

UNITED STATES DISTRICT COURT  
DISTRICT OF RHODE ISLAND

UNITED STATES OF AMERICA

v.

JAMEL NEWMAN,  
RASHAAD HILL, and  
DARREN ROBINSON,

Defendants.

CR 21- 108JJM

Cr. No.

In violation of 18 U.S.C. § 1349  
(Conspiracy to Commit Wire  
Fraud); 18 U.S.C. § 1343 (Wire  
Fraud); 18 U.S.C. § 641 (Theft of  
Government Money); 18 U.S.C.  
§ 1028 (Aggravated Identity Theft);  
and 18 U.S.C. § 922(g)(9)  
(Possession of Firearm by  
Prohibited Person)

Forfeiture

INDICTMENT

The Grand Jury charges that:

COUNT ONE

(Conspiracy to Commit Wire Fraud - 18 U.S.C. § 1349)

Introduction

At all times relevant to this Indictment:

1. Defendants JAMEL NEWMAN, DARREN ROBINSON, and RASHAAD HILL each resided in Rhode Island.
2. The Unemployment Insurance Program ("UI Program") was a joint federal-state partnership administered on behalf of the U.S. Department of Labor by agencies in each state. In Rhode Island, the UI Program was administered by the Rhode Island Department of Labor and Training (RIDLT). In California, Arizona, Nevada, and Massachusetts, the UI Programs were administered by the California Employment

Development Department (CAEDD), the Arizona Department of Economic Security (AZDES), the Nevada Department of Employment, Training and Rehabilitation (NVDETR), and the Massachusetts Department of Unemployment Assistance (MADUA), respectively.

3. In March 2020, the Families First Coronavirus Response Act (FFCRA) and Coronavirus Aid, Relief, and Economic Security (CARES) Act provided additional funding for state UI agencies to respond to the COVID-19 pandemic. The CARES Act allowed states to expand the scope of workers who were eligible to receive state UI benefits, to extend the period of time for which workers could be eligible for UI benefits, and to allow workers who may have exhausted UI benefits under traditional programs to receive benefits. The CARES Act further expanded the ability of states to provide benefits to unemployed workers by creating three new unemployment programs, namely, the Pandemic Unemployment Assistance (PUA) program, which permitted states to provide benefits to individuals who were self-employed, seeking part-time employment, or otherwise would not qualify for regular unemployment benefits, the Federal Pandemic Unemployment Compensation (FPUC) program, which provided an additional benefit, initially in the amount of \$600 and later, in the amount of \$300, in federal benefits to individuals collecting traditional UI program benefits, and the Pandemic Emergency Unemployment Compensation (PEUC) program, which provided additional weeks of benefits for individuals who had otherwise exhausted their entitlement to regular UI benefits (collectively referred to herein as “expanded pandemic UI benefits”) PUA and FPUC benefits were 100% federally funded benefits

paid through state UI agencies.

4. To receive regular UI and expanded pandemic UI benefits from a state UI agency, an applicant could file a claim, via the internet, with the state UI agency from which he was eligible to seek benefits or could file an application by downloading or requesting an application and mailing it into the state UI agency. An applicant was not permitted to seek regular UI and expanded pandemic UI benefits and expanded pandemic UI benefits in more than one state at the same time.

The Conspiracy

5. Beginning on a date unknown to the Grand Jury but not later than in or about April 2020 and continuing through in or about December 2020, in the District of Rhode Island and elsewhere, the Defendants,

**JAMEL NEWMAN,  
RASHAAD HILL, and  
DARREN ROBINSON,**

did knowingly, willfully, and unlawfully combine, conspire, and agree with each other and other persons, known and unknown to the Grand Jury, to commit wire fraud, contrary to 18 U.S.C. § 1343, that is, did knowingly and with intent to defraud, devise and intend to devise a scheme to defraud and to obtain money from multiple state UI agencies, by means of materially false and fraudulent pretenses, representations, and promises, knowing that they were false and fraudulent when made, through the transmission in interstate commerce of wire communications.



