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**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

UNITED STATES OF AMERICA

v.

ROBERT LEE SNOWDEN, JR.,

Defendant.

CRIMINAL NO. ELH-21-022

**(Conspiracy to Commit Wire Fraud,
18 U.S.C. §§1343 & 1349); Aggravated
Identity Theft, 18 U.S.C. § 1028(A);
Aiding and Abetting, 18 U.S.C. § 2)**

INFORMATION

COUNT ONE

(Wire Fraud Conspiracy)

The United States Attorney for the District of Maryland charges that:

At all times relevant to this Indictment:

1. Defendant **ROBERT LEE SNOWDEN, JR.** (“**SNOWDEN**”) was a resident of Maryland.

Manner and Means of the Conspiracy and the Scheme and Artifice to Defraud

2. It was part of the conspiracy and scheme and artifice to defraud that **SNOWDEN** and persons known and unknown to the United States Attorney, would and did use the names, social security numbers, and other personal identifying information of various individual victims, without their consent, to obtain fraudulent Supplemental Nutrition Assistance Program (“**SNAP**”) benefits from the Maryland Department of Human Resources (DHR).

3. It was further part of the conspiracy that **SNOWDEN** and others known and unknown to the United States Attorney sold the fraudulently obtained **SNAP** benefits to others for the purchase of consumer goods.

4. It was further part of the conspiracy that **SNOWDEN** and others known and unknown to the United States Attorney used the fraudulently obtained **SNAP** benefits to

purchase consumer goods for the conspirators' own use.

The Charge

5. From in or about 2013, and continuing until in or about July 2020, in the District of Maryland, the defendant,

ROBERT LEE SNOWDEN, JR.,

conspired with others known and unknown to the Grand Jury, to knowingly and willfully execute and attempt to execute a scheme and artifice to defraud financial institutions, businesses and individual victims, and to obtain money and property by means of materially false and fraudulent pretenses, representations and promises and, for the purpose of executing the scheme, caused to be transmitted by means of wire communication in interstate and foreign commerce certain signals and sounds, in violation of Title 18, United States Code, Section 1343.

18 U.S.C. § 1343 & 1349

18 U.S.C. § 2

COUNT TWO
(Aggravated Identity Theft)

The United States Attorney for the District of Maryland further charges that:

From in or about 2013, and continuing until in or about July 2020, in the District of Maryland, the defendant,

ROBERT LEE SNOWDEN, JR.,

did, during and in relation to a felony enumerated in 18 U.S.C. § 1028A(c), knowingly transfer, possess, and use, without lawful authority, a means of identification of other persons, knowing that the means of identification belonged to other persons; to wit, the defendant used and attempted to use the means of identification of over 200 individuals to unlawfully obtain SNAP benefits during and in relation to wire fraud conspiracy under 18 U.S.C. § 1349, as charged in Count One.

18 U.S.C. § 1028A(a)(1) and (c)(5)
18 U.S.C. § 2

Jonathan F. Lenzner / 
Jonathan F. Lenzner
Acting United States Attorney

Date: February 17, 2021