

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Criminal No.
v. : 18 U.S.C. §§ 1001 and 2
ROBERT LEVY :

INFORMATION

Defendant ROBERT LEVY having waived in open court prosecution by indictment, the United States Attorney for the District of New Jersey charges:

Defendant ROBERT LEVY

1. At all times relevant to this Information:

A. Defendant ROBERT LEVY was a resident of Atlantic County, New Jersey.

B. Defendant ROBERT LEVY served in the United States Army from in or about 1964 to in or about 1984. From in or about March 1966 to in or about March 1967, defendant LEVY served his first tour in Vietnam, at which time his assigned Military Occupational Specialty (hereinafter referred to as "MOS") was as a communications wireman and switchboard operator. From in or about September 1970 to in or about July 1971, defendant LEVY served his second tour in Vietnam, at which time his assigned MOS was as a communications systems advisor and village/hamlet security advisor.

C. Defendant ROBERT LEVY served as the Mayor of Atlantic City, New Jersey from on or about January 1, 2006 to on or about October 10, 2007.

2. At all times relevant to this Information:

A. The Department of Veterans Affairs (hereinafter referred to as the "VA") was a department within the executive branch of the Government of the United States.

B. The VA was responsible for, among other things, providing financial benefits to veterans of the United States military and their families. The financial benefits offered by the VA included pensions for eligible personnel and disability compensation for physical or psychological injuries sustained as a result of military service.

C. The Veterans Benefits Administration (hereinafter referred to as the "VBA") was a division of the VA responsible for reviewing and processing veterans' applications for pension benefits and claims for disability compensation. The VBA considered, among other things, an applicant's military service as well as the cause, nature, and extent of any physical or psychological injury to determine the appropriate financial compensation to be paid to a veteran.

False and Fraudulent Statements and Representations

3. In or about January 2003, defendant ROBERT LEVY submitted an application to the VBA in support of his claim for financial benefits. In that application, defendant LEVY knowingly and willfully made the following materially false, fictitious, and fraudulent statements and representations:

A. Defendant LEVY falsely and fraudulently stated that he had been awarded a Combat Infantryman Badge;

B. Defendant LEVY falsely and fraudulently stated

that he had been awarded a Parachutist's Badge;

C. Defendant LEVY falsely and fraudulently stated that he successfully completed Airborne School;

D. Defendant LEVY falsely and fraudulently stated that during the course of his military service he successfully parachuted up to 100 times;

E. Defendant LEVY falsely and fraudulently stated that he injured his shoulder during Airborne School and while participating in military operations; and

F. Defendant LEVY falsely and fraudulently stated that, during the Vietnam War, he was twice abandoned during battle by Vietnamese troops and left alone in the jungle for several weeks before being rescued, causing him to suffer from Post Traumatic Stress Disorder.

4. Defendant LEVY was assigned to a support unit during the Vietnam War. Defendant LEVY never completed Airborne School, and, therefore, never parachuted from an aircraft during his military service.

5. As a result of the materially false, fictitious, and fraudulent statements and representations set forth in paragraph 3 above, defendant ROBERT LEVY fraudulently obtained approximately \$24,683 in financial benefits from the VA.

6. In or about January 2003, in Atlantic County, in the District of New Jersey, and elsewhere, defendant

ROBERT LEVY

did knowingly and willfully make materially false, fictitious, and fraudulent statements and representations, as set forth in

paragraph 3 above, to the United States Department of Veterans Affairs, regarding a matter within the jurisdiction of the executive branch of the Government of the United States, namely, the application in support of defendant LEVY's claim for financial benefits.

In violation of Title 18, United States Code, Sections 1001 and 2.

CHRISTOPHER J. CHRISTIE
United States Attorney

CASE NUMBER: _____

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UNITED STATES OF AMERICA

v.

ROBERT LEVY

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For
18 U.S.C. §§ 1001 and 2

CHRISTOPHER J. CHRISTIE

*U.S. ATTORNEY
NEWARK, NEW JERSEY*

JASON M. RICHARDSON
*ASSISTANT U.S. ATTORNEY
856-757-5026*

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