### **The Object of the Conspiracy**

6. The object of the conspiracy was for the Defendants to unlawfully enrich themselves by filing claims for regular UI and expanded pandemic UI benefits with RIDLT, and while seeking and receiving benefit payments from RIDLT, filing applications for benefits with other state UI agencies in their names and the names of other persons, and in those applications submitted to other state UI agencies, falsely claiming that the applicant had resided and worked in states other than Rhode Island and was eligible for regular UI benefits and expanded pandemic UI benefits in those states.

### **Manner and Means of the Conspiracy**

7. Beginning in or about April 2020 and continuing through in or about December 2020, the Defendants, NEWMAN, HILL, and ROBINSON, engaged in communications relating to the filing of on-line applications for regular UI and expanded pandemic UI benefits in Rhode Island, and in states outside of Rhode Island, and filed applications for such benefits in their own names, and in the names of other individuals.

### **Acts in Furtherance of the Conspiracy**

8. On or about April 8, 2020 and April 30, 2020, NEWMAN filed an application with RIDLT for expanded pandemic UI benefits. NEWMAN refiled for benefits with RIDLT on or about September 15, 2020 and September 23, 2020. On his applications, NEWMAN listed a phone number of 401-XXX-4202.

9. On or about August 23, 2021, HILL filed a claim with RIDLT for UI

benefits, and listed his address as XX Ellery Street, Providence, RI, and his phone number as 401-XXX-1493.

10. It was further part of the scheme and artifice to defraud that Defendants NEWMAN, ROBINSON, and HILL began filing fraudulent applications to obtain regular UI and expanded pandemic UI benefits in other states outside of Rhode Island, including the following applications, and exchanged text messages about applications to various state UI agencies:

- a. On or about April 30, 2020, NEWMAN filed an application for expanded pandemic UI benefits with MADUA, falsely claiming that he had worked in Massachusetts and had been self-employed.
- b. On or about May 1, 2020, HILL filed an application for regular and expanded pandemic benefits with MADUA.
- c. On or about May 2, 2020, NEWMAN and HILL exchanged text messages about payment dates for MADUA claims.
- d. On or about May 10, 2020, ROBINSON filed an application for expanded pandemic UI benefits with MADUA.
- e. On or about May 15, 2020, an application was filed with MADUA in the name of P.G., listing a phone number, 401-XXX-4202, which was used by NEWMAN on claims filed in his name.
- f. On or about June 16, 2020, NEWMAN filed an application for expanded pandemic UI benefits with AZDES, falsely claiming that he had worked in Arizona and was self-employed with "Sideline business" and



provided an Arizona mailing and residential addresses.

- g. On or about June 18, 2020, HILL filed an application for expanded pandemic UI benefits with AZDES, falsely claiming that he had worked in Arizona and was self-employed with a "Sideline business" and provided an Arizona residential addresses.
- h. On or about June 18, 2020, HILL and NEWMAN exchanged text messages in which they shared personal identifying information (PII) of N.M.
- i. On or about June 18, 2020, HILL attempted to file an online application with AZDES in the name of N.M, recorded his online efforts to file the application, and discussed the application with NEWMAN via text messages. The application filed in the name of N.M. listed an address of XX 86 Ellery Street, Providence, Rhode Island, and a phone number of 401-XXX-1493, an address and phone number, respectively, listed on claims filed by HILL in his name.
- j. On or about June 21, 2020, an application was filed with AZDES in the name of K.J., and payments were made to a Sutton Bank account in ROBINSON's name.
- k. On or about June 25, 2020, NEWMAN and HILL exchanged text messages in which NEWMAN sent HILL a screen shot of an AZDES benefit summary pages and discussed when the benefits would be paid.
- l. On or about June 25, 2020, ROBINSON and HILL exchanged text

messages in which ROBINSON sent HILL a screen shot of an AZDES benefit summary pages and discussed what ROBINSON should enter on the online application form. HILL stated that he was "waiting for Melz to send" him information.

