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FILED IN OPEN COURT

AFL

NOV 26 2019

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF ALABAMA  
SOUTHERN DIVISION

CHARLES R. DIARD, JR.  
CLERK

UNITED STATES OF AMERICA

\*

CRIM. NO. 19-00300-CG

\*

USAO NO. 19R00516

v.

\*

VIOLATIONS: 18 USC § 1349

\*

18 USC § 1343

ALEXANDER LEO RODGERS

\*

18 USC § 641

**INDICTMENT**

**THE GRAND JURY CHARGES:**

**Count One**

**Conspiracy**

**Title 18, United States Code, Section 1349**

1. From on or about May 8, 2017, continuing to on or about February 17, 2019, the exact dates being unknown, in the Southern District of Alabama, Southern Division, and elsewhere, defendant

**ALEXANDER LEO RODGERS**

knowingly and willfully conspired, combined, and agreed together with unindicted coconspirator Mittie Chamblis, aka Mittie Rodgers to devise and intend to devise a scheme and artifice to defraud the United States by means of materially false and fraudulent pretenses, representations, and promises by use of interstate wire transmissions, in violation of 18 U.S.C. § 1343.

**Manner and Means of the Conspiracy**

2. It was part of the conspiracy that defendant **ALEXANDER LEO RODGERS** and unindicted coconspirator Mittie Chambliss, aka Mittie Rodgers conspired to achieve personal

financial gain by defrauding the United States Social Security Administration (SSA) and others of approximately \$51,754.00.

3. It was a further part of the conspiracy that Mittie Chambliss, aka Mittie Rodgers, using an electronic device, established a MySSA account in the name of Social Security beneficiary G.O.H.

4. It was a further part of the conspiracy that defendant **ALEXANDER LEO RODGERS** caused interstate wire communications when he prepared and submitted Electronic Representative Payee Accounting Forms falsely claiming to be SSA beneficiary and Representative Payee B.L.W., which misled the SSA to believe that it should continue to pay SSA benefits into the joint bank account of B.L.W. and G.O.H.

5. It was a further part of the conspiracy that defendant **ALEXANDER LEO RODGERS** and Mittie Chambliss, aka Mittie Rodgers intentionally failed to pay property taxes on G.O.H.'s property and then, using SSA funds from the joint account of B.L.W. and G.O.H. to pay the taxes in their names, acquired title to G.O.H.'s property.

6. It was a further part of the conspiracy that defendant **ALEXANDER LEO RODGERS** caused interstate wire communications when he withdrew SSA benefits from the bank account of B.L.W. and G.O.H. and paid personal expenses electronically.

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

**Count Two**  
**Wire Fraud**  
**Title 18, United States Code, Section 1343**

7. The factual allegations of paragraphs 1 through 6 of this Indictment are re-alleged as though fully set forth herein.

8. From on or about May 8, 2017, continuing to on or about February 17, 2019, the exact dates being unknown, in the Southern District of Alabama, Southern Division, and elsewhere, defendant

**ALEXANDER LEO RODGERS**

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

**Purpose of the Scheme and Artifice**

9. The purpose of the scheme and artifice to defraud is set out in paragraphs 2 through 6 of this Indictment. Paragraph 2 is hereby incorporated by reference as though fully set forth herein, with the words “It was part of the scheme and artifice to defraud” replacing “It was part of the conspiracy at the start of the paragraph. Paragraphs 3 through 6 are hereby incorporated by reference as though fully set forth herein, with the words “It was a further part of the scheme and artifice to defraud” replacing “It was a further part of the conspiracy” at the start of each paragraph.

**The Wire Communication**

10. On or about July 25, 2017, in the Southern District of Alabama, Southern Division, and elsewhere, defendant

**ALEXANDER LEO RODGERS**

for the purpose of executing the above-described scheme and artifice and attempting to do so, did cause to be transmitted in interstate commerce, by means of a wire communication, certain signs and signals, that is, defendant **ALEXANDER LEO RODGERS** caused an interstate wire communication between Alabama and another state when he submitted a false Electronic

Representative Payee Accounting Form to SSA.

**Count Three**  
**Wire Fraud**  
**Title 18, United States Code, Section 1343**

11. The factual allegations of paragraphs 1 through 6 of this Indictment are re-alleged as though fully set forth herein.

