

**UNITED STATES DISTRICT COURT  
DISTRICT OF RHODE ISLAND**

**UNITED STATES OF AMERICA**

:

:

**CRIMINAL NO.**

**v.**

:

:

**In violation of**

**PAUL SPREMULLI**

:

**18 U.S.C. § 1343**

:

**Defendant**

:

**CR 15**

**37ML**

**INFORMATION**

The United States Attorney charges that:

**INTRODUCTION**

At all times material to these charges:

1. The State of Rhode Island Department of Labor and Training (RIDLT) operated the State of Rhode Island unemployment insurance program. This program provided benefits to persons out of work through no fault of their own.

2. The State of Rhode Island Temporary Disability Insurance benefits program (TDI) provides benefit payments to insured Rhode Island workers for weeks of unemployment caused by temporary disability or injury. The TDI program is also administered by RIDLT.

3. To receive unemployment insurance (UI) benefits, an unemployed worker had to file a claim, either telephonically or on the Internet with RIDLT ([uiclaims.ri.gov](http://uiclaims.ri.gov)). The claim would include information on the claimant's last employer and the reason for the separation. If the claim is approved, the worker would receive UI benefits paid through direct deposit into one's bank account or an electronic payment card (EPC). In order to receive continuing benefits each week thereafter, the worker was required to telephonically contact RIDLT, identify himself through the use of his four-digit Personal Identification Number (PIN), and certify whether he

had worked and received any earnings during the weekly period. The worker also had to certify whether he was able and available for work and looking for work. If the certification was accepted, a weekly UI payment was issued through direct deposit into the worker's bank account or on an EPC.

4. RIDLT relied upon the worker's answers in the weekly certification in determining whether the worker was eligible to continue receiving benefits.

5. An eligible worker could receive up to 26 weeks of state funded benefits. The Federal government also funded the administrative costs incurred by RIDLT. After the initial benefit period, a worker could receive extended unemployment benefits funded by the federal government. In February 2009, Congress passed the American Reinvestment and Recovery Act which contributed additional federal funds for unemployment benefits.

6. To receive TDI benefits, an ill or injured worker had to file a claim, on the Internet with RIDLT ([www.dlt.ri.gov/t di](http://www.dlt.ri.gov/t di)) or by download or requesting an application and mailing it in to RIDLT. To be eligible for TDI, the worker must have been unable to work for seven consecutive days due to illness, surgery, or injury and have earned a certain amount in income in the months preceding his claim.

7. The claim would include information on the claimant's injury or illness and the first day he was unable to work due to his illness or injury. If the claim was approved, the worker would receive his TDI benefits either by direct deposit into his bank account or by EPC containing a dollar amount equal to the amount of TDI benefits due to the worker. A worker may claim TDI for up to 30 weeks, as long as he meets the eligibility criteria to continue receiving the benefits.

8. The defendant PAUL SPREMULLI was a resident of Coventry, Rhode Island and was employed by PKS Associates, Inc. and Temp Depot, Inc. Both agencies were temporary employment agencies incorporated in Rhode Island of which the defendant was the president and owner.

**SCHEME AND ARTIFICE TO DEFRAUD**

9. The United States Attorney realleges and incorporates by reference paragraphs 1 through 8 of this Information as though fully set forth herein.

10. From on or about February 11, 2008, and continuing through on or about May 4, 2013, in the District of Rhode Island and elsewhere, defendant PAUL SPREMULLI knowingly executed and attempted to execute a scheme and artifice to defraud the RIDLT and for obtaining money and property of RIDLT, specifically TDI and UI benefits in the approximate amount of \$63,789, by means of false and fraudulent pretenses, representations, and promises.

**OBJECT OF THE SCHEME AND ARTIFICE TO DEFRAUD**

11. It was the object of the scheme and artifice to defraud RIDLT of TDI and UI benefits in the approximate amount of \$63,789, by claiming that the defendant PAUL SPREMULLI was unemployed due to being laid off or unable to work due to injury or illness.

**MANNER AND MEANS**

12. It was part of the scheme and artifice to defraud that on or about February 11, 2008, defendant PAUL SPREMULLI filed an application for TDI with RIDLT falsely claiming that he was injured and unable to work.

13. It was further part of the scheme and artifice to defraud that on or about November 19, 2009, defendant PAUL SPREMULLI filed an application for UI benefits falsely claiming that he had been laid off from his employment with PKS Associates.

14. It was further part of the scheme and artifice to defraud that on or about February 19, 2013, defendant PAUL SPREMULLI filed an application for TDI with RIDLT falsely claiming that he was injured and unable to work.

15. It was further part of the scheme and artifice to defraud that defendant PAUL SPREMULLI filed each of his applications for TDI and UI benefits intending to continue working and did in fact remain employed by, and working for, PKS Associates and Temp Depot throughout the period of time he was collecting benefits.

