

UNITED STATES DISTRICT COURT

for the
District of New Jersey

ORIGINAL FILED
JUN 18 2019
WILLIAM T. WALSH CLERK

United States of America
v.
ROBERT S. ARMSTRONG

Case No.
19-5553 (KMW)

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 3-6-19, 3-7-19 and 3-11-19 in the county of Gloucester in the
District of New Jersey, the defendant(s) violated:

Code Section
18 U.S.C. Sections 1341

Offense Description
Three counts of mail fraud, more fully described in Attachment A.

This criminal complaint is based on these facts:

See Attachment B.

Continued on the attached sheet.

Complainant's signature

Alexander Sylvester, United States Postal Inspector
Printed name and title

Sworn to before me and signed in my presence.

Date: 06/18/2019

Judge's signature

City and state: Camden, New Jersey

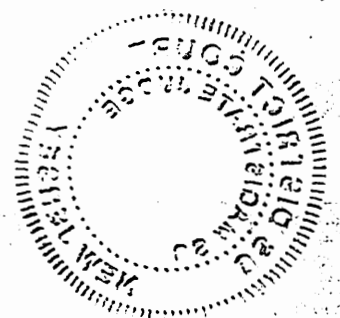
Hon. Karen M. Williams, U.S. Magistrate Judge
Printed name and title

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[Handwritten signature]



CONTENTS APPROVED

UNITED STATES ATTORNEY

By: 

DIANA VONDRA CARRIG
Assistant U.S. Attorney

Date: June 18, 2019

ATTACHMENT A

The Defendant

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

The Object of the Scheme and Artifice

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

ROBERT S. ARMSTRONG

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

The Object of the Scheme and Artifice

3. The object of the scheme and artifice to defraud was for defendant ROBERT S. ARMSTRONG to obtain money from doctors’ offices, medical clinics and hospitals

throughout the United States (hereinafter, the “Medical Providers”) by issuing false and fraudulent invoices to the Medical Providers for medical supplies and other materials, including but not limited to diabetic test strips, EpiPens® and sanitizing wipes (hereinafter, “medical supplies”), which had never been ordered or received by the Medical Providers.

The Defendant’s Scheme

4. As part of the scheme to defraud, defendant ROBERT S. ARMSTRONG prepared invoices which sought payment in amounts such as \$252, \$240 and \$282 for medical supplies which the Medical Providers had neither ordered nor received. The invoices contained false and fraudulent information including but not limited to a demand for payment for medical supplies which had neither been ordered or received by the Medical Providers, fraudulent shipping information pertaining to the medical supplies and a fraudulent address.
5. It was further part of the scheme and artifice to defraud that defendant ROBERT S. ARMSTRONG contracted with a bulk mailing company to mail via U.S. Mail the fraudulent invoices to thousands of Medical Providers throughout the United States.
6. It was further part of the scheme and artifice to defraud that defendant ROBERT S. ARMSTRONG caused the invoices to contain return envelopes bearing the address of either of the two mail boxes in Melbourne, Florida or Dallas, Texas to induce the Medical Providers to mail payments for the non-existent medical supplies back to ROBERT S. ARMSTRONG.
7. It was further part of the scheme and artifice to defraud that defendant ROBERT S. ARMSTRONG received checks from the Medical Providers and at times deposited and caused to be deposited such checks into the Pinnacle Medical Supply bank account. As

of May 9, 2019, approximately 169 Medical Providers sent checks to Pinnacle Medical Supply totaling approximately \$43,248, which defendant ROBERT S. ARMSTRONG deposited or caused to be deposited into the Pinnacle Medical Supply bank account.

8. On or about the dates listed below, for the purpose of executing the aforesaid scheme and artifice, in Gloucester County, in the District of New Jersey and elsewhere, the defendant,

ROBERT S. ARMSTRONG,

did knowingly and with fraudulent intent cause to be placed in a post office and

authorized depository for mail, and cause to be delivered in accordance with the

directions thereon, certain mail matter as more fully described below, to be sent and

delivered by the United States Postal Service or by a private or commercial interstate

carrier as specified per count, for the purpose of executing such scheme and artifice:

COUNT	DATE	FROM	METHOD OF MAILING	ITEM
1	3-7-19	Victim 1 located in Bethlehem, PA	Mailed Check	Check issued by Victim 1 in the amount of \$282, check number 109548 mailed to Pinnacle Medical Supply at the Melbourne, Florida mail box
2	3-6-19	Victim 2 located in Wilmington, DE	Mailed Check	Check issued by Victim 2 in the amount of \$282, check number 65638 mailed to Pinnacle Medical Supply at the Melbourne, Florida mail box
3	3-11-19	Victim 3 located in Jefferson City, MO	Mailed Check	Check issued by Victim 3 in the amount of \$282, check number 23262 mailed to Pinnacle Medical Supply at the Melbourne, Florida mail box

