

UNITED STATES DISTRICT COURT
DISTRICT OF RHODE ISLAND

UNITED STATES OF AMERICA

v.

SARAH J. CAVANAUGH,
Defendant

Criminal Case No. 1:22CR79JJM-LDA

Violations:

18 U.S.C. § 1343
(Wire Fraud)

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

18 U.S.C. § 498
(Forged Military Discharge Certificate)

18 U.S.C. § 704(b)
(Fraudulent Use of Military Medals)

INFORMATION

The United States Attorney charges that:

COUNT 1
(Wire Fraud)

Introduction

At all times relevant to this Information, unless herein stated:

1. SARAH J. CAVANAUGH (“CAVANAUGH”) was a resident of the District of Rhode Island.
2. CAVANAUGH, since 2016, was a licensed social worker (“LSW”) in the State of Rhode Island and was an employee of the Department of Veterans Affairs (“VA”) at the Providence, R.I. Veterans Affairs Medical Center (“VAMC”).

CAVANAUGH has not, at any time, served in the armed forces of the United States.

3. Members of the military leaving active duty are issued a Defense Department Form 214 ("DD214") - a military Certificate of Release or Discharge from Active Duty - upon discharge. The DD214 lists, among other things: the service member's date and place of entry into and release from active duty; last duty assignment and rank; military job specialty; military education; and any decorations, medals, badges, citations, and campaign awards received. The DD214 also contains an Electronic Data Interchange Personal Identifier ("EDIPI") number, commonly referred to as a Department of Defense Identification number, a completely unique number used to identify specific individuals who are affiliated with the Department of Defense.

4. The Purple Heart is a military decoration given to servicemembers who suffer wounds from enemy action. The Bronze Star with a Combat "V" is a military decoration awarded for meritorious or heroic acts performed during actual combat.

5. As an LSW for VAMC, CAVANAUGH had significant interaction with veterans which involved, among other things, gathering documents proving military service from patients, including DD214 forms, and directing veterans to resources within the community to fulfill immediate needs. By virtue of her employment, through use of the VAMC's computer network, CAVANAUGH had access to veterans' military service and medical records and became familiar with veteran-focused charities.

The Victim Servicemembers

6. "P.H." is a Rhode Island resident who served in the United States Marine Corps ("USMC") from 2011 to 2016. EDIPI number XXXXXX0253 was issued to P.H.

7. "J.H." is a Rhode Island resident who served in the United States Navy from 1997 to 2017. J.H. was a patient at the R.I. VAMC who was being treated for cancer.

The Victim Veterans Charities

8. HunterSeven is an organization that conducts research on military veteran-specific issues and occasionally provides monetary aid to veterans in need of assistance.

9. Wounded Warrior Project is a veterans' service organization for post-9/11 wounded veterans that offers longer-term support for wounded veterans in various ways, including compensation, education, health care, insurance, housing and employment.

10. The Veterans of Foreign Wars of the United States ("VFW") is a veterans' service organization comprised of eligible veterans and military service members from the active, guard, and reserve forces. Membership in the VFW is limited to those military veterans who meet certain criteria, including service overseas. VFW Post 152 is headquartered in North Kingstown, R.I.

11. CreatiVets is an organization that helps wounded veterans struggling with post-traumatic stress and brain injury by using music and art to help heal their unseen wounds of wars and to develop mechanisms to cope with stress, depression, and other side-effects of war.

12. Code of Support is a Virginia-based organization that acts as a clearinghouse for veterans in need, linking eligible veterans to third-party organizations that can best fulfill their needs.

13. SSG Matthew A. Pucino Memorial Foundation is a Massachusetts-based foundation that serves to honor the memory of its namesake by providing for the physical and emotional needs of combat wounded soldiers and their families, helping with travel, rehabilitation, PTSD, traumatic brain injuries and depression, and also offering unconventional resources to facilitate the special needs of wounded, ill, and injured veterans.

14. Air Warrior Courage Foundation is an organization that, among other things, assists disabled and/or needy war veterans and members of the U.S. Armed Services and their dependents, and widows and orphans of deceased veterans.

15. VetLinks is an organization that provides personalized, tailored support to individual combat veterans and caregivers suffering from the effects of post-traumatic stress and traumatic brain injury by offering mental health care, therapy, counseling, legal assistance, education, and administrative assistance.

16. The Clemente Institute Veterans Initiative is a program that provides free college-like classes for veterans to explore military service and combat through history and art.

17. Patrol Base Abbate is an organization that sends eligible military veterans on wilderness retreats for relaxation and as a form of therapy.

The Victim Employee Benefit Programs

18. Emergency Paid Leave is a program funded by the federal Office of Personnel Management available to federal employees, including employees of R.I. VAMC, that provided paid leave to federal employees who were at elevated risk of serious illness from COVID-19. The leave applied to individuals who were unable to work at all, including those teleworking, due to COVID-19.

19. Under the VA's Voluntary Leave Transfer Program, employees can donate annual leave directly to another employee who has a personal or family medical emergency and who has exhausted his or her available paid leave. There is no limit on the amount of donated annual leave a leave recipient may receive from the leave donor(s). In order to obtain donated leave, the recipient is required to apply, stating, among other things, the reasons transferred leave is needed, including a brief description of the nature, severity, and anticipated duration of the medical emergency. Individual agencies may require certification regarding the medical emergency from one or more physicians or other appropriate experts.

Other Victims

20. "M.A." is a Rhode Island resident who became acquainted with CAVANAUGH through Training for Warriors West Bay, a now-closed exercise facility once located at 1950 South County Trail, East Greenwich, R.I. 02818.

21. "A.O." is a Rhode Island resident who was undergoing cancer treatment at Dana-Farber Cancer Institute in Boston, Massachusetts.

22. "S.F.," the daughter of A.O., is a physical therapist known to CAVANAUGH and the owner of physical therapy practice located in East Greenwich, R.I.

23. GoFundMe is a for-profit crowdfunding platform that allows people to raise money for events ranging from life events such as celebrations and graduations to challenging circumstances like accidents and illnesses.

Scheme and Artifice to Defraud

24. From in or about January 1, 2015, and continuing until in or about March 31, 2022, in the District of Rhode Island and elsewhere, defendant SARAH CAVANAUGH knowingly devised and intended to devise a scheme and artifice to defraud, and for obtaining money and property by materially false and fraudulent pretenses, representations, and promises.

Object of the Scheme to Defraud

25. The object of the scheme to defraud was for SARAH CAVANAUGH to obtain money and property, which exceeded \$250,000.00, from individuals, charities, and employee benefit programs by fraudulently holding herself out as a USMC veteran and Purple Heart and Bronze Star recipient suffering from cancer and other combat-related injuries in need of financial assistance and other services due to her service-related injuries or illnesses.

Manner and Means of the Scheme to Defraud

26. It was part of the scheme to defraud that CAVANAUGH falsely represented herself to others as being a combat veteran of the USMC when in fact she had never served in the military.

27. It was also part of the scheme to defraud that CAVANAUGH falsely represented herself to others as being the recipient of the Purple Heart and Bronze Star with a Combat "V."

28. It was also part of the scheme to defraud that CAVANAUGH altered and forged the DD214 of P.H. without his knowledge or consent, which contained P.H.'s actual EDIPI (XXXXXX0253), and - claiming it to be her own - fraudulently submitted it to veterans' organizations and charities as proof of her military service and awards.

29. It was also part of the scheme to defraud that CAVANAUGH borrowed the USMC uniform of an acquaintance and wore the uniform, replete with the aforementioned medals, in public and to military events.

30. It was also part of the scheme to defraud that CAVANAUGH falsely claimed, as a result of her USMC military service, to have developed lung cancer - and sustained other physical injuries - from exposure to burn pits in Iraq/ Afghanistan and from inhaling particulate matter in the aftermath of an Improvised Explosive Device attack, when in fact she did not have lung cancer or any other physical injuries related to military service and had not, in fact, served in the military.

31. It was also part of the scheme to defraud that CAVANAUGH used the altered and forged cancer-related medical bills and diagnoses of actual cancer patients

without their knowledge or consent to fraudulently represent to individuals, charities, and employee benefit programs that she had cancer and was undergoing cancer treatments.

32. It was also part of the scheme to defraud that CAVANAUGH falsely represented herself to individuals, charities, and employee benefit programs as a decorated USMC veteran suffering from cancer and other combat-related injuries who needed financial assistance and other services in order to fraudulently induce those individuals, charities, and employee benefit programs to furnish her with, among other things, money, gift cards, home repairs, gym memberships, travel and vacations, educational courses, and compensated sick leave.

Acts in Furtherance of the Scheme to Defraud

In furtherance of the scheme to defraud and to advance its object, CAVANAUGH committed the following acts, among others:

33. In or about April 2016, CAVANAUGH submitted an altered and forged DD214 to Wounded Warrior Project (“WWP”), falsely claiming to be a cancer-stricken USMC veteran who was wounded in action in Iraq, inducing WWP to expend at least \$225,895.00 on CAVANAUGH.

34. On or about November 11, 2016, CAVANAUGH applied to become a member of the Veterans of Foreign Wars (“VFW”) Post 152, headquartered in North Kingstown, R.I., providing a fraudulent DD214 in support of her application.

35. Between 2016 and 2021, VFW Post 152 entrusted CAVANAUGH with \$4,395.60, intended as donations from VFW Post 152 to the "Giving Tree" charity through the Providence, R.I. VAMC, which was never received by the R.I. VAMC.

36. In or about 2017, CAVANAUGH, falsely representing herself to be an injured or ill combat veteran, induced M.A., a gym member at Training for Warriors West Bay, to give CAVANAUGH \$2,500 to use toward medical expenses.

37. In or about 2018, CAVANAUGH applied to the CreatiVets program for benefits, providing a fraudulent DD214 as part of her application which noted that she was the recipient of the Purple Heart and Bronze Star with a Combat "V," inducing CreatiVets to spend approximately \$14,972 on art-program tuition and travel for her.

38. On or about February 25, 2019 and January 11, 2021, CAVANAUGH provided a fraudulent DD214 to Code of Support ("COS") to obtain financial aid or services from COS or affiliated third-party organizations, thereby inducing SSG Matthew A. Pucino Memorial Foundation to pay \$10,072 for a new furnace for CAVANAUGH's home; Air Warrior Courage Foundation to donate \$2,500 to CAVANAUGH; VetLinks to donate \$3,600 to CAVANAUGH; and Easter Seals to pay CAVANAUGH's \$900 gym membership at "Training for Warriors West Bay."

39. On or about December 6, 2019, CAVANAUGH, falsely representing herself to be a decorated USMC combat veteran, applied for, and was accepted by, the Clemente Institute Veterans Initiative program, receiving course instruction and travel to New York City museums.

40. In or about March 2020, CAVANAUGH falsely represented herself to J.H. as a fellow cancer patient struggling to pay the insurance deductibles for her cancer treatments at Dana-Farber Cancer Institute, fraudulently inducing J.H. to give her \$594 per month for nine months to pay her insurance deductibles, totaling approximately \$5,346.

41. From in or about May 2020 to in or about March 2021, CAVANAUGH misused the Voluntary Leave Transfer Program through which she received donated leave from other federal employees based upon her false representations that she was ill with cancer, fraudulently obtaining 261 hours of leave worth \$11,891.16.

42. In or about February 2020 and November 2021, CAVANAUGH fraudulently obtained Emergency Paid Leave ("EPL") by submitting false Department of Labor paperwork to the VA requesting special leave consideration. CAVANAUGH, without authorization, signed the false paperwork with the name of S.F., a physical therapist known to CAVANAUGH. As a result, CAVANAUGH fraudulently obtained 460 hours EPL valued at approximately \$20,957.60.

43. In or about July 2021, CAVANAUGH applied electronically to Patrol Base Abbate to participate in their veterans' wilderness retreats and was selected to go on retreats to Montana and Colorado in 2021 based upon her false claims of military service and combat injuries, causing a loss to Patrol Base Abbate of approximately \$1,912.39.

44. On or about September 24, 2021, CAVANAUGH sent an email to a San Diego business, Regatta Men's Wear, which specializes in military ribbons and medals, to purchase, among other awards, a Bronze Star with a Combat "V" and a Purple Heart.

45. In or about November 2021, CAVANAUGH created a fundraiser on the social media site "GoFundMe," entitled "Help Sarah Win Her Battle," which falsely described her as a combat veteran suffering from cancer. Donors from around the United States gave money to the campaign totaling \$4,766, which was transferred to CAVANAUGH's bank account.

46. On or about January 17, 2022, CAVANAUGH submitted to HunterSeven altered medical bills belonging to A.O. and a cancer diagnosis belonging to J.H., falsely claiming them to be her own, when attempting to obtain money from HunterSeven to help pay her medical bills for alleged military-service-related medical issues.

Execution of the Scheme to Defraud

47. On or about January 12, 2021, for the purpose of executing the aforementioned scheme and artifice, and attempting to do so, defendant SARAH CAVANAUGH did knowingly transmit and cause to be transmitted from Rhode Island to Virginia by means of wire communication, writings, signs, and signals, to wit, an email to Code of Support containing an image of an altered and forged military discharge form DD214 falsely representing herself as a USMC veteran and Purple Heart and Bronze Star recipient,

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

COUNT 2
(Aggravated Identity Theft)

48. The allegations contained in paragraphs 1 through 47 of this Information are re-alleged in this Count and are incorporated by reference as if fully set forth herein.

49. Between on or about January 1, 2015 to on or about March 31, 2022, the exact days or dates unknown, in the District of Rhode Island and elsewhere, the defendant, SARAH CAVANAUGH, during and in relation to the felony offense of wire fraud (18 U.S.C. § 1343), did knowingly transfer, possess and use, without lawful authority, a means of identification of another person, to wit: the signature, initials, and Electronic Data Interchange Personal Identifier number (XXXXXX0253) of P.H. on form DD214 that was sent to various charities and organizations in order to obtain money or property from those entities,

In violation of Title 18, United States Code, Section 1028A.

COUNT 3
(Forged Military Discharge Certificate)

50. The allegations contained in paragraphs 1 through 47 of this Information are re-alleged in this Count and are incorporated by reference as if fully set forth herein.

51. Between on or about January 1, 2015, to on or about March 31, 2022, the exact day or dates unknown, in the District of Rhode Island and elsewhere, the defendant, SARAH CAVANAUGH, did forge, counterfeit, and falsely alter a certificate of discharge from the United States Marine Corps, namely, the form DD214 belonging

to P.H., and use, unlawfully possess and exhibit such certificate, knowing the same to be forged, counterfeited, and falsely altered,

In violation of Title 18, United States Code, Section 498.

COUNT 4
(Fraudulent Use of Military Medals)

52. The allegations contained in paragraphs 1 through 47 of this Information are re-alleged in this Count and are incorporated by reference as if fully set forth herein.

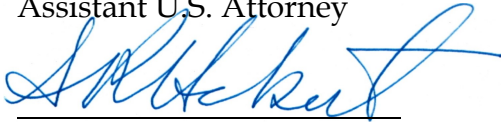
53. Between on or about January 1, 2015, to on or about March 31, 2022, the exact day or dates unknown, in the District of Rhode Island and elsewhere, the defendant, SARAH CAVANAUGH, with intent to obtain money, property, and other tangible benefit, did fraudulently hold herself out to be the recipient of the Purple Heart and the Bronze Star with a Combat "V,"

In violation of Title 18, United States Code, Sections 704(b) and (d)(1).

ZACHARY A. CUNHA
United States Attorney



RONALD R. GENDRON
Assistant U.S. Attorney



SANDRA R. HEBERT
Criminal Division Chief

Date: July 11, 2022

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT

BY: INFORMATION INDICTMENT COMPLAINT

CASE NO. 1:22CR79JJM-LDA

Matter Sealed: Juvenile Other than Juvenile
 Pre-Indictment Plea Superseding Defendant Added
 Indictment Charges/Counts Added
 Information

USA vs.

Defendant: SARAH JANE CAVANAUGH

Address: 

Name of District Court, and/or Judge/Magistrate Location (City)
 UNITED STATES DISTRICT COURT RHODE ISLAND
 DISTRICT OF RHODE ISLAND Divisional Office

Name and Office of Person ZACHARY A. CUNHA
 Furnishing Information on U.S. Atty Other U.S. Agency
 THIS FORM Phone No. (401) 709-5000
 Name of Asst. Ronald R. Gendron
 U.S. Attorney
 (if assigned)

Interpreter Required Dialect: _____

Birth Date  Male Alien
 Female (if applicable)

Social Security Number _____

PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)
VA/Office of the Inspector General

person is awaiting trial in another Federal or State Court
 (give name of court)

this person/proceeding transferred from another district
 per (circle one) FRCrP 20, 21 or 40. Show District

this is a re prosecution of charges previously dismissed which were
 dismissed on motion of:
 U.S. Atty Defense

this prosecution relates to a pending case involving this same
 defendant. (Notice of Related Case must still be filed with the
 Clerk.)

prior proceedings or appearance(s) before U.S. Magistrate Judge
 regarding this defendant were recorded under

SHOW
 DOCKET NO.

MAG. JUDGE
 CASE NO.
22-MJ-017-LDA

Place of offense RHODE ISLAND County

DEFENDANT

Issue: Warrant Summons

Location Status:

Arrest Date 3/14/2022 or Date Transferred to Federal Custody _____

Currently in Federal Custody

Currently in State Custody

Writ Required

Currently on bond

Fugitive

Defense Counsel (if any): Kensley R. Barrett/Nicholas Parrillo

FPD CJA RET'D

Appointed on Target Letter

This report amends AO 257 previously submitted

OFFENSE CHARGED - U.S.C. CITATION - STATUTORY MAXIMUM PENALTIES - ADDITIONAL INFORMATION OR COMMENTS

Total # of Counts 4

Set	Title & Section/Offense Level (Petty = 1 / Misdemeanor = 3 / Felony = 4)	Description of Offense Charged	Felony/Misd.
	See Attached Sheet.	See Attached Sheet.	<input checked="" type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor
			<input checked="" type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor
			<input checked="" type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor
			<input checked="" type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor
		Estimated trial days: 7 days	<input type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor

United States v. Sarah Jane Cavanaugh
INFORMATION COVER SHEET ATTACHMENT

Count 1: (18 U.S.C. § 1343 - Fraud by Wire, Radio, or Television)

MAX PENALTY

- a. 20 years imprisonment;
- b. \$250,000 fine;
- c. 3 years supervised release; and
- d. \$100 special assessment

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

MAX PENALTY

- a. 2 years imprisonment consecutive to underlying offense (Count 1, Wire Fraud); and
- b. \$100 special assessment

Count 3: (18 U.S.C. § 498 - Used or exhibited a military discharge certificate, knowing the same to be forged, counterfeited, or falsely altered)

MAX PENALTY

- a. Not more than 1 year imprisonment;
- b. Not greater than \$100,000 fine
- c. Up to 1 year supervised release; and
- d. \$25 special assessment

Count 4: (18 U.S.C. § 704(b) & (d)(1) – Fraudulent Use of Military Medals)

MAX PENALTY

- a. Not more than 1 year imprisonment;
- b. Not greater than \$100,000 fine;
- c. Up to 1 year supervised release; and
- d. \$25 special assessment

AO 455 (Rev. 01/09) Waiver of an Indictment

UNITED STATES DISTRICT COURT
for the
District of Rhode Island

United States of America

v.

Sarah Jane Cavanaugh

Defendant

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)
)
)
)

Case No. 1:22CR79JJM-LDA

WAIVER OF AN INDICTMENT

I understand that I have been accused of one or more offenses punishable by imprisonment for more than one year. I was advised in open court of my rights and the nature of the proposed charges against me.

After receiving this advice, I waive my right to prosecution by indictment and consent to prosecution by information.

Date: _____

Defendant's signature

Signature of defendant's attorney

Kensley Barrett/Nicholas Parrillo

Printed name of defendant's attorney

Judge's signature

Judge's printed name and title