

UNITED STATES DISTRICT COURT
DISTRICT OF RHODE ISLAND

UNITED STATES OF AMERICA

v.

CHERYL S. SULLIVAN,
Defendant.

Cr. No. 1:22CR10WES-PAS

In violation of 18 U.S.C. § 1343

INDICTMENT

The Grand Jury charges that:

GENERAL ALLEGATIONS

Introduction

At times relevant to this indictment:

1. CHERYL S. SULLIVAN resided in Massachusetts and held herself out as a property manager doing business variously as Cheryl Dever Sullivan Broker/Realtor, Eagle Property Management and 1040 Eagle Tax.

2. Between September 1, 2018 and September 30, 2019, CHERYL S. SULLIVAN held herself out as a property manager capable of managing multi-unit condominium buildings.

3. River Island Condominium Association was a Rhode Island organization created as a condominium owners' association whose purpose was to maintain the quality of the condominium units located at 148 Bernon Street, Woonsocket, Rhode Island and to promulgate rules and regulations concerning condominium fees, the collection of those fees, the imposition of additional improvement fees, and the use and enjoyment of the property.

4. Citizens Bank was a federally insured financial institution headquartered in Johnston, Rhode Island with its computer servers located in Rhode Island.

5. Everi was a Las Vegas Nevada corporation offering a suite of financial service tools to the gaming industry including automated teller machines. Everi maintained automated teller machines at Plainridge Park Casino in Plainville, Massachusetts.

SULLIVAN'S SCHEME TO DEFRAUD
RIVER ISLAND CONDOMINIUM ASSOCIATION

6. On or about October 14, 2018, the River Island Condominium Association entered into an employment agreement with CHERYL S. SULLIVAN in which CHERYL S. SULLIVAN agreed to manage the property located at 148 Bernon Street Woonsocket, Rhode Island.

7. As part of her duties as the River Island Condominium Association property manager, CHERYL S. SULLIVAN was responsible for the collection of fees including the monthly condominium owners fee which she was entrusted to deposit into River Island Association Bank Accounts, including their Citizens Bank *Clearly Better* Business checking account number XXXX-118-6 to pay regular expenses incurred by the River Island Condominium Association.

8. From on or about October 14, 2018 to September 30, 2019, CHERYL S. SULLIVAN, the defendant, did knowingly devise a scheme and artifice to defraud members of the River Island Condominium Association who entrusted funds to her for

purposes of paying various condominium related expenses including, but not limited to, insurance, utilities, and taxes.

9. It was part of the scheme, that on or about October 17, 2018, the River Island Condominium Association in Rhode Island added CHERYL S. SULLIVAN as an authorized signatory to their Citizens Bank *Clearly Better* Business checking account number XXXX-118-6.

10. It was further part of the scheme, that on or after December 14, 2018, CHERYL S. SULLIVAN secured a debit card linked to the River Island Condominium Association's Citizens Bank checking account number XXXX-118-6, Citizens Bank debit card 3666 (last four).

Object of the Scheme to Defraud

11. It was the object of the scheme to defraud for CHERYL S. SULLIVAN to unlawfully access funds held in the River Island Condominium Association Citizens Bank *Clearly Better* Business checking account number XXXX-118-6 for her own personal expenses, including gambling at the Plainridge Park Casino.

Manner and Means

12. Beginning as early as February 4, 2019, CHERYL S. SULLIVAN used the debit card linked to the River Island Condominium Association Citizens Bank *Clearly Better* Business checking account number XXXX-118-6 to withdraw cash for her own use from ATM machines owned and operated by Everi of Las Vegas, Nevada, located at the Plainridge Park Casino in Plainville, Massachusetts.

