

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

UNITED STATES OF AMERICA	:	CRIMINAL NO. 11-_____
v.	:	DATE FILED: _____
SUSAN L. STINSON	:	VIOLATIONS:
	:	18 U.S.C. § 1505 (obstruction of justice –
	:	2 counts)
	:	18 U.S.C. § 1001 (false statements - 1
	:	count)

INFORMATION

COUNTS ONE AND TWO

THE UNITED STATES ATTORNEY CHARGES THAT:

BACKGROUND

At all times material to this indictment:

1. In approximately June 2010, the Securities Exchange Commission (“SEC”) initiated a civil investigation, and the Federal Bureau of Investigation, the United States Postal Inspection Service (“USPIS”), the Internal Revenue Service Criminal Investigation (“IRS-CI”) and the United States Attorney’s Office commenced a criminal investigation into, among other things, Robert Stinson, charged elsewhere, and the “Ponzi” scheme he conducted through Life’s Good and various related companies.

2. On June 29, 2010, special agents from the FBI executed search warrants at the residence shared by Robert Stinson and defendant SUSAN L. STINSON, and various business addresses used to perpetuate the fraud.

3. On June 29, 2010, the SEC filed a complaint against Robert Stinson, defendant SUSAN L. STINSON, and others, alleging that Robert Stinson ran the Ponzi scheme

since 2006 and had stolen millions of dollars that was spent by Stinson, defendant SUSAN L. STINSON, and others.

4. On July 12, 2010, defendant SUSAN L. STINSON consented, in writing, to the entry of an Order of Preliminary Injunction Freezing Assets and Granting Other Relief.

5. On July 13, 2010, the Honorable Berle M. Schiller, United States District Judge for the Eastern District of Pennsylvania, entered an Order (the "Freeze Order") enjoining defendant SUSAN L. STINSON, and others, from:

withdrawing, transferring, assigning, selling, pledging, hypothecating, changing, wasting, dissipating, converting, concealing, encumbering, or otherwise disposing of, in any manner, any funds, assets, accounts, securities, claims, or other real or personal property . . . in the name, for the benefit, or under [their] control

This Freeze Order also required defendant SUSAN L. STINSON, and others, to provide the SEC with a full and complete accounting of her assets and liabilities within twenty days. The purpose of the Freeze Order was to preserve all assets stolen from victims of Robert Stinson's fraud for eventual distribution to the victims, who included individuals who had lost their life savings.

6. On July 31, 2010, in accordance with the Court's Freeze Order, defendant SUSAN L. STINSON provided the SEC a completed "Background Questionnaire" and a "Statement of Financial Condition." In these two documents, STINSON listed all bank accounts, securities and assets, including pre-paid expenses, she owned, or possessed. On these forms, STINSON represented to the SEC that she had only two bank accounts, one at TD Bank and another at First Republic Bank, had no pre-paid expenses in excess of \$1,000, and had no other assets besides \$30,000 in household goods and furniture, \$75,000 in automobiles, and \$9,000 in a retirement account.

7. Defendant SUSAN L. STINSON concealed from the SEC the fact that she had incurred substantial pre-paid expenses in 2010, including a vacation that cost approximately \$23,000, that was purchased with victims' money. Defendant SUSAN L. STINSON also concealed other assets and sources of income she possessed.

8. After the entry of the Freeze Order, defendant SUSAN L. STINSON used bank accounts opened by other people, to conceal from the SEC assets she retained and used.

9. Defendant SUSAN L. STINSON, Robert Stinson, and others, also incorporated a company in Delaware, and then set up a bank account for this company, as an additional vehicle to conceal assets from the SEC.

10. On or about the dates listed below, in the Eastern District of Pennsylvania, and elsewhere, defendant

SUSAN L. STINSON

corruptly influenced, obstructed, and impeded, and endeavored to influence, obstruct, and impede, the due and proper administration of the law, under which any pending proceeding is being had before any department or agency of the United States, that is, the ongoing federal investigation by the SEC, into the illegal activities of her husband Robert Stinson, by engaging in the following obstructive conduct:

<u>Count</u>	<u>Date</u>	<u>Obstructive Conduct</u>
One	August 27, 2010	Defendant SUSAN L. STINSON paid approximately \$2,600 for her son's luxury apartment with a check drawn from a bank account for a company named "Evocarti LLC," in direct violation of the Freeze Order.
Two	November 1, 2010	Defendant SUSAN L. STINSON paid \$17,000 for her rented mansion with a check drawn on a PNC bank account, in the of the "Eclipsechannel.tv," in direct violation of the Freeze Order.

All in violation of Title 18, United States Code, Section 1505.

COUNT THREE

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

1. Paragraphs One through Nine of Counts One through Two of this information are incorporated here.
2. On or about July 31, 2010, in Philadelphia, in the Eastern District of Pennsylvania, defendant

SUSAN L. STINSON,

in a matter within the jurisdiction of the United States Securities Exchange Commission, an agency of the executive branch of the United States, knowingly and willfully made materially false, fictitious, and fraudulent statements and representations in that defendant STINSON stated that she had no pre-paid expenses, when, in fact defendant STINSON had, among other things, paid more than \$23,000 for a family vacation, and more than \$16,000 in rent for her son's luxury apartment.

In violation of Title 18, United States Code, Section 1001.


ZANE DAVID MEMEGER
United States Attorney