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) INFORMATION

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CASE NO.

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Title 18, United States Code,
Sections 1343 and 1001(a)(2).

JUDGE POLSTER

GENERAL ALLEGATIONS

2. Amer-I-Can was a non-profit organization located in Shaker Heights, Ohio, and registered with the Ohio Secretary of State on or about December 2, 2008. Amer-I-Can received tax exempt status from the Internal Revenue Service (“IRS”) as a public charity under section

501(c)(3) of the Internal Revenue Code on or about December 30, 2008. Amer-I-Can's mission was to teach a proprietary curriculum of life-management skills developed by the Amer-I-Can Foundation, a separate non-profit organization headquartered in Los Angeles, California, and founded by a former professional football player ("Associate 1").

3. As Executive Director of Amer-I-Can, RUCKER was responsible for the operations of the charitable organization. RUCKER applied for grants from foundations, solicited donations from individuals and corporations, controlled Amer-I-Can's bank accounts, and managed its finances.

4. An IRS Form 990 was a federal tax return that non-profit organizations were required to file annually. An IRS Form 990 publically disclosed the total compensation paid to officers, directors, employees, and contractors of a non-profit organization during that calendar year. An IRS Form 990 also publically disclosed details about a non-profit organization's governance, management structure, and policies, including the number and independence of its board of directors. RUCKER filed and caused to be filed IRS Forms 990 for Amer-I-Can for 2011, 2012, and 2013, declaring that he examined each return and that it was true, correct, and complete under penalties of perjury.

5. CPA was a project funded by charitable donors to support the coordinated efforts of certain non-profit organizations, including Amer-I-Can, to reduce violence in Cleveland, Ohio. CPA's constituent organizations employed "outreach workers" who attempted to resolve conflicts in the Cleveland area. CPA itself had neither tax exempt status nor its own bank account. Instead, RUCKER solicited charitable funds from foundations and individuals to support CPA's operations and deposited donations he received in the Amer-I-Can bank account.

6. As President of CPA, RUCKER represented the project in public and agreed "to guide [CPA] with best practices at all times."

COUNT 1
Wire Fraud, 18 U.S.C. § 1343

7. The allegations in paragraphs 1 through 6 of this Information are re-alleged and incorporated by reference in this count, as though fully restated herein.

RUCKER's Scheme to Defraud Charitable Donors

8. From on or about August 19, 2010, through February 11, 2015, Defendant REGINALD J. RUCKER, aka REGGIE RUCKER, devised and intended to devise a scheme and artifice to defraud charitable donors to Amer-I-Can and CPA, and to obtain money and property by means of materially false and fraudulent pretenses, representations and promises. RUCKER misrepresented to donors that their donations would be used for charitable purposes in support of the mission of Amer-I-Can and CPA when, in fact, RUCKER intended to divert and did divert donor funds for his and his designees' use, and intended to pay and did pay his personal expenses using the Amer-I-Can bank account containing donor funds. RUCKER diverted charitable funds in excess of the compensation he was entitled to receive from Amer-I-Can and CPA.

It was part of the scheme that:

9. RUCKER used his status as a former professional football player for the Cleveland Browns, and his relationship with Associate 1, a prominent former athlete, to induce potential donors to make charitable contributions to Amer-I-Can and CPA.

10. RUCKER presented himself as an experienced non-profit manager responsible for raising millions of dollars for various charitable causes.

11. RUCKER falsely represented to donors and to the IRS that Amer-I-Can had an independent Board of Directors that provided oversight and determined employee salaries, including his own, when in fact Amer-I-Can did not have a Board of Directors.

12. RUCKER made false and misleading statements, and material omissions to actual and prospective donors to Amer-I-Can and CPA about his use of charitable funds and his lack of compensation, including “I do not have a salary with Amer-I-Can” and “We don’t have any contracts that pay me . . .”

13. RUCKER commingled personal funds and charitable funds in the Amer-I-Can bank account, PNC Bank Account No. xxxx6732 (“Amer-I-Can Bank Account”).

14. RUCKER wrote checks to himself and made withdrawals from the Amer-I-Can Bank Account in amounts and at frequencies unrelated to work he performed, but rather dictated by his own personal financial needs.

15. RUCKER used charitable funds to pay for personal expenses, including but not limited to RUCKER’s mortgage payments, entertainment, meals, travel, groceries, and dry cleaning.

16. RUCKER made cash withdrawals at casinos from the Amer-I-Can Bank Account. From 2011 to 2015, RUCKER withdrew approximately \$48,053.54 from the Amer-I-Can Bank Account at casinos located in Tampa, Florida (“Florida Casino”); Las Vegas, Nevada (“Las Vegas Casino”); and Cleveland, Ohio (“Cleveland Casino”).

17. RUCKER paid multiple gambling debts totaling approximately \$65,000 that he incurred from 2012 through 2014 at the Las Vegas Casino using money that was donated to Amer-I-Can and CPA for charitable purposes.

18. RUCKER made cash withdrawals from the Amer-I-Can Bank Account at various Automatic Teller Machines (“ATMs”), including at shopping centers in Northeast Ohio.

19. RUCKER had sole access to the Amer-I-Can Bank Account and its debit card, which prevented oversight of his withdrawals and personal use of funds donated to Amer-I-Can and CPA for charitable purposes.

20. RUCKER incurred overdraft fees and ATM fees using the Amer-I-Can Bank Account and paid for them with funds donated to Amer-I-Can and CPA for charitable purposes.

21. RUCKER falsely represented to actual and prospective donors that RUCKER, as President of CPA, would follow ethical standards and lead the organization with best practices at all times.

22. RUCKER knew the limitations imposed by donors on his use of their charitable funds. RUCKER required adherence to the terms of grant agreements by other members of CPA, all while RUCKER engaged in conduct that violated the terms of Amer-I-Can's grant agreements. During the scheme to defraud, RUCKER threatened to file criminal charges against another CPA member accused of misappropriating and commingling charitable funds.

23. RUCKER represented on Amer-I-Can's IRS Forms 990, under penalties of perjury, that his total compensation was less than the net amount he actually removed each year from the Amer-I-Can Bank Account.

24. RUCKER deposited funds, including gambling proceeds, money borrowed from family and associates, and money characterized as his personal "loans" to Amer-I-Can, into the Amer-I-Can Bank Account. RUCKER made such deposits often after he had depleted the Amer-I-Can Bank Account to the point that it had insufficient funds to pay its outreach workers the wages they earned, which delayed discovery of RUCKER's misuse of donors' funds. Despite these deposits, as set forth below, RUCKER withdrew money from the Amer-I-Can Bank Account in excess of the compensation that he reported to the government and the public on Amer-I-Can's Forms 990, and that he reported on his personal income tax returns.

25. In 2011, RUCKER withdrew a net amount of approximately \$122,598.91 from the Amer-I-Can Bank Account, but reported receiving only \$4,500 in total compensation from Amer-I-Can on its 2011 IRS Form 990.

26. In 2012, RUCKER withdrew a net amount of approximately \$114,669.68 from the Amer-I-Can Bank Account, but reported receiving only \$45,000 in total compensation from Amer-I-Can on its 2012 IRS Form 990.

27. In 2013, RUCKER withdrew a net amount of approximately \$83,548.72 from the Amer-I-Can Bank Account, but reported receiving only \$45,000 in total compensation from Amer-I-Can on its 2013 IRS Form 990.

28. In 2014, a year for which Amer-I-Can did not file an IRS Form 990, RUCKER withdrew a net amount of approximately \$132,547.49 from the Amer-I-Can Bank Account, including approximately \$35,384.63 at casino ATMs.

29. Between on or about January 1, 2015 and February 11, 2015 – the date the Federal Bureau of Investigation (“FBI”) interviewed RUCKER about his misappropriation of Amer-I-Can’s funds – RUCKER withdrew a net amount of approximately \$32,887.95 from the Amer-I-Can Bank Account, including approximately \$3,324.95 at casino ATMs.

30. RUCKER did not disclose to actual and prospective donors that he engaged in any of the conduct set forth in paragraphs 5-29 when he solicited and received donations intended for Amer-I-Can’s and CPA’s charitable purposes.

Foundation 1 (2011)

31. Foundation 1 was a community foundation whose mission was to enhance the lives of Cleveland residents (“Foundation 1”). Amer-I-Can used a “fiscal agent,” an established non-profit organization that received a fee to facilitate the Foundation 1 grant to Amer-I-Can and the other CPA member organizations.

32. RUCKER applied for grants from Foundation 1 to support Amer-I-Can and CPA, and Foundation 1 awarded grants of approximately \$400,000 in 2011; \$600,000 in 2012; \$600,000 in 2013; \$450,000 in 2014; and \$400,000 in 2015. Foundation 1 required Amer-I-Can

and CPA to secure funding from additional sources as a condition of receiving its funds, but Foundation 1's donations constituted the vast majority of funds that Amer-I-Can and CPA received to support their activities.

33. RUCKER solicited and accepted money from Foundation 1 knowing that its funds could only be spent in accordance with the terms and conditions of the grant approved by Foundation 1; that any request to modify the grant must be submitted in writing and approved in advance by Foundation 1; and that any funds not expended for the purpose of the grant must be returned to Foundation 1.

34. RUCKER repeatedly cited CPA outreach workers' lack of pay to justify his requests for additional funds from Foundation 1. For example, on or about August 19, 2010, RUCKER told his primary contact at Foundation 1 ("Foundation 1 Employee") that CPA outreach workers complained about "the lack of pay for the work that they do. They believe they are being disrespected and taken advantage of . . . I can't hold them together much longer. We have come too far, put too much into this . . . None of us has money! . . . We have very little time . . . I am afraid the Alliance will dissolve. Short term, I need 50,000 dollars to stabilize [sic] our organization . . ."

