

IN THE COURT OF COMMON PLEAS OF PHILADELPHIA COUNTY

TRIAL DIVISION

IN RE : MISC. NO. 0003211-2007
COUNTY INVESTIGATING GRAND JURY XXII :
: C-6

PRESENTMENT

TO THE HONORABLE LILLIAN HARRIS RANSOM, SUPERVISING JUDGE OF
THE COUNTY INVESTIGATING GRAND JURY:

We, County Investigating Grand Jury XXII, were empanelled pursuant to the Act of November 22, 1978, Act. No. 1976-271, 42 Pa.C.S.A. §4541 et. seq. and charged to investigate allegations of illegal activities by customers, employees, and supervisory personnel of the Low Income Home Energy Assistance Program (LIHEAP) in Philadelphia and a related "Crisis" unit at the city's Department of Licenses and Inspection. In this investigation, we obtained information through statements and testimony from witnesses and from documentary evidence. As a result of our investigation, we have concluded from the evidence that there is probable cause to believe that from September 2003 through May 2007, LIHEAP and Crisis workers and co-conspirators ANTONIO OLIVENCIA, LINDSAY RICE, NORMA ORTOLAZA, CLARENCE MALONE, STACEY GRADDICK, KEVIN MCLEOD, YOLANDA KEITH, ROSLYN LEMAY, SHERYL ALLEN, CHARLOTTE IKARD, JOYCE MILLS, TYLENMA HOLMES, JOANNE BAKER, BARBARA REELS a/k/a BOBBY REELS, GLENDA LAWSON, JACQUELINE JACKSON, TIFFANEY PENDLETON, and CASSANDRA SHAMBERGER defrauded the Commonwealth of Pennsylvania and, ultimately, United States taxpayers, of nearly \$500,000.

INTRODUCTION

Each year the United States Government gives Pennsylvania more than \$120 million to assist its low-income residents with their heating bills. And each year the State allows its workers to steal that money with impunity. Between September 2003 and May 2007, in Philadelphia alone, a small group of state and city employees stole almost \$500,000 – most of it in just two heating seasons. The workers were able to do this with little risk or effort because their supervisors let them. One supervisor even ordered her subordinates to help her steal money from the heating assistance program. Others abetted the crimes by their willful blindness and obvious tolerance.

Workers trained each other to commit fraud by forging documents and falsifying social security numbers, incomes, and addresses – even creating wholly fictitious identities. They filled out and signed the fraudulent documents for each other, pretending to be applicants, employers, and landlords. Some skipped these burdensome steps and merely approved payments to people who never applied for assistance and often never existed.

Through these techniques, the workers supplied themselves, their friends, and their families with a stream of State checks, each for as much as \$818. Those who could not accomplish the scheme by themselves – because the computer access afforded to their position was limited – simply bribed co-workers to perform the fraudulent transactions for them. The workers offered the State's money to acquaintances who had no need of assistance with their heating bills, but who agreed to kickback a substantial payment to the workers. The fraud and thefts were so blatant and carried out on such a large scale, with so little effort to cover up, that anyone supervising or monitoring the program had to know what these workers were doing.

This presentment charges only the most egregious offenses. The Grand Jury believes that many more workers and much more money was involved. We do not think it coincidental that LIHEAP distributed cash benefits totaling \$936,608 in Philadelphia in 2004-2005 – the last full season before this investigation began – but *less than half that much*, \$454,956, in 2006-2007, after the workers were warned about the investigation. These numbers suggest that employees actually stole from LIHEAP at a rate of nearly half a million dollars *each season*. (See p. 15 for a fuller description of the criminal scheme.)

THE LIHEAP PROGRAM

The Low-Income Home Energy Assistance Program, or LIHEAP, is a federally funded initiative. Each year, the United States Congress appropriates money (almost \$2 billion in 2009) to enable states to help low-income households with heating costs. States are allotted money according to a formula, with larger, colder states such as Pennsylvania receiving proportionally more money than warmer or less populated ones. Pennsylvania's grant has grown from \$120 million in 2003 to \$135 million in 2009.

States submit plans to the federal government, detailing recipient eligibility requirements, benefit levels, and rules for administering the program, all of which are left to the states to determine. Once a state's plan is approved, funds are provided to the state to administer the program. In Pennsylvania, the Department of Public Welfare (DPW) administers the State's LIHEAP program. According to federal law, Pennsylvania is responsible for auditing and monitoring the State program to assure the proper disbursement of funds. (The Low-Income Home Energy Assistance Act, Pub. L. 97-35, §2605 (b)(10), as amended, 42 U.S.C.A. §§8624 (b)(10).)

Donna Roe, the Director of the Division of Federal Programs at DPW, explained Pennsylvania's LIHEAP program to the Grand Jury. Pennsylvania divides its annual LIHEAP grant into three categories of aid:

- (1) A **cash** component that provides cash payments to help eligible low-income households pay the costs of home heating. These cash payments are made directly, either to fuel vendors – for example, oil companies, Philadelphia Gas Works (PGW), and PECO – or to individuals if their fuel dealer does not participate in the program or if their heat costs are included in their rent. This component accounts for approximately 65 percent of the State's funding.
- (2) A **crisis** component that provides immediate assistance in cases where a household runs out of fuel or is at risk of shutoff by a utility and lacks the money necessary to pay its heating bill. This component accounts for approximately 10 percent of the State's funding.
- (3) A **weatherization** component that provides conservation and weatherization measures to help low-income households reduce the costs of home heating. This component accounts for about 15 percent of the State's funding.

In addition, 10 percent of the funding is allotted to cover administrative and planning costs.

DPW administers the LIHEAP program's cash and crisis components primarily through its 98 county assistance offices, which also administer other programs overseen by DPW, such as public assistance, food stamps, and Medicaid. (The weatherization program, which is not involved in this investigation, is managed by Pennsylvania's Department of Community and Economic Development.) In the case of larger cities such as Philadelphia, DPW sets up specialized LIHEAP units referred to as LIHEAP district offices.

PHILADELPHIA'S LIHEAP PROGRAM

Philadelphia's LIHEAP district office was located at 4601 Market Street for the time covered by this investigation – 2003 through 2007. The office employed approximately a hundred workers under the supervision of a district administrator. Some of these workers were hired seasonally and worked from November through May or June. The employees at the LIHEAP district office handled only the cash component of Philadelphia's LIHEAP program. In addition, DPW contracted out some of the tasks of administering the program's crisis component. Through 2007, Philadelphia's Department of Licenses and Inspections (L&I) was responsible for processing applications for the crisis program. In 2008, a nonprofit, Energy Coordinating Agency of Philadelphia, Inc., took over handling the crisis program.

The majority of the thefts discovered in this investigation occurred in the LIHEAP cash program and were perpetrated by workers at the LIHEAP district office. The district administrator from 2003 through 2007 was Marietta Moody. According to information provided to the Grand Jury, for the 2005-2006 heating season, Ms. Moody oversaw the following employees at the Market Street LIHEAP office:

- 2 assistant directors
- 7 supervisors of energy assistance workers
- 53 energy assistance workers (EAWs)
- 3 supervisors of clerical workers
- 22 clerical workers (CWs)
- 5 human service aides
- 1 secretary
- 1 timekeeper

- 1 office manager

These numbers remained roughly the same from year to year. The EAWs and some of the CWs were seasonal, but if they received satisfactory evaluations, they were automatically rehired for the next year.

Ms. Moody also oversaw LIHEAP's crisis program, although the work of processing crisis applications was contracted out to L&I. Crisis program workers were city L&I employees and worked out of the Municipal Services Building at 1417 John F. Kennedy Boulevard.

District Administrator Moody (who has since retired) testified before the Grand Jury, as did several other LIHEAP employees and DPW administrators who oversaw the program. They described the eligibility requirements and how the application process for cash and crisis grants was supposed to work.

Eligibility Requirements for LIHEAP Cash and Crisis Benefits

Donna Roe, the DPW director, explained Pennsylvania's eligibility requirements. Between 2003 and the spring of 2007, the State set the maximum eligible income level at 135 percent of the federal income poverty guidelines. This meant that a Pennsylvania family of four with an income below approximately \$25,000 could qualify for some assistance. (Since the fall of 2007, the eligibility cutoff has been 150 percent, or \$30,975 in annual income for a family of four.) Those with incomes approaching the maximum allowable, however, would receive only the minimum cash benefit of \$100 per heating season. Those with less income qualified for more. The maximum cash grant in Philadelphia during the period under investigation went from slightly under \$800 per season to slightly over \$800.

The exact amount was calculated based on a formula that included the number of household members, their income, the region of the state, and the type of heating fuel used. Gas

fuel brought the biggest benefit. An individual was not permitted to receive a cash benefit at more than one location. Program administrators testified that a household could receive only one LIHEAP cash payment per heating season.

In most cases, the LIHEAP rules require that cash benefits be sent directly to the fuel dealer or utility to be credited to the household's account (these will be referred to as "vendor payments"). Cash payments (hereafter referred to as "direct cash payments") are to be sent directly to the LIHEAP applicant in only two situations: (1) where the household's fuel vendor is not registered to receive payments from LIHEAP (this is most often for unusual fuel sources such as kerosene and wood, which are rarely used for heating in Philadelphia) and (2) where the applicant's heat is included in rent. The LIHEAP rules forbid an applicant from receiving both a direct cash payment and a vendor payment in the same season.

The eligibility criteria for crisis benefits were the same as for cash benefits – except that applicants for crisis grants had to demonstrate that they were in imminent threat of shutoff for nonpayment. For utilities such as gas and electric, applicants had to produce a shutoff notice. For oil and propane heat, the applicant had to establish that the tank was less than 1/8 full (a vendor could verify this by confirming a lack of deliveries coupled with cold weather). As with cash benefits, crisis payments were usually made directly to vendors, unless an applicant claimed a fuel source – such as kerosene or wood – that did not have LIHEAP-approved vendors.

Crisis applicants were permitted to receive more than one crisis grant in a season. And crisis benefits, as long the applicant was eligible (meaning household income up to 135% of the federal poverty limit), were not inversely related to income. The Grand Jury heard that the maximum allowed in total crisis payments for one season rose from \$300 in 2003 to \$600 in

2006. According to LIHEAP regulations, an individual may receive both a cash grant and a crisis grant (or multiple crisis grants up to the limit) in the same heating season.

Philadelphia's Application and Approval Process for Cash Benefits

CWs start the process by "lipending" applications.

The LIHEAP season in Pennsylvania begins the first week of November. LIHEAP does not accept applications before that date, but it does send out applications in late summer to all households that received LIHEAP cash benefits the previous year. It also distributes applications widely throughout Philadelphia. LIHEAP places paper applications at various nonprofits and community organizations in the city. Applications can also be requested directly from LIHEAP either online or by telephone. Applications can also be submitted electronically through DPW's website (www.DPW.state.pa.us).

No matter how an application from a Philadelphia household is submitted, its processing begins and ends with the CWs in the LIHEAP district office on Market Street. One of those CWs, Charlotte Ikard, described to the Grand Jury the process in place during the period under investigation. She said that when applications came in to the LIHEAP office, a CW such as herself date-stamped it. The CW then organized the applications into bundles of 14 and gave them to a clerical supervisor. The clerical supervisor placed the name of an EAW supervisor on each bundle and returned it to a CW.

The CW then "lipended" the application, meaning that the CW entered the applicant's name and social security number into the office's computer system. For each application, the CW also assigned and inputted a four-digit number that identified the EAW who would further process the application (the first two digits identified the EAW supervisor, who had already been designated by the clerical supervisor and the last two represented the EAW, who was designated

by the CW). Because each EAW supervisor oversaw approximately seven EAWs, this process meant that a CW would usually assign each EAW two applications per bundle of 14. CWs testified that the lipending process took anywhere from a second, in the case of bar-coded applications from repeat customers that could be scanned, to a couple of minutes for paper applications. CWs were expected to lipend 200 applications a day. Lipending served two purposes: it identified the EAW assigned to verify the application, and it allowed supervisors to track timeliness.

Former District Administrator Moody and DPW's Welfare Program Executive, Raymond Packer, explained that each CW who accessed DPW's computer had a unique identifying "clerical worker of PA" number, nicknamed a CWOPA. To log onto a computer, a CW must enter his or her CWOPA, a username, and a password. Every time a CW lipended an application, or later completed data-entry of an approved application, the computer system automatically logged his or her CWOPA. These ID numbers enabled supervisors to authenticate, record, and track entries of individual employees. They also prevented workers who were not permitted to enter data – such as the EAWs – from doing so.

Other rules designed to prevent unauthorized transactions included requiring CWs to use only their own computers (unless broken) and to sign off every time they left their desk – even to go to the bathroom.

Supervisors act as go-betweens when applications go from CWs to EAWs.

After lipending a bundle of 14 applications, the CW would print out a list of the 14 applicant names with their social security numbers and the four-digit EAW numbers. The CW then delivered the bundle to the supervisor of the EAW unit that the clerical supervisor had previously assigned to process the applications. The EAW supervisor in turn distributed the

applications – usually 10 to 20 a day – to the individual EAWs in accordance with the list prepared by the CW.

The process was set up so that CWs and EAWs did not come into direct contact – everything was supposed to go through a supervisor. Also, in theory, it was the CW supervisor who assigned applications to a particular EAW unit. In practice, however, the CW who lipended the application could, if assisting in a fraud, type in the number of a particular EAW with whom the CW was colluding, and then make sure that the application got to that EAW.

EAWs are supposed to verify the information on applications.

The EAW's job was to verify the information on the applications. The LIHEAP regulations (§601.106) require that social security numbers be verified unless the number is on record already from a prior year or because the applicant is in DPW's databases for receiving other public assistance. EAWs were also charged with checking to make sure that income is documented with proof such as a pay stubs for all members of the household. If the applicant claims only minimal income, the EAW can require the applicant to produce evidence showing how the household members meet their obligations and basic needs. Finally, an applicant is required to document – and an EAW to verify – responsibility for heating costs. The LIHEAP regulations require either a copy of a heating bill (if the applicant pays the vendor directly) or a statement from the applicant's landlord identifying the type of heat and stating that its cost is included in the applicant's rent (§601.104). If necessary, the EAW is supposed to contact the applicant, landlord, or employer for verification information.

The EAW also has access to DPW's "client information system" (CIS), which has records for all DPW clients, for example, if they receive Medicaid, food stamps, or public assistance. The CIS database includes names, social security numbers, income and its source.

sometimes even the type of heating used by the applicant. Another DPW database, the “income eligibility verification system” or IVES, allows an EAW to check for an applicant’s additional income by showing any social security income, unemployment compensation, interest income, and IRS information. After verifying the income information for all members of the household, the EAW calculates the applicant’s eligibility based on the State’s criteria. The EAW also needs to verify who is responsible for paying for heat in order to determine whether the cash payment should be made to a vendor or directly to the applicant. The entire verification process can take up to 30 days during the busy season, because work gets backed up.

Once this process is completed, the EAW marks the applications either eligible or ineligible and indicates with a code which vendor should be paid. If the applicant pays for heat through rent, the EAW indicates with a code “59” that the cash payment should be made directly to the applicant. The EAW then returns the application and all accompanying documentation to his or her EAW supervisor.

EAW supervisors are to review and certify the EAWs’ work.

According to the testimony presented, the EAW supervisors are responsible for reviewing the applications processed by the EAWs in their unit, assuring that the supporting documentation is in order, and signing the applications to indicate approval. The EAW supervisors, reportedly, sign between 140 and 180 applications a day, and some find the simple task of signing so onerous that they have a stamp to print their signatures.

Applications are returned to the CWs to data-enter eligibility information into the computer.

During the time under investigation, the process next called for the EAW supervisor to place the stamped, approved applications in a cardboard box on a particular table in the office. CWs would then randomly take applications from the box for the final step of processing. That

step was to data-enter into the LIHEAP computer system the information from the verified applications – whether accepted or rejected. Thus, to the original name and social security number that were already lipended into the system, the CW added the applicant’s birth date, address, heating source, and all members of the household and their income information. Based on these factors, the LIHEAP computer system calculated the appropriate amount of the cash grant. The CW entered this amount and typed in the vendor code supplied by the EAW to identify the payee – or “59” if the payment was to be made directly to the applicant in cash.

Supervisors failed to use safeguards built into the system to prevent and detect fraud.

As mentioned above, the process for approving applications was set up so that EAWs and CWs had distinct assignments that should have acted as checks on each other. If supervisors had performed as they were supposed to, CWs and EAWs would not have been able to handpick their counterparts – a particular EAW for a CW and a CW for an EAW – who would conspire with them to commit and cover up fraudulent transactions.

EAW supervisors, moreover, usually supervised only seven employees, sometimes fewer. All of the work of those EAWs had to go through their unit supervisors for approval. So the supervisors, had they reviewed the applications, presumably should have noticed if any of their EAWs were submitting an inordinate number of applications that listed the exact same income, that requested direct cash rather than vendor payments, that went to the same addresses over and over, or that were written in an EAW’s distinct handwriting.

Several witnesses – program directors from Harrisburg as well as administrators in Philadelphia – testified that the vast majority of legitimate grants went to vendors and that direct cash payments to applicants were rare. Typically a CW would handle only a few direct cash applications a year. Yet, somehow, no one noticed as the few individuals named in this

presentment processed and approved hundreds of thousands of dollars in cash payments directly to applicants. Or, as dozens of such cash payments went to the same few addresses that, if they qualified for assistance at all, could legitimately receive only one a year.

Another glaring indication that CWs and EAWs were not processing applications in accordance with proper procedures was the huge number of applications for direct cash payments to applicants that were being lipended and then data-entered into the computer system as approved on the same day. Sometimes these transactions, which represent the starting and ending points of a process that normally takes weeks, took place within minutes of each other. There is no way that an application could go from a CW to an EAW supervisor, then to an EAW for verification, then back to an EAW supervisor for review, and finally back to the original CW for data entry, all within the same day, let alone a couple of minutes.

Any supervisor paying attention would have caught these fraudulent transactions. The LIHEAP computer system, as explained by DPW's Packer, kept track of which CW lipended an application, and when; which EAW supposedly verified the information and determined eligibility; which EAW supervisor reviewed and approved the application; and which CW then performed the final data entry, and when. All supervisors also had access to DPW databases that would have allowed them to check social security numbers, income information, and in some cases heating information on DPW clients. A quick check either randomly, or when obviously suspicious applications came across their desks, would have been simple to perform.

Another tool that District Administrator Moody and her LIHEAP supervisors had, but apparently failed to use, to monitor the workers was a daily confirmation list. This list compiled all of the previous day's activities, including all approved and rejected applications. The list was put together in Harrisburg, where the state's central computer system resides, and provided daily

to District Administrator Moody. But, according to Grand Jury witnesses, Ms. Moody allowed supervisors to hand off the duty of checking the day's transactions to the CWs – the very people who had entered the transactions and had the ability to falsify and tamper with the information entered into the system.

Finally, the Grand Jury heard testimony that special procedures existed to handle the applications of LIHEAP employees, who were allowed to apply for grants. These applications, for both workers and their family members, were supposed to be handled entirely by the supervisors or administrators. The policy called for these applications to be handled and stored confidentially.

The Application and Approval Process for Crisis Benefits

The application for a crisis benefit was the same as for a cash benefit – except with “crisis” handwritten across the top. The information requested – name, social security number, address, household members and their income, type of heating, and person responsible for payment – was the same. Supporting documentation was also required. In addition, the applicant had to document the heating emergency.

The applications could be submitted to the Crisis office at L&I in several ways – they could come from community organizations that assist low-income residents in filling them out; they could be submitted directly to L&I; or they could be forwarded from LIHEAP's district office. No matter how they arrived, the applications were assigned to “crisis screeners.” the Crisis program's equivalent of an EAW. These workers, like their EAW counterparts, were responsible for verifying the information submitted with the crisis application. This included

household composition, income, type of heat, and the heating emergency. The screeners had 48 hours to make an eligibility determination – or, in extreme emergencies, 18 hours.

In cases where the applicant had already been approved for a LIHEAP cash grant, the process could be short-circuited. After confirming on the LIHEAP computer system that the applicant had received a cash benefit, the screener could declare the applicant eligible as soon as the emergency was established.

THE CRIMINAL SCHEME

It started with a few bad apples. But there was so much money to steal and so little oversight that the operation quickly expanded. Friends, family, co-workers, even casual acquaintances were solicited to join the big – and illegal – giveaway of taxpayer money.

Investigators from the Pennsylvania Office of the Inspector General and the Philadelphia Police Department, LIHEAP employees, and even a few of the participants described for the Grand Jury the scheme to steal hundreds of thousands of dollars intended to help low-income families heat their homes. Based on testimony and other evidence, the Grand Jury was able to determine the nature of the criminal scheme, summarized below. (Evidence against individual participants will be detailed in another section.)

The number of conspirators grew exponentially through training, recruitment, and bribery.

In January 2004, at least four employees in the Philadelphia LIHEAP office – three EAWs and one CW – were actively engaged in a conspiracy to defraud the program by falsifying applications for cash grants. The EAWs – Antonio Olivencia, Lindsay Rice, and Kevin McLeod – paid CW Roslyn Lemay to assist them in processing the fraudulent applications and entering them into the LIHEAP computer system. Using the names and addresses of people they knew –

or sometimes made up – and a few addresses where they could receive mail, these four employees filled out and forged, then lipended, “verified,” and approved cash grant applications. They fabricated multiple applications, for numerous applicants, at the same addresses. And even though LIHEAP regulations forbade more than one cash payment per household in a heating season, these workers approved their own fraudulent applications and ordered multiple payments to their friends, their neighbors, and their friends’ and neighbors’ relatives. In return, they usually demanded and received kickbacks. Often the fraudulent recipients turned over the entire check to the LIHEAP employees.

One address that the group used during the 2003-2004 heating season, and afterwards, was 1238 North 54th St., in West Philadelphia. Stacey Graddick, a fellow EAW, lived at this address with her husband-to-be, Kenyatta Jenkins, and a roommate, Nakesha Graves. In December 2003, EAW Rice, with the help of CW Lemay, had processed and approved a cash grant of \$737 for this address (in the name of Christine Ott). In January 2004, EAW McLeod processed and approved another grant for the same address, again for \$737. This time the application was in the name of Nakesha Graves. Lemay assisted, lipending the application and entering the final approval of payment all in the same day – an impossibly speedy turnaround in the middle of LIHEAP’s busy season.

In February 2004, three more cash grants, these for \$801 a piece, were approved for 1238 North 54th St. The applicants were Kenatte Jenkins (misspelled), Giufre Laurent (Kenyatta Jenkins’s brother), and someone named Darrell Braxton. EAW Rice processed one of these applications; Stacey Graddick herself processed the other two. Graddick told one of the Grand Jury witnesses, a co-conspirator named Clarence Malone, that Rice and McLeod had taught her how to scam the system.

The 54th Street address was not the only one being used by these EAWs to steal public funds during the 2003-2004 heating season. Rice and fellow EAW Olivencia were filing, processing, and approving multiple fraudulent applications for several addresses. Lemay was their CW on all of them in the beginning. But starting in February 2004, another CW, Tylene Holmes, also began to lipend and data-enter final approvals for applications received from addresses used by Rice and Olivencia. By the next heating season (2004-2005), the "timekeeper," Barbara Reels (who sometimes acted like a CW): another CW. Joanne Baker: and even an EAW supervisor, Yolanda Keith, were assisting the rogue EAWs in stealing from their employer.

In the spring of 2005, another CW, Sheryl Allen, joined in the illegal activity and a second, Joyce Mills, who worked with Rice and Keith on a fraudulent application in 2004, became an active participant with the others. And in the 2005-2006 heating season, CW Charlotte Ikard began lipending and processing fraudulent applications with Keith and Olivencia, and then on her own. Joanne Baker, one of the CWs involved earliest, told the Grand Jury that the EAWs paid the CWs \$50 for each fraudulent application they assisted with.

However, in order to expand the fraudulent scheme, or at least the illegal profits from it, the EAWs needed to recruit more than just CWs to assist. They needed to find "applicants" and addresses that supposedly needed heating assistance. Olivencia accomplished this by befriending a woman with a large family, some of whom lived in Puerto Rico. He then submitted applications for her, her father, her sisters, her brother, and her mother-in-law. He filed for them at more than one location, and despite the fact that the father and sister lived in Puerto Rico at the time. He continued to request assistance for an address after they had moved.

Olivencia apparently increased his take further by making up names (apparently, that is, because often no one by the names he listed on applications lived at the locations). He was able to get away with this because he enlisted the assistance of a woman who worked for a cash-checking agency. Normally, in order to cash a State check, a check-casher will require photographic identification. But Olivencia and Rice were able to cash the fraudulent checks themselves by conspiring with Norma Ortolaza, an employee at J&R Check Cashing agency at 3800 Kensington Avenue, Philadelphia.

Stacey Graddick procured fraudulent applicants and addresses with the help of a former high school classmate and friend, Clarence Malone. Malone testified that he had lived for a short time with Graddick at 1238 North 54th Street. EAW Graddick basically offered Malone a commission on all addresses and applicants he brought in to her. Malone provided Graddick with six addresses to use. These included his address at 54th Street, his father's house, his aunt's, his cousin's, a friend's, and even a post office box. Graddick trained Malone how to compile a fraudulent application, including how to forge a landlord's letter and falsify social security numbers. Following Graddick's instructions, Malone filled out applications in the names of his mother, his stepfather, his uncle, and a friend. He filled out applications in his own name, and using his middle name. He submitted at least 23 fraudulent applications through Graddick between February 2004 and December 2005. Graddick and Malone split over \$18,000 that they stole from LIHEAP using this scheme.

Addresses were an important part of the plan. The conspirators needed a number of addresses so that their fraud would be slightly less obvious. But they had to have addresses where they could pick up, and in some cases intercept, the mail so that they could receive the checks. Consequently they used their own addresses and those of friends and family and other

co-conspirators. And they shared the addresses with each other. The addresses provided by Malone, for instance, were also used by EAWs McLeod and Rice. Rice and Olivencia shared many common addresses as well. One address, 3427 A Street, Philadelphia, was used for 29 applications that were approved and processed by most of the conspirators charged in this presentment – Olivencia, Rice, Lemay, Baker, Holmes, Keith, Mills, Reels, Allen, and Ikard. LIHEAP mailed over \$20,000 to the A Street address in three seasons.

The CWs solicited and expanded their criminal transactions in still other ways. According to CW Baker's testimony, the CWs soon discovered that, while the EAWs needed CWs to assist them in procuring fraudulent payments, the CWs could steal money all by themselves. This was true because the CWs controlled the beginning and the end of LIHEAP's application approval process. They received the applications and lipended them and then they data-entered the final approvals. With no one checking on them or monitoring their work, the CWs realized that the whole fake application and verification process was unnecessary. They could simply type names, addresses, and made-up income and heating information into their computers and indicate approval of a cash grant. All they needed were names and addresses to receive checks. Some used friends and family. Others branched out and offered LIHEAP funds to almost anyone who would share the money. Baker, for instance, solicited LIHEAP "customers" from a beauty salon where she worked.

The employees learned how to circumvent the safeguards built into the system and to take advantage of lax supervision and oversight.

The LIHEAP application approval process did have some built-in safeguards to prevent the type of theft that occurred in this case, but the safeguard system depended on at least some human supervision at some level. The workers soon learned that none of their supervisors would notice – or care – if they helped themselves and their ineligible friends and relatives to LIHEAP

funds. Free of monitoring or supervision, the conspirators easily manipulated the process to approve as many fraudulent applications as they could come up with names and addresses for.

Administrators from DPW and LIHEAP and investigators from the Inspector General's office explained to the Grand Jury the safeguards built into the application approval process. First, the process was broken down into discrete tasks so that no one worker had complete control and therefore, supposedly, the next person in the chain would catch any improprieties. There was a supervisor for every seven EAWs whose primary responsibility was reviewing and signing off on their EAWs' work. There were several ways for EAWs and their supervisors to check the information on applications: EAWs were supposed to obtain documentation to verify the information contained in the applications; EAWs and their supervisors had databases that enabled them to check this information; they could also call employers and landlords who purportedly had authored letters saying that an applicant made \$200 a month or that the cost of heating was included in the applicant's rent.

The computer system, meanwhile, was designed to catch duplicate applications by reference to social security numbers. The manner of assigning and distributing work -- with supervisors supposedly acting as intermediaries between CWs and EAWs -- theoretically should have prevented collusion. And finally, there was a daily confirmation list on which supervisors could have detected irregularities.

The problem was that the practice in LIHEAP's district office did not match the description of the process. CWs and EAWs were obviously allowed to collude at will. The lax method of assigning applications to EAWs allowed the CWs to handpick the EAW who would verify an application's supporting documentation and determine eligibility. So, for \$50, the CWs would receive fake applications straight from an EAW, lipend them, and assign them back to the

same EAW who brought them the application. Not surprisingly, the EAW would find the applicant eligible. The EAW might then send the application to the EAW's supervisor for review. Or, as McLeod did, the EAW might skip this step by using an application form pre-stamped with his supervisor's signature stamp. (McLeod's supervisor testified that he used her stamp without her permission.)

The EAWs and CWs were aware that the LIHEAP computer system would catch duplicate applications if the same social security numbers were used more than once. So they "offed" a couple of digits on legitimate social security numbers – or just made up entire numbers. They knew, too, that the computer would not catch multiple payments to the same household as long as they used different names.

The EAWs also took advantage of limitations imposed by the phone system. The Grand Jury learned that the phones in the LIHEAP office did not permit calls outside of the 610 and 215 area codes. The EAWs and others who conspired with them would, therefore, deliberately make up phone numbers using other area codes for the fictitious landlords and employers who purportedly vouched for the information on applications. Not that it really mattered: none of the EAW supervisors or administrators detected fraudulent documentation even when made-up 215 telephone numbers accompanied applications.

Knowing that no one was seriously reviewing the applications, the EAWs went to little effort to hide their fraud. They freely filled out applications in their own handwriting. Or sometimes, as in the case of Olivencia, Rice, and McLeod, they would forge documents for each other. The EAWs repeatedly used virtually the same landlord letter (with a different landlord's name), the same employer letter (again, the name would be changed), and identical, suspiciously low annual incomes over and over – amounts like \$1,920, or \$2,440.

Evading detection based on the confirmation list required barely any effort at all. The frauds committed by the CWs alone, which skipped the whole application and verification process, should have been easily caught by anyone who performed the confirmation task. This confirmation list included all of the transactions approved or rejected the day before. The idea was for a supervisor to check the list against actual written applications to make sure they corresponded. If there was *no application*, someone should have noticed. But District Administrator Moody allowed supervisors to assign the confirmation duty to the very CWs who were committing the fraud. Baker admitted that when the task was assigned to her she “seldom checked all the stuff.” She said it was “tiresome work,” and she doubted that anyone else did it either. She said that she often found names on the confirmation list for which there was no corresponding application. She said that she checked the names off anyway.

Baker explained that if a person checking the confirmation list found an error, such as a name without an application, the checker was supposed to put a sticky note on the confirmation list to indicate a problem. On the very rare occasion that a worker actually followed this procedure, Baker said that she would simply intercept the list, take off the sticky notes, and shred them.

CWs also took advantage of the office’s messy filing system to misfile fraudulent applications so they could not be found. Or they would dispose of them. Applications were supposed to be retained at the LIHEAP office, but investigators were able to locate only a fraction of the applications for the fraudulent transactions charged in this presentment.

No one cared.

