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CLERK US DISTRICT COURT
DISTRICT OF ARIZONA

CR19-00187 TUC-JGZ(se)

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

15 United States of America,

16 Plaintiff,

17 vs.

18 Faye Ann Singer,

19 Defendant.

INDICTMENT

Violations:

18 U.S.C. § 1344
(Bank Fraud)
Count 1

VICTIM CASE

18 U.S.C. § 1028A(a)(1)
(Aggravated Identity Theft)
Counts 2-5

20 **THE GRAND JURY CHARGES:**

21 Introductory Allegations

22 At all times relevant to this Indictment:

- 23 1. Bank of America was a bank whose accounts were insured by the Federal Deposit
- 24 Insurance Corporation and as such, it was a federally insured financial institution,
- 25 conducting business in Tucson, Arizona.
- 26 2. The defendant, FAYE ANN SINGER (SINGER), was employed as a resident
- 27 assistant by a senior living community, with independent and assisted living services
- 28 available, in Oro Valley, outside of Tucson, Arizona from approximately February
- 2016 through approximately December 2017.
3. The victim, A.F., age 92, was a resident at the senior living community, where
- Defendant SINGER worked, from August 2013 through December 2018.

1 4. The victim, A.F., had banking accounts at Bank of America.

2 **COUNT 1**
3 **Bank Fraud**
4 **(18 U.S.C. § 1344)**

5 5. Paragraphs one through four of the Indictment are re-alleged and reincorporated.

6 6. From on or about April 2017 through on or about August 2018, at or near Tucson, in
7 the District of Arizona, Defendant SINGER, knowingly, with intent to defraud, did
8 execute and attempt to execute a scheme or artifice to defraud a federally insured
9 financial institution and to obtain money, funds, assets, and other property owned by
10 and under the custody and control of the financial institution by means of materially
11 false and fraudulent pretenses, representations, and promises.

12 7. Examples of how Defendant SINGER executed the scheme to defraud are as follows:

13 a. Defendant SINGER forged a significant number of checks belonging to the Bank
14 of America account holder, A.F., fraudulently negotiating, endorsing, cashing, and
15 depositing those checks into Defendant SINGER's own personal banking account.
16 In so doing, the defendant falsely represented that A.F. had legitimately endorsed
17 such checks when in fact A.F. had not done so.

18 b. Defendant SINGER fraudulently transferred money from A.F.'s Bank of America
19 account to pay Defendant SINGER's own personal expenses.

20 8. In executing the scheme, Defendant SINGER obtained approximately \$93,378.25
21 from A.F.'s Bank of America account.

22 All in violation of 18 U.S.C. §§ 1344(1) and (2).

23 **COUNTS 2-5**

24 **Aggravated Identity Theft**

25 **(18 U.S.C. 1028A)**

26 12. On or about the dates listed below, at or near Tucson, in the District of
27 Arizona, Defendant SINGER did knowingly transfer, possess, and use without lawful
28 authority, a means of identification of another person, during and in relation to a felony
violation enumerated in 18 U.S.C. § 1028A(c), to wit 18 U.S.C. § 1344, bank fraud as

charged in Count 1, knowing that the means of identification belonged to another actual person, that is, "A.F." as set forth below in each count:

Count	Date	Method	Drawn From	Payment To	Amount
Count 2	5/7/2017	Check No. 7639	A.F. Bank of America Acct	Faye Singer	\$800.00
Count 3	1/11/2018	Electronic Bill Payment	A.F. Bank of America Acct	TEP Corporate, Faye Singer Account	\$383.46
Count 4	4/11/2018	Check No. 7595	A.F. Bank of America Acct	Faye Singer	\$5,000.00
Count 5	5/23/2018	Electronic Bill Payment	A.F. Bank of America Acct	T-Mobile.com for Fayeann Singer	\$179.92

All in violation of 18 U.S.C. § 1028A(a)(1).

A TRUE BILL

/S/
Presiding Juror

ELIZABETH A. STRANGE
First Assistant United States Attorney
District of Arizona

/S/
Assistant U.S. Attorney

Date: January 16, 2019

REDACTED FOR PUBLIC DISCLOSURE