

UNITED STATES OF AMERICA : **CRIMINAL NO.** _____

v. : **DATE FILED:** _____

RODNELL GRIFFIN : **VIOLATIONS:**
18 U.S.C. § 1343 (wire fraud – 10 counts)
Notice of forfeiture

(Wire Fraud)

1. Defendant RODNELL GRIFFIN served as the executive director of a non-profit organization in Philadelphia (the NPO).
2. The NPO received income from contracts, grants and donations, and had bank accounts at various banks in Philadelphia. The NPO had a board of directors, to whom defendant RODNELL GRIFFIN reported.

3. From in or about January 2007 until in or about October 2013, in the Eastern District of Pennsylvania, and elsewhere, defendant

devised and intended to devise a scheme and artifice to defraud the NPO, and to obtain money and property by means of false and fraudulent pretenses, representations and promises.

It was part of the scheme that:

4. Defendant RODNELL GRIFFIN obtained automated teller machine cards (ATM cards) linked to certain of the NPO's bank accounts, and withdrew the NPO's cash for GRIFFIN's personal use.

5. At no time was defendant RODNELL GRIFFIN authorized to withdraw the NPO's money from its bank accounts with an ATM card; in fact, the NPO's board of directors did not know that any ATM cards existed until in or about October 2013.

6. Defendant RODNELL GRIFFIN made more than 500 cash withdrawals using ATM cards linked to the NPO's bank accounts at Wachovia Bank and Citizens Bank during the time period of the scheme, causing more than \$85,000 to be debited from the NPO's bank accounts. In addition, defendant GRIFFIN's use of the ATM cards also caused the NPO to incur more than \$5,300 in bank fees and charges.

7. Each time defendant RODNELL GRIFFIN used the ATM card linked to the NPO's Citizens Bank account, it caused wire communications between the automated teller machine that defendant GRIFFIN was using, and Citizens Bank in Rhode Island, which verified the PIN entered in the machine.

8. On or about the dates listed below, in the Eastern District of Pennsylvania and elsewhere, defendant

RODNELL GRIFFIN,

for the purpose of executing the scheme described above, and attempting to do so, caused to be transmitted by means of wire communication in interstate commerce the signals and sounds described above, in Paragraph 7, each transmission constituting a separate count:

COUNT	ON OR ABOUT DATE	DESCRIPTION
One	June 21, 2010	ATM cash transaction of \$203.99, originating from 3001 Street Road, Bensalem PA
Two	September 27, 2010	ATM cash transaction of \$204.00, originating from 1001 N. Delaware Avenue, Philadelphia PA
Three	January 26, 2011	ATM cash transaction of \$204.00, originating from Sugarhouse Casino, Philadelphia PA
Four	April 25, 2011	ATM cash transaction of \$403.99, originating from Parx Casino, Bensalem PA
Five	May 23, 2011	ATM cash transaction of \$303.99, originating from Parx Casino, Bensalem PA
Six	June 23, 2011	ATM cash transaction of \$204.00, originating from 1001 N. Delaware Avenue, Philadelphia PA
Seven	July 26, 2011	ATM cash transaction of \$304.00, originating from 1001 N. Delaware Avenue, Philadelphia PA
Eight	January 3, 2012	ATM cash transaction of \$404.00, originating from 1001 N. Delaware Avenue, Philadelphia PA
Nine	January 7, 2013	ATM cash transaction of \$204.00, originating from 1001 N. Delaware Avenue, Philadelphia PA
Ten	June 7, 2013	ATM cash transaction of \$204.00, originating from Sugarhouse Casino, Philadelphia PA

All in violation of Title 18, United States Code, Section 1343.

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

As a result of the violations of Title 18, United States Code, Section 1343 set forth in this Indictment, defendant

RODNELL GRIFFIN

shall forfeit to the United States all property, real or personal, involved in the commission of the offenses and all property traceable to such property.

1. The property to be forfeited includes, but is not limited to, a forfeiture money judgment in the amount of the proceeds of the violations alleged in Counts 1 through 10 of this indictment.

2. If any of the property subject to forfeiture, as a result of any act or omission of the defendant:

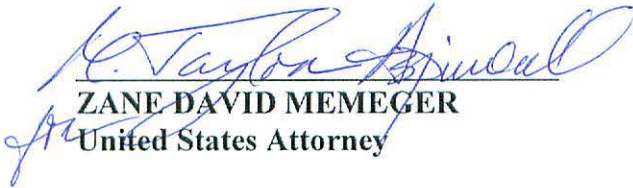
- a. cannot be located upon the exercise of the due diligence;
- b. has been transferred to or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot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

it is the intent of the United States, pursuant to Title 28, United States Code, Section 2461(c), 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 28, United States Code, Section 2461(c) and Title 18, United States Code, Section 981(a)(1)(C).

A TRUE BILL:

GRAND JURY FOREPERSON


ZANE DAVID MEMEGER
United States Attorney