



week for weeks of unemployment ending on or before July 31, 2020.

d. The Pandemic Emergency Unemployment Compensation (“PEUC”) Program allowed those who had exhausted benefits under regular unemployment compensation or other programs to receive up to 13 weeks of additional federally funded benefits.

e. The Pandemic Unemployment Assistance (“PUA”) Program allowed individuals who do not qualify for regular unemployment compensation and were unable to continue working as a result of COVID-19, such as self-employed workers and independent contractors, to file for unemployment benefits. PUA provided up to 39 weeks of benefits to qualifying individuals who were otherwise able to work and available for work within the meaning of applicable state law, except that they were unemployed, partially unemployed, or unable or unavailable to work due to COVID-19 related reasons, as defined in the CARES Act. Unemployment benefit payments under PUA were retroactive for weeks of unemployment, partial employment, or inability to work due to COVID-19 reasons starting on or after January 27, 2020.

f. Residents of Maryland, or individuals who resided in another state but worked primarily in Maryland, and who became unemployed through no fault of their own, had the option of initiating their unemployment claim electronically via the website for the Maryland Division of Unemployment Insurance.

g. Unemployment insurance claims filed electronically with the Maryland Division of Unemployment Insurance were processed by a server located

in Virginia.

2. Beginning in approximately June 2020, and continuing to on or about August 4, 2020, in Homewood and DeKalb, within the Northern District of Illinois, and elsewhere,

ROBERT CARTER,

defendant herein, and others known and unknown to the grand jury, knowingly devised, intended to devise, and participated in a scheme to defraud the Maryland Division of Unemployment Insurance and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, which scheme is more fully set out below.

3. It was a part of the scheme that defendant and others involved in the scheme electronically submitted fraudulent PUA unemployment insurance claims to the Maryland Division of Unemployment Insurance resulting in more than \$506,000 in unemployment benefits for claimants who, as defendant knew, were not entitled to unemployment benefits from the Maryland Division of Unemployment Insurance.

4. It was further part of the scheme that defendant and others involved in the scheme used their own names, dates of birth, and social security numbers, and obtained the names, dates of birth, and social security numbers of others, and electronically filed fraudulent PUA unemployment insurance claims with the Maryland Division of Unemployment Insurance for claimants who, as defendant knew, did not work in Maryland and who did not live in Maryland.

5. It was further part of the scheme that defendant and others involved in

the scheme opted to have the fraudulent unemployment benefits paid via debit cards that were mailed to residences connected to defendant and others involved in the scheme, including residences in Homewood and DeKalb, Illinois.

6. It was further part of the scheme that defendant obtained the debit cards containing unemployment benefits in the names of claimants who were not entitled to unemployment benefits, including defendant, from the Maryland Division of Unemployment Insurance and withdrew funds from the debit cards at financial institutions and automated teller machines located in Illinois.

7. It was further part of the scheme that defendant did misrepresent, conceal, and hide, and caused to be misrepresented, concealed, and hidden, acts done in furtherance of the scheme and the purpose of those acts.

8. On or about June 18, 2020, at Homewood, Illinois, in the Northern District of Illinois, and elsewhere,

ROBERT CARTER,

defendant herein, for the purpose of executing the scheme, knowingly caused to be transmitted by means of wire communication in interstate commerce certain writings, signs, signals, and sounds, namely, an unemployment insurance claim in defendant's name sent from Homewood, Illinois to the Maryland Division of Unemployment Insurance, processed through servers located in Virginia;

In violation of Title 18, United States Code, Section 1343.

**COUNT TWO**

The SPECIAL APRIL 2021 GRAND JURY further charges:

1. Paragraphs 1-7 of Count One of this indictment are incorporated here.
2. On or about June 19, 2020, at Homewood, Illinois, in the Northern

District of Illinois, and elsewhere,

ROBERT CARTER,

defendant herein, for the purpose of executing the scheme, knowingly caused to be transmitted by means of wire communication in interstate commerce certain writings, signs, signals, and sounds, namely, an unemployment insurance claim in the name of S.M. sent from Homewood, Illinois to the Maryland Division of Unemployment Insurance, processed through servers located in Virginia;

In violation of Title 18, United States Code, Section 1343.

**COUNT THREE**

The SPECIAL APRIL 2021 GRAND JURY further charges:

1. Paragraphs 1-7 of Count One of this indictment are incorporated here.
2. On or about June 19, 2020, at Homewood, Illinois, in the Northern District of Illinois, and elsewhere,

ROBERT CARTER,

defendant herein, for the purpose of executing the scheme, knowingly caused to be transmitted by means of wire communication in interstate commerce certain writings, signs, signals, and sounds, namely, an unemployment insurance claim in the name of Q.G. sent from Homewood, Illinois to the Maryland Division of Unemployment Insurance, processed through servers located in Virginia;

In violation of Title 18, United States Code, Section 1343.

### **FORFEITURE ALLEGATION**

The SPECIAL APRIL 2021 GRAND JURY further alleges:

1. Upon conviction of an offense in violation of Title 18, United States Code, Section 1343, as set forth in this Indictment, defendant shall forfeit to the United States of America any property which constitutes and is derived from proceeds traceable to the offense, as provided in Title 18, United States Code, Section

981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

2. The property to be forfeited includes, but is not limited to, a personal money judgment in the amount of approximately \$78,666.

3. If any of the property described above, as a result of any act or omission by defendant cannot: be located upon the exercise of due diligence; has been transferred to, sold to, or deposited with a third person; has been placed beyond the jurisdiction of the court; has been substantially diminished in value; or has been commingled with other property that cannot be subdivided without difficulty; the United States of America shall be entitled to forfeiture of substitute property as provided in Title 21, United States Code, Section 853(p).

A TRUE BILL:

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FOREPERSON

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UNITED STATES ATTORNEY