

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

**UNITED STATES OF AMERICA** : **Criminal Number: 20-**  
 :  
 **v.** :  
 : **18 U.S.C. § 1341**  
**ROBERT S. ARMSTRONG** :

**INFORMATION**

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

**The Defendant**

1. At all times relevant to this Information and in furtherance of his scheme and artifice to defraud:
  - a. Defendant ROBERT S. ARMSTRONG operated a business named Pinnacle Medical Supply in Gloucester County, New Jersey.
  - b. Defendant ROBERT S. ARMSTRONG rented and maintained control over numerous mail boxes at Commercial Mail Receiving Agents (“CMRA’s”), including four mail boxes located in Sewell, New Jersey, Melbourne, Florida, Houston, Texas, and Dallas, Texas.
  - c. Defendant ROBERT S. ARMSTRONG opened and maintained control of a bank account at Parke Bank, account number XXXXXX2801 in the name of Pinnacle Medical Supply.

**The Object of the Scheme and Artifice**

2. From in or about February 2019, through on or about June 18, 2019, in Gloucester County, in the District of New Jersey and elsewhere, defendant

ROBERT S. ARMSTRONG

did knowingly and intentionally devise a scheme and artifice to defraud and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, which scheme and artifice was in substance as set for below.

**The Object of the Scheme and Artifice**

3. The object of the scheme and artifice to defraud was for defendant ROBERT S. ARMSTRONG to obtain money from doctors' offices, medical clinics and hospitals throughout the United States (hereinafter, the "Medical Providers") by issuing false and fraudulent invoices to the Medical Providers for medical supplies and other materials, including but not limited to diabetic test strips, EpiPens® and sanitizing wipes (hereinafter, "medical supplies"), which had never been ordered or received by the Medical Providers.

**The Defendant's Scheme**

4. As part of the scheme to defraud, defendant ROBERT S. ARMSTRONG prepared invoices which sought payment in amounts such as \$252, \$240 and \$282 for medical supplies which the Medical Providers had neither ordered nor received. The invoices contained false and fraudulent information including but not limited to a demand for payment for medical supplies which had neither been ordered nor received by the Medical Providers, fraudulent shipping information pertaining to the medical supplies and a fraudulent address.
5. It was further part of the scheme and artifice to defraud that defendant ROBERT S. ARMSTRONG contracted with a bulk mailing company to mail via U.S. Mail the fraudulent invoices to thousands of Medical Providers throughout the United States.
6. It was further part of the scheme and artifice to defraud that defendant ROBERT S.

ARMSTRONG caused the invoices to contain return envelopes bearing the address of either of the two CMRAs in Melbourne, Florida or Dallas, Texas to induce the Medical Providers to mail payments for the non-existent medical supplies to defendant ROBERT S. ARMSTRONG.

7. It was further part of the scheme and artifice to defraud that defendant ROBERT S. ARMSTRONG caused the CMRAs in Melbourne, Florida and Dallas, Texas to forward the mail he received – which included the Medical Providers’ checks – to New Jersey. Specifically, defendant ROBERT S. ARMSTRONG instructed employees at both the Melbourne and Dallas CMRAs to forward all of the mail he received at that CMRA to his mother’s residence in New Jersey on a weekly basis.
8. It was further part of the scheme and artifice to defraud that defendant ROBERT S. ARMSTRONG received checks from the Medical Providers and at times deposited and caused to be deposited such checks into the Pinnacle Medical Supply bank account. As of December 16, 2019, approximately 943 Medical Providers from 47 states and the District of Columbia sent checks to Pinnacle Medical Supply totaling approximately \$214,495.06. Of those checks, defendant ROBERT S. ARMSTRONG deposited or caused to be deposited approximately \$59,389.06 from 240 Medical Providers into his Pinnacle Medical Supply account at Parke Bank. Law enforcement officers disrupted defendant ROBERT S. ARMSTRONG’S scheme before he was able to deposit the remaining checks.

**The Defendant’s Fraud on Medical Provider 1**

9. It was further part of the scheme and artifice to defraud that defendant ROBERT S. ARMSTRONG mailed and caused to be mailed a fraudulent invoice to Medical Provider 1, a hospital located in Pennsylvania, which is part of health network consisting of numerous hospitals and urgent care centers, demanding payment in the amount of \$282 for medical supplies, that is, a two-pack of EpiPens®, which were neither ordered nor received by

Medical Provider 1.

10. The invoice defendant ROBERT S. ARMSTRONG mailed and caused to be mailed to Medical Provider 1 was fraudulent in that it alleged that Medical Provider 1 had ordered the EpiPens®, and that Pinnacle Medical Supply had filled that order; specifically, that Pinnacle Medical Supply shipped the EpiPens® to Medical Provider 1 via U.S. Mail shipped on January 28, 2019 pursuant to tracking number X3770, and that the EpiPens® were received by Medical Provider 1 on January 30, 2019 at 4:11 p.m.
11. In response to that fraudulent invoice, on or about March 7, 2019, Medical Provider 1 issued a check, check number 109548, in the amount of \$282, payable to Pinnacle Medical Supply. As intended by defendant ROBERT S. ARMSTRONG, Medical Provider 1 mailed that check from Bethlehem, Pennsylvania to Pinnacle Medical Supply at the Melbourne, Florida mail box via U.S. Mail.
12. On or about April 2, 2019, defendant ROBERT S. ARMSTRONG deposited Medical Provider 1's check for \$282 into his Pinnacle Medical Supply account at Parke Bank.
13. As instructed by defendant ROBERT S. ARMSTRONG, the CMRA in Melbourne, Florida, mailed Medical Provider 1's check to defendant ROBERT S. ARMSTRONG's mother's residence in Gloucester County, New Jersey, on a date between on or about March 7, 2019 and April 2, 2019.

**The Mail Fraud**

14. Between on or about March 7, 2019 and April 2, 2019, for the purpose of executing the aforesaid scheme and artifice, in Gloucester County, in the District of New Jersey and elsewhere, the defendant,

ROBERT S. ARMSTRONG,

did knowingly and with fraudulent intent cause to be placed in a post office and authorized depository for mail, and cause to be delivered in accordance with the directions thereon,

certain mail matter, that is, a check issued by Medical Provider 1 in the amount of \$282, to be sent and delivered by the United States Postal Service or by a private or commercial interstate carrier for the purpose of executing such scheme and artifice.

All in violation of Title 18, United States Code, Section 1341.

  
CRAIG CARPENITO  
United States Attorney

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