

MANNER AND MEANS

It was part of the scheme that:

3. From at least early 1998 through January 2005, JUDITH CAMPELLONE, without knowledge or authority of her employers at Pyramid, wrote checks on Pyramid's account to herself or to credit card companies in payment of her personal credit card bills. The embezzled checks, which ranged in amounts from several hundred dollars to over \$11,000, totalled over \$1,459,000. CAMPELLONE issued over \$450,000 in embezzled checks to herself, and used other embezzled funds to pay for credit card purchases that included, among other items, over \$130,000 in sports and entertainment tickets (including to the 2005 Super Bowl, Phillies, Flyers, Phantoms, and Mets games), over \$150,000 in cash advances, over \$100,000 in hotel, limousine, cruise, airline, and car rental payments for travel to, among other places, St. Maarten, Las Vegas, Kiawah Island, Miami, Ft. Lauderdale, Tampa, Jacksonville, New York, Washington D.C., and Atlantic City, and countless purchases of meals, clothing, furniture, jewelry, computer equipment and other items.

4. JUDITH CAMPELLONE, without knowledge or authority of her employers at Pyramid, used the signature stamps of Pyramid's authorized check writers to sign the checks with which she embezzled the funds described in paragraph 3, above.

5. JUDITH CAMPELLONE hid her embezzlement from her employers at Pyramid and from Pyramid's accountant by disposing of the embezzled checks enclosed with Pyramid's monthly bank statements and by making entries in Pyramid's computer accounting system representing that the embezzled checks had been issued to Pyramid's suppliers and vendors.

6. On or about April 4, 2004, in Philadelphia, in the Eastern District of Pennsylvania and elsewhere, defendant

JUDITH CAMPELLONE,

for the purpose of executing the scheme described above, and attempting to do so, knowingly caused to be delivered by mail, according to the directions thereon, a \$6,472.00 check drawn on Pyramid Sheet Metal Company, Inc. to American Express, P.O. Box 1270, Newark, NJ, 07101-1270, in payment of her American Express bill.

In violation of Title 18, United States Code, Section 1341.

PATRICK L. MEEHAN
United States Attorney