CW Baker told the Grand Jury that she thought the thefts had been going on for years by the time she joined in. She said that it was an open secret in the office and that management “didn’t care.” She suggested that, if anything, District Administrator Moody’s attitude encouraged the illegal giveaway of public funds. At the beginning of each heating season, Moody would meet with the workers to explain what she wanted from them. According to Baker, Moody did not talk about verification, or detection of fraud, or even office procedures. In essence, what she told them was to get the maximum amount of money out the door – or else they might lose funding and their jobs. Baker testified:

We would have a meeting in the conference room and she would tell us to get the applications done. She didn’t care how we got them done because if we didn’t get them done the funds, they would deduct the funds. We wouldn’t be able to get called back the next year, like a threat to our job. She didn’t care how they got done, just get them done.

This investigation revealed that District Administrator Moody and the supervisors who reported to her – at best – did not try to prevent the theft of the State’s LIHEAP funds. At least one supervisor, Yolanda Keith, committed crimes herself and enlisted her workers to help her. When asked whether there were any honest workers or supervisors in the LIHEAP district office, Baker said that she could be confident about only one.

LIHEAP and Crisis workers gave away cash benefits to each other.

Things were not much better over at the Municipal Services Building where Philadelphia L&I employees manned LIHEAP's Crisis program. Crisis employees not only gave away Crisis benefits to friends, family, and co-workers, but they also assisted other workers and acquaintances in submitting fraudulent applications for LIHEAP direct cash benefits.

Glenda Lawson was a Crisis screener. She fraudulently gave away thousands of dollars in state funds in return for handbags, luggage, clothing, and cash kickbacks. In one case, she processed a fraudulent application in return for assistance in procuring a FEMA grant for her sister. She approved Crisis grants for people she knew were ineligible and whose utility accounts were never at risk of shutoff. She also arranged for ineligible friends, family, and co-workers to obtain LIHEAP direct cash benefits through "a connection" she told them she had at LIHEAP.

Lawson taught a fellow Crisis employee, Cassandra Shamberger, how to fill out multiple fraudulent LIHEAP cash and Crisis applications by falsifying social security numbers and forging verification letters. Lawson then demanded a bribe in order to get the applications approved for Shamberger.

Lawson used other people's addresses to receive LIHEAP cash benefits for herself. She did not even use her own money to reward those who let her misuse their addresses. Instead, she paid them back with Crisis grants. LIHEAP EAW supervisor Yolanda Keith processed many of Lawson's fraudulent applications. In turn, Lawson approved a fraudulent Crisis payment to Keith.

Jacqueline Jackson was a Crisis data service support clerk (roughly equivalent to a LIHEAP CW). Like Lawson, she bestowed illegal Crisis benefits on friends who allowed her to receive fraudulent cash payments at their addresses. Jackson also submitted numerous fraudulent LIHEAP cash and Crisis applications in her son's name. Yolanda Keith lipended and data-

entered approval – all on the same day – for at least one of Jackson’s fraudulent LIHEAP applications.

Another former L&I Crisis employee, Tiffany Pendleton, accepted bribes from at least three women in return for her help in processing fraudulent LIHEAP cash and Crisis applications for them. Again, Yolanda Keith processed two of those applications.

Crisis workers used public funds to buy new furnaces for themselves and friends.

Both Jacqueline Jackson and Tiffany Pendleton fraudulently procured new furnaces through LIHEAP’s weatherization program. Jackson got herself a \$3,500 heater in December 2005, even though she was not eligible for assistance. That same month, Pendleton assisted a friend in procuring a new \$3,400 furnace in return for a \$600 bribe to Pendleton.

THE INVESTIGATION

A lone supervisor questioned the frauds.

One (now former) EAW supervisor, Mary Nocella, finally confronted the obvious fact that something was amiss in February 2006. One of her workers, EAW Kevin McLeod, had used her signature stamp, without her permission or knowledge, to approve applications. Ms. Nocella alerted District Administrator Moody, who questioned EAW McLeod about two applications identified by supervisor Nocella as fraudulent. McLeod admitted that he had forged Ms. Nocella’s signature, using her stamp, in order to approve cash payments to friends. Ms. Moody then referred McLeod’s case to investigators in the Pennsylvania Office of Inspector General. That office’s investigation revealed how rampant the criminality was within the LIHEAP office.

The Inspector General's investigators found massive fraud in Philadelphia's LIHEAP program.

In February 2006, Joseph Sweeney, a Special Investigator in the Inspector General's Office, and Robert Turner, a Welfare Fraud Investigator, began a probe of LIHEAP following the report of Kevin McLeod's misdeeds. They concentrated their investigation on the previous three heating seasons – 2003-04, 2004-05, and 2005-2006. What they found was an entire network of workers – CWs, EAWs, and at least one supervisor – routinely, systematically, and illegally siphoning funds from the program.

Investigator Sweeney testified that he interviewed every supervisor in the Philadelphia LIHEAP office and two thirds (about 50) of the employees, including EAWs and CWs. He questioned them in order to get an understanding of how the program worked and how thefts might be occurring. Based on his interviews, he and Agent Turner developed a strategy for detecting fraudulent transactions. They began a review of the cash program by focusing on large (over \$700) direct cash payments made to applicants. According to the LIHEAP administrators, these should be relatively rare. Direct cash payments were not the norm to begin with, and to receive one for more than \$700 required an annual income of about \$2,800 or less, which was even more unusual. Sweeney considered applications for such payments a "red flag," indicating likely fraud.

Another red flag that Sweeney and Turner looked for as they reviewed LIHEAP records was the lipending and final approval of an application in a single day, usually by the same CW. The investigators learned that this was a nearly impossible occurrence if the prescribed lawful process was followed, especially during the busy months of the heating season. The way the approval process was set up, it should occur only by random chance that the same CW would both lipend an application at the beginning of the process and then receive the same application

back to enter into the computer after final approval. Sweeney testified that the process of verification by the EAW would normally take a couple of weeks, and up to 30 days during the busy season. So, if a CW, let alone the same CW, was completing the whole process in a single day, that would be suspicious.

As Sweeney and Turner searched the LIHEAP database looking for transactions that raised these red flags, they noticed that the same workers and the same addresses kept repeating. The repeat addresses were noteworthy because a household, whether it was an apartment or a house, was supposed to receive only one LIHEAP cash grant in the name of one applicant per heating season. Yet the investigators noticed that some recipients, despite varied spellings of the same name and distortion of the SSN, were getting multiple direct cash grants of \$700 or more. Plus, the grants were going to different individuals at the same address. The names that kept appearing as the EAWs and CWs for applications from these repeating addresses were Stacey Graddick, Lindsay Rice, Antonio Olivencia, Roslyn Lemay, and Barbara Reels.

Agent Turner focused his investigation on more than 20 addresses for which numerous applications were approved for direct cash benefits of over \$700. In reviewing all of the transactions for these addresses, other names appeared repeatedly – Kevin McLeod, Joanne Baker, Yolanda Keith, Tylene Holmes, Sheryl Allen, Joyce Mills, and Charlotte Ikard.

Turner visited these 20 plus addresses and interviewed owners, landlords, and tenants. He also searched several databases for information about purported applicants and addresses. He compiled an initial list of 221 suspicious transactions and asked the Social Security Administration to check the validity of the social security numbers submitted on the applications. He asked DPW for the original applications for these transactions. Although many were missing, eventually, Turner and Sweeney obtained over 150 applications.

The investigators took handwriting exemplars from Rice, Olivencia, Graddick, and McLeod, and had the applications analyzed and compared to the EAWs' known handwriting. They inspected the checks that were sent to the applicants and determined where they had been cashed. This led them to interview the owner of the cash-checking agency where Norma Ortolaza worked.

What the investigators found was a massive fraud. They discovered that landlords had never heard of their supposed tenants. Applications claiming that applicants paid rent were sent from single-family, owner-occupied properties. Many of the properties were owned or occupied by family and friends of the EAWs, and served merely as mail drops for receipt of State checks. The social security numbers proved to be invalid in 205 of the 221 cases submitted for verification. And even the 16 applications that contained social security numbers that matched the applicant were fraudulent for other reasons – for example, because of under-reported income or false information about responsibility for heating or its source.

Many of the “applicants” could not be found on any database (including DPW’s and the Department of Transportation’s) and appeared to be fictitious. The investigators found the exact same receipt for kerosene submitted repeatedly by applicants claiming to heat with kerosene. (Heating with wood or kerosene was one of the ways to receive a direct cash payment as opposed to a vendor payment.)

In the end, the fraud uncovered by the investigators went way beyond the original 221 suspect transactions. Those 221 were all tied to the original set addresses that showed up as repeat recipients of large direct cash grants. The other red flag that the investigators were looking for was the 1-day transactions. As it turned out, many of the CWs who assisted Rice, Olivencia, McLeod, and Graddick in perpetrating their thefts, also processed an inordinate number of

applications in one day – in addition to the 221. Upon further investigation, Sweeney and Turner found evidence that these transactions were fraudulent too. Social security numbers were invalid, recipients were ineligible, and incomes were misstated. Many of the transactions that were processed in one day were data-entered into the computer as approved just minutes after being lippeded.

The investigation kept unearthing more and more fraud. The search for direct cash payments over \$700 led to the original five employees. A review of the transactions conducted by those EAWs and CWs led to the suspect addresses that they used. Then a review of the transactions associated with those addresses led to still more names of more employees. Looking at those employees' records in turn revealed yet more suspect transactions. Had the probe been expanded it undoubtedly would have found more criminal transactions. But the investigators chose to concentrate on only the most egregious perpetrators and the most obvious frauds. The evidence against these individuals is detailed below.

EVIDENCE AGAINST INDIVIDUALS

Much of the evidence relating to particular transactions by the individuals named in this presentment was presented to the Grand Jury in the form of spreadsheets. These were prepared by Investigator Sweeney and Agent Turner. The charts lay out in a concise fashion the enormous amount of information that the investigators collected over many months. Spreadsheets for the addresses used by the EAWs and their co-conspirators to fraudulently obtain LIHEAP checks include:

- the number of LIHEAP applications submitted from each address
- the name of the applicant

- the amount of the cash grant
- the total dollar amount of all of the cash grants to the address
- the name of the EAW who supposedly verified the application
- the name of the CW who lipended the application
- the name of the CW who entered the final approval into the computer
- the dates of the lipending and the final approval
- the alleged household income for the address
- a list of the invalid social security numbers submitted on the applications
- information about the ownership or tenants associated with the address
- information on how and where the LIHEAP checks were cashed
- and any other relevant information the investigators learned.

Sweeney and Turner did not simply document suspicious anomalies in LIHEAP's documentary record and computer database. They followed up with investigations to confirm the criminal activity indicated by the information they had gathered. Sweeney and Turner testified that a combination of factors present in the transactions made it quite evident that the applications involved, and therefore the payments, were fraudulent. These factors included multiple payments to the same address, false social security numbers, unverified and unusually low income reported for a household, ownership of houses that did not correspond with the information submitted on applications, and applicants who never lived at the address or had moved.

In addition, the investigators prepared separate spreadsheets for each LIHEAP employee involved in the scams. Because the employees used in many of their fraudulent applications the same addresses identified on the investigators' charts, a number of the fraudulent transactions

appear on both the spreadsheets organized by address and those organized by employee, especially for the EAWs. However, some of the employees – mainly the CWs, supervisor Yolanda Keith, timekeeper Barbara Reels, and EAW Kevin McLeod – performed numerous fraudulent transactions using additional addresses not captured on the spreadsheets organized by address.

Investigator Sweeney and Agent Turner testified about their probe in general and about how they prepared the spreadsheets. The information presented by the investigators and by other witnesses who appeared before the Grand Jury supports criminal charges against the following individuals.

1. **Antonio Olivencia**
2. **Lindsay Rice**
3. **Norma Ortolaza**

The evidence presented against EAWs Antonio Olivencia and Lindsay Rice reveals a vast conspiracy, wherein they filled out, signed, and verified fraudulent applications for each other, and then used the same addresses to receive the LIHEAP checks. As Norma Ortolaza's involvement was integral to the scam and closely tied to the activities of Rice and Olivencia, her participation will be discussed along with the evidence against them. And, although many CWs were also intimately involved with Rice's and Olivencia's transactions, those workers had a broader involvement, both independently and with other actors as well. Their criminal activities will be discussed separately.

The fraudulent transactions assigned to **Antonio Olivencia**, an EAW at LIHEAP during the 2003-2004, 2004-2005, and 2005-2006 heating seasons, are listed in the spreadsheet attached as Appendix A-1. The chart lists **103 transactions** that Olivencia claimed to verify during the three heating seasons, resulting in LIHEAP payments totaling **\$77,462**. The **87 applications** that

listed **Lindsay Rice** as the EAW (**employed by LIHEAP** during the 2003-2004, 2004-2005, and 2005-2006 heating seasons) are attached as A-2. These total **\$64,001** in fraudulent payments. Between the two of them, Olivencia and Rice stole \$141,463 from LIHEAP in three home-heating seasons. They cashed State checks totaling approximately \$114,000 at J&R Check Cashing. The IG investigators' evidence established that Norma Ortolaza assisted Rice and Olivencia by cashing 138 checks that she knew they were not entitled to.

Olivencia and Rice used 22 addresses to receive LIHEAP checks. They both used 15 of the addresses. Olivencia used three additional addresses that Rice did not use, and although Rice used four that Olivencia did not use, two of these four were also shared with EAWs Graddick and McLeod. Some of the 15 addresses that Rice and Olivencia shared were the homes of friends and relatives of Rice's. Others were more closely related to Olivencia. But it is clear that the two worked together and freely used the addresses of each other's friends and family. The 22 Philadelphia addresses that the two EAWs used are listed below. The spreadsheets contain the essential evidence, but Agent Turner provided additional information about some of the addresses during his testimony. This information is included under the relevant address.

Addresses that both Rice and Olivencia used:

- 1316 Devereaux Avenue [Spreadsheet attached as A-3]
 - Olivencia's wife was the registered owner of this single-family house.
 - Two of the LIHEAP checks were made out to Elijah Gonzales, who had a lease, along with Olivencia's daughter, Natalia Olivencia Gonzales, at a different location.
- 1519 N. 17th Street [A-4]
 - Lindsay Rice's mother lived here.

- 1535 N. Bouvier Street [A-5]
 - This house is owned by the mother of Rice's best friend.
- 1733 Oxford Street [A-6]
 - Lindsay Rice lived here.
 - One LIHEAP check recipient, Andre Scott, was Rice's barber.
- 1809 E. Ontario [A-7]
 - This house is owned by Norma Ortolaza's parents.
 - Edward Ortolazo told Agent Turner that he had received LIHEAP and Crisis checks here through his friend Olivencia. Ortolaza said that he told Olivencia his income was \$11,000, not the lower amounts reported on the applications in his name.
- 1999 73rd Avenue [A-8]
 - Rice had a lease at this address with his girlfriend.
- 2061 & 2073 E. Rush Street [A-9]
- 2511 N. Mascher Street [A-10]
- 3066 N. E Street [A-11]
 - This property was a nuisance bar closed by the District Attorney's Office.
It contains no residences.
- 3427 A Street [A-12]
- 3639 N. Marvine Street [A-13]
 - The house was owned by the common-law wife of a good friend of Rice's.
- 4103 I Street [A-14]
 - Luz Molina, Olivencia's friend, lived here.

- 6632 N.17th Street [A-15]
 - The house was owned by the cousin of Rice's girlfriend.
- 917 N. 15th Street [A-16]
 - The occupant had been a co-worker of Olivencia's.

Addresses used by Olivencia, but not Rice, were:

- 2942 N. Mascher [A-17]
- 606 Vankirk Street [A-18]
- 3540 N. G Street [A-19]
 - Lissette Reyes, who lived at the address, said that Olivencia solicited her for a deal to receive LIHEAP funds.

Addresses used by Rice, but not Olivencia, were:

- 1238 N. 54th Street [A-20]
 - EAW Graddick lived at this address.
 - Nine false social security numbers were created for the LIHEAP applications using this address by switching two digits of legitimate SSNs that belonged to people with no connection to the applicant.
- 1302 N. 57th Street [A-21]
- 3149 N. 25th Street [A-22]
 - This was the home of Rice's barber, Andre Scott. He told Turner that he allowed Rice to have checks sent to this address. Scott gave the checks to Rice, but kept and cashed one.
- 1529 N. Bouvier Street [A-23]
 - Lindsay Rice's mother lived here.