35. On or about October 8, 2010, RUCKER applied to Foundation 1 for a grant to fund CPA in 2011. RUCKER stated the total budget for CPA in 2012 was \$1,568,644.80.

36. RUCKER stated he had "managed fundraising for Amer-I-Can in Florida and Ohio since 2006 . . . and is an advisor to [Associate 1]." RUCKER stated he was "responsible for raising" over \$4,000,000 for various charitable causes. RUCKER also stated that Associate 1 was the Chair of the Amer-I-Can Cleveland Board of Directors, then knowing that Amer-I-Can did not have a board of directors.

37. On or about December 21, 2010, Foundation 1 awarded \$400,000 to fund CPA from January 1, 2011, through December 31, 2011.

38. On or about December 21, 2010, Foundation 1 Employee emailed RUCKER and stated, "Congratulations, the [Foundation 1] Board awarded the Peacemaker's Alliance . . . \$400,000 to fund 24 outreach workers to begin January 1st . . . This was a labor of love! I am so proud of each and everyone one [sic] of you who participated in making this a reality . . . Now its [sic] time for the world to see what you do!" RUCKER responded, "Bless God! Thank you . . . for standing with us and believing in us."

39. On or about March 1, 2011, Amer-I-Can received approximately \$43,950 of Foundation 1's charitable funds.

40. Before and after receiving the donation, RUCKER withdrew funds from the Amer-I-Can Bank Account on or about the dates and in the approximate amounts listed below:

Date	Transaction	Amount
2/7/2011	Check to RUCKER	\$4,000.00
2/22/2011	Check to RUCKER	\$2,000.00
2/25/2011	Check to RUCKER	\$10,000.00
4/6/2011	Check made out to "CASH"	\$2,000.00
4/7/2011	ATM Withdrawal: Florida Casino ¹	\$1,004.00
4/7/2011	ATM Withdrawal: Florida Casino	\$1,004.00
5/11/2011	Check to RUCKER	\$2,000.00
5/24/2011	Check to RUCKER	\$5,000.00
5/24/2011	Check made out to "CASH"	\$2,000.00
5/26/2011	ATM Withdrawal: Florida Casino	\$1,004.00
6/10/2011	ATM Withdrawal: Cleveland, OH	\$60.00
6/30/2011	ATM Withdrawal: Beachwood, OH	\$300.00

41. On or about July 22, 2011, Amer-I-Can received approximately \$43,950 of Foundation 1's charitable funds.

¹ RUCKER's Florida Casino ATM withdrawals included a \$4.00 transaction fee.

42. After receiving the donation, RUCKER withdrew funds from the Amer-I-Can Bank Account on or about the dates and in the approximate amounts listed below:

Date	Transaction	Amount
7/25/2011	Check to RUCKER	\$3,500.00
7/29/2011	Check to RUCKER	\$3,000.00
8/3/2011	Debit Card: Grocery Store, Warrensville Heights, OH	\$40.28
8/22/2011	Check to RUCKER	\$20,000.00
8/26/2011	Check to RUCKER	\$2,000.00
8/29/2011	Debit Card: Private Golf Course, Highland Heights, OH	\$74.81
9/12/2011	Debit Card: Home Furnishing Store, Beachwood, OH	\$86.19
11/17/2011	Check to RUCKER	\$5,000.00
12/7/2011	Check to RUCKER	\$2,000.00
12/12/2011	ATM Withdrawal: Cleveland, OH	\$300.00
12/19/2011	Check to RUCKER	\$3,000.00
12/20/2011	Check to RUCKER	\$2,000.00
12/21/2011	Check to RUCKER	\$1,000.00
12/27/2011	Check to RUCKER	\$3,000.00
12/27/2011	ATM Withdrawal: Las Vegas Casino ²	\$1,004.99

CEO-1 (2011)

43. On or before December 28, 2011, RUCKER solicited a contribution from the CEO ("CEO-1") of a retail pyrotechnic company ("Pyrotechnic Company"), ostensibly to support the operations of Amer-I-Can and CPA. RUCKER did not disclose his personal use of the Amer-I-Can Bank Account and his diversion of charitable funds.

44. On or about December 28, 2011, Amer-I-Can received a \$3,200 donation from the Pyrotechnic Company.

45. On or about December 30, 2011, RUCKER wrote himself a check for \$2,000 from the Amer-I-Can Bank Account.

² RUCKER's Las Vegas Casino ATM withdrawals included a \$4.99 transaction fee.

Foundation 1 (2012)

46. On or about November 2, 2011, RUCKER applied to Foundation 1 for a grant to fund CPA in 2012. RUCKER stated the total budget for CPA in 2012 was \$1,568,644.80. RUCKER did not disclose his personal use of the Amer-I-Can Bank Account and his diversion of charitable funds.

47. On or about December 21, 2011, Foundation 1 awarded \$600,000 to fund CPA from January 1, 2012, through December 31, 2012.

48. On or about January 20, 2012, RUCKER wrote himself a check for \$3,000 from the Amer-I-Can Bank Account, reducing the balance to approximately \$443.05.

49. On or about January 30, 2012, Amer-I-Can received \$169,200 of Foundation 1's charitable funds.

50. After receiving the donation, RUCKER withdrew funds from the Amer-I-Can Bank Account on or about the dates and in the approximate amounts listed below:

Date	Transaction	Amount
2/1/2012	Check to RUCKER	\$6,000.00
2/3/2012	Check to RUCKER	\$7,000.00
2/6/2012	Check to RUCKER	\$25,000.00
3/6/2012	Check to RUCKER	\$2,000.00
5/15/2012	Check to RUCKER	\$3,000.00

51. Between on or about February 15, 2012, and May 15, 2012, RUCKER also received approximately eight direct deposits into his personal checking account at Chase Bank, account number xxxx1042 ("Personal Chase Account"), of between \$1,885.17 and \$2,241.03, each from the Amer-I-Can payroll bank account, totaling approximately \$17,572.33.

52. On or about May 17, 2012, Amer-I-Can received approximately \$168,606.15 of Foundation 1's charitable funds.

53. After receiving the donation, RUCKER withdrew funds from the Amer-I-Can Bank Account on or about the dates and in the approximate amounts listed below:

Date	Transaction	Amount
5/18/2012	Check to RUCKER	\$3,000.00
5/31/2012	Check to RUCKER	\$5,000.00
6/1/2012	Check to RUCKER	\$20,000.00
7/6/2012	ATM Withdrawal: Cleveland Casino ³	\$1,004.99
7/9/2012	Check to RUCKER	\$4,000.00
8/2/2012	Check to RUCKER	\$5,000.00
8/10/2012	Withdrawal: Bank Teller	\$5,000.00
8/14/2012	Check to RUCKER	\$2,000.00
8/14/2012	Check to RUCKER	\$1,000.00
10/11/2012	ATM Withdrawal: Florida Casino	\$1,004.00
10/12/2012	ATM Withdrawal: Florida Casino	\$1,004.00
11/1/2012	ATM Withdrawal: Shopping Center, Cleveland OH	\$300.00

54. Between on or about May 31, 2012, and September 28, 2012, RUCKER also received approximately nine direct deposits of \$1,601.09 into his Personal Chase Account, each from the Amer-I-Can payroll bank account, totaling approximately \$14,409.81.

55. On or about October 8, 2012, RUCKER submitted an Interim Report to Foundation 1 and did not disclose his personal use of Foundation 1's donated funds. Instead, RUCKER stated "we have had some challenges with limited staffing and our capacity to meet the needs of this growing population . . . The most challenging aspects of this project have been our ability to reach our goals and set outcomes with a part time staff."

56. On or about November 5, 2012, RUCKER emailed Foundation 1 Employee about his efforts to solicit letters of support for CPA to strengthen its 2013 funding request and stated, "know that I am attacking this like I would if I were getting ready to catch the game winning touchdown . . . to me, that's a huge compliment!!" RUCKER never disclosed his personal use of

³ RUCKER's Cleveland Casino ATM withdrawals included a \$4.99 transaction fee.

Foundation 1's donated funds to Foundation 1 Employee, who was responsible for managing its grant to Amer-I-Can and CPA.

CEO-2 (2012)

57. On or about June 11, 2012, RUCKER solicited a contribution from the CEO ("CEO-2") of a not-for-profit trade association representing hospitals in Northeast Ohio ("Hospital Trade Association"), ostensibly to support the operations of Amer-I-Can and CPA. RUCKER did not disclose his personal use of the Amer-I-Can Bank Account and his diversion of charitable funds. CEO-2 did not donate funds to Amer-I-Can at this time.

58. On or about October 23, 2012, RUCKER again solicited a contribution from CEO-2, and stated, "I am appealing to you once again for support because we need help. I would like to ask you to consider a grant of 20,000 dollars to help us get to 2013 and new funding from [Foundation 1] . . . I will not ask for any additional dollars next year, this would be a one time request!"

59. On or about October 25, 2012, CEO-2 told RUCKER, "I can get you a check next week. I need a request from you on the organizations [sic] letterhead and any material you might have describing the organization and its mission . . . Glad we could help a little. This is important stuff you're working on."

