

UNITED STATES DISTRICT COURT  
DISTRICT OF CONNECTICUT

UNITED STATES OF AMERICA :

v. : CRIMINAL NO. \_\_\_\_\_

WILLIAM WHITE, : VIOLATIONS:  
ROBERT JACOBS, : Conspiracy  
PAUL JACOBS, and : (18 U.S.C. § 371);  
PHILIP JACOBS : Bribery Concerning Programs Receiving  
Federal Funds  
: (18 U.S.C. § 666);  
Mail Fraud/Theft of Honest Services  
: (18 U.S.C. §§ 1341 & 1346)

INDICTMENT

The Grand Jury Charges:

**Count One – Conspiracy To Commit Theft/Bribery**  
**Concerning Programs Receiving Federal Funds**

(18 U.S.C. §§ 371, 2)

(William White, Robert Jacobs, Paul Jacobs, and Philip Jacobs)

1. At all times relevant to this Indictment, the New Haven Department of Police Services (“New Haven Police Department”) was a government agency of the City of New Haven, as defined by Title 18, United States Code, Section 666(d). The mission of the New Haven Police Department is to provide pro-active community police services to the public by furthering the partnership with its community to protect life and property, prevent crime and resolve problems.

2. At all times relevant to this Indictment, the New Haven Police Department received benefits in excess of \$10,000 under federal programs involving grants, contracts, subsidies, loans, guarantees, insurance, and other forms of federal assistance in a one year period.

3. At all times relevant to this Indictment, defendant WILLIAM B. WHITE (“WHITE”), a resident of New Haven, Connecticut, was a member of the New Haven Police Department. On or about May 9, 1995, defendant WHITE was promoted to the position of Lieutenant, and from

approximately June 15, 2003 to March 13, 2007 was the Supervisor of the Narcotics Enforcement Unit within the New Haven Police Department. As a police officer for the City of New Haven, defendant WHITE owed a duty of loyalty and honest services to the City of New Haven and its citizens in the performance of his public duties, free from deceit, favoritism, bias, conflict of interest, and self-enrichment.

4. As Supervisor of the Narcotics Enforcement Unit, defendant WHITE, at various times, supervised approximately 5 New Haven police detectives.

5. At all times relevant to this Indictment, defendant WHITE was an “agent” of “local government” as those terms are defined by Title 18, United States Code, Sections 666(d)(1) and 666(d)(3).

6. At all times relevant to this Indictment, a State law enforcement officer (hereinafter undercover employee “UCE”) was an “agent” of “State government” as those terms are defined by Title 18, United States Code, Sections 666(d)(1) and 666(d)(3).

7. At all times relevant to this Indictment, a State agency for which the UCE worked (“State Agency”) received benefits in excess of \$10,000 under federal programs involving grants, contracts, subsidies, loans, guarantees, insurance, and other forms of federal assistance in a one year period.

8. At all times relevant to this Indictment, defendant ROBERT JACOBS, a resident of Branford, Connecticut, was a bail bondsman and associated with Jacobs Bail Bonds in New Haven, Connecticut.

9. At all times relevant to this Indictment, defendant PAUL JACOBS, a resident of Woodbridge, Connecticut, was a bail bondsman and associated with Paul Jacobs Bail Bonds in New Haven, Connecticut.

10. At all times relevant to this Indictment, defendant PHILIP JACOBS, a resident of Woodbridge, Connecticut, was a bail bondsman and associated with Jacobs Bail Bonds in New Haven, Connecticut.

11. As bail bondsmen, defendants ROBERT JACOBS, PAUL JACOBS, and PHILIP JACOBS (“The JACOBS”) charged fees to post bonds for persons arrested in Connecticut. As part of the bond system and for bonds over a certain amount, the JACOBS were responsible to pay to the State of Connecticut at least 50% of the bond posted if the person failed to appear in a Connecticut state court as required.

### **The Conspiracy**

12. Between 2002 and March 2007, approximately, in the District of Connecticut and elsewhere, defendants, WHITE, ROBERT JACOBS, PAUL JACOBS, PHILIP JACOBS and other individuals, known and unknown to the Grand Jury, did unlawfully, willfully and knowingly conspire, combine, confederate and agree together and with each other to commit certain offenses against the United States of America as follows:

(a) For defendant WHITE and others, known and unknown to the Grand Jury, to knowingly, willfully and corruptly solicit and agree to accept things of value from defendants ROBERT JACOBS, PAUL JACOBS, and PHILIP JACOBS, intending to be influenced and rewarded in connection with the business, transactions and series of transactions of the New

Haven Police Department involving a thing of value of \$5,000 or more, in violation of Title 18, United States Code, §§ 666(a)(1)(B) and 2.

