

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	CRIMINAL NO. 12-
v.	:	DATE FILED: _____
RAFAEL HENRIQUEZ POLANCO	:	VIOLATIONS:
a/k/a “Jose Luis Eulerio”		18 U.S.C. § 286 (conspiracy to
a/k/a “Jose Millan”	:	defraud the government with respect to
a/k/a “Saul Morales Jurado”		claims – 1 count)
a/k/a “Wilberto Perez”	:	18 U.S.C. § 1542 (passport fraud -
a/k/a “Daniel Sanchez”		1 count)
YANIRA LOPEZ	:	18 U.S.C. § 1028A (aggravated identity
a/k/a “Leslie Serrano”		theft - 1 count)
a/k/a “Giol Morales Jurado”	:	18 U.S.C. § 1546 (presentation of
		immigration application containing a
		false statement - 2 counts)
		18 U.S.C. § 1343 (wire fraud - 1 count)
		18 U.S.C. § 2 (aiding and abetting)
		Notice of Forfeiture

INFORMATION

COUNT ONE

THE UNITED STATES ATTORNEY CHARGES THAT:

At all times material to this information:

1. Defendant RAFAEL HENRIQUEZ POLANCO, a citizen of the Dominican Republic, was an illegal alien residing in Chester Springs, Pennsylvania.
2. Defendant YANIRA LOPEZ was a resident of Chester Springs, Pennsylvania. Defendant LOPEZ was married to defendant RAFAEL HENRIQUEZ POLANCO.
3. The Internal Revenue Service (“IRS”) was an agency of the United States Department of the Treasury, responsible for administering and enforcing the tax laws of the United States.

4. Federal individual income tax returns Forms 1040, 1040A, and 1040EZ required the taxpayer to provide his/her social security number (“SSN”) on the tax return. The IRS used the SSNs provided on tax returns in order to track and record for each particular tax year who has filed an income tax return, and who has claimed or received a tax refund.

5. The Commonwealth of Puerto Rico was a territory of the United States and an independent taxation authority.

6. Natural born citizens of the Commonwealth of Puerto Rico were, upon birth, automatically granted United States citizenship.

7. Citizens of the Commonwealth of Puerto Rico were, upon application, issued Social Security numbers by the Social Security Administration.

8. The tax laws of the United States generally did not require citizens of the Commonwealth of Puerto Rico who reside in Puerto Rico to file a U.S. individual income tax return when their income was derived entirely from employment or other sources in Puerto Rico. Accordingly, citizens of the Commonwealth of Puerto Rico who lived and worked exclusively in Puerto Rico were not obligated under federal law to file U.S. individual income tax returns.

9. From in or about January 2008 through in or about September 2011, in the Eastern District of Pennsylvania, and elsewhere, defendants

RAFAEL HENRIQUEZ POLANCO,
a/k/a “Jose Luis Eulerio,”
a/k/a “Jose Millan,”
a/k/a “Saul Morales Jurado,”
a/k/a “Wilberto Perez,”
a/k/a “Daniel Sanchez,” and
YANIRA LOPEZ,
a/k/a “Leslie Serrano,”
a/k/a “Giol Morales Jurado”

conspired and agreed, together and with others known and unknown to the United States Attorney, to knowingly defraud the United States by obtaining undeserved federal income tax refunds by presenting and causing to be presented false, fictitious, and fraudulent claims, that is, fraudulent federal individual income tax returns to the IRS and fraudulently obtained tax refund checks to the United States Department of the Treasury.

MANNER AND MEANS

It was part of the conspiracy that:

10. From in or about January 2008 through in or about September 2011, defendants RAFAEL HENRIQUEZ POLANCO and YANIRA LOPEZ, and others known and unknown to the United States Attorney, engaged in a scheme to obtain the payment of false, fictitious, and fraudulent claims through the cashing of fraudulently procured tax refunds.

