

May 23, 2017
STEVEN M. LARIMORE
CLERK U.S. DIST. CT.
S.D. OF FLA. - MIAMI

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
17-60128-CR-DIMITROULEAS/SNOW

CASE NO. _____

18 U.S.C. § 1344
18 U.S.C. § 1343
18 U.S.C. § 1029(a)(2)
18 U.S.C. § 1028A

UNITED STATES OF AMERICA

vs.

TIFFANY STROBL,

Defendant.

_____ /

INDICTMENT

The Grand Jury charges that:

GENERAL ALLEGATIONS

At all times relevant to this Indictment:

1. TD Bank, N.A. ("TD Bank") was a financial institution with offices located in the State of Florida whose accounts were insured by the Federal Deposit Insurance Corporation.
2. PNC Bank, N.A. was a financial institution with offices located in the State of Florida whose accounts were insured by the Federal Deposit Insurance Corporation.
3. Wells Fargo Bank, N.A. was a financial institution with offices located in the State of Florida whose accounts were insured by the Federal Deposit Insurance Corporation.
4. Capital One Bank, N.A. was a financial institution with offices located in the State of Florida whose accounts were insured by the Federal Deposit Insurance Corporation.

COUNTS 1 - 3
(Bank Fraud)
18 U.S.C. § 1344

5. Paragraphs 1 through 4 of the General Allegations section of this Indictment are incorporated by reference and re-alleged in their entirety herein.

6. Beginning on or about September 18, 2016, the exact date being unknown to the Grand Jury, and continuing through on or about February 17, 2017, in Broward County, in the Southern District of Florida, and elsewhere, the defendant,

TIFFANY STROBL,

did knowingly, and with intent to defraud, execute, and attempt to execute a scheme and artifice to defraud one or more financial institutions, and to obtain moneys and funds owned by, and under the custody and control of, one or more financial institutions, by means of false and fraudulent pretenses, representations, and promises, relating to a material fact, in violation of Title 18, United States Code, Sections 1344(1) and (2).

PURPOSE OF THE SCHEME AND ARTIFICE

7. It was the purpose of the scheme and artifice for the defendant, **TIFFANY STROBL**, to obtain United States currency under false pretenses by opening bank accounts using a false name and depositing counterfeit and fraudulently obtained checks into bank accounts over which she had control, with the intent that those checks be used to obtain funds from financial institutions.

MANNER AND MEANS OF THE SCHEME AND ARTIFICE

The manner and means by which the defendant sought to accomplish the purpose of the scheme and artifice included, among other things, the following:

8. **TIFFANY STROBL** opened bank accounts using false names.

9. **TIFFANY STROBL** deposited counterfeit and fraudulently obtained checks into those bank accounts.

10. **TIFFANY STROBL** then made cash withdrawals and debit card purchases using those funds.

EXECUTION OF THE SCHEME AND ARTIFICE

11. On or about the dates specified below, the defendant, **TIFFANY STROBL** did execute, and cause the execution of, the above described scheme and artifice to defraud, as more particularly described below:

Count	Date	Execution
1	February 6, 2017	Caused to be deposited counterfeit check number 3467976, in the amount of \$2,459.35, drawn against a Fifth Third Bank account in the name of "Barnes & Thornburg LLP."
2	February 6, 2017	Caused to be deposited counterfeit check number 3467973, in the amount of \$2,895.35, drawn against a Fifth Third Bank account in the name of "Barnes & Thornburg LLP."
3	February 7, 2017	Caused to be deposited counterfeit check number 58689203, in the amount of \$3,051.00, drawn against a Northern Trust bank account in the name of "G.H."

All in violation of Title 18, United States Code, Sections 1344(1) and (2) and 2.

COUNT 4
(Wire Fraud)
18 U.S.C. § 1343

12. Paragraph 1 of the General Allegations section of this Indictment is incorporated by reference and re-alleged in its entirety herein.

13. Beginning on or about January 27, 2017, and continuing through on or about February 17, 2017, in Broward County, in the Southern District of Florida, and elsewhere, the defendant,

TIFFANY STROBL,

did knowingly, and with intent to defraud, devise, and intend to devise, a scheme and artifice to defraud, and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, knowing that the pretenses, representations, and promises were false and fraudulent when made, and for the purpose of executing the scheme and artifice, did knowingly transmit and cause to be transmitted, by means of wire communication in interstate commerce, certain writing, signs, signals, pictures and sounds.

PURPOSE OF THE SCHEME AND ARTIFICE

14. It was the purpose of the scheme and artifice for the defendant, **TIFFANY STROBL**, to unlawfully enrich herself by making or causing to be made, false representations to “L.O.,” including that “L.O.” needed to post bond for an incarcerated family member, to induce “L.O.” to make a wire transfer to an account controlled by **TIFFANY STROBL**.

MANNER AND MEANS OF THE SCHEME AND ARTIFICE

The manner and means by which the defendant sought to accomplish the purpose of the scheme and artifice included, among other things, the following:

15. **TIFFANY STROBL** opened a bank account at TD Bank using a false name.

16. **TIFFANY STROBL** caused “L.O.” to be contacted by phone and be advised that her grandson had been arrested and that “L.O.” needed to send money to a bondsman to secure his release, which was a false and fraudulent representation.

17. **TIFFANY STROBL** caused money fraudulently obtained from “L.O.,” in the form of a wire transfer through a Federal Reserve Bank, to be deposited into the TD Bank account over which she had control.