In addition to receiving the spreadsheets as evidence, the Grand Jury heard testimony from several witnesses. Retired LIHEAP District Administrator Marietta Moody testified that Olivencia and Rice worked for LIHEAP as EAWs during the period under investigation – the 2003-2004, 2004-2005, and 2005-2006 heating seasons. A former LIHEAP assistant district administrator, Jacqueline Dantzler, testified that Rice and Olivencia worked together in the same EAW unit with Yolanda Keith as their supervisor. Moody named Olivencia and Rice as two of three EAWs who, she later discovered, had processed an unusually high number of applications resulting in direct cash payments of more than \$700 to individuals rather than vendors. According to Moody, Olivencia and Rice each handled between 60 and 80 applications of the “59” type during the 2005-2006 season. She said this was unusual because most EAWs handled between 8 and 20 direct cash grants per season.

Other witnesses who testified before the Grand Jury implicated Rice. Clarence Malone, a friend and co-conspirator of EAW Stacey Graddick, testified that in 2003 Graddick told him that she worked with Rice at LIHEAP and that Rice, along with EAW Kevin McLeod, taught her how to use phony applications to manipulate the LIHEAP program to generate cash payments for themselves. Malone also testified that, in creating false applications, he used other people’s social security numbers that he obtained from his mother’s business and he admitted that he sometimes switched around the middle digits. This is consistent with what the investigators found.

Joanne Baker, a former LIHEAP CW, told the Grand Jury that she knew Rice was paying CW Roslyn Lemay to enter fraudulent transactions for him. Baker recalled visiting Lemay’s cubicle on one occasion when Rice walked by. Lemay asked him for \$50. Baker said that at first

she did not know what the money was for, but that she later found out they worked together on fraudulent applications.

Police Officer Patricia Wong, assigned to the Philadelphia District Attorney's Office, testified that she interviewed Luz Molina, whose name was used on fraudulent applications verified by Olivencia. Molina stated that she was born in the same part of Puerto Rico as Norma Ortolaza. Years later, the two women became neighbors in Philadelphia. For one year, Molina lived at 1809 East Ontario Street in Philadelphia with her five children. When Molina first moved to East Ontario, Ortolaza's mother, Iris, filled out Molina's DPW child-care applications. Iris Ortolaza introduced Molina to EAW Olivencia, who later lived for a time with Molina at 1809 East Ontario Street.

Molina told Officer Wong that, beginning in 2003, Olivencia filled out a LIHEAP application for her and the money was credited to her gas company PGW bill. This practice continued when she moved to 4103 I Street. According to Molina, Olivencia also filled out LIHEAP applications for members of Molina's family (including her father, Francisco Rivera, Sr., her brother, Francisco Rivera, Jr., her sisters, Elizabeth Rivera and Franchillea Rivera, and her mother-in-law, Juana Perez), using the same East Ontario Street and/or I Street addresses even though these "applicants" never lived there.

Molina told Officer Wong that Olivencia intercepted the checks sent in the names of her relatives at her two addresses through the mailbox outside her door. She also said that he also had a key to her house. According to her statement, Molina never received money from Olivencia for using her address to collect checks for non-existent household members. The investigation determined that Olivencia cashed these and other fraudulent checks at J&R Check Cashing, located at 3800 Kensington Avenue, where Norma Ortolaza worked.

Molina confirmed as fraudulent two LIHEAP applications that Officer Wong showed her. One, dated January 2, 2006, purported to be an application for her sister, Elizabeth. The other, dated February 15, 2006, was for her father, Francisco Rivera, Sr. Molina pointed out that these applications were obviously false since both were living in Puerto Rico at the time. Ms. Molina admitted that her sister's signature was forged by Olivencia.

Robert Sink, the owner of J&R Personal Financial Services, Inc. – formerly J&R Check-Cashing – testified before the Grand Jury. Sink testified that one of four stores he owns is a check-cashing, money order, and Western Union office at 3800 Kensington Avenue in Philadelphia. Sink identified Norma Ortolaza as one of two co-managers employed at that location. The other was named Erica Vargas. These two were responsible for cashing checks as well as other payment, lottery, and Western Union duties. Sink testified that at closing the managers added up all of the checks cashed that day. The final sum was recorded on a tally sheet and initialed by the manager. Vargas signed her tallies with script initials. "ER." Norma Ortolaza used "NO." Sink said that he considers Ortolaza and Vargas as equals. Sink estimated that the percentage of state checks his stores handle is very small.

Agent Turner testified that he interviewed Mr. Sink who told Turner that each check casher had an individual stamp such as K1, K2, or K3. Turner identified 153 LIHEAP checks that were cashed at J&R Check Cashing with a value of \$114,461. Many of the checks were written to people who did not exist, or were in Puerto Rico at the time and could not possibly have cashed them. Tally sheets provided by Sink to Turner show that 138 of the 153 Commonwealth of Pennsylvania checks were processed by Norma Ortolaza. These 138 checks that Ortolazo conspired to cash totaled **\$104,219**. One check was processed by an unidentified employee, and the remainder was handled by Vargas.

The Grand Jury heard from Philadelphia Police Officer Kevin Dwyer, who is assigned to the Police Department's Document Examination Unit. He authenticates, identifies, and examines writings and documents. Qualified in state and federal courts as an expert document examiner, Officer Dwyer is an expert in handwriting and has examined well over 13,000 questioned documents. His involvement in this investigation began when Philadelphia Police Detective Charles Figorski forwarded to him approximately **156** LIHEAP applications, along with handwriting samples taken from EAWs Olivencia, Rice, Graddick, and McLeod. Detective Figorski requested that Officer Dwyer conduct an examination. Officer Dwyer examined not only the applications but also purported verification documents attached to the applications; namely, handwritten and typed letters containing signatures. Income documents and landlord-tenant statements were also included in the applications for LIHEAP benefits.

Officer Dwyer examined three sets of LIHEAP documents. The first set included 25 LIHEAP applications, which purported to be verified by EAW Kevin McLeod. Dwyer concluded Kevin McLeod had in fact signed as the verifying EAW on page two. Officer Dwyer found that Olivencia forged the applicant's signature on one of these 25 applications.

The second set of documents included 67 applications for which Olivencia was listed as the verifying EAW. Based on his examination of these 67 applications, Officer Dwyer found that:

- Olivencia signed all 67 of the applications as the verifying EAW on page two.
- Olivencia filled out the actual applications for 7 of the 67 applications.
- Olivencia filled out and signed the applicant signatures on an additional 39 of the 67 applications.

- Olivencia filled out and/or signed income letters or landlord-tenant letters for 38 applications.

The third set included 54 applications that Officer Dwyer found EAW Lindsay Rice to have signed as the verifying EAW on page two of each application. For these 54 applications verified by Rice, Officer Dwyer made the following findings:

- Olivencia filled out the applications and forged the applicant signatures for 20 of the 54 applications.
- Olivencia signed just the applicant signatures on 2 additional applications.
- Olivencia either filled out and/or wrote or signed income verification letters or landlord-tenant verification letters for 24 applications.

Regarding Lindsey Rice, in the set of 25 LIHEAP applications that he found Kevin McLeod to have signed as the verifying EAW, Officer Dwyer found that:

- Lindsay Rice filled out and signed 2 of those applications.
- Lindsay Rice filled out and signed a verification letter for 1 of the applications.

In the set of 67 applications that Officer Dwyer found Olivencia to have signed as verifying EAW on the second page, Officer Dwyer found that:

- Lindsay Rice filled out the application for 1 of them.
- Lindsay Rice signed the applicant signatures on 8 applications.
- Lindsay Rice filled out the income letters and/or landlord-tenant letters for 7 applications.

And lastly, in the third set of 54 documents that Officer Dwyer found Rice to have signed as verifying EAW, Officer Dwyer found that:

- Lindsay Rice signed each of the 54 applications under the worker's signature on page two.

- Lindsay Rice completely filled out 25 applications.
- Lindsay Rice signed the applicant signatures on 2 applications.
- Lindsay Rice filled out income letters and/or landlord-tenant letters for 9 applications.

4. Clarence Malone

5. Stacey Graddick

Clarence Malone testified before the Grand Jury that between November 2002 and March 2003, he lived with Stacey Graddick, Nakesha Graves, and Kenyatta Jenkins at 1238 North 54th Street, Apartment 3-A, in Philadelphia. Malone stated that Graddick and Jenkins were engaged at the time and later were married. Graddick was employed at the LIHEAP district office in the heating seasons from 2003 through 2006. Malone testified that he originally met Graddick at Overbrook High School in 1990. He said that he and Graddick had a conversation in 2003 about submitting fake applications for LIHEAP benefits.

Graddick told Malone that they could manipulate the system by doctoring applications so that LIHEAP would send the money to them rather than to the gas company. Malone said that Graddick essentially told him that the more addresses he could produce, the more money Malone could make. Graddick initially wanted no more than three addresses, but more addresses meant more money. So Malone came up with more addresses, and eventually even obtained a post office box in order to receive checks.

Malone testified that he filled out LIHEAP applications in accordance with Graddick's instructions. He filled in a name and address then wrote that gas heat was included in the rent because Graddick told him gas qualified for more money. Malone further testified that Graddick instructed him to include a letter of verification, indicating that the applicant was renting a room with heat included as a portion of the rent. Malone explained that this ensured that the check

came to Malone, not the gas company. Graddick also told him to use area codes other than 215 and 610 for employer and landlord phone numbers because the LIHEAP phones could not dial long distance. Some of the social security numbers used on applications were invented; others Malone obtained from his mother's business, a music entertainment company. He said that he once stumbled on a file of SSNs while using the business's computer. He knew the SSNs in that file would be useful for the fake LIHEAP applications. He said that he sometimes altered real SSNs either by inverting the middle two numbers, or by changing the last four digits only. Malone and Graddick mailed in the applications the first year, 2003-2004; after that, Graddick would take them into work and process them.

Malone described in detail the Philadelphia addresses that he and Graddick used for fraudulent LIHEAP applications, as follows:

- **729 Wynnewood Road, Philadelphia, PA [B-1]**

Malone testified he had access to this address because, during 2003-2006, both he and his father, Clarence Malone, Sr., lived there. His mother, Yvonne Logan, and his stepfather, Jack Logan, lived in New Jersey during that time. Malone stated he received a number of LIHEAP checks at 729 Wynnewood Rd. because he had easy access to home. Graddick knew he was using this address for the scam because they had talked about it and Malone gave Graddick multiple LIHEAP applications bearing this address. It was a single-family residence.

Malone's testimony is confirmed by the IG investigators' spreadsheet that shows 12 fraudulent applications using this address, totaling \$9,394 in LIHEAP payments, all in the names of Malone, his mother, and his stepfather. (See B-1)

Malone identified the following seven LIHEAP checks that were mailed to this address:

- **3/23/05 Commonwealth check made payable to Jackie Logan for \$818.**

Malone testified that his stepfather, the check payee, did not reside there in March 2005. Malone admitted cashing the check but Graddick demanded and received all of the funds for her wedding.

- **1/4/06 Commonwealth check made payable to Jackie Logan for \$781.**

Malone applied for this check. He gave it to Graddick; she probably endorsed the check because he did not sign or cash it. Malone testified that Jack Logan received nothing from this or the above check because Logan knew nothing about the checks.

- **1/5/05 Commonwealth check made payable to Clarence Malone for \$818.**

Malone admitted he endorsed and cashed this check. He testified Graddick was aware that he was personally applying for LIHEAP benefits using that address. He specifically remembers this check because he had to write where he worked on the check's back. He testified that Graddick solicited the application from him and they split this check, each getting about \$400 because of fees that were charged.

- **1/5/05 Commonwealth check payable to Yvonne Logan for \$771.**

Malone admitted he was responsible for this application as well. On the check, he wrote "For Deposit Only." He testified that he cashed the check and split the proceeds, roughly \$350 each for Graddick and himself.

- **3/23/05 Commonwealth check made payable to Yvonne Logan for \$818.**

Malone admitted that it is his handwriting on the back of the check, including the account number. He is responsible for the application and the

forthcoming money. Malone stated that he deposited the check into an account at Commerce Bank in Cherry Hill, and then split the money evenly with Graddick.

- **11/23/05 (possibly 11/29/05) Commonwealth check made payable to Yvonne Logan for \$719.**

Malone identified his mother's signature in the endorsement section. The check was cashed at a Sovereign Bank. He took responsibility for the LIHEAP application. He lied to his mother about the basis of the check so that she would cash it and send him the money. He said he thought that Stacey Graddick demanded and received the entire proceeds of the check in preparation for her wedding.

- **2/8/06 Commonwealth check made payable to Yvonne Logan for \$760.**

Malone testified that he sent this check to his mother, asking her to deposit it and send the money to him. Malone said his mother did not know what was going on because he lied to her. He admits his responsibility for this theft.

In addition, Malone admitted receiving six additional checks at 729 Wynnewood Rd., which are listed in Appendix B-3.

- **1238 North 54th Street, Apartment 3-A, Philadelphia, PA.**

This was Graddick's address. Malone had access during the times he was living there in 2003. He said he used that address for one or two fraudulent applications, as did Stacey Graddick, Nakesha Graves, and Kenyatta Jenkins.

Malone identified the following LIHEAP check that was mailed to this address:

- **3/23/05 Commonwealth check made payable to Jackie Logan for \$818.**

Malone testified that Jack Logan, his stepfather, did not reside there in March 2005. Malone admitted he endorsed the check.

In addition, Malone admitted receiving another check – payable to Carole Malone for \$818– at this address. It is listed in Appendix B-3.

- **6144 Irving Street, Philadelphia, PA.**

Malone testified that Rachael Malone, his cousin, lived there between 2003 and 2006. He entered the home without any problem. Malone testified that neither he nor his father resided there between 2003 and 2005. In fact, Malone stated, his father never lived there.

Malone identified the following LIHEAP check that was mailed to this address:

- **2/16/05 Commonwealth check made payable to Jay Malone for \$818.**

This check is to Clarence Malone; Jay is Clarence Malone's middle name.

He could not remember if this check was split, but testified that it was probably split about \$400 each with Stacey Graddick.

In addition, Malone admitted receiving another check – payable to Clarence Malone II for \$818 – at this address. It is listed in Appendix B-3.

- **211 North 63rd Street, Philadelphia, PA. [B-2]**

From 2003 to 2006, a friend of Malone's named Carol McCormick lived at this address.

Malone's friend, Precious Lloyd, never resided there, nor did his uncle, Carl Malone.

Malone admitted that he and Graddick conspired to send LIHEAP checks payable to

Lloyd and Carl Malone to 211 North 63rd Street. He had the keys to McCormick's

apartment from 2003 to late 2006 because he watched her kids occasionally. He would

bring in the delivered mail and intercept any checks sent there, so McCormick would not

see the mailed check.

Malone identified the following LIHEAP check that was mailed to this address:

- **3/10/04 Commonwealth check payable to Carl Malone for \$737.**

Malone admitted that he forged the signature of his uncle, Carl, on the check and cashed it. Graddick's split on this check was about \$350. Clarence

Malone testified that his uncle, Carl Malone, knew nothing about this check

In addition, Malone admitted filing an application for his friend Precious Lloyd at this address. The corresponding check made payable to Lloyd for \$810 is listed in Appendix B-3.

- **1723 North 62nd Street, Philadelphia, PA.**

Malone gained access to this house because his aunt, Carol Malone, resided there, along with cousins Brennen, Byron, and Brittany. Malone testified that, because it was the home of relatives, he would be let in without any problem. Malone further stated that neither he nor his mother or father lived there.

Malone identified the following LIHEAP check that was mailed to this address:

- **3/9/05 Commonwealth check made payable to Yvonne Logan for \$818.**

Malone cashed the check; the endorsement is in his handwriting. He said he thought he gave the entire check amount to Graddick to help with her wedding.

In addition, Malone admitted receiving another check – payable to C.J. Malone for \$818 – at this address. It is listed in Appendix B-3.