- m. On or about June 25, 2020, ROBINSON filed an application with AZDES, falsely claiming that he had worked for all of 2019 in Arizona and provided an Arizona residential address.
- n. On or about June 30, 2020, HILL and ROBINSON exchanged text messages in which they discussed filing UI claims and which states were paying on claims.
- o. On or about July 1, 2020, NEWMAN and HILL exchanged text messages about occupations to list in Nevada applications.
- p. On or about July 1, 2020, HILL filed an application for PUA benefits with NVDETR.
- q. On or about July 15, 2020, HILL and NEWMAN exchanged text messages and exchanged PII of R.W.
- r. On or about July 22, 2020, an application was filed with CAEDD for R.W., listing an address of XX Ellery Street, Providence, RI, an address used by HILL in filing claims in his name.
- s. On or about July 17, 2020, NEWMAN filed an application for expanded pandemic UI benefits with CAEDD, falsely claiming that he worked in California.

- t. On or about July 20, 2020, HILL filed an application for expanded pandemic UI benefits with CA EDD, false claiming that he worked in California.
- u. On or about July 23, 2020, HILL and ROBINSON exchanged text messages in which HILL stated that he would be filing an application and would record his screen to show ROBINSON, and ROBINSON responded to send the video via Snapchat to prevent a "paper trail;"
- v. On or about July 24, 2020, ROBINSON filed an application for expanded pandemic benefits with CAEDD, falsely claiming that he had worked in customer service and as a nail technician in California.
- w. On or about July 26, 2020, NEWMAN made cash advance withdrawals, using a debit card issued by CAEDD at the Twin Rivers Casino, Lincoln, Rhode Island.
- x. On or about July 27, 2020, HILL and ROBINSON exchanged text messages discussing how to file an application with CAEDD.
- y. On or about July 29, 2020, HILL and ROBINSON exchanged text messages discussing that ROBINSON had filed a Nevada application, and that it had been rejected.
- z. On or about October 24, 2020, HILL and NEWMAN exchanged text messages and exchanged PII of R.C.
- aa. On or about November 18, 2020, NEWMAN and HILL exchanged text messages regarding logging into the AZDES website and discussed



checking what they with "Darren."

bb. On or about November 18, 2020, ROBINSON and HILL exchanged text messages in which ROBINSON informed HILL that he had been paid by Arizona.

cc. On or about December 24, 2020, NEWMAN and HILL exchanged text messages with a screenshot of an order for a fake California license in the name of an individual, R.C.

All in violation of 18 U.S.C. § 1349.

**COUNTS TWO - TEN**

(18 U.S.C. § 1343 – Wire Fraud)

11. The allegations contained in paragraphs 1 through 10 of this Indictment are re-alleged and incorporated by reference as though fully set forth herein.

**Scheme to Defraud and to Obtain Monies**

12. From at least in or about April 2020, and continuing until in or about December 2020 in the District of Rhode Island and elsewhere,

**JAMEL NEWMAN,  
RASHAAD HILL, and  
DARREN ROBINSON,**

attempted to commit and did commit wire fraud, that is, did knowingly and with intent to defraud, devise and intend to devise a scheme to defraud and to obtain money from multiple state UI agencies, by means of materially false and fraudulent pretenses, representations, and promises, knowing that they were false and fraudulent when made, through the transmission in interstate commerce of wire communications.

**The Object of the Scheme to Defraud and to Obtain Monies**

13. The object of the scheme was the same as the object of the conspiracy to commit wire fraud. Accordingly, paragraph 6, is re-alleged and incorporated herein by reference as though fully set forth herein.

**Manner and Means of the Scheme to Defraud and to Obtain Monies**

14. The manner and means of the scheme to defraud were the same as the manner and means of the conspiracy to commit mail fraud. Accordingly, paragraph 7 is re-alleged and incorporated by reference as though fully set forth herein.

