

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

<b>UNITED STATES OF AMERICA</b>	:	<b>CRIMINAL NO.</b> _____
	:	
v.	:	<b>DATE FILED:</b> _____
	:	
<b>TANYA GIBBS-SCOTT</b>	:	<b>VIOLATIONS: 18 U.S.C. § 1344</b>
	:	<b>(bank fraud - 1 count)</b>

**INFORMATION**

**COUNT ONE**

**THE UNITED STATES ATTORNEY CHARGES THAT:**

At all times material to this information:

1. PNC Bank, N.A. was a financial institution whose deposits were insured by the Federal Deposit Insurance Corporation, certificate number 6384, and had branch locations throughout the Philadelphia area.

2. Defendant TANYA GIBBS-SCOTT, a resident of Philadelphia, was employed as a business banking specialist at a regional branch office of PNC Bank and whose responsibilities included, among others, processing loan applications on behalf of current or prospective small business customers of PNC Bank, N.A.

3. From in or about October 2004 through in or about September 2005, in the Eastern District of Pennsylvania and elsewhere, defendant

**TANYA GIBBS-SCOTT**

knowingly executed, and attempted to execute, a scheme to defraud PNC Bank, N.A., 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. It was a part of the scheme that defendant TANYA GIBBS-SCOTT submitted for processing and approval to PNC Bank's loan department a total of four fraudulent loan applications totaling \$91,000 on behalf of fictional and non-existent non-profit organizations known as "Philadelphia Center for the Aging and Disabled" and "People for People," and then used and spent the funds for her own personal benefit.

It was further a part of the scheme:

### **\$25,000 PCAD Line of Credit**

5. In early October 2004, defendant TANYA GIBBS-SCOTT prepared a \$25,000 line of credit application to PNC Bank, N.A. using a non-existent and purely fictional nonprofit entity that she created and named "Philadelphia Center for the Aging and Disabled" (hereafter "PCAD").

6. In connection with the loan application, defendant TANYA GIBBS-SCOTT identified three fictitious persons as PCAD's board members, attached a phony grant agreement that was purportedly issued by the Commonwealth of Pennsylvania, a phony PCAD mission statement regarding the nonprofit's organizational purpose, a phony PCAD budget for July 1, 2004 to June 30, 2005, and a phony independent auditor's report for PCAD that, among other things, purported to show that PCAD was a legitimate nonprofit organization with federal and state grant awards exceeding \$400,000 and total assets of more than \$500,000.

7. On the loan application, defendant TANYA GIBBS-SCOTT used an address in Philadelphia where she would be able to receive mail as the official business address of PCAD.

8. On or about October 13, 2004, defendant TANYA GIBBS-SCOTT submitted the \$25,000 fraudulent line of credit application that she had prepared in the name of PCAD, along with the fraudulent supporting documentation, to PNC Bank's loan department and thereby created the false impression that this was a legitimate business transaction that she was handling in her official capacity as a PNC Bank business banking specialist. In the branch transmittal cover sheet that accompanied the line of credit application materials, defendant TANYA GIBBS-SCOTT falsely certified to PNC Bank's loan department that "to the best of my knowledge the loan amount is consistent with the stated purpose of the loan."

9. Based on defendant TANYA GIBBS-SCOTT's fraudulent statements and misrepresentations, the \$25,000 line of credit application was approved by PNC Bank, N.A. on or about October 21, 2004 and, shortly thereafter, defendant TANYA GIBBS-SCOTT began drawing down funds against the line of credit until she had fully exhausted the \$25,000 limit.

#### **\$50,000 PCAD Line of Credit**

10. On or about December 13, 2004, defendant TANYA GIBBS-SCOTT submitted a new application on behalf of PCAD requesting an additional line of credit in the amount of \$50,000.

11. As with the \$25,000 PCAD line of credit, defendant TANYA GIBBS-SCOTT again used the identities of fictitious persons as PCAD board members for purposes of signing the loan application and creating the illusion that PCAD was, in fact, a legitimate nonprofit organization.

12. In connection with the \$50,000 PCAD line of credit application, defendant TANYA GIBBS-SCOTT falsely certified to PNC Bank's loan department that "to the best of my

knowledge the loan amount is consistent with the stated purpose of the loan,” and, in order to obtain approval of the line of credit application, falsely reported to PNC Bank’s loan department that the \$25,000 line of credit, which was still unpaid at the time, had been “maxed out because the grant that was expected to arrive for the last quarter of 2004 was delayed and will not arrive until February 2005.” In fact, as defendant GIBBS-SCOTT knew, PCAD did not exist and was not expecting any grant money.

13. On or about December 15, 2004, based on the fraudulent statements and misrepresentations of defendant TANYA GIBBS-SCOTT, PNC Bank, N.A. approved the \$50,000 PCAD line of credit. Shortly thereafter, and in the months that followed, defendant GIBBS-SCOTT drew down funds totaling more than \$35,000 against the line of credit.

**People for People \$5,000 Line of Credit and \$11,000 Loan**

14. In order to fraudulently obtain additional funds from her employer, PNC Bank, N.A., in the spring of 2005, defendant TANYA GIBBS-SCOTT created another phony nonprofit organization which she named “People for People” and whose nonprofit organizational purpose she described as “to improve the quality of life for handicapped people.”

15. On or about March 23, 2005, defendant TANYA GIBBS-SCOTT prepared on behalf of People for People a \$5,000 line of credit application and an \$11,000 loan application.

16. In connection with the line of credit and loan applications, defendant TANYA GIBBS-SCOTT identified fictitious persons as People for People’s board members and attached a phony independent auditor’s report for People for People that, among other things, purported to show that it was a legitimate nonprofit organization with state grant awards of more than \$400,000 and total assets of more than \$600,000.

17. On or about March 22, 2005, defendant TANYA GIBBS-SCOTT submitted the \$5,000 line of credit application and the \$11,000 loan application that she had prepared in the name of People for People, along with the fraudulent supporting documentation, to PNC Bank's loan department and thereby created the false impression that this was a legitimate business transaction that she was handling in her official capacity as a PNC Bank business banking specialist. In the branch transmittal cover sheet that accompanied the line of credit and loan application materials, defendant TANYA GIBBS-SCOTT falsely certified to PNC Bank's loan department that "to the best of my knowledge the loan amount is consistent with the stated purpose of the loan."

18. On or about March 23, 2005, based on the fraudulent statements and misrepresentations of defendant TANYA GIBBS-SCOTT, PNC Bank, N.A. approved the \$11,000 loan to People for People. Shortly thereafter, and in the months that followed, defendant GIBBS-SCOTT used the loan proceeds for her own personal benefit.

19. On or about March 29, 2005, based on the fraudulent statements and misrepresentations of defendant TANYA GIBBS-SCOTT, PNC Bank, N.A. approved the \$5,000 line of credit to People for People. Shortly thereafter, and in the months that followed, defendant GIBBS-SCOTT drew down nearly the full amount of \$5,000 credit line limit.

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

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**PATRICK L. MEEHAN**  
**United States Attorney**