11. Defendants RAFAEL HENRIQUEZ POLANCO and YANIRA LOPEZ recognized that they could falsely and fraudulently obtain tax refunds by filing false, fictitious, and fraudulent income tax returns using the SSNs of United States citizens, including Puerto Rican residents. Defendants POLANCO and LOPEZ further recognized that because Puerto Rican residents do not typically file individual tax returns, the IRS was less likely to be alerted to the scheme by the receipt of two tax returns using the same Puerto Rican SSN.

12. In order to implement the scheme, defendants RAFAEL HENRIQUEZ POLANCO and YANIRA LOPEZ obtained Puerto Rican identities, including names, dates of birth, and Puerto Rican SSNs.

13. In order to implement the scheme, defendants RAFAEL HENRIQUEZ POLANCO and YANIRA LOPEZ obtained the names, dates of birth, and SSNs of patients of Community Hospital in Chester, Pennsylvania and Crozer-Chester Medical Center in Upland, Pennsylvania, by paying employees of the hospitals to steal confidential medical forms.

14. Using the stolen identities, defendants RAFAEL HENRIQUEZ POLANCO and YANIRA LOPEZ filed with the IRS false, fictitious, and fraudulent IRS Forms 1040, 1040A, and 1040EZ, claiming that the individual identified on the tax return was entitled to a tax refund. In support of each return, defendants POLANCO and LOPEZ submitted a false, fictitious, and fraudulent Form W-2 (Wage and Tax Statement).

15. Defendants RAFAEL HENRIQUEZ POLANCO and YANIRA LOPEZ prepared the false, fictitious, and fraudulent IRS Forms 1040, 1040A, and 1040EZ in such a way as to make it appear that the filer resided at an address located in Chester, Pennsylvania, or Philadelphia, Pennsylvania, when in fact the address listed was controlled by defendants POLANCO and LOPEZ.

16. As a result of the false, fictitious, and fraudulent IRS Forms 1040, 1040A, and 1040EZ being filed, defendants RAFAEL HENRIQUEZ POLANCO and YANIRA LOPEZ fraudulently caused the United States Department of the Treasury to make direct deposits of tax refund checks into bank accounts that the defendants controlled at Susquehanna Bank f/k/a Graystone Bank in West Chester, Pennsylvania, and Bank of America in Brookhaven, Pennsylvania.

17. As a result of the false, fictitious, and fraudulent IRS Forms 1040, 1040A, and 1040EZ being filed, defendants RAFAEL HENRIQUEZ POLANCO and YANIRA LOPEZ caused the United States Department of the Treasury to mail false tax refund checks to addresses that defendants POLANCO and LOPEZ controlled in Chester, Pennsylvania and Philadelphia, Pennsylvania. Some of these addresses were marijuana grow homes utilized by defendants POLANCO and LOPEZ and others known to the United States Attorney.

18. Using false identities, defendants RAFAEL HENRIQUEZ POLANCO and YANIRA LOPEZ opened several bank accounts at Susquehanna Bank f/k/a Graystone Bank in West Chester, Pennsylvania, Bank of America in Brookhaven, Pennsylvania, and Wells Fargo Bank in Exton, Pennsylvania. Defendants POLANCO and LOPEZ deposited fraudulently procured false tax refund checks into those accounts.

19. In a continuing effort to shield scrutiny by law enforcement, defendants RAFAEL HENRIQUEZ POLANCO and YANIRA LOPEZ paid certain conspirators known to the United States Attorney to open bank accounts using false identities, and provided those conspirators with false identification documents, including Pennsylvania driver's licenses. Defendant LOPEZ, a former bank teller, utilized her knowledge of bank procedures to further this aspect of the scheme.

20. Defendants RAFAEL HENRIQUEZ POLANCO and YANIRA LOPEZ forged the signatures of the payees named on the false tax refund checks that they fraudulently procured.

OVERT ACTS

In furtherance of the conspiracy, defendants RAFAEL HENRIQUEZ POLANCO and YANIRA LOPEZ, and others known and unknown to the United States Attorney, committed the following overt acts in the Eastern District of Pennsylvania and elsewhere, specifically, they prepared and caused to be prepared, filed and caused to be filed, and aided and abetted the preparing and filing of, federal income tax returns, in the names of the individuals listed below by initials, for income tax refunds for the amounts listed below, and received by the IRS on the dates listed below, with knowledge that such claims were false, fictitious, or fraudulent, each return filing being a separate overt act:

Overt Act Number	Date Return Received	Name on Return	Refund Claimed
1	4/24/2010	L.L.R.	\$ 10,919.00
2	4/24/2010	M.P.	\$ 11,425.00
3	2/20/2011	D.L.D.	\$ 11,528.00
4	4/24/2010	D.M.Z.	\$ 12,528.00
5	4/18/2010	A.A.	\$ 10,737.00
6	4/25/2010	B.L.D.	\$ 12,344.00
7	6/26/2010	N.A.S.	\$ 15,234.00
8	6/19/2010	M.P.S.	\$ 11,095.00
9	4/18/2010	J.B.	\$ 10,839.00
10	4/24/2010	N.C.	\$ 11,603.00
11	4/18/2010	T.J.M.	\$ 11,722.00
12	5/15/2010	C.M.P.	\$ 15,358.00
13	4/24/2010	A.M.S.E.	\$ 13,601.00
14	4/18/2010	C.M.G.R.	\$ 11,455.00
15	4/18/2010	E.D.J.	\$ 12,367.00
16	4/25/2010	A.A.A.	\$ 13,714.00
17	4/18/2010	W.M.P.	\$ 11,437.00
18	4/18/2010	E.M.C.	\$ 12,809.00
19	4/19/2010	R.R.	\$ 9,995.00
20	4/17/2010	C.B.	\$ 11,539.00
21	4/25/2010	A.A.R.	\$ 8,297.00
22	4/25/2010	J.F.A.	\$ 8,116.00

23	4/24/2010	S.D.R.L.	\$ 9,097.00
24	4/15/2010	L.P.D.	\$ 12,435.00
25	4/17/2010	L.E.C.B.	\$ 11,097.00
26	9/30/2010	F.J.H.H.	\$ 11,144.00
27	4/23/2011	C.L.	\$ 9,016.00
28	4/23/2011	J.V.R.	\$ 9,180.00
29	4/23/2011	C.G.	\$ 9,431.00
30	4/17/2011	M.E.	\$ 9,394.00
31	4/23/2011	H.B.	\$ 9,277.00
32	3/20/2011	M.P.	\$ 14,762.00
33	5/7/2011	D.J.	\$ 9,348.00
34	2/20/2011	D.D.	\$ 14,212.00
35	4/17/2011	A.J.	\$ 9,322.00
36	4/16/2011	L.S.	\$ 9,377.00
37	4/23/2011	K.R.	\$ 9,427.00
38	2/3/2011	A.A.	\$ 15,242.00
39	2/13/2011	S.T.	\$ 14,519.00
40	2/19/2011	B.L.D.	\$ 13,526.00
41	4/23/2011	P.W.	\$ 9,267.00
42	4/18/2011	R.C.	\$ 9,485.00
43	5/7/2011	H.A.C.	\$ 14,566.00
44	2/13/2011	P.W.	\$ 14,139.00
45	4/15/2011	V.W.	\$ 9,317.00
46	4/23/2011	M.S.	\$ 9,362.00
47	4/16/2011	L.R.	\$ 9,377.00
48	4/23/2011	B.K.	\$ 9,629.00
49	2/13/2011	E.G.	\$ 14,378.00
50	2/19/2011	M.C.	\$ 14,253.00
51	4/23/2011	L.D.	\$ 9,427.00
52	2/20/2011	J.K.	\$ 14,289.00
53	2/19/2011	N.A.S.	\$ 14,212.00
54	4/16/2011	J.G.	\$ 9,387.00
55	4/17/2011	J.C.	\$ 9,432.00
56	2/26/2011	M.P.S.	\$ 13,761.00
57	4/15/2011	V.D.C.	\$ 9,361.00
58	4/17/2011	E.D.H.	\$ 9,392.00
59	4/15/2011	R.M.	\$ 9,362.00
60	2/13/2011	A.K.	\$ 14,166.00
61	2/13/2011	D.J.	\$ 14,185.00
62	2/20/2011	M.L.	\$ 14,242.00
63	4/23/2011	S.J.M.	\$ 9,362.00
64	4/18/2011	T.T.	\$ 9,377.00

