FILED

## UNITED STATES DISTRICT COURT EASTERN DISTRICT OF TENNESSEE AT KNOXVILLE

2023 JUN -7 PM 12: 33

UNITED STATES OF AMERICA	)	US DISTRICT COURT FASTERN DIST. TENN.
v.	)	JUDGES Varlan McCook
ROBIN PEELER BLANKENSHIP	)	JODGES VATIANT TITECOOK

## <u>INDICTMENT</u>

The Grand Jury charges as follows:

#### INTRODUCTION

At all times material to this Indictment, defendant Robin Peeler Blankenship

("Blankenship"), a resident of Greenback, Tennessee, within the Eastern District of Tennessee,
was employed as an Inside Material Damage Adjuster I with the Erie Insurance Group ("Erie").

In that capacity, Blankenship was authorized to prepare insurance coverage claims for Erie
policyholders and submit those claims to Erie for payment. Beginning in 2019 and continuing
until 2021, Blankenship knowingly submitted 135 claims to Erie that she falsely and fraudulently
represented to Erie to be legitimate policyholder claims, which resulted in 144 electronic
payments of funds totaling \$132,528.72 to an account controlled by Blankenship, which funds
she then converted to her own use and benefit.

#### COUNTS 1-3

#### (Wire Fraud)

Having devised a scheme and artifice to defraud Erie and to obtain money by means of materially false and fraudulent pretenses, representations and promises, Blankenship caused to be transmitted by means of the Internet – an instrumentality of wire, radio and television communication in interstate commerce – any writings, signs, signals, pictures and sounds for the

purpose of executing such scheme and artifice, to wit, electronic payments from Erie to a financial account under the control of Blankenship, such communications occurring on the dates noted in the following separately numbered counts:

Count	Date	Description
1	4/19/2021	Electronic payment in the amount of \$1,125 by Erie to a financial account controlled by Blankenship
2	10/26/2020	Electronic payment in the amount of \$1,200 by Erie to a financial account controlled by Blankenship
3	10/21/2019	Electronic payment in the amount of \$2,975.15 by Erie to a financial account controlled by Blankenship

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

### FORFEITURE ALLEGATIONS

- 1. The foregoing paragraphs of this Indictment are hereby realleged and incorporated herein by reference for the purpose of alleging forfeitures pursuant to 18 U.S.C. §§ 981(a)(1)(C) and 28 U.S.C. § 2461.
- 2. Pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461, upon conviction of any offense in violation of 18 U.S.C. § 1343, the defendant shall forfeit to the United States any property, real or personal, constituting or traceable to the proceeds of any violation of 18 U.S.C. § 1343, including but not limited to a personal money judgment against the defendant and in favor of the United States of an amount not less than \$132,528.72.
- 3. If any of the property subject to forfeiture, as a result of any act or omission of a defendant: (a) cannot be located upon the exercise of due diligence; (b) has been transferred or

sold to, or deposited with, a third party; (c) has been placed beyond the jurisdiction of the Court; (d) has been substantially diminished in value; or (e) has been commingled with other property which cannot be divided without difficulty; the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1) and by Title 28, United States Code, Section 2461.

#### A TRUE BILL:

# SIGNATURE REDACTED

GRAND JURY FOREPERSON

FRANCIS M. HAMILTON III United States Attorney

By:

Frank M. Dale, Jr.

Assistant United States Attorney