

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS

UNITED STATES OF AMERICA,

Plaintiff,

vs.

SARAH A. DELASHMIT

Defendant.

CRIMINAL NO. 20-30040-SMY

Title 18, United States Code,
Sections 1341, 1343, and 1028A(a)(1)

FILED

MAR 03 2020

INDICTMENT

THE GRAND JURY CHARGES:

INTRODUCTION

1. **SARAH DELASHMIT** falsely claimed she had breast cancer and genetic disorders to receive financial assistance and other benefits.

2. In October 2015 and March 2016, **SARAH DELASHMIT** falsely claimed she was diagnosed with muscular dystrophy and spinal muscular atrophy (SMA) to attend Camp Summit, a nonprofit camp serving individuals with disabilities located in Texas. While at Camp Summit, **SARAH DELASHMIT** impersonated an individual with disabilities by confining herself to a wheelchair and pretending to need assistance with most daily activities, such as getting dressed and bathing, despite being fully able to walk and care for herself. She also applied for and received financial assistance to attend Camp Summit.

3. From at least October 2017 through at least March 2018, **SARAH DELASHMIT** falsely claimed she was a breast cancer survivor to go on a trip and receive donated items through the Young Survival Coalition (YSC), a nonprofit organization serving young adults who have been diagnosed with cancer based in New York. **SARAH DELASHMIT** applied for and received a travel grant to attend the YSC National Summit in Orlando, Florida, an event for cancer survivors

and young adults living with cancer. She also applied for and received a new bicycle and cycling equipment free of charge through YSC's Tour de Pink Survivor Bike Program.

4. In addition, in May 2019, **SARAH DELASHMIT** made false statements to a credit card company and an internet retailer to fraudulently obtain a triathlon bicycle valued at \$4,499.00 without paying for it.

COUNT 1
WIRE FRAUD

1. The allegations contained in the Introduction are re-alleged and incorporated herein as if fully set forth again.

2. At all relevant times, **SARAH DELASHMIT** was an individual residing in Madison County and Jackson County within the Southern District of Illinois.

3. From at least June 22, 2015, and continuing until at least March 27, 2018, in Madison County and Jackson County, within the Southern District of Illinois, and elsewhere,

SARAH DELASHMIT,

defendant herein, knowingly devised and engaged in a scheme and artifice to defraud certain nonprofit organizations, to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, which scheme is further described below.

4. It was the object of this scheme and artifice to defraud that **SARAH DELASHMIT** obtained money, property, and other benefits from nonprofit organizations serving individuals diagnosed with genetic disabilities and breast cancer.

5. It was part of the scheme and artifice to defraud that **SARAH DELASHMIT** falsely claimed she was diagnosed with muscular dystrophy and SMA.

6. It was further part of the scheme and artifice to defraud that, on or about June 22, 2015 and on or about January 15, 2016, **SARAH DELASHMIT** applied to attend Camp Summit.

In her online applications, **SARAH DELASHMIT** falsely represented herself as a person living with muscular dystrophy and SMA.

7. It was further part of the scheme and artifice to defraud that, on or about August 25, 2015 and on or about February 19, 2016, **SARAH DELASHMIT** applied for financial aid from Camp Summit. In her applications, **SARAH DELASHMIT** submitted forms posing as an individual with the initials C.D., and provided C.D.'s social security benefit statements as proof of income.

8. It was further part of the scheme and artifice to defraud that, in October 2015 and March 2016, **SARAH DELASHMIT** attended Camp Summit posing as an individual with muscular dystrophy and SMA.

9. It was further part of the scheme and artifice to defraud that **SARAH DELASHMIT** falsely claimed she was a breast cancer survivor.

10. It was further part of the scheme and artifice to defraud that, on or about October 20, 2017, **SARAH DELASHMIT** applied for a travel grant to attend the YSC National Summit in Orlando, Florida. In her application, **SARAH DELASHMIT** falsely claimed she had been diagnosed with breast cancer and falsely claimed to have a fiancé and son that prevented her from affording to attend the event.

11. It was further part of the scheme and artifice to defraud that, on or about February 22, 2018, **SARAH DELASHMIT** attended the YSC National Summit in Orlando, Florida, posing as a breast cancer survivor.

