

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

<b>UNITED STATES OF AMERICA</b>	<b>:</b>	<b>CRIMINAL NO. _____</b>
<b>v.</b>	<b>:</b>	<b>DATE FILED: _____</b>
<b>PAMELA A. MILLS</b>	<b>:</b>	<b>VIOLATIONS:</b>
		<b>18 U.S.C. § 1341 (mail fraud - 18 counts)</b>
	<b>:</b>	<b>18 U.S.C. § 1343 (wire fraud - 2 counts)</b>
		<b>26 U.S.C. § 7206(1) (willfully filing false federal income tax returns - 3 counts)</b>

**INDICTMENT**

**COUNTS ONE THROUGH EIGHTEEN**

**THE GRAND JURY CHARGES THAT:**

At all times relevant to this indictment:

1. From approximately 1993 through approximately July 30, 2008, defendant PAMELA A. MILLS was employed at Synergy Software, Maxwell Resources, Inc. (hereafter referred to as "Synergy Software"), 2457 Perkiomen Avenue, Reading, Pennsylvania. Synergy Software was a computer software company which provided software packages which they sold for various licensing fees. Throughout the relevant time period, defendant MILLS was employed as a bookkeeper/account manager at Synergy Software. Her duties and responsibilities included performing accounting duties, having access to the business accounts for purposes of making deposits into those accounts, disbursing petty cash, access to the Synergy Software business credit cards, using wire transfers to pay business expenses, and having authority to write

and sign corporate checks from both operating account for business expenses if these matters were in the normal course of business, and the payroll account.

### **THE SCHEME**

2. From in or about 2000, through on or about July 30, 2008, in the Eastern District of Pennsylvania and elsewhere, defendant

### **PAMELA A. MILLS**

devised and intended to devise a scheme to defraud Synergy Software, 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:

3. Between 2000 and in or about July 2008, defendant PAMELA A. MILLS embezzled approximately \$1.5 million in funds from her employer, Synergy Software, to pay for her own personal expenses and lifestyle, without the prior knowledge and consent of her employer.

4. Defendant PAMELA A. MILLS executed the fraudulent scheme by abusing the trust given to her by Synergy Software to write checks solely for business purposes, and instead wrote checks on Synergy Software's operating account made payable both to herself, and her husband, which defendant MILLS endorsed and then deposited into her personal accounts at National Penn Bank and Wachovia Bank.

5. Defendant PAMELA A. MILLS further executed the fraudulent scheme by writing checks drawn on Synergy Software's business accounts to pay for her personal credit card debt.

6. Defendant PAMELA A. MILLS further executed the fraudulent scheme by writing business checks payable to “cash,” and “petty cash,” and then endorsed and cashed these checks for her own personal expenses and lifestyle.

7. Defendant PAMELA A. MILLS further executed the fraudulent scheme by making unauthorized wire transfers from Synergy Software business accounts to pay for her personal expenses and lifestyle.

8. Defendant PAMELA A. MILLS further executed the fraudulent scheme by using a Synergy Software business credit card and shipping accounts for her own personal expenses and lifestyle without prior authorization from her employer.

9. Between in or about 2000 and in or about July 2008, as a result of defendant MILLS’s fraudulent scheme, defendant PAMELA A. MILLS defrauded Synergy Software of money and funds based on the embezzlement using checks and wire transfers, for a total fraudulent loss amount of approximately \$1.5 million.

10. On each of the dates listed below, each date constituting a separate count, in the Eastern District of Pennsylvania, and elsewhere, defendant

**PAMELA A. MILLS,**

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, various items described, as follows:

<u>COUNT</u>	<u>DATE</u>	<u>DESCRIPTION</u>	<u>AMOUNT</u>
1.	January 18, 2006	check no. 11381 drawn on Synergy Software, National Penn Bank, payable to American Express, mailed from Reading, PA to Ft. Lauderdale, FL	\$11,356.20
2.	May 24, 2006	check no. 11557 drawn on Synergy Software, National Penn Bank, payable to American Express, mailed from Reading, PA to Ft. Lauderdale, FL	\$2,589.88
3.	June 22, 2006	check no. 11571 drawn on Synergy Software, National Penn Bank, payable to American Express, mailed from Reading, PA to Ft. Lauderdale, FL	\$2,717.93
4.	August 21, 2006	check no. 11612 drawn on Synergy Software, National Penn Bank, payable to American Express, mailed from Reading, PA to Ft. Lauderdale, FL	\$7,796.77

<b><u>COUNT</u></b>	<b><u>DATE</u></b>	<b><u>DESCRIPTION</u></b>	<b><u>AMOUNT</u></b>
5.	January 15, 2007	check no. 11770 drawn on Synergy Software, National Penn Bank, payable to American Express, mailed from Reading, PA to Ft. Lauderdale, FL	\$19,496.34
6.	July 5, 2007	check no. 11914 drawn on Synergy Software, National Penn Bank, payable to American Express, mailed from Reading, PA to Ft. Lauderdale, FL	\$4,152.62
7.	July 17, 2007	check no. 11933 drawn on Synergy Software, National Penn Bank, payable to American Express, mailed from Reading, PA to Ft. Lauderdale, FL	\$4,378.34
8.	July 25, 2007	check no. 11937 drawn on Synergy Software, National Penn Bank, payable to American Express, mailed from Reading, PA to Ft. Lauderdale, FL	\$5,100.00
9.	February 3, 2006	check no. 11395 drawn on Synergy Software, National Penn Bank, payable to US Bank, Harley Davidson VISA card, mailed from Reading, PA to St. Louis, MO	\$5,000.00