- **P. O. Box 38645, Philadelphia, PA.**

Malone testified he opened this post office box at 30th Street Station Post Office in Philadelphia in the name of his uncle, Carl Malone. He did this to receive LIHEAP checks; he was afraid that his uncle, rather than he, would receive a check sent to Carl Malone's residence and cash it. Malone related that he had the key for the post office box and picked up the mail in it. He stated that he informed Graddick about the post office box. In his testimony, Malone stated he never shared this box and his uncle, Carl Malone, did not know about it. It was solely Clarence's box. He simply used his uncle's name.

Malone identified the following LIHEAP checks that were mailed to this address:

- **9/22/05 check made payable to Yvonne Logan for \$818.**

According to Malone, there is no signature on the check because he deposited it without signing it. He stated his mother never saw this check.

- **3/23/05 check made payable to Carl Malone in the amount of \$753.**

The check contains two signatures, Malone's and his uncle's. but Malone said that he forged Carl's signature. He deposited the check at Commerce Bank with a debit card, waited a few days for it to clear, then withdrew the money with his MAC card. Stacey Graddick received the entire amount of the check for her wedding. Malone testified that Graddick asked for the entire check explaining that wedding arrangements require payment in advance

- **5/2/05 check made payable to Carl Malone for \$818.**

The check is endorsed with Malone's and his uncle's names. Malone testified that he forged Carl Malone's signature, signed the check, then cashed it. Graddick used all \$818 of this check for her wedding.

Malone testified that he knew when the LIHEAP checks would arrive in the mail because LIHEAP sent out anticipatory letters, and because Stacey Graddick's computer access allowed him to know when a check was cut.

Malone explained how he and Graddick handled the money they stole from the LIHEAP program. Malone stated that Graddick suggested that they split the check money 50/50 and he agreed. However, Malone testified that Graddick demanded 100 percent of the proceeds from the last few checks. She told Malone she needed the money to help pay for her wedding to Kenyatta Jenkins.

Malone testified that, during 2003-2005, he and his mother, Yvonne Logan, shared a joint checking account at Commerce Bank. He either deposited the checks into Commerce Bank or took them to a check-cashing agency. Malone testified that he changed the mailing address on the Commerce Bank account so that the bank delivered monthly statements to his post office box. He used his Commerce Bank debit card to obtain the cash to give Graddick her share of the funds. He said he never gave his mother any LIHEAP money because she never knew anything about his fraudulent behavior.

Malone testified that he signed virtually all the checks he received, but that Graddick signed one or two. Malone stated that, after Graddick's wedding, he stopped receiving checks.

Malone admitted that between 2003 and 2007 he received **23 LIHEAP checks** that were mailed to the above six addresses. The checks totaled **\$18,238**. [See Appendix B-3]

Agent Turner testified that Malone's was not the only post office box that he ran across in his investigation. Turner said that he saw checks going to about 25 post office boxes, even though no one he spoke to at LIHEAP could explain why that should be happening legitimately. This is just one more indication that there was much more fraud in the LIHEAP program than is charged in this presentment.

Malone's were not the only fraudulent applications that EAW Graddick processed. The investigators prepared a spreadsheet that included 18 applicant names and several addresses unrelated to the ones Malone admitted using. They found a total of **28 additional fraudulent transactions** among the applications assigned to **Graddick** as EAW – 23 of them lipended and finalized in the same day by the same CW. (This does not include applications that list other EAWs such as McCleod and Rice, even though the EAWs clearly conspired with each other on fraudulent transactions for which they were not necessarily the EAW of record.) Three more were completed within one day by the same CW, still a nearly impossible occurrence without fraud. All of these were direct cash payments for \$700 or more. The only one of these transactions that took more than a day, or was for less than \$700, was for Brenda McLeod – EAW Kevin McLeod's deceased mother. The total LIHEAP sum paid on these 28 fraudulent applications attributed to EAW Graddick was **\$21,751**. [B-3], bringing the total theft to \$39,989.

Other Grand Jury witnesses provided evidence relating to Graddick. Former CW Joanne Baker testified that CW Roslyn Lemay, told her that Graddick paid Lemay to enter fraudulent information into the computer system. According to Baker, Graddick worked with Lemay to process bad transactions until the pair had a "falling out." Graddick then solicited Baker to help her process fraudulent applications. Baker testified that she agreed to do it because she needed

the money at the time. Later, Lemay told her that the falling out with Graddick was because Graddick did not pay Lemay. Baker also said that Graddick was close to CW Reels.

Officer Dwyer testified regarding his examination of 10 LIHEAP applications on which Graddick is the verifying EAW. Dwyer testified that Detective Figorski provided him with 40 sheets of paper bearing the known handwriting and hand printing of Stacey Graddick. Officer Dwyer concluded that he could neither identify nor eliminate Graddick as the person who verified the 10 applications because the signatures all appeared to be disguised. He found, however, that Graddick forged the applicant signatures on two of the applications.

Agent Turner testified that Graddick's 28 fraudulent applications contain such red flags as repeating addresses, bad SSNs, and underreported income. Turner checked the welfare database to determine if any of the "applicants," with either good or bad SSNs, had received welfare benefits as might be expected if the applicants truly had incomes as low as they claimed. None had applied for any other benefits such as public assistance, food stamps, and medical assistance.

It should be noted that, while Malone testified about his collusion with EAW Graddick, the LIHEAP records reviewed and charted by the IG and DPW investigators list other EAWs – among them McLeod, Rice – on some of Malone's transactions. The Grand Jury found this to be further evidence of the extent to which EAWs and CWs conspired with and covered up for each other.

6. Kevin McLeod

Mary Nocella, formerly an EAW supervisor at LIHEAP, testified about her confrontation in early 2006 with 10-year veteran EAW Kevin McLeod. Nocella told us that she formerly

supervised McLeod. She testified that she confronted him about a completed LIHEAP application he had verified bearing Nocella's signature stamp. Nocella stated she had not approved the application and the document lacked her customary date stamp. She told the Grand Jury that her name stamp was stored either on her desk or in her top desk drawer. She had no key to her desk. Nocella informed the Grand Jury that anyone who walked into her office when she was not there had access to her signature stamp.

Nocella testified it was not permissible for either EAWs or CWs to use her stamp when she was not in her office. In addition, she testified that she was familiar with McLeod's handwriting and recognized that McLeod had filled out the entire suspect LIHEAP application. When she brought this to McLeod's attention, he admitted filling out the fraudulent application. Nocella said that she then referred the suspect application to upper management at LIHEAP.

Nocella further testified that when McLeod left LIHEAP, she helped clean out his workstation. She discovered a pack of blank LIHEAP applications with her name already stamped on the back of each one. Nocella testified that a LIHEAP application had to be completely filled out, had to have an eligibility determination made by the EAW, and had to be ready for processing through the clerical department before a supervisor's name could be legitimately stamped on it. Nocella stated that no supervisor should or would sign or stamp a blank application.

Former District Administrator Marietta Moody testified about her subsequent confrontation with McLeod. After showing McLeod the two questioned applications forwarded to her by supervisor Nocella, McLeod admitted that he had taken and used Nocella's stamp without her knowledge to approve the cases for his friends. Moody testified that she sent the two fraudulent applications to the Office of the Inspector General.

Moody further testified that both applications were direct cash payments in excess of \$700. Moody stated that such an amount for a cash grant was very unusual, because the average “59” cash payment is in the \$200 range. Moody said the number of cash payments exceeding \$700 should be small because that type of payment is reserved for people who have reported income of generally less than \$2,000 a year.

Clarence Malone testified that he knew McLeod through EAW Graddick. Malone explained that, sometime in 2003, Graddick mentioned that she worked with LIHEAP co-worker Kevin McLeod and that McLeod was one of two EAWs who taught her how to manipulate the LIHEAP program to generate checks illegally. According to Malone, all of his criminal activity with fraudulent LIHEAP applications involving McLeod’s name must have been done through Graddick.

Investigator Sweeney testified that he reviewed numerous questionable transactions handled by EAW McLeod. He stated that he identified the suspect applications processed by McLeod from his review of the DPW database and the physical applications he obtained. Sweeney uncovered 83 transactions processed by McLeod for amounts over \$700 each, almost all of them direct cash payments to individuals. All 83 contained bad names, addresses, and SSNs, or unusually low reported income of about \$2,400. The vast majority of the transactions were handled by the same ring of CWs charged in this presentment and were lipended and finalized in the same day. Sweeney prepared a spreadsheet containing McLeod’s fraudulent transactions. [Appendix C-1]

The spreadsheet shows that McLeod was the assigned EAW on multiple payments to the same addresses used by fellow EAWs Graddick and Rice. These included: 729 Wynnewood Rd., 1302 N. 57th St., and 1238 N. 54th St. Clarence Malone’s post office box was even one of the

addresses used for McLeod's transactions. Investigator Sweeney calculated that McLeod's **83 fraudulent transactions** totaled **\$64,825**.

During CW Joanne Baker's testimony, she admitted that she conspired with EAW McLeod to enter fraudulent transactions into the LIHEAP computer system. McLeod provided her with names, SSNs and addresses and bribed her with \$50 on the spot for each application. Baker also testified that McLeod was close to CW Reels.

In addition to the findings discussed on pages 38 through 40, Officer Dwyer testified that he examined 25 applications allegedly verified by McLeod, along with 36 sheets of paper bearing McLeod's known handwriting and hand printing. Officer Dwyer made the following findings:

- McLeod signed each of the 25 applications under the worker's signature on page two of the LIHEAP application.
- McLeod filled out one application completely.
- McLeod both filled out and signed the applicant's signature on one other application.
- McLeod's fellow EAW Antonio Olivencia signed the applicant's signature on one application.
- McLeod's fellow EAW Lindsay Rice filled out and signed two of these applications.
- McLeod's fellow EAW Lindsay Rice wrote and signed a verification letter for one application.

6. Yolanda Keith

Investigator Sweeney testified that Yolanda Keith was an EAW supervisor. During the 2005-2006 heating season she supervised a small unit – just four EAWs – and also served as

LIHEAP's liaison to the Crisis unit at Philadelphia's L&I office. The evidence shows that she exploited both positions to process illegal payments from LIHEAP.

In her position as an EAW supervisor, she had the authority and computer access to lipend and enter final approvals of applications – just like a CW. The spreadsheets prepared by Agent Turner for EAWs Olivencia and Rice, both of whom were under Keith's supervision, reveal that Keith was a key player in their frauds. As EAWs, Olivencia and Rice could not carry out their scheme without the assistance of a CW or an EAW supervisor to enter information into the computer.

A review of Rice's and Olivencia's spreadsheets [A-1, A-2] demonstrates that the supposed office procedure of randomly assigning applications – first to CWs then to EAWs and then back to whatever CW picked the application out of the cardboard box – was clearly not followed. For the 2003-2004 heating season, CW Roslyn Lemay lipended all but a handful of Rice's and Olivencia's fraudulent applications. (The handful that Lemay did not do were lipended and data-entered by Tylene Holmes.) In 2004-2005, Rice and Olivencia primarily worked with timekeeper/CW Barbara Reels, but also began to conspire with Keith. By the 2005-2006 season, Olivencia was working with Keith exclusively.

In order for an EAW to make the scam work, the EAW and the person doing the lipending (normally a CW but, in this case, supervisor Yolanda Keith) had to be acting together. This was so because the EAWs involved had to be assured that the fraudulent applications did not get assigned to anyone but themselves. This was the job of the CW (or the EAW supervisor) who lipended the applications – to assign the four digit number that determined which EAW was assigned to verify the application. The EAWs also needed to know that the person doing the fraudulent lipending would not report them. Olivencia and Rice were submitting applications for

the same names, at the same addresses, and claiming the exact same salaries over and over. In addition, they were often writing the applications in their own handwriting. Anyone who was not bought off could easily detect the fraud.

For example, the spreadsheets [A-1 and A-2] reveal that, in November and December 2004, Rice had Keith lipend five applications in one month for 3066 E Street – the bar. All of these applications claimed a household income of exactly \$2,880, and all of the applications were approved for a direct cash payment of \$753. Similarly, between 12/8/05 and 2/3/06, Olivencia had Keith lipend eight applications for 3427 A Street. Almost all of the applications claimed a household income of \$1,920. During the same period, Keith lipended five applications for Olivencia for 917 N. 15th Street – again all claiming a household income of \$1,920. These transactions were not a coincidence and demonstrate that the EAWs had an arrangement with Keith, and that she was a knowing and active participant in the frauds.

Agent Turner's spreadsheets show that Keith lipended **25** fraudulent **applications** for Rice's and Olivencia's sham addresses. LIHEAP paid a total of **\$18,040** on these 25 fraudulent transactions that Keith assisted.

Investigator Sweeney also reviewed transactions and suspect applications handled by EAW supervisor Keith during the 2005-2006 season that she also served as LIHEAP's Crisis liaison. Sweeney testified he was able to determine that Keith handled fraudulent transactions because LIHEAP computer records identified her as the EAW supervisor who lipended and data-entered final approval of the applications. Sweeney identified 43 transactions that were all over \$700. Of those, he discovered 36 were lipended and data-entered the same day by Yolanda Keith. Sweeney further testified that his investigation determined that each of these transactions had bad names, addresses, SSNs, or unverifiable, unusually low income.

Keith gave these particular applications to the four EAWs that she supervised that season – one of whom was Olivencia. Sweeney interviewed all four EAW supervisees. They said Keith gave them certain applications with orders that they be done that day for Crisis (even though these were not crisis grants), rather than with the usual 30-day turnaround. Although Keith's subordinates complied with her demand, one of them, uncomfortable with this situation, would write "per supervisor's request" on the computation form. Sweeney testified that he prepared a spreadsheet for Keith's transactions (See Appendix D-1). Sweeney said he computed that the **43 fraudulent transactions** that he attributed to Yolanda Keith totaled **\$30,366**.

Several of the 43 names that appear as applicants on Sweeney's spreadsheet for Keith also happen to be associated with frauds perpetrated by three of the Crisis workers named in this presentment and discussed later. One of the Crisis workers is Glenda Lawson. According to statements given by Lawson's co-workers to Philadelphia Police Detective Charles Figorski, Lawson instructed her colleagues how they could get LIHEAP cash grants by submitting applications containing bogus social security numbers and using different addresses. She also solicited LIHEAP applications from co-workers at Chestnut Hill College, where she had a part-time job. Lawson told people that she had a "connection" at LIHEAP and she offered that she could get them LIHEAP checks in return for cash, or sometimes other forms of compensation. The spreadsheets make clear who this "connection" was. Several of the people who took Lawson up on this offer appear on the list of Keith's suspicious transactions. These include: Walter Farmer, Joyce Goodwin (Glenda Lawson's aunt), Evelyn Peters, Yvette Shamberger, and Harold Spells. (See Appendix D-1.)

Another Crisis worker, Jacqueline Jackson, made a similar offer to Theresa Holder-Stevens, who also appears on Keith's spreadsheet. The third Crisis worker, Tiffany Pendleton,

received kickbacks from Wadeedah Jenkins and Annette Martin, and their names (actually, the name of Annette Martin's dead mother) show up on Keith's spreadsheet of approved LIHEAP cash grants. This evidence fits with the statements given by Keith's EAWs to Investigator Sweeney, who recalled that she made them enter same-day approvals of LIHEAP cash benefits and told them that they were for Crisis.

In addition, Marietta Moody, testified that after the investigation started in February 2006, Keith came to her to confess a problem. Keith told Moody that, unbeknownst to her, her PECO bill had had a \$300 Crisis grant applied to it. Sweeney investigated Keith's \$300 Crisis grant. He discovered that the grant had been approved over the phone by an unknown woman who identified herself as a LIHEAP supervisor. The Crisis worker who had accepted the application by phone just happened to be Glenda Lawson. Sweeney found that Keith was ineligible for Crisis because she was never in a shutoff status that season, one of the prerequisites for eligibility, and Keith earned \$22,000 that year.

7. Roslyn Lemay

Joanne Baker testified that she and Roslyn Lemay formerly worked together as LIHEAP CWs. Baker knew that EAW Stacey Graddick paid CW Lemay to enter fraudulent application information. Lemay later told Baker that the two women ended their collusion when Graddick stopped paying Lemay. (Graddick then solicited CW Baker to enter fraudulent applications for \$50 a piece.) Baker also knew that EAW Lindsay Rice was similarly working with Lemay to enter false transactions into the LIHEAP computer. She remembered visiting Lemay's cubicle on one occasion. When Rice walked by, Lemay asked him for \$50. Baker later found out they worked together creating fraudulent applications.

Baker further testified that she observed Lemay enter numerous fraudulent transactions not only for EAWs, but also for herself. In her testimony, Baker described Lemay as a braggart who loved to talk and show off. Once, Lemay showed Baker a 3" x 5" card cupped in her hand with many names on it that Lemay indicated she was going to input in the computer even though there were no corresponding applications.

Agent Turner testified that he reviewed suspect transactions for the 2003-2004, 2004-2005, and 2005-2006 heating seasons that he identified through the LIHEAP computer identification system as entered by Lemay. Turner looked for the same "red flag" patterns such as false SSNs, multiple houses, and same-day lipend and data-entry turnaround. Out of a total of **105 transactions** worth **\$82,043**, Roslyn Lemay lipended and data-entered 97 on the same day (See Appendix E-1). Turner's investigation revealed that 45 of the transactions had bad social security numbers and used the addresses where EAWs Rice, Olivencia, Graddick, and McLeod were sending multiple LIHEAP checks.

In June 2007, Turner reviewed a partial database from the LIHEAP Tracking System. It indicated that almost every one of the transactions completed by Lemay in one day was performed in 2-3 minutes. Turner determined it would have been impossible for an EAW to have looked at, never mind verified, the suspect applications in that time period. All the transactions he reviewed had income that was either identical or unusually low and all of the wage information was unverifiable. Turner testified that, from his investigation, he determined Lemay was very active in the 2003-04 season. Agent Turner's testimony regarding the suspect addresses receiving multiple LIHEAP grants demonstrated that Lemay was involved in fraudulent activities with EAWs Olivencia, Rice, and McLeod.

8. Sheryl Allen

Investigator Sweeney testified that he reviewed CW Sheryl Allen's transactions by accessing the LIHEAP database through her confidential computer sign-on number. He found 17 transactions between 2003 and 2007 that Allen lipended and data-entered the same day. Almost all of the transactions were direct pays; all were over \$700. All of the transactions contained fictitious names, addresses, or SSNs, or had the same reported or unusually low income of \$2,400 or less. Sweeney prepared a summary spreadsheet containing transactions performed by CW Allen (See Appendix F-1). The spreadsheet lists the **17 fraudulent transactions** that Sweeney identified, resulting in a total theft from the Commonwealth of **\$13,379**.

There is significant evidence supporting Turner's conclusion that these 17 transactions were not legitimate, eligible LIHEAP applications. First, among the applications are those submitted for Kenyatta Jenkins, Stacey Graddick's fiancé, and Clarence Malone. Two of the checks are sent to familiar addresses used frequently by Rice and Graddick – 729 Wynnewood Avenue and 1302 N. 57th Street. There are two applications that are lipended by Allen on the same day (3/28/2005) for the same address (5331 Market St.), and Kevin McLeod is the assigned EAW. In fact, on a single day – March 28, 2005 – CW Allen lipended and entered final approvals on six direct cash payments, all for more than \$750. Four days earlier, she had done three others, and one the day before that (3/23/05).

9. Charlotte Ikard

Investigator Sweeney testified that he reviewed CW Charlotte Ikard's transactions by accessing the LIHEAP database through her confidential computer sign-on number. He found 16 transactions, occurring during the 2005-06 and 2006-07 heating seasons, that were lipended and

data-entered the same day. Almost all of these suspect transactions were direct pays; all were over \$700. The 16 transactions contained the familiar red flags, such as fictitious names, addresses and SSNs, or unusually low and unverifiable reported income, ranging from \$467 to \$2,880. Sweeney prepared a summary spreadsheet containing the **16 fraudulent transactions** performed by Ikard, which resulted in a theft from the Commonwealth of **\$12,118** (See Appendix G-1).

Compelling evidence supports Sweeney's conclusion that these transactions did not reflect legitimate, eligible LIHEAP applications. First, among the transactions that CW Ikard processed in just one day are two for the same addresses used frequently by Rice and Olivencia – 1316 Devereaux St. and 1809 E. Ontario St. Two of the applications that were lipended by Ikard on the same day (11/28/2005) claimed the exact same, extremely low income (\$1,920) – and Kevin McLeod is the assigned EAW. In addition, the spreadsheets for the EAWs in this case reveal that CW Ikard had a history of working with Olivencia and Keith.

10. Joyce Mills

The Grand Jury heard testimony from Investigator Sweeney concerning his review of suspect transactions conducted by CW Joyce Mills. Sweeney stated that he reviewed Mills's transactions for 2004 through 2007, accessing LIHEAP's database using Mills's confidential computer sign-on number. Sweeney identified 16 transactions lipended and data-entered the same day by Mills. Almost all of the suspect transactions were direct pays; all were over \$700. The transactions either contained fictitious names, bad addresses, bad SSNs, or had reported an unusually low income no higher than \$2,880. According to the records that Sweeney reviewed, EAW Kevin McLeod verified five of the applications. Investigator Sweeney prepared a summary

spreadsheet containing the **16 transactions** performed by Mills that he identified as fraudulent. These transactions resulted in the theft of **\$12,185** from the Commonwealth (See Appendix H-1).

Investigator Sweeney also testified about statements he obtained from two LIHEAP recipients whose applications were lipended and data-entered by Mills. Mr. Haisonn Shadding gave the first statement. According to Shadding, his very good friend Joyce Mills phoned him, soliciting him to apply for LIHEAP. Shadding told Sweeney he gave personal information over the phone to Mills. He later received a check in the mail and deposited it in his banking account. Shadding said that Mills asked for and received nothing in return. He said it was the only time Mills called him about LIHEAP. He said he had not spoken to Mills in over a year.

According to Investigator Sweeney, his investigation revealed that CWs often solicited applicants for fraudulent transactions by promising to take care of them. In return, the CWs asked for kickbacks or received other kinds of favors or gifts. Quentin Todd, a \$700 check recipient whose application was entered by Joyce Mills, gave the second statement to Sweeney. Todd stated that he did not know how he applied for LIHEAP since he did not fill out an application. He could not explain how he was sent a \$700 LIHEAP check without being eligible to receive it. He surmised that his girlfriend may have gotten the check. According to Investigator Sweeney, when Todd signed his statement, Sweeney looked up a copy of Todd's driver's license, comparing the signatures to the one on the endorsed LIHEAP check. The signatures match and are distinctive.

Significant other evidence also supports Investigator Sweeney's conclusion that Mills's 16 single-day transactions were not legitimate, eligible LIHEAP applications. First, among the applications that CW Mills processed in one day is one for Jackie Logan – Clarence Malone's stepfather. The address is 729 Wynnewood Avenue, one used frequently by EAWs Rice and

Graddick. Three of the applications that were lipended by Mills on the same day (4/5/2005) claimed the exact same, extremely low annual income (\$1,920) – and Kevin McLeod was the assigned EAW.

11. Tylenma Holmes

The Grand Jury heard testimony from Investigator Sweeney regarding his investigation of CW Tylenma Holmes. He reviewed suspect transactions by Holmes by accessing the LIHEAP database through Holmes's confidential computer sign-on number (CWOPA). He discovered 12 transactions between 2003 and 2007 that were lipended and data-entered by Holmes on the same day. Almost all of the suspect transactions were direct pays; all were over \$700. The 12 transactions either contained the same red flags – fictitious names, bad addresses, bad SSNs – or reported an unusually low, unverifiable income of \$2,460 or less. His investigation determined that EAW Kevin McLeod verified four of these transactions. Investigator Sweeney prepared a summary spreadsheet containing these transactions performed by Holmes (See Appendix I-1). These **12 fraudulent transactions** processed by Holmes added up to a total theft of **\$9,040**.

Significant other evidence was presented that supports Investigator Sweeney's conclusion that these 12 transactions by Holmes were not legitimate, eligible LIHEAP applications. First, among the applications that CW Holmes processed in one day is one for Yvonne Logan – Clarence Malone's mother. The address is 729 Wynnewood Avenue, one used frequently by EAWs Rice and Graddick. Two of the applications that were lipended by Holmes on the same

day (12/6/2004), claimed the exact same, extremely low annual income (\$1,920) – and Kevin McLeod was the assigned EAW. One was for an individual named Tyrone Holmes.¹

12. Joanne Baker

We learned from Investigator Sweeney about the fraudulent activities of CW Joanne Baker. He reviewed Baker's transactions by accessing the LIHEAP and DPW databases and finding Baker's computer sign-on number. He identified, from just one heating season (2004-2005), 52 transactions that Baker lipended and data-entered on the same day. Almost all were direct cash payments; all were over \$700. The transactions contained the same red flags – fictitious names, bad addresses, bad social security numbers – or unusually low, unverifiable income of \$2,550 or less. Investigator Sweeney prepared a summary spreadsheet containing these transactions performed by Baker in 2004-2005 (See Appendix J-1). He identified **52 fraudulent transactions** by Baker for a total fraud amount of **\$41,266**.

Investigator Sweeney also testified that he obtained statements from seven of the applicants listed in his spreadsheet. They all told the investigator that Baker solicited them to receive LIHEAP cash grants in return for kickbacks or some other form of compensation. The statements indicate that Baker at one time worked at the Why Not? salon at 2300 South 22nd Street in South Philadelphia. While employed at the salon, Baker solicited people to apply for LIHEAP. She would request customers' personal information and then data-enter it for LIHEAP benefits without requiring them to fill out applications.

¹ Jacqueline Dantzler, a former LIHEAP assistant director who reported to the District Administrator, informed the Grand Jury that, as a result of this investigation, one CW lost security access to the LIHEAP computer system. That clerk was Tylenma Holmes. Holmes was assigned to other tasks and is no longer employed by LIHEAP.

In some cases, according to Sweeney's testimony about the statements, Baker received a kickback directly from the person receiving the LIHEAP check. In other cases, after a LIHEAP check was cashed by a recipient, a man claiming to be associated with LIHEAP, sometimes accompanied by Baker, came to the recipient's house and did minimal weatherization work. The check recipient, following Baker's instructions, then paid the man the full amount of the LIHEAP check for the purported "improvements." The recipient was led to believe that the man would return any excess to LIHEAP.

The "applicants" and some of their comments to Investigator Sweeney are listed below:

- **Monique Reid** received a LIHEAP check for \$818. When Sweeney showed Reid a picture of Baker, Reid claimed she had never met the woman because the transaction was done strictly by phone.
- **Aaliyah Barnes** received a check for \$818. When Investigator Sweeney showed a picture of Baker, Barnes identified her as the LIHEAP representative.
- **Wadiyah Moore** received a check for \$818. She identified a photo of Baker as the "Joanne" she dealt with.
- **Nadisha Calhoun** received a check for \$818 that was mailed to 2041 South Norwood Street. According to the landlord for that property, Wadiyah Moore lived at the address, but Nadisha Calhoun co-signed the lease because Moore could not qualify for a lease in her own name. The PECO account for 2041 South Norwood Street is in Calhoun's name as well, although she never lived there. Calhoun told Investigator Sweeney that, at Moore's behest, she filled out a LIHEAP application for 2041 South Norwood Street. Calhoun maintained that she cashed the LIHEAP check and gave the proceeds to Moore at the Norwood property. While Calhoun was still at the residence, she witnessed Moore

give the cash to “the guy” allegedly from LIHEAP who had come to the house, checked out the electricity and wires, and collected the money from Moore.

- **Michelle Spencer** received an \$818 check. Spencer identified Baker as the “Joanne” with whom she dealt.
- **Geoffrey Thompson** received an \$818 check. When Thompson viewed a picture of Joanne Baker, he remembered her as Joanne Barns.
- **Paul Greenidge**, who lives at a house on College Avenue in Philadelphia, received a check for \$753. Greenidge identified Baker as the Joanne to whom he paid \$60.

Joanne Baker appeared before the Grand Jury. She testified that she worked as a Clerk II (CW) at LIHEAP for the heating seasons of 2000-2001 through most of 2004-2005. She testified that her job duties included opening mail, lipending applications, and data-entering applications into the LIHEAP computer system. Baker made a number of admissions to us, as follows:

- Baker admitted that she processed fraudulent applications, perhaps in the 2002-2003 season, but definitely in the 2003-2004 and 2004-2005 seasons, for family and friends in return for kickbacks. She admitted that she normally received one-half of the check amount as a kickback.
- Baker admitted that she processed fraudulent or bad transactions for EAWs. She testified that she received \$50 from EAWs for each transaction that she unlawfully processed.
- She said that she did not use actual LIHEAP applications (PWEA-1 forms) for fraudulent transactions.
- Baker testified some of the information that she included on fraudulent applications was accurate – the name, the address, and sometimes the SSN. She keyed in names and

addresses provided by her family members, friends, and acquaintances. She admitted that she falsified all the other information on the applications.

- She admitted she sometimes switched around numbers on the SSNs.
- Baker testified that she lipended and data-entered fraudulent applications on the same day, all at once, because she worried that she might not have time to do the data entry later.
- Baker testified that she keyed in annual incomes of \$1,700 to \$2,400 for the fraudulent transactions she performed so that the applicants would get the largest check they could.
- She entered “heat was included” for most of these applications in order to obtain cash for the applicant. Otherwise, the money would go to the gas or electric company.
- She testified that another LIHEAP clerk named Sherry Stallworth taught her how to process fraudulent transactions and how to “cut out the middle man,” meaning the EAWs.
- Baker said that she always used her computer when entering fraudulent transactions.
- She admitted that she processed all of the fraudulent transactions listed in Investigator Sweeney’s spreadsheet [J-1]. She indicated that she did not recognize some of the names on the list, but acknowledged that those transactions, possibly processed for EAWs who paid her, were probably fraudulent as well.
- She testified that LIHEAP applications were misfiled on purpose – just to get rid of them.
- She was frequently assigned the duty of verifying the daily confirmation list to match it against the actual applications. She said that she would normally just look to see if a name was on the list and then checked it off. She said she did not check the information on the list and believes the other CWs didn’t either. She explained that it was “tiresome

work.” She said that she found many names on confirmation lists that had no corresponding applications, but that she checked the names off anyway.

- Baker testified that she was never warned personally or generally by any supervisor about fraudulent transactions.

13. Barbara Reels

The evidence presented in the spreadsheets prepared by Agent Turner and Inspector Sweeney places Barbara Reels at the center of the conspiracy to manufacture fraudulent LIHEAP applications during heating season 2004-2005. Reels in effect replaced Roslyn Lemay as the fraudulent lipender-in-chief for EAWs Lindsay Rice and Antonio Olivencia. The spreadsheets for those two EAWs accurately reflect the central role played by the person who lipended their transactions. (See Appendix A-1, A-2.)

The fraud as carried out by Olivencia and Rice actually involved fabricating and “verifying” paper applications (as opposed to the frauds of some of the CWs, who could simply skip these steps). The key to the scheme’s success for the EAWs was to make sure that they were assigned to verify their applications’ false information. For this, they had to depend on the CW (or someone such as Reels or Keith who could perform the same function) who lipended the application. This person was therefore an important part of the conspiracy, as evidenced by the EAWs’ willingness to bribe favored CWs. That Rice and Olivencia processed almost all of their fraudulent applications through the same lipender for any given season demonstrates that that person was essential to the scheme.

Reels performed the lipending function for Rice and Olivencia’s fraudulent transactions during the 2004-2005 heating season. Agent Turner told the Grand Jury that Reels served

primarily as “timekeeper” for the LIHEAP district office. However, Reels also performed the duties of a CW when needed, even though she was not classified as a LIHEAP CW. Her duties in this respect were limited to lipending.