65	4/23/2011	S.K.	\$ 9,380.00
66	5/7/2011	K.M.	\$ 9,421.00
67	4/18/2011	D.J.	\$ 9,622.00
68	2/13/2011	J.P.	\$ 13,929.00
69	4/24/2011	L.R.S.	\$ 9,252.00
70	2/20/2011	C.D.	\$ 14,349.00
71	4/15/2011	M.W.	\$ 9,440.00
72	4/23/2011	M.P.	\$ 9,427.00
73	4/17/2011	D.D.	\$ 9,084.00
74	2/20/2011	V.J.G.	\$ 14,286.00
75	4/17/2011	A.S.	\$ 9,391.00
76	4/15/2011	K.K.A.	\$ 13,648.00
77	2/20/2011	T.M.	\$ 14,049.00
78	4/23/2011	W.K.D.	\$ 9,376.00
79	2/20/2011	J.B.	\$ 14,191.00
80	4/17/2011	G.J.	\$ 9,782.00
81	4/15/2011	K.H.	\$ 9,483.00
82	5/7/2011	C.S.	\$ 9,293.00
83	4/17/2011	D.W.	\$ 9,521.00
84	4/16/2011	L.R.	\$ 9,395.00
85	2/20/2011	L.M.	\$ 14,076.00
86	2/19/2011	J.M.	\$ 14,134.00
87	2/20/2011	T.K.B.	\$ 9,334.00
88	2/20/2011	V.C.H.	\$ 14,119.00
89	4/16/2011	L.B.	\$ 9,149.00
90	4/30/2011	R.J.	\$ 9,308.00
91	4/16/2011	C.B.	\$ 9,396.00
92	2/13/2011	B.D.	\$ 14,194.00
93	4/18/2011	J.B.	\$ 13,846.00
94	2/13/2011	J.R.	\$ 14,119.00
95	2/19/2011	J.L.S.	\$ 14,653.00
96	2/26/2011	G.H.	\$ 14,280.00
97	2/20/2011	P.W.	\$ 14,150.00
98	4/16/2011	M.D.	\$ 9,031.00
99	2/13/2011	L.M.G.	\$ 14,552.00
100	4/23/2011	E.G.	\$ 9,059.00
101	2/17/2011	V.C.	\$ 9,314.00
102	2/13/2011	M.W.	\$ 14,117.00
103	3/12/2011	D.E.	\$ 14,296.00
104	2/19/2011	R.C.	\$ 14,540.00
105	2/20/2011	S.S.	\$ 14,306.00
106	5/7/2011	W.A.	\$ 9,263.00

