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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

MICHAEL BONANNO,

Defendant.

INFORMATION

18 Cr. ___ (PGG)

18 CRIM 427

JUDGE GARDEPHE

COUNT ONE
(Bank Fraud)

The United States Attorney charges:

1. From at least in or about November 2016, up to and including at least in or about March 2017, in the Southern District of New York and elsewhere, MICHAEL BONANNO, the defendant, willfully and knowingly did execute and attempt to execute a scheme and artifice to defraud financial institutions, the deposits of which were then insured by the Federal Deposit Insurance Corporation ("FDIC"), and to obtain moneys, funds, credits, assets, securities, and other property owned by, and under the custody and control of, such financial institutions, by means of false and fraudulent pretenses, representations, and promises, to wit, BONANNO caused, and attempted to cause, the unauthorized transfer of funds from victims' bank accounts to accounts controlled by BONANNO at various financial institutions.

(Title 18, United States Code, Sections 1344 and 2.)

COUNT TWO
(Conspiracy to Commit Bank Fraud)

The United States Attorney further charges:

2. From at least in or about November 2016 up to and including at least in or about March 2017, in the Southern District of New York and elsewhere, MICHAEL BONANNO, the defendant, and others known and unknown, willfully and knowingly did combine, conspire, confederate, and agree together and with each other to commit bank fraud, in violation of Title 18, United States Code, Section 1344.

3. It was a part and object of the conspiracy that MICHAEL BONANNO, the defendant, and others known and unknown, willfully and knowingly would and did execute and attempt to execute a scheme and artifice to defraud financial institutions, the deposits of which were then insured by the FDIC, and to obtain moneys, funds, credits, assets, securities, and other property owned by, and under the custody and control of, such financial institutions, by means of false and fraudulent pretenses, representations, and promises, in violation of Title 18, United States Code, Section 1344.

(Title 18, United States Code, Section 1349.)

COUNT THREE
(Aggravated Identity Theft)

The United States Attorney further charges:

4. From at least in or about November 2016, up to and including at least in or about March 2017, in the Southern District of New York and elsewhere, MICHAEL BONANNO, the defendant; knowingly did transfer, possess, and use, without lawful authority, a means of identification of another person, during and in relation to a felony violation enumerated in Title 18, United States Code, Section 1028A(c), to wit, BONANNO used bank account numbers of other persons during