



**ROBERT VON RYAN**

knowingly executed and attempted to execute a scheme to defraud UBS AG and to obtain moneys owned by and under the care, custody and control of UBS AG by means of false and fraudulent pretenses, representations and promises.

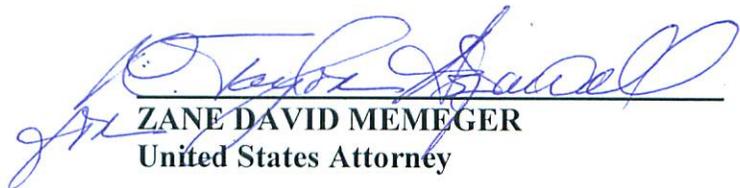
**THE SCHEME**

It was part of the scheme that from in or about late 2009/early 2010, through in or about 2012:

6. Defendant ROBERT VON RYAN , while guarding Philadelphia Eagles football players' cars, entered T. H.'s vehicle and unbeknownst to T. H., copied T. H.'s UBS AG checking account number and checking account routing number.

7. Defendant ROBERT VON RYAN, unbeknownst to T. H., used T.H.'s UBS AG checking account number and checking account routing number to cause \$225,034.52 to be transferred from T.H.'s checking account. The money was used by defendant RYAN to pay various bills or make various purchases on his own behalf, or on the behalf of others whom defendant RYAN designated.

In violation of Title 18, United States Code, Section 1344.

  
**ZANE DAVID MEMEGER**  
United States Attorney