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UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Criminal No. 26-346

v. :

RICHARD EISLER : 18 U.S.C. § 656
18 U.S.C. § 1956(a)(1)(B)(i)
18 U.S.C. § 1957(a)
26 U.S.C. § 7201
18 USC 1512

J. A.C.

INDICTMENT

The Grand Jury in and for the District of New Jersey, sitting at Camden, charges:

COUNT 1
[18 U.S.C. § 656 –Embezzlement by Bank Agent]

The Defendant and Other Entities or Organizations

1. At all times relevant to this Indictment:

a. Defendant RICHARD EISLER was resident of Clementon, New Jersey, and a member of the New Jersey Army National Guard. Starting in 2018, defendant EISLER worked for Erigere Rapidus Solutions, Inc. ("ERS") as a part-time security guard. In early 2020, defendant EISLER became Deputy Director of ERS and had access to ERS's vault.

b. Robert Cormier, who is charged elsewhere, was a resident of Barrington, New Jersey, and was the owner and Chief Operating Officer of ERS.

c. ERS was a security business located in Westville, New Jersey. As part of ERS's business, it had an agreement with a community bank, Bank 1, to collect, deliver, transport, and count currency on behalf of certain customers of Bank 1, including business customers and check cashing agencies. This agreement was documented in a written "Transit Security Services Consulting & Service Agreement." As part of its agreement with Bank 1, ERS stored Bank 1's currency, including cash, in ERS's vault. ERS also packaged the currency and made deposits of the currency at the Federal Reserve Bank in Philadelphia, Pennsylvania, on behalf of Bank 1. In this capacity, and pursuant to the agreement between ERS and Bank 1, ERS and its employees were agents of Bank 1.

d. Bank 1 and Bank 2 were "financial institutions" within the meaning of Title 18, United States Code, Section 20, engaged in interstate commerce and insured by the Federal Deposit Insurance Corporation.

e. Individual 1 owned a contracting business in Pennsylvania. At various times, Individual 1's contracting business provided services at defendant RICHARD EISLER's and Robert Cormier's residences.

f. Individual 2 owned a tree trimming business and provided services at defendant RICHARD EISLER's residence.

2. Starting in late 2019, and pursuant to the agreement between ERS and Bank 1, ERS collected, counted, transported, stored, and deposited cash for Bank 1. ERS's employees, including defendant RICHARD EISLER, were responsible for picking up cash from various Bank 1 customers, counting the cash at ERS's office, and providing accurate daily reports of the cash to Bank 1. These reports were supposed to reflect accurately the cash that ERS had collected on behalf of Bank 1.

Bank 1 relied on the reports from ERS to appropriately credit the relevant customers' accounts for the cash that had been collected by ERS on behalf of Bank 1.

3. After picking up the cash from Bank 1's customers, ERS stored the cash in a vault at ERS's office in New Jersey, until it could be deposited in the Federal Reserve Bank on behalf of Bank 1. ERS, including Robert Cormier, was required to provide Bank 1 with accurate information about the daily balance of cash in ERS's vault, including the details of Bank 1's cash transactions coming in and out of ERS, the denominations of each of the transactions, and the ending balance of Bank 1's cash that was being stored by ERS.

4. ERS regularly packaged the cash that was stored in its vault, on behalf of Bank 1, in bank bands and then transported that cash to the Federal Reserve Bank in Philadelphia, Pennsylvania for deposit on behalf of Bank 1.

5. ERS and its employees were agents of Bank 1. As the owner of ERS, Robert Cormier was responsible for providing accurate information to Bank 1 about the amount of cash contained in ERS's vault, on behalf of Bank 1, as well as the dates and times for the deposits of Bank 1's funds at the Federal Reserve Bank in Philadelphia.

6. From in or about March 2019 through in or about September 2022, ERS collected, counted, stored, transported, and deposited millions of dollars in cash for Bank 1. On a daily basis, ERS stored cash in its vault, on behalf of Bank 1, in varying amounts ranging from $1 to $12 million.

7. Beginning in 2020 and continuing until late 2021, defendant RICHARD EISLER took various amounts of cash belonging to Bank 1 out of ERS's vault without authorization by Bank 1. Defendant EISLER embezzled and stole at least approximately $2,082,038 of this money.

8. Defendant RICHARD EISLER used the embezzled funds to:

a. Pay personal expenses for himself and family members;.

b. Deposit cash into his personal account, joint accounts, or his family members' accounts at Bank 2. At times, the funds that were deposited into defendant EISLER's family members' accounts were then transferred into defendant EISLER's own accounts.

c. Purchase luxury vehicles, such as an Audi RS7, Audi R8, a Porsche 911, Ford F450 truck, Dodge Durango, a Harley Davidson motorcycle, and a recreational vehicle. Defendant EISLER also used the funds to pay for his wedding rings, wedding reception, and a roof on his residence and to pay off an automobile loan.

d. Provide loans to several individuals. Defendant RICHARD EISLER also provided cash to individuals and asked them to provide him in exchange with business checks which, at times, he deposited into accounts at Bank 2 that he controlled or were controlled by family members.

9. From in or about January 2020 through in or about November 2021, in Camden County, in the District of New Jersey and elsewhere, the defendant,

RICHARD EISLER,

being an agent of and connected to Bank 1, the deposits of which were and are insured by the Federal Deposit Insurance Corporation, with intent to injure and defraud Bank 1, embezzled, abstracted, purloined, and willfully misapplied more than $1,000 of the moneys, funds, and credits of Bank 1, and the moneys, funds, and assets that were intrusted to the custody and care of the defendant and Bank 1.

In violation of Title 18, United States Code, Section 656.

COUNTS 2 through 10
[18 U.S.C. § 1956(a)(1)(B)(i) – Money Laundering - Concealment]

1. Paragraphs 1 through 8 of Count 1 of the Indictment are incorporated as if set forth in full herein.

2. On or about the dates set forth below, in the District of New Jersey, and elsewhere, the defendant,

RICHARD EISLER,

did knowingly conduct, attempt to conduct, and aided and abetted the conducting of, the following financial transactions affecting interstate commerce, which involved the proceeds of specified unlawful activity, that is, embezzlement by bank agent, contrary to Title 18, United States Code, Section 656, knowing that the transactions were designed in whole and in part to conceal and disguise, the nature, location, source, ownership, and control of the proceeds of the specified unlawful activity and that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, each such transaction set forth more fully below constituting a separate count of this Indictment:

Count	Date	Amount	Description of Monetary Transaction
2	July 12, 2021	$95,000	Check issued from Individual 1's business bank account, in exchange for cash, which was deposited into EISLER's Bank 2 account.
3	September 5, 2021	$33,000	Check issued from Individual 1's business bank account for "supply," in exchange for cash, which was deposited into EISLER's Bank 2 account.
4	October 11, 2021	$35,000	Check issued from Individual 1's business bank account for "supply," in exchange for

			cash, which was deposited into EISLER's Bank 2 account.
5	October 20, 2021	$30,000	Check to EISLER from Individual 2, repaying $100,000 cash loan from EISLER, which was deposited into EISLER's Bank 2 account.
6	October 28, 2021	$50,000	EISLER caused Individual 1 to issue a check to a third-party's business from Individual 1's business bank account, because third-party would not accept cash payments from Eisler to pay for work on his car and the third-party business deposited Individual 1's check.
7	November 17, 2021	$20,000	Check issued to a third-party's business from an account associated with Individual 2, which EISLER used to pay for repair and service on his vehicle.
8	March 12, 2022	$10,000	Check to a member of EISLER's family from an account associated with Individual 2, repaying $100,000 cash loan from EISLER, and the check was deposited into a joint bank account that EISLER controlled at Bank 2.
9	April 23, 2022	$15,000	Blank check from Individual 2 repaying $100,000 cash loan, which was endorsed by EISLER's family member, and which was negotiated at Bank 2.
10	May 20, 2022	$33,500	Check from Individual 2 repaying $100,000 cash loan, made out to EISLER's family member, which was negotiated at Bank 2.

In violation of Title 18, United States Code, Sections 1956(a)(1)(B)(i) and 2.

COUNTS 11 through 16

[18 U.S.C. § 1957(a) – Money Laundering – Transacting in Criminal Proceeds]

1. Paragraphs 1 through 8 of Count 1 of the Indictment are incorporated as if set forth in full herein.

2. On or about the dates listed below, in the District of New Jersey, and elsewhere, the defendant,

RICHARD EISLER,

did knowingly engage in, and attempt to engage in, and aided and abetted the engaging in, the monetary transactions specified below, by, through, and to a financial institution, in and affecting interstate and foreign commerce, in criminally derived property of a value greater than $10,000, such property having been derived from a specified unlawful activity, namely, embezzlement by bank agent, contrary to Title 18, United States Code, Section 656.

Count	Date	Amount	Monetary Transaction
11	July 20, 2021	$35,000	Cash down payment on a $140,000 Audi RS7 automobile.
12	July 27, 2021	$50,000	Cash down payment on a new $150,000 Audi S8 automobile.
13	October 19, 2021	$30,000	Cash deposit into EISLER's Bank 2 account.
14	December 2021	$35,000	Cash purchase of a Mitsubishi Lancer.
15	November 2021	$86,000	Cash purchase of a Nissan ~~GRT~~. GTR R A.C.
16	December 8, 2021	$100,000	Deposit of two checks from auto dealer, which were the proceeds of the sale of Mitsubishi Lancer and Nissan ~~GRT~~ GTR, into joint bank account that EISLER controlled at Bank 2. R A.C.

