



UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

STEPHEN GLOVER,

Defendant.

No. 2:22-cr-00260-PA

I N F O R M A T I O N

[18 U.S.C. § 1341: Mail Fraud; 18
U.S.C. § 1709: Theft of Mail
Matter by Postal Service Employee]

The United States Attorney charges:

COUNT ONE

[18 U.S.C. §§ 1341. 2(b)]

A. THE SCHEME TO DEFRAUD

1. Beginning in or around August 2020, and continuing through at least in or around June 2021, in Los Angeles County, within the Central District of California, and elsewhere, defendant STEPHEN GLOVER, together with others known and unknown to the United States Attorney, each aiding and abetting the other, knowingly and with intent to defraud, devised, participated in, and executed and attempted to execute a scheme to defraud the California Employment Development Department ("EDD"), as to material matters, and to obtain money and property from California EDD, by means of material false

1 and fraudulent pretenses, representations, and promises, and the
2 concealment of material facts.

3 2. The scheme to defraud operated, in substance, as follows:

4 a. Defendant GLOVER, who at the time was a United States
5 Postal Service ("USPS") mail carrier, would provide addresses on his
6 mail route to co-schemers, which the co-schemers would use as the
7 mailing address when filing fraudulent claims for unemployment
8 benefits from the California EDD.

9 b. Based upon those fraudulent applications, California
10 EDD would mail debit cards and other correspondence to the addresses
11 listed on the applications.

12 c. After California EDD mailed out debit cards or other
13 correspondence to those addresses on defendant GLOVER's mail route,
14 defendant GLOVER would then intercept and steal that mail.

15 d. Defendant GLOVER would then provide much of that EDD-
16 related mail to his co-schemers, which included EDD debit cards in
17 the names of others.

18 e. Defendant GLOVER would also use some of those stolen
19 EDD debit cards in the names of others to withdraw cash from ATMs.

20 B. USE OF THE MAILS

21 3. On or about June 15, 2021, within the Central District of
22 California, and elsewhere, defendant GLOVER, for the purpose of
23 executing and attempting to execute the above-described scheme to
24 defraud, willfully caused an item to be placed in an authorized
25 depository for mail matter to be sent and delivered by the USPS
26 according to the directions thereon, specifically, a letter from
27 California EDD addressed to victim R.M. at Valencia, California,
28 which contained a debit card in the name of R.M.

COUNT TWO

[18 U.S.C. § 1709]

4. On or about June 15, 2021, in Los Angeles County, within the Central District of California, defendant STEPHEN GLOVER, an employee of the United States Postal Service, stole, abstracted, and removed mail, namely, a letter from California EDD addressed to victim R.M. at Valencia, California, which had come into his possession intended to be conveyed by the United States mail.

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