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

ATTACHMENT B

I, Alexander Sylvester, being duly sworn depose and state the following:

INTRODUCTION

1. I am currently employed as a United States Postal Inspector in Bellmawr, New Jersey, and I have been employed as a Postal Inspector for approximately 15 years. My duties as a Postal Inspector consist of investigating persons and entities alleged to have committed federal criminal violations. In my capacity as a Postal Inspector, I have employed many forms of investigative techniques, including the review of materials submitted by financial institutions and other sources. I have participated in and conducted numerous complex criminal fraud investigations, including mail fraud and money laundering cases. Through my training and experience, I am knowledgeable about the United States laws which apply to criminal fraud.

2. Because this affidavit is submitted for the limited purpose of establishing probable cause for a criminal complaint, I have not included every detail of the investigation. Rather, I have set forth only those facts necessary to establish probable cause to believe that Robert S. Armstrong committed three counts of mail fraud, in violation of 18 U.S.C. § 1341.

3. The information contained in this affidavit is based upon my personal knowledge and observations, conversations with other law enforcement officers, witness interviews and the review of documents. Unless specifically indicated, all conversations and statements described in this affidavit are related in substance and in part.

4. As described more fully herein, there is probable cause to believe that Robert S. Armstrong engaged in a scheme to defraud doctor's offices and medical clinics (hereinafter "doctor's offices") across the United States. Specifically, Armstrong caused the

mailing of false and fraudulent invoices on behalf of his company, Pinnacle Medical Supply,¹ which invoices included an addressed return envelope for the doctor's offices to mail their payment. By billing for products not ordered or received, Armstrong caused the doctor's offices to mail payments under false and fraudulent pretenses. In addition, Armstrong caused the mailing of collection notices on behalf of his company, Legal Recovery Service, which included an addressed return envelope for doctor's offices and which sought payment on behalf of Pinnacle Medical Supply for allegedly unpaid medical supplies. Armstrong deposited some of the payments he received into Parke Bank accounts in the name of Pinnacle Medical Supply and Legal Recovery Service. By using the telephone, email and U.S. Mail, to perpetrate his schemes, I have probable cause to believe that Armstrong has committed both mail and wire fraud, in violation of Title 18, United States Code, Sections 1341 and 1343 (hereinafter the "Specified Federal Offenses").

**ARMSTRONG HAS PREVIOUSLY ENGAGED
IN A SIMILAR FALSE BILLING SCHEME**

5. On September 15, 2015, Armstrong pleaded guilty to one count of mail fraud in conjunction with a similar false invoice scheme that he perpetrated from in or about July 2014 through March 2015. See *United States v. Armstrong*, Crim. No. 14-633 (NLH). Specifically, Armstrong set up a company in the name of Scholastic School Supply, deliberately picking a name similar to Scholastic, a well-known, legitimate company which sells books in schools. Armstrong used a bulk mailer to send tens of thousands of false and fraudulent invoices to schools all over the United States billing \$647.50 for books that the schools had neither

¹ The name of Armstrong's company, Pinnacle Medical Supply, is similar to the name of a legitimate (and unrelated) medical supply company.

ordered nor received. Armstrong directed the bulk mailer to include addressed return envelopes with the invoices which were addressed to various CMRAs where he had rented a box. Pursuant to this scheme, Armstrong unlawfully received hundreds of thousands of dollars.

6. On or about November 13, 2015, the Honorable Noel L. Hillman, U.S. District Court Judge, sentenced Armstrong to 57-months of imprisonment and three years of supervised release. Armstrong was released from federal prison on approximately March 26, 2018 pursuant to the Bureau of Prisons "Home Confinement Program." Armstrong finished serving his sentence on July 27, 2018 and, thereafter, began serving his term of supervised release.

THE INVESTIGATION INTO THE ACTIVITIES OF ARMSTRONG BEGAN WITH COMPLAINTS FROM VARIOUS DOCTOR'S OFFICES AND LAW ENFORCEMENT

Complaint Regarding Pinnacle Medical Supply in Florida

7. On April 11, 2019, Agent Laura Leister from the Brevard County Sheriff's Office received a complaint from Julien Schweitzer, the owner/manager of "The Mail Stop and More," located at 6300 North Wickham Road, #130, Melbourne, Florida regarding possible fraudulent activity. Schweitzer reported that his business received a faxed complaint stating that one of Schweitzer's customers – Pinnacle Medical Supply – was conducting an illegal scam by sending false invoices. Schweitzer identified the complainant and his clinic by name, and that the clinic was located in Auburn, Washington. To protect the identity of the doctor and clinic, they are referred to herein as Auburn, Washington Doctor and Auburn, Washington Clinic.

