

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

UNITED STATES OF AMERICA : **CRIMINAL NO. 11-_____**
v. : **DATE FILED: November , 2011**
ROBERT ROGERS : **VIOLATIONS:**
: **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 2007, to in or about 2010, defendant

ROBERT ROGERS

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. Defendant ROBERT ROGERS knowingly obtained from Richard Bell, who is charged elsewhere, checks fraudulently drawn on bank accounts of the Philadelphia Sheriff's Office that were made payable to defendant ROGERS and to other unauthorized individuals and companies known to the United States Attorney ("fraudulent checks") and that totaled over \$400,000.

5. Defendant ROBERT ROGERS cashed the fraudulent checks made payable to defendant ROGERS.

6. Defendant ROBERT ROGERS forwarded to Jackiem Wright and Reginald Berry, who are charged elsewhere, and to other persons known to the United States Attorney, the fraudulent checks made payable to the other unauthorized individuals and companies, for Wright, Berry and the other recipients of the checks to deposit into their bank accounts or cash.

7. Defendant ROBERT ROGERS shared the proceeds from these fraudulent checks with Richard Bell and with the recipients of the checks, including Jackiem Wright and Reginald Berry.

8. On or about the date set forth below, in Philadelphia, Pennsylvania, in the Eastern District of Pennsylvania, and elsewhere, defendant ROBERT ROGERS, 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:

DATE	DESCRIPTION
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.

ZANE DAVID MEMEGER
United States Attorney