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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

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UNITED STATES OF AMERICA : **CRIMINAL COMPLAINT**  
 :  
 -v- : Mag. No. 14-5037  
 :  
 LUIS G. ROGERS, SR. :  
 :  
 :


I, Anthony Dipietro, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

**SEE ATTACHMENT A**

I further state that I am a Special Agent with the Federal Bureau of Investigation, and that this complaint is based on the following facts:

**SEE ATTACHMENT B**

continued on the attached pages and made a part hereof.

  
\_\_\_\_\_  
Anthony Dipietro, Special Agent  
Federal Bureau of Investigation

Sworn to before me and subscribed in my presence,  
June 23, 2014 in Mercer County, New Jersey

Hon. Tonianne J. Bongiovanni  
United States Magistrate Judge

  
\_\_\_\_\_  
Signature of Judicial Officer

**RECEIVED**

JUN 23 2014

TONIANNE J. BONGIOVANNI  
U.S. MAGISTRATE JUDGE

**ATTACHMENT A**

From at least as early as in or about November 2012, through in or about April 2013, in the District of New Jersey and elsewhere, defendant

LUIS G. ROGERS, SR.

did knowingly execute and attempt to execute a scheme and artifice with intent to defraud a financial institution, namely, Liberty Bell Bank, Roma Financial and Susquehanna Bank, and to obtain money, funds and assets, owned by and under the custody and control thereof, by means of materially false and fraudulent pretenses, representations and promises.

In violation of Title 18, United States Code, Section 1344, and Title 18, United States Code, Section 2.

## ATTACHMENT B

I, Anthony Dipietro, am a Special Agent with the Federal Bureau of Investigation. I have knowledge of the following facts based upon both my investigation and discussions with other law enforcement personnel and others. Because this affidavit is being submitted for the sole purpose of establishing probable cause to support the issuance of a complaint, I have not included each and every fact known to the government concerning this matter. Where statements of others are set forth herein, these statements are related in substance and in part. Where I assert that an event took place on a particular date, I am asserting that it took place on or about the date alleged.

### Background

1. At all times relevant to this complaint:
  - a. Defendant Luis G. Rogers, Sr. (“Rogers”) resided in or around Beverly, New Jersey and was the founder and chief executive officer of Lease Group Resources, Inc. (“LGR”), an office equipment leasing company based in Mount Holly, New Jersey. In addition to LGR, Rogers was also the principal of several other entities, including University Copy Services, Inc. (“University Copy”), LGR Enterprises, Inc. (“LGR Enterprises”), LGR Consortium, Inc. (“LGR Consortium”), and the LGR Group, Inc. (“LGR Group”) (collectively, the “LGR Entities”).
  - b. Liberty Bell Bank (“Liberty Bell”) was a financial institution, as that term is defined in Title 18, United States Code, Section 20, with bank branches in Mercer County, New Jersey and elsewhere.
  - c. Roma Financial (“Roma Bank”) was a financial institution, as that term is defined in Title 18, United States Code, Section 20, with bank branches in Mercer County, New Jersey and elsewhere.
  - d. Susquehanna Bank (“Susquehanna”) was a financial institution, as that term is defined in Title 18, United States Code, Section 20, with bank branches in Mercer County, New Jersey and elsewhere. Liberty Bell, Roma Bank and Susquehanna Bank are referred to collectively as the “Banks.”
  - e. Defendant Rogers, through the LGR Entities, owned and controlled numerous accounts at Liberty Bell, Roma Bank and Susquehanna Bank (the “LGR Accounts”).

### The Scheme to Defraud the Banks

2. Beginning as early as in or about November 2012 through in or about April 2013, defendant Rogers engaged in a large-scale checking-kiting scheme that caused millions of dollars in losses to the Banks.
3. To carry out the scheme, defendant Rogers caused numerous checks to be written against the LGR Accounts, knowing that the accounts against which the checks were written did

not contain sufficient funds to cover those checks (the “Insufficient Funds Checks”). Rogers then deposited the Insufficient Funds Checks into other LGR Accounts to, among other things, artificially inflate the value of those accounts. After Rogers deposited the Insufficient Funds Checks, but before the checks were cleared, Rogers took advantage of the temporarily available funds in these accounts and used the funds to write additional checks which deposited in other LGR Accounts to temporarily cover other Insufficient Funds Checks. In or around April 2013, the Banks discovered the scheme and returned or dishonored the pending Insufficient Funds Checks and charged back the amounts of those checks against the LGR Accounts. This resulted in the LGR Accounts being overdrawn by millions of dollars.

4. A review of bank records relating to the LGR Accounts between November 2012 and April 2013 demonstrates the manner in which Rogers carried out the scheme. For example, during this time, deposits and debits in the LGR Accounts were nearly equal, the book balances at statement or monthly end and beginning were low in relation to the deposit activity or totally depleted, and the book balances did not significantly increase despite the heavy deposit activity.

5. The following chart summarizes monthly beginning and ending balances, and the dollar volume of deposits and debits, between November 2012 and April 2013, for one of the LGR Accounts:

Month	Beginning Balance	Deposits	Debits (-)	Ending Balance
November 2012	\$1,025,300.3	\$21,674,032.22	\$22,580,934.71	\$118,397.81
December 2012	\$118,397.81	\$25,053,196.30	\$25,084,229.49	\$87,364.62
January 2013	\$87,364.62	\$27,670,294.91	\$27,550,120.92	\$207,538.61
February 2013	\$207,538.61	\$26,154,998.77	\$26,169,981.72	\$192,555.66
March 2013	\$192,555.66	\$30,764,457.08	\$30,846,761.89	\$110,250.85
April 2013	\$110,250.85	\$21,129,474.21	\$21,239,725.06	\$0

As illustrated, deposits and debits were nearly equal. Also, the millions of dollars passing through this account far exceeded the monthly beginning and ending book balances. This pattern existed in the other LGR Accounts that law enforcement reviewed. In total, there was approximately \$776,672,008 deposited into the LGR Accounts during the relevant time period. This amount far exceeds LGR’s annual revenues in recent years.

6. Additionally, bank records reveal that a high percentage of transactions within each LGR Account were with other LGR Accounts. For example, in November and December 2012, approximately \$46,727,228.52 was deposited into one particular LGR Account that law enforcement reviewed. Of that amount, \$46,666,000.52, or 99.86%, came from other accounts controlled by Rogers. Similarly, during that same time period, approximately \$47,665,164.20 was debited from that account. Of that amount, \$47,116,019.09, or 98.85%, was deposited into other accounts controlled by Rogers.

7. The scheme caused significant losses to the Banks as the LGR Accounts were overdrawn in April 2013 after the check kiting activity ended. Specifically, Liberty Bell lost approximately \$3.7 million, Roma Bank lost approximately \$2.1 million, and Susequehanna lost approximately \$3 million.