**Execution of the Scheme to Defraud and to Obtain Monies**

15. On or about the dates listed below, in the District of Rhode Island and elsewhere, for the purpose of executing aforesaid scheme and artifice to defraud and to obtain money, and attempting to do so, knowingly transmitted and caused to be transmitted by means of wire communication in interstate commerce to wit, using a device accessing the internet, the filing of an online application for regular UI and expanded pandemic UI benefits from the below listed state UI agencies, each application constituting a separate count, as more particularly described below:

Count	Defendant	Date of Application	State UI Agency
2	NEWMAN	April 30, 2020	MADUA
3	ROBINSON	May 10, 2020	MADUA
4	NEWMAN	June 16, 2020	AZDES
5	HILL	June 18, 2020	AZDES
6	ROBINSON	June 25, 200	AZDES
7	HILL	July 1, 2020	NVDETR
8	NEWMAN	July 17, 2020	CAEDD
9	HILL	July 20, 2020	CAEDD
10	ROBINSON	July 24, 2020	CAEDD

All in violation of 18 U.S.C. § 1343.

**COUNT ELEVEN**

(Aggravated Identity Theft - 18 U.S.C. §§ 1028A, 2)

16. The allegations contained in paragraphs 1 through 10 of this Indictment are re-alleged and incorporated by reference as though fully set forth herein.

17. On or about May 15, 2020, in the District of Rhode Island and elsewhere, defendant,

**JAMEL NEWMAN,**

did knowingly transfer, possess, and use, without lawful authority, a means of identification of another person, to wit the name and social security number of P.G., during and in relation to a felony violation enumerated in 18 U.S.C. § 1028A(c), to wit, conspiracy to commit wire fraud, in violation of 18 U.S.C. § 1349 and 18 U.S.C. § 1343, knowing that the means of identification belonged to another actual person.

All in violation of 18 U.S.C. §§ 1028A(a)(1) and 2.

**COUNT TWELVE**

(Aggravated Identity Theft - 18 U.S.C. §§ 1028A, 2)

18. The allegations contained in paragraphs 1 through 10 of this Indictment are re-alleged and incorporated by reference as though fully set forth herein.

19. On or about June 18, 2020, in the District of Rhode Island and elsewhere, Defendants,



**RASHAAD HILL and  
JAMEL NEWMAN,**

did knowingly transfer, possess, and use, without lawful authority, a means of identification of another person, to wit the name and social security number of N.M., during and in relation to a felony violation enumerated in 18 U.S.C. § 1028A(c), to wit, conspiracy to commit wire fraud, in violation of 18 U.S.C. § 1349 and 18 U.S.C. § 1343, knowing that the means of identification belonged to another actual person.

All in violation of 18 U.S.C. §§ 1028A(a)(1) and 2, and *Pinkerton v. United States*, 328 U.S. 640 (1946).

**COUNT THIRTEEN**

(Aggravated Identity Theft - 18 U.S.C. §§ 1028A, 2)

20. The allegations contained in paragraphs 1 through 10 of this Indictment are re-alleged and incorporated by reference as though fully set forth herein.

21. Beginning on or about July 15, 2020 and continuing through July 22, 2020, in the District of Rhode Island and elsewhere, Defendant,

**RASHAAD HILL and  
JAMEL NEWMAN,**

did knowingly transfer, possess, and use, without lawful authority, a means of identification of another person, to wit the name and social security number of R.W., during and in relation to a felony violation enumerated in 18 U.S.C. § 1028A(c), to wit, conspiracy to commit wire fraud, in violation of 18 U.S.C. § 1349 and 18 U.S.C. § 1343, knowing that the means of identification belonged to another actual person.

All in violation of 18 U.S.C. §§ 1028A(a)(1) and 2, and *Pinkerton v. United States*, 328 U.S. 640 (1946).

**COUNT FOURTEEN**

(Aggravated Identity Theft - 18 U.S.C. §§ 1028A, 2)

22. The allegations contained in paragraphs 1 through 10 of this Indictment are re-alleged and incorporated by reference as though fully set forth herein.