18. **TIFFANY STROBL** then made cash withdrawals and debit card purchases using those funds in the Southern District of Florida and elsewhere.

USE OF THE WIRES

19. On or about the date listed below, in Broward County, in the Southern District of Florida, and elsewhere, the defendant, **TIFFANY STROBL**, for the purpose of executing the aforesaid scheme and artifice to defraud and to obtain money, did knowingly transmit and cause to be transmitted in interstate commerce, by means of wire communication, certain writings, signs, signals, pictures, and sounds as more particularly described below:

Date	Wire Communication
February 3, 2017	\$5,000 wire transfer initiated by "L.O." from First Security Bank and Trust in Iowa to TD Bank in Jacksonville, Florida

In violation of Title 18, United States Code, Sections 1343 and 2.

COUNT 5
(Use of Unauthorized Access Devices)
18 U.S.C. § 1029(a)(2)

Beginning on or about January 27, 2017, the exact date being unknown to the Grand Jury, through on or about February 17, 2017, in Broward County, in the Southern District of Florida, and elsewhere, the defendant,

TIFFANY STROBL,

did knowingly, and with intent to defraud, traffic in and use one or more unauthorized access devices during any one-year period, that is a debit card account number, and by such conduct did obtain anything of value aggregating \$1,000 or more during that period, said conduct affecting interstate and foreign commerce, in violation of Title 18, United States Code, Sections 1029(a)(2) and 2.

COUNT 6
Aggravated Identity Theft
(18 U.S.C. § 1028A(a)(1))

Beginning on or about January 27, 2017, the exact date being unknown to the Grand Jury, and continuing through on or about February 17, 2017, in Broward County, in the Southern District of Florida, the defendant,

TIFFANY STROBL,

during and in relation to a felony violation of Title 18, United States Code, Section 1029(a)(2), that is, knowingly, and with intent to defraud, did use one or more unauthorized access devices, that is, a debit card account number, during any one-year period, and by such conduct did obtain anything of value aggregating \$1,000 or more during that period, said conduct affecting interstate and foreign commerce, as charged in Count 5 of this Indictment, did knowingly transfer, possess, and use, without lawful authority, a means of identification of another person, that is, the name and social security number of "L.J.," in violation of Title 18, United States Code, Sections 1028A(a)(1) and 2.

A TRUE BILL


FOREPERSON


BENJAMIN G. GREENBERG
ACTING UNITED STATES ATTORNEY


ANITA G. WHITE
ASSISTANT UNITED STATES ATTORNEY

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

UNITED STATES OF AMERICA

CASE NO. _____

vs.

CERTIFICATE OF TRIAL ATTORNEY*

TIFFANY STROBL,

Defendant.

_____ /

Superseding Case Information:

Court Division: (Select One)

New Defendant(s) Yes _____ No _____
Number of New Defendants _____
Total number of counts _____

X Miami _____ Key West _____
FTL _____ WPB _____ FTP _____

I do hereby certify that:

- I have carefully considered the allegations of the indictment, the number of defendants, the number of probable witnesses and the legal complexities of the Indictment/Information attached hereto.
- I am aware that the information supplied on this statement will be relied upon by the Judges of this Court in setting their calendars and scheduling criminal trials under the mandate of the Speedy Trial Act, Title 28 U.S.C. Section 3161.
- Interpreter: (Yes or No) No
List language and/or dialect _____
- This case will take 3-4 days for the parties to try.
- Please check appropriate category and type of offense listed below:

(Check only one)	(Check only one)
I 0 to 5 days <u>X</u>	Petty Minor _____
II 6 to 10 days _____	Misdem. _____
III 11 to 20 days _____	Felony X _____
IV 21 to 60 days _____	
V 61 days and over _____	

6. Has this case been previously filed in this District Court? (Yes or No) No

If yes: Judge: Case No. _____

(Attach copy of dispositive order) Has a complaint been filed in this matter? (Yes or No) No

If yes: Magistrate Case No. _____
Related Miscellaneous numbers: _____
Defendant(s) in federal custody as of _____
Defendant(s) in state custody as of _____
Rule 20 from the _____ District of _____

Is this a potential death penalty case? (Yes or No) No

7. Does this case originate from a matter pending in the Northern Region of the U.S. Attorney's Office prior to October 14, 2003? _____ Yes x No

8. Does this case originate from a matter pending in the Central Region of the U.S. Attorney's Office prior to September 1, 2007? _____ Yes x No

ANITA G. WHITE
ASSISTANT UNITED STATES ATTORNEY
Florida Bar No. 537861

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: TIFFANY STROBL

Case No: _____

Counts #:1 - 3

Bank Fraud

Title 18, United States Code, Section 1344

*Max. Penalty: 30 years' imprisonment, 5 years' supervised release, \$1,000,000 fine

Count #:4

Wire Fraud

Title 18, United States Code, Section 1343

*Max. Penalty: 20 years' imprisonment, 5 years' supervised release, \$250,000 fine

Count #:5

Access Device Fraud

Title 18, United States Code, Section 1029(a)(2)

*Max. Penalty: 10 years' imprisonment, 3 years' supervised, \$250,000 fine

Count #:6

Aggravated Identity Theft

Title 18, United States Code, Section 1028A

*Max. Penalty: Mandatory 2 years' imprisonment consecutive to any other term of imprisonment, 1 year supervised release, \$250,000 fine

***Refers only to possible term of incarceration, does not include possible fines, restitution, special assessments, parole terms, or forfeitures that may be applicable.**