/09/16	09/24/16	Kroger Foods	Elliott Hospital

3. From in and around March 2015 through in and around September 2017, MASSE falsely stated in demand letters addressed to the businesses identified below that K.M.-1 became seriously ill after K.M.-1 ate food sold by the businesses, which required K.M.-1 to be admitted to the following hospitals:

	<b>Date of Letter</b>	<b>Date of Alleged Illness</b>	<b>Business</b>	<b>Hospital</b>
a	03/01/15	12/31/14	Churrascaria Aveirensense	Lowell General Hospital
b	Undated	08/29/15	Fig & Olive	Lowell General Hospital
c	09/26/17	03/28/17	Chicken & Rice Guys	Parkland Medical Center

4. From in and around September 2017 through in and around November 2017, MASSE falsely stated in demand letters addressed to the businesses identified below that K.M.-2 became seriously ill after K.M.-2 ate food sold by the businesses, which required K.M.-2 to be admitted to the following hospitals:

	<b>Date of Letter</b>	<b>Date of Alleged Illness</b>	<b>Business</b>	<b>Hospital</b>
a	09/19/17	08/30/15	Fig & Olive	Parkland Medical Center
b	11/02/17	06/28/17	Clif Bar Company	Elliott Hospital

5. From in and around February 2018 through in and around May 2018, MASSE falsely stated in demand letters addressed to the businesses identified below that K.M.-3 became seriously ill after K.M.-3 ate food sold by the businesses, which required K.M.-3 to be admitted to the following hospitals:

	<b>Date of Letter</b>	<b>Date of Alleged Illness</b>	<b>Business</b>	<b>Hospital</b>
A	02/26/18	10/03/15	New England Natural Bakers	Elliott Hospital
B	05/29/18	02/28/18	Seggiano USA	Elliott Hospital

6. In addition to the false statements asserted in the demand letters referenced in paragraphs 2 through 5 above, MASSE provided to the businesses and their insurance carriers fraudulent hospital medical records, fraudulent invoices from the hospitals and an ambulance company, and other false information regarding the fictitious illnesses and fictitious medical care.

7. Relying on the fraudulent demand letters, medical records, invoices, and other false information regarding the fictitious illnesses and medical services, the insurance carriers issued insurance settlement checks totaling more than \$206,000 to MASSE and her adult children, who were unwitting participants in the scheme to defraud.

**COUNT ONE**  
**Mail Fraud – 18 U.S.C. § 1341**

8. The allegations of paragraphs 1 through 7 of this Information are re-alleged and incorporated as if set forth in full herein.

9. From in and around August 2015 to in and around May 2018, in the District of New Hampshire, and elsewhere, the defendant,

JACQUELINE MASSE,


knowingly devised and intended to devise a scheme and artifice to defraud and to obtain money by means of false and fraudulent pretenses, representations and promises, and for the purpose of executing the scheme and attempting to do so, caused mail matter to be delivered by the United States Postal Service according to the directions thereon. In that, MASSE caused insurance settlement checks to be delivered by the United States Postal Service to MASSE's home in Hampton, New Hampshire, and to addresses associated with K.M.-1, K.M.-2, and K.M.-3.

All in violation of Title 18, United States Code, Section, 1341.

DATED: September 30, 2019

SCOTT W. MURRAY  
United States Attorney

By:



Robert M. Kinsella  
Assistant United States Attorney