

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA	:	Criminal No. 11-
	:	
v.	:	18 U.S.C. § 1343
	:	
KATHLEEN BAKER	:	<u>INFORMATION</u>
	:	

The defendant having waived in open court prosecution by Indictment, the United States Attorney for the District of New Jersey charges:

1. At various times relevant to this Information,
 - a. Defendant Kathleen Baker was a resident of Bricktown, New Jersey, and served as the office manager of a law firm in Lakewood, New Jersey (“Law Firm”).
 - b. Corporate Solutions was a fictitious corporate entity based in Lakewood, New Jersey created and used by defendant Kathleen Baker.

The Scheme and Artifice to Defraud

2. From in or about June 2003, to in or about June 2009, in the District of New Jersey, and elsewhere, defendant

KATHLEEN BAKER

did knowingly and intentionally devise and intend to devise a scheme and artifice to defraud and to obtain money by means of false and fraudulent pretenses, representations and promises.

Object of the Scheme and Artifice to Defraud

3. The primary object of the scheme and artifice to defraud was to steal money from the Law Firm, without the knowledge or consent of its principals, by charging the Law Firm for

services rendered by non-existent business entities, including but not limited to Corporate Solutions, and in defendant's capacity as office manager to authorize the transfer of monies from the Law Firm's bank accounts for payment for these fraudulent services.

The Manner and Means of the Scheme and Artifice to Defraud

4. To further the scheme and artifice to defraud and to bring about its object, defendant Kathleen Baker utilized personal bank accounts at Bank of America and TD Bank in attempt to conceal the flow of money from the Law Firm to defendant.

5. To further the scheme and artifice to defraud and to bring about its object, defendant Kathleen Baker opened a bank account in the name of Corporate Solutions at PNC Bank in attempt to conceal the flow of money from the Law Firm to defendant.

6. To further the scheme and artifice to defraud and to bring about its object, defendant Kathleen Baker, in her capacity as office manager of the Law Firm, authorized monies drawn from the Law Firm bank accounts to be wired to the various banks at which defendant had accounts in her name and in the name of Corporate Solutions.

7. To further the scheme and artifice to defraud and to bring about its object, defendant Kathleen Baker in her capacity as office manager of the Law Firm, authorized monies drawn from the Law Firm bank accounts to be wired to American Express from which defendant had secured credit, in order to pay the debts incurred personally by defendant.

8. To further the scheme and artifice to defraud and to bring about its object, defendant Kathleen Baker, between in or about June 2003 through in or about June 2009, caused monies from the Law Firm bank accounts to be wired to defendant's personal accounts, the Corporate Solutions account, and to American Express for the personal benefit of defendant in the amount of approximately \$1,137,000.

9. On or about June 6, 2005, in the District of New Jersey, and elsewhere, the defendant

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did knowingly and willfully cause writings, signs, signals and sounds to be transmitted by means of wire communication in interstate and foreign commerce, in that the defendant caused Bank of America to transmit and transfer by wire \$25,000 from the Law Firm's account at Bank of America to the defendant's personal account at TD Bank, in order to further the scheme and artifice to defraud as set forth herein.

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

PAUL J. FISHMAN

PAUL J. FISHMAN
United States Attorney