60. On or about October 25, 2012, RUCKER sent CEO-2 a letter stating that CPA was "funded by a 600,000 dollar challenge grant from [Foundation 1] . . . We are in desperate need of additional funding to complete our mission and our commitment to the good citizens of Cleveland. Therefore, we respectfully request funding from the [Hospital Trade Association] for 20,000 dollars." RUCKER stated, "This money will enable us to complete the year without compromising in any way the work that we are doing."

61. On or about November 2, 2012, Amer-I-Can received a \$20,000 donation from the Hospital Trade Association.

62. After receiving the donation, RUCKER withdrew funds from the Amer-I-Can Bank Account on or about the dates and in the approximate amounts listed below:

Date	Transaction	Amount
11/7/2012	Check to RUCKER	\$5,000.00
11/9/2012	ATM Withdrawal: Shopping Center, Woodmere, OH	\$200.00
11/13/2012	Debit Card: Seafood Restaurant, Cleveland, OH	\$50.46
11/14/2012	Check to RUCKER	\$2,000.00
11/15/2012	ATM Withdrawal: Shopping Center, North Randall, OH	\$600.00
11/19/2012	ATM Withdrawal: Airport, Cleveland, OH, before RUCKER travelled to Las Vegas, NV	\$603.50

Associate 2 (2012)

63. On or about September 26, 2012, RUCKER solicited a contribution from an associate ("Associate 2"), ostensibly to support the operations of Amer-I-Can and CPA. RUCKER stated, "I will only do this once to my friends, however, we have some shortfalls because of what I have tried to do with these at risk youth and the number of people I have tried to keep working. We will address this with [Foundation 1] in our next round of funding. Whatever is possible, I will certainly appreciate!" RUCKER did not disclose his personal use of the Amer-I-Can Bank Account and his diversion of charitable funds.

64. On or about November 5, 2012, Amer-I-Can received a \$5,000 donation from Associate 2.

65. On or about November 9, 2012, RUCKER wrote himself a check for \$1,000 from the Amer-I-Can Bank Account.

Associate 3 (2012)

66. On or about September 7, 2012, RUCKER solicited a contribution from an associate ("Associate 3"), ostensibly to support the operations of Amer-I-Can and CPA. RUCKER did not disclose his personal use of the Amer-I-Can Bank Account and his diversion of charitable funds.

67. On or about October 15, 2012, Amer-I-Can received a \$1,000 donation from Associate 3.

68. On or about October 15, 2012, RUCKER withdrew approximately \$600 from an ATM at a shopping center in Cleveland, Ohio.

Associate 4 (2012)

69. On or about October 16, 2012, RUCKER solicited a contribution from an associate ("Associate 4"), ostensibly to support the operations of Amer-I-Can and CPA. RUCKER stated, "You know me and you know what I do and I don't ask for help unless I need it . . ." RUCKER did not disclose his personal use of the Amer-I-Can Bank Account and his diversion of charitable funds.

70. On or about October 29, 2012, Amer-I-Can received a \$1,000 donation from Associate 4, bringing the balance in the Amer-I-Can Bank Account to approximately \$2,181.17.

71. Between on or about October 31, 2012, and November 1, 2012, RUCKER wrote himself a check for \$600, and another check for \$500.

Non-Profit 1 (2012-13)

72. On or about January 24, 2012, RUCKER solicited a \$10,000 contribution from an organization that made grants to non-profit organizations in and around Cleveland, Ohio ("Non-Profit 1") to fund a program named "Amer-I-Can Foundation-Cleveland Metropolitan School

District Project.” RUCKER did not disclose his personal use of the Amer-I-Can Bank Account and his diversion of charitable funds.

73. On or about June 11, 2012, Non-Profit 1 awarded a \$7,500 grant to Amer-I-Can, to be paid in four disbursements of \$1,875 each. RUCKER submitted a revised budget totaling \$7,500, and stated that the funds would cover specific amounts for “Rent,” “Utilities,” “Telephone,” “Equipment,” “Office Supplies” and “Postage.” RUCKER did not indicate that any of Non-Profit 1’s grant was for his salary and wages.

74. RUCKER signed Non-Profit 1’s grant agreement and certified “that such grant will still be used for the purpose(s) described” in the grant proposal.

75. On or about November 1, 2012, Amer-I-Can received a disbursement of \$1,875 from Non-Profit 1, bringing the balance in the Amer-I-Can Bank Account to approximately \$2,469.29.

76. On or about November 2, 2012, RUCKER wrote himself a check for \$2,000 from the Amer-I-Can Bank Account.

77. On or about April 26, 2013, Amer-I-Can received another donation of \$1,875 from Non-Profit 1 into the Amer-I-Can Bank Account. Before the donation, the Amer-I-Can Bank Account was overdrawn by approximately \$22.13.

78. Between on or about April 29, 2013, and April 30, 2013, RUCKER withdrew \$200 from an ATM at a shopping center in North Randall, Ohio; wrote himself a check for \$100 from the Amer-I-Can Bank Account; and withdrew \$100 from an ATM at a shopping center in Woodmere, Ohio.

Associate 5 (2012-13)

79. On or about November 27, 2012, RUCKER solicited a contribution from an associate (“Associate 5”) and his employer, ostensibly to support the operations of Amer-I-Can

and CPA. RUCKER asked Associate 5 for "a cash donation . . . Your generosity will make a difference in our community by allowing us to continue our work." RUCKER did not disclose his personal use of the Amer-I-Can Bank Account and his diversion of charitable funds.

80. On or about January 28, 2013, Amer-I-Can received a donation from Associate 5's employer for \$1,000.

81. On or about January 30, 2013, RUCKER wrote himself a check for \$1,000 from the Amer-I-Can Bank Account.

First Payment of Las Vegas Casino Gambling Debt with Amer-I-Can Funds (2012-13)

82. On or about November 8, 2012, RUCKER applied to Foundation 1 for a grant to fund CPA in 2013. RUCKER stated the total budget for CPA in 2013 was \$1,568,644.80. RUCKER did not disclose his personal use of the Amer-I-Can Bank Account and his diversion of charitable funds.

83. In or around December 2012, RUCKER incurred a \$20,000 debt at the Las Vegas Casino.

84. On or about January 17, 2013, after Foundation 1 did not approve RUCKER's initial 2013 grant application, RUCKER re-applied to Foundation 1 for \$150,000 in "bridge funding" to fund CPA's operations from January through April of 2013. RUCKER again failed to disclose his personal use of the Amer-I-Can Bank Account and his diversion of charitable funds.

85. On or about the same date, the Foundation 1 Employee recommended that Foundation 1 approve the bridge funding requested by RUCKER and stated it "will allow the 16 outreach workers and 3 case managers to be called upon by the City's Community Relations Board who will identify hotspots and dispatch the outreach workers. CPA will be further reviewed for additional funding in March 2013."

86. On or about January 29, 2013, Foundation 1 Employee emailed RUCKER and informed him that "The Board [of Foundation 1] has awarded \$150,000 . . . for Peacemakers Alliance. Congrats!!!!"

87. On or about January 30, 2013, RUCKER forwarded the Foundation 1 email to the Las Vegas Casino. RUCKER stated, "this is my non profit [sic] and they were a little behind getting me my money. I will not actually have this in my hands for 10 days, maybe 14 . . . I like to keep communication open so that I don't get into any trouble. Can they work with me on this?"

88. On or about January 30, 2013, the Las Vegas Casino responded, "I will call the credit department tomorrow and let them know you will send payment on 2/15." The balance in RUCKER's Personal Chase Account was \$376.76, and the balance in the Amer-I-Can Bank Account was \$4,549.65, after RUCKER wrote himself a check the same day for \$1,000.

89. On or about February 14, 2013, RUCKER emailed the Las Vegas Casino a letter from Foundation 1 that stated it would disburse the \$150,000 bridge funding for CPA on or about February 28, 2013.

90. RUCKER stated, "as you can see from this correspondence, [Foundation 1] threw me a curve! I won't have this money in my hands until March 2 or 3rd . . . These things sometimes get delayed like this because of the amount of money, which this is only a portion of the final award in April."

91. On or about February 19, 2013, RUCKER wrote himself a check for \$2,000 from the Amer-I-Can Bank Account.

92. On or about February 21, 2013, Amer-I-Can received \$5,000 of charitable funds from Foundation 1. Before the deposit, the balance in the Amer-I-Can Bank Account was approximately \$1,698.33.

93. On or about February 25, 2013, RUCKER wrote himself a check for \$3,000 from the Amer-I-Can Bank Account.

94. On or about February 27, 2013, RUCKER wrote himself a check for \$3,500 from the Amer-I-Can Bank Account. RUCKER also made multiple purchases using the Amer-I-Can debit card, including: \$70.26 at a Japanese steakhouse in Orange Village, Ohio; \$28.90 at a tavern in Solon, Ohio; \$25.39 at a dry cleaner in Woodmere, Ohio; and on or about February 28, 2013, \$119 at a grocery store in Lyndhurst, Ohio, reducing its balance to approximately \$116.67.

95. On or about February 27, 2013, the balance in RUCKER's Personal Chase Account balance was approximately \$5.04.

96. On or about February 28, 2013, the Foundation 1 Employee sent an email to RUCKER and others about the 2013 bridge funding and stated, "The goal was to not have the program interrupted because of funding . . . as the guys haven't been paid since December." The same day, RUCKER deposited \$2,500 in cash into his Personal Chase Account.

97. On or about March 5, 2013, Amer-I-Can received \$58,751.52 of Foundation 1's charitable funds.

98. On or about March 6, 2013, RUCKER wrote himself a check for \$4,000 from the Amer-I-Can Bank Account and deposited it into his Personal Chase Account.