(b) For defendants ROBERT JACOBS, PAUL JACOBS, and PHILIP JACOBS to knowingly, willfully and corruptly give, offer, and agree to give things of value to defendant WHITE, the UCE, and others, known and unknown to the Grand Jury, with the intent to influence and reward agents of local and State government in connection with the business, transactions and series of transactions of the New Haven Police Department and State Agency, involving a thing of value of \$5,000 or more, in violation of Title 18, United States Code, §§ 666(a)(2) and 2.

**Manner And Means Of The Conspiracy**

13. It was part of the manner and means of the defendants WHITE, ROBERT JACOBS, PAUL JACOBS, and PHILIP JACOBS, as well as others, that:

14. Defendants ROBERT JACOBS, PAUL JACOBS, and PHILIP JACOBS, as well as others, agreed to pay bribes, rewards and gratuities to defendant WHITE, the UCE and others, for, because of, and in consideration for favorable and preferential treatment in connection with official business of the New Haven Police Department and the State Agency, that is cash payments to defendant WHITE and the UCE in return for locating and apprehending persons who failed to appear (“fugitives”) for cases in which the JACOBS had posted a bond and therefore stood to suffer financially.

15. Defendant WHITE and others received things of value, including but not limited to cash payments, for locating and apprehending fugitives, from defendants ROBERT JACOBS, PAUL JACOBS, and PHILIP JACOBS while defendant WHITE and others knew that such

benefits were provided with the intent to influence and reward defendant WHITE and others in the performance of official acts.

16. Defendant WHITE used his official position to provide preferential treatment to, as well as to perform, direct and authorize official actions, that is locating and arresting fugitives, and aiding and abetting other law enforcement officers in locating and arresting fugitives, to benefit the financial interests of, defendants ROBERT JACOBS, PAUL JACOBS, and PHILIP JACOBS, and other individuals and businesses.

17. Defendants WHITE, ROBERT JACOBS, PAUL JACOBS and PHILIP JACOBS concealed the payments of bribes and gratuities by insuring that ultimately the payments were made in cash and by intentionally not creating any paper trail of payments to law enforcement officers.

#### Overt Acts

18. In furtherance of the conspiracy, and to effect the objects thereof, defendants WHITE, ROBERT JACOBS, PAUL JACOBS, PHILIP JACOBS, and others, known and unknown to the Grand Jury, committed and caused others to commit the following overt acts, among others, in the District of Connecticut and elsewhere:

- a. On or about July 24, 2006, defendant ROBERT JACOBS provided information about fugitive (hereinafter referred to as fugitive LM) with the UCE.
- b. In or about July 2006, defendant ROBERT JACOBS agreed to pay defendant WHITE and the UCE approximately \$10,000 to locate a fugitive (referred to as fugitive AW).
- c. Between in or about August 4 and August 11, 2006, defendant ROBERT JACOBS paid defendant WHITE approximately \$10,000 in cash in return for the arrest of fugitive AW.
- d. Between on or about August 4 and August 11, 2006, defendant WHITE split the money for fugitive AW with the UCE.

- e. On or about August 3, 2006, defendant PAUL JACOBS sent information by facsimile to the UCE regarding a fugitive (hereinafter referred to as fugitive WD) and agreed to pay \$10,000 for the apprehension of fugitive WD.
- f. On or about September 15, 2006, defendant WHITE traveled to defendant ROBERT JACOBS' Office in New Haven, Connecticut and picked up an envelope that contained payment for the apprehension of fugitive WD, that is \$3500 in cash and a check in the amount of \$9500 signed by defendant PAUL JACOBS.
- g. On or about September 18, 2006, defendant ROBERT JACOBS substituted \$9500 in cash for the \$9500 check to avoid leaving any sort of paper trail.
- h. In December 2006 and January 2007, defendant WHITE attempted to locate a fugitive (hereinafter referred to as RJ) in return for a payment of approximately \$10,000.
- i. On or about January 16, 2007, defendant WHITE, with other law enforcement officers, arrested a fugitive for whom defendant PHILIP JACOBS had posted a bond (hereinafter referred to as fugitive FL) in return for which defendant ROBERT JACOBS agreed to pay \$1200.
- j. On or about January 17, 2007, defendant WHITE and the UCE picked up cash totaling \$1400 for the arrest of FL, which cash the defendant ROBERT JACOBS had left at his office on Orange Street in New Haven, Connecticut.
- k. On or about March 3, 2007, defendant PHILIP JACOBS provided the UCE with three fugitive files and explained that he would pay for the apprehension of the fugitives.
- l. On or about March 12, 2007, defendant PHILIP JACOBS again discussed payment with the UCE for a fugitive and acknowledged that the payment would be in cash so as not to leave a trail.

All in violation of Title 18, United States Code Sections 371 and 2.

**Count Two - Theft/Bribery Concerning Programs Receiving Federal Funds**

(18 U.S.C. §§ 666(a)(2) and 2)

(Robert Jacobs)

1. Paragraphs One through Eleven of Count One are realleged and incorporated by reference as though fully set forth herein.
2. Between in or about January 2006 and August 2006, approximately, in the District of Connecticut and elsewhere, defendant ROBERT JACOBS together with others, known and

unknown to the Grand Jury, knowingly, willfully and corruptly gave, offered, and agreed to give a thing of value, that is cash in the amount of \$10,000, to defendant WHITE and the UCE, with the intent to influence and reward agents of local government, defendant WHITE, and State government, the UCE, in connection with the business, transaction and series of such transactions of the New Haven Police Department and the State Agency, involving a thing of value of \$5,000 or more, that is the apprehension of fugitive AW.

All in violation of Title 18, United States Code, Sections 666(a)(2) and 2.

**Count Three -Theft/Bribery Concerning Programs Receiving Federal Funds**

**(18 U.S.C. §§ 666(a)(2) and 2)**

**(Robert Jacobs and Paul Jacobs)**

1. Paragraphs One through Eleven of Count One are realleged and incorporated by reference as though fully set forth herein.

2. Between in or about June 2006 and September 2006, approximately, in the District of Connecticut and elsewhere, defendants ROBERT JACOBS and PAUL JACOBS, together and with others, known and unknown to the Grand Jury, knowingly, willfully and corruptly gave, offered, and agreed to give a thing of value, that is cash, to defendant WHITE and the UCE, with the intent to influence and reward agents of local government, defendant WHITE, and State government, the UCE, in connection with the business, transaction and series of such transactions of the New Haven Police Department and State Agency, involving a thing of value of \$5,000 or more, that is the apprehension of fugitive WD.

All in violation of Title 18, United States Code, §§ 666(a)(2) and 2.

**Count Four - Theft/Bribery Concerning Programs Receiving Federal Funds**

**(18 U.S.C. §§ 666(a)(1)(B) and 2)**

**(William White)**

1. Paragraphs One through Eleven of Count One are realleged and incorporated by reference as though fully set forth herein.

2. Between in or about November 2006 and January 2007, approximately, in the District of Connecticut and elsewhere, defendant WHITE and others, known and unknown to the Grand Jury, knowingly, willfully and corruptly solicited, demanded, accepted and agreed to accept a thing of value, that is cash in the amount of \$1400, intending to be influenced and rewarded in connection with the business, transaction, and series of transactions of the New Haven Police Department involving a thing of value of \$5,000 or more, that is the apprehension of fugitive FL.

All in violation of Title 18, United States Code, §§ 666(a)(1)(B) and 2.

**Count Five -Theft/Bribery Concerning Programs Receiving Federal Funds**

**(18 U.S.C. §§ 666(a)(2) and 2)**

(Robert Jacobs and Philip Jacobs)

1. Paragraphs One through Eleven of Count One are realleged and incorporated by reference as though fully set forth herein.

2. Between in or about November 2006 and January 2007, approximately, in the District of Connecticut and elsewhere, defendants ROBERT JACOBS and PHILIP JACOBS, together with others, known and unknown to the Grand Jury, knowingly, willfully and corruptly gave, offered, and agreed to give a thing of value, that is cash totaling \$1400 to defendant WHITE and the UCE, with the intent to influence and reward agents of local government, defendant WHITE, and State government, the UCE, in connection with the business, transaction and series of such transactions of the New Haven Police Department and State Agency, involving a thing of value of \$5,000 or more, that is the apprehension of fugitive FL.

