

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

UNITED STATES OF AMERICA	:	CRIMINAL NO.
v.	:	DATE FILED:
RAMON PABON	:	VIOLATIONS:
	:	18 U.S.C. §§ 1343, 1346 (wire fraud: deprivation of right to honest services of public employee - 1 count)
	:	18 U.S.C. § 666(a)(1)(B) (bribery - 1 count)
	:	26 U.S.C. § 7206(1) (subscribing false tax returns - 1 count)
	:	18 U.S.C. § 2 (aiding and abetting)

INFORMATION

COUNT ONE

THE UNITED STATES ATTORNEY CHARGES THAT:

Introduction

At all times material to this information:

1. The City of Philadelphia and its citizens have a right to the honest services of City of Philadelphia employees in the operation of City government.
2. From at least in or about October 2003, through at least in or about December 2008, defendant RAMON PABON was a Title Registration Aide 2 for the City of Philadelphia Records Department, Recorder of Deeds.
3. As a Title Registration Aide 2, defendant RAMON PABON was responsible for recording and filing legal instruments connected with real estate in the City of Philadelphia, and for ensuring that each deed related document complied with Philadelphia's document recording requirements.

4. As an employee of the City of Philadelphia, defendant RAMON PABON owed the City and its citizens, under the Philadelphia Code of Ethics, and Pennsylvania and common law, a duty to: (a) refrain from soliciting or accepting anything of value from any person who has financial relations with the City or whose interest may be substantially affected by the performance or nonperformance of his official duties; (b) refrain from assisting another person by representing him or her, directly or indirectly, whether or not for compensation, in any transaction involving the City; (c) disclose the nature and extent of any matter in which he has a conflict of interest; (d) forward any gift or gratuity received for a matter in which he has a conflict of interest to the head of his department or agency; and (e) disqualify himself from any further official action regarding such matter in which he has a conflict of interest.

5. It was a conflict of interest for defendant Ramon Pabon to assist individuals in the purchase and sale of properties by preparing and filing deeds and other real estate related documents with the City of Philadelphia Records Department, Recorder of Deeds, for a fee.

The Scheme

6. From at least in or about October 2003, through at least in or about December 2008, defendant RAMON PABON engaged in a scheme to defraud the City of Philadelphia and its citizens of the right to defendant PABON's honest services in the affairs of the City of Philadelphia, and to obtain money and property by means of false and fraudulent pretenses, representations, and promises, and violated his ethical duties to the City of Philadelphia and its citizens as follows:

a. Defendant RAMON PABON, for a fee, assisted individuals in the

purchase and sale of property in the City of Philadelphia by: (i) investigating properties to determine if taxes and other monies were owed on the properties; (ii) preparing deeds and other real estate related documents needed to purchase and sell the properties; (iii) obtaining signatures on the deeds and other related real estate related documents; (iv) filing the deeds and the other related real estate related documents with the City of Philadelphia; and (v) providing copies of the filed documents to the individuals.

b. Defendant RAMON PABON, for a fee, knowingly and willfully prepared and filed, and assisted in preparing and filing, fraudulent deeds, that is, deeds that were allegedly signed by the titled owners transferring their ownership in interest in their real estate. The titled owners, in fact, did not sign the deeds, the titled owners were not aware of the deeds being signed and filed, and the titled owners did not agree to the signing and filing of the deeds.

c. Defendant RAMON PABON, for a fee, knowingly and willfully prepared and filed at least one fraudulent mortgage document that falsely stated the mortgage had been satisfied, when, in fact, the mortgage had not been satisfied.

d. Defendant RAMON PABON received over \$46,295 in fees for these real estate related matters.

e. Defendant RAMON PABON did not disclose to the City of Philadelphia the nature and extent of these real estate related matters in which he engaged or the fees he collected, did not forward to the City of Philadelphia any of the fees he received, did not disqualify himself from any further official actions regarding these matters, and did not report the income he received from these real estate transactions on his federal income tax returns.

7. On or about November 20, 2007, in the Eastern District of Pennsylvania, and elsewhere, defendant

RAMON PABON,

having devised a scheme to defraud the City of Philadelphia and its citizens of the right to defendant PABON's honest services in the affairs of the City of Philadelphia, and to obtain money and property by means of false and fraudulent pretenses, representations, and promises, for the purpose of executing the scheme to defraud, and attempting to do so, knowingly caused to be transmitted, and aided and abetted the transmission of, by means of wire communication in interstate commerce, the following signals and sounds: an e-mail sent from The Clearing House, in New York, to Commerce Bank, in New Jersey, directing the transfer of funds for the deposit of a \$625.00 check, drawn on B.M.'s account at Commerce Bank, in New Jersey, into defendant RAMON PABON's account at Wachovia Bank, in Philadelphia, Pennsylvania, as payment to defendant PABON of his fees for preparing and filing a deed and transfer tax forms for 3426 North Marshall Street, in Philadelphia, Pennsylvania.

All in violation of Title 18, United States Code, Sections 1343, 1346, and 2.

COUNT TWO

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

At all times material to this indictment:

1. Paragraphs 1 to 5 of Count One of this information are incorporated here.

2. The City of Philadelphia Records Department constituted a local government agency which received annual benefits in excess of \$10,000 in calendar year 2007 under Federal programs involving grants, contracts, subsidies, loans, guarantees, and other forms of federal assistance.

3. Defendant RAMON PABON was an employee of the City of Philadelphia Records Department, and as such was its agent.

4. On or about November 20, 2007, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendant

RAMON PABON,

while acting as an agent of a government agency which received benefits of over \$10,000 in a one-year period under a federal program involving a grant, contract, subsidy, loan and other form of federal assistance, corruptly solicited, demanded for the benefit of any person, accepted, and agreed to accept a thing of value, that is, a \$2,000 check, intending to be influenced and rewarded in connection with a transaction and series of transactions of the Records Department of the City of Philadelphia involving \$5,000 or more, that is, the sale and transfer of 4027 North 6th Street, in Philadelphia, Pennsylvania.

In violation of Title 18 United States Code, Section 666(a)(1)(B), (b).

COUNT THREE

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

1. Paragraphs 1 to 5 of Count One of this information are incorporated here.
2. On or about the following dates, in the Eastern District of

Pennsylvania and elsewhere, defendant

RAMON PABON

willfully made and subscribed the following Forms 1040, U.S. Individual Income Tax Returns, for the following tax years, which were verified by a written declaration that the returns were made under the penalty of perjury and filed with the Director of the Internal Revenue Service at the following locations, and which defendant RAMON PABON did not believe to be true and correct as to every material matter, in that the returns reported total adjusted gross income of approximately the following amounts, when, as defendant RAMON PABON knew and believed, the actual total adjusted gross income was approximately as follows:

<u>Date Filed</u>	<u>Tax Year</u>	<u>Location Filed</u>	<u>Reported Total Adjusted Gross Income</u>	<u>Actual Total Adjusted Gross Income</u>
February 27, 2008	2006	Andover, Massachusetts	\$60,618	\$128,618
April 23, 2008	2007	Kansas City, Missouri	\$60,205	\$68,205
January 29, 2009	2008	Andover, Massachusetts	\$73,461	\$102,756

In violation of Title 26, United States Code, Section 7206(1).

MICHAEL L. LEVY
UNITED STATES ATTORNEY