<b><u>COUNT</u></b>	<b><u>DATE</u></b>	<b><u>DESCRIPTION</u></b>	<b><u>AMOUNT</u></b>
<b>10 .</b>	March 8, 2006	check no. 11446 drawn on Synergy Software, National Penn Bank, payable to US Bank, Harley Davidson VISA card, mailed from Reading, PA to St. Louis, MO	\$5,000.00
<b>11 .</b>	April 10, 2006	check no. 11498 drawn on Synergy Software, National Penn Bank, payable to US Bank, Harley Davidson VISA card, mailed from Reading, PA to St. Louis, MO	\$7,500.00
<b>12 .</b>	May 5, 2006	check no. 11540 drawn on Synergy Software, National Penn Bank, payable to US Bank, Harley Davidson VISA card, mailed from Reading, PA to St. Louis, MO	\$6,500.00
<b>13 .</b>	May 22, 2006	check no. 11548 drawn on Synergy Software, National Penn Bank, payable to US Bank, Harley Davidson VISA card, mailed from Reading, PA to St. Louis, MO	\$12,000.00

<u>COUNT</u>	<u>DATE</u>	<u>DESCRIPTION</u>	<u>AMOUNT</u>
14 .	June 29, 2006	check no. 11581 drawn on Synergy Software, National Penn Bank, payable to US Bank, Harley Davidson VISA card, mailed from Reading, PA to St. Louis, MO	\$2,500.00
15 .	November 7, 2006	check no. 11696 drawn on Synergy Software, National Penn Bank, payable to US Bank, Harley Davidson VISA card, mailed from Reading, PA to St. Louis, MO	\$25,321.23
16 .	February 8, 2007	check no. 11787 drawn on Synergy Software, National Penn Bank, payable to US Bank, Harley Davidson VISA card, mailed from Reading, PA to St. Louis, MO	\$14,949.09
17 .	April 20, 2007	check no. 11867 drawn on Synergy Software, National Penn Bank, payable to US Bank, Harley Davidson VISA card, mailed from Reading, PA to St. Louis, MO	\$2,750.00

<u>COUNT</u>	<u>DATE</u>	<u>DESCRIPTION</u>	<u>AMOUNT</u>
18 .	July 5, 2007	check no. 11915 drawn on Synergy Software, National Penn Bank, payable to US Bank, Harley Davidson VISA card, mailed from Reading, PA to St. Louis, MO	\$5,000.00

All in violation of Title 18, United States Code, Section 1341.



**COUNTS NINETEEN AND TWENTY**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. The allegations contained in paragraphs 1 through 9 of Counts One through Eighteen of this indictment are re-alleged and incorporated here.
2. On or about each of the dates set forth below, each date constituting a separate count, in the Eastern District of Pennsylvania and elsewhere, defendant

**PAMELA A. MILLS,**

for the purpose of executing the scheme described above, caused to be transmitted by means of wire communications in interstate commerce, signals and sounds, that is, a wire transfer of funds from National Penn Bank in Reading, Pennsylvania to Manufacturers and Traders Trust Company (M & T Bank), through its clearing house in Buffalo, New York :

<b><u>COUNT</u></b>	<b><u>DATE</u></b>	<b><u>AMOUNT</u></b>	<b><u>FUNDS PAYABLE TO</u></b>
19.	1/2/2008	\$10,000.00	Colebrookdale Management
20.	2/8/2008	\$5,000.00	Colebrookdale Management

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

**COUNT TWENTY-ONE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about April 15, 2007, in the Eastern District of Pennsylvania, defendant

**PAMELA A. MILLS**

willfully made and subscribed a United States income tax return, Form 1040, for the calendar year 2006, which was verified by a written declaration that it was made under the penalty of perjury and filed with the Internal Revenue Service, which defendant MILLS did not believe to be true and correct as to every material matter, in that the return reported taxable income of approximately \$53,311.00, when in fact, as defendant MILLS well knew, she failed to report additional taxable income of approximately \$269,483.44.

In violation of Title 26, United States Code, Section 7206(1).

**COUNT TWENTY-TWO**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about September 3, 2008, in the Eastern District of Pennsylvania, defendant

**PAMELA A. MILLS**

willfully made and subscribed a United States income tax return, Form 1040, for the calendar year 2007, which was verified by a written declaration that it was made under the penalty of perjury and filed with the Internal Revenue Service, which defendant MILLS did not believe to be true and correct as to every material matter, in that the return reported taxable income of approximately \$18,165.00, when in fact, as defendant MILLS well knew, she failed to report additional taxable income of approximately \$291,609.11.

In violation of Title 26, United States Code, Section 7206(1).

**COUNT TWENTY-THREE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about April 15, 2009, in the Eastern District of Pennsylvania, defendant

**PAMELA A. MILLS**

willfully made and subscribed a United States income tax return, Form 1040, for the calendar year 2008, which was verified by a written declaration that it was made under the penalty of perjury and filed with the Internal Revenue Service, which defendant MILLS did not believe to be true and correct as to every material matter, in that the return reported taxable income of approximately \$8,112.00, when in fact, as defendant MILLS well knew, she failed to report additional taxable income of approximately \$164,636.41.

In violation of Title 26, United States Code, Section 7206(1).

**A TRUE BILL:**

**GRAND JURY FOREPERSON**

**ZANE DAVID MEMEGER**  
**United States Attorney**