12. From on or about May 8, 2017, continuing to on or about February 17, 2019, the exact dates being unknown, in the Southern District of Alabama, Southern Division, and elsewhere, defendant

**ALEXANDER LEO RODGERS**

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

**Purpose of the Scheme and Artifice**

13. The purpose of the scheme and artifice to defraud is set out in paragraphs 2 through 6 of this Indictment. Paragraph 2 is hereby incorporated by reference as though fully set forth herein, with the words “It was part of the scheme and artifice to defraud” replacing “It was part of the conspiracy” at the start of the paragraph. Paragraphs 3 through 6 are hereby incorporated by reference as though fully set forth herein, with the words “It was a further part of the scheme and artifice to defraud” replacing “It was a further part of the conspiracy” at the start of each paragraph.

**The Wire Communication**

14. On or about August 27, 2018, in the Southern District of Alabama, Southern Division, and elsewhere, defendant

**ALEXANDER LEO RODGERS**

for the purpose of executing the above-described scheme and artifice and attempting to do so, did cause to be transmitted in interstate commerce, by means of a wire communication, certain signs and signals, that is, defendant **ALEXANDER LEO RODGERS** caused an interstate wire communication between Alabama and another state when he submitted a false Electronic Representative Payee Accounting Form to SSA.

**Counts Four through Six  
Theft of Public Money  
Title 18, United States Code, Sections 641 and 2**

15. The factual allegations of paragraphs 1 through 6 of this Indictment are re-alleged as though fully set forth herein.

16. On or about the dates listed below, in the Southern District of Alabama, Southern Division, and elsewhere, defendant

**ALEXANDER LEO RODGERS**

willfully and knowingly did steal and purloin money belonging to the United States, as described in each count, of a total value exceeding \$1,000.00.

17. The allegations of paragraphs 15 and 16 of this Indictment are re-alleged for Counts 4 through 6 as though fully set forth therein.

<b>COUNT</b>	<b>DATE</b>	<b>AMOUNT</b>
4	December 5, 2018	\$800.00
5	May 4, 2019	\$800.00
6	May 5, 2019	\$800.00

All in violation of Title 18, United States Code, Sections 641 and 2.

**FORFEITURE NOTICE**

The allegations contained in Counts One through Three of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeitures pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c).

Upon conviction of the offenses in violation of 18 U.S.C. §§ 1343 and 1349 set forth in Counts One through Six of this Indictment, the defendant named in Counts One through Three shall forfeit to the United States of America, pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the offenses, including Mobile County, Alabama real property with Parcel # 1705150000035.051, located at 9090 Countryview Lane, Wilmer, Alabama 36587, with a mailing address of 9485 Hubert Morris Road, Wilmer, Alabama 36587. If any of the forfeitable property, because of any act or omission of the defendant:

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

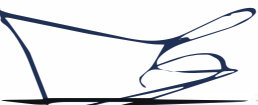
the United States of America shall be entitled to forfeiture of substitute property pursuant to 21 U.S.C. § 853(p), as incorporated by 28 U.S.C. § 2461(c).

A TRUE BILL

FOR FOREMAN UNITED STATES GRAND JURY  
SOUTHERN DISTRICT OF ALABAMA

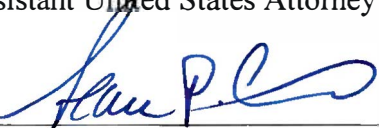
RICHARD W. MOORE  
UNITED STATES ATTORNEY

By



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ALEX F. LANKFORD, IV  
Assistant United States Attorney



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SEAN P. COSTELLO  
Assistant United States Attorney  
Chief, Criminal Division

NOVEMBER 2019

**PENALTY PAGE**

**CASE STYLE: UNITED STATES v. ALEXANDER LEO RODGERS**

**DEFENDANT: ALEXANDER LEO RODGERS (ALL COUNTS)**

**USAO&NO.: 19R00516**

**AUSA: Alex F. Lankford, IV**

**CODE VIOLATIONS:**

**COUNT 1: 18 USC § 1349, Conspiracy to Commit Wire Fraud**

**COUNTS 2-3: 18 USC § 1343, Wire Fraud**

**COUNTS 4-6: 18 USC § 641, Theft of Government Money**

**PENALTIES:**

**COUNTS 1-3: 20 yrs/\$250,000/3 yrs SRT/\$100 SA**

**COUNTS 4-6: 10 yrs/\$250,000/3 yrs SRT/\$100 SA**

**FORFEITURE NOTICE**