

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

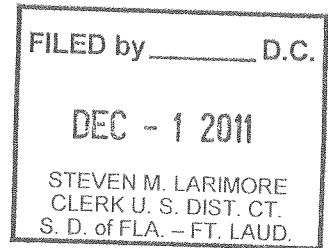
CASE NO. 11cr-60281-Harley-Vitunac
18 U.S.C. § 371

UNITED STATES OF AMERICA

v.

WILLIAM BOOCKVOR,
a/k/a Bill Brock,
a/k/a Uncle Bill,

Defendant.



INFORMATION

The United States Attorney charges that, at all times relevant to this Information:

GENERAL ALLEGATIONS

1. Rothstein, Rosenfeldt and Adler, P.A. (hereinafter referred to as "RRA") was a law firm with offices located at 401 East Las Olas Boulevard, Fort Lauderdale, Florida and elsewhere. The law firm employed approximately seventy attorneys and engaged in the practice of law involving a wide range of specialties, including labor and employment law.
2. Scott W. Rothstein (hereinafter referred to as "Rothstein") was an attorney and the Chief Executive Officer (CEO) and Chairman of RRA.
3. The defendant, WILLIAM BOOCKVOR, was employed at RRA, where he performed various administrative functions, including bookkeeping responsibility for RRA's operating account.
4. TD Bank, N.A., (hereinafter referred to as "TD Bank") was a large commercial bank with branch offices in 13 states, including offices in Weston, Florida and Deerfield Beach, Florida. The executive offices of TD Bank were located in Portland, Maine and Cherry Hill, New Jersey.

5. Rothstein and RRA maintained approximately 38 bank accounts at TD Bank, which were utilized during the course of the fraudulent investment scheme further described below.

6. During the course of the fraudulent investment scheme further described below, funds were remitted to TD Bank by investors, and paid to investors by TD Bank, through wire transfers that were transmitted in interstate and foreign commerce.

COUNT 1

(Conspiracy to Commit Wire Fraud, 18 U.S.C. § 371)

1. The General Allegations Section of this Information are realleged and expressly incorporated herein as if set forth in full.

2. From in or about 2007 through in or about October 2009, in Broward County, in the Southern District of Florida, and elsewhere, the defendant,

WILLIAM BOOCKVOR,
a/k/a Bill Brock,
a/k/a Uncle Bill,

did knowingly and willfully combine, conspire, confederate, and agree with Rothstein and with other persons known and unknown to the United States Attorney to commit an offense against the United States of America, that is, to devise and intend to devise a scheme and artifice to defraud and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises, and, for the purpose of executing such scheme and artifice to defraud and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises, to knowingly transmit and cause to be transmitted by means of wire communication in interstate and foreign commerce, certain signs, signals, and sounds, in violation of Title 18, United States Code, Section 1343 (Wire Fraud).

THE PURPOSE AND OBJECT OF THE CONSPIRACY

3. The purpose and object of the conspiracy was to enrich the members of the conspiracy by various means, including obtaining investors' money for the conspirators own use and benefit and the benefit of others through the operation of a fraudulent investment scheme.

THE MANNER AND MEANS OF THE CONSPIRACY

The Fraudulent Investment Scheme

4. It was part of the conspiracy that, beginning in or about 2007, Rothstein and other co-conspirators began operating a fraudulent investment scheme.

5. It was further part of the conspiracy that the potential investors in the fraudulent investment scheme were informed that either RRA or firms affiliated with RRA represented potential plaintiffs (hereinafter referred to as "plaintiffs") in sexual harassment, discrimination, and/or whistleblower suits and that settlements of these claims had been negotiated prior to filing law suits.

6. It was further part of the conspiracy that potential investors were informed that, pursuant to the aforesaid settlement agreements, the terms thereof were to remain confidential.

7. It was further part of the conspiracy that potential investors were informed: that the plaintiffs would accept discounted lump-sum payments; that the investors would fund the lump-sum payments to the plaintiffs; and, that, in exchange, potential investors would receive the installment payments due and owing to the plaintiffs under the terms of the negotiated settlement agreements.

8. It was further part of the conspiracy that the potential investors were informed by Rothstein and other co-conspirators that pools of confidential settlement agreements were available for purchase in amounts ranging from hundreds of thousands of dollars to millions of dollars.

9. It was further part of the conspiracy that potential investors were told that the amounts due the plaintiffs were paid into trust accounts at TD Bank controlled by Rothstein and RRA, and that said funds would only be utilized to pay the potential investors.

