

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

9/14/2020

David J. Bradley, Clerk of Court

UNITED STATES OF AMERICA	§	
	§	CRIMINAL NO. 20-456
v.	§	
	§	Count 1: 18 U.S.C. § 1343
ROBERT ANDREW BISHOP,	§	(Wire Fraud)
Defendant.	§	

CRIMINAL INFORMATION

THE UNITED STATES ATTORNEY CHARGES:

COUNT ONE

Wire Fraud

18 U.S.C. § 1343

From on or about January 9, 2019, within the Southern District of Texas,

ROBERT ANDREW BISHOP,

did knowingly devise and intend to devise a scheme and artifice to defraud Independent Professional Management, LLC (IPM) by means of materially false and fraudulent pretenses and representations, namely by causing Gulf Coast Bank, located in Louisiana, to complete a wire transfer of money funds to IPM in Houston Texas that he then converted to his own use by submitting a falsified "Borrowing Base Report" indicating that IPM had \$3,888,237.22 in accounts receivable when in fact IPM had \$2,822,065.46 in accounts receivable, causing these funds to be transmitted from Gulf Coast Bank's computer servers in Louisiana to IPM's bank accounts and computer servers located in Houston, Texas, in interstate commerce in furtherance of executing the scheme .

In violation of Title 18, United States Code, Section 1343.

NOTICE OF CRIMINAL FORFEITURE

(18 U.S.C. § 982(a)(7); 18 U.S.C. § 981(a)(1)(C))

Pursuant to Title 18, United States Code, Section 982(a)(7), the United States gives notice that upon Defendant's conviction of any wire fraud offense charged in this Information, the United States will seek forfeiture of all property, real or personal, that constitutes or is derived, directly or indirectly, from gross proceeds traceable to the commission of such offenses.

Pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), the United States gives notice that upon Defendant's conviction of any wire fraud offenses charged in this Indictment, the United States intends to seek forfeiture of all property, real or personal, which constitutes or is derived from proceeds traceable to such offenses.

MONEY JUDGMENT AND SUBSTITUTE ASSETS

The United States gives notice that it will seek a money judgment against the Defendant. In the event that one or more conditions listed in Title 21, United States Code, Section 853(p) exist, the United States will seek to forfeit any other property of the Defendant up to the amount of the money judgment.

RYAN K. PATRICK
United States Attorney

By: Thomas H. Carter
Thomas Heyward Carter
Assistant United States Attorney
713-567-9470

AO 455 (Rev. 1/09) Waiver of an Indictment

UNITED STATES DISTRICT COURT

for the

Southern

DISTRICT OF

Texas

United States of America
v.

ROBERT ANDREW BISHOP

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Case No: 20-456

WAIVER OF INDICTMENT

I understand that I have been accused of one or more offenses punishable by imprisonment for more than one year. I was advised in open court of my rights and the nature of the proposed charges against me.

After receiving this advice, I waive my right to prosecution by indictment and consent to prosecution by information.

Date: _____

Defendant's signature

Signature of defendant's attorney

Printed name of defendant's attorney

Judge's signature

Judge's printed name and title