8. Schweitzer forwarded the complaint, described herein, to Agent Leister, who interviewed pertaining to the complaint and Armstrong. During that interview and

subsequent interviews by me and other law enforcement, Schweizer stated the following:

a. Schweizer received the Auburn, Washington Doctor's complaint via fax.

b. The complaint advised that the Auburn, Washington Clinic received an invoice which they knew to be fraudulent. The invoice was for \$252.00 for diabetic test strips which the Auburn, Washington Clinic never ordered or received. The vendor listed was "Pinnacle Medical Supply," located, according to the invoice, at 6300 North Wickham Road, Ste. 130-388, Melbourne, Florida, 32940. The body of the invoice contained shipping information and provided a tracking number for the shipment. The USPS Tracking number listed was 7018 1130 0000 3930 9063 and displayed a shipment date of February 4, 2019. The order was supposedly delivered to an individual at 9:22 a.m. on February 7, 2019 in Auburn, California.² The Auburn, Washington Doctor included a copy of the invoice, a copy of the provided self-addressed envelope, and a copy of the USPS tracking information, showing a delivery address of Auburn, California, not Auburn, Washington. According to the USPS tracking website, the item delivered was "Certified Mail," not a package.

c. In partnership with the web company, "Anytime Mailbox," The Mail Stop and More serves as a physical location for "Anytime Mailbox" mail deliveries. On or about January 13, 2019, "Anytime Mailbox" received an on-line application from Robert Armstrong, requesting to open a mail box at "The Mail Stop and More," located in Melbourne, Florida. For contact information on the application, Armstrong listed telephone number (800) 735-0460, and

² I confirmed that the tracking number listed on the invoice was not affiliated with any delivery to the Auburn, Washington Clinic.

address in Turnersville, New Jersey 08012.³ After uploading the required documents, Anytime Mailbox reviewed and approved Armstrong's application, and assigned him box #338. After Anytime Mailbox approved Armstrong's application, they supplied "The Mail Stop and More" with the documents associated with Armstrong and bearing his name, including: the "Application for Delivery of Mail through Agent," a State of New Jersey Traveler's Insurance card, a photocopy of a piece of mail from Chase Bank, and a photograph of Robert Armstrong's New Jersey Driver's License . After receiving the approval and supporting documentation, Schweitzer subsequently created a physical box for Armstrong's mail.

d. Shortly after creating box #338, Armstrong contacted "The Mail Stop and More" and instructed Schweitzer to hold his mail each week and forward it every Friday to an address known to be Armstrong's mother's residence in Turnersville, New Jersey. Schweitzer agreed. From January 13, 2019, through March 12, 2019, Armstrong received a nominal amount of mail.

e. On or about March 12, 2019, Armstrong contacted "The Mail Stop and More" and stated he needed to change his box number from "338" to "388," immediately. Schweitzer stated that Armstrong "was in a panic and was not organized" and was informed by Armstrong that he sent out a mailing and did not receive any correspondence in return. Schweitzer believes Armstrong put the wrong box number on the mailings. Schweitzer explained a change in box number had to be approved by Anytime Mailbox and advised Armstrong to contact them. Armstrong ultimately had to complete the application process again

³ From the investigation, I am aware that Armstrong runs his businesses from locations in Gloucester County, New Jersey, including his mother's residence, and also resides in Gloucester County, New Jersey.

through Anytime Mailbox. Armstrong provided the same information and identifying documents as before. Box #338 was then closed and box #388 was opened. After receiving approval from Anytime Mailbox, Schweitzer completed the necessary steps on his end. Almost immediately, mail began arriving for box #388, addressed to "Pinnacle Medical Supply."⁴

f. As instructed, Schweitzer held Armstrong's mail throughout the week and on Fridays forwarded it to Armstrong at an address known to be Armstrong's mother's address in Turnersville, New Jersey. This occurred each week for the time period March 12, 2019 until April 5, 2019. On or about April 15, 2019, Schweitzer gave approximately 347 pieces of unopened mail to Agent Leister who, in turn, provided the mail to U.S Postal Inspectors. Along with additional mail provided by other CMRAs, that mail is the subject of this search warrant.

g. Schweitzer said that he communicated with Armstrong by phone and email. According to Schweitzer, Armstrong utilized XXXXXXXXXXXX@mail.com and XXXXXXXXXX@yahoo.com as the primary method of communication. Schweitzer also stated that Armstrong on occasion contacted him telephonically using the number (XXX) XXX-1723.

9. Agent Leister of the Brevard County Sheriff's Office examined the forms supplied by Armstrong to Schweitzer and noticed a "State of New Jersey Insurance Identification Card," which was used as proof of identification. Upon reading the card, Agent Leister noticed several lines of print that were not uniform with the rest of the document. According to Agent Leister, it appeared that a label had been placed on top of an insurance card and photocopied.