99. On or about March 12, 2013, RUCKER wrote a check for \$20,000, funded in part by money from Amer-I-Can, from his Personal Chase Account to the Las Vegas Casino to pay his December 2012 gambling debt.

Foundation 1 (2013)

100. On or about February 15, 2013, RUCKER applied to Foundation 1 for a grant to fund CPA for the remainder of 2013. RUCKER stated the total budget for CPA in 2013 was \$1,568,644.80. RUCKER stated in the grant application that he would only be employed and

compensated at a “part-time” level in 2013. RUCKER did not disclose his personal use of the Amer-I-Can Bank Account and his diversion of charitable funds.

101. On or about March 29, 2013, Foundation 1 awarded \$450,000 to fund CPA from April 1, 2013, through December 31, 2013.

102. On or about April 2, 2013, Amer-I-Can received \$27,221 of Foundation 1’s charitable funds.

103. On or about April 3, 2013, RUCKER wrote himself a check for \$6,000 and another check for \$3,000, from the Amer-I-Can Bank Account.

104. On or about May 2, 2013, Amer-I-Can received another disbursement of \$145,000 from Foundation 1.

105. After receiving the donation, RUCKER withdrew funds from the Amer-I-Can Bank Account on or about the dates and in the approximate amounts listed below:

Date	Transaction	Amount
5/6/2013	Check to RUCKER	\$15,500.00
5/6/2013	Check to RUCKER	\$2,000.00
5/9/2013	Check to RUCKER	\$5,000.00
5/10/2013	Check to RUCKER	\$10,000.00
5/10/2013	ATM Withdrawal: Cleveland Casino	\$1,004.99
5/24/2013	Check to RUCKER	\$5,000.00
5/24/2013	Withdrawal: Bank Teller	\$5,000.00
5/30/2013	Check to RUCKER	\$5,000.00
5/30/2013	Withdrawal: Bank Teller	\$5,000.00
6/6/2013	Check to RUCKER	\$6,000.00
6/6/2013	ATM Withdrawal: Shopping Center, North Randall, OH	\$500.00
6/14/2013	Check to RUCKER	\$2,000.00
6/18/2013	Check to RUCKER	\$3,500.00
6/18/2013	Withdrawal: Bank Teller	\$5,000.00
6/24/2013	ATM Withdrawal: Shopping Center, Lyndhurst, OH	\$303.50
6/26/2013	ATM Withdrawal: Grocery Store, Lyndhurst, OH	\$118.00
6/28/2013	Debit Card: Tavern, Solon, OH	\$40.67

106. On or about July 31, 2013, Amer-I-Can received \$145,000 of Foundation 1's charitable funds. Before the donation, the balance in the Amer-I-Can Bank Account was approximately \$3,161.14.

107. After receiving the donation, RUCKER withdrew funds from the Amer-I-Can Bank Account on or about the dates and in the approximate amounts listed below:

Date	Transaction	Amount
7/31/2013	Check to RUCKER	\$4,000.00
8/1/2013	Check to RUCKER	\$500.00
8/2/2013	Check to RUCKER	\$18,000.00
8/6/2013	Check to RUCKER	\$10,000.00
8/15/2013	Check to RUCKER	\$5,000.00
8/15/2013	Check to RUCKER	\$2,000.00
8/15/2013	ATM Withdrawal: Shopping Center, Cleveland, OH	\$600.00
8/30/2013	Check to RUCKER	\$5,000.00
9/6/2013	Check to RUCKER	\$5,000.00
9/11/2013	Check to RUCKER	\$10,000.00
9/12/2013	Debit Card: Seafood Restaurant, Woodmere, OH	\$103.69
11/7/2013	Check to RUCKER	\$4,500.00
11/7/2013	Check to RUCKER	\$500.00
11/12/2013	ATM Withdrawal: Cleveland Casino	\$304.99

Non-Profit 1 (2013)

108. On or about January 10, 2013, RUCKER solicited another contribution from Non-Profit 1, this time for \$20,000. Specifically, RUCKER proposed that Non-Profit 1 fund a partnership with another non-profit organization involved with CPA ("Non-Profit 2") to provide services to "female at risk populations." RUCKER did not disclose his personal use of the Amer-I-Can Bank Account and his diversion of charitable funds.

109. On or about June 16, 2013, Non-Profit 1 awarded a \$5,000 grant to Amer-I-Can, to be paid in two disbursements of \$2,500 each. RUCKER submitted a revised budget for the "female at risk populations" project that totaled \$5,000 for "Office Assistant/CPA," "Office

Supplies,” “Equipment,” and “Consultants.” RUCKER did not disclose that any of Non-Profit 1’s grant was for his compensation.

110. RUCKER again signed Non-Profit 1’s grant agreement and certified “that such grant will still be used for the purpose(s) described” in the grant application.

111. On or about November 26, 2013, Amer-I-Can received a disbursement of \$2,500 from Non-Profit 1.

112. On or about November 27, 2013, RUCKER wrote himself a check for \$1,000 from the Amer-I-Can Bank Account.

Cuyahoga County Prosecutor: “Drug Money” and “Confiscated Assets” (2013)

113. On or about January 31, 2013, RUCKER emailed the Cuyahoga County Prosecutor and stated, “The Cleveland Peacemakers Alliance is in need of financial support . . . Somehow, we have not been able to garner the financial support of the larger Cleveland community . . . As President of the Peacemakers Alliance I am asking you to consider using drug money or confiscated assets to complement our budget needs. I can’t think of a better way to help the children!” RUCKER did not disclose his personal use of the Amer-I-Can Bank Account and his diversion of charitable funds.

Cleveland Browns: RUCKER’s Representation about his Lack of Salary (2013)

114. On or about May 17, 2013, RUCKER solicited a contribution from an executive with the Cleveland Browns (“Browns Executive”), ostensibly to support the operations of Amer-I-Can and CPA. RUCKER stated; “with both [Associate 1] and me involved this has always been a project that screams Browns as a necessary partner . . . [Foundation 1] has put a condition on the release of our second 2013 grant. We must raise 100,000 dollars in order to receive our allocation of 225,000 dollars. . . . Hope we can get together soon and as always ‘Go Browns’.”

RUCKER did not disclose his personal use of the Amer-I-Can Bank Account and his diversion of charitable funds.

115. On or about June 7, 2013, RUCKER reiterated his solicitation of the Browns Executive. RUCKER stated that Amer-I-Can had “an urgent short term need!” and asked the Browns for a \$25,000 donation. RUCKER further stated that a \$25,000 donation is “the one thing the Browns can do to help make life easier for Amer-I-Can and the Alliance that we lead.”

116. RUCKER further stated to the Browns Executive, “I do not have a salary with Amer-I-Can at this time.”

Associate 6 (2013)

117. On or about June 25, 2013, RUCKER solicited a contribution from an associate (“Associate 6”) ostensibly to support the operations of Amer-I-Can and CPA. RUCKER did not disclose his personal use of the Amer-I-Can Bank Account and his diversion of charitable funds.

118. On or about July 1, 2013, Amer-I-Can received a donation of \$5,000 from Associate 6’s foundation.

119. On or about July 2, 2013, RUCKER wrote himself a check for \$1,000 from the Amer-I-Can Bank Account, reducing the balance to approximately \$141.20.

RUCKER’s Threat to File Criminal Charges for Misappropriating Grant Funds at the Same Time He Misappropriated Grant Funds (2013)

120. Between on or about August 26, 2013, and November 14, 2013, RUCKER called emergency meetings of CPA members to verify whether the head of another CPA member agency (“CPA Member”) misappropriated CPA grant funds “for purposes other than payroll.”

121. At the meetings, RUCKER asked the CPA Member “Are you comingling funds?” and informed the CPA Member that “if there is misappropriation of funds then this is considered

fraud.” RUCKER stated he would file criminal charges against the CPA Member if the alleged misappropriated funds were not returned within days.

122. RUCKER stated the emergency meetings were “to recover all funds from [CPA Member] for outreach salary as stipulated in the [Foundation 1] agreement.” RUCKER further stated, “there will be no arguments here today, we are here to recover funds and that is all . . . There will be no recourse, the money does not belong to you . . . Grant obligations state where the money goes. You have misallocated funds and this is considered fraud.” RUCKER stated that “[e]verything regarding [grant] funds needs to be substantiated with a check. No one is ever to be paid in cash, for no reason.”

123. After the CPA Member denied wrongdoing, RUCKER stated, “I have no choice but to file charges.”

124. After presentation of information showing a bank error caused the appearance of misappropriation, the CPA Member asked to be exonerated of all charges. RUCKER responded, “You are not exonerated from unethical accounting principles . . . [you] jeopardized CPA . . .”

125. From August 1, 2013, through November 30, 2013, the months during which RUCKER called emergency meetings to threaten criminal fraud charges against CPA Member, RUCKER wrote checks to himself from the Amer-I-Can Bank Account totaling a net amount of approximately \$60,500; withdrew \$600 from an ATM at a shopping center in Cleveland, Ohio; withdrew \$304.99 at the Cleveland Casino; and used the Amer-I-Can Bank Account debit card to charge approximately \$326.88 at various businesses, including a seafood restaurant in Woodmere, Ohio; a convenience store in Mansfield, Ohio; a grocery store in Streetsboro, Ohio; and to purchase in-flight TV service and to pay overdraft fees RUCKER incurred.

126. RUCKER did not disclose to the CPA members during these emergency meetings RUCKER’s personal use of the Amer-I-Can Bank Account and his diversion of charitable funds.

