

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

UNITED STATES OF AMERICA : **CRIMINAL NO.** _____
v. : **DATE FILED:** 9/21/2006
DAVID SNYDER : **VIOLATIONS:**
: **18 U.S.C. § 1341 (mail fraud - 1 count)**

INFORMATION

COUNT ONE

THE UNITED STATES ATTORNEY CHARGES THAT:

At all times material to this information:

THE DEFENDANT

1. Defendant DAVID SNYDER was a licensed insurance agent who worked for D&S Insurance located in Bensalem, Pennsylvania.
2. Florence James and Shea Drulyk, charged elsewhere, were paramedics who worked for American Para Professional Services (APPS), a medical services company located in Collingdale, Pennsylvania. As part of their employment, they conducted medical screenings for life insurance companies as part of the application process for term life insurance policies. They visited applicants at home or work, obtained vital signs, documented medical history and other personal information, and drew a blood sample.
3. Robert Mitchell, charged elsewhere, was a 40-year old, healthy, non-smoker, who lived and worked in Philadelphia.

THE VICTIMS

4. Insurance companies issue life insurance policies to individuals based on numerous criteria, including but not limited to age, physical condition, and whether the individual is a smoker.

5. Insurance companies routinely require individuals seeking life insurance to submit to a medical examination to assist their determination of (1) whether the individual will be issued a policy, and if so, (2) how much of a premium will be charged for the policy, and (3) the amount of life insurance coverage under the policy.

6. Medical screeners are employed by life insurance companies to perform the medical examination, which includes drawing blood from the policy applicant. The blood is mailed to a laboratory for analysis and the analysis results are mailed to the relevant insurance company for evaluation and use in processing the life insurance application.

THE SCHEME

7. From in or about April 2000 to in or about October 2002, defendant DAVID SNYDER and Robert Mitchell, Florence James and Shea Drulyk devised and intended to devise a scheme to defraud various life insurance companies and to obtain money and property by means of false and fraudulent pretenses, representations and promises.

MANNER AND MEANS

It was part of the scheme that:

8. Robert Mitchell received payment from various individuals who desired to obtain insurance policies for family members who were elderly, in poor physical condition or smokers.

9. Robert Mitchell posed as the policy applicant at medical examinations,

where he provided blood, forged documents and falsely represented himself as the actual individual seeking to obtain life insurance.

10. Unbeknownst to their employer APPS, Florence James and Shea Drulyk received payment from Robert Mitchell to falsely document the medical condition of applicants during the application process for life insurance policies.

11. Defendant DAVID SNYDER, in his capacity as an insurance agent, knowingly mailed to various life insurance companies life insurance policy applications. The approval of these applications was dependent upon fraudulent medical examinations.

12. Defendant DAVID SNYDER received commissions from the life insurance companies for the fraudulent policies that were approved because the life insurance companies believed that the information contained in the applications and reports of the medical examinations was accurate.

13. On various occasions between approximately April 2000 and October 2002, defendant DAVID SNYDER obtained or attempted to obtain more than 25 life insurance policies through these various fraudulent methods.

14. On or about March 6, 2002, Florence James drew Robert Mitchell's blood knowing Mitchell was posing as life insurance applicant H.D. at a medical examination.

15. On or about January 8, 2002, in the Eastern District and elsewhere, defendant

DAVID SNYDER,

for the purpose of executing the scheme and attempting to do so, knowingly caused a life insurance application for H.D. to be delivered by commercial interstate carrier from Bensalem, Pennsylvania to West Coast Life Insurance Company, San Francisco, California. The life

insurance application sent to West Coast Life Insurance Company contained fraudulent representations associated with the medical screening examination upon which the application was pending.

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

PATRICK L. MEEHAN
United States Attorney