

FILED

2019 JUL 31 PM 4:08
CENTRAL DISTRICT OF CALIFORNIA
U.S. DISTRICT COURT

UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,
Plaintiff,
v.
MARIE FULLE,
Defendant.

CR No. **19CR00440-VAP**
I N F O R M A T I O N
[18 U.S.C. § 1344(2): Bank Fraud]

The United States Attorney charges:

COUNTS ONE AND TWO
[18 U.S.C. § 1344(2)]

A. INTRODUCTORY ALLEGATIONS

At times relevant to this Information:

1. Defendant MARIE FULLE was a resident of Orange County, within the Central District of California.

2. Comerica Bank ("Comerica") was a financial institution with deposits insured by the Federal Deposit Insurance Corporation.

Comerica employed defendant FULLE as a branch manager of its Tustin branch located at 3025 El Camino Real, Tustin, California 92782

1 ("Tustin Branch"). Defendant FULLE's responsibilities included
2 maintaining a cash box, managing staff and branch operations, client
3 development, providing banking services to customers, and selling
4 financial products, including home equity lines of credit, mortgages,
5 and credit cards. Defendant FULLE also acted as the vault teller for
6 the Tustin branch from approximately August 2012 to approximately
7 February 2014 while also working as a branch manager. Defendant
8 FULLE thereby controlled the flow of cash into and out of the Tustin
9 Branch vault.

10 3. Client No. 1 was a client of the Comerica Tustin Branch,
11 where he maintained several bank accounts, including two personal
12 checking accounts; a personal savings account; a business account;
13 three trust accounts; and a home equity line of credit account
14 (collectively, "Comerica Accounts"). Client No. 1 was the only
15 authorized signatory on the Comerica Accounts. By 2014, Client No. 1
16 had approximately \$7 million on deposit in the Comerica Accounts.

17 4. Fantasy Sports Line ("FS Line") was a gambling business
18 defendant FULLE used for placing bets between in or about 2013 and in
19 or about 2014.

20 B. THE SCHEME TO DEFRAUD

21 5. Beginning no later than in or about February 2013 and
22 continuing to in or about April 2014, in Orange County, within the
23 Central District of California, and elsewhere, defendant FULLE
24 knowingly and with intent to defraud, executed and attempted to
25 execute, a scheme to obtain moneys and other property owned by, and
26 under the custody and control of Comerica, by means of materially
27 false and fraudulent pretenses, representations, and promises, and
28 the concealment of material facts.

1 C. MEANS TO ACCOMPLISH THE SCHEME TO DEFRAUD

2 6. The fraudulent scheme operated, in substance, in the
3 following manner:

4 a. Defendant FULLE provided customer service to Client
5 No. 1 at Comerica and, as manager, instructed her employees that
6 Client No. 1 should be managed exclusively by defendant FULLE when
7 she was available. Through defendant FULLE's cultivation of this
8 exclusive customer relationship with Client No. 1, defendant FULLE
9 became familiar with Client No. 1's banking practices and signature,
10 and established a pattern of handling transactions on his behalf at
11 Comerica, even though she was not a signatory on Client No. 1's
12 Comerica Accounts.

13 b. Defendant FULLE, acting without Client No. 1's
14 authorization and in violation of various bank policies, prepared
15 (1) withdrawal slips using Client No. 1's forged signature, through
16 which she withdrew funds from Client No. 1's Comerica Accounts, and
17 (2) cashier's checks drawn on Client No. 1's Comerica Accounts,
18 including checks to third parties that defendant FULLE then cashed
19 herself.

20 c. Defendant FULLE used the funds withdrawn and from the
21 cashed cashier's checks for her own personal benefit, including to
22 finance her gambling debts. In many instances, the cashiers' checks
23 were made payable to FS Line, a gambling business defendant FULLE
24 used for placing bets between in or about 2013 and in or about 2014.

25 d. In order to conceal her unauthorized withdrawals and
26 cashier's checks from Client No. 1, defendant FULLE (1) made several
27 unauthorized transfers between Client No. 1's accounts, including
28 transfers to and from Client No. 1's Comerica savings account, and

1 (2) made unauthorized withdrawals from several of Client No. 1's
2 accounts.

3 e. In order to conceal her unauthorized withdrawals and
4 cashier's checks from Comerica, defendant FULLE used her position as
5 a manager (1) to meet privately with Client No. 1 outside the view of
6 surveillance cameras and bank tellers to conduct transactions
7 purportedly on Client No. 1's behalf outside usual bank procedures
8 and (2) to ensure that the unauthorized transactions purportedly for
9 Client No. 1 were processed from cash drawers associated with other
10 tellers (i.e., cash drawers not associated with defendant FULLE).

11 //

12 //

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

1 D. EXECUTIONS OF THE FRAUDULENT SCHEME

2 7. On or about the following dates, within the Central
3 District of California, and elsewhere, defendant FULLE, committed the
4 following acts, each of which constituted an execution and attempted
5 execution of the fraudulent scheme:

COUNT	DATE	ACT
ONE	12/26/2013	Withdrawal of \$39,438 from Client No. 1's Comerica checking account
TWO	1/8/2014	Withdrawal of \$30,000 from Client No. 1's Comerica savings account

12 NICOLA T. HANNA
13 United States Attorney

14 *Brandon Fox*

15 BRANDON D. FOX
16 Assistant United States Attorney
17 Chief, Criminal Division

18 RANEE A. KATZENSTEIN
19 Assistant United States Attorney
20 Chief, Major Frauds Section

21 KRISTEN A. WILLIAMS
22 Assistant United States Attorney
23 Deputy Chief, Major Frauds Section

24 KIMBERLY D. JAIMEZ
25 Assistant United States Attorney
26 Major Frauds Section