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FILED

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CLERK US DISTRICT COURT
DISTRICT OF ARIZONA

CR19-01332 TUC-JGZ(BGM)

13 IN THE UNITED STATES DISTRICT COURT
14 FOR THE DISTRICT OF ARIZONA

15 United States of America,

INDICTMENT

16 Plaintiff,

Violations:

17 vs.

18 18 U.S.C. § 1344
19 (Bank Fraud)
20 Count 1

21 Jacob Roach,

22 Defendant.

VICTIM CASE

23 **THE GRAND JURY CHARGES:**

24 **COUNT 1,**

25 **SCHEME TO DEFRAUD**

26 The defendant was employed by Chase Bank in Tucson, Arizona, as a business
27 relationship banker. The victim in this case is P.C.A. P.C.A. is approximately 82 years
28 old. The victim has a number of accounts with Chase Bank. P.C.A. and used the same
branch as a customer at which the defendant worked. At all relevant times to this
indictment, Chase Bank was a federally insured financial institution.

On or about October 4, 2016, the defendant fraudulently caused P.C.A. unwittingly
to open up a new account entitled the P.C.A. Scholarship Fund (the Scholarship Fund
Account). The Scholarship Fund Account was linked to P.C.A.'s other Chase accounts. A
debit card was issued after the Scholarship Fund Account was opened and the defendant
took possession of the card. On that same date, the defendant fraudulently transferred

1 \$100,000 from one of P.C.A.'s other Chase Bank accounts into the Scholarship Fund
2 Account without P.C.A.'s knowledge and consent. The defendant resigned from Chase
3 Bank on October 15, 2016. Thereafter the defendant caused the on-line fraudulent transfer
4 of an additional \$1,150,000 from several of P.C.A.'s Chase Bank accounts into the
5 Scholarship Fund Account again without P.C.A.'s knowledge and consent. The defendant
6 subsequently withdrew the funds deposited into the Scholarship Fund Account for his own
7 use and benefit through the use of the debit card and by other means. The total loss to
8 P.C.A. as a result of defendant's scheme and artifice to defraud was \$1,250,000.

9 **BANK FRAUD**

10 On or about October 4, 2016, at or near Tucson, in the District of Arizona, the
11 defendant, Jacob Roach, did knowingly and with the intent to defraud, execute and attempt
12 to execute the above scheme and artifice to: (1) defraud Chase Bank, a financial institution,
13 and (2) obtain moneys and funds belonging to P.C.A. which were under the custody and
14 control of Chase Bank, by means of material false and fraudulent pretenses,
15 representations, and promises, to-wit: by transferring \$100,000 from P.C.A.'s Chase Bank
16 account to the Scholarship Fund Account, fraudulently established by the defendant at
17 Chase Bank, without P.C.A.'s knowledge and consent.

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

19
20 A TRUE BILL

21 /S/

22 Presiding Juror

23 MICHAEL BAILEY
24 United States Attorney
25 District of Arizona

REDACTED FOR
PUBLIC DISCLOSURE

26 /S/

27 Assistant U.S. Attorney
Dated: May 22, 2019