

S. LANE TUCKER  
United States Attorney

RYAN D. TANSEY  
Assistant U.S. Attorney  
Federal Building & U.S. Courthouse  
101 12<sup>th</sup> Avenue, Room 310  
Fairbanks, Alaska 99701  
Phone: (907) 456-0245  
Fax: (907) 456-0577  
Email: ryan.tansey@usdoj.gov

Attorneys for Plaintiff

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ALASKA

UNITED STATES OF AMERICA,	) No.
	)
Plaintiff,	) <u>COUNT 1:</u>
	) <u>WIRE FRAUD</u>
vs.	) Vio. of 18 U.S.C. § 1343
	)
KIMBERLY C. ROBINSON,	) <u>COUNT 2:</u>
	) <u>EMBEZZLEMENT</u>
Defendant.	) Vio. of 18 U.S.C. § 641
	)
	) <u>CRIMINAL FORFEITURE</u>
	) <u>ALLEGATION:</u>
	) 18 U.S.C. § 982(a)(2)(A) and (B), and
	) R. 32.2, Fed. R. Crim. P.

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INDICTMENT

The Grand Jury charges that:

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## GENERAL ALLEGATIONS

1. Beginning in or around 2003, the defendant, KIMBERLY C. ROBINSON (“ROBINSON”), joined the U.S. Fish and Wildlife Service (“USFWS”) as an administrative assistant of the agency’s Yukon Flats National Wildlife Refuge in Fairbanks, Alaska.

2. The USFWS is a bureau of the United States Department of the Interior (“DOI”).

3. In or around 2020, USFWS promoted ROBINSON to a budget analyst, GS-0560 Series 11. In that role, ROBINSON prepared and reconciled the budgets of each USFWS regional office, created cost allocations to the appropriate funding accounts, and performed collateral duties that included clerical functions, employee record timekeeping, and procuring office supplies.

4. USFWS issued Robinson a travel credit card (“Travel Card”) to pay for expenses incurred while she was on government travel, and a purchase credit card (“Purchase Card”) to be used for official government procurements for her office and staff, such as office supplies, fuel, heating oil, and office furniture.

5. Robinson was the office purchase card holder with authority to disburse up to \$2,500 for office-related supplies, equipment, payments, and other authorized needs. During COVID-19, that limit was increased to \$10,000.

6. According to USFWS policy, cardholders could only exceed their spending limit with authorization from their supervisor and were required to reconcile their expenses after each outlay by certifying and submitting the credit card statements to their supervisor.

COUNT 1  
(Wire Fraud)

7. The allegations above are realleged and incorporated as if fully set forth in this count.

8. From at least in or around 2018 until in or around June 2021, within the District of Alaska and elsewhere, the defendant, KIMBERLY C. ROBINSON, knowingly having devised and intending to devise a scheme and artifice to defraud, and for obtaining money and property by means of materially false and fraudulent pretenses, representations and promises, and concealment of material facts, transmitted and caused to be transmitted by means of wire communication in interstate and foreign commerce, writings, signs, signals, pictures, and sounds for the purpose of executing such scheme and artifice, to wit: ROBINSON engaged in a scheme to defraud the United States Department of the Interior (“DOI”), by using her government issued Travel Card and Purchase Card for unauthorized personal purchases and expenses, and then deleting and altering the unauthorized transactions on the credit card statements submitted to her supervisor for reconciliation to conceal the scheme and to cause USFWS to disburse public funds to pay the credit card balances.

All of which is in violation of 18 U.S.C. § 1343.

COUNT 2  
(Embezzlement)

9. The allegations above are realleged and incorporated as if fully set forth in this count.

10. From at least in or about 2018 until June 2021, within the District of Alaska and elsewhere, the defendant, KIMBERLY C. ROBINSON, did willfully and knowingly embezzle, steal, purloin and convert to her use money of the United States and a department and an agency thereof, to wit: USFWS and DOI, the value of which in the aggregate did exceed the sum of \$1,000.

All of which is in violation of 18 U.S.C. § 641.

CRIMINAL FORFEITURE ALLEGATION

11. The allegations set forth in Counts 1 and 2 are incorporated herein by reference for the purpose of alleging forfeiture pursuant to 18 U.S.C. § 982(a)(2)(A) and (B).

12. Pursuant to Federal Rule of Criminal Procedure 32.2, notice is hereby given to the above-named defendants that the United States will seek forfeiture as part of any sentence in accordance with 18 U.S.C. § 982(a)(2)(A) and (B), and 28 U.S.C. § 2461(c), including but not limited to all property, real or personal, which constitutes or is derived from proceeds traceable to a conspiracy to commit bank fraud, bank fraud, or aggravated identity theft, as charged in this Indictment.

All pursuant to 18 U.S.C. § 982(a)(2)(A) and (B), and Federal Rule of Criminal  
Procedure 32.2.

A TRUE BILL.

s/ Grandy Jury Foreperson  
GRAND JURY FOREPERSON

s/ Ryan D. Tansey  
RYAN D. TANSEY  
Assistant U.S. Attorney  
United States of America

s/ S. Lane Tucker  
S. LANE TUCKER  
United States Attorney  
United States of America

DATE: 1-18-23