⁴ As described more fully herein, later during the investigation, I learned that on March 7, 2019, a bulk mailing company ("Bulk Mailing Company 1"), mailed approximately 2,989 pieces for Pinnacle Medical Supply using a return envelope with box number "388" instead of "338." I believe that Armstrong mistakenly provided Bulk Mailing Company 1 the wrong box number to put on the return envelopes for that run of the fraudulent invoices for Pinnacle Medical Supply.

Agent Leister then contacted the issuing insurance company, Travelers, located in Paulsboro, New Jersey and spoke with Insurance Agent Rhonda Still. Still confirmed the insurance card was fraudulent, and stated that the insurance policy was in the name of Robert Armstrong's mother. Still specified that Armstrong was not included on the policy and stated that the document bearing his name was "a fraud." Still provided Agent Leister with a copy of the real insurance card that displayed only Robert S. Armstrong's mother's name.

10. Agent Leister did an internet search on Robert S. Armstrong and learned about Armstrong's prior federal conviction for perpetrating the Scholastic School Supply false billing scheme, and contacted the United States Attorney's Office for the District of New Jersey, who, in turn, contacted my Office.

Complaints Regarding Pinnacle Medical Supply and Legal Recovery Service in Texas

11. On or about April 24, 2019, the Houston Division of the United States Postal Inspection Service ("USPIS") received a complaint from a doctor's office in Lexington, Massachusetts regarding a fraudulent collection notice from Legal Recovery Service indicating the original creditor as Pinnacle Medical Supply. The invoice sought payment of \$240.00 for an order of "3,000 Pak (sic) of Sanitizing Skin Wipes" that the doctor indicated were neither ordered nor received. The vendor was a company named Pinnacle Medical Supply located, according to the invoice, at 288 Egg Harbor Road, Suite 9-140, Sewell, New Jersey 08080.

12. As discussed more fully below, 288 Egg Harbor Road, Suite 9-140, Sewell, New Jersey 08080 is a CMRA, not a physical business location. Specifically, the Sewell New Jersey address is also a "PostNet" address and correlates to mailbox number 140.

13. On or about April 24, 2019, the Houston Division of the USPIS received a

complaint from the doctor's office in Boynton Beach, Florida 33435 regarding a collection notice from Legal Recovery Service with a return address of 288 Egg Harbor Road, Suite #9-140, Sewell, New Jersey 08080 indicating the original creditor as Pinnacle Medical Supply on an order which was originally purchased on November 26, 2018 and allegedly received on Monday December 3, 2018. The complainant stated that the doctor's office is closed on Mondays and indicated that they never ordered or received the listed items.

14. On or about April 24, 2019, the Houston Division of the USPIS received a complaint from a second doctor's office in Boynton Beach, Florida regarding a collection notice from Legal Recovery Service with a return address of 288 Egg Harbor Road, Suite #9-140, Sewell, New Jersey 08080 indicating the original creditor as Pinnacle Medical Supply on an order which was allegedly received on Monday, December 3, 2018. According to an employee, the doctor's office is closed on Mondays and never ordered or received the listed items.


15. On or about April 25, 2019, the Houston Division of the USPIS received a complaint from a veterinary clinic in Houston, Texas regarding an invoice from Pinnacle Medical Supply for \$244.00 for an order of "3,000 pack of Sanitizing Hand Wipes" that the clinic indicated were neither ordered nor received. According to an employee of the clinic, the clinic opens at 7:30 a.m. and the purported delivery occurred at 5:20 a.m. as listed on the invoice. The return envelope was addressed to Pinnacle Medical at 1321 Upland Drive Suite #11467, Houston, Texas 77043.

**THE INVOICES RECEIVED BY THE DOCTOR'S OFFICES AND CLINICS
CONTAINED NUMEROUS INDICIA OF FRAUD**

16. On June 5, 2019, I conducted an internal complaint review regarding

Pinnacle Medical Supply and identified more than 160 complaints received by the USPIS from various doctor's offices, clinics and hospitals located throughout the United States relative to the same false billing scheme. I discovered additional complaints filed with the Better Business Bureau and contacted several of those complainants who claimed to have received fraudulent invoices from Pinnacle Medical Supply and/or Legal Recovery Service.

17. I compared the invoices that Armstrong sent out in connection with his prior mail fraud convictions and observed that the present invoices appear very similar in the format and font.

