

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	Criminal No. 20-10096 ADB
)	
v.)	Violation:
)	
ROBERT REPELLA,)	<u>Count One</u> : Conspiracy to Commit Mail
)	Fraud and Honest Services Mail Fraud
Defendant)	(18 U.S.C. § 1349)

INFORMATION

At all times relevant to this Information:

General Allegations

1. The defendant, ROBERT REPELLA (“REPELLA”), was a resident of Ambler, Pennsylvania.
2. Georgetown University (“Georgetown”) was a highly selective private university located in Washington, D.C.
3. Gordon Ernst (“Ernst”) was a resident of Chevy Chase, Maryland and Falmouth, Massachusetts. Until January 2018, Ernst was employed as the head coach of men’s and women’s tennis at Georgetown. As an employee of Georgetown, Ernst owed a duty of honest services to the university.

General Background on Athletic Recruitment and the College Admissions Process

4. The athletic teams of Georgetown compete in most sports at the Division I level, the highest level of intercollegiate athletics sanctioned by the National Collegiate Athletic Association (“NCAA”).
5. Georgetown, like many selective colleges and universities in the United States, recruits students with demonstrated athletic abilities, and applies different criteria when evaluating

applications from such students, with the expectation that recruited athletes will be contributing members of the university's athletic teams once enrolled. The admissions office at Georgetown allots a set number of admission slots to each head coach of a sport for that coach's recruited athletes. The admissions prospects of recruited athletes are substantially higher than those of non-recruited athletes with similar grades and standardized test scores.

The Conspiracy

6. From in or about 2017 through in or about 2018, the defendant, ROBERT REPELLA agreed to bribe Ernst to designate REPELLA's daughter as a recruit to the Georgetown women's tennis team, thereby facilitating her admission to Georgetown, in violation of the duty of honest services Ernst owed to Georgetown as his employer.

Object and Purpose of the Conspiracy

7. The principal object of the conspiracy was to commit mail fraud and honest services mail fraud, in violation of Title 18, United States Code, Sections 1341 and 1346, by bribing Ernst to designate REPELLA's daughter as a tennis recruit. The principal purpose of the conspiracy was to facilitate the admission of REPELLA's daughter to Georgetown.

Manner and Means of the Conspiracy

8. Among the manner and means by which REPELLA and Ernst carried out the conspiracy were the following:

- a. Paying bribes to Ernst; and
- b. Designating REPELLA's daughter as a tennis recruit.

Acts in Furtherance of the Conspiracy

9. On various dates between in or about 2017 and in or about 2018, REPELLA and Ernst committed and caused to be committed the following acts, among others, in furtherance of the conspiracy:

10. In or about the summer of 2017, REPELLA agreed to pay Ernst a bribe in exchange for Ernst designating REPELLA's daughter as a recruit to the Georgetown tennis team.

11. On or about August 31, 2017, REPELLA paid Ernst \$25,000 by check.

12. On or about September 16, 2017, REPELLA paid Ernst an additional \$25,000 by check.

13. On or about November 15, 2017, Ernst sent an email to a Georgetown admissions officer listing REPELLA's daughter as one of "[his] recruits so far" and requesting that "likely letters" be sent to his designated recruits, including REPELLA's daughter.

14. On or about February 28, 2018, as a result of Ernst's email, Georgetown sent REPELLA's daughter a letter by United States mail noting that the Committee on Admissions had conducted an initial review of her application to the Class of 2022 and had rated her admission as "likely." The letter explained that candidates rated "likely" have a greater than 95 percent chance of being admitted to Georgetown and that REPELLA's daughter would receive a final decision by April 1, 2018.

15. Shortly thereafter, as a result of Ernst's actions, REPELLA's daughter was formally admitted to Georgetown.

COUNT ONE

Conspiracy to Commit Mail Fraud and Honest Services Mail Fraud
(18 U.S.C. § 1349)

The United States Attorney charges:

16. The United States Attorney re-alleges and incorporates by reference paragraphs 1-15 of this Information.

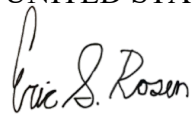
17. From in or about 2017 through in or about 2018, in the District of Massachusetts and elsewhere, the defendant,

ROBERT REPELLA,

conspired with others known to the United States Attorney to commit mail fraud and honest services mail fraud, that is, having devised and intending to devise a scheme and artifice to defraud and to obtain money and property, to wit, admission to Georgetown, by means of materially false and fraudulent pretenses, representations, and promises, and to defraud and deprive Georgetown of its right to the honest and faithful services of its employee, Gordon Ernst, through bribes and kickbacks, did, for the purpose of executing and attempting to execute the scheme, knowingly cause to be delivered by mail and by any private and interstate commercial carrier according to the direction thereon any matter and thing, in violation of Title 18, United States Code, Sections 1341 and 1346.

All in violation of Title 18, United States Code, Section 1349.

ANDREW E. LELLING
UNITED STATES ATTORNEY

By: 

ERIC S. ROSEN
JUSTIN D. O'CONNELL
KRISTEN A. KEARNEY
LESLIE A. WRIGHT
Assistant United States Attorneys

Date: May 20, 2020