

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

<b>UNITED STATES OF AMERICA</b>	:	<b>CRIMINAL NO. 12-__</b>
	:	
<b>v.</b>	:	<b>DATE FILED:</b>
	:	
<b>HAZEL THOMAS</b>	:	<b>VIOLATION:</b>
	:	<b>18 U.S.C. § 1001 (false statements –</b>
	:	<b>1 count)</b>
	:	

**INFORMATION**

**COUNT ONE**

**THE UNITED STATES ATTORNEY CHARGES THAT:**

At all times material to this information:

1. The U.S. Department of Labor, Office of Workers' Compensation Programs (DOL-OWCP) is responsible for administering the Federal Employees' Compensation Act (FECA), which provides compensation benefits for eligible civilian employees of the U.S. Government who sustain on-the-job injuries or employment related occupational illness or disease.
2. Under the FECA program, DOL-OWCP provides the injured employee with compensation and medical benefits but back-charges the employing agency 100% of the costs plus an administrative fee.
3. If the employee is considered disabled and cannot work for some period of time, the DOL-OWCP may place the employee on the "periodic roll." If married, an employee on the periodic roll will receive 75% of his salary at the time of injury. If unmarried, an

employee will receive 66 2/3% of his salary at the time of injury. Such compensation is not subject to taxation.

4. As a condition of receipt of FECA benefits on the periodic roll, the injured employee is required to annually submit form EN-1032. This form requires disclosure of current information regarding work and earnings, dependency, and other benefits. The EN-1032 covers the fifteen months prior to the date the form is completed and signed.

5. Form EN-1032 requires the employee to report all employment for which he has received a salary, wages, income, sales commission, piecework, or payment of any kind.

6. Form EN-1032 contains a certification section in which the employee must certify that the information he provides is true and accurate to the best of his knowledge and belief.

7. Defendant HAZEL THOMAS's father, identified in this information as "T.T.," was a United States Postal Service ("USPS") employee who received FECA benefits for an on-the-job injury that occurred in or around 1971.

8. T.T. died on September 3, 2010. At the time of his death, T.T.'s FECA benefits were electronically deposited into a bank account each month. Defendant HAZEL THOMAS did not notify the Department of Labor of her father's death.

9. On or about November 15, 2010, the Department of Labor received a form EN-1032 that defendant HAZEL THOMAS falsely completed in her father's name.

10. Unaware of T.T.'s death in September 2010, and believing him to be alive based on the form EN-1032 that was falsely submitted by defendant HAZEL THOMAS in

November 2010, the Department of Labor continued to deposit T.T.'s FECA benefits into his bank account.

11. The Department of Labor, upon learning of T.T.'s death, terminated his FECA payments in or around April 2011.

12. Prior to the termination of payments by the Department of Labor, defendant HAZEL THOMAS improperly received a total of approximately \$17,380.83 in FECA payments that were intended for T.T., who was deceased, which defendant HAZEL THOMAS knew she was not entitled to receive.

13. Beginning in or about September 2010 through in or about April 2011, in the Eastern District of Pennsylvania and elsewhere, defendant

**HAZEL THOMAS**

knowingly and willfully made materially false, fictitious, and fraudulent statements and representations to the Department of Labor, an agency of the executive branch of the United States, in that defendant HAZEL THOMAS completed Department of Labor form EN-1032 in her deceased father's name, thereby representing that he was still alive and entitled to continue receiving FECA benefits when, in truth and in fact, her father was deceased and defendant HAZEL THOMAS intended to convert those FECA payments for her own personal use.

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

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