All in violation of Title 18, United States Code, §§ 666(a)(2) and 2.

**Counts Six-Eight – Mail Fraud/Theft of Honest Services**

(18 U.S.C. §§ 1341, 1346, and 2)

(William White, Robert Jacobs, Paul Jacobs and Philip Jacobs)

1. Paragraphs One through Eleven and Eighteen of Count One are realleged and incorporated by reference as though fully set forth herein.

**The Scheme and Artifice to Defraud**

2. Beginning in approximately 2002 and continuing to about March 2007, in the District of Connecticut and elsewhere, defendants WHITE, ROBERT JACOBS, PAUL JACOBS, and PHILIP JACOBS, and others known and unknown to the Grand Jury, in the District of Connecticut and elsewhere, devised and intended to devise, and participated in, a scheme and artifice to defraud the City of New Haven, the New Haven Police Department and its citizens as well as the State Agency and its citizens of the intangible right to the honest services of defendant WHITE and the UCE, and other officials and employees of the City of New Haven, New Haven Police Department and the State Agency performed free from deceit, favoritism, bias, conflict of interest and self-enrichment, in that the defendants used defendant WHITE's and the UCE's positions as law enforcement officers to enrich themselves in connection with official law enforcement business, with the intent to deceive the City of New Haven, New Haven Police Department and its citizens and the State Agency and its citizens, accompanied by material misrepresentations and omissions.

**Manner and Means of the Scheme**

3. It was part of the manner and means of the defendants WHITE, ROBERT JACOBS, PAUL JACOBS, and PHILIP JACOBS, as well as others, that:

4. Defendants ROBERT JACOBS, PAUL JACOBS, and PHILIP JACOBS, as well as others, agreed to pay bribes, rewards and gratuities to defendant WHITE, the UCE and others, for, because of, and in consideration for favorable and preferential treatment in connection with official business of the New Haven Police Department and the State Agency, that is cash payments to defendant WHITE and the UCE in return for locating and apprehending persons who failed to appear (“fugitives”) for cases in which the JACOBS had posted a bond and therefore stood to suffer financially.

5. Defendant WHITE and others received things of value, including but not limited to cash payments, for locating and apprehending fugitives, from defendants ROBERT JACOBS, PAUL JACOBS, and PHILIP JACOBS while defendant WHITE and others knew that such benefits were provided with the intent to influence and reward defendant WHITE and others in the performance of official acts.

6. Defendant WHITE used his official position to provide preferential treatment to, as well as to perform, direct and authorize official actions, that is locating and arresting fugitives, to benefit the financial interests of, defendants ROBERT JACOBS, PAUL JACOBS, and PHILIP JACOBS, and other individuals and businesses.

7. Defendants WHITE, ROBERT JACOBS, PAUL JACOBS and PHILIP JACOBS concealed the payments of bribes and gratuities by insuring that ultimately the payments were made in cash and by intentionally not creating any paper trail of payments to law enforcement officers.

8. Defendant White used his official position to the detriment of the citizens of New Haven, Connecticut by engaging in acts of self dealing and self enrichment, that is stealing

money belonging to a citizen of New Haven, Connecticut during the execution of a warrant and causing material omissions and misrepresentations in law enforcement reports.

**Use Of the United States Mail**

9. For the purpose of executing and attempting to execute the aforesaid scheme and artifice to defraud, on or about the dates listed below, in the District of Connecticut and elsewhere, defendants WHITE, ROBERT JACOBS, PAUL JACOBS, and PHILIP JACOBS, and others, did knowingly cause to be placed in an authorized depository for mail matter the following:

<u>Count</u>	<u>Date</u>	<u>Use Of United States Mail</u>
6	8/4/06	Weekly Report indicating rearrest of fugitive AW from CT Judicial Branch, Court Operations Division
7	9/22/06	Weekly Report indicating rearrest of fugitive WD from CT Judicial Branch, Court Operations Division
8	1/19/07	Weekly Report indicating rearrest of fugitive FL from CT Judicial Branch, Court Operations Division

All in violation of Title 18, United States Code, Sections 1341, 1346, and 2.

A TRUE BILL

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FOREPERSON

UNITED STATES OF AMERICA

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KEVIN J. O'CONNOR  
UNITED STATES ATTORNEY

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NORA R. DANNEHY  
ASSISTANT UNITED STATES ATTORNEY

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DAVID A. RING  
ASSISTANT UNITED STATES ATTORNEY