Foundation 1 (2014)

127. On or about November 5, 2013, RUCKER applied to Foundation 1 for a grant to fund CPA in 2014. RUCKER stated the total budget for CPA in 2014 was \$1,797,970.00. RUCKER did not disclose his personal use of the Amer-I-Can Bank Account and his diversion of charitable funds.

128. On or about December 20, 2013, Foundation 1 awarded \$450,000 to fund CPA from January 1, 2014, through December 31, 2014.

129. Between the announcement and his receipt of the grant funds from Foundation 1, RUCKER withdrew approximately \$900 at ATMs in Cleveland, Ohio. During this period, RUCKER also incurred approximately \$150 in overdraft fees in the Amer-I-Can Bank Account.

130. On or about February 10, 2014, Amer-I-Can received \$220,000 of Foundation 1's charitable funds.

131. After receiving the donation, RUCKER withdrew funds from the Amer-I-Can Bank Account on or about the dates and in the approximate amounts listed below:

Date	Transaction	Amount
2/11/2014	Check to RUCKER	\$5,000.00
2/11/2014	Debit Card: Japanese Restaurant, Beachwood, OH	\$55.71
2/12/2014	Check to RUCKER	\$25,000.00
2/13/2014	Debit Card: Seafood Restaurant, Cleveland, OH	\$20.44
3/3/2014	ATM Withdrawal: Cleveland Casino	\$1,004.99
3/7/2014	Check to RUCKER	\$20,000.00
3/7/2014	Withdrawal: Bank Teller	\$2,000.00
3/14/2014	ATM Withdrawal: Shopping Center, Cleveland, OH	\$600.00
3/14/2014	ATM Withdrawal: Shopping Center, Cleveland, OH	\$400.00
3/17/2014	Check to RUCKER	\$5,000.00
3/17/2014	Check to RUCKER (continued)	\$3,000.00

Date	Transaction	Amount
3/17/2014	ATM Withdrawal: Shopping Center, Cleveland, OH	\$600.00
3/17/2014	ATM Withdrawal: Shopping Center, Cleveland, OH	\$400.00
3/21/2014	Check to RUCKER	\$5,000.00
3/31/2014	Check to RUCKER	\$5,000.00
4/2/2014	Check to RUCKER	\$10,000.00
4/7/2014	Debit Card: Money Transfer Service	\$220.00
4/14/2014	ATM Withdrawal: Cleveland Casino	\$1,004.99
4/21/2014	ATM Withdrawal: Shopping Center, Woodmere, OH	\$600.00

132. On or about May 2, 2014, Amer-I-Can received \$220,000 of Foundation 1's charitable funds.

133. After receiving the donation, RUCKER withdrew funds from the Amer-I-Can Bank Account on or about the dates and in the approximate amounts listed below:

Date	Transaction	Amount
5/2/2014	ATM Withdrawal: Cleveland Casino	\$1,004.99
5/2/2014	Debit Card: Grocery Store, Cleveland, OH	\$102.99
5/5/2014	Debit Card: Wine Bar, Warrensville Heights, OH	\$85.09
5/5/2014	Withdrawal: Bank Teller	\$10,000.00
5/6/2014	Check to RUCKER	\$20,000.00
5/16/2014	Check to RUCKER	\$5,000.00
5/16/2014	Check to RUCKER	\$5,000.00
5/16/2014	Withdrawal: Bank Teller	\$2,000.00
5/27/2014	ATM Withdrawal: Cleveland Casino	\$1,004.99
5/28/2014	Check to RUCKER	\$10,000.00
5/28/2014	ATM Withdrawal: Cleveland Casino	\$1,004.99
6/2/2014	Check to RUCKER	\$2,500.00
6/12/2014	Check to RUCKER	\$10,000.00
6/12/2014	ATM Withdrawal: Cleveland Casino	\$1,004.99
6/30/2014	ATM Withdrawal: Cleveland Casino	\$1,004.99
7/1/2014	ATM Withdrawal: Shopping Center, Woodmere, OH	\$60.00
7/3/2014	Check to RUCKER	\$6,000.00
7/3/2014	ATM Withdrawal: Cleveland Casino	\$1,004.99
7/3/2014	ATM Withdrawal: Cleveland Casino	\$1,004.99
7/7/2014	ATM Withdrawal: Beachwood, OH	\$600.00
	(continued)	

Date	Transaction	Amount
7/23/2014	Withdrawal: Bank Teller	\$3,000.00
7/23/2014	ATM Withdrawal: Cleveland Casino	\$1,004.99
7/24/2014	Check to RUCKER	\$20,000.00
7/24/2014	ATM Withdrawal: Cleveland Casino	\$1,004.99

Second Payment of Las Vegas Casino Gambling Debt with Amer-I-Can Funds (2013-14)

134. In or around November 2013, RUCKER caused Foundation 1 to solicit a contribution for Amer-I-Can and CPA from one of its supporting foundations ("Foundation 2"), whose mission was to support programs that reached marginalized and underserved youth in Cleveland, Ohio. RUCKER did not disclose his personal use of the Amer-I-Can Bank Account and his diversion of charitable funds.

135. In or around November 2013, RUCKER incurred a \$25,000 debt at the Las Vegas Casino.

136. In or around December 2013, Foundation 2 approved a \$100,000 grant for CPA.

137. On or about January 6, 2014, Foundation 2 sent CPA's fiscal agent a grant agreement requiring that the \$100,000 donation be used "for the purposes stated above," i.e. for the "Cleveland Peacemakers Alliance Outreach Project."

138. On or about January 22, 2014, Amer-I-Can received \$47,500 donated by Foundation 2. Before the deposit, the Amer-I-Can Bank Account was overdrawn by approximately \$955.88. The same day, RUCKER's Personal Chase Account was overdrawn by approximately \$4,604.83.

139. On or about January 22, 2014, RUCKER deposited a check to himself for \$10,000 from the Amer-I-Can Bank Account into his Personal Chase Account, bringing its balance to approximately \$5,395.17.

140. On or about January 24, 2014, RUCKER wrote himself another check for \$30,000 from the Amer-I-Can Bank Account, bringing the balance in his Personal Chase Account to \$37,270.18.

141. On or about January 29, 2014, the Las Vegas Casino cashed six checks totaling \$25,000, funded in part by money from Amer-I-Can, from RUCKER's Personal Chase Account to the Las Vegas Casino to pay his November 2013 gambling debt.

Foundation 2: Second Disbursement (2014)

142. On or about August 1, 2014, Amer-I-Can received another \$47,500 donated by Foundation 2.

143. After receiving the donation, RUCKER withdrew funds from the Amer-I-Can Bank Account on or about the dates and in the approximate amounts listed below:

Date	Transaction	Amount
8/4/2014	ATM Withdrawal: Cleveland Casino	\$1,004.99
8/5/2014	ATM Withdrawal: Cleveland Casino	\$1,004.99
8/7/2014	ATM Withdrawal: Cleveland Casino	\$1,004.99
8/11/2014	ATM Withdrawal: Cleveland Casino	\$1,004.99
8/15/2014	ATM Withdrawal: Cleveland Casino	\$1,004.99
8/15/2014	ATM Withdrawal: Cleveland Casino	\$1,004.99
8/18/2014	Check to RUCKER	\$10,000.00
8/20/2014	Debit Card: Grocery Store, Cleveland, OH	\$144.49
8/21/2014	ATM Withdrawal: Cleveland Casino	\$1,004.99
8/21/2014	ATM Withdrawal: Cleveland Casino	\$1,004.99
8/22/2014	Check to RUCKER	\$10,000.00
8/22/2014	Withdrawal: Bank Teller	\$3,000.00
8/22/2014	ATM Withdrawal: Cleveland Casino	\$1,004.99
8/22/2014	Debit Card: Grocery Store, Cleveland, OH	\$131.24
8/25/2014	Check to RUCKER	\$5,000.00
8/25/2014	ATM Withdrawal: Cleveland Casino	\$1,004.99
8/27/2014	ATM Withdrawal: Cleveland Casino	\$1,004.99
8/27/2014	Withdrawal: Bank Teller	\$2,000.00
9/2/2014	ATM Withdrawal: Cleveland Casino	\$1,004.99
9/2/2014	ATM Withdrawal: Cleveland Casino	\$1,004.99
(continued)		

Date	Transaction	Amount
9/15/2014	ATM Withdrawal: Cleveland Casino	\$404.99
9/18/2014	Check to RUCKER	\$6,000.00
9/18/2014	ATM Withdrawal: Shopping Center, Cleveland, OH	\$100.00
9/19/2014	Debit Card: Grocery Store, Cleveland, OH	\$90.60

Associate 7 (2014)

144. In or around March 2014, RUCKER attended a fundraising gala for a charity supported by ("Associate 7"). At the gala, RUCKER solicited a contribution from Associate 7, ostensibly to support the operations of Amer-I-Can and CPA. RUCKER did not disclose his personal use of the Amer-I-Can Bank Account and his diversion of charitable funds.

145. On or about October 10, 2014, Amer-I-Can received a \$25,000 donation from Associate 7. Before the donation, the balance in the Amer-I-Can Bank Account was approximately \$463.30.

146. Between on or about October 16, 2014, and October 27, 2014, RUCKER made three separate withdrawals of \$1,004.99 from the Amer-I-Can Bank Account at the Cleveland Casino; wrote himself a check for \$3,000 from the Amer-I-Can Bank Account; withdrew \$4,000 from the Amer-I-Can Bank Account; withdrew \$100 at an ATM in Cleveland, Ohio; and paid multiple personal expenses using the Amer-I-Can debit card, including: \$23.53 at a restaurant in Cleveland, Ohio; and \$17 at a bar in Cleveland, Ohio, reducing its balance to approximately \$17.62.