12. It was further part of the scheme and artifice to defraud that, on or about March 27, 2018, **SARAH DELASHMIT** applied for a new bicycle and other donated cycling items through

YSC's Tour de Pink Survivor Bike Program. In her application, **SARAH DELASHMIT** falsely claimed she had been diagnosed with breast cancer.

13. It was further part of the scheme and artifice to defraud that, on or about June 7, 2018, **SARAH DELASHMIT** received a donated bicycle and other cycling items through YSC's Tour de Pink Survivor Bike Program.

14. On or about June 22, 2015, in Madison County, within the Southern District of Illinois and elsewhere,

SARAH DELASHMIT,

defendant herein, for the purpose of executing the aforesaid scheme, and attempting to do so, knowingly did cause to be transmitted by means of a wire communication in interstate commerce, from Highland, Illinois, to Dallas, Texas, certain signals, namely an online application to attend Camp Summit;

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

COUNT 2
AGGRAVATED IDENTITY THEFT

1. The allegations contained in the Introduction and paragraphs 2 to 13 of Count 1 are re-alleged and incorporated herein as if fully set forth again.

2. On or about August 25, 2015, in Madison County, within the Southern District of Illinois, and elsewhere,

SARAH DELASHMIT,

defendant herein, knowingly possessed and used, without lawful authority, a means of identification of another person, namely the social security number of an individual with the initials C.D., the defendant's possession of that means of identification was during and in relation to a felony violation enumerated in 18 U.S.C. § 1028(c), namely wire fraud, and the defendant knew

that the means of identification belonged to another actual person.

All in violation of Title 18, United States Code, Section 1028A(a)(1).

COUNT 3
WIRE FRAUD

1. The allegations contained in the Introduction and paragraphs 2 to 13 of Count 1 are re-alleged and incorporated herein as if fully set forth again.

2. On or about January 15, 2016, in Jackson County, within the Southern District of Illinois and elsewhere,

SARAH DELASHMIT,

defendant herein, for the purpose of executing the aforesaid scheme, and attempting to do so, knowingly did cause to be transmitted by means of a wire communication in interstate commerce, from Desoto, Illinois, to Dallas, Texas, certain signals, namely an online application to attend Camp Summit;

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

COUNT 4
AGGRAVATED IDENTITY THEFT

1. The allegations contained in the Introduction and paragraphs 2 to 13 of Count 1 are re-alleged and incorporated herein as if fully set forth again.

2. On or about February 19, 2016, in Madison County, within the Southern District of Illinois, and elsewhere,

SARAH DELASHMIT,

defendant herein, knowingly possessed and used, without lawful authority, a means of identification of another person, namely the social security number of an individual with the initials C.D., the defendant's possession of that means of identification was during and in relation to a

felony violation enumerated in 18 U.S.C. § 1028(c), namely wire fraud, and the defendant knew that the means of identification belonged to another actual person.

All in violation of Title 18, United States Code, Section 1028A(a)(1).

COUNT 5
WIRE FRAUD

1. The allegations contained in the Introduction and paragraphs 2 to 13 of Count 1 are re-alleged and incorporated herein as if fully set forth again.

2. On or about March 8, 2018, in Madison County, within the Southern District of Illinois and elsewhere,

SARAH DELASHMIT,

defendant herein, for the purpose of executing the aforesaid scheme, and attempting to do so, knowingly did cause to be transmitted by means of a wire communication in interstate commerce, from Highland, Illinois, to New York, New York, certain signals, namely an online reimbursement form relating to expenses incurred to attend the YSC National Summit;

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

COUNT 6
WIRE FRAUD

1. The allegations contained in the Introduction and paragraphs 2 to 13 of Count 1 are re-alleged and incorporated herein as if fully set forth again.

