

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

UNITED STATES OF AMERICA : **CRIMINAL NO.** _____
v. : **DATE FILED:** _____
ERLANDA NARANJO : **VIOLATION:**
: **18 U.S.C. § 1344 (bank fraud – 1 count)**
: **Notice of forfeiture**

INFORMATION

COUNT ONE

(Bank Fraud)

THE UNITED STATES ATTORNEY CHARGES THAT:

1. From 2002 until April 2007, ERLANDA NARANJO worked at Citizens Bank ("the Bank") at one or more branches in Philadelphia, eventually serving as an assistant branch manager.
2. At all times material to this Information, Citizens Bank was a financial institution, the deposits of which were insured by the Federal Deposit Insurance Corporation.
3. From in or about April 2006 until in or about January 2007, in Philadelphia, in the Eastern District of Pennsylvania, defendant

ERLANDA NARANJO

knowingly executed, and attempted to execute, a scheme to defraud Citizens Bank, and to obtain monies owned by and under the care, custody, and control of that bank by means of false and fraudulent pretenses, representations, and promises.

THE SCHEME

4. On or about April 20, 2006, using the personal information of a relative, M.Q., without authorization, defendant ERLANDA NARANJO applied for a business line of credit from the Bank in M.Q.'s name for a fictional business purportedly owned by M.Q.

5. It was part of the scheme that defendant ERLANDA NARANJO, acting alone or with others, supplied the Bank with false tax documents purportedly from the fictional business to support the application for the business line of credit.

6. The Bank approved the application for a business line of credit on or about May 2, 2006, and mailed a congratulatory letter to M.Q. at defendant ERLANDA NARANJO's home address.

7. From the time the line of credit was approved, until in or about January 2007, defendant ERLANDA NARANJO, and others, took advances and incurred charges against the line of credit that were not repaid, causing a loss to the Bank of \$95,807.71.

All in violation of Title 18, United States Code, Section 1344.

NOTICE OF FORFEITURE

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

1. As a result of the violation of Title 18, United States Code, Section 1344, set forth in this Information, defendant

ERLANDA NARANJO

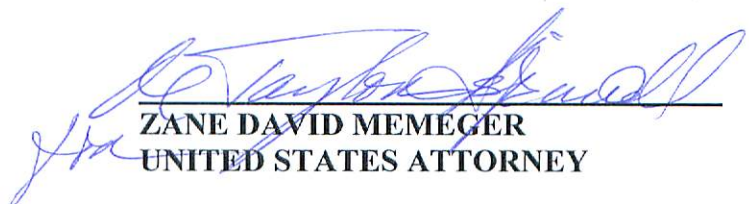
shall forfeit to the United States of America any property that constitutes, or is derived from, proceeds obtained directly or indirectly from the commission of such violation including, but not limited to, the sum of \$95,807.71.

2. If any of the property subject to forfeiture, 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;

it is the intent of the United States, pursuant to Title 18, United States Code, Section 982(b), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property subject to forfeiture.

All pursuant to Title 18, United States Code, Section 982.


ZANE DAVID MEMEGER
UNITED STATES ATTORNEY