A spreadsheet of Reels’s transactions shows that Rice and Olivencia were not her only co-conspirators. She performed 43 additional frauds with other EAWs, as well as CWs who entered final approvals of her frauds into the LIHEAP system.

While checking the 2004-05 season, Agent Turner determined that there were only 12 days when timekeeper Reels worked full-time as a CW lipending applications. Turner testified that, during those 12 days, she lipended a total of 385 applications. Of these, 143 were direct cash payments for over \$600 each. And 100 of these transactions were attributable to either EAW Rice (52) or EAW Olivencia (48).

As an example of how blatant Reels’ fraud was: on April 11, 2005, she lipended five applications for direct cash grants. All claimed the exact the same, unbelievably low annual income of \$1,920. Three were to people with the last name of Lee. The next day she lipended four more applications for direct cash grants, all claiming the same annual income of \$2,400. Two of the “applicants” had the last name of Reavis. On March 7, 2005, Reels lipended three direct cash applications for the E Street bar used by Olivencia to receive state checks. All claimed an annual income of \$2,880. That same day, she lipended two applications for 1809 E. Ontario Street, one for 3427 A Street, and one for 4103 I Street – all addresses used by Olivencia. On January 18, 2005, she lipended 12 direct cash applications for Olivencia, almost all for his usual addresses. A review of the spreadsheet prepared by Agent Turner reveals that these are not isolated instances.

Turner determined that Reels lipended LIHEAP transactions on behalf of Rice and Olivencia in the amount of \$74,109. Agent Turner identified **143 fraudulent direct cash applications** lipended by Reels that resulted in the theft of **\$105,553** from the Commonwealth (See Appendix K-1).

14. Glenda Lawson

Glenda Lawson was a “Crisis screener” – she worked in Philadelphia’s L&I office, which administered the program for low-income households at imminent risk of losing their heat. However, the evidence shows that Lawson conspired not only with Crisis recipients, but also with LIHEAP supervisor Yolanda Keith, to procure fraudulent LIHEAP cash benefits and kickbacks for herself.

Philadelphia Police Detective Charles Figorski testified about his investigation of Lawson. The detective obtained statements from three Crisis co-workers: data service support clerks Catherine Ham and Rashonda Corley (who were, roughly, the Crisis equivalent of CWs); and screener Cassandra Shamberger (with responsibilities similar to an EAW), who later became Lawson’s supervisor. Ham and Corley were responsible for data entry at Crisis while Shamberger processed applications. Detective Figorski testified that:

- Ham told the detective that at least four Crisis workers, including Glenda Lawson, Carmelita Scott, Cassandra Shamberger, and Joanne Robinson, frequently went to Catherine Ham and instructed Ham to enter applications in violation of known office policy. The detective’s investigation determined that Crisis policy dictated that applications be placed in bins labeled PGW, PECO, Water, or Rejections. Ham told

Figorski that Corley warned Ham about circumventing the process for entering applications into the Crisis computer system.

- According to Ham, three Crisis workers – Glenda Lawson, Carmelita Scott, and Joanne Robinson – were filling out Crisis applications together at a bar one night.
- Shamberger told the detective that Lawson told her that she could receive a cash grant from LIHEAP by submitting an application with a bogus SSN. Detective Figorski determined that, in fact, Cassandra Shamberger did obtain a LIHEAP cash grant using a bogus SSN.
- Shamberger told the detective that Lawson instructed her on how to obtain more LIHEAP and Crisis benefits by using different addresses on applications. Lawson also told Shamberger that she had a connection inside LIHEAP.

Detective Figorski's investigation revealed that Lawson worked part-time at Chestnut Hill College's security department. He obtained statements from Lawson's supervisor and two co-workers at Chestnut Hill College (CHC). The statements indicate that Lawson solicited CHC employees to apply for LIHEAP and/or Crisis benefits. If they accepted the offer, she asked for their personal information and later filled out applications. The detective also obtained statements from Crisis co-workers, relatives, and friends of Lawson who stated that she filled out and shepherded LIHEAP applications through the system on their behalf. In return, Lawson received kickbacks in the form of cash or gifts.

Detective Figorski summarized information regarding his investigation of LIHEAP and/or Crisis recipients who participated in Lawson's fraudulent schemes:

- **Walter Farmer.** Lawson's supervisor at CHC, stated that he paid \$75 to Lawson once. In return, he received credits of between \$600 and \$1,000 on his gas and electric bills on

eight separate occasions. Farmer told Det. Figorski that he knew he did not qualify for LIHEAP benefits but that Glenda Lawson adjusted his income on the application so that he did qualify. As a result of Lawson's actions, Farmer received a total of \$3,090 in unwarranted LIHEAP benefits.

- **Harold Spells**, a CHC employee, informed Det. Figorski that he paid Lawson \$100 on two separate occasions for her assistance in obtaining LIHEAP benefits for him twice in one year. Spells stated that he also gave Lawson a wedding present of \$100 cash. As a result of Lawson's actions, Spells received a total of \$2,418 in unwarranted LIHEAP benefits.
- **Shirley Logan**, a CHC receptionist, informed Det. Figorski that she received LIHEAP benefits as a result of Lawson filling out Crisis applications on her behalf. Lawson also negotiated a PGW shut-off delay for Logan. Logan said that she gave Lawson a set of napkins one Christmas and donated clothing for Lawson's family in Costa Rica. Logan told Figorski she made the contribution out of gratitude for Lawson's help. As a result of Lawson's actions, Logan received a total of \$1,610 in LIHEAP benefits.
- **Nikiya Newton**, a former Crisis worker, told Det. Figorski that she agreed to deposit two LIHEAP checks payable to Glenda Lawson into her Wachovia bank account. In a signed statement, Newton told the detective that she withdrew \$700 in cash for one of the checks and gave Lawson \$600. Lawson gave her \$50 the first time this happened and \$100 the second time.
- **Joyce Goodwin**, Glenda Lawson's aunt and a former registered nurse employed by the City of Philadelphia, told Det. Figorski that she permitted Lawson to fill out LIHEAP applications on two occasions for her. This resulted in a credit on her PECO account. In

addition, at least two Crisis checks, payable to Glenda Lawson, were forwarded to Goodwin's rental property, even though Det. Figorski's investigation determined that Goodwin's utility account was never in danger of shutoff. As a result of Lawson's actions, Goodwin received a total of \$2,000 in unwarranted LIHEAP and Crisis benefits at her address.

- **Evelyn Peters**, a Temple University employee, admitted that she agreed to exchange luxury handbags for Crisis benefits engineered by Lawson. For the first such "transaction," Peters gave luggage and two handbags to Lawson in exchange for a \$300 credit toward her electric bill. According to Peters, there were two or three similar exchanges. As a result of Lawson's actions, Peters received a total of \$2,353 in unwarranted benefits.
- **Pearl Christie**, a Crisis intake worker, admitted to Det. Figorski that she gave personal information to Lawson, who promised a check would be arriving at Christie's house. Lawson monitored the check's arrival by calling Christie and picked the envelope up when it arrived. In exchange, Christie admitted that she received a \$300 Crisis utility credit for a year. The check that Lawson received at Christie's house was for \$781, made payable to Glenda Lawson.
- **Rhonda Simmons** told Det. Figorski that she provided personal information to Lawson, but did not fill out a LIHEAP application or submit a landlord statement. Lawson, however, submitted one for her, and Simmons received a LIHEAP check. Simmons said that she did not know whether this was Lawson's repayment for Simmons's helping Lawson's sister apply legitimately for a FEMA grant. As a result of Lawson's actions, Simmons received an unwarranted LIHEAP check for \$760.

According to the spreadsheet that is attached as Appendix D-1, LIHEAP supervisor Yolanda Keith lipended – and approved the same day – fraudulent applications for several recipients of the checks procured by Lawson: for Walter Farmer, Joyce Goodwin, Evelyn Peters, Yvette Shamberger (for Crisis worker Cassandra Shamberger), and Harold Spells. Investigator Sweeney testified that Lawson, in turn, data-entered approval of a fraudulent \$300 Crisis grant for Yolanda Keith.

Detective Figorski prepared a spreadsheet listing LIHEAP and Crisis benefits stolen through Lawson's actions. His chart is based on monetary reports that he received from the Office of the Inspector General, as well as from Agent Turner and Investigator Sweeney. The total amount received by LIHEAP and Crisis recipients as a result Glenda Lawson's frauds is \$13,765 (See Attachment L-1).

15. Jacqueline Jackson

Jacqueline Jackson testified before the Grand Jury. Jackson stated that she was employed by Crisis during the 2004-2005 and 2005-2006 heating seasons as a Data Service Support Clerk. She also was a substitute Crisis supervisor, according to a Crisis co-worker, Rashonda Corley. During the Crisis season, Jackson processed applications after they arrived from neighborhood outreach centers. Jackson testified that she keyed information into the Crisis/LIHEAP computer system, verified application information, and personally made eligibility determinations on applicants for Crisis funds.

Jackson further testified that she owned and lived at 4437 North 9th Street, Philadelphia, during that time with her adult son, Jackie Jamal Davis. Jackson admitted that, in February 2006, she applied for a LIHEAP cash grant using a fraudulent SSN and submitting a fabricated income

letter in which she indicated an annual income of \$2,400. Had she stated her true income of approximately \$35,000, she would have been ineligible for LIHEAP. Jackson admitted that, as a result of her fraudulent application, she received a \$719 LIHEAP check in her name.

The check was mailed to 2035 North 9th Street in Philadelphia, which was the address of Theresa Holder-Stevens, a Philadelphia city employee at the time. Jackson said that Holder-Stevens told her when the check arrived, and that Jackson retrieved it and then cashed it. Jackson explained that she used Holder-Stevens's home as a mailing address because she knew that her son had already received fraudulently obtained LIHEAP benefits, which are limited to one payment per household.

Jackson admitted that she reciprocated for Holder-Stevens's assistance by submitting and processing two fraudulent LIHEAP applications in Holder-Stevens's name. This generosity with the State's money resulted in payments to Holder-Stevens of a \$781 LIHEAP check and Crisis payments in 2005 and 2006 of \$300 and \$600, respectively.

Jackson made some additional admissions to the Grand Jury:

- Jackson admitted that she received LIHEAP and Crisis benefits at 4437 North 9th through her son, Jackie Jamal, by including a fabricated income letter claiming a \$2,400 annual income when, in fact, her son was working full-time for Citizens Bank. Jackson's deceit resulted in a \$753 LIHEAP vendor payment to her PGW bill in March 2005 and a \$700 LIHEAP vendor payment that was applied to her PECO bill in December 2005.
- By means of the fraudulent applications submitted on behalf of her son, Ms. Jackson also received a \$300 credit toward her PGW bill in December 2004 and a \$300 credit toward her PECO bill in February 2006.
- In May 2006, Jackson received an additional \$72 credit on her PECO bill.

- Jackson admitted she received a new heater, installed in her home in December 2005, through the weatherization program. The Crisis program was billed \$3,525 for the heater.
- Jackson admitted to the Grand Jury she was not eligible for any of the benefits she received.

According to the spreadsheet that is attached as Appendix D-1, Yolanda Keith lipended – and approved the same day – the fraudulent LIHEAP cash application that Jackson arranged for Theresa Holder-Stevens.

Detective Figorski introduced a spreadsheet listing Jackson’s fraudulent transactions while working at Crisis. The benefits Jackson stole totaled **\$8,159** (See Appendix M-1).

16. Tiffany Pendleton

As part of his investigation, Detective Figorski also focused on former Crisis worker Tiffany Pendleton. Figorski testified that he conducted interviews with three women who paid Pendleton so that she would assist them in obtaining fraudulent Crisis and weatherization benefits. Det. Figorski testified about their statements as follows:

- **Annette Martin** informed Det. Figorski that she learned from her friend, Wadeedah Jenkins, that Pendleton could obtain LIHEAP benefits for a fee.
- Martin admitted that, in 2006, she gave \$100 and a gas utility bill to Pendleton through Jenkins. The bill, at the time, was in the name of Martin’s mother, Emma Martin. As a result, numerous LIHEAP and Crisis payments were credited to Emma’s gas bill because Emma’s gas account received numerous shut-off notices. Annette Martin admitted to Det.

Figorski that her mother had died in September 2005. Annette Martin changed the name on the bill to her own name when the utilities became aware of Emma's death.

- Once Martin re-titled the gas bill in her own name, she enlisted Jenkins's help again. Martin made several cash payments to Jenkins, intending that Jenkins forward the cash to Pendleton. Martin has since received two LIHEAP vendor payments directed to PGW. Although her PECO account was credited with a Crisis payment on 5/23/06, Martin said she never had a PECO shutoff notice.
- Annette Martin believed she was ineligible for LIHEAP or Crisis benefits. Martin told Det. Figorski that Wadeedah Jenkins acted as her intermediary with Tiffany Pendleton.
- **Wadeedah Jenkins** admitted to Det. Figorski that Pendleton secured LIHEAP benefits on her behalf. Included in those benefits was a new heater worth \$3,400. The heater was installed in December 2005 at 545 East Malan Street in Philadelphia as part of the weatherization program. In Jenkins's sworn statement to the detective, she admitted that she paid Pendleton \$600 for the heater.
- **Crystal Alexander** operated a hair salon called "Crystal's Palace" in North Philadelphia. Det. Figorski stated that, based on his investigation, Alexander's hair salon "was a place where business was transacted."
- Alexander admitted that she paid Pendleton \$100 on each of two separate occasions for assistance in receiving LIHEAP benefits.
- Alexander further admitted that she recommended several of her friends to Pendleton for benefit assistance.
- Det. Figorski testified that both Jenkins and Alexander identified Pendleton from a photographic display.

According to the spreadsheet that is attached as Appendix D-1, Yolanda Keith lipended – and approved the same day – the fraudulent LIHEAP cash application that Pendleton arranged for Annette Martin’s dead mother, Emma, and Wadeedah Jenkins.

The total cost to the Commonwealth of the identified fraudulent transactions perpetrated by Tiffany Pendleton and the three women described above was **\$8,077** (See Appendix N-1).

17. Cassandra Shamberger

Cassandra Shamberger worked at Crisis during the 2004-2005, 2005-2006, and 2006-2007 heating seasons. She became a Crisis supervisor during the 2006-07 season until she resigned. Det. Figorski obtained a signed statement from Shamberger in which she confessed that, while working at Crisis, she obtained illegal benefits for herself, her sisters, and a friend. A summary of Shamberger’s statement to Det. Figorski follows:

- Under the tutelage of Crisis co-worker Glenda Lawson, Shamberger prepared her own application for Crisis and LIHEAP benefits, using a false SSN and no pay stubs or verifying letters. Shamberger gave the application to Lawson, who said she had a LIHEAP connection. Shamberger later received a check for over \$700, which she used to pay bills. After Lawson informed Shamberger that she was supposed to pay Lawson for her efforts, Shamberger gave Lawson \$50 to \$100.
- In 2004 or 2005, again pursuant to Glenda Lawson’s instructions, Shamberger filled out and signed an application using her sister Gail Shamberger’s address – 2213 West Tioga Street, Philadelphia. Shamberger stated she did not attach any verifying information. On the fraudulent application, Shamberger identified “kerosene” as her primary heat. as instructed by Lawson. Shamberger listed kerosene because Lawson had kerosene

receipts. Shamberger gave the completed application to Lawson, and her sister Gail received an illegal \$320 direct cash payment from LIHEAP.

- During both the 2004-05 and 2005-06 seasons, Shamberger filled out and submitted to Crisis one or two fraudulent applications each for herself, her sisters Gail and Adrian, and a friend, Donna Crawford.
- Shamberger also admitted that she received benefits under the name Yvette

Shamberger, knowing she was not entitled to them. Shamberger testified that she paid for Lawson's assistance.

Detective Figorski prepared a spreadsheet listing LIHEAP and Crisis recipient benefits based on Shamberger's actions and her conspiratorial actions with Crisis worker Glenda Lawson. The total amount received by recipients aided by Shamberger and Lawson's conspiracy is **\$4,443** (See Appendix O-1).

