

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	CRIMINAL NO.
v.	:	DATE FILED:
MARTHA RUSSELL	:	VIOLATIONS: 18 U.S.C. § 371
VIOLA BUSH	:	(conspiracy to alter records in a federal
	:	investigation - 1 count)
	:	18 U.S.C. § 1519 (alteration of records in
	:	a federal investigation - 1 count)

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

At all times material to this indictment:

1. Defendant MARTHA RUSSELL was the Chief Executive Officer of Raising Horizons Quest Charter School ("RHQ"), a secondary school operating in the Eastern District of Pennsylvania, under a charter issued by the Philadelphia School District.
2. Defendant VIOLA BUSH, the sister of defendant MARTHA RUSSELL, was the Chief Financial Officer of RHQ.
3. RHQ was a school that received in excess of \$100,000 in federal grants annually, administered by the United States Department of Education through the Pennsylvania Department of Education and the Philadelphia School District.
4. RHQ administered its budget, including the federal grants, using various bank accounts, including a credit card account through American Express.
5. Commencing in or about January 2006, the Philadelphia School District conducted an audit of RHQ.

6. From on or about January 1, 2006 until on or about February 28, 2006, in the Eastern District of Pennsylvania, and elsewhere, defendants

**MARTHA RUSSELL and
VIOLA BUSH**

conspired and agreed, together and with others known and unknown to the grand jury, to commit an offense against the United States, that is, to knowingly alter, destroy, mutilate, conceal, cover up, falsify, and make a false entry in any record, document, and tangible object, that is, American Express credit card billing statements, with the intent to impede, obstruct, and influence the investigation or proper administration of any matter within the jurisdiction of the U.S.

Department of Education, a department of the United States, in violation of Title 18, United States Code, Section 1519.

MANNER AND MEANS

7. It was part of the conspiracy that defendants MARTHA RUSSELL and VIOLA BUSH attempted to conceal their misappropriation of federal education funds by altering credit card statements for presentation to a Philadelphia School District auditor.

OVERT ACTS

In furtherance of the conspiracy, defendants MARTHA RUSSELL and VIOLA BUSH, and others known and unknown to the grand jury, committed the following overt acts in the Eastern District of Pennsylvania:

1. In or about January 2006, defendants MARTHA RUSSELL and VIOLA BUSH took credit card statements issued to RHQ by American Express to MARTHA RUSSELL's home in Blue Bell, Pennsylvania.

2. At defendant MARTHA RUSSELL's home, defendants MARTHA

RUSSELL and VIOLA BUSH altered the credit card statements by removing personal expenses incurred on the American Express account and inserting purported charges for business-related expenses.

3. Defendant MARTHA RUSSELL then faxed the altered American Express credit card statements to a coworker and instructed her to obscure the fax line on the altered statements, copy the altered statements, and provide them to the Philadelphia School District auditor.

All in violation of Title 18, United States Code, Section 371.

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 through 5 of Count One are incorporated here.
2. From on or about January 1, 2006 until on or about February 28, 2006, in the Eastern District of Pennsylvania, and elsewhere, defendants

**MARTHA RUSSELL and
VIOLA BUSH**

knowingly altered, destroyed, mutilated, concealed, covered up, falsified, and made a false entry in a record, document, and tangible object, that is, American Express credit card billing statements, with the intent to impede, obstruct, and influence the investigation or proper administration of any matter within the jurisdiction of the U.S. Department of Education, a department or agency of the United States.

In violation of Title 18, United States Code, Section 1519.

A TRUE BILL:

FOREPERSON

PATRICK L. MEEHAN
United States Attorney