107	5/7/2011	K.M.	\$ 9,518.00
108	4/16/2011	J.W.	\$ 9,439.00
109	4/15/2011	M.H.	\$ 9,219.00
110	5/7/2011	J.B.	\$ 9,378.00
111	2/20/2011	J.L.	\$ 14,117.00
112	2/19/2011	A.W.	\$ 14,621.00
113	2/13/2011	J.B.	\$ 14,141.00
114	5/7/2011	L.S.	\$ 9,451.00
115	5/7/2011	L.M.	\$ 9,262.00
116	4/24/2011	N.C.	\$ 5,719.00
117	2/20/2011	A.G.J.	\$ 14,329.00
118	2/19/2011	A.J.M.	\$ 14,165.00
119	2/19/2011	T.J.M.	\$ 13,725.00
120	4/23/2011	V.W.J.	\$ 9,245.00
121	2/19/2011	S.L.	\$ 14,159.00
122	4/2/2011	L.G.R.	\$ 13,905.00
123	2/19/2011	C.M.P.	\$ 14,246.00
124	4/23/2011	D.Y.T.	\$ 9,168.00
125	5/7/2011	T.K.	\$ 9,151.00
126	4/15/2011	B.O.B.	\$ 9,547.00
127	4/23/2011	S.F.	\$ 9,244.00
128	3/26/2011	A.Q.M.	\$ 9,402.00
129	3/26/2011	T.R.D.	\$ 9,314.00
130	5/7/2011	J.P.	\$ 14,268.00
131	4/25/2011	A.A.A.	\$ 13,669.00
132	6/11/2011	E.G.V.	\$ 13,955.00
133	5/7/2011	S.F.S.	\$ 13,633.00
134	4/18/2011	W.M.P.	\$ 14,222.00
135	2/19/2011	J.I.M.	\$ 13,896.00
136	5/7/2011	L.R.C.	\$ 13,822.00
137	4/15/2011	L.P.	\$ 9,592.00
138	6/11/2011	J.S.C.	\$ 13,688.00
139	3/26/2011	A.C.A.	\$ 9,546.00
140	4/15/2011	T.L.R.	\$ 9,288.00
141	2/19/2011	J.M.	\$ 14,388.00
142	4/15/2011	L.R.M.B.	\$ 9,186.00
143	5/7/2011	R.C.P.	\$ 13,654.00
144	3/26/2011	Y.S.R.	\$ 9,629.00
TOTAL			\$ 1,710,344.00

145. From in or about May 21, 2009 to and including on or about September 16, 2011, on or about the dates set forth below, defendants RAFAEL HENRIQUEZ POLANCO and YANIRA LOPEZ knowingly negotiated or caused to be negotiated false, fictitious, and fraudulent claims, to wit, federal tax refund checks issued by the United States Department of the Treasury, in the amount of \$253,057.79, that they then and there well knew and believed to be issued as a result of false, fictitious, and fraudulent federal individual tax returns, as follows:

	Date Check Negotiated	Amount of Treasury Check
A	5/21/2010	\$ 6,390.00
B	5/25/2010	\$ 5,483.96
C	8/27/2010	\$ 12,344.00
D	10/27/2010	\$ 6,496.00
E	1/31/2011	\$ 13,987.19
F	3/23/2011	\$ 14,588.00
G	3/24/2011	\$ 13,776.00
H	4/4/2011	\$ 11,128.75
I	7/18/2011	\$ 4,411.22
J	7/21/2011	\$ 14,384.00
K	7/21/2011	\$ 10,079.33
L	7/25/2011	\$ 14,179.00
M	8/1/2011	\$ 14,462.00
N	8/8/2011	\$ 12,945.00
O	8/18/2011	\$ 14,444.00
P	8/19/2011	\$ 7,875.00
Q	8/19/2011	\$ 13,688.00
R	9/8/2011	\$ 14,441.00
S	9/12/2011	\$ 14,628.00

	Date Check Negotiated	Amount of Treasury Check
T	9/14/2011	\$ 14,530.00
U	9/16/2011	\$ 9,356.09
V	9/16/2011	\$ 9,441.25
TOTAL		\$ 253,057.79

All in violation of Title 18, United States Code, Section 286.