2. On or about February 24, 2018, in Madison County, within the Southern District of Illinois and elsewhere,

SARAH DELASHMIT,

defendant herein, for the purpose of executing the aforesaid scheme, and attempting to do so, knowingly did cause to be transmitted by means of a wire communication in interstate commerce,

from Highland, Illinois, to New York, New York, certain signals, namely an online application to receive a free bicycle through YSC's Tour de Pink Survivor Bike Program;

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

COUNT 7
MAIL FRUAD

1. On or about February 27, 2019, and continuing until at least on or about May 9, 2019, in Madison County, within the Southern District of Illinois, and elsewhere,

SARAH DELASHMIT,

defendant herein, knowingly devised and engaged in a scheme and artifice to defraud an online retailer, to obtain property by means of materially false and fraudulent pretenses, representations, and promises, which scheme is further described below.

2. It was the object of this scheme and artifice to defraud that **SARAH DELASHMIT** obtained a triathlon bicycle worth \$4,499.00 without paying for it.

3. It was part of the scheme and artifice to defraud that, on or about February 27, 2019, **SARAH DELASHMIT** purchased a triathlon bicycle for \$4,499.00 from a retailer in Miami, Florida, through the website eBay. **SARAH DELASHMIT** purchased the triathlon bicycle using a credit card issued to an individual with the initials C.D. without permission.

4. It was further part of the scheme and artifice to defraud that **SARAH DELASHMIT** caused the retailer to ship the triathlon bicycle via the United Parcel Service (UPS) from Miami, Florida, to a post office in Saint Louis, Missouri. The United State Postal Service (USPS) then finished delivery to **SARAH DELASHMIT's** Post Office (PO) Box, located in Highland, Illinois.

5. It was further part of the scheme and artifice to defraud that **SARAH DELASHMIT** picked up the triathlon bicycle from the post office.

6. It was further part of the scheme and artifice to defraud that **SARAH DELASHMIT** subsequently caused a chargeback to be filed with C.D.'s credit card company. **SARAH DELASHMIT** did not return the triathlon bicycle and the charge was removed from C.D.'s credit card account.

7. On or about April 16, 2019, in Madison County, within the Southern District of Illinois,

SARAH DELASHMIT,

defendant herein, for the purpose of executing the aforesaid scheme, and attempting to do so, knowingly did cause to be delivered by mail, according to the direction thereon, a package containing a triathlon bicycle, that package being delivered to defendant's PO Box in Highland, Illinois;

All in violation of Title 18, United States Code, Section 1341.

COUNT 8
AGGRAVATED IDENTITY THEFT

1. The allegations contained in Count 7 are re-alleged and incorporated herein as if fully set forth again.

2. On or about February 27, 2019, in Madison County, within the Southern District of Illinois, and elsewhere,

SARAH DELASHMIT,

defendant herein, knowingly possessed and used, without lawful authority, a means of identification of another person, namely account number *****9038, issued to an individual with the initials C.D., for use in connection with her Discover credit card account, the defendant's possession of that means of identification was during and in relation to a felony violation enumerated in 18 U.S.C. § 1028(c), namely mail fraud, and the defendant knew that the

means of identification belonged to another actual person.

All in violation of Title 18, United States Code, Section 1028A(a)(1).

FOREFEITURE ALLEGATION

As a result of the commission of the offense described, Count 1, 3, 5, and 6 in this Indictment,

SARAH A. DELASHMIT,

defendant herein, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(c), and Title 28, United States Code, Section 2461, any and all property constituting, or derived from, any proceeds said defendant obtained, directly or indirectly, as a result of said violation. The property to be forfeited includes, but is not limited to:

- A. Pair of black and blue Shimano Torbal Cycling shoes;**
- B. Blue Giant Avail Bicycle Serial No: C4CV3447; and**
- C. Cycling Jersey with "YSC" and "Survivor" writing.**

Additionally, as a result of the commission of the offense described, Count 7 in this Indictment,

SARAH A. DELASHMIT,

defendant herein, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(2) and Title 18, United States Code, Section 2461, any and all property constituting, or derived from, any proceeds said defendant obtained, directly or indirectly, as a result of said violation. The property to be forfeited includes, but is not limited to:

- A. Pink Quintana Roo PR Five bicycle Serial No: F87LM0879.**

A TRUE BILL

[REDACTED]

FOR PERSON



STEVEN D. WEINHOEFT
United States Attorney



LUKE J. WEISLER
Assistant United States Attorney

Recommended Bond: \$10,000 unsecured