

APR 30 2019

US DISTRICT COURT  
WESTERN DISTRICT OF NC

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NORTH CAROLINA  
CHARLOTTE DIVISION

UNITED STATES OF AMERICA )  
 )  
 v. )  
 )  
 CYNTHIA WILLIAMS-SINGLETON )  
 )  
 \_\_\_\_\_ )

DOCKET NO. 3:19cr127

BILL OF INFORMATION

18 U.S.C. § 1343 (Wire Fraud)

THE UNITED STATES ATTORNEY CHARGES:

**INTRODUCTION**

1. From in or about December 2016 to in or about June 2018, Defendant **CYNTHIA WILLIAMS-SINGLETON** was a customer service representative in Company 1's Charlotte, North Carolina call center working on accounts associated with Client A. **CYNTHIA WILLIAMS-SINGLETON** had access to Company 1's data systems that contained, among other things, retirement fund records for Client A's benefit plan participants and their beneficiaries, including the participants' personally identifiable information.

2. **CYNTHIA WILLIAMS-SINGLETON** engaged in a scheme and artifice to defraud Client A's benefit plan participants and their beneficiaries by fraudulently transferring funds from their accounts to bank accounts under her control. During the course of the scheme, **CYNTHIA WILLIAMS-SINGLETON**'s fraudulently withdrew approximately \$458,772.88 in participant and beneficiary funds from approximately eight participant accounts without authorization. Generally, the holders of the participant accounts victimized by **CYNTHIA WILLIAMS-SINGLETON** were persons over the age of 70.

**SCHEME TO DEFRAUD**

3. It was part of the scheme and artifice to defraud that **CYNTHIA WILLIAMS-SINGLETON** used her access to the personally identifiable information and retirement fund records to make unauthorized changes to beneficiary data and to make unauthorized transfers of funds from Client A's plan participants' retirement accounts into bank accounts in her own name or under her control.

4. It was further part of the scheme to defraud that **CYNTHIA WILLIAMS-SINGLETON** typically accessed a participant's account when the participant contacted the call center. After speaking with the participant and discovering that the participant was unsure or unaware of his or her account balance, **CYNTHIA WILLIAMS-SINGLETON** informed the

participant that the participant's account was either empty, or had less than it did. **CYNTHIA WILLIAMS-SINGLETON** then added herself, her relatives and others, as beneficiaries of that participant's account.

5. It was further part of the scheme to defraud that **CYNTHIA WILLIAMS-SINGLETON** sometimes added her residential address and personal cell phone numbers as contact information on the account.

6. It was further part of the scheme to defraud that **CYNTHIA WILLIAMS-SINGLETON** diverted funds from the participant account to herself and other newly-added beneficiaries.

7. It was further part of the scheme to defraud that **CYNTHIA WILLIAMS-SINGLETON** sometimes called the call center and impersonated relatives of participants. **CYNTHIA WILLIAMS-SINGLETON** then falsely reported the death of the participant in order to initiate the process of disbursement of funds to the beneficiaries that been fraudulently added.

8. It was further part of the scheme to defraud that **CYNTHIA WILLIAMS-SINGLETON** on one occasion called the call center from her personal cell phone while on a break from work to make a death notification.

9. It was further part of the scheme to defraud that **CYNTHIA WILLIAMS-SINGLETON** on one occasion called the call center from her desk phone line and made a death notification.

10. It was further part of the scheme to defraud that **CYNTHIA WILLIAMS-SINGLETON** submitted, or caused to be submitted, to Company 1 false and fraudulent death certificates to initiate beneficiary payments to herself and other fraudulently added beneficiaries, immediate family, and relatives. **CYNTHIA WILLIAMS-SINGLETON** submitted, or caused to be submitted, these false and fraudulent death certificates from a fax machine located close to her desk at Company 1.

11. It was further part of the scheme to defraud that **CYNTHIA WILLIAMS-SINGLETON** fraudulently obtained approximately \$458,772.88 in participant and beneficiary funds.

#### COUNT ONE

12. The United States Attorney realleges and incorporates by reference herein all of the allegations contained in paragraphs one through eleven of the Bill of Information, and further alleges that:

13. From in or about December 2016, through in or about June 2018, in the Western District of North Carolina and elsewhere, the Defendant, **CYNTHIA WILLIAMS-SINGLETON**, with the intent to defraud, did knowingly and intentionally devise the above-described scheme and artifice to defraud and obtain money by materially false and fraudulent pretenses, representations, and promises, and for the purpose of executing such scheme and artifice to defraud, did cause the transmission in interstate commerce, by means of wire communications, certain signals, including among other things, wire transfers of money to and from bank accounts, faxes, and interstate phone calls for the purposes of executing said scheme and artifice.

All in violation of Title 18, United States Code, Section 1343 and 2.

**NOTICE OF FORFEITURE**

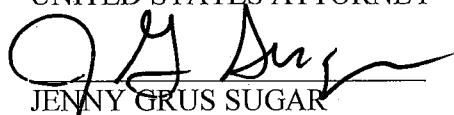
Notice is hereby given of 18 U.S.C. § 982 and 28 U.S.C. § 2461(c). Under Section 2461(c), criminal forfeiture is applicable to any offenses for which forfeiture is authorized by any other statute, including but not limited to 18 U.S.C. § 981 and all specified unlawful activities listed or referenced in 18 U.S.C. § 1956(c)(7), which are incorporated as to proceeds by Section 981(a)(1)(C). The following property is subject to forfeiture in accordance with Section 982 and/or 2461(c):

- a. All property which constitutes or is derived from proceeds of the violations set forth in this bill of information; and
- b. If, as set forth in 21 U.S.C. § 853(p), any property described in (a) cannot be located upon the exercise of due diligence, has been transferred or sold to, or deposited with, a third party, has been placed beyond the jurisdiction of the court, has been substantially diminished in value, or has been commingled with other property which cannot be divided without difficulty, all other property of the defendant/s to the extent of the value of the property described in (a).

The following property is subject to forfeiture on one or more of the grounds stated above:

- a. A forfeiture money judgment in the amount of at least \$458,772.88, such amount constituting the proceeds of the violations set forth in this bill of information.

R. ANDREW MURRAY  
UNITED STATES ATTORNEY



JENNY GRUS SUGAR  
ASSISTANT UNITED STATES ATTORNEY

# NEW CRIMINAL CASE COVER SHEET

# U. S. DISTRICT COURT

(To be used for all new Bills of Indictments and Bills of Information)

CASE SEALED:  YES  NO

DOCKET NUMBER:

If case is to be sealed, a Motion to Seal and proposed Order **must** be attached.)

CASE NAME :US vs

COUNTY OF OFFENSE :

RELATED CASE INFORMATION :

Magistrate Judge Case Number :

Search Warrant Case Number :

Miscellaneous Case Number :

Rule 20b :

SERVICE OF PROCESS :

U.S.C. CITATIONS (Mark offense carrying greatest weight):  Petty  Misdemeanor  Felony

JUVENILE:  Yes  No

ASSISTANT U. S. ATTORNEY :

VICTIM/WITNESS COORDINATORS:

INTERPRETER NEEDED :

LIST LANGUAGE AND/OR DIALECT:

REMARKS AND SPECIAL INSTRUCTIONS: