

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

**UNITED STATES OF AMERICA** : **CRIMINAL NO. 11-\_\_\_\_\_**  
**v.** : **DATE FILED: November , 2011**  
**JACKIEM WRIGHT** : **VIOLATIONS:**  
**REGINALD BERRY** : **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. The Office of the Sheriff, City and County of Philadelphia (“Philadelphia Sheriff’s Office”), sold properties subject to mortgage foreclosure, tax liens and tax delinquency at Sheriff’s sales.
2. The Philadelphia Sheriff’s Office was responsible for paying the expenses, debts and liens owing with regard to the properties sold at Sheriff’s sale.

**THE SCHEME**

3. From in or about 2009, to in or about 2010, defendants

**JACKIEM WRIGHT  
and  
REGINALD BERRY**

devised and intended to devise a scheme to defraud the Philadelphia Sheriff’s Office 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:

4. Defendants JACKIEM WRIGHT and REGINALD BERRY knowingly obtained from Robert Rogers, who is charged elsewhere, checks fraudulently drawn on bank accounts of the Philadelphia Sheriff's Office that were made payable to a company known to the United States Attorney ("fraudulent checks") and that totaled approximately \$147,555.36.

5. Defendants JACKIEM WRIGHT and REGINALD BERRY assisted in depositing the fraudulent checks into the bank account of the company known to the United States Attorney.

6. Defendants JACKIEM WRIGHT and REGINALD BERRY assisted in withdrawing and in attempting to withdraw the proceeds of the fraudulent checks from the bank account of the company known to the United States Attorney, and defendants WRIGHT and BERRY shared the proceeds from the fraudulent checks that they were able to withdraw with Robert Rogers.

7. On or about the date set forth below, in Philadelphia, Pennsylvania, in the Eastern District of Pennsylvania, and elsewhere, defendants JACKIEM WRIGHT and REGINALD BERRY, for the purpose of executing the scheme described above, and attempting to do so, caused to be transmitted by means of wire communication in interstate and foreign commerce the signals and sounds described below:

<b>DATE</b>	<b>DESCRIPTION</b>
December 10, 2009	An image of a \$36,466.02 fraudulent check drawn on the Philadelphia Sheriff's Office account, payable to a company known to the United States Attorney, electronically transmitted by TD Bank from Mount Laurel, New Jersey, to Toronto, Canada



All in violation of Title 18, United States Code, Sections 1343 and 1349.

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**ZANE DAVID MEMEGER**  
**United States Attorney**