COUNT TWO

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

On or about March 31, 2009, in the Eastern District of Pennsylvania, defendants

**RAFAEL HENRIQUEZ POLANCO,
a/k/a “Jose Luis Eulerio,”
a/k/a “Jose Millan,”
a/k/a “Saul Morales Jurado,”
a/k/a “Wilberto Perez,”
a/k/a “Daniel Sanchez,” and
YANIRA LOPEZ,
a/k/a “Leslie Serrano,”
a/k/a “Giol Morales Jurado”**

knowingly and willfully made, and aided and abetting the making of, false statements in an application for a United States passport; with intent to induce and secure for defendant RAFAEL HENRIQUEZ POLANCO’s use, the issuance of a passport under the authority of the United States, contrary to the laws regulating the issuance of passports and the rules prescribed pursuant to such laws, that is, defendants RAFAEL HENRIQUEZ POLANCO and YANIRA LOPEZ stated that defendant POLANCO’s name was “D.E.S.,” that he was born in Brooklyn, New York, and was, therefore, a United States citizen, and that his Social Security Number ended in 7118, which statements defendants POLANCO and LOPEZ knew to be false.

In violation of Title 18, United States Code, Sections 1542 and 2.

COUNT THREE

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

On or about March 31, 2009, in the Eastern District of Pennsylvania, defendants

**RAFAEL HENRIQUEZ POLANCO,
a/k/a “Jose Luis Eulerio,”
a/k/a “Jose Millan,”
a/k/a “Saul Morales Jurado,”
a/k/a “Wilberto Perez,”
a/k/a “Daniel Sanchez,” and
YANIRA LOPEZ,
a/k/a “Leslie Serrano,”
a/k/a “Giol Morales Jurado”**

knowingly and without lawful authority possessed and used, and aided and abetted the possession and use of, a means of identification of another person, that is, the name, date of birth, and social security number of D.E.S. during and in relation to a passport fraud.

In violation of Title 18, United States Code, Sections 1028A(a)(1) and (c)(7),
and 2.

COUNT FOUR

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

On or about December 12, 2008, in the Eastern District of Pennsylvania, defendant

**RAFAEL HENRIQUEZ POLANCO,
a/k/a “Jose Luis Eulerio,”
a/k/a “Jose Millan,”
a/k/a “Saul Morales Jurado,”
a/k/a “Wilberto Perez,”
a/k/a “Daniel Sanchez”**

knowingly made under oath a false material statement in an application required by the immigration laws, that is, Form I-485, Application to Register Permanent Residence or Adjust Status, that the defendant had lawfully entered the United States pursuant to a B-1/B-2 visa, when in fact, as the defendant knew, this statement was false.

In violation of Title 18, United States Code, Section 1546(a).

COUNT FIVE

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

On or about December 10, 2008, in the Eastern District of Pennsylvania,
defendant

**YANIRA LOPEZ,
a/k/a “Leslie Serrano,”
a/k/a “Giol Morales Jurado”**

knowingly made under oath a false material statement in an application required by the immigration laws, that is, Form I-130, Petition for Alien Relative, that the defendant’s husband, Rafael Henriquez Polanco, had lawfully entered the United States pursuant to B-1/B-2 visa, when in fact, as the defendant knew, this statement was false.

In violation of Title 18, United States Code, Section 1546(a).

COUNT SIX

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

At all times material to this superseding indictment:

1. The Federal and State Unemployment Insurance system, created by the Social Security Act of 1935, was designed to provide unemployment insurance benefits, commonly called unemployment compensation, to persons out of work through no fault of their own. To be insured under the system, an unemployment compensation claimant must have worked for an employer who is covered by the unemployment compensation law.

2. In general, claimants are eligible for unemployment compensation benefits if they: (a) are able and available for work; (b) have earned enough wages and worked enough weeks to qualify; (c) have worked for an employer covered by the unemployment compensation system within a specified period of time prior to the filing of their unemployment compensation claims; and (d) are unemployed through no fault of their own.

3. In general, employers are covered by the unemployment compensation law if they: (a) submit documentation to the unemployment compensation system accurately identifying, among other things, the principal business activity, the business owners, and the business employees and the wages they earned; and (b) pay unemployment compensation taxes to the Pennsylvania State Unemployment Compensation Fund. These taxes are based, in part, upon a percentage of the wages paid to the employees.