10. It was further part of the conspiracy that, in fact, there were no such plaintiffs who had entered into the above-described confidential settlement agreements. Instead, Rothstein would utilize the funds obtained from potential investors to further the fraudulent scheme by: (a) paying prior investors in the scheme; (b) supplementing and supporting the operation and activities of RRA; (c) distributing lavish gifts, including exotic automobiles, jewelry, boats, loans, cash and bonuses, to partners and employees of RRA and various other individuals in order to engender goodwill and loyalty and to create the appearance of a successful law firm; (d) making political contributions to local, state, and federal political candidates in order to secure the elections of public officials; (e) making large charitable contributions to public and private charitable institutions, including hospitals and other legitimate charitable and nonprofit organizations, in order to deflect any negative scrutiny by the public and/or law enforcement agencies and to create the public impression of altruism and commitment to the community; and (f) creating the appearance of affluence and wealth, by purchasing expensive real and personal property, in order to convince potential investors of the legitimacy of RRA and of the purported investment opportunities.

11. It was further part of the conspiracy that Rothstein and others would prepare fraudulent bank balance statements reflecting that funds were being held on deposit in trust accounts at TD Bank when, in fact, they were not.

12. It was further part of the conspiracy that Rothstein would arrange for investors and their representatives to be taken to branches of TD Bank for the purported purpose of confirming with bank employees that sufficient monies to fund their investments in accordance with the terms of such investments were being held in trust accounts at TD Bank.

The Co-conspirators

13. It was further part of the conspiracy that, at different times, Rothstein would utilize co-conspirators to assist him in carrying out various aspects of the fraudulent investment scheme, including

the following: attorneys, who would falsely claim to represent the plaintiffs in the sexual harassment, discrimination, and/or whistle-blower suits; bank employees, who would provide false documents and other misleading information to investors in order to make it appear that the funds purportedly being held in the trust accounts for the plaintiffs had not been dissipated; allegedly independent verifiers, who would purport to verify that the persons and entities entering into the confidential settlement agreements were genuine and that there were sufficient funds in the trust accounts at TD Bank to pay the investors; accountants and/or bookkeepers, who would transfer funds between the various trust accounts and other bank accounts in order to perpetuate the fraudulent investment scheme; computer experts, who would create false bank statements and web sites in order to make it appear to investors that the funds purportedly being held in the trust accounts for the plaintiffs had not been dissipated; office workers at RRA, who would create false documents in connection with the purported confidential settlement agreements; individuals, who would pose as the potential plaintiffs claiming to be entitled to a settlement from the litigation; and financial advisors, who would induce investors through fraudulent misrepresentations to send hundreds of millions of dollars to Rothstein to purchase the fraudulent confidential settlement agreements.

TD Bank Employees

14. It was further part of the conspiracy that defendant BOOCKVOR would provide to employees of TD Bank fraudulent bank balance statements which falsely reflected the balances of trust accounts held by RRA at TD Bank.

15. It was further part of the conspiracy that defendant BOOCKVOR corruptly would assist employees of TD Bank in preparing envelopes containing the fraudulent bank balance statements along with cover letters stating that the stated balances were accurate when, in fact, they were not.

16. It was further part of the conspiracy that employees of TD Bank would thereafter provide those envelopes containing the fraudulent bank balance statements to Rothstein in the presence of

investors or their representatives, thus inducing the investors or their representatives into believing that balances existed in the accounts sufficient to fund their investments when, in fact, they did not.

A Person Posing as a Banker

17. It was further part of the conspiracy that, at times, a co-conspirator agreed to pose as a TD Bank employee during meetings with investors in order to deceive those investors.

18. It was further part of the conspiracy that Rothstein would contact TD Bank employees, generally at the Weston, Florida branch, and request the use of a conference room at the bank.

19. It was further part of the conspiracy that defendant BOOCKVOR would provide to the co-conspirator posing as a TD Bank employee the fraudulent bank balance statements which falsely reflected the balances of trust accounts at TD Bank.

20. It was further part of the conspiracy that the co-conspirator posing as a TD Bank employee would and did hand the investors or their representatives the fraudulent bank balance statements, which the investors would compare to fraudulent bank statements previously provided by Rothstein, thus inducing the investors or their representatives into believing that balances existed in the accounts sufficient to fund their investments when, in fact, they did not.

OVERT ACTS

21. In furtherance of the conspiracy and to achieve the purpose and object thereof, at least one of the conspirators committed and caused to be committed in the Southern District of Florida and elsewhere, at least one of the following acts, among others:


A. On or about September 11, 2009, defendant BOOCKVOR provided to a TD Bank employee a fraudulent bank balance statement which falsely reflected that an account held in the name of RRA contained \$20,000,000.00.

B. On or about September 11, 2009, the aforesaid TD Bank employee provided to Rothstein, in the presence of a representative of an investment group (identified herein as "EC"), the

aforesaid fraudulent bank balance statement along with a letter on TD Bank letterhead reflecting that the aforesaid fraudulent bank balance statement was genuine.

C. On September 11, 2009, \$10,000,000.00 was wire transferred from an account of EC at Apple Bank in New York City, New York to an account of RRA at TD Bank in Ft. Lauderdale, Florida.

All in violation of Title 18, United States Code, Section 371.



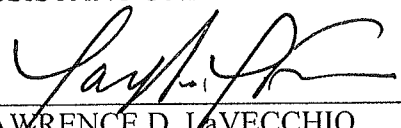
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