

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

UNITED STATES OF AMERICA	:	CRIMINAL NO. _____
v.	:	DATE FILED: _____
ELIZABETH SANCHEZ,	:	VIOLATIONS:
a/k/a "Rainbow"	:	18 U.S.C. § 1001 (false statements
	:	within federal jurisdiction - 3
	:	counts)
	:	18 U.S.C. § 2232 (destruction or
	:	removal of property to prevent
	:	seizure - 1 count)
	:	18 U.S.C. § 2 (aiding and abetting)

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

At all times relevant to this indictment:

1. Beginning in approximately August 2008, agents of the Federal Bureau of Investigation commenced an investigation to determine the identity of the person or persons who had alerted Person #1, a person known to the grand jury, of the existence of a federal law enforcement investigation into Person #1's drug trafficking activity.

2. Defendant ELIZABETH SANCHEZ was involved in a romantic relationship with Person #2, known to the grand jury, a Philadelphia Police Officer who had participated in a federal law enforcement investigation that was conducted by the Drug Enforcement Administration into Person #1's drug trafficking activity.

3. From in or about 2006 until in or about June 2008, defendant ELIZABETH SANCHEZ gave Person #1 information about the federal law enforcement

investigation into Person #1's drug trafficking activity.

4. On or about September 29, 2008, in Glenside, in the Eastern District of Pennsylvania, defendant

**ELIZABETH SANCHEZ,
a/k/a "Rainbow,"**

in a matter within the jurisdiction of the Federal Bureau of Investigation ("FBI"), an agency of the executive branch of the United States, knowingly and willfully made materially false, fictitious, and fraudulent statements and representations in that defendant ELIZABETH SANCHEZ told agents of the FBI that she had never given any information to Person #1 about a federal law enforcement investigation into Person #1's drug trafficking activity.

In violation of Title 18, United States Code, Section 1001.

COUNT TWO

THE GRAND JURY CHARGES THAT:

1. Paragraphs 1 through 3 of Count One of this indictment are incorporated here.

2. Defendant ELIZABETH SANCHEZ and Person #2 communicated, among other ways, via cellular telephone conversations and text messaging.

3. On or about September 29, 2008, in Glenside, in the Eastern District of Pennsylvania, defendant

**ELIZABETH SANCHEZ,
a/k/a "Rainbow,"**

in a matter within the jurisdiction of the Federal Bureau of Investigation ("FBI"), an agency of the executive branch of the United States, knowingly and willfully made materially false, fictitious, and fraudulent statements and representations in that defendant ELIZABETH SANCHEZ told agents of the FBI that she had never communicated with Person #2 via text messaging.

In violation of Title 18, United States Code, Section 1001.

COUNT THREE

THE GRAND JURY CHARGES THAT:

1. Paragraphs 1 through 3 of Count One of this indictment are incorporated here.

2. On or about September 19, 2008, defendant ELIZABETH SANCHEZ accepted \$300 from Person #2, which she used to pay her child's school tuition.

3. On or about September 29, 2008, in Glenside, in the Eastern District of Pennsylvania, defendant

**ELIZABETH SANCHEZ,
a/k/a "Rainbow,"**

in a matter within the jurisdiction of the Federal Bureau of Investigation ("FBI"), an agency of the executive branch of the United States, knowingly and willfully made materially false, fictitious, and fraudulent statements and representations in that defendant ELIZABETH SANCHEZ told agents of the FBI that she had never received money, gifts, or anything of pecuniary value from Person #2.

In violation of Title 18, United States Code, Section 1001.

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 through 3 of Count One of this indictment are incorporated here.

2. On or about October 1, 2008, agents of the Federal Bureau of Investigation (“FBI”) went to defendant ELIZABETH SANCHEZ’s house, 221 East Indiana Avenue, Philadelphia, Pennsylvania, to seize the desktop computer in her bedroom pursuant to a search warrant.

3. There was no desktop computer inside ELIZABETH SANCHEZ’s bedroom when FBI agents went there to seize it.

4. On or about September 29, 2008, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**ELIZABETH SANCHEZ,
a/k/a “Rainbow,”**

before, during, and after a search for and seizure of property by a person authorized to make such search and seizure, knowingly destroyed, damaged, disposed of, and transferred, and aided and abetted and willfully caused the destruction, damage, disposition, and transfer of, property, that is, a desktop computer inside defendant ELIZABETH SANCHEZ’S bedroom, 221 East Indiana Avenue, Philadelphia, Pennsylvania, for the purpose of preventing and impairing the FBI’s

lawful authority to take such property into its custody and control.

In violation of Title 18, United States Code, Sections 2232(a) and 2.

A TRUE BILL:

GRAND JURY FOREPERSON

**ZANE DAVID MEMEGER
UNITED STATES ATTORNEY**