

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

<b>UNITED STATES OF AMERICA</b>	:	<b>CRIMINAL NO.</b> _____
	:	
<b>v.</b>	:	<b>FILED:</b> _____
	:	
<b>ROBIN WOOD</b>	:	<b>VIOLATIONS:</b>
	:	<b>18 U.S.C. § 1343 (wire fraud – 2 counts);</b>
	:	<b>18 U.S.C. § 641 (theft of government</b>
	:	<b>money – 1 count);</b>
	:	<b>Notice of forfeiture</b>

**INDICTMENT**  
**COUNTS ONE AND TWO**  
**(Wire Fraud)**

**THE GRAND JURY CHARGES:**

**INTRODUCTION**

At all times relevant to the indictment:

1. The United States Internal Revenue Service (“IRS”) is an agency of the United States.
2. The Unemployment Compensation Program for the IRS was established, in part, to assist federal employees who are seasonally furloughed by the IRS to receive benefits when work was not available to them. This program and the extended unemployment benefits under the Emergency Unemployment Compensation program were federally funded.
3. The Federal Additional Compensation Program established by the American Recovery and Reinvestment Act of 2009, allowed states to enter into an agreement with the Secretary of the U.S. Department of Labor to pay an additional \$25 in federal funds each week to individuals who were otherwise eligible to receive unemployment compensation benefits.

4. In the Commonwealth of Pennsylvania, the IRS delegated administrative functions of its Unemployment Compensation Program to the Pennsylvania Department of Labor to determine unemployment compensation eligibility and to administer the distribution of such benefits in Pennsylvania.

5. Individuals seeking unemployment compensation benefits were required to apply on a weekly basis for such benefits by truthfully answering a series of questions through an internet site or a telephone voice-response system to determine their eligibility to receive unemployment compensation funds.

6. Unemployment compensation disbursements were made to those applicants who authorized electronic payments of their unemployment benefits by an electronic wire transfer signal from the Pennsylvania Treasury in Harrisburg, Pennsylvania, through an interstate Electronic Payment Network, to the applicant's designated bank account.

#### **THE SCHEME TO DEFRAUD**

7. From on or about November 10, 2007, through on or about July 3, 2010, in the Eastern District of Pennsylvania and elsewhere, defendant

#### **ROBIN WOOD**

devised and intended to devise a scheme to defraud the Commonwealth of Pennsylvania Department of Labor and to obtain money and property by means of false and fraudulent pretenses, representations and promises.

8. It was the object of the scheme described in paragraph 7 for defendant ROBIN WOOD to receive and continue to receive unemployment compensation benefits and federal additional compensation benefits to which she was not entitled.

**MANNER AND MEANS**

It was part of the scheme that:

9. Defendant ROBIN WOOD used the internet and the telephone Interactive Claims Response System at the Pennsylvania Department of Labor on a weekly basis to answer a series of questions to determine her eligibility in which she falsely stated that she was not working, that work was not available, and that she was eligible to receive unemployment compensation benefits from the Pennsylvania Department of Labor when, in fact, she was working at the IRS and she was not eligible to receive such benefits.

10. Defendant ROBIN WOOD failed to disclose to the Pennsylvania Department of Labor when applying for unemployment compensation benefits that, in fact, she was working and receiving income from the IRS.

11. Defendant ROBIN WOOD authorized and caused the Pennsylvania Department of Labor to electronically deposit unemployment compensation payments into her bank account at Columbus Bank and Trust Company, account no. xxxxxxxxxxxxxx-4268, routing no. 61120000.

12. Defendant ROBIN WOOD obtained approximately \$43,812 in total, over approximately 100 weeks, in unemployment compensation payments to which she was not entitled.

13. Defendant ROBIN WOOD obtained an additional \$1,500 in total, over approximately 60 weeks, from the Federal Additional Compensation Program to which she was not entitled.

14. On or about the dates set forth below, in the Eastern District of Pennsylvania and elsewhere, defendant

**ROBIN WOOD**

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 for each count, each transmission constituting a separate count of this indictment:

COUNT	DATE (on or about)	DESCRIPTION
<b>1</b>	July 1, 2010	Interstate wire transfer of checks totaling approximately \$2,350.00 from the Unemployment Compensation Program to the account of defendant ROBIN WOOD at Columbus Bank and Trust Co. a/c no. x-4268, routing no. 61120000
<b>2</b>	July 3, 2010	Interstate wire transfer of checks totaling approximately \$125.00 from the Federal Additional Compensation Program to the account of defendant ROBIN WOOD at Columbus Bank and Trust Co. a/c no. x-4268, routing no. 61120000

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



**COUNT THREE**  
(Theft of Government Funds)

**THE GRAND JURY FURTHER CHARGES:**

1. Paragraphs 1 through 6 and 9 through 13 of Count One are incorporated here.
2. From on or about November 10, 2007, through on or about July 3, 2010, in the Eastern District of Pennsylvania and elsewhere, defendant

**ROBIN WOOD**

stole, purloined and knowingly converted to her own use money and property of the United States in an amount over \$1,000.00, that is, weekly unemployment compensation benefits and Federal Additional Compensation benefits, paid by the Pennsylvania Department of Labor, totaling approximately \$45,312.

In violation of Title 18, United States Code, Section 641.

**NOTICE OF FORFEITURE**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. As a result of the violation of Title 18, United States Code, Sections 1343 and 641, set forth in this indictment, defendant

**ROBIN WOOD**

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, as charged in this indictment, including, but not limited to, the sum of \$45,312.

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 to, sold to, or deposited with a third party;
- c. has been placed beyond the jurisdiction of this 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 Title 21, United States Code, Section 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(a)(1)(C) made applicable by Title 28, United States Code, Section 2461(c).

A TRUE BILL:

---

GRAND JURY FOREPERSON

A handwritten signature in black ink, appearing to read "Zane F Schuch for". The signature is written in a cursive, flowing style.

---

**ZANE DAVID MEMEGER**  
United States Attorney