23. On or about June 12, 2020, in the District of Rhode Island and elsewhere, defendants,

**DARREN ROBINSON,**

did knowingly transfer, possess, and use, without lawful authority, a means of identification of another person, to wit the name and social security number of K.J., during and in relation to a felony violation enumerated in 18 U.S.C. § 1028A(c), to wit, conspiracy to commit wire fraud, in violation of 18 U.S.C. § 1349 and 18 U.S.C. § 1343, knowing that the means of identification belonged to another actual person.

All in violation of 18 U.S.C. §§ 1028A(a)(1) and 2.

**COUNT FIFTEEN**

(Theft of Government Money - 18 U.S.C. § 641)

24. The allegations contained paragraphs 1 through 10 of this Indictment are re-alleged and incorporated by reference as though fully set forth herein.

25. From at least in or about April 2020, and continuing until in or about December 2020, in the District of Rhode Island and elsewhere, the Defendants,

**JAMEL NEWMAN,  
RASHAAD HILL, and  
DARREN ROBINSON,**

did willfully and knowingly attempt to and did steal and purloin money of the United States in an amount exceeding \$1,000, to wit, funds paid as expanded pandemic UI benefits, specifically, PUA and FPUC benefits.

All in violation of 18 U.S.C. § 641.

**COUNT SIXTEEN**

(Possession of Firearm by a Prohibited Person - 18 U.S.C. § 922(g)(9))

26. On or about April 6, 2021, in the District of Rhode Island, the Defendant,

**JAMEL NEWMAN,**

knowing that he had been previously convicted of a misdemeanor crime of domestic violence, to wit: Domestic Violence – Simple Assault and/or Battery on or about September 17, 2019 (Case No. 61-2019-09766) and Simple Assault on or about February 28, 2019 (Case No. P2-2018-03267A), did knowingly possess a firearm, a Glock 19 Gen 5 9x19mm semi-automatic pistol, S/N BHNZ980, containing 8 rounds of 9x19mm ammunition, said firearm and ammunition having been shipped and transported in interstate commerce.

All in violation of 18 U.S.C. § 922(g)(9).

**FIRST FORFEITURE ALLEGATION**

Upon conviction of any of the Conspiracy to Commit and Wire Fraud offenses alleged in Counts One through Ten of this Indictment, Defendants **JAMEL NEWMAN,**



**RASHAAD HILL**, and **DARREN ROBINSON** shall forfeit to the United States of America, pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), all right, title, and interest in any and all property, real or personal, which constitutes or is derived from proceeds traceable to a violation of 18 U.S.C. § 1343, including but not limited to the following:

A sum of money equal to the total amount of any property, real or personal, which constitutes or is derived from proceeds and/or traceable to a violation of 18 U.S.C. §§ 1343 or 1349.

If any of the above-described forfeitable property, as a result of any act or omission of the defendant, cannot be located upon the exercise of due diligence, has been transferred, sold to, or deposited with a third party, has been placed beyond the jurisdiction of the court, has been substantially diminished in value, or has been commingled with other property which cannot be divided without difficulty, it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), as incorporated by 28 U.S.C. § 2461(c), to seek forfeiture of any other property of said defendant up to the value of the forfeitable property described above.

All in accordance with 18 U.S.C. § 981(a)(1) as incorporated by 28 U.S.C. § 2461(c), and Rule 32.2(a), Federal Rules of Criminal Procedure.

SECOND FORFEITURE ALLEGATION



Upon conviction of Count Fifteen alleged in this Indictment, Defendant **JAMEL NEWMAN**, shall forfeit to the United States pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c), Glock 19 Gen 5 9x19mm semi-automatic pistol, containing 8 rounds of 9x19mm ammunition.

All in accordance with 18 U.S.C. § 924.

A TRUE BILL:

10-27-21

RICHARD B. MYRUS  
ACTING UNITED STATES ATTORNEY

  
\_\_\_\_\_  
DENISE MARIE BARTON  
G. MICHAEL SEAMAN  
STACEY P. VERONI  
Assistant U.S. Attorneys  
JOHN MOREIRA  
Special Assistant U.S. Attorney  
\_\_\_\_\_  
LEE H. VILKER  
Assistant U.S. Attorney  
Deputy Criminal Chief

Date: October 27, 2021