

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA, )  
 ) **INFORMATION**  
Plaintiff, ) (18 U.S.C. § 1344)  
 )  
 )  
RONALD LEO SCHAEFFER, )  
 )  
Defendant. )

THE UNITED STATES ATTORNEY CHARGES:

**INTRODUCTION**

At times relevant to this Information:

1. Ronald Leo Schaeffer (hereinafter "Defendant") resided in the State of Minnesota.
2. Environmental Tillage Systems, Inc. ("ETS"), was an agricultural manufacturing company with offices located in Faribault, Minnesota.
3. ETS maintained a checking account at 1st United Bank, the deposits of which were insured by the Federal Deposit Insurance Corporation.

**COUNT 1**  
**(Bank Fraud)**

4. From in or about August 2008 and continuing until in or about April 2012, in the State and District of Minnesota and elsewhere, the Defendant,

**RONALD LEO SCHAEFFER,**

did knowingly and intentionally devise and execute a scheme to obtain money and funds under the custody and control of a financial institution by means of false and fraudulent pretenses and representations.

5. In or about January 2008, defendant was hired by Environmental Tillage Systems,

Inc. (hereafter "ETS") as its sole in-house accountant. Defendant remained in that position until in or about April 2012. Defendant received a salary from ETS that was directly deposited into his bank account and, when he incurred work-related expenses, received reimbursement checks from ETS.

6. As part of defendant's job responsibilities, defendant used Quickbooks accounting software to record information regarding payments owed by ETS to vendors and employees and generated ETS checks in order to pay such vendors and employees. Although defendant had the authority to use a signature stamp to validate the checks for a period of time, beginning in about November 2010, defendant was required to obtain the signature of either ETS's CEO or CFO on all ETS checks prior to releasing the checks to the payees.

7. Beginning in about August 2008 and continuing until about April 2012, defendant wrote approximately 127 false checks to himself from ETS's checking account in amounts ranging from approximately \$400 to \$12,000. Almost all of the checks were written from ETS's checking account at 1st United Bank.

8. As defendant knew, he was not entitled to receive any of the money paid to him through the false checks. Defendant had neither performed additional services nor incurred additional expenses that entitled him to receive the additional compensation from ETS reflected in the approximately 127 false checks.

9. Defendant, in order to disguise the checks on ETS's books, created false entries in ETS's Quickbooks accounting records that made it appear as if ETS had written the forged checks to legitimate ETS vendors.

10. Beginning in about November 2010 and continuing until about April 2012, because defendant did not have the authority to sign checks on behalf of ETS, defendant forged the signature of either ETS's CEO or CFO on the checks that he wrote to himself.

11. Defendant either cashed or deposited these checks into his bank account and thereby fraudulently obtained approximately \$432,504.10 from ETS. Defendant used the proceeds of the forged checks to, among other things, make payments on the defendant's home equity and auto loans, and build a lake house on property owned by the defendant located at 47960 Outback Lane, Elysian, Minnesota.

12. On or about December 7, 2011, in the State and District of Minnesota and elsewhere, the Defendant,

**RONALD LEO SCHAEFFER,**

for the purpose of executing the above-described scheme to obtain money and funds under the custody and control of a financial institution, did knowingly deposit a forged check in the amount of \$8,788.63 written on ETS's checking account at 1st United Bank into the defendant's bank account at Wells Fargo Bank.

13. All in violation of Title 18, United States Code, Section 1344.

**FORFEITURE ALLEGATIONS**

Count 1 of this Information is hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18 United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

As a result of the offenses alleged in Count 1 of this Information, the defendant **RONALD LEO SCHAEFFER**, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to a violation of Title 18, United States Code, Section 1344, including the real property located at 47960 Outback Lane, Elysian, Minnesota.

If any of the above-described property is unavailable for forfeiture as described in Title 21, United States Code, Section 853(p), the United States shall be entitled to forfeit substitute property as provided for by Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c), including the real property located at 47960 Outback Lane, Elysian, Minnesota.

Dated: November 27, 2012

B. TODD JONES  
United States Attorney



BY: Benjamin F. Langner  
Assistant U.S. Attorney  
Attorney ID No. IL-6277851