



5. Defendant DANIEL APOKORIN held himself out as an expediter who could help A.P., A.B., and S.M. purchase the Property.

### **THE CONSPIRACY**

6. From in or about March, 2011 to on or about April 28, 2011, in the Eastern District of Pennsylvania, and elsewhere, defendant

### **DANIEL APOKORIN**

conspired and agreed, together and with others known to the grand jury, to commit offenses against the United States, that is, to knowingly devise a scheme to defraud the City of Philadelphia and its citizens of the right to Public Employee #1's honest services in the affairs of the City of Philadelphia, through bribery, and to use interstate wire communications to further the scheme to defraud, in violation of Title 18, United States Code, Sections 1343, 1346, and 2.

### **MANNER AND MEANS**

7. It was part of the conspiracy that defendant DANIEL APOKORIN and others known to the grand jury wanted to secure favorable treatment from a Commerce Department employee in obtaining a parcel of land in Philadelphia.

8. It was further part of the conspiracy that defendant DANIEL APOKORIN and others known to the grand jury surreptitiously gave Public Employee #1 and an undercover officer two separate payments of \$5,000 to try to obtain favorable treatment from the Commerce Department.

## **OVERT ACTS**

In furtherance of the conspiracy, defendant DANIEL APOKORIN and others known to the grand jury, committed the following overt acts in the Eastern District of Pennsylvania and elsewhere:

1. In or about March, 2011, defendant DANIEL APOKORIN approached Public Employee #1, a Commerce Department employee for the City of Philadelphia, about the purchase of the Property.

2. In or about March, 2011, defendant DANIEL APOKORIN, A.B., and S.M. scheduled a meeting with Public Employee #1 to discuss the steps necessary to purchase the Property.

3. On or about March 24, 2011, defendant DANIEL APOKORIN, A.B., and S.M. met Public Employee #1 and notified him of their intent to purchase the Property through the condemnation process.

4. On or about March 24, 2011, at the end of their meeting, defendant DANIEL APOKORIN handed Public Employee #1 an envelope containing \$5,000, which he had obtained from A.P., A.B., and S.M.

5. On or about March 24, 2011, defendant DANIEL APOKORIN, unaware that Public Employee #1 had notified law enforcement about the envelope containing \$5,000, e-mailed Public Employee #1 from his Yahoo.com account to confirm that Public Employee #1 had received the contents of the envelope and to ask him to see what he could do to help them purchase the Property.

6. On or about March 25, 2011, defendant DANIEL APOKORIN e-mailed Public Employee #1 that “If there is a chance to avoid an extra hustle, we would like that better. Like you and me discussed before. Please let me know.”

7. On or about April 5, 2011, defendant DANIEL APOKORIN and A.P. met with an undercover officer, who they believed was a middleman between Public Employee #1 and the Redevelopment Authority (RDA), in a coffee shop.

8. On or about April 5, 2011, defendant DANIEL APORKORIN told the undercover officer that they would not provide additional cash until there was a guarantee that they would own the Property.

9. On or about April 15, 2011, defendant DANIEL APOKORIN and A.P. met again with the undercover officer at a coffee shop, and received a fictitious Redevelopment Authority agreement that guaranteed ownership of the Property to A.P., A.B., and S.M.

10. On or about April 21, 2011, defendant DANIEL APOKORIN e-mailed Public Employee #1 attempting to set up a meeting to further discuss the purchase of the property.

11. On or about April 28, 2011, defendant DANIEL APOKORIN, A.P., A.B., and S.M. met the undercover officer at a restaurant in South Philadelphia. After signing the Redevelopment Authority agreement, A.P. slid a manila envelope, containing \$5,000, to the undercover officer.

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

**COUNTS TWO TO FOUR**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. Paragraphs 1 through 5 and 7 through 8, and Overt Acts One through Eleven of Count One of this indictment are incorporated here.

2. On or about the following dates, in the Eastern District of Pennsylvania and elsewhere, defendant

**DANIEL APOKORIN**

and others known to the grand jury, having devised a scheme to defraud the City of Philadelphia and its citizens of the right to Public Employee #1's honest services in the affairs of the City of Philadelphia by bribery, 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 signals and sounds described below for each count, each transmission constituting a separate count:

COUNT	DATE	SENDER	RECIPIENT	ITEM
2	March 24, 2011	Daniel Apokorin	Public Employee #1	e-mail asking Public Employee #1 if he had received the contents of the envelope delivered earlier that day and asking to see what he could do to help the buyers purchase the Property
3	March 25, 2011	Daniel Apokorin	Public Employee #1.	e-mail suggesting to Public Employee #1 that if there was a chance to avoid "an extra hustle" in purchasing the Property that the buyers would be

				happy
<b>COUNT</b>	<b>DATE</b>	<b>SENDER</b>	<b>RECIPIENT</b>	<b>ITEM</b>
4	April 21, 2011	Daniel Apokorin	Public Employee#1	e-mail attempting to set up a further meeting with Public Employee #1 to discuss the purchase of the Property

All in violation of Title 18, United States Code, Sections 1343 , 1346, 1349 and 2.

**A TRUE BILL:**

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**GRAND JURY FOREPERSON**

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**ZANE DAVID MEMEGER  
UNITED STATES ATTORNEY**