

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

UNITED STATES OF AMERICA : **CRIMINAL NO.** _____
v. : **DATE FILED:** _____
GLEN WERLEY : **VIOLATION:**
18 U.S.C. § 1343 (wire fraud - 1 count)

INFORMATION

THE UNITED STATES ATTORNEY CHARGES THAT:

1. At all times material to this information, defendant GLEN WERLEY was the Food Services Manager at Bucks County Technical High School, a public high school in the Eastern District of Pennsylvania.
2. The United States Department of Agriculture ("USDA") subsidizes meals for students at participating schools, under the National School Lunch Program and the School Breakfast Program. At all times material to this information, Bucks County Technical High School participated in the National School Lunch Program and the School Breakfast Program.
3. It is part of the National School Lunch Program and the School Breakfast Program that eligible students at participating schools receive free or reduced-price breakfast and lunch in the school cafeteria. For each free or reduced-price meal purchased by an eligible student, the participating school makes a claim for reimbursement that, when approved, is paid with funds provided by USDA.
4. In Pennsylvania, the Pennsylvania Department of Education processes the claims from participating schools, and receives USDA funds from the United States Treasury which it disburses to pay approved claims.

5. At all times relevant to this information, the Bucks County Technical High School cafeteria had three lunch lines, and a snack cart. At each of the three lunch lines, a student could pay for his or her meal with cash, or could debit a student account by swiping his or her student identification card at a point-of-sale card reader attached to the register. The snack cart, however, had no cash register or point-of-sale card reader. The snack cart only accepted cash, which went into a cash box.

6. At all times relevant to this information, in order to receive a free or reduced-price breakfast or lunch, an eligible student had to swipe his or her card in a point-of-sale card reader.

THE SCHEME

7. From in or about September 2008 to in or about June 2011, defendant

GLEN WERLEY

devised and intended to devise a scheme to defraud the USDA and to obtain money by means of false and fraudulent pretenses, representations and promises.

MANNER AND MEANS

It was part of the scheme that:

8. Defendant GLEN WERLEY stole cash from the snack cart's cash box on a regular basis for his personal use and enrichment.

9. To cover up his thieving, and to increase revenue in the cafeteria, defendant GLEN WERLEY created and submitted false claims for reimbursement under the National School Lunch Program and School Breakfast Program, by claiming that various eligible students had been in the cafeteria and had received free or reduced-price meals when they had not.

10. Defendant GLEN WERLEY created the false and fraudulent claims by typing them into a computer software application that compiled data from the three lunch-line point-of-

sale card readers. Defendant WERLEY then caused claims for reimbursement to be sent electronically to the Pennsylvania Department of Education, which caused, in turn, the Pennsylvania Department of Education to send electronic data via interstate wire and to receive funds via interstate wire from the U.S. Treasury to pay the claims.

11. As a result of defendant GLEN WERLEY's false and fraudulent submissions, the USDA, using federal funds, paid the school over \$179,000 for free and reduced-price meals that were never provided, including meals claimed for students who were absent from school, or, in one case, for a student who did not attend the school.

12. On or about October 13, 2009, in the Eastern District of Pennsylvania and elsewhere, defendant

GLEN WERLEY,

for the purpose of executing the scheme described above, and attempting to do so, caused to be transmitted by means of wire communication in interstate commerce the signals and sounds described below:

COUNT	DATE	DESCRIPTION
One	October 13, 2009	Wire transmission of a payment request from the Pennsylvania Department of Education in Harrisburg, Pennsylvania to a federal data processing center in Dallas, Texas, incorporating false claims for reimbursement certified by defendant GLEN WERLEY for 852 free and reduced-price lunches and 1947 free and reduced-price breakfasts that were not served to students.

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

for R. Taylor Spauld
ZANE DAVID MEMEGER
United States Attorney