

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

**UNITED STATES OF AMERICA** : **CRIMINAL NO. 14-**  
**v.** : **DATE FILED: 3 -11-14**  
**JEROLD J. COHEN** : **VIOLATIONS:**  
: **18 U.S.C. § 371 (conspiracy - 1 count)**  
: **31 U.S.C. § 5324(a)(3) (aggravated**  
: **structuring - 1 count )**  
: **26 U.S.C. § 7206 (filing a false return –**  
: **2 counts)**

**INFORMATION**

**COUNT ONE**

**THE UNITED STATES ATTORNEY CHARGES THAT:**

At all times material to this information:

1. Defendant JEROLD J. COHEN operated a sports bookmaking operation in the Philadelphia area, accepting bets from others on various sporting events, collecting debts, and distributing winnings.
2. From in or about May 2009, to in or about January 2011, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**JEROLD J. COHEN**

conspired and agreed, with others known and unknown to the United States Attorney, to commit an offense against the United States, that is, for the purpose of evading the reporting requirements of Title 31, United States Code, Section 5313(a) and the regulations promulgated thereunder, to knowingly structure and assisted in structuring, transactions with Wachovia Bank, Cottman Check Cashing, Liberty, Inc., Wilson's Check Cashing, TC Financial DE, Richmond Financial, Bob's

Check Cashing Company, Terminal Pub Check Cashing, and Five Points Check Cashing, domestic financial institutions, as part of a pattern of illegal activity involving transactions of more than \$100,000 in a twelve-month period, in violation of Title 31, United States Code, Section 5324(a)(3) and (d)(2).

### **MANNER AND MEANS**

3. It was part of the conspiracy that defendant JEROLD J. COHEN accepted bettors' gambling debt payments in the form of checks, which were made out in amounts just under \$10,000, which he and others cashed at a bank and check cashing agencies.

It was further a part of the conspiracy that:

4. In order to settle a gambling debt to defendant JEROLD J. COHEN of over \$10,000, sometimes bettors delivered all at once multiple checks, all of them made out for just under \$10,000.

5. From in or about May 2009, to in or about January 2011, defendant JEROLD J. COHEN cashed and caused to be cashed over 170 checks, each made out for just under \$10,000, for a total of \$1,550,175, which was income he received in connection with his operation of a bookmaking operation.

### **OVERT ACTS**

In furtherance of the conspiracy and to accomplish its object, defendant JEROLD J. COHEN committed the following overt acts, among others, in the Eastern District of Pennsylvania, that is, on or about the following dates, he cashed and caused to be cashed the following checks from others to settle gambling debts to him:

<b>OVERT ACT</b>	<b>DATE</b>	<b>CHECKING ACCOUNT INSTITUTION</b>	<b>LAST FOUR DIGITS OF CHECKING ACCOUNT NUMBER</b>	<b>PAYEE</b>	<b>AMOUNT</b>
1	6/26/2009	Beneficial Bank	0456	Cash	\$9,000
2	6/29/2009	Beneficial Bank	0456	Cash	\$9,000
3	7/1/2009	Beneficial Bank	0456	Cash	\$9,000
4	7/6/2009	Beneficial Bank	0456	Cash	\$9,000
5	7/8/2009	Beneficial Bank	0456	Cash	\$9,000
6	7/14/2009	Beneficial Bank	0456	Cash	\$9,000
7	7/21/2009	Beneficial Bank	0456	Cash	\$9,000
8	7/23/2009	Beneficial Bank	0456	Cash	\$9,000
9	7/29/2009	Beneficial Bank	0456	Cash	\$9,000
10	7/31/2009	Beneficial Bank	0456	Cash	\$9,000

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

**COUNT TWO**

**THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:**

1. Paragraphs 1 and 3 through 5 of Count One of this information are incorporated here.

2. From in or about January 2010, through in or about December 2010, in the Eastern District of Pennsylvania, defendant

**JEROLD J. COHEN,**

for the purpose of evading the reporting requirements of Title 31, United States Code, Section 5313(a) and the regulations promulgated thereunder, knowingly structured and assisted in structuring, transactions with Wachovia Bank, Cottman Check Cashing, Terminal Pub Check Cashing, Five Points Check Cashing, and TC Financial DE, domestic financial institutions, as part of a pattern of illegal activity involving transactions of more than \$100,000 in a twelve-month period, that is, cashing approximately 98 checks, each for under \$10,000 and totaling approximately \$848,500.

In violation of Title 31, United States Code, Sections 5324(a)(3) and (d)(2).

**COUNTS THREE AND FOUR**

**THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:**

1. Paragraphs 1 and 3 through 5 of Count One of this information are incorporated here.

2. During 2009, defendant JEROLD J. COHEN received at least \$591,875 in gambling proceeds. On his 2009 federal income tax return, he claimed only \$132,690 in gambling winnings, underreporting his gambling income by \$459,185.

3. During 2010, defendant JEROLD J. COHEN received at least \$848,500 in gambling proceeds. On his 2010 federal income tax return he claimed only \$125,495 in gambling winnings, underreporting his gambling income by \$723,005.

4. On or about the dates set forth below, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**JEROLD J. COHEN**

willfully made and subscribed the United States income tax returns below, Forms 1040, for the calendar years set forth below, which were verified by a written declaration that they were made under the penalty of perjury and filed with the Internal Revenue Service which defendant JEROLD J. COHEN did not believe to be true and correct as to every material matter, in that each return underreported income from the defendant's bookmaking operation by at least \$450,000.

<b>COUNT</b>	<b>DATE</b>	<b>CALENDAR YEAR</b>
3	April 15, 2010	2009
4	October 11, 2011	2010

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

**NOTICE OF FORFEITURE**

**THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:**

1. The allegations contained in Count Two of this information are hereby realleged and incorporated by reference for the purposes of alleging forfeiture pursuant to Title 31, United States Code, Section 5317.

2. Pursuant to Title 31, United States Code, Section 5317, upon conviction of an offense in violation of Title 31, United States Code, Section 5324, the defendant,

**JEROLD J. COHEN,**

shall forfeit to the United States of America, the currency involved in the commission of such offense, including, but not limited to: \$1,550,175 in United States currency.

3. If any of the property described above, 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 intention of the United States, pursuant to Title 31, United States Code, Section 5317(c)(1)(B), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property subject to forfeiture.

All pursuant to Title 31, United States Code, Section 5317(c).

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ZANE DAVID MEMEGER  
UNITED STATES ATTORNEY