Foundation 3 (2014)

147. On or about March 10, 2014, RUCKER solicited a contribution from a family-led private foundation ("Foundation 3"), ostensibly to support the operations of Amer-I-Can and CPA. Foundation 3 had previously informed RUCKER that its grants are "always dedicated to a

specific program or project (e.g., not general operating support).” RUCKER did not disclose his personal use of the Amer-I-Can Bank Account and his diversion of charitable funds.

148. On or about March 20, 2014, RUCKER emailed Foundation 3 in response to a question about his application and stated, “[W]e need support to hire additional trained outreach workers, who are all set to go as funding comes in.”

149. On or about June 23, 2014, Foundation 3 emailed RUCKER and stated, “[J]ust a quick note to say that our Trustees met this weekend and approved a \$40,000 grant to Cleveland Peacemakers Alliance. We’ll mail the official grant letter and check by the end of this week or early next. Congratulations!”

150. On or about June 25, 2014, RUCKER responded, “We are so delighted and can’t thank you enough! I also was told that the check would come sooner, is there a possibility that we could receive [sic] it earlier . . .”

151. On or about June 27, 2014, Foundation 3 sent RUCKER a letter announcing the grant and stating that “Acceptance of this check constitutes an agreement to use the grant for the purposes outlined in your 3/10/2014 proposal. Any changes in the use of the grant funds as proposed must be approved by the Foundation office.”

152. On or about July 9, 2014, Amer-I-Can received approximately \$38,000 donated by Foundation 3.

153. After receiving the donation, RUCKER withdrew funds from the Amer-I-Can Bank Account on or about the dates and in the approximate amounts listed below:

Date	Transaction	Amount
7/14/2014	Check to RUCKER	\$5,000.00
7/14/2014	ATM Withdrawal: Cleveland Casino	\$1,004.99
7/14/2014	ATM Withdrawal: Cleveland Casino	\$1,004.99
7/21/2014	Check to RUCKER	\$7,000.00
7/21/2014	ATM Withdrawal: Cleveland Casino	\$1,004.99
7/21/2014	ATM Withdrawal: Cleveland Casino	\$1,004.99

154. On or about January 15, 2015, RUCKER told Foundation 3 that its grant dollars “enabled us to expand our capacity by hiring additional outreach and interventionist personnel . . . We are extremely excited about working with [Foundation 3] in 2015 . . .” RUCKER again failed to disclose his personal use of the Amer-I-Can Bank Account and his diversion of charitable funds.

Cuyahoga County Sherriff (2014)

155. On or about July 14, 2014, RUCKER solicited a contribution from the Cuyahoga County Sheriff’s Department’s Law Enforcement Trust Fund, which consisted of assets seized during the investigation and prosecution of criminal conduct, ostensibly to support the operations of Amer-I-Can and CPA. RUCKER did not disclose his personal use of the Amer-I-Can Bank Account and his diversion of charitable funds.

156. On or about July 14, 2014, the Cuyahoga County Sheriff’s Department emailed RUCKER and stated, “Please send me any information that you can regarding your program and how the funds would be used. I need to ensure that this would be permissible uses for these funds.”

157. On or about July 14, 2014, RUCKER replied, “the funds are needed to hire our personnel awaiting to be assigned and to pay those currently working full time without pay.” The same day, RUCKER wrote himself a check for \$5,000 from the Amer-I-Can Bank Account, and made two separate withdrawals of \$1,004.99 at the Cleveland Casino using the Amer-I-Can debit card.

158. On or about August 13, 2014, RUCKER sent an email to the Cuyahoga County Sheriff. RUCKER stated, “I was informed today that we were receiving a 5000k donation for the Peacemakers Alliance! We are excited to have your support because it means so much to us

that the Sheriff of Cuyahoga County understands what it takes from all of us to stop the violence. We will continue to work hard to protect our communities and our children and perhaps some others will be influenced by your lead and lend a hand. Thank you very much!"

159. On or about August 15, 2014, Amer-I-Can received a \$5,000 donation from the Cuyahoga County Sheriff's Department.

160. On or about August 18, 2014, RUCKER made two separate withdrawals of \$1,004.99 each from the Amer-I-Can Bank Account at the Cleveland Casino.

Associate 2: RUCKER's Representation about His Lack of Salary (2014)

161. On or about August 25, 2014, RUCKER again solicited money from Associate 2. RUCKER stated, "We don't have any contracts that pay me and that's one of the reasons why I'm struggling. I'm not dumping on you, I'm just being totally transparent." RUCKER also stated, "I don't have any money! . . . I can no longer spend my money on the non profit [sic] . . ." RUCKER again did not disclose his personal use of the Amer-I-Can Bank Account and his diversion of charitable funds.

162. During the four preceding days, RUCKER wrote checks to himself and made withdrawals from the Amer-I-Can Bank Account totaling approximately \$18,000 and made four separate withdrawals of \$1,004.99 each from the Amer-I-Can Bank Account at the Cleveland Casino.

CEO-3 (2014)

163. On or about August 25, 2014, RUCKER solicited a contribution from the CEO of a company headquartered in Cleveland, Ohio ("CEO-3"), ostensibly to support the operations of Amer-I-Can and CPA. RUCKER did not disclose his personal use of the Amer-I-Can Bank Account and his diversion of charitable funds.

164. RUCKER stated, "It's not easy asking for help and for the first time in my life I find myself in this position and to tell you the truth it's a little uncomfortable. We are on to [sic] something special with the Cleveland Peacemakers Alliance and I just need some time . . . If my letter has a tone of urgency that's because it is, we are nearing the first payday that we don't have enough cash on hand to meet the payroll." RUCKER further stated, "I apologize for my aggressiveness, officially, we just met, however, I feel as if I've known you for a long time. I read people well and you're a good man. Thanks again!" That same day, RUCKER wrote himself a check for \$5,000, and withdrew \$1,004.99 from the Amer-I-Can Bank Account at the Cleveland Casino.

165. On or about October 14, 2014, RUCKER again solicited CEO-3, stating, "I don't like bothering people, especially very busy people but I believe what I'm doing is very important. I would like to know if there has been a decision of any kind on my request?"

166. CEO-3 responded, "I'm embarrassed that we haven't replied. Shame on me. I'm on it and will find out where we stand promptly."

167. On or about October 15, 2014, RUCKER sent a letter to CEO-3's Director of Community Engagement and stated, "Thank you very much for the 3,000 dollars donation to the Cleveland Peacemakers Alliance. The money will be used to continue our work with at risk youth in the city of Cleveland."

168. On or about October 30, 2014, Amer-I-Can received a \$3,000 donation from CEO-3's company. Before the donation, the Amer-I-Can Bank Account balance was approximately \$17.62.

169. On or about November 3, 2014, RUCKER withdrew \$1,004.99 from the Amer-I-Can Bank Account at the Cleveland Casino, reducing the balance to approximately \$12.63.

Foundation 4 (2014)

170. On or about July 14, 2014, RUCKER solicited a contribution from a foundation focused on the health and well-being of individuals, families, and communities of Greater Cleveland ("Foundation 4"), ostensibly to support the operations of Amer-I-Can and CPA. RUCKER stated, "[W]e have not been able to meet our budgetary goal [of \$1.3 million] and also not able to hire enough staff to meet the enormous demand . . . We would like for [Foundation 4] to play a larger role in this effort, however, we have short term emergency needs and this is why we would prefer to seek immediate support" of \$20,000. RUCKER did not disclose his personal use of the Amer-I-Can Bank Account and his diversion of charitable funds.

171. On or about July 28, 2014, Foundation 4 rejected RUCKER's request for funding.

172. On or about August 12, 2014, RUCKER emailed Foundation 4 and stated, "I don't understand, if there ever was a reason to fund a collaborative community initiative, backed by every law enforcement official, every political expert, the mayor, school officials, have I left anyone out? What do we have to do? If this is too complicated for short term funding, we certainly need to apply for the October cycle . . ."

173. On or about October 28, 2014, RUCKER requested a contribution of \$20,000 and stated that the funds "will be used as 'Bridge Support' for our Intervention & Prevention project that will service the Mt. Pleasant community" of Cleveland, Ohio. RUCKER again failed to disclose his personal use of the Amer-I-Can Bank Account and his diversion of charitable funds.

174. On or about November 14, 2014, the Executive Director of Non-Profit 2 asked RUCKER, "Do you have some news for me regarding [CPA] cash flow?"

175. RUCKER responded, "Unfortunately no . . . [Foundation 4] is only going to give us \$10,000. That will be next week[,] it's a good thing I found that other money [from the

Hospital Trade Association]. So we wait! [sic]" That day, the Amer-I-Can Bank Account was overdrawn by approximately \$121.82.

176. Non-Profit 2's Executive Director responded, "Why only \$10,000.00." RUCKER answered, "Mumbo jumbo, it's [Foundation 4's employee] I believe! The 10k is what they can do now, if we wanted the 20k, it would take longer because of their due diligence process . . . or as I said take 10k right now."

177. On or about November 18, 2014, Foundation 4 sent a letter to RUCKER announcing its approval of a \$10,000 grant to Amer-I-Can. Foundation 4 stated that its grant was "for bridge support" but that "there is strong concern about where this funding will bridge Peacemakers to and how will CPA sustain itself over the long term . . . We would like to keep the door open to a future partnership, but one in which CPA has the ability to display a broad base of funding."