16. It was further part of the scheme to defraud that after filing each of his applications for UI, the defendant PAUL SPREMULLI falsely certified each week that he was not working, was able and available for work, and was looking for work.

17. It was further part of the scheme to defraud that after filing for and beginning to receive TDI benefits each time, PAUL SPREMULLI never reported to RIDLT that he had continued to work.

18. It was further part of the scheme to defraud, that from on or about February 11, 2008, continuing through September 6, 2008, the defendant PAUL SPREMULLI, while employed and working for PKS Associates and Temp Depot, fraudulently obtained and stole TDI benefits totaling approximately \$22,381, to which he was not entitled because he was working full-time.

19. It was further part of the scheme to defraud, that from on or about November 19, 2009, continuing through December 4, 2010, the defendant PAUL SPREMULLI, while employed and working for PKS Associates and Temp Depot, fraudulently obtained and stole UI benefits totaling approximately \$32,994, to which he was not entitled because he was working full-time.

20. It was further part of the scheme to defraud, that from on or about February 19, 2013, continuing through May 4, 2013, the defendant PAUL SPREMULLI, while employed and working for PKS Associates and Temp Depot, fraudulently obtained and stole TDI benefits totaling approximately \$8,414 to which he was not entitled because he was working full-time.


**EXECUTION OF THE SCHEME**

21. On or about August 17, 2010, in the District of Rhode Island and elsewhere, the defendant PAUL SPREMULLI, for the purpose of executing aforesaid scheme and artifice to defraud and to obtain money and property by means of materially false and fraudulent pretenses, representations and promises, knowingly transmitted and caused to be transmitted by means of wire communication in interstate commerce from the RI Unemployment Insurance Trust Fund, an amount of \$523.00 to PAUL SPREMULLI'S bank account at Citizens Bank, account #- - -3043.

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

PETER F. NERONHA  
United States Attorney

By:   
DULCE DONOVAN  
Assistant United States Attorney

  
ADI GOLDSTEIN  
Assistant United States Attorney  
Chief, Criminal Division

DATED: APRIL 17, 2015

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT

BY: ☒ INFORMATION ☐ INDICTMENT ☐ COMPLAINT

CASE NO.

Matter Sealed: ☐ Juvenile ☐ Other than Juvenile

☐ Pre-Indictment Plea ☐ Superseding ☐ Defendant Added  
☐ Indictment ☐ Charges/Counts Added  
☐ Information

Name of District Court, and/or Judge/Magistrate Location (City)

UNITED STATES DISTRICT COURT RHODE ISLAND  
DISTRICT OF RHODE ISLAND Divisional Office

Name and Office of Person PETER F. NERONHA  
Furnishing Information on ☒ U.S. Atty ☐ Other U.S. Agency  
THIS FORM Phone No. (401) 709-5058

Name of Asst. DULCE DONOVAN  
U.S. Attorney  
(if assigned)

PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)  
U.S. Department of Labor and Training

☐ person is awaiting trial in another Federal or State Court  
(give name of court)

☐ this person/proceeding transferred from another district  
per (circle one) FRCrP 20, 21 or 40. Show District

☐ this is a reprosecution of charges  
previously dismissed which were  
dismissed on motion of:

☐ U.S. Atty ☐ Defense

☐ this prosecution relates to a  
pending case involving this same  
defendant. (Notice of Related  
Case must still be filed with the  
Clerk.)

☐ prior proceedings or appearance(s)  
before U.S. Magistrate Judge  
regarding this defendant were  
recorded under

SHOW  
DOCKET NO.

MAG. JUDGE  
CASE NO.

Place of RHODE ISLAND  
offense

County

USA vs.

Defendant: Paul Spremulli

**REDACTED**

Alien  
applicable)

Issue: ☐ Warrant ☒ Summons

Location Status:

Arrest Date \_\_\_\_\_ or Date Transferred to Federal Custody \_\_\_\_\_

☐ Currently in Federal Custody

☐ Currently in State Custody

☐ Writ Required

☐ Currently on bond

☐ Fugitive

Defense Counsel (if any): John R. Grasso

☐ FPD ☐ CJA ☐ RET'D

☐ Appointed on Target Letter

☐ This report amends AO 257 previously submitted

OFFENSE CHARGED - U.S.C. CITATION - STATUTORY MAXIMUM PENALTIES - ADDITIONAL INFORMATION OR COMMENTS

Total # of Counts 1

Set	Title & Section/Offense Level (Petty = 1 / Misdemeanor = 3 / Felony = 4)	Description of Offense Charged	Felony/Misd.
1	18 U.S.C. § 1343	Wire Fraud	<input checked="" type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor
Max	Penalties: 20 years imprisonment; \$250,000	fine; 3 years S/R; and \$100 assessment.	<input type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor
			<input type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor
			<input type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor
		Estimated Trial Days: 3	<input type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor