

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - -X
:
UNITED STATES OF AMERICA :
: INFORMATION
- v - :
: 18 Cr. _____
ROBERT GERARDI, :
:
Defendant. :
:
- - - - -X

COUNT ONE

(Theft Concerning Program Receiving Federal Funds)

The United States Attorney charges:

BACKGROUND

1. Unless stated otherwise, at all times relevant to this Information:

a. The Putnam Engine and Hose Company No. 2, Inc. ("Putnam Engine and Hose") was located in Port Chester, New York and was a unit of the Port Chester Volunteer Fire Department ("PCVFD"). Putnam Engine and Hose, along with other units of the PCVFD, provided fire protection service within the Village of Port Chester (the "Village").

b. Under the Village's Charter and New York's Village Law, the PCVFD was administered by the Village's Board of Trustees.

c. The Village received a total of \$386,419 in Federal aid into its General Fund and its Capital Projects Fund

for the Fiscal year ending May 31, 2017.

d. ROBERT GERARDI, the defendant, was a resident of the Village and was a member of Putnam Engine and Hose. In or about October 2016, GERARDI was elected to the position of Treasurer of Putnam Engine and Hose. At that time, GERARDI was given authority over bank accounts held by Putnam Engine and Hose.

THE EMBEZZLEMENT SCHEME

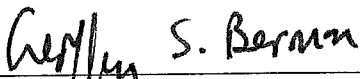
2. From in or about November 2016 to in or about May 2017, ROBERT GERARDI, the defendant, embezzled money from Putnam Engine and Hose by making withdrawals and converting the funds to his personal use and by charging personal expenses to a debit card associated with accounts held by Putnam Engine and Hose. GERARDI made the material misstatement to the president of Putnam Engine and Hose that the missing funds had been stolen from the accounts.

3. ROBERT MICHAEL GARCIA, the defendant, embezzled \$38,236.99 from Putnam Engine and Hose through approximately 28 fraudulent transactions in the manner described above.

4. From in or about November 2016 to in or about May 2017, in the Southern District of New York and elsewhere, ROBERT GERARDI, the defendant, being an agent of Putnam Engine and Hose, an agency of the Village, a local government, which

received, in a one year period, benefits in excess of \$10,000 under a Federal program involving a grant, contract, subsidy, loan, guarantee, insurance, and other form of Federal assistance, did embezzle, steal, obtain by fraud, and otherwise without authority knowingly convert to the use of another person other than the rightful owner and intentionally misapplied, property that was valued at \$5,000 and more, and was owned by, and was under the care, custody, and control of Putnam Engine and Hose, to wit, GERARDI embezzled \$38,236.99 from Putnam Engine and Hose in the manner described above.

(Title 18, United States Code, Sections 666(a)(1)(A) & 2.)



GEOFFREY S. BERMAN
United States Attorney

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(In violation of Title 18, United States Code,
Sections 666 & 2)

GEOFFREY S. BERMAN

United States Attorney