In violation of Title 18, United States Code, Section 1957(a) and Title 18, United States Code, Section 2.

COUNT 17
[26 U.S.C. § 7201 – Income Tax Evasion]

1. Paragraphs 1 through 8 of Count 1 of the Indictment are incorporated as if set forth in full herein.

2. At all times relevant to this Indictment:

a. The Internal Revenue Service ("IRS") was a constituent agency of the United States Department of Treasury and part of the Executive Branch of the Government responsible for administering and enforcing the tax laws of the United States and collecting taxes owed to the Treasury of the United States, and providing refunds of taxes overpaid.

b. Generally, individuals were required by law to prepare and file income tax returns with the IRS by April 15 of the year following the year when the income was earned unless an extension was granted. If those income tax returns showed that income taxes were due and owing, then the taxpayer was obligated by law to pay that sum of money to the IRS.

3. For calendar year 2020, defendant RICHARD EISLER filed a personal income tax return, U.S. Individual Income Tax Return, Form 1040, with the IRS, on behalf of himself. The only income reported on that return was Form W-2 income from defendant EISLER's job with the New Jersey National Guard which reported taxable income in the amount of $44,501.

4. Defendant EISLER failed to report to the IRS the approximately $256,645 of income that he received in 2020 through his embezzlement by a bank agent, as described in Count 1, on his U.S. Individual Income Tax Return, Form 1040.

As a result, defendant EISLER had an additional tax due and owing of $72,198 for tax year 2020.

5. On or about July 12, 2021, in the District of New Jersey and elsewhere, the defendant,

RICHARD EISLER,

did willfully attempt to evade and defeat a substantial part of the income tax due and owing to the United States for 2020, by reporting only his W-2 wages on his U.S. Individual Income Tax Return, Form 1040. Defendant EISLER failed to report the cash that he embezzled from ~~Company 1~~ ERS, which defendant EISLER had deposited, and caused to be deposited, into his bank accounts and those of his family members, and which he used to pay personal expenses, thereby concealing and attempting to conceal from the IRS his true and correct income. As a result of such additional taxable income, there was addition tax of approximately $72,198 due and owing to the United States.

A. C.

In violation of Title 26, United States Code, Section 7201.

COUNTS 18 and 19
[26 U.S.C. § 7201 – Income Tax Evasion]

1. Paragraphs 1 through 8 of Count 1 and paragraph 2 of Count 17 of the Indictment are incorporated as if set forth in full herein.

2. For calendar years 2021 and 2022, defendant RICHARD EISLER failed to file personal income tax returns with the IRS.

3. For the year 2021, defendant RICHARD EISLER did not report to the IRS the wages he received from the New Jersey Army National Guard of approximately $21,321, and he also did not report to the IRS the approximately $1,541,052 of income that he received through the embezzlement by a bank agent scheme, as described in Count 1, on his U.S. Individual Income Tax Return, Form 1040. As a result, defendant EISLER had an additional tax due and owing of $536,433 for tax year 2021.

4. For the year 2022, defendant RICHARD EISLER did not report to the IRS the wages he received from the New Jersey Army National Guard of approximately $39,014, and he also did not report to the IRS the approximately $275,570 of income that he received through his embezzlement by a bank agent scheme, as described in Count 1, on his U.S. Individual Income Tax Return, Form 1040. As a result, defendant EISLER had an additional tax due and owing of $78,352.

5. On or about the tax year filing dates set forth below, in Camden County, in the District of New Jersey, and elsewhere, the defendant,

RICHARD EISLER,

did knowingly and willfully attempt to evade and defeat a substantial part of the income tax due and owing by him to the United States for the calendar years listed below by: (1) failing to make an income tax return on or about April 15, of the years listed below, as required by law, to any proper officer of the IRS; (2) failing to pay to the IRS the income tax due, as listed below; and (3) depositing, and causing to be deposited, into his own bank accounts and the bank accounts of his family members, funds that defendant EISLER had embezzled from ERS ~~Company 1,~~ and which defendant EISLER had used to pay personal expenses; each calendar year constituting a separate count of this Indictment:

JR A.C.

Count	Tax Year	Tax Year Filing Date	Approximate Undeclared Taxable Income	Approximate Tax Due
18	2021	April 15, 2022	$1,549,823	$536,433
19	2022	April 15, 2023	$301,634	$78,352

In violation of Title 26, United States Code, Section 7201.

