

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA : **Criminal Number: 21-**
 :
 v. :
 : **18 U.S.C. § 1341**
WALTER SYTNIK :

INFORMATION

The defendant having waived in open court prosecution by Indictment, the Acting United States Attorney for the District of New Jersey charges:

MAIL FRAUD
(18 U.S.C. § 1341)

The Victim Medical Practice and Other Relevant Entities

1. At all times relevant to this Information:
 - a. A medical provider (hereinafter the “Victim”) owned and operated a medical practice in Camden County, New Jersey (hereinafter the “Victim Medical Practice”).
 - b. The Victim Medical Practice maintained a bank account at Bank 1 (the “Bank 1 Account”).
 - c. Credit Card Company 1 was a large company specializing in charge and credit card products with a mailing address in Newark, New Jersey, where customers could mail credit card payments.

The Defendant

2. From in or about 2012 through in or about 2015, defendant WALTER SYTNIK was employed as a bookkeeper for the Victim Medical Practice.

3. In or about 2015, defendant WALTER SYTNIK left the employment of the Victim Medical Practice to enroll in school in Florida, but maintained a primary residence with his parents in Camden County, New Jersey.

4. At various times relevant to this Information, defendant WALTER SYTNIK maintained numerous credit card accounts, including, but not limited to, Credit Card Company 1 account numbers ending in 3009 and 4007.

The Defendant's Scheme to Defraud

5. From in or about May 2013 and through in or about April 2018, in Camden and Essex Counties, in the District of New Jersey and elsewhere, defendant

WALTER SYTNIK

knowingly and intentionally devised a scheme and artifice to defraud the Victim and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, as described below.

The Object of the Scheme and Artifice

6. The object of the scheme and artifice to defraud was for defendant WALTER SYTNIK to steal money from the Victim Medical Practice under false and fraudulent pretenses, including by stealing Bank 1 Account information, and blank checks payable from the Bank 1 Account, and using the checks without authority to pay personal expenses.

The Manner and Means of the Defendant's Scheme to Defraud

7. It was part of the scheme and artifice to defraud that defendant WALTER SYTNIK, while employed by the Victim Medical Practice, stole blank checks from the Victim Medical Practice, which checks were payable from the Victim Medical Practice's Bank 1 Account.

8. It was further part of the scheme and artifice to defraud that defendant WALTER SYTNIK forged the Victim's signature on such checks and used them to pay personal expenses, including his credit card bills.

9. It was further part of the scheme and artifice to defraud that defendant WALTER SYTNIK obtained the same types of credit cards at the same banks as the Victim, in order to evade the Victim's detection of his fraudulent scheme.

10. It was further part of the scheme and artifice to defraud that defendant WALTER SYTNIK sent the forged checks to his various creditors via U.S. Mail.

11. It was further part of the scheme and artifice to defraud that defendant WALTER SYTNIK used the Victim's identifying information, including the Victim's name, Victim Medical Practice's name and address, and Bank 1 Account information, to obtain additional checks drawable upon the Victim Medical Practice's Bank 1 Account, which checks were delivered to defendant WALTER SYTNIK via mail.

12. It was further part of the scheme and artifice to defraud that defendant WALTER SYTNIK continued to use the additional checks to pay his personal expenses, including his credit card bills, for expenses in New Jersey and elsewhere.

13. It was further part of the scheme and artifice to defraud that defendant WALTER SYTNIK stole in excess of \$500,000 during the time period from in or about May 2013 through in or about April 2018, including by mailing the forged checks to Credit Card Company 1 in Newark, New Jersey, in payment of defendant WALTER SYTNIK's credit card bills for the below indicated accounts between on or about the following dates and in the following amounts:

DATES	AMOUNT	BANK A ACCOUNT CHECK NUMBER	ACCOUNT PAID
9/30/2017-10/4/2017	\$3,121.06	6199	Credit Card Company 1 Account Ending in 3009
10/29/2017-11/2/2017	\$4,076.12	6179	Credit Card Company 1 Account Ending in 3009
11/21/2017-11/23/2017	\$8,109.14	6197	Credit Card Company 1 Account Ending in 3009
3/8/2018-3/11/2018	\$8,915.05	6190	Credit Card Company 1 Account Ending in 4007

The Mail Fraud

14. Between on or about October 29, 2017 and on or about November 2, 2017, in Camden and Essex Counties, in the District of New Jersey and elsewhere, the defendant,

WALTER SYTNIK,

for the purpose of executing the scheme and artifice to defraud, knowingly and intentionally placed and caused to be placed in a post office and authorized depository for mail, and caused to be delivered in accordance with the directions thereon, certain mail matter, that is, a forged check from the Victim Medical Provider's Bank 1 Account in the amount of \$4,076.12, to be sent and delivered by the United States Postal Service and commercial interstate carrier to Credit Card Company 1 in Newark, New Jersey.

In violation of Title 18, United States Code, Section 1341.



RACHAEL A. HONIG
Acting United States Attorney

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INFORMATION FOR

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