

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	CRIMINAL NO.
v.	:	DATE FILED
FERNANDO SANCHEZ	:	VIOLATIONS: 18 U.S.C. § 1343 (wire fraud – 3 counts)

INFORMATION

COUNTS ONE THROUGH THREE

THE UNITED STATES ATTORNEY CHARGES THAT:

At all times material to this Information:

1. FERNANDO SANCHEZ was the bank manager at Fulton Bank in Lancaster, Pennsylvania.
2. The Manor Shopping Center Merchants Association (“Merchants Association”) had a bank account at Fulton Bank ending in digits 6944.
3. SANCHEZ had signing authority on the Merchants Association bank account to make transactions for the benefit of the Association.

THE SCHEME

4. From in or about May 2010, through in or about July 2014,

FERNANDO SANCHEZ

devised, and solicited, a scheme to defraud and to obtain money and property by means of false and fraudulent pretenses, representations, and promises.

5. It was part of the scheme that FERNANDO SANCHEZ obtained money from the Merchants Association bank account to pay his own personal expenses when he:
- a. used funds from the Merchants Association account to obtain from Fulton Bank approximately 49 cashier's checks, totaling approximately \$77,585.27, and deposited the cashier's checks in an account ending in the digits 5854 in his name at Belco Credit Union;
 - b. used funds from the Merchants Association account to obtain from Fulton Bank approximately three cashier's check, totaling approximately \$3,351.82 and made payable to the First Bank of Delaware;
 - c. used funds from the Merchants Association account to obtain a cashier's check for approximately \$2,500 from Fulton Bank and made payable to one of his relatives;
 - d. used funds from the Merchants Association account to obtain five cashier's checks totaling approximately \$2,190 that were made payable to Home 2 Home;
 - e. used funds from the Merchants Association account to obtain four cashier's checks totaling approximately \$2,550 and sent to Wells Fargo Bank;
 - f. made an online electronic funds transfer from the Merchants Association account of approximately \$1,111.61 to WFHM Mortgage;
 - g. made an online electronic funds transfer from the Merchants Association for approximately \$4,854.59 to Cardmember Services Credit Card Payment.
 - h. used funds from the Merchants Association account to obtain approximately eleven cashier's checks totaling approximately \$4,261.80 and made payable to stores and vendors who provided services for Sanchez.

6. It was also part of the scheme that defendant FERNANDO SANCHEZ

a. on approximately May 31, 2011, withdrew \$1,328.71 from the Merchants Association account and obtained a cashier's check from Fulton Bank ending in the digits 0378 in the amount of \$1328,71, which he later deposited in his own bank account at Belco Credit Union;

b. on approximately April 3, 2012, withdrew \$1,300.00 from the Merchants Association account and obtained a cashier's check from Fulton Bank ending in the digits 8210 in the amount of \$1,300.00, which he later deposited in his bank account at Belco Credit Union; and,

c. on approximately April 1, 2014, withdrew \$1,100.00 from the Merchants Association account and obtained a cashier's check from Fulton Bank ending in digits 6542 in the amount of \$1,100.00, which he later deposited in his own bank account at Belco Credit Union.

7. Between in or about May 2010 and January 2014, as a result of this fraudulent scheme, Fulton Bank was defrauded of approximately \$99,105.09.

THE WIRE TRANSFERS

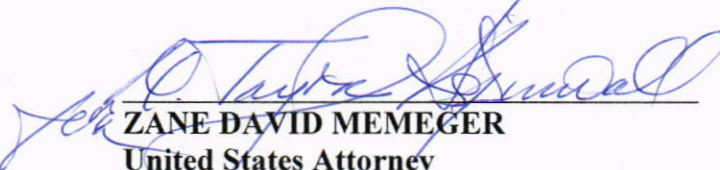
8. On or about each of the dates below, in the Eastern District of Pennsylvania and elsewhere, defendant

FERNANDO SANCHEZ

for the purpose of executing the scheme described above, and attempting to do so, caused to be transmitted by means of wire communications in interstate commerce, through Georgia or other locations outside of Pennsylvania, the signals and sounds described below for each count, each transmission constituting a separate count:

<u>COUNT</u>	<u>DATE</u>	<u>AMOUNT</u>	<u>DESCRIPTION</u>
1	May 31, 2011	\$1,328.71	Wiring from Fulton Bank, Lancaster, Pa, to a Fulton Bank vendor in Georgia
2	April 3, 2012	\$1,300.00	Wiring from Fulton Bank, Lancaster, Pa, to a Fulton Bank vendor in Georgia
3	April 1, 2014	\$1,100.00	Wiring from Fulton Bank, Lancaster, Pa, to a Fulton Bank vendor in Georgia

All in violation of Title 18, United States Code, Section 1343.


ZANE DAVID MEMEGER
 United States Attorney

No. 15-_____

UNITED STATES DISTRICT COURT

Eastern District of Pennsylvania

Criminal Division

THE UNITED STATES OF AMERICA

vs.

FERNANDO SANCHEZ

INFORMATION

Counts
18 U.S.C. § 1343 (wire fraud – 3 counts)

A true bill.

Foreman

Filed in open court this _____ day,
Of _____ A.D. 20 _____

Clerk

Bail, \$ _____
