

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

UNITED STATES OF AMERICA : **CRIMINAL NO. 09-59**

v. : **DATE FILED: _____**

TINA PAPLOSKY : **VIOLATIONS:**
: **18 U.S.C. § 1038 (making false and**
: **misleading statements concerning**
: **terrorism - 1 count)**
: **18 U.S.C. § 1341 (mail fraud - 1 count)**
: **Notice of forfeiture**

SUPERSEDING INFORMATION

COUNT ONE

THE UNITED STATES ATTORNEY CHARGES THAT:

On or about October 22, 2007, in Reading, in the Eastern District of Pennsylvania, and elsewhere, defendant

TINA PAPLOSKY

knowingly engaged in conduct with intent to convey false and misleading information under circumstances where such information may reasonably be believed and where such information indicated that an activity had taken place, was taking place, and would take place that would constitute a violation of Chapter 113B (Terrorism) of Title 18, United States Code, when defendant PAPLOSKY sent a letter to the Central Intelligence Agency including the following statements, knowing them to be false and fictitious:

“[D.B.D.] poses an extreme terrorist threat to the United States government and its citizens. I have reason to believe that [D.B.D.] is involved in a plot to harm America. . . . He is planning on destroying the U.S. Government and the freedom of it's American citizens by devising a plan to use explosive devises to attack key areas like government buildings and public areas like subways. [D.B.D.] is interested in attacking American in areas which it

would do the most harm. . . . [D.B.D.] is a mastermind of his game and has links to terrorist organizations throughout the United States and abroad. Make no mistake this man is extremely dangerous ”

In violation of 18, United States Code, Section 1038(a)(1).

COUNT TWO

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

1. From on or about September 4, 2001 until on or about October 17, 2008, defendant TINA PAPLOSKY was an employee of the Wilson School District (“the District”), working in the office of the Director of Finance.

2. On or about August 14, 2006, defendant TINA PAPLOSKY was promoted to the position of Real Estate Tax Specialist. In that position, defendant PAPLOSKY oversaw the real estate and per capita taxes imposed by the District on taxpayers. Defendant PAPLOSKY’s responsibilities included tracking payments of assessed school taxes and reporting delinquent accounts.

THE SCHEME

3. From on or about to on or about August 14, 2006 through in or about November 2007, defendant

TINA PAPLOSKY

devised and intended to devise a scheme to defraud the District and to obtain money and property by means of materially false and fraudulent pretenses and representations.

MANNER AND MEANS

It was part of the scheme that:

4. The District was authorized to assess and collect taxes on an annual basis from record owners of real estate in the District. Payments were made primarily to an account at Fulton Bank. On a daily basis, Fulton Bank recorded, printed out, and delivered in hard copy to the District a record of each payment it received. This same information was maintained

electronically by a county organization retained by the District.

6. Defendant TINA PAPLOSKY's primary responsibility was to track the payment of property taxes for the District, including among other things, making adjustments for the sale of properties and for inadvertent double payments of the tax.

7. Defendant TINA PAPLOSKY used her access to this information and her relationships with the Fulton Bank and county personnel to create false paperwork to make it appear that some taxpayers had erroneously paid the assessed real estate tax twice in the same year, when, in fact they had not.

8. After creating false paperwork in the District's records, defendant TINA PAPLOSKY then caused the District to issue and mail "refund" checks to post office boxes that defendant PAPLOSKY opened and controlled in names similar to those of actual taxpayers or tax-paying entities, or to third parties for the benefit of defendant PAPLOSKY.

9. Defendant TINA PAPLOSKY, prior to resigning from her employment with the District, submitted paperwork and initiated a "refund" to the Bank of America for what she fraudulently misrepresented were second payments made by the Bank of America on behalf of several different District taxpayers.

10. On or about October 31, 2007, in Reading, in the Eastern District of Pennsylvania, and elsewhere, defendant

TINA PAPLOSKY,

for the purpose of executing the scheme described above, and attempting to do so, knowingly caused to be placed in an authorized depository for mail matter any matter or thing to be sent and delivered by the Postal Service according to the directions thereon, namely a letter enclosing a

check in the amount of \$26,341.02, issued by the District, payable to defendant PAPLOSKY's
Bank of America credit card account number ending 6116 69.

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

NOTICE OF FORFEITURE

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

1. As a result of the violation of Title 18, United States Code, Section 1341 set forth in this information, defendant

TINA PAPLOSKY

shall forfeit to the United States of America any property, real or personal, that constitutes or is derived from proceeds traceable to the commission of such offenses, including, but not limited to:

- a. the sum of \$ 92,129.97; and
- b. the real property commonly known as 1000 Airport Road, Reading, Pennsylvania.

2. If any of the property subject to forfeiture, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the 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 intent of the United States, pursuant to Title 18, United States Code, Section 981, incorporating 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, Section 981(d).

MICHAEL L. LEVY
United States Attorney