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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

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UNITED STATES OF AMERICA : Hon. José R. Almonte  
v. : Magistrate. No. 23-16091 (JRA)  
PAMELA VANSYCKLE : **CRIMINAL COMPLAINT**

I, Monica Pilot, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

**SEE ATTACHMENT A**

I further state that I am a Special Agent with the United States Postal Service, Office of the Inspector General, and that this complaint is based on the following facts:

**SEE ATTACHMENT B**

continued on the attached pages and made a part hereof.

  
\_\_\_\_\_  
Monica Pilot, Special Agent  
United States Department of Labor  
Office of the Inspector General

Sworn to and subscribed before me,

October 10, 2023 at  
Date

Newark, New Jersey  
City and State

Honorable José R. Almonte  
United States Magistrate Judge  
Name & Title of Judicial Officer

  
\_\_\_\_\_  
Signature of Judicial Officer

**ATTACHMENT A**

**Count One**

(Federal Employees Compensation Fraud)

From in or about August 2020 through October 2023, in Morris County, in the District of New Jersey, and elsewhere, defendant

PAMELA VANSYCKLE

did knowingly and willfully falsify, conceal, and cover up a material fact, and made false, fictitious, and fraudulent statements and representations, and made a false statement and report knowing the same to contain any false, fictitious, and fraudulent statement and entry in connection with an application for and receipt of compensation and other benefit and payment under Title 5, United States Code, Sections 8102 *et seq.*, which benefits exceeded \$1,000.

In violation of Title 18, United States Code, Sections 1920 and 2.

**Count Two**  
(Making False Statements)

In or about September 2023, in Morris County, in the District of New Jersey, and elsewhere, defendant

PAMELA VANSYCKLE

did knowingly and willfully make a materially false, fictitious, and fraudulent statement and representation in a matter within the jurisdiction of the executive branch of the Government of the United States, to wit, PAMELA VANSYCKLE stated falsely that she did not have employment outside of her federal employment during the time period for which she claimed federal employees' compensation in her application and/or certification to the U.S. Department of Labor for federal compensation for work-related injuries.

In violation of Title 18, United States Code, Sections 1001 and 2.

## **ATTACHMENT B**

I, Monica Pilot, a Special Agent with the United States Postal Service, Office of the Inspector General ("USPS-OIG"), following an investigation and discussions with other law enforcement officers, am aware of the following facts. Because this Criminal Complaint is being submitted for a limited purpose, I have not set forth every fact that I know concerning this investigation; rather, I have only set forth those facts that I believe are sufficient to show that probable cause exists to believe that the defendant has committed the offenses set forth in Attachment A. The contents of documents and the statements and conversations of individuals referenced below are provided in substance and in part, unless otherwise indicated. Where I assert that an event took place on a particular date and time, I am asserting that it took place on or about the date and time alleged. Dollar amounts, and other figures cited herein are approximations.

### **The Regulatory Structure**

1. Based on my participation in this investigation and in prior investigations into federal worker's compensation fraud, and based on my training and experience, I have learned in substance and in part that the Federal Employees' Compensation Act ("FECA"), 5 U.S.C. sections 1807 *et. seq.*, provides compensation to federal employees for injuries sustained during the performance of their workplace duties. An employee may be disabled, and therefore eligible to collect FECA benefits, either due to a sudden, "traumatic injury" or due to a physical or mental condition that develops over time (an "occupational disease").

2. Under FECA, an employee who is totally disabled due to a workplace injury and is married or has one or more dependents is entitled to benefits equivalent to 75% of the employee's federal salary during the period of the disability. An employee is totally disabled if, following the injury, the employee has no capacity to earn wages or work in another position. If an employee with dependents is only partially disabled, the employee's FECA benefits are limited to 75% of the difference between the employee's federal salary and the employee's residual wage-earning capacity. FECA benefits are not subject to federal, state or local income tax.

3. FECA benefits are administered by the Office of Workers' Compensation Programs ("OWCP"), a division of the Department of Labor ("DOL"). To receive FECA benefits, a federal employee who suffers a work-related traumatic injury must first complete, sign and submit to the OWCP a form entitled "Federal Employee's Notice of Traumatic Injury and Claim for Continuation of Pay/Compensation" (a "Form CA-1"). The Form CA-1 requires the employee to describe the nature of the injury for which she is seeking

benefits and the circumstances under which she sustained it. By signing the Form CA-1, the claimant certifies, "under penalty of law," inter alia, that the injury upon which the claim is based "was sustained in the performance of a duty as an employee of the United States Government."

4. Upon the filing of a Form CA-1, the federal employer must continue the disabled employee's regular pay during any periods of disability, up to a combined maximum of 45 calendar days for any single injury. In order to obtain compensation beyond this 45-day period, the employee must file a "Claim for Compensation Due to Traumatic Injury or Occupational Disease" (or "Form CA-7"). The Form CA-7 does not permit the claimant to request benefits for prospective periods of disability. Thus, in order to receive benefits on a schedule that replicates her normal pay cycle, the claimant must generally file a new form CA-7 every two weeks.

5. Section 3 of the Form CA-7 requires the complainant to "report any and all earnings from employment (outside your federal job)" for the period(s) for which benefits are claimed. The claimant is specifically directed to disclose "all earnings from employment . . . ; including any employment for which [she] received a salary, wages, income, sales commissions, or payment of any kind," as well as "self-employment, odd jobs, involvement in business enterprises, [and] service with the military." Section 3 also cautions that "[f]raudulently concealing employment or failing to report income may result in forfeiture of compensation benefits and/or criminal prosecution."

6. A claimant who has been receiving FECA benefits for a sustained period of time and is unlikely to return to work in the near future is placed on the "Periodic Roll." A claimant included on the Periodic Roll receives disability compensation automatically every 30 days and is not required to file Form CA-7 on a bi-monthly basis. Instead, each year, the claimant must complete, sign and file a questionnaire known as Form CA-1032.

7. Form CA-1032 requires the claimant to disclose all employment activities in which the claimant has participated in the 15 months prior to completing the form. The claimant is specifically informed that "[i]f you performed any duties in any business enterprise for which you were not paid, you must show as rate of pay what it would have cost the employer or organization to hire someone to perform the work or duties you did even if your work was for yourself or a family member or relative." The final portion of the form requires the claimant to acknowledge that false or incomplete reporting can give rise to criminal prosecution and forfeiture of benefits.

### The Defendant and Submission of Claims

8. Defendant, PAMELA VANSYCKLE (“VANSYCKLE”) was hired by the United States Postal Service (“USPS”) as a rural carrier in Lake Hopatcong, New Jersey, on or about January 3, 1989.

9. On or about September 1, 2020, VANSYCKLE completed, signed and filed with OWCP a Form CA-1. On that document, VANSYCKLE stated that on August 3, 2020, she sustained a work-related injury, specifically, that she suffered a right-ankle injury while delivering “3 very large packages” to a home and “rolled [her] right ankle as [she] turned to go back to the truck.” She claimed that as a result of the incident, she suffered “a severe sprain.”

10. Between in or around September 2020 and in or around March 2021, VANSYCKLE completed, signed and filed more than ten Forms CA-7 with OWCP. Section 3 of each of the CA-7 forms contained the following instruction:

You must report any and all earnings from employment (outside your federal job); include any employment for which you received a salary, wages, income, sales commissions, or payment of any kind during the period(s) claimed in section 2. Include self-employment, odd jobs, involvement in business enterprises, as well as service with the military. Fraudulently concealing employment or failing to report income may result in forfeiture of compensation benefits and/or criminal prosecution. ***Have you worked outside your federal job for the period(s) claimed in Section 2?*** (emphasis in the original)

In response to this question on each of the submitted forms, VANSYCKLE checked off “No”.

11. In or around October 2021, DOL placed VANSYCKLE on the Periodic Rolls (“PR”), meaning that she began receiving FECA benefits automatically every 30 days. To continue receiving benefits, VANSYCKLE was not required to file Form CA-7 on a bi-monthly basis. Instead, VANSYCKLE was required to complete and file an annual Form CA-1032 certifying, in each instance, that she had not worked or had outside employment for the preceding 15 months.

12. Between in or around October 2021 and in or around September 2023, VANSYCKLE completed, signed and filed three Forms CA-1032. In the “Part A – Employment” section of each of these forms, VANSYCKLE was instructed to:

**Report ALL self-employment or involvement in business enterprises.** These include but are not limited to: . . . sales work; operating a business; . . . any online work/business; and providing services in exchange for money, goods, or other services. . . . Report activities such as keeping books and records, or managing and/or overseeing a business of any kind, including a family business. (emphasis in the original)

Later in the same section, the applicant was required to:

**Report ANY work or ownership interest in any business enterprise,** even if the business lost money or if profits or income were reinvested or paid to others. If you performed any duties in any business enterprise for which you were not paid, you must show as “rate of pay” what it would have cost the employer or organization to hire someone to perform the work or duties you did, even if your work was for yourself or a family member or relative. (emphasis in the original)

Again, later in the same section of the CA-1032 forms, the applicant was provided with the following admonition followed by a series of questions:

**CRIMINAL, CIVIL AND ADMINISTRATIVE PENALTIES MAY BE APPLIED FOR FAILURE TO REPORT ALL WORK ACTIVITIES THOROUGHLY AND COMPLETELY** (emphasis in the original)

“2. Were you self-employed or involved in any business enterprise in the last 15 months?”

13. On or about October 15, 2021, VANSYCKLE submitted her initial Form CA-1032 form and wrote in “Yes” in response to question 2. When asked to provide further information regarding the dates of self-employment or involvement in the business enterprise, VANSYCKLE wrote:

“Own a business but have not been able to work with it. My husband handles everything”

14. On or about September 14, 2022, VANSYCKLE submitted her second Form CA-1032 form and wrote in “No” in response to question 2. VANSYCKLE then wrote:

“I own a business with my husband that he has been running. I collect no pay from this business”

15. On or about September 7, 2023, VANSYCKLE submitted her third Form CA-1032 form and again wrote in “No” in response to question 2. VANSYCKLE then wrote:

“I own a business with my husband & he has been running it. I collect no pay from this business”

16. To date, VANSYCKLE received approximately \$155,199.35 in disability benefits from the OWCP.

**VANSYCKLE’S Involvement in the Business Enterprise - Kingdom Konsultant**

17. VANSYCKLE is the owner and founder of Kingdom Konsultant (“KK”), a travel agency that she formed in 2004. VANSYCKLE operates KK primarily out of her home and through a KK webpage that advertises the services of KK.

18. Information obtained from open-source materials, bank records, surveillance and communications between VANSYCKLE and an undercover officer show that in addition to her ownership interested in KK, VANSYCKLE is extensively involved in running the KK business enterprise. The information obtained over the course of the investigation has also revealed that VANSYCKLE has been involved with running KK during the period of time she has claimed to be totally disabled and has collected FECA benefits.

*VANSYCKLE’s Work as a Sales Agent for KK*

19. When the KK webpage was accessed in or around September 2023, a review of the “Our Agents” link showed the photographs and specialty services provided by 27 travel agents including VANSYCKLE. Thus, in addition to being the owner of KK, VANSYCKLE provides services to her customers akin to a travel agent as set forth in her biographical disclosures on the website. VANSYCKLE’s photo and list of specialized services was included among the listed agents as set forth below:



**Specializing in:**

Walt Disney World Resort  
Disney Cruise Line  
Disneyland Resort  
Adventures by Disney  
Universal Orlando Resort  
Royal Caribbean Cruise Line  
Norwegian Cruise Line  
Aulani, A Disney Resort & Spa  
Hawaii Vacation Specialist  
Luxury Travel Specialist  
Traveling with Disabilities Specialist

20. When clicking on the hyperlink to “Read More About Pam,” the following description appeared:

**I'm Pam. I'm the owner of Kingdom Konsultant Travel. I specialize in all aspects of Disney travel including *Walt Disney World*® Resort, *Disneyland*® Park, *Disney Cruise Line*® and *Adventures By Disney*®. I also specialize in Grand Gatherings and Honeymoons at *Walt Disney World*® Resort. I am a Graduate of the College of Disney Knowledge and I have attended numerous on site education programs. I also attend the Earmarked conferences so that I can learn what Disney has in store for my clients in the coming year(s). I am also certified on many of the different Cruise Lines, Universal Studios, Hawaii and Mexico. I live in New Jersey but spent time living in Germany and have been to Switzerland. My love of Disney goes back almost 30 years and it's just as strong today. There is nothing that I love doing more than helping a couple, a family, school children, college kids or a multigenerational family have a wonderful time on their vacation. Whether it's their first Disney vacation or their 10th, they will get the same attention to detail with every trip. I love what I do and it shows!**

21. In a social media posting on or about October 7, 2022, the caption above a photograph read, “KK agents are attending training at Universal Orlando!!” VANSYCKLE appears in the photograph with several other KK travel agents.

22. In a social media posting on or about January 13, 2023, KK posed a series of questions about travel to Alaska. If consumers needed any additional details, they were directed to reach out to their “favorite KK travel advisor.” When one consumer commented with a question asking whether, “Any adjustments to existing reservations” were possible, VANSYCKLE responded, “[Consumer] we can definitely check! Pop me an email and I'll look this afternoon”

23. More recently, on or about July 15, 2023 and in four subsequent postings, KK posted a flyer promoting VANSYCKLE's ongoing work as a sales agent as captured below:



Kingdom Konsultant Travel

July 15 · 🌐

We are celebrating agency owner Pam's 25th year of selling Disney destinations!

IT'S MY 25TH YEAR OF SELLING DISNEY DESTINATIONS!

**JOIN THE CELEBRATION**

**\$25 Disney gift card**

Purchase four (4) or more special event tickets\* or three (3) days or more stand alone park tickets to qualify.

**SPECIAL TICKET OFFER**

Contact your favorite Kingdom Konsultant travel agent today!!  
[www.kingdomkonsultant.com](http://www.kingdomkonsultant.com)

Pamela Van Syckle  
Agency Owner

\*Jollywood Nights, Mickey's Not So Scary or Mickey's Very Merry tickets.

OFFER ENDS SEPTEMBER 25, 2023.  
GIFT CARD CAN NOT BE EXCHANGED FOR CASH. NEW TICKET PURCHASES ONLY.

Kingdom Konsultant Travel

You Dream It, We Book It! Authorized Disney Vacation Planners helping you m...

Call now

*VANSYCKLE Offers Services as a Sales Agent to an Undercover Officer Posing as a Customer*

24. In or around March 2023, an undercover (the “UC”) officer, posing as a potential customer interested in booking an anniversary trip, sent an email to [pam@kingdomkonsultant.com](mailto:pam@kingdomkonsultant.com), the email address for VANSYCKLE listed on the KK webpage. Approximately three hours after sending the message, the UC received a response from [pam@kingdomkonsultant.com](mailto:pam@kingdomkonsultant.com).

25. The response noted that “We have booked numerous anniversary trips over the years” and that she and her husband “run the agency and we tag team clients.” The UC was then asked a series of questions regarding the UC’s travel plans and anticipated travel dates. The response was electronically signed as “Pam & Scott” directly above that salutation of “Pamela VanSyckle.”

26. The following day, the UC answered the questions he received from [pam@kingdomkonsultants.com](mailto:pam@kingdomkonsultants.com) and responded with a few additional questions. Approximately 2 hours later, the UC received a response from “Scott (Pam’s husband)” who noted that he answered all of the UC’s questions because Pam was “out of the office until later [that] afternoon.” This response to the UC also suggested that the UC set up a “My [Corporation-1] Experience Account” and that “Pam [could] show [the UC] more during setup.”

27. Two days later, the UC received a list of potential hotels and prices from pam@kingdomkonsultants.com and signed electronically by “Pam and Scott.”

28. On or about March 31, 2023, the UC received information about potential transportation companies from pam@kingdomkonsultant.com and signed electronically by “Pam and Scott.”

VANSYCKLE's Marketing of Products Offered by KK

29. In a social media posting on or about July 10, 2022, two videos were posted promoting a Corporation-1 Cruise Ship. VANSYCKLE narrated two videos as she walked around the ship with a hand-held camera. In the first video, VANSYCKLE is seen in the mirror of a restaurant walking without the aid of any mobility assistance device. The second video on that date was again narrated by VANSYCKLE as she walked around the ship with a hand-held camera.

30. In a social media posting on or about August 27, 2022, VANSYCKLE narrated another video as she walked around a hotel operated by Corporation-1. In this video, again narrated by VANSYCKLE, she walked around the hotel for approximately 9 minutes and 10 seconds.

31. In another social media posting on or about December 9, 2022, VANSYCKLE narrated another video showing features offered by Corporation-2 on their cruise ship. In that video, VANSYCKLE identified herself at the start saying, “This is Pam with KK Travel and welcome to Corporation-2's Wonder of the Seas.” The video on that date, again narrated by VANSYCKLE as she walked around the ship with a hand-held camera.

VANSYCKLE's Involvement in the Operations of KK

32. As set forth above, between in or around September 2020 and in or around March 2021, VANSYCKLE signed and filed in excess of ten Forms CA-7. On all of the CA-7 forms submitted by VANSYCKLE, she checked off “No” when asked to certify whether she had worked outside her federal employment during the period in which she sought FECA benefits. During that time period, however, the signature of PAMELA VANSYCKLE appeared on at least 57 checks issued by KK.

33. Approximately one month after signing the initial CA-1 claim form, VANSYCKLE, in her capacity as owner of KK, corresponded by email with the

corporate offices of Corporation-1, the company with whom she booked the majority of KKs travel, seeking to obtain merchandise.

34. On or about October 15, 2021, VANSYCKLE completed and filed an annual Form CA-1032. On this Form CA-1032, VANSYCKLE responded, “No” to the question of whether she did “work for any employer during the past 15 months.” During the relevant 15-month time period preceding the submission of this initial Form CA-1032, however, the signature of PAMELA VANSYCKLE appeared on at least 145 checks issued by KK. Of those 145 checks issued with the signature of PAMELA VANSYCKLE during this time period, approximately 77 were issued to travel agents listed on the KK webpage.

35. On or about September 14, 2022, VANSYCKLE completed and filed a second annual Form CA-1032 in order to continue receiving benefits on the PR. On this Form CA-1032, VANSYCKLE again responded, “No” when asked whether she did “work for any employer during the past 15 months.” During the relevant 15-month time period preceding the submission of this second Form CA-1032, however, the signature of PAMELA VANSYCKLE appeared on at least 87 checks issued by KK. Of those 87 checks issued with the signature of PAMELA VANSYCKLE during this time period, approximately 28 were issued to travel agents listed on the KK webpage.<sup>1</sup>

36. On or about September 7, 2023, VANSYCKLE completed and filed a third annual Form CA-1032 in order to continue receiving benefits on the PR. On this Form CA-1032, VANSYCKLE again responded, “No” when asked whether she did “work for any employer during the past 15 months.” In fact, during the relevant 15-month time period preceding the submission of this second Form CA-1032, VANSYCKLE engaged in sales and marketing activities on behalf of the business enterprise KK.

37. In addition to performing sales and marketing activities, VANSYCKLE engaged in various operational activities on behalf of KK during the relevant time period. On or about December 3, 2022, KK posted the following announcement on a social media site:

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<sup>1</sup> In or around the summer of 2021, several KK travel agents listed on the webpage received disbursements from KK via Zelle rather than checks.



Hang onto your hats!!! The Kingdom Konsultant team will be doing double duty next week as we'll be at Walt Disney World AND Disneyland. Co-owner/founder Pam will be at WDW & co-owner Scott will be at Disneyland, as part of the EarMarked Owners Summit.

**Law Enforcement Surveillance of VANSYCKLE**

38. VANSYCKLE has not reported to work for the USPS since on or about August 3, 2020, the date she reported having sustained a work-related injury to her ankle.

39. From on or about December 4, 2022 to on or about December 8, 2022, Special Agents (the "SAs") working in a plain-clothes detail conducted surveillance of VANSYCKLE in Orlando, Florida during the aforementioned EarMarked Owners Summit.

a. On December 5, 2022 at approximately 11:46 a.m., SAs observed VANSYCKLE enter the Magic Kingdom. One of the SAs followed VANSYCKLE as she walked through the park without the aid of any mobility assistance device. Over the course of approximately 2 hours and 41 minutes, VANSYCKLE walked approximately 2.28 miles.

c. On December 6, 2022, between approximately 11:56 a.m. and 4:00 p.m., SAs observed VANSYCKLE shopping at the Florida Mall, at a furniture store and at a wholesale box store without the aid of any mobility assistance device.

d. On December 7, 2022, between approximately 6:30 p.m. and 8:18 p.m., SAs observed VANSYCKLE shopping at Disney Springs without the aid of any mobility assistance device. She was observed purchasing items and carrying them in bags while continuing to walk through Disney Springs without any assistance.

e. On December 8, 2022, between approximately 10:40 a.m. and 5:27 p.m., SAs observed VANSYCKLE walking around her hotel, walking through Universal Studios theme park and going on rides without the aid of any mobility assistance device.