178. Foundation 4 informed RUCKER that its grant funds "may be expended only for charitable . . . purposes. This grant is made only for the purpose stated in this letter and outlined in your proposal and it is understood that these grant funds will be used for purposes in accordance with the approved budget."

179. On or about November 19, 2014, RUCKER signed the grant letter from Foundation 4 under the heading "ACCEPTED AND AGREED".

180. On or about November 19, 2014, Amer-I-Can received a \$10,000 donation from Foundation 4.

181. On or about November 20, 2014, RUCKER wrote himself a check for \$10,000.

182. RUCKER submitted and caused to be submitted a report to Foundation 4 on or about March 31, 2015, that stated, "We appreciate the bridge support granted us by [Foundation

4,] it was helpful in being able to assist high risk and gang affiliated youth. The continued support of [Foundation 4] will be instrumental . . .”

CEO-2 (2014)

183. On or about November 17, 2014, the Amer-I-Can Bank Account was overdrawn by approximately \$142.82.

184. On or before November 18, 2014, RUCKER solicited another donation from CEO-2 and the Hospital Trade Association, ostensibly to support the operations of Amer-I-Can and CPA. RUCKER again failed to disclose his personal use of the Amer-I-Can Bank Account and his diversion of charitable funds.

185. On or about November 18, 2014, RUCKER told CEO-2 that Foundation 4 “gave us 10k, instead of the 20 they promised, I’m grateful, don’t get [me] wrong, however, I’m hustling to make payroll,” despite knowing that RUCKER chose to accept less money from Foundation 4 to avoid its “due diligence process.” RUCKER further stated, “I apologize but could I possibly pick up the check [donated by the Hospital Trade Association] as soon as humanly possible?”

186. On or about November 18, 2014, Amer-I-Can received a \$30,000 donation from the Hospital Trade Association.

187. After receiving the donation, RUCKER withdrew funds from the Amer-I-Can Bank Account on or about the dates and in the approximate amounts listed below:

Date	Transaction	Amount
11/18/2014	Check to RUCKER	\$7,000.00
11/20/2014	Check to RUCKER	\$1,200.00
11/21/2014	Withdrawal: Bank Teller	\$3,000.00
11/21/2014	ATM Withdrawal: Cleveland Casino	\$304.99
11/21/2014	Debit Card: Chinese Restaurant, Beachwood, OH	\$36.51
11/24/2014	ATM Withdrawal: Cleveland Casino	\$504.99

188. After RUCKER's withdrawals on or about November 24, 2014, the balance in the Amer-I-Can Bank Account was approximately \$90.12.

Hospital 1 (2014)

189. On or about July 31, 2014, RUCKER solicited a \$50,000 contribution from a local hospital ("Hospital 1"), ostensibly to support the operations of Amer-I-Can and CPA. RUCKER did not disclose his personal use of the Amer-I-Can Bank Account and his diversion of charitable funds.

190. On or about December 1, 2014, and as set forth below in more detail, RUCKER emailed the Las Vegas Casino to make arrangements to repay a \$20,000 unpaid gambling debt.

191. On or about December 17, 2014, RUCKER emailed the Executive Director of the fiscal agent for the Foundation 1 grant ("Fiscal Agent Executive Director"). RUCKER stated, "I've been notified, finally, that [Hospital 1] will give [CPA] a 25k check . . . Don't have to tell you how many hungry mouths are awaiting those funds. Appreciate whatever can be done to expedite asap. . ."

192. On or about December 18, 2014, RUCKER emailed Fiscal Agent Executive Director and stated, "can you do me a favor? Can you cut us a check for 25k today, I know it's a lot to ask but we need some money right now!"

193. The Fiscal Agent Executive Director responded, "I can't as I don't have the cash I also need it signed by another person. I probably can get it Monday if I get the check from [Hospital 1] today."

194. On or about December 22, 2014, Fiscal Agent Executive Director sent Amer-I-Can a \$23,750 wire transfer of funds donated by Hospital 1. Before the wire transfer, the balance in the Amer-I-Can Bank Account was approximately \$0.00.

195. On or about December 22, 2014, RUCKER wrote himself a check for approximately \$3,750 from the Amer-I-Can Bank Account.

196. Between on or about December 26, 2014, and January 2, 2015, RUCKER paid for personal expenses using the Amer-I-Can debit card, including approximately \$12.96 at a fast food restaurant in Cleveland, Ohio; \$121.99 at an ATM in Warrensville Heights, Ohio; and \$92.06 at a seafood restaurant in Woodmere, Ohio, after which the Amer-I-Can Bank Account was overdrawn by approximately \$593.49.

Third Payment of Las Vegas Casino Gambling Debt with Amer-I-Can Funds (2014)

197. On or about September 5, 2014, RUCKER incurred a debt of approximately \$20,000 at the Las Vegas Casino through short-term lines of credit commonly referred to as "markers."

198. On or about November 8, 2014, RUCKER emailed the Las Vegas Casino. RUCKER stated, "fyi, here's what is going on. I have a settlement in front [sic] of the nfl . . . They're [sic] counter offer is not what I will accept at this time. I can't have my casino debt pressure me into settling for less than I know I will get. Unfortunately, [the casino] basically gave me one week [to repay the markers] and I didn't get to suggest when I could pay it back. So, if they send it in, I can't cover it and I'll have to deal with the consequences which I wanted to avoid because it's not about not paying, I can pay, it's just taking more time than I thought. Thanks for your support but I can't pay it until I get my check and I don't believe that will be until 10 days, no more than that."

199. The Las Vegas Casino responded, "As I mentioned before Reggie it is out of my hands for any more time . . ."

200. On or about November 21, 2014, RUCKER emailed the Las Vegas Casino and stated, "I have signed the paper work for settlement and money will be transferred top of the

week no later than Wednesday. You can present markers for payment, Wednesday just to be sure. Thank you for bearing with me.”

201. As set forth above, RUCKER wrote himself checks totaling approximately \$21,200 from the Amer-I-Can Bank Account between November 18, 2014, and November 21, 2014.

202. On or about November 24, 2014, RUCKER emailed the Las Vegas Casino and stated, “Money came early and you may deposit markers! I appreciate your understanding and willingness to work with me. Sometimes these things don’t go as planned.” That day, RUCKER made a cash deposit of approximately \$25,500 into his Personal Chase Account and received a wire transfer of approximately \$17,500 from a company that specialized in making loans to professional athletes.

203. Between on or about November 28, 2014, and December 1, 2014, the Las Vegas Casino successfully presented markers totaling approximately \$15,000 to RUCKER’s Personal Chase Account, after which the account was overdrawn by approximately \$875.58, and RUCKER had insufficient funds to repay the remaining \$5,000 he owed to the Las Vegas Casino.

204. On or about December 1, 2014, RUCKER emailed the Las Vegas Casino and stated, “I am going to have to make arrangement with you for payment. The bank closed my account and the money I had put in to pay my markers has been cannibalized. It looks like . . . other creditors got paid. I don’t know why it took so long because the money was there. Please accept my apology but I have to get my financial situation in order and am willing to work with you to get it done as quickly as possible.”

205. On or about December 2, 2014, RUCKER opened checking account number xxxx7006 at First Merit Bank (“First Merit Account”).

206. On or about December 26, 2014, RUCKER emailed the Las Vegas Casino and stated, "I will not be able to repay the 5k until Feb 1st with the possibility that it could be paid by January 22nd." As set forth below, Amer-I-Can received approximately \$47,500 donated from Foundation 2 on or about January 26, 2015.

207. The Las Vegas Casino responded, "Why the delay in clearing \$5,000 return? You said funds were in the account. This amount owed is from September."

208. RUCKER replied, "The funds were there when I told you, however, for some reason the markers didn't come in." RUCKER stated, "the funds were eaten up by other direct pay accounts and I have no clue what has transpired . . ." RUCKER then well knew that he had written a check to "CASH" for \$3,000 and had withdrawn approximately \$5,549.98 from his Personal Chase Account at the Cleveland Casino between on or about November 29, 2014, and December 1, 2014. RUCKER further stated, "I won't have that kind of money [\$5,000] until the aforementioned time frame [February 1, 2015]. I thought we had this taken care of but something out of my control took place and you didn't get the money that was in the account for you. I will have no money for the next three weeks, nothing!!"

209. On or about January 24, 2015, RUCKER emailed the Las Vegas Casino and stated "the funds will be available [from my First Merit Account] on Wednesday January 28th, 2015." On the date of his email, RUCKER's First Merit Account was overdrawn by approximately \$433.20.

210. On or about January 26, 2015, RUCKER wrote himself a check for \$10,000 from the Amer-I-Can Bank Account, which as set forth below, consisted of funds donated that same day by Foundation 2, and deposited it into his First Merit Account.

211. On or about January 30, 2015, RUCKER wrote a check, funded in part by money from Amer-I-Can, from his First Merit Account to the Las Vegas Casino for \$5,000 to pay his September 2014 gambling debt.

Foundation 2 (2015)

212. In or around December 2014, Foundation 2 approved a \$100,000 donation to support CPA in 2015. RUCKER did not disclose his personal use of the Amer-I-Can Bank Account and his diversion of charitable funds.

213. On or about January 7, 2015, Foundation 2 sent the Fiscal Agent Executive Director a grant agreement requiring that its \$100,000 donation be used “for the purposes stated above,” specifically the “Cleveland Peacemakers Alliance Outreach Project.”

214. On or about January 26, 2015, the Fiscal Agent Executive Director sent Amer-I-Can a \$47,500 wire transfer of funds donated by Foundation 2. Before the wire transfer, the Amer-I-Can Bank Account was overdrawn by approximately \$739.49.

