

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA	:	Hon.
	:	
v.	:	Criminal No. 18-
	:	
SALOMÉ WOOLFORD	:	18 U.S.C. § 1349
	:	26 U.S.C. § 7206(1)
	:	

I N F O R M A T I O N

The defendant having waived in open court prosecution by indictment, the United States Attorney for the District of New Jersey, charges:

1. At all times relevant to this Information:
  - a. Defendant SALOMÉ WOOLFORD was a resident of New Jersey, and an employee of the Victim Company.
  - b. The "Victim Company" was an insurance provider headquartered in Warren, New Jersey.
  - c. The Victim Company's computer servers were located in Raleigh, North Carolina.
  - d. The Internal Revenue Service, an agency of the United States within the Department of the Treasury, was responsible for administering and enforcing the tax laws of the United States, specifically, as relevant here, federal income tax laws.

**COUNT ONE**  
**(Wire Fraud Conspiracy)**

2. From in or about May 2013 through in or about April 2015, in the District of New Jersey and elsewhere, defendant

## **SALOMÉ WOOLFORD**

did knowingly and intentionally conspire and agree with others to devise a scheme and artifice to defraud the Victim Company, and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, and for the purpose of executing such scheme and artifice to defraud, did transmit and cause to be transmitted by means of wire communications in interstate and foreign commerce, certain writings, signs, signals, pictures, and sounds, contrary to Title 18, United States Code, Section 1343.

### **OBJECT OF THE CONSPIRACY**

3. It was the object of the conspiracy for defendant SALOMÉ WOOLFORD and others to obtain money and property from the Victim Company by, among other things, accessing customer accounts, altering payee information, directing insurance refund checks to be issued in the name of their criminal associates, and splitting the proceeds of payments made by the Victim Company as a result.

### **MANNER AND MEANS OF THE CONSPIRACY**

4. It was part of the conspiracy that defendant SALOMÉ WOOLFORD and co-conspirators accessed the Victim Company's internal computer system and identified customer accounts with credit balances where insurance refund checks had been mailed to the customers, but the checks had not yet been cashed or, in some instances, the checks had been returned to the Victim Company uncashed.

5. It was further part of the conspiracy that defendant SALOMÉ WOOLFORD and co-conspirators then changed the payee names and addresses of the Victim Company customers to the names and addresses of their criminal associates, and caused the Victim Company to reissue the refund checks in the name of these criminal associates.

6. It was further part of the conspiracy that each time that defendant SALOMÉ WOOLFORD and co-conspirators made a change in the Victim Company's electronic records, their actions resulted in the transmission, in interstate commerce, of writings, signs, and signals from New Jersey to servers located in Raleigh, North Carolina.

7. It was further part of the conspiracy that once the refund checks had been delivered to and cashed by their criminal associates, defendant SALOMÉ WOOLFORD and co-conspirators received a portion of the proceeds.

8. It was further part of the conspiracy that to conceal the fraud, once the new checks were mailed and received by their criminal associates, defendant SALOMÉ WOOLFORD and co-conspirators deleted the fraudulent alternate payee information from the Victim Company's computer system.

9. As a result of the scheme, the Victim Company suffered losses of at least \$300,000.

All in violation of Title 18, United States Code, Section 1349.

**COUNT TWO**  
**(Filing False Personal Income Tax Return)**

10. The allegations set forth in Paragraph 1 and Paragraphs 3 through 8 of Count One of this Information are realleged and incorporated as though fully set forth in this paragraph.

11. On or about the 15<sup>th</sup> day of April, 2015, in the District of New Jersey and elsewhere, defendant

**SALOMÉ WOOLFORD**

did knowingly and willfully make and subscribe a U.S. Individual Income Tax Return, Form 1040, corresponding to tax year 2014, which was verified by a written declaration that it was made under the penalties of perjury and was filed with the Internal Revenue Service, which said U.S. Individual Income Tax Return SALOMÉ WOOLFORD did not believe to be true and correct as to every material matter, in that the said U.S. Individual Income Tax Return Form 1040 reported "Adjusted Gross Income" (AGI) of sixty thousand, four hundred forty-one dollars (\$60,441), whereas, she then and there well knew and believed she had an additional AGI of at least one hundred fifty-five, five hundred ninety-one dollars (\$155,591) that was not reported on said return.

In violation of Title 26, United States Code, Section 7206(1).

## **FORFEITURE ALLEGATION AS TO COUNT ONE**

1. The allegations contained in this Information are incorporated by reference as though set forth in full herein for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461.

2. Upon conviction of the offenses charged in Count One this Information, the government will seek forfeiture from defendant SALOMÉ WOOLFORD, in accordance with Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), of any and all property, real or personal, that constitutes or is derived from proceeds traceable to the violation of Title 18, United States Code, Section 1349 alleged in Count One this Information, including but not limited to a sum of money equal to at least \$50,000 in United States currency.

3. If by any act or omission of defendant SALOMÉ WOOLFORD any of the property subject to forfeiture herein:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty,

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of defendant SALOMÉ WOOLFORD up to the value of the property described in this forfeiture allegation.

  
CRAIG CARPENITO  
United States Attorney

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26 U.S.C. § 7206(1)

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**CRAIG CARPENITO**

*U.S. ATTORNEY  
NEWARK, NEW JERSEY*

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