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CLERK OF DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
DALLAS

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

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DEPUTY CLERK

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UNITED STATES OF AMERICA

v.

THEADORA ROSS (01)  
MALVA R. DELLEY (02)

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§

**3-11 CR-011-N**

No.

**TO BE FILED UNDER SEAL**

**INDICTMENT**

The Grand Jury Charges:

**Introduction**

At all times material to the indictment:

1. The Crime Stoppers program is a nation-wide program that offers cash rewards for information from anonymous callers that leads to the arrest and indictment of criminals. The Crime Stoppers program guarantees the anonymity of callers to promote a positive atmosphere without the prospect of retribution.

2. The Dallas Crime Stoppers office is funded by the North Texas Crime Commission ("NTCC"), fines levied by the Dallas and Collin County courts, private donations, and fund raising. The NTCC is a non-profit organization that is run by a civilian board of directors.

3. The Dallas Crime Stoppers office is staffed by officers of the Dallas Police Department ("DPD") and deputies of the Dallas County Sheriff's Office ("DSO").

During the time period relevant to this indictment, the Crime Stoppers program was headed by DPD Senior Corporal **Theadora Ross**. **Ross** was a 26-year police veteran who worked at the Dallas Crime Stoppers office from 2003 to May 2010.

4. **Ross** and other law enforcement officers assigned to the Dallas Crime Stoppers office determined which tips were eligible for a cash reward based on: 1) the quality of the information provided by the tipster; and 2) whether the ultimate arrest or indictment of the subject of the tip was actually related to the tip. **Ross** selected the tips that would be presented to the NTCC for approval of a cash reward.

5. A person that provided information (a “tipster”) about a crime, an individual suspected of committing a crime, or an individual that was wanted by law enforcement to Crime Stoppers would call the Crime Stoppers office and provide his or her information to law enforcement officers working in the Crime Stoppers office. Upon receipt of a tipster’s information, the law enforcement officer would give a tip number to the tipster. The tipster periodically and regularly called the Crime Stoppers office to find out if his or her information resulted in a reward.

6. Tipster information was maintained on a database called TIPSOFT. When a tip led to the arrest of a suspect, **Ross** would present limited eligible tipster information from TIPSOFT to the NTCC and recommend that the tip be approved for a cash reward. Limited information about the tip was provided to the NTCC in order to protect the anonymity of the tipster.

7. Once approval for cash reward was given by the NTCC, the anonymous tipster could call the Crime Stoppers office with his or her previously assigned tip number and would be provided a tip number and code word from Crime Stoppers.

8. Tip numbers and code words for tips, which had been submitted and approved for cash rewards were emailed to JP Morgan Chase Bank.

9. The anonymous tipster then presented the tip number and code word in person at Chase Bank to collect his or her reward.

**Count One**  
**Conspiracy to Commit Wire Fraud**  
**(Violation of 18 U.S.C. § 1349 (18 U.S.C. § 1343))**

1. The Grand Jury re-alleges and incorporates by reference all of the allegations set out in the Introduction of this Indictment as though fully set forth herein.

**The Conspiracy and its Objects**

2. Beginning in or around February 2005, the exact date being unknown to the Grand Jury, and continuing thereafter until at least in or around May 2010, in the Dallas Division of the Northern District of Texas, and elsewhere, defendants **Theadora Ross** and **Malva R. Delley** did knowingly and willfully combine, conspire, confederate, and agree with others unknown to the Grand Jury, to commit the offense of wire fraud, in violation of 18 U.S.C. § 1343, by transmitting or causing to be transmitted in interstate commerce, by means of wire and radio communications, certain writings, signs, signals, and sounds, for the purpose of executing and attempting to execute a scheme and artifice to defraud and to obtain money and property from the North Texas Crime Commission, by means of materially false and fraudulent pretenses, representations, and promises.

**Scheme and Artifice to Defraud**

3. The manner and means by which the conspiracy was sought to be accomplished included, among other things, the following:

a) It was part of this conspiracy and joint scheme and artifice to defraud that **Ross** would prepare the list of Crime Stoppers cash rewards to be paid out each month

and would email or cause to be emailed to JP Morgan Chase Bank the Crime Stoppers cash reward list, or award payment report, for a given month. These lists would include tip numbers and code words for tips that had been tampered with or altered by **Ross** (hereinafter “bogus tips” or “bogus tip information”) together with legitimate cash reward tip numbers and code words.

b) It was part of this conspiracy and joint scheme and artifice to defraud that at the direction of **Ross**, **Delley** collected Crime Stoppers cash rewards to which she was not entitled. **Ross** provided **Delley** with bogus tip information, including tip numbers and code words necessary to collect the Crime Stoppers cash rewards.

c) It was part of this conspiracy and joint scheme and artifice to defraud that **Delley** would present the bogus tip numbers and code words to the bank teller at JP Morgan Chase Bank in order to collect the Crime Stoppers cash rewards, which were under the control of JP Morgan Chase Bank.

4. It was further part of the joint scheme and artifice to defraud that:

a) After **Delley** would collect the Crime Stoppers cash rewards from JP Morgan Chase Bank, she would divide the cash, per **Ross**’s instructions, and deliver **Ross**’s share of the illegally-obtained money by either directly depositing cash into **Ross**’s Bank of America bank account or by giving cash directly to **Ross**.

(b) During the period from in or around February 2005 through May 2010, the conspirators collected at least \$250,000 in cash rewards for bogus tips, resulting in a loss to the North Texas Crime Commission.

All in violation of 18 U.S.C. § 1349 (18 U.S.C. § 1343).

**Forfeiture Notice**  
(18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c))

Upon conviction for the offense alleged in Count One of this Indictment, the defendants, **Theadora Ross** and **Malva R. Delley**, shall forfeit to the United States any property, real or personal, constituting or derived from proceeds traceable to the offense pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c):

The above-referenced property subject to forfeiture includes, but is not limited to, the following:

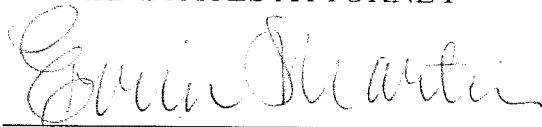
1. The total amount of proceeds obtained, directly or indirectly, as a result of the offenses which is at least \$250,000.

A TRUE BILL



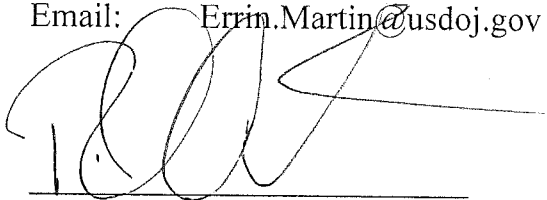
FOREPERSON

JAMES T. JACKS  
UNITED STATES ATTORNEY



ERRIN MARTIN

Assistant United States Attorney  
Texas State Bar No. 24032572  
1100 Commerce Street, Third Floor  
Dallas, Texas 75242-1699  
Telephone: 214.659.8600  
Facsimile: 214.767.4104  
Email: [Errin.Martin@usdoj.gov](mailto:Errin.Martin@usdoj.gov)



RICK CALVERT

Assistant United States Attorney  
Texas State Bar No. 03669700  
1100 Commerce Street, Third Floor  
Dallas, Texas 75242-1699  
Telephone: 214.659.8600  
Facsimile: 214.767.4104  
Email: [Rick.Calvert@usdoj.gov](mailto:Rick.Calvert@usdoj.gov)