

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

FELONY

BILL OF INFORMATION FOR WIRE FRAUD

UNITED STATES OF AMERICA	*	CRIMINAL NO.
v.	*	SECTION:
SUSAN FONTE	*	VIOLATION: 18 U.S.C. § 1343
	* * *	

The United States Attorney charges that:

COUNT 1

A. AT ALL TIMES MATERIAL HEREIN:

1. **SUSAN FONTE**, defendant herein (hereinafter referred to as **FONTE**) was a bookkeeper employed by Tom Bradshaw & Associates in the Eastern District of Louisiana.

2. Tom Bradshaw & Associates was a commercial real estate development firm. Its principal office was located in the Eastern District of Louisiana, where **FONTE** was employed from on or about January 19, 2005, to on or about June 17, 2010.

3. As its bookkeeper, **FONTE** was responsible for opening the firm's correspondence, including most billing and banking information. She routinely paid the firms' bills and made deposits into the firm's operating checking account.

4. As its bookkeeper, **FONTE** was also responsible for periodically depositing checks written on Tom Bradshaw & Associates' operating account into a personal checking account that the owner maintained with Regions Bank.

B. THE SCHEME TO DEFRAUD:

Beginning at a time unknown, but as early as 2006 and continuing through on or about June 14, 2010, in the Eastern District of Louisiana and elsewhere, the defendant, **FONTE**, did falsely and fraudulently devise and intend to devise a scheme and artifice to defraud Tom Bradshaw & Associates by knowingly and fraudulently forging the owner's signature on company checks that she issued to herself.

It was part of the scheme and artifice to defraud Tom Bradshaw & Associates that **FONTE** either cashed each forged check at local banks or deposited them into her personal bank account. During the scheme to defraud, **FONTE** embezzled \$192,538.18 from Tom Bradshaw & Associates' operating account.

It was further part of the scheme and artifice to defraud that **FONTE** withdrew cash from the owner's personal checking account with Regions Bank by using an illegally obtained ATM/debit card that was linked to said account. During this scheme to defraud, **FONTE** illegally withdrew \$95,117.86 from the owner's personal account.

C. USE OF THE WIRES:

On or about June 1, 2010, the defendant, **FONTE**, for the purpose of executing and attempting to execute the scheme and artifice to defraud as described in Part B, did knowingly and willfully cause to be transmitted in interstate commerce certain writings, signs, signals, and sounds by means of wire communication when the defendant, **FONTE**, used a Region's ATM/debit card numbered XXXX XXXX XXXX 1422 to withdraw \$602.50 from an ATM machine in Metairie, Louisiana, which caused a signal, sign, writing, and sound to be transmitted in interstate commerce between Alabama and Louisiana allowing the defendant, **FONTE**, to withdraw \$602.50 in U.S. currency by the use of the falsely and fraudulently obtained Regions ATM/debit card issued to the defendant, **FONTE**; all in violation of Title 18, United States Code, Section 1343.

NOTICE OF FORFEITURE

1. The allegations contained in Count 1 of this bill of information are hereby re-alleged and incorporated by reference as though set forth fully herein for the purpose of alleging forfeiture to the United States of America pursuant to the provisions of Title 18, United States Code, Sections 1343 and 982(a)(2).


2. As a result of the offense alleged in Count 1, the defendant, **FONTE**, shall forfeit to the United States pursuant to Title 18, United States Code, Section 1343 and 982(a)(2) any and all property, real or personal which constitutes or is derived from proceeds obtained directly or indirectly, as a result of a violation of Title 18, United States Code, Section 1343.

3. If any of the property subject to forfeiture pursuant to Paragraph 2 of this notice of forfeiture, as a result of any act or omission of the defendant:


- a. cannot be located upon exercise of due diligence;
- b. has been transferred or sold or deposited with a third person;
- 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 can not be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of said defendant up to the value of the above forfeitable property.

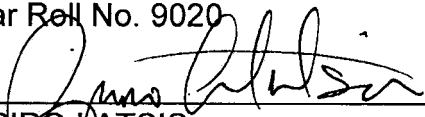
All in violation of Title 18, United States Code, Section 982(a)(2).



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