RECOMMENDED CHARGES

We, County Investigating Grand Jury XXII, recommend that ANTONIO OLIVENCIA, LINDSAY RICE, NORMA ORTOLAZA, CLARENCE MALONE, STACEY GRADDICK, KEVIN MCLEOD, YOLANDA KEITH, ROSLYN LEMAY, SHERYL ALLEN, CHARLOTTE IKARD, JOYCE MILLS, TYLENMA HOLMES, JOANNE BAKER, BARBARA REELS a/k/a BOBBY REELS, GLENDA LAWSON, JACQUELINE JACKSON, TIFFANEY PENDLETON, and CASSANDRA SHAMBERGER be charged with the following offenses respectively:

ANTONIO OLIVENCIA

Welfare Fraud, 62 P.S. § 481 (1 count) (F-3)
Criminal Conspiracy, 18 Pa.C.S. § 903 (1 count) (F-3)
Theft by Unlawful Taking or Disposition, 18 Pa.C.S. § 3921 (1 count) (F-3)
Theft by Deception, 18 Pa.C.S. § 3922 (1 count) (F-3)
Forgery, 18 Pa.C.S. § 4101 (103 counts) (F-3)
Identity Theft, 18 Pa.C.S. § 4120 (1 count) (F-3)
Bribery in Official and Political Matters, 18 Pa.C.S. § 4701 (103 counts) (F-3)
Tampering with Public Records or Information, 18 Pa.C.S. § 4911 (103 counts) (F-3)
Unlawful Use of Computer, 18 Pa.C.S. § 7611 (103 counts) (F-3)

LINDSAY RICE

Welfare Fraud, 62 P.S. § 481 (1 count) (F-3)
Criminal Conspiracy, 18 Pa.C.S. § 903 (1 count) (F-3)
Theft by Unlawful Taking or Disposition, 18 Pa.C.S. § 3921 (1 count) (F-3)
Theft by Deception, 18 Pa.C.S. § 3922 (1 count) (F-3)
Forgery, 18 Pa.C.S. § 4101 (87 counts) (F-3)
Identity Theft, 18 Pa.C.S. § 4120 (1 count) (F-3)
Bribery in Official and Political Matters, 18 Pa.C.S. § 4701 (87 counts) (F-3)
Tampering with Public Records or Information, 18 Pa.C.S. § 4911 (87 counts) (F-3)
Unlawful Use of Computer, 18 Pa.C.S. § 7611 (87 counts) (F-3)

NORMA ORTOLAZA

Welfare Fraud, 62 P.S. § 481 (1 count) (F-3)
Criminal Conspiracy, 18 Pa.C.S. § 903 (1 count) (F-3)
Theft by Unlawful Taking or Disposition, 18 Pa.C.S. § 3921 (1 count) (F-3)
Theft by Deception, 18 Pa.C.S. § 3922 (1 count) (F-3)
Forgery, 18 Pa.C.S. § 4101 (138 counts) (F-3)
Identity Theft, 18 Pa.C.S. § 4120 (1 count) (F-3)
Bribery in Official and Political Matters, 18 Pa.C.S. § 4701 (138 counts) (F-3)
Tampering with Public Records or Information, 18 Pa.C.S. § 4911 (138 counts) (F-3)
Unlawful Use of Computer, 18 Pa.C.S. § 7611 (138 counts) (F-3)

CLARENCE MALONE

Welfare Fraud, 62 P.S. § 481 (1 count) (F-3)
Criminal Conspiracy, 18 Pa.C.S. § 903 (1 count) (F-3)
Theft by Unlawful Taking or Disposition, 18 Pa.C.S. § 3921 (1 count) (F-3)
Theft by Deception, 18 Pa.C.S. § 3922 (1 count) (F-3)
Forgery, 18 Pa.C.S. § 4101 (14 counts) (F-3)
Identity Theft, 18 Pa.C.S. § 4120 (1 count) (F-3)
Bribery in Official and Political Matters, 18 Pa.C.S. § 4701 (14 counts) (F-3)
Tampering with Public Records or Information, 18 Pa.C.S. § 4911 (14 counts) (F-3)
Unlawful Use of Computer, 18 Pa.C.S. § 7611 (14 counts) (F-3)

STACEY GRADDICK

Welfare Fraud, 62 P.S. § 481 (1 count) (F-3)
Criminal Conspiracy, 18 Pa.C.S. § 903 (1 count) (F-3)
Theft by Unlawful Taking or Disposition, 18 Pa.C.S. § 3921 (1 count) (F-3)
Theft by Deception, 18 Pa.C.S. § 3922 (1 count) (F-3)
Forgery, 18 Pa.C.S. § 4101 (51 counts) (F-3)
Identity Theft, 18 Pa.C.S. § 4120 (1 count) (F-3)
Bribery in Official and Political Matters, 18 Pa.C.S. § 4701 (51 counts) (F-3)
Tampering with Public Records or Information, 18 Pa.C.S. § 4911 (51 counts) (F-3)
Unlawful Use of Computer, 18 Pa.C.S. § 7611 (51 counts) (F-3)

KEVIN MCLEOD

Welfare Fraud, 62 P.S. § 481 (1 count) (F-3)
Criminal Conspiracy, 18 Pa.C.S. § 903 (1 count) (F-3)
Theft by Unlawful Taking or Disposition, 18 Pa.C.S. § 3921 (1 count) (F-3)
Theft by Deception, 18 Pa.C.S. § 3922 (1 count) (F-3)
Forgery, 18 Pa.C.S. § 4101 (83 counts) (F-3)
Identity Theft, 18 Pa.C.S. § 4120 (1 count) (F-3)
Bribery in Official and Political Matters, 18 Pa.C.S. § 4701 (83 counts) (F-3)
Tampering with Public Records or Information, 18 Pa.C.S. § 4911 (83 counts) (F-3)
Unlawful Use of Computer, 18 Pa.C.S. § 7611 (83 counts) (F-3)

YOLANDA KEITH

Welfare Fraud, 62 P.S. § 481 (1 count) (F-3)
Criminal Conspiracy, 18 Pa.C.S. § 903 (1 count) (F-3)
Theft by Unlawful Taking or Disposition, 18 Pa.C.S. § 3921 (1 count) (F-3)
Theft by Deception, 18 Pa.C.S. § 3922 (1 count) (F-3)
Forgery, 18 Pa.C.S. § 4101 (43 counts) (F-3)
Identity Theft, 18 Pa.C.S. § 4120 (1 count) (F-3)
Bribery in Official and Political Matters, 18 Pa.C.S. § 4701 (43 counts) (F-3)
Tampering with Public Records or Information, 18 Pa.C.S. § 4911 (43 counts) (F-3)
Unlawful Use of Computer, 18 Pa.C.S. § 7611 (43 counts) (F-3)

ROSLYN LEMAY

Welfare Fraud, 62 P.S. § 481 (1 count) (F-3)
Criminal Conspiracy, 18 Pa.C.S. § 903 (1 count) (F-3)
Theft by Unlawful Taking or Disposition, 18 Pa.C.S. § 3921 (1 count) (F-3)
Theft by Deception, 18 Pa.C.S. § 3922 (1 count) (F-3)
Forgery, 18 Pa.C.S. § 4101 (45 counts) (F-3)
Identity Theft, 18 Pa.C.S. § 4120 (1 count) (F-3)
Bribery in Official and Political Matters, 18 Pa.C.S. § 4701 (45 counts) (F-3)
Tampering with Public Records or Information, 18 Pa.C.S. § 4911 (45 counts) (F-3)
Unlawful Use of Computer, 18 Pa.C.S. § 7611 (45 counts) (F-3)

SHERYL ALLEN

Welfare Fraud, 62 P.S. § 481 (1 count) (F-3)
Criminal Conspiracy, 18 Pa.C.S. § 903 (1 count) (F-3)
Theft by Unlawful Taking or Disposition, 18 Pa.C.S. § 3921 (1 count) (F-3)
Theft by Deception, 18 Pa.C.S. § 3922 (1 count) (F-3)
Forgery, 18 Pa.C.S. § 4101 (17 counts) (F-3)
Identity Theft, 18 Pa.C.S. § 4120 (1 count) (F-3)
Bribery in Official and Political Matters, 18 Pa.C.S. § 4701 (17 counts) (F-3)
Tampering with Public Records or Information, 18 Pa.C.S. § 4911 (17 counts) (F-3)
Unlawful Use of Computer, 18 Pa.C.S. § 7611 (17 counts) (F-3)

CHARLOTTE IKARD

Welfare Fraud, 62 P.S. § 481 (1 count) (F-3)
Criminal Conspiracy, 18 Pa.C.S. § 903 (1 count) (F-3)
Theft by Unlawful Taking or Disposition, 18 Pa.C.S. § 3921 (1 count) (F-3)
Theft by Deception, 18 Pa.C.S. § 3922 (1 count) (F-3)
Forgery, 18 Pa.C.S. § 4101 (16 counts) (F-3)
Identity Theft, 18 Pa.C.S. § 4120 (1 count) (F-3)
Bribery in Official and Political Matters, 18 Pa.C.S. § 4701 (16 counts) (F-3)
Tampering with Public Records or Information, 18 Pa.C.S. § 4911 (16 counts) (F-3)
Unlawful Use of Computer, 18 Pa.C.S. § 7611 (16 counts) (F-3)

JOYCE MILLS

Welfare Fraud, 62 P.S. § 481 (1 count) (F-3)
Criminal Conspiracy, 18 Pa.C.S. § 903 (1 count) (F-3)
Theft by Unlawful Taking or Disposition, 18 Pa.C.S. § 3921 (1 count) (F-3)
Theft by Deception, 18 Pa.C.S. § 3922 (1 count) (F-3)
Forgery, 18 Pa.C.S. § 4101 (16 counts) (F-3)
Identity Theft, 18 Pa.C.S. § 4120 (1 count) (F-3)
Bribery in Official and Political Matters, 18 Pa.C.S. § 4701 (16 counts) (F-3)
Tampering with Public Records or Information, 18 Pa.C.S. § 4911 (16 counts) (F-3)
Unlawful Use of Computer, 18 Pa.C.S. § 7611 (16 counts) (F-3)

TYLENMA HOLMES

Welfare Fraud, 62 P.S. § 481 (1 count) (F-3)
Criminal Conspiracy, 18 Pa.C.S. § 903 (1 count) (F-3)
Theft by Unlawful Taking or Disposition, 18 Pa.C.S. § 3921 (1 count) (F-3)
Theft by Deception, 18 Pa.C.S. § 3922 (1 count) (F-3)
Forgery, 18 Pa.C.S. § 4101 (12 counts) (F-3)
Identity Theft, 18 Pa.C.S. § 4120 (1 count) (F-3)
Bribery in Official and Political Matters, 18 Pa.C.S. § 4701 (12 counts) (F-3)
Tampering with Public Records or Information, 18 Pa.C.S. § 4911 (12 counts) (F-3)
Unlawful Use of Computer, 18 Pa.C.S. § 7611 (12 counts) (F-3)

JOANNE BAKER

Welfare Fraud, 62 P.S. § 481 (1 count) (F-3)
Criminal Conspiracy, 18 Pa.C.S. § 903 (1 count) (F-3)
Theft by Unlawful Taking or Disposition, 18 Pa.C.S. § 3921 (1 count) (F-3)
Theft by Deception, 18 Pa.C.S. § 3922 (1 count) (F-3)
Forgery, 18 Pa.C.S. § 4101 (52 counts) (F-3)
Identity Theft, 18 Pa.C.S. § 4120 (1 count) (F-3)
Bribery in Official and Political Matters, 18 Pa.C.S. § 4701 (52 counts) (F-3)
Tampering with Public Records or Information, 18 Pa.C.S. § 4911 (52 counts) (F-3)
Unlawful Use of Computer, 18 Pa.C.S. § 7611 (52 counts) (F-3)

BARBARA REELS a/k/a BOBBY REELS

Welfare Fraud, 62 P.S. § 481 (1 count) (F-3)
Criminal Conspiracy, 18 Pa.C.S. § 903 (1 count) (F-3)
Theft by Unlawful Taking or Disposition, 18 Pa.C.S. § 3921 (1 count) (F-3)
Theft by Deception, 18 Pa.C.S. § 3922 (1 count) (F-3)
Forgery, 18 Pa.C.S. § 4101 (143 counts) (F-3)
Identity Theft, 18 Pa.C.S. § 4120 (1 count) (F-3)
Bribery in Official and Political Matters, 18 Pa.C.S. § 4701 (143 counts) (F-3)
Tampering with Public Records or Information, 18 Pa.C.S. § 4911 (143 counts) (F-3)
Unlawful Use of Computer, 18 Pa.C.S. § 7611 (143 counts) (F-3)

GLENDALAWSON

Welfare Fraud, 62 P.S. § 481 (1 count) (F-3)
Criminal Conspiracy, 18 Pa.C.S. § 903 (1 count) (F-3)
Theft by Unlawful Taking or Disposition, 18 Pa.C.S. § 3921 (1 count) (F-3)
Theft by Deception, 18 Pa.C.S. § 3922 (1 count) (F-3)
Forgery, 18 Pa.C.S. § 4101 (31 counts) (F-3)
Identity Theft, 18 Pa.C.S. § 4120 (1 count) (F-3)
Bribery in Official and Political Matters, 18 Pa.C.S. § 4701 (31 counts) (F-3)
Tampering with Public Records or Information, 18 Pa.C.S. § 4911 (31 counts) (F-3)
Unlawful Use of Computer, 18 Pa.C.S. § 7611 (31 counts) (F-3)

JACQUELINE JACKSON

Welfare Fraud, 62 P.S. § 481 (1 count) (F-3)
Criminal Conspiracy, 18 Pa.C.S. § 903 (1 count) (F-3)
Theft by Unlawful Taking or Disposition, 18 Pa.C.S. § 3921 (1 count) (F-3)
Theft by Deception, 18 Pa.C.S. § 3922 (1 count) (F-3)
Forgery, 18 Pa.C.S. § 4101 (12 counts) (F-3)
Identity Theft, 18 Pa.C.S. § 4120 (1 count) (F-3)
Bribery in Official and Political Matters, 18 Pa.C.S. § 4701 (12 counts) (F-3)
Tampering with Public Records or Information, 18 Pa.C.S. § 4911 (12 counts) (F-3)
Unlawful Use of Computer, 18 Pa.C.S. § 7611 (12 counts) (F-3)

TIFFANEY PENDLETON

Welfare Fraud, 62 P.S. § 481 (1 count) (F-3)
Criminal Conspiracy, 18 Pa.C.S. § 903 (1 count) (F-3)
Theft by Unlawful Taking or Disposition, 18 Pa.C.S. § 3921 (1 count) (F-3)
Theft by Deception, 18 Pa.C.S. § 3922 (1 count) (F-3)
Forgery, 18 Pa.C.S. § 4101 (16 counts) (F-3)
Identity Theft, 18 Pa.C.S. § 4120 (1 count) (F-3)
Bribery in Official and Political Matters, 18 Pa.C.S. § 4701 (16 counts) (F-3)
Tampering with Public Records or Information, 18 Pa.C.S. § 4911 (16 counts) (F-3)
Unlawful Use of Computer, 18 Pa.C.S. § 7611 (16 counts) (F-3)

CASSANDRA SHAMBERGER

Welfare Fraud, 62 P.S. § 481 (1 count) (F-3)

Criminal Conspiracy, 18 Pa.C.S. § 903 (1 count) (F-3)

Theft by Unlawful Taking or Disposition, 18 Pa.C.S. § 3921 (1 count) (F-3)

Theft by Deception, 18 Pa.C.S. § 3922 (1 count) (F-3)

Forgery, 18 Pa.C.S. § 4101 (12 counts) (F-3)

Identity Theft, 18 Pa.C.S. § 4120 (1 count) (F-3)

Bribery in Official and Political Matters, 18 Pa.C.S. § 4701 (12 counts) (F-3)

Tampering with Public Records or Information, 18 Pa.C.S. § 4911 (12 counts) (F-3)

Unlawful Use of Computer, 18 Pa.C.S. § 7611 (12 counts) (F-3)