

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

UNITED STATES OF AMERICA	:	CRIMINAL NO. _____
v.	:	DATE FILED: _____
TIFFANY ROBERSON	:	VIOLATION:
	:	18 U.S.C. § 656 (embezzlement of bank funds by bank employee - 1 count)
		Notice of Forfeiture

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

At all times material to this Indictment:

1. Hyperion Bank was a financial institution whose deposits were insured by the Federal Deposit Insurance Corporation.
2. Defendant Tiffany Roberson was an assistant manager at Hyperion Bank’s corporate office and branch at 199 West Girard Avenue, in Philadelphia, Pennsylvania.
3. From in or about September 2010, through on or about November 17, 2010, in the Eastern District of Pennsylvania, defendant

TIFFANY ROBERSON,

being an employee, that is, an assistant manager, of Hyperion Bank, the deposits of which were insured by the Federal Deposit Insurance Corporation, knowingly embezzled, abstracted, purloined, and willfully misapplied approximately \$20,000 in moneys and funds of, and moneys and funds intrusted to the custody and care of, Hyperion Bank.

In violation of Title 18, United States Code, Section 656.

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

1. As the result of the violation of Title 18, United States Code, Section 656, as charged in Count One, defendant

TIFFANY ROBERSON

shall forfeit to the United States any and all property constituting, or derived from, proceeds obtained directly or indirectly, as the result of such violation, including, but not limited to the sum of \$19,308.

2. If any of the property subject to forfeiture, 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 18, United States Code, Section 982(b), incorporating 21 U.S.C. § 853(p), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable

property.

All pursuant to Title 18, United States Code, Section 982(a)(2).

A TRUE BILL:

GRAND JURY FOREPERSON

**ZANE DAVID MEMEGER
UNITED STATES ATTORNEY**