COUNTS ONE-FIVEExecution of the Scheme

13. Paragraphs 1-12 are incorporated by reference herein.

14. Between October 14, 2018 and September 30, 2019, in the District of Rhode Island, and elsewhere, for the purpose of executing the scheme and artifice, and attempting to do so, defendant CHERYL S. SULLILVAN did knowingly transmit and cause to be transmitted in interstate or foreign commerce by means of wire communication, any writings, signs, and signals to wit,

COUNT	Approximate Date	DESCRIPTION OF WIRE TRANSMISSION
1	February 10, 2019	ATM withdrawal via Everi ATM machine located at Plainfield Park Casino from Citizens Bank <i>Clearly Better</i> Business checking account number XXXX-118-6
2	February 14, 2019	ATM withdrawal via Everi ATM machine located at Plainfield Park Casino from Citizens Bank <i>Clearly Better</i> Business checking account number XXXX-118-6
3	March 2, 2019	ATM withdrawal via Everi ATM machine located at Plainfield Park Casino from Citizens Bank <i>Clearly Better</i> Business checking account number XXXX-118-6
4	April 4, 2019	ATM withdrawal via Everi ATM machine located at Plainfield Park Casino from Citizens Bank <i>Clearly Better</i> Business checking account number XXXX-118-6

5	April 13, 2019	ATM withdrawal via Everi ATM machine located at Plainfield Park Casino from Citizens Bank <i>Clearly Better</i> Business checking account number XXXX-118-6
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All in violation of 18 U.S.C. § 1343.

A TRUE BILL:



Grand Jury Foreperson

ZACHARY A. CUNHA
United States Attorney

A handwritten signature in blue ink, appearing to read "William J. Ferland".

WILLIAM J. FERLAND
Assistant U.S. Attorney

A handwritten signature in blue ink, appearing to read "Lee H. Vilker".

LEE H. VILKER
Assistant U.S. Attorney
Deputy Criminal Division Chief

Date: 01/26/2022

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT

BY: ☐ INFORMATION ☒ INDICTMENT ☐ COMPLAINT

CASE NO. 1:22CR10WES-PAS

Matter Sealed: ☐ Juvenile ☐ Other than Juvenile
☐ Pre-Indictment Plea ☐ Superseding ☐ Defendant Added
☐ Indictment ☐ Charges/Counts Added
☐ Information

Name of District Court, and/or Judge/Magistrate Location (City)

UNITED STATES DISTRICT COURT RHODE ISLAND
DISTRICT OF RHODE ISLAND Divisional OfficeName and Office of Person
Furnishing Information on
THIS FORM Zachary A. Cunha
☒ U.S. Atty ☐ Other U.S. Agency
Phone No. (401) 709-5000Name of Asst.
U.S. Attorney William J. Ferland
(if assigned)

PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)

Federal Bureau of Investigation

☐ person is awaiting trial in another Federal or State Court
(give name of court)☐ this person/proceeding transferred from another district
per (circle one) FRCrP 20, 21 or 40. Show District☐ this is a reprosecution of charges
previously dismissed which were
dismissed on motion of:☐ U.S. Atty ☐ Defense☐ this prosecution relates to a
pending case involving this same
defendant. (Notice of Related
Case must still be filed with the
Clerk.)☐ prior proceedings or appearance(s)
before U.S. Magistrate Judge
regarding this defendant were
recorded underSHOW
DOCKET NO.MAG. JUDGE
CASE NO.Place of
offense RHODE ISLAND

County

USA vs.

Defendant: Cheryl S. Sullivan

Address:

☐ Interpreter Required Dialect: _____Birth
Date☐ Male ☐ Alien
☒ Female (if applicable)

Social Security Number _____

DEFENDANT

Issue: ☒ Warrant ☐ Summons

Location Status:

Arrest Date _____ or Date Transferred to Federal Custody _____

☐ Currently in Federal Custody☐ Currently in State Custody☐ Writ Required☐ Currently on bond☐ Fugitive

Defense Counsel (if any): _____

☐ FPD ☐ CJA ☐ RET'D☐ Appointed on Target Letter☐ This report amends AO 257 previously submitted

OFFENSE CHARGED - U.S.C. CITATION - STATUTORY MAXIMUM PENALTIES - ADDITIONAL INFORMATION OR COMMENTS

Total # of Counts 5

Set	Title & Section/Offense Level (Petty = 1 / Misdemeanor = 3 / Felony = 4)	Description of Offense Charged	Felony/Misd.
1-5	18 U.S.C. § 1343	Wire fraud	<input checked="" type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor
			<input type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor
	Max Penalties: 30 years imprisonment;		<input type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor
	\$1,000,000 fine; 3 years supervised release;		<input type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor
	\$100 special assessment.	Estimated Trial Days: 4	<input type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor