

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
ABINGDON DIVISION

CLERK'S OFFICE U.S. DISTRICT COURT
AT ABINGDON, VA
FILED

NOV 06 2020

JULIA C. DUDLEY, CLERK

BY:

DEPUTY CLERK

UNITED STATES OF AMERICA

v.

STACEY POMRENKE

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Case No. 1:20CR00041-DDI

Violations: 18 U.S.C. §§ 371 & 3147

INFORMATION

COUNT ONE

The United States Attorney charges:

1. On or about and between August 19, 2016, and September 22, 2017, in the Western District of Virginia and elsewhere, STACEY POMRENKE, Kurt Pomrenke, and others, knowingly and willfully conspired to defraud the United States of and concerning its governmental functions and rights, namely, its right to have its business and its affairs, and particularly the transaction of the official business of the United States Bureau of Prisons, conducted honestly and impartially, free from corruption, fraud, improper and undue influence, dishonesty, unlawful impairment and obstruction.

2. On or about and between August 19, 2016, and September 22, 2017, in the Western District of Virginia and elsewhere, STACEY POMRENKE, Kurt Pomrenke, and others knowingly and intentionally entered into an agreement to impair the function of the United States Bureau of Prisons by providing false information to the United States Bureau of Prisons, namely, that STACEY POMRENKE routinely abused alcohol and had an alcohol addiction, so that she would be accepted into the United States Bureau of Prisons' Residential Drug Abuse Program ("RDAP") and improperly receive a sentence reduction when she completed the program.

3. To effect the objects of the conspiracy, the defendant and her co-conspirators, did acts in the Western District of Virginia and elsewhere, including, but not limited to:

- a) On or about August 22, 2016, a \$7,500.00 payment was initiated from Abingdon, Virginia from STACEY POMRENKE and Kurt Pomrenke's jointly owned credit card account to RDAP Law Consultants, LLC, a company that assisted individuals in fabricating stories about alcohol and drug abuse in order to gain admission to RDAP.
- b) On or about August 31, 2016, STACEY POMRENKE provided false information about her abuse of alcohol to her physician in Abingdon, Virginia in order to obtain a prescription for Ativan.
- c) On or about September 26, 2016, STACEY POMRENKE and Kurt Pomrenke traveled from Abingdon, Virginia to the United States Bureau of Prisons facility at Alderson, West Virginia for her to begin serving a previously imposed prison sentence. When they arrived at the facility STACEY POMRENKE was intoxicated and under the influence of alcohol and therefore was placed into detox.
- d) On or about September 27, 2016, from the Western District of Virginia, Kurt Pomrenke emailed an employee at RDAP Law Consultants, LLC, and provided an update of STACEY POMRENKE's status and relayed that they both "said the right things".
- e) On or about September 29, 2016, STACEY POMRENKE falsely claimed to a Bureau of Prisons' employee that she had a long history of alcohol abuse.

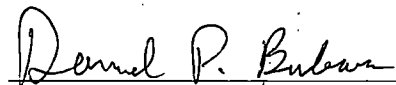
f) On or about October 31, 2016, STACEY POMRENKE falsely claimed to a Bureau of Prisons' employee that she had a long history of alcohol abuse.

g) On or about November 2, 2016, STACEY POMRENKE falsely claimed to a Bureau of Prisons' employee that she had a long history of alcohol abuse.

4. On or about and between August 19, 2016 and September 26, 2016, STACEY POMRENKE was released pursuant to 18 U.S.C. § 3141 *et. seq.*, and an order dated October 27, 2015, from the United States District Court for the Western District of Virginia, Case No. 1:15CR00033, which order notified said defendant of the potential effect of committing an offense while on release.

5. All in violation of Title 18, United States Code, Sections 371 and 3147.

This 6th day of November, 2020.



DANIEL P. BUBAR
Acting United States Attorney

by
