

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

UNITED STATES OF AMERICA * CRIMINAL NO. 20-122

v. * SECTION: "D"

ARLENE TRANCHINA *






* * *

FACTUAL BASIS

The defendant, ARLENE TRANCHINA, (hereinafter, the "defendant" or "TRANCHINA"), has agreed to plead guilty as charged to the Superseding Bill of Information now pending against her, charging her with wire fraud, in violation of Title 18, United States Code, Section 1343. Both the Government and the defendant, TRANCHINA, do hereby stipulate and agree that the following facts set forth a sufficient factual basis for the crimes to which the defendant is pleading guilty. The Government and the defendant further stipulate that the Government would have proven, through the introduction of competent testimony and admissible, tangible exhibits, the following facts, beyond a reasonable doubt, to support the allegations in the Bill of Information now pending against the defendant:

From approximately 2006 until 2019, TRANCHINA was employed as an office manager by Company A, located in Reserve, Louisiana. During that time, Company A maintained a business checking account at United Community Bank ("Community Bank") account # [REDACTED]. The Government would further show that at all material times herein, Community Bank was a federally insured financial institution doing business in Reserve, Louisiana.

As office manager, TRANCHINA had access to Company A's business account checks

AUSA 
Defendant 
Defense Counsel 

and one of its company credit cards, though she was not an authorized signer on the account. At no time during her work for Company A did **TRANCHINA** have check writing authority for personal expenses nor was she authorized to use Company A's credit card for personal expenses. Company A also had a corporate credit card with First National Bank of Omaha (credit card account numbers [REDACTED] and [REDACTED]). During the relevant time periods, **TRANCHINA** had access to Company A's corporate credit card but she was not authorized to use it for personal expenses.

On or about October 14, 2019, Company A reviewed its business records after receiving an insufficient funds notification from Community Bank and learned that **TRANCHINA** had been writing checks to herself. Shortly thereafter, Company A terminated **TRANCHINA** and hired a Certified Public Accountant to review its business records.

Company A and Community Bank records showed that from on or about January 1, 2017, through October 14, 2019, **TRANCHINA** had written approximately ninety-three (93) unauthorized checks drawn from Company A's business bank account with Community Bank payable to herself or to cash. Company A's owners would pre-sign blank checks strictly for the purpose of **TRANCHINA** using them to pay company expenses in their absence. However, **TRANCHINA** used a portion of those blank checks to pay for personal expenses instead. The total amount of unauthorized checks withdrawn from Company A's business bank account was \$234,240.00. After receiving the Company A check with a signature for the purpose of paying a legitimate company expense, **TRANCHINA** made it payable to herself, signed the back of the check and deposited it into her bank account. At all times material herein, Company A had no knowledge that **TRANCHINA** was writing the checks to herself or to cash.

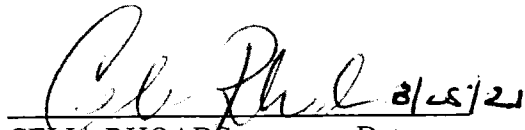
TRANCHINA also had access to one of its company credit cards as part of her job as office manager. From on or about January 1, 2018, to October 14, 2019, **TRANCHINA** made over two hundred unauthorized credit card charges for personal expenses with a corporate credit card issued to Company A by First National Bank of Omaha, totaling approximately \$73,316.89. At all times material herein, Company A had no knowledge that **TRANCHINA** was using the company credit card for personal expenses. For example, on December 30, 2018, **TRANCHINA** used Company A's First National Bank of Omaha corporate credit card to pay for a hotel room at Staybridge Suites, in New Orleans, Louisiana. The use of Company A's corporate credit card caused a wire communication to travel from within the Eastern District of Louisiana to Omaha, Nebraska, which is where the server for First National Bank of Omaha is located.

After being terminated by Company A, **TRANCHINA** was interviewed by a Special Agent with United States Secret Service and a detective with St. John the Baptist Parish Sheriff's Office on or about December 19, 2019. **TRANCHINA** immediately agreed to speak with agents and admitted that she had written the unauthorized checks in question without authority and that she had used Company A's credit card for personal expenses. She stated that she had an escalating gambling addiction that had gotten out of control in recent years and had led to financial hardship. **TRANCHINA** stated that she was trying to hide her addiction from her husband. **TRANCHINA** admitted that she had spent the money at casinos and traveling to them, in furtherance of her gambling addiction. She told agents that she had intended to pay the money back and tried to keep track of the money she spent so she could do so. In total, **TRANCHINA** knowingly took \$307,556.89 from Company A.

The above facts come from an investigation conducted by and would be proven at trial by credible testimony from, Special Agents from the United States Secret Service, Detectives with the St. John the Baptist Parish Sheriff's Office, representatives and employees of Company A, employees of Company A, business records from Company A, Community Bank, and First National Bank of Omaha, documents and tangible exhibits in the custody of the United States Secret Service, and the admissions of the defendant, **TRANCHINA**.


ARLENE TRANCHINA Date
Defendant


EDWARD J. RIVERA Date
Assistant United States Attorney


CELIA RHOADS Date
Attorney for Defendant