4. Claimants deemed eligible receive unemployment compensation benefits for up to 26 weeks during the 52-week period beginning with the date of their unemployment compensation claim, and benefits terminate once a worker returns to full-time employment.

Federal extended unemployment benefits for additional weeks may also be available.

5. Claimants are required to report all work and gross earnings for which they have been paid or will be paid for the week in which they are earned, regardless of when they are paid. After filing an initial claim for benefits, claimants are required to file biweekly claims in which they are required to report all work and gross earnings for each week for which they are claiming benefits. When a worker works part-time, she may still receive a partial benefit. A partial benefit amount is calculated for each applying worker, and only wages above that amount reduce the weekly benefit. Failure to report all work and gross earnings can disqualify a claimant from receiving benefits for the claimed week or weeks.

THE SCHEME

6. From on or about November 3, 2008 to on or about May 8, 2010, defendant

**YANIRA LOPEZ,
a/k/a “Leslie Serrano,”
a/k/a “Giol Morales Jurado”**

devised and intended to devise a scheme to defraud the Commonwealth of Pennsylvania, State Treasury Department, Bureau of Unemployment Compensation Disbursements, Pennsylvania Department of Labor and Industry, and the Pennsylvania Unemployment Compensation Fund and to obtain money and property of the Commonwealth by means of false and fraudulent pretenses, representations and promises.

MANNER AND MEANS

It was part of the scheme that:

7. On or about November 3, 2008, defendant YANIRA LOPEZ electronically filed an application for unemployment benefits from the Commonwealth of Pennsylvania by accessing an Internet website established by the Pennsylvania Department of Labor and Industry,

www.uc.pa.gov. As part of her application, defendant YANIRA LOPEZ stated that she was not currently employed.

8. In order to continue to collect unemployment compensation, defendant YANIRA LOPEZ on a weekly basis from on or about November 3, 2008 to and including on or about May 8, 2010, accessed the Internet website www.uc.pa.gov, where she completed a form in which she stated that she was not currently employed.

9. In fact, from on or about May 23, 2008 through on or about February 5, 2011, defendant YANIRA LOPEZ was employed full-time at Brandywine Maintenance, Inc. in Spring City, Pennsylvania. Defendant LOPEZ was employed under the alias “Leslie Serrano.”

9. As a result of defendant YANIRA LOPEZ’s statements, a weekly benefit amount was established for her totaling approximately \$581.00 per week.

10. On or about November 3, 2008, in the Eastern District of Pennsylvania and elsewhere, defendant

**YANIRA LOPEZ,
a/k/a “Leslie Serrano,”
a/k/a “Giol Morales Jurado”**

for the purpose of executing the scheme described above, and attempting to do so, and aiding and abetting its execution, caused to be transmitted by means of wire communications in interstate commerce signals and sounds, that is, the electronic submission over the Internet of an application for unemployment benefits from the Commonwealth of Pennsylvania.

All in violation of Title 18, United States Code, Section 1343.

NOTICE OF FORFEITURE

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

1. As a result of the violations of Title 18, United States Code, Section 1343 set forth in this information, defendant

**YANIRA LOPEZ,
a/k/a “Leslie Serrano,”
a/k/a “Giol Morales Jurado”**

shall forfeit to the United States of America

(a) any property used or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such offenses, including any computers; and

(b) any property constituting, or derived from, proceeds obtained directly or indirectly from the commission of such offenses.

2. If any of the property described above, as a result of any actor omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred to, sold to, or deposited with a third party;
- c. has been placed beyond the jurisdiction of this Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intention of the United States, pursuant to 21 U.S.C. § 853(p), to seek forfeiture of any other property of the defendant up to the value of the property subject to forfeiture.

All pursuant to Title 18, United States Code, Sections 981(a)(1)(C), Title 28,
United States Code, Section 2461(c).

ZANE DAVID MEMEGER
UNITED STATES ATTORNEY