



fiduciary capacity and to use all funds belonging to AAH solely for the benefit of the health and maintenance of AAH, and not for the personal use or benefit of defendant ROWAN.

4. Defendant ROBERT ROWAN, by virtue of the Power of Attorney, had access to the funds of AAH which were in accounts under the care, custody and control of, among others, PNC Bank and CoreStates Bank.

5. Between in or about September 1997 and in or about December 2001, defendant ROBERT ROWAN wrote and cashed checks, made debit card transactions, and withdrew funds at ATM machines, on the PNC Bank and CoreStates Bank accounts of AAH, which were for the personal use and benefit of defendant ROWAN and not for the sole benefit of AAH as required.

6. Between in or about January 1997 and in or about December 2001, defendant ROBERT ROWAN wrote and cashed numerous checks on the PNC Bank and CoreStates Bank accounts of AAH, which were for the personal use and benefit of defendant ROWAN and not for the sole benefit of AAH, including, but not limited to, the following personal properties:

- a) Purchase of a residence for Robert Rowan in or about January 1998 at 2029 Colonial Drive, Bristol Township, Bucks County, Pennsylvania, in the amount of \$128,900; sold by defendant ROWAN on July 9, 2001 for \$155,000;
- b) Purchase of a residence for Robert Rowan in or about October 1998 at 1005 Dolphin Drive, Bristol Township, Bucks County, Pennsylvania, in the amount of \$145,000; sold by defendant ROWAN on or about September 22, 1999 for \$150,000;

- c) Purchase of a residence for Robert Rowan in or about August 1999 at 3 West Anchor Drive, Little Egg Harbor, Ocean County, New Jersey, in the amount of \$119,900 ; sold by defendant ROWAN on or about May 17, 2001 for \$152,000; and
- d) Purchase of a residence for Robert Rowan on or about June 2001 at 318 Rosewood Avenue, Lower Southampton Township, Bucks County, Pennsylvania, in the amount of \$168,900; sold by defendant ROWAN on or about December 28, 2001 for \$183,500.

7. None of the proceeds from the sale of any of these residences, purchased by defendant ROBERT ROWAN improperly using funds which belonged to AAH, were ever repaid to AAH by defendant ROWAN.

8. Defendant ROBERT ROWAN made false and fraudulent misrepresentations to PNC Bank and CoreStates Bank by writing checks on accounts of AAH by virtue of the Power of Attorney, and obtaining funds for his own personal use, and not for the sole use and benefit of AAH, in an amount substantially in excess of the amount allowed by the Power of Attorney and by law.

9. Defendant ROBERT ROWAN defrauded AAH by violating his fiduciary duty under the Power of Attorney and used her funds for his own personal use and benefit, thereby causing a fraudulent loss to AAH in the amount of approximately \$571, 356.

10. On or about July 16, 2001, in Bucks County, in the Eastern District of Pennsylvania, defendant

**ROBERT ROWAN,**

for the purpose of executing the scheme described above, and attempting to do so, knowingly caused to be delivered by mail according to the directions thereon, a deed for the property located at 2029 Colonial Drive, Croydon, Pennsylvania from the Bucks County Recorder of Deeds to M.B., the purchaser of the property from defendant Robert Rowan.

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

---

**PATRICK L. MEEHAN**  
**United States Attorney**