215. After receiving the donation, RUCKER withdrew funds from the Amer-I-Can Bank Account on or about the dates and in the approximate amounts listed below:

Date	Transaction	Amount
1/26/2015	Check to RUCKER	\$10,000.00
1/26/2015	ATM Withdrawal: Woodmere, OH	\$500.00
1/27/2015	ATM Withdrawal: Beachwood, OH	\$500.00
1/27/2015	Transfer to PNC Account xxxx0543: RUCKER's Home Mortgage Loan	\$2,025.25
1/29/2015	Withdrawal: Bank Teller	\$800.00
2/2/2015	ATM Withdrawal: Cleveland Casino	\$1,004.99
2/5/2015	ATM Withdrawal: Shaker Hts., OH	\$200.00
2/5/2015	ATM Withdrawal: Cleveland Casino	\$264.99
2/5/2015	ATM Withdrawal: Cleveland Casino	\$44.99

216. After RUCKER's withdrawals on or about February 5, 2015, the balance in the Amer-I-Can Bank Account was approximately \$88.15.

Foundation 1 (2015)

217. On or about November 3, 2014, RUCKER applied to Foundation 1 for a grant to fund CPA in 2015. RUCKER stated the total budget for CPA in 2015 was \$1,797,970. RUCKER did not disclose his personal use of the Amer-I-Can Bank Account and his diversion of charitable funds.

218. On or about December 19, 2014, Foundation 1 awarded \$400,000 to fund CPA from January 1, 2015, through December 31, 2015.

219. On or about February 6, 2015, Amer-I-Can received a wire transfer of \$190,000 of funds donated by Foundation 1.

220. After receiving the donation, RUCKER withdrew funds from the Amer-I-Can Bank Account on or about the dates and in the approximate amounts listed below:

Date	Transaction	Amount
2/6/2015	Check to RUCKER	\$3,000.00
2/6/2015	Transfer to PNC Account xxxx0543: RUCKER's Home Mortgage Loan	\$2,025.25
2/9/2015	Check to RUCKER	\$5,000.00
2/9/2015	Check to RUCKER	\$3,000.00
2/9/2015	Check to RUCKER	\$3,000.00
2/9/2015	ATM Withdrawal: Cleveland Casino	\$1,004.99
2/9/2015	ATM Withdrawal: Cleveland Casino	\$1,004.99
2/9/2015	ATM Withdrawal: Woodmere, OH	\$600.00

Use of the Wires to Execute the Scheme and Artifice to Defraud

221. On or about the dates listed below, in the Northern District of Ohio, Eastern Division, and elsewhere, Defendant REGINALD J. RUCKER, aka REGGIE RUCKER, for the purpose of executing the scheme and artifice described above, transmitted and caused to be transmitted, by means of wire communications in interstate and foreign commerce, writings, signs, signals, pictures and sounds, to and from the Northern District of Ohio, as set forth below. Each of the communications set forth below either originated in the Northern District of Ohio

and was then transmitted to a place outside the State of Ohio, or was received in the Northern District of Ohio after having traveled outside the State of Ohio:

ATM Withdrawals by RUCKER From the Amer-I-Can Bank Account

Date	Location	Amount
4/7/2011	Florida Casino ATM	\$1,004.00
12/27/2011	Las Vegas Casino ATM (continued)	\$1,004.99
7/6/2012	Cleveland Casino ATM	\$1,004.99
5/10/2013	Cleveland Casino ATM	\$1,004.99
11/3/2014	Cleveland Casino ATM	\$1,004.99
2/9/2015	Cleveland Casino ATM	\$1,004.99

Wire Transfers

Date	Wire Transfer	Amount
12/22/2014	Fed Wire from CPA Fiscal Agent FirstMerit Bank Account Number xxx-0555 to Amer-I-Can PNC Bank Account Number xxx-6732	\$23,750.00
1/26/2015	Fed Wire from CPA Fiscal Agent FirstMerit Bank Account Number xxx-0555 to Amer-I-Can PNC Bank Account Number xxx-6732	\$47,500.00
2/6/2015	Fed Wire from CPA Fiscal Agent FirstMerit Bank Account Number xxx-0555 to Amer-I-Can PNC Bank Account Number xxx-6732	\$190,000.00

Emails Sent by RUCKER

Date	Recipient	Email Communication
1/30/2013	Las Vegas Casino	"[T]his is my non profit [sic] and they were a little behind in getting me my money."
6/7/2013	Cleveland Browns	"I do not have a salary with Amer-I-Can at this time."
7/14/2014	Cuyahoga County Sheriff's Department	"[T]he funds are needed to hire our personnel awaiting to be assigned and to pay those currently working full time without pay."
8/25/2014	Associate 2	"We don't have any contracts that pay me . . ."
10/15/2014	CEO-3	"Thank you very much for the 3,000 dollars donation to the Cleveland Peacemakers Alliance. The money will be used to continue our work with at risk youth in the city of Cleveland."
12/17/2014	Fiscal Agent Executive Director	"Don't have to tell you how many hungry mouths are awaiting those funds. Appreciate whatever can be done to expedite asap. . ."
1/24/2015	Las Vegas Casino	"[T]he funds [to repay my casino gambling debt] will be available on Wednesday January 28th, 2015."

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

The United States Attorney further charges:

COUNT 2

(False Statements to Law Enforcement, 18 U.S.C. § 1001)

222. The factual allegations contained in Paragraphs 1-6, 13-15, 19, 22, 29, and 212-220 of this Information are re-alleged and incorporated by reference as if fully set forth herein.

General Allegations: Mortgage Payments

223. On or about January 27, 2015, RUCKER transferred \$2,025.25 from the Amer-I-Can Bank Account to PNC Bank account number xxxx0543 to pay RUCKER's home mortgage payment.

224. On or about February 6, 2015, RUCKER transferred \$2,025.25 from the Amer-I-Can Bank Account to PNC Bank account number xxxx0543 to pay RUCKER's home mortgage payment.

General Allegations: "No Activity" in Amer-I-Can Bank Account in 2015

225. On or about January 2, 2015, RUCKER used the Amer-I-Can Bank Account debit card to charge approximately \$92.06 at a seafood restaurant in Woodmere, Ohio.

226. On or about January 26, 2015, Amer-I-Can received a \$47,500 wire transfer of funds donated by Foundation 2. Before the wire transfer, the Amer-I-Can Bank Account was overdrawn by approximately \$739.49 and had incurred approximately \$134 in overdraft fees.

227. On or about January 26, 2015, RUCKER wrote himself a check for \$10,000 from the Amer-I-Can Bank Account.

228. On or about January 26, 2015, RUCKER withdrew \$500 at an ATM in Woodmere, Ohio, from the Amer-I-Can Bank Account.

229. On or about January 27, 2015, RUCKER withdrew \$2,025.25 from the Amer-I-Can Bank Account at a PNC Bank branch in Woodmere, Ohio.

230. On or about January 27, 2015, RUCKER withdrew \$500 at an ATM in Beachwood, Ohio, from the Amer-I-Can Bank Account

231. On or about January 29, 2015, RUCKER withdrew \$800 at a PNC Bank branch from the Amer-I-Can Bank Account.

232. On or about February 2, 2015, RUCKER withdrew \$1,004.99 at an ATM at the Cleveland Casino from the Amer-I-Can Bank Account.

233. From on or about January 28, 2015, through February 2, 2015, RUCKER wrote and caused to be written checks from the Amer-I-Can Bank Account to twenty three individuals for a total of approximately \$30,626.64.

234. On or about February 5, 2015, RUCKER withdrew \$200 at an ATM in Shaker Heights, Ohio.

235. On or about February 5, 2015, RUCKER made two separate withdrawals, of \$264.99 and \$44.99, respectively, from the Amer-I-Can Bank Account at an ATM at the Cleveland Casino, bringing the balance to approximately \$88.15.

236. On or about February 6, 2015, Amer-I-Can received a wire transfer of \$190,000 of funds donated by Foundation 1.

237. On or about February 6, 2015, RUCKER wrote himself a check for \$3,000 from the Amer-I-Can Bank Account.

238. On or about February 6, 2015, RUCKER withdrew \$2,025.25 from the Amer-I-Can Bank Account at a PNC Bank branch in Woodmere, Ohio.

239. On or about February 9, 2015, RUCKER wrote himself one for \$5,000, and two for \$3,000 each; made two separate withdrawals of \$1,004.99 each at an ATM at the Cleveland

Casino; and withdrew \$600 at an ATM in Woodmere, Ohio, all from the Amer-I-Can Bank Account.

240. On or about February 11, 2015, the FBI interviewed RUCKER in connection with its investigation into his use of Amer-I-Can's and CPA's charitable funds.

The Offense

241. On or about February 11, 2015, in the Northern District of Ohio, Eastern Division, Defendant REGINALD J. RUCKER, aka REGGIE RUCKER, knowingly and willfully made materially false, fictitious, and fraudulent statements and representations to the FBI in a matter within the jurisdiction of the executive branch of the Government of the United States, that is:

(1) When the FBI asked RUCKER if he ever used the Amer-I-Can Bank Account to pay his mortgage, he told the FBI he had not.

(2) RUCKER told the FBI that there had been "no activity" in the Amer-I-Can Bank Account in 2015.

242. RUCKER well knew when he made those statements to the FBI that the statements were false.

All in violation of Title 18, United States Code, Section 1001.

CAROLE S. RENDON
Acting United States Attorney