COUNT 20
[18 U.S.C. § 1512(b)(3) – Witness Tampering]

1. Paragraphs 1 through 8 of Count 1of the Indictment are realleged and incorporated as if set forth in full herein.

2. At all times relevant to this Indictment:

a. The Federal Bureau of Investigation ("FBI") was the law enforcement component of the United States Department of Justice that had authority to investigate and enforce criminal laws relating to, among other things, bank fraud, bank embezzlement, and money laundering.

b. The Internal Revenue Service, Criminal Investigation ("IRS-CI") was an agency of the United States Department of Treasury. IRS-CI had authority to investigate and enforce criminal laws relating to federal income taxes and money laundering.

c. Since in or about October 2022, FBI and IRS-CI Special Agents have been conducting an investigation into the bank embezzlement, money laundering and tax-related offenses described in this Indictment.

3. On or about July 9, 2023, defendant RICHARD EISLER contacted Individual 3 and advised Individual 2 to lie to the FBI and IRS-CI Special Agents if Individual 3 was interviewed. Specifically, defendant EISLER instructed Individual 3 to tell the agents that the two checks Individual 3 had paid to defendant EISLER were for loans that Individual 3 gave to defendant EISLER, which was false. A.C

A.C.

4. On or about July 13, 2023, FBI and IRS-CI Special Agents interviewed defendant RICHARD EISLER and asked him about his relationship with Individual

3. During this interview, the Special Agents showed defendant EISLER certain checks that were deposited into bank accounts that he controlled or that were controlled by defendant EISLER's family members. Defendant EISLER falsely told the Special Agents that the checks represented loans that Individual ~~8~~ 2 had given to defendant EISLER. Defendant EISLER further explained that although defendant EISLER had paid back only a small portion of these purported loans, Individual ~~8~~ 2 continued to give defendant EISLER additional loans in the form of additional checks, an explanation that was false.

2 A.L

2 A.L

5. On or about July 9, 2023, in the District of New Jersey and elsewhere, the defendant,

RICHARD EISLER,

did knowingly and corruptly persuade, and attempt to corruptly persuade, another, namely, Individual 2 with the intent to hinder, delay, and prevent the communication to a law enforcement officer of the United States, that is Special Agents with the FBI and IRS-CI, of information, that is the source and nature of the checks written by Individual 2 to defendant EISLER, relating to the commission and possible commission of a federal offense.

2 A.L

2 A.L

In violation of Title 18, United States Code, Section 1512(b)(3).

FORFEITURE ALLEGATION AS TO COUNT 1

Upon conviction of the offense in violation of Title 18, United States Code, Section 656, as alleged in Count 1 of this Indictment, the defendant, RICHARD EISLER, shall forfeit to the United States, pursuant to 18 U.S.C. § 982(a)(2), all property, real or personal, constituting or derived from proceeds traceable to the offense charged in Count 1 of this Indictment.

FORFEITURE ALLEGATION AS TO COUNTS 2 through 10

Upon conviction of the offenses in violation of Title 18, United States Code, Sections 1956 alleged in Counts 2 through 10 of this Indictment, the defendant, RICHARD EISLER, shall forfeit to the United States, pursuant to 18 U.S.C. § 981(a)(1)(C), all property, real and personal, involved in the money laundering offenses, and all property traceable to the offenses charged in Counts 2 through 10.

FORFEITURE ALLEGATION AS TO COUNTS 11 through 16

Upon conviction of the offenses in violation of Title 18, United States Code, Section 1957 alleged in Counts 11 through 16 of this Indictment, the defendant, RICHARD EISLER, shall forfeit to the United States, pursuant to 18 U.S.C. § 981(a)(1)(c), all property, real or personal, constituting or derived from proceeds traceable to the offenses charged in Counts 11 through 16 of this Indictment.

SUBSTITUTE ASSETS PROVISION
(Applicable to All Forfeiture Allegations)

If any of the property described above, as a result 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 shall be entitled, pursuant to 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. § 982(b) and 28 U.S.C. § 2461(c), to forfeiture of any other property of the defendants up to the value of the above-described forfeitable property.

A TRUE BILL

FOREPERSON

ROBERT FRAZER
United States Attorney

JASON M. RICHARDSON
Assistant United States Attorney

Approved:

R. DAVID WALK, Jr.
Deputy United States Attorney

CASE NUMBER: 26-

United States District Court
District of New Jersey

UNITED STATES OF AMERICA
v.
RICHARD EISLER

INDICTMENT FOR
18 U.S.C. § 656
18 U.S.C. § 1956(a)(1)(B)(i)
18 U.S.C. § 1957(a)
26 U.S.C. § 7201
18 U.S.C. § 1512(b)(3)

A TRUE BILL,

FOREPERSON

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