

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

UNITED STATES OF AMERICA : **CRIMINAL NO. 09-485**
v. : **DATE FILED: July 17, 2009**
BRYAN EDWARD ENDERS : **VIOLATION:**
: **18 U.S.C. § 1343 (wire fraud – 1 count)**

INFORMATION

COUNT ONE

THE UNITED STATES ATTORNEY CHARGES THAT:

At all times material to this information:

1. Defendant BRYAN EDWARD ENDERS resided in the Eastern District of Pennsylvania and in southern California.

2. A person known to the United States Attorney as “B.K.” resided in Nebraska and maintained a checking account at Bank First with an account number ending in 8043 (the “Bank First account”).

3. Defendant BRYAN EDWARD ENDERS maintained a checking account at Eagle National Bank with an account number ending in 2101 (the “Eagle National Bank account”).

THE SCHEME

4. From on or about August 14, 2005, in the Eastern District of Pennsylvania and elsewhere, through on or about May 20, 2008, defendant

BRYAN EDWARD ENDERS

devised and intended to devise a scheme to defraud B.K., and to obtain money and property by means of false and fraudulent pretenses, representations and promises.

MANNER AND MEANS

It was part of the scheme that:

5. Defendant BRYAN EDWARD ENDERS, by means of false representations, induced B.K. to turn money over to him, ostensibly to invest in a real estate partnership with defendant ENDERS. Defendant ENDERS obtained money by making oral representations that were false and misleading, including that the real estate partnership had multiple experienced partners, and that the partnership had real estate investments in Miami, Florida, and New Orleans, Louisiana.

6. Defendant BRYAN EDWARD ENDERS created and sent to B.K. a fictitious, false and misleading partnership agreement, which purported to create a business partnership.

7. Defendant BRYAN EDWARD ENDERS never started or maintained a real estate partnership.

8. Defendant BRYAN EDWARD ENDERS created and sent to B.K. fictitious, false and misleading bank account statements, which falsely stated that B.K. had an interest in a bank account in Pennsylvania which contained money from the real estate partnership. Defendant ENDERS never opened a bank account for B.K. in Pennsylvania.

9. Defendant BRYAN EDWARD ENDERS never told B.K. that he had simply deposited B.K.'s money into defendant ENDERS's personal bank account and used it to pay his personal expenses.

10. When B.K. inquired about the status of the investment properties and management of investment profits, defendant BRYAN EDWARD ENDERS stalled him. After B.K. persisted in his inquires, defendant ENDERS created a fictitious persona, "S.G.," whom he claimed was an accountant. Acting as S.G. through telephone calls and electronic mail, defendant ENDERS discouraged B.K. from withdrawing funds from the fictitious real estate partnership.

11. On or about December 22, 2006, in the Eastern District of Pennsylvania and elsewhere, defendant

BRYAN EDWARD ENDERS,

for the purpose of executing the scheme described above, caused to be transmitted by means of wire communication in interstate commerce, funds in the amount of \$61,600 wired from B.K.'s Bank First account in Nebraska, to defendant ENDERS's Eagle National Bank account in Pennsylvania.

All in violation of Title 18, United States Code, Section 1343.

MICHAEL L. LEVY
United States Attorney