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FILED

SEP 25 2017

CLERK U.S. DISTRICT COURT
WEST. DIST. OF PENNSYLVANIA

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA

v.

KEITH ALAN BASSI

Criminal No. 17-257

INFORMATION

The United States Attorney charges:

INTRODUCTION

1. At all times material hereto, the defendant, KEITH ALAN BASSI, was a licensed Pennsylvania attorney practicing in the law firm of Bassi, Vreeland and Associates, P.C., in Charleroi, Pennsylvania.

2. At all times material hereto, BASSI held a durable general power of attorney (hereafter, POA) on behalf of a person known to the grand jury as 'N.J.L.' in which N.J.L. appointed Bassi as the "true and lawful attorney, agent and guardian" of N.J.L.'s estate. The POA directed BASSI to "exercise the powers for the benefit of the principal," to "keep the [principal's] funds separate from the agent's funds", and to invest in the principal's name "as my agent or agents deem best."

3. Beginning in and around early 2012, N.J.L. was diagnosed with dementia and Alzheimer's disease, and determined to be mentally incompetent.

4. Since approximately May, 2012, N.J.L. has been living in a personal care home, and by 2015, due to a deteriorating mental state, was placed in the dementia unit of the care facility.

5. Upon information and belief, N.J.L. has no known living family members or offspring other than distant cousins.

6. In 2012, N.J.L. owned assets in fixed annuity instruments at John Hancock and Great America Life insurance companies, as well as other assets.

THE SCHEME AND ARTIFICE

7. Beginning in and around June, 2013, and continuing thereafter until in and around October, 2016, in the Western District of Pennsylvania and elsewhere, the defendant, KEITH ALAN BASSI, (hereafter, BASSI), devised, and intended to devise, a scheme and artifice to defraud and for obtaining money by means of materially false and fraudulent pretenses, representations and promises, or material omissions, well knowing at the time that the pretenses, representations and promises were false and fraudulent when made.

8. It was a part of the scheme and artifice that beginning around June, 2013, BASSI determined to use a durable power of attorney, which was originally executed by N.J.L. for the purpose of her material care, investments and compensation for services rendered, to instead misappropriate assets from the estate of N.J.L. for his personal use.

9. It was a part of the scheme and artifice that in and around November, 2012, BASSI purchased a variable life insurance policy with guarantor, Pacific Life Insurance Company (Pacific Life), which policy insured him and contained a \$1.2 million dollar death benefit for a person known to the United States Attorney as B.B. (not a defendant herein).

10. It was further a part of the scheme and artifice to defraud that in and around November, 2013, BASSI instructed financial planning company Janney Montgomery Scott, LLC, which held N.J.L.'s assets, to issue a check payable to either 'N.J.L.' or to 'Pacific Life' in the amount of \$65,000, which check was mailed to BASSI who deposited it into his personal checking account at Charleroi Federal Savings Bank (CFS).

11. It was further a part of the scheme and artifice to defraud that on or about November 13, 2013, BASSI misappropriated N.J.L.'s funds and mailed a check in the amount of \$55,000.00

from his personal CFS checking account, to Pacific Life in Pasadena, California, to pay for the 2014 annual premium for the variable life policy at Pacific Life.

12. It was further a part of the scheme and artifice to defraud that on or about November 13, 2014, BASSI requested another check from Janney Montgomery Scott, LLC, in the amount of \$55,000.00, made payable to "Pacific Life, f/b/o N.J.L./Keith A. Bassi", which BASSI then misappropriated and mailed to Pacific Life to pay for the 2015 annual premium for the variable life policy at Pacific Life.

13. It was further a part of the scheme and artifice to defraud that on or about November 23, 2015, BASSI misappropriated N.J.L.'s assets and mailed a bank check in the amount of \$55,000.00 payable to Pacific Life, to pay for the 2016 annual premium payment for the variable life policy at Pacific Life.

14. It was further a part of the scheme and artifice to defraud that on or about September 27, 2016, BASSI submitted a "surrender request" to Pacific Life, and requested a surrender of the variable life policy. The next day, Pacific Life mailed a "surrender statement" and a check payable to BASSI in the amount of \$163,086.32.

15. It was further a part of the scheme and artifice to defraud that on or about October 17, 2016, BASSI deposited the Pacific Life surrender check into a previously opened PNC Bank Money Market account opened by BASSI.

16. It was further a part of the scheme and artifice to defraud that BASSI determined to misappropriate N.J.L.'s assets to operate Mid-Mon Valley Publishing Company in which Bassi held an ownership interest.

17. It was further a part of the scheme and artifice to defraud that on or about February 8, 2016, BASSI misappropriated \$50,000.00 from N.J.L. assets, and deposited the funds into a

checking account at CFS Bank held in an account named 'Mid-Mon Valley Publishing Company' as an initial opening deposit amount.

18. It was further a part of the scheme and artifice to defraud that between July and August, 2016, BASSI misappropriated approximately \$60,000.00 of N.J.L.'s funds, and transferred them into the Mid-Mon Valley Business and Payroll accounts at CFS Bank, which funds were used for the operation of Mid-Mon Valley Publishing.

19. It was further a part of the scheme and artifice to defraud that between November, 2013, and May, 2014, BASSI misappropriated approximately \$74,876.26 of N.J.L.'s assets from Janney Montgomery Scott, LLC, into his personal checking account at CFS Bank.