<p>Pinnacle Medical Supply 6300 N. Wickham Rd., Ste. 130-388 Melbourne, FL 32940</p>	<p>Toll Free Phone: 1-800-735-0460 Email: pinnacle-medical-supply@usa.com FEIN: 83-3079671</p>	<p>SCHOLASTIC SCHOOL SUPPLY 1350 E. FLAMINGO RD, STE 820 LAS VEGAS, NV 89119</p>	<p>Toll Free Phone: 866-807-5778 Email: scholasticschoolsupply@usa.com FEIN#:47-1264214</p>
<p>Bill To:</p>	<p>INVOICE March 25, 2019</p>	<p>Bill To:</p>	<p>INVOICE Date: 7/28/14</p>
<p>የዳክሎት ገቢ ለመቀበል የሚያስፈልገውን አድራሻ ይጻፉ። Peplka, James P Do - South Auburn Medical Clinic Attn: Accounts Payable 3830 A St SE Ste 204 Auburn, WA 98002-8604</p>		<p>PACE Charter School of Hamilton Attn: Accounts Payable 1949 Hamilton Avenue Hamilton NJ 8619</p>	<p>School Name: PACE Charter School of Hamilton School Phone: 609.587.2288 School Website: http://www.pacecharterschool.com Tax Exempt Status (Yes/No/Unknown): Purchase Order/School Code #: 8619 Order Process Date: 07/07/14</p>
<p>Purchase Order/Provider ID #: (253) 804-9190 Tax Exempt Status (Yes/No/Unknown): Unknown Invoice #: J2-2489-10 Order Process Date: 2/4/2019</p>	<p>Item Description: Accu-Chek Nano Smartview Glucose Test Strips 50 Count (Pack of 3)</p>	<p>Publication: Everyday Math (Common Core Standards Aligned)</p>	<p>Book Details: -Format: Paperback Workbook -Publication Date: 5/1/13 -Pages: 96 -Weight: 8.8 oz. -ISBN: 978-4217-3250</p>
<p>Enjoy advanced accuracy with ACCU-CHEK®SmartView test strips—as tested against a 23% tighter specification. 1 Easy to handle, quick-fill strip with a bright yellow window makes dosing easy. Small, 0.6-microliter sample size means less blood. Right the First Time Fast 5-second Test Finger tip, palm, and forearm testing * Check with your healthcare provider before testing with blood from sites other than your finger. For testing glucose in whole blood. Made in the USA.</p>	<p>SHIPPING INFORMATION To track this delivery, visit www.usps.com (Track a Package) Tracking #: 7018 1130 0000 3930 9063 This delivery shipped on: 2/4/2019 This delivery was received on: February 7, 2019 at 9:22 am</p>	<p>Quantity Ordered: 50 List Price: \$12.95 Shipping: (Waived For Orders Above \$300.00) Net Price: \$647.50 Amount Due: \$647.50</p>	<p>PLEASE MAKE CHECKS PAYABLE TO: SCHOLASTIC SCHOOL SUPPLY (KINDLY REMIT PAYMENT ON OR BEFORE AUGUST 28, 2014)</p>
<p>Quantity Ordered: 1 List Price: \$244.00 Shipping \$8.00 Net Price: \$252.00 Amount Due: \$252.00</p>	<p>Please make checks payable to: Pinnacle Medical Supply (Kindly remit payment on or before April 20, 2019)</p>	<p>THANK YOU FOR ALLOWING US TO BE OF SERVICE!</p>	<p>(PLEASE DETACH AND MAIL YOUR PAYMENT IN THE ENCLOSED ENVELOPE)</p>
<p>(Please detach and mail your payment in the enclosed envelope)</p>			
<p>Payment From: Peplka, James P Do - South Auburn Medical Clinic Payment Amount: \$252.00 Purchase Order/Provider ID #: (253) 804-9190</p>			

18. In reviewing the Pinnacle Medical Supply invoices received by various complaining doctor's offices and clinics, I also noted indicia of fraud, including the use of a false business address and several misspellings, including an invoice in which "Pack" was misspelled as "Pak." Armstrong also utilizes Toll-Free 800 numbers and includes them on the fraudulent invoices in an attempt to lend an air of legitimacy to the invoices. During the course of the investigation, I called the Toll-Free 800 number listed on the March 25, 2019 Pinnacle Medical Supply invoice above (800-735-0460), and reached an automated voice system requesting me to leave a message. With respect to the use of fraudulent business addresses, Pinnacle Medical Supply listed its address as being 11816 Inwood Road, Suite 1204, Dallas, Texas 75244 and Legal Recovery Service listed its address as being 288 Egg Harbor Road, Suite 9, Private Mail Box 140, Sewell, New Jersey 08080. Neither of these addresses is a physical business location but rather is a CMRA. Specifically, the Dallas, Texas address is for a privately owned CMRA named "PostNet" and correlates to mailbox number 1204, and the Sewell, New Jersey is also "PostNet" address and correlates to mailbox number 140. United States Postal Regulations prohibit businesses from using the word "suite" in their address when they have no physical location attributed to their business. Rather, such businesses are required to use the acronym "PMB" for Personal Mail Box. The purpose of this requirement is to inform the receiver of the mail that the address is a CMRA and not a physical business address. Based upon my knowledge and experience in investigating mail fraud, I know that businesses that are involved in fraudulent activity often use CMRA's and list their business addresses as a "suite" to give the appearance that the business has a physical location when none actually exists in an attempt to lend an air of legitimacy to the business.

19. During the investigation, I obtained copies of documents pertaining to the rental of mailboxes 1204 and 140 in Dallas and Sewell, respectively, and learned that each of those mailboxes had been rented by Robert Armstrong listing his mother's residence in Turnersville, New Jersey as his address. I also obtained copies of the contracts signed by Armstrong from "PostNet," in Sewell, New Jersey and "PostNet" in Dallas, Texas. Those contracts included a warning about the United States Postal Service's prohibition on misrepresenting a CMRA mailbox as a physical business location by using the word "suite."

20. I reviewed Armstrong's application to lease box 1204 and saw that the box had been opened on November 25, 2018 by Robert S. Armstrong and that Armstrong had provided his New Jersey Driver's License, listing his mother's residence as his address, as a means of photo identification to open the box. Armstrong also provided as contact information the phone number of (XXX) XXX-1723, which is known to be a cellular telephone serviced by Sprint and subscribed to Armstrong at his mother's address, and communicated with "PostNet" using the email address of XXXXXXXXXX@yahoo.com. This is the same contact information Armstrong provided to his federal Probation Officer.

21. Similarly, I reviewed Armstrong's application to lease box 140 in Sewell and saw that the box was opened on February 13, 2018 by Robert S. Armstrong, and that Armstrong again provided a copy of his New Jersey Driver's License listing his mother's residence in Turnersville, NJ on the paperwork to open the box. I interviewed the owner of the Sewell CMRA on May 28, 2019. According to the owner, Armstrong paid in cash when he opened the box and listed a telephone number of XXX-XXX-1723, and an email address of XXXXXXXXXXXXXXXXX@hotmail.com. The owner also stated that Armstrong generally picks up

his mail on a daily basis and added that he noticed on one occasion Armstrong wore an “electronic bracelet.” The owner also stated that Armstrong drives an older model green Buick, parks directly in front of the store and retrieves his mail shortly after the Postal Service Letter Carrier delivers the mail.

22. On April 4, 2019, I interviewed an employee of the “PostNet” in Dallas, Texas. The employee stated that Armstrong requested that his mail be forwarded to Armstrong’s mother’s residence. The employee also said he told Armstrong that Armstrong’s box would be closed in 30 days due to the “excessive” amount of complaints being received in relation to the box. According to the employee, the box was “generating a large volume of calls complaining about receiving false billings from Pinnacle Medical Supply.”

23. Additionally, I learned that on or about April 10, 2019, Armstrong opened an additional box at US Global Mail, 1321 Upland Drive #11467, Houston, Texas 77043 as a “forwarding box,” meaning that he opened it with the sole purpose of having the mail from that box forwarded to another address at a prescribed time increment. I interviewed an employee of US Global Mail in Houston on or about June 10, 2019, and the employee stated that Armstrong requested to have all mail received at box# 11467 forwarded directly to his mother’s residence on a weekly basis. The US Global Mail employee also stated they began receiving an excessive amount of complaints shortly after opening the box and immediately closed Armstrong’s box. According to the employee, he then received numerous calls from Armstrong in reference to the box and also received a call from someone claiming to be Armstrong’s attorney threatening to file a lawsuit against US Global Mail. The employee further stated that as of June 10, 2019, mail is still being held for Armstrong by US Global Mail, however, US Global Mail has been

returning to sender mail which visibly appeared to contain checks. The employee also stated that Armstrong listed a Toll-Free telephone number of (800) 735-0460 and listed the type of business as “sales” on the box application. This is the same number listed on the March 25, 2019 Pinnacle Medical Supply invoice sent to the Auburn, Washington Clinic. The US Global Mail employee further stated that Armstrong provided his New Jersey driver’s license and a state of NJ health card as proof of identification when he opened the box.

24. On May 28, 2019, I reviewed the mail at the “PostNet” Sewell, New Jersey location and discovered several mailings from the Office of Attorney General in Kentucky and the Office of Attorney General in Missouri addressed to Legal Recovery Service. I conducted surveillance on May 28, 2019, and observed that at approximately 4:25 p.m., Armstrong retrieved the mail from the Sewell box, entered his green Buick with the mail, and traveled to his residence in Swedesboro, New Jersey.

THE BULK MAILING OF THOUSANDS OF FRAUDULENT INVOICES/SOLICITATIONS

25. On April 25, 2019, I analyzed samples of the fraudulent invoices that had been mailed on behalf of Pinnacle Medical Supply. The U.S. Postage Paid envelopes indicated that the mailings were sent from Bulk Mailing Company 1 in Oklahoma and had been paid by bulk mail permit number XXX. A bulk mailer is a company or individual that prepares mailings for others and receives a discounted postage rate from the United States Postal Service because they mail in bulk quantities. Each bulk mailer has a unique permit number assigned to them for postage billing. I learned that Bulk Mailing Company 1 processed three mailings for Pinnacle Medical Supply on March 11, 2019, March 18, 2019 and April 2, 2019, totaling 10,770 pieces of

First-Class Mail.

26. On June 3, 2019, I spoke with the owner of BULK MAILING COMPANY 1 and she stated that she received via email a one page solicitation/letter from “Randall Brewer” using email address XXXXXXXXXXXXXXXXXXXXXXXXXXXX@usa.com together with a list of doctor’s offices and addresses to which Brewer wanted the solicitations mailed. BULK MAILING COMPANY 1 took the one page solicitation and conducted a mail merge, inserting the name and address of each doctor’s office into the one page form solicitation and then sent out the mailings to the various doctor’s offices in batches. Each mailing sent by Bulk Mailing Company 1 on behalf of Pinnacle Medical Supply and Legal Recovery Services included an envelope – for the doctor’s office payment – preaddressed to Pinnacle Medical Supply at one of Armstrong’s CMRAs, either in Melbourne, Dallas or Sewell. According to the owner of Bulk Mailing Company 1, the three mailings were paid for by Robert Armstrong via bank wires from one of his Parke Bank accounts.

27. On April 1, 2019, the owner of Bulk Mailing Company 1 emailed Pinnacle Medical Supply about discontinuing further mailing services for Pinnacle Medical Supply. She informed me that she discontinued any further business transactions with Pinnacle Medical Supply because she “suspected fraud.” According to the owner whom has been employed in the mailing industry for over 30 years, she suspected fraud due to numerous reasons, including the identical “list price” of the items requested on the invoices. For example, one invoice provided by Bulk Mailing Company 1 showed the list price of an “Epipen” as \$234.00, while another invoice showed the list price of \$234.00 for “Antimicrobial Lotion Soap with Aloe.” The owner also said she found it suspicious that she was communicating through email with “Randall

Brewer,” however, the mailings were paid for by bank transfer in the name of “Robert Armstrong.” She also said that she was suspicious because Pinnacle Medical Supply utilized three different addresses, Sewell, Melbourne, and Dallas. Bulk Mailing Company 1’s owner stated that she never received any response from Pinnacle after she informed them of the discontinuance.

28. I conducted a thorough search of internal USPS and law enforcement databases in an attempt to associate Randall Brewer to Pinnacle Medical Supply, Legal Recovery Service, Asset Recovery Services and Robert Armstrong. The search produced negative results.

29. On May 28, 2019, I received the mailing history of Legal Recovery Services from SouthWest Direct Mailing Services (“SWDMS”). Analysis of the mailing records showed that in August 2018, SWDMS sent via U.S. Mail on behalf of Legal Recovery Services approximately 46,000 copies of a solicitation letter stating Legal Recovery Services would assist in recovery of unclaimed funds for a ten percent fee. I interviewed the Plant Manager of SWDMS and he stated the solicitations were sent to Texas, Alaska, and Nevada. SWDMS provided me with a copy of the check from Parke Bank listing Legal Recovery Service at Armstrong’s mother’s address in Turnersville, New Jersey as the payor for one of the mailings in the amount of \$1,371.59. The Plant Manager stated that he only communicated with Armstrong via the email of XXXXXXXXXX@yahoo.com.

**ARMSTRONG HAS DEPOSITED PROCEEDS FROM HIS FALSE
INVOICE AND COLLECTIONS SCHEMES INTO PARKE BANK ACCOUNTS**

30. As part of the investigation, I sought information regarding the location of the proceeds from Armstrong’s false invoice and collections schemes and learned that Armstrong

has three accounts at Parke Bank: (1) a business account in the name of Pinnacle Medical Supply, account number ending 2801, which Armstrong opened on February 19, 2019; (2) a business account in the name of Legal Recovery Service, account number ending in 8332, which Armstrong opened on February 9, 2018; and (3) a business account in the name of Asset Recovery Service, account number ending in 2395, which Armstrong opened on July 7, 2018.

31. On June 10, 2019, I received bank records from Parke Bank for the aforementioned accounts opened by Robert S. Armstrong. A review of the Parke Bank records for account number ending in 2801 showed that from in or about February 2019 through May 9, 2019, Armstrong deposited approximately 169 checks from various hospitals, clinics, and doctor's offices throughout the United States for a total amount of approximately \$43,248. The vast majority of the checks were in the amounts of \$240 or \$282 – two of the numbers listed on Armstrong's fraudulent Pinnacle Medical Supply invoices.

32. A review of Armstrong's Parke Bank records also showed that Armstrong holds an account with eTrade Financial Corporation, Account Number ending in 1536. Based upon records obtained from Parke Bank, I have probable cause to believe that Armstrong transferred proceeds from his fraudulent scheme in and out of his eTrade account, and used the eTrade account to pay bulk mailer Bulk Mailing Company 1, and other bulk mailing companies to send out invoices in furtherance of his fraudulent scheme.

33. Parke Bank records also showed that Armstrong conducted several transactions a month at multiple USPS retail locations ranging from \$25 to \$250 per transaction and numerous purchases on USPS.com for \$100 per transaction. This is indicative of Armstrong sending out numerous mailings, likely additional fraudulent invoices in furtherance

of his mail fraud schemes.

34. After reviewing Parke Bank records, I contacted several hospitals and doctor's offices about the mailed payments. On June 14, 2019, Victim 1 was interviewed in reference to payments made to Pinnacle Medical Supply. According to Victim 1, Victim 1 received an invoice via U.S. Mail in late February 2019 for \$282 for EpiPens from Pinnacle Medical Supply in Melbourne, Florida. On March 7, 2019, Victim 1 sent check number 109548 via U.S. Mail in the amount of \$282 to Pinnacle Medical Supply in Melbourne, Florida. Victim 1 received an additional ten invoices from Pinnacle Medical Supply for various medical supplies from February 2019 to May 2019. According to Victim 1, these invoices were deemed fraudulent and not paid.

35. On June 12, 2019, I interviewed the Business Office Manager of Victim 2 from Wilmington, Delaware in reference to payments made to Pinnacle Medical Supply. According to the manager, on March 27, 2019, Victim 2 received a \$282 bill from Pinnacle Medical Supply, Melbourne, Florida via U.S. Mail. The bill was addressed to Victim 2 and was purportedly for a prior purchase of epinephrine (EpiPens®) from Pinnacle Medical Supply. The bill was paid by a check sent through U.S. Mail to Pinnacle Medical Supply on March 6, 2019. On May 31, 2019, Victim 2 received an additional bill for "3000 pack of Sanitizing Wipes" from Pinnacle Medical Supply, 99 Wall Street Suite 1840, New York, New York 10005. This bill was in the process of being paid prior to my contact Victim 2. The manager for Victim 2 stated that the EpiPens and wipes were never ordered or received even though payment was sent for the EpiPens.

36. On June 13, 2019, I spoke to the Business Office Manager of Victim 3 in

reference to payments made to Pinnacle Medical Supply. She stated an invoice for EpiPens in the amount of \$282 was received on December 4, 2018 via U.S. Mail. On March 11, 2019, Victim 3 sent check # 23262 via US Mail to Pinnacle Medical Supply in Melbourne, Florida in the amount of \$282. Victim 3 advised receiving an additional invoice via U.S. Mail for “3000 pack of Sanitizing Wipes” in the amount of \$130 on May 27, 2019, from Pinnacle Medical Supply of 99 Wall Street Suite 1840, New York, New York 10005. According to Victim 3, this invoice was not paid.

37. I conducted an internet search for the address 99 Wall Street, New York, New York 10005, and learned that the address is affiliated with, among other businesses and potential residences, a company, PhysicalAddress.com, that offers the use of a Wall Street address without the cost of office space. For example, the website advertised a “NYC Mailing Address for Personal or Business-Access Postal Mail Online, Your New York Mailing Address Could Be: **‘99 Wall Street, Suite 0000, New York, NY.’**” (emphasis in original). I also called the phone number listed on the website and spoke to an employee who confirmed that the business name is PhysicalAddress.com.

38. In conducting this investigation, I have noticed that as certain CMRAs have closed Armstrong’s boxes, he has opened other new boxes to continue to perpetrate his fraudulent schemes. To avoid jeopardizing the existence of this investigation, I have not yet contacted the CMRA at the Wall Street address, which I learned about on or about June 12, 2019, to obtain box application information. I am aware from the above described interview and invoice, however, that Armstrong is using that Wall Street box 1840 in furtherance of his Pinnacle Medical Supply and/or Legal Recovery Service false-billing schemes.

39. I have conducted numerous additional interviews of identified victims that received fraudulent invoices from Pinnacle Medical Supply and/or Legal Recovery Service. Some of the victims reported that they had remitted payment as a result of the fraudulent invoices for EpiPens or Sanitizing wipes which they had neither ordered nor received.