20. It was further a part of the scheme and artifice to defraud that between July, 2014 and July, 2016, BASSI further misappropriated approximately \$136,473.04 of N.J.L.'s assets into his personal savings account at CFS Bank.

21. It was further a part of the scheme and artifice to defraud that on or about September, 30, 2016, BASSI created a Money Market account at PNC Bank, and deposited approximately \$72,429.61 of N.J.L.'s assets into the account.

22. It was further a part of the scheme and artifice to defraud that on or about October 17, 2016, BASSI deposited the surrender check from the Pacific Life policy, in the amount of \$163,086.32, into his Money Market account at PNC Bank.

The Mailings

23. On or about the dates set forth below, in the Western District of Pennsylvania and elsewhere, the defendant, KEITH A. BASSI, for the purposes of executing the aforesaid scheme and artifice to defraud, and in attempting to do so, did place and cause to be placed in authorized depositories for United States mail matter, the mail matter listed below to be sent and delivered by the United States Postal Service, according to the directions thereon, specifically, the defendant, KEITH A. BASSI, mailed checks which contained payments for annual premiums on a life insurance policy, from Fayette City, Pennsylvania, to Pacific Life Insurance Co. in Pasadena, California, each such use of the mail being a separate count of this Information:

COUNT	DATE	SENDER	ADDRESS
1	November 13, 2013	109 Mood Lane, Fayette City, PA 15438	Pacific Life Insurance Company, Pasadena, CA 91189
2	November 13, 2014	109 Mood Lane, Fayette City, PA 15438	Pacific Life Insurance Company, Pasadena, CA 91189
3	November 23, 2015	109 Mood Lane, Fayette City, PA 15438	Pacific Life Insurance Company, Pasadena, CA 91189

In violation of Title 18, United States Code, Section 1341.

CRIMINAL FORFEITURE ALLEGATION

24. The United States hereby gives notice to the defendant charged in Counts One through Three that, upon his conviction of such offenses, the government will seek forfeiture in accordance with Title 18, United States Code, Sections 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), which requires any person convicted of such offenses to forfeit any property constituting or derived from proceeds obtained directly or indirectly as a result of such offenses, including but not limited to the following:

Funds totaling \$235,515.93 contained in a Money Market account ending in account number 9918 held at PNC Bank.

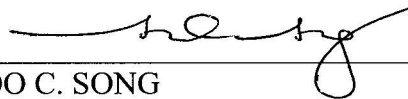
25. MONEY JUDGMENT

A sum of money equal to at least approximately \$269,616.02 in United States currency;

26. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of such defendant up to the value of the forfeitable property described in this forfeiture allegation.

A handwritten signature in black ink, appearing to read 'Soo C. Song', written over a horizontal line.

SOO C. SONG
Acting United States Attorney
DC ID No. 457268

Judge's printed name and title

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA

v.

KEITH ALAN BASSI

)
)
)
)
)

Criminal No.

17-257

ARRAIGNMENT PLEA

Defendant KEITH ALAN BASSI

being arraigned, pleads _____

in open Court this _____ day of

_____, 2017.

(Defendant's Signature)

(Attorney for Defendant)

17-257

CRIMINAL CASE INFORMATION SHEETPittsburgh X

Erie _____

Johnstown _____

Related to Nos. _____ Judge _____

(All criminal prosecutions arising out of the same criminal transaction or series of transactions are deemed related).

- CATEGORY: 1. _____ Narcotics and Other Controlled Substances
 1a. _____ Narcotics and Other Controlled Substances
 (3 or more Defendants)
 2. X Fraud and Property Offenses
 2a. _____ Fraud and Property Offenses
 (3 or more Defendants)
 3. _____ Crimes of Violence
 4. _____ Sex Offenses
 5. _____ Firearms and Explosives
 6. _____ Immigration
 7. _____ All Others

Defendant's name: KEITH ALAN BASSIIs Indictment waived: X yes _____ noPretrial Diversion: _____ yes X noJuvenile proceeding: _____ yes X noDefendant is: X Male _____ FemaleSuperseding Indictment or
Information: _____ yes X no

Previous case number: _____

If superseding, previous case was/will be:

- _____ Dismissed on defendant's motion
 _____ Dismissed on government's motion
 _____ After appellate action
 _____ Other (explain)

County in which first
offense cited occurred: Washington County, PAPrevious proceedings before
Magistrate Judge: _____

Case No.: _____

PLEASE INCORPORATE MAGISTRATE CASE WITH CRIMINAL CASE

Date arrested or date
continuous U.S. custody began: _____

Defendant: _____ is in custody X is not in custody

Name of Institution: _____

Custody is on: _____ this charge _____ another charge

_____ another conviction

_____ State _____ Federal

Detainer filed: _____ yes X no

Date detainer filed: _____

Total defendants: 1

Total counts: 3

Data below applies to
defendant No.: 1


Defendant's name: KEITH A. BASSI

SUMMARY OF COUNTS

<u>COUNTS</u>	<u>U.S. CODE</u>	<u>OFFENSE</u>	<u>FELONY</u>
1-3	18 U.S.C. § 1341	Mail Fraud	X
		FORFEITURE ALLEGATION	

I certify that to the best of my knowledge the above entries are true and correct.

DATE: _____


 GREGORY C. MELUCCI
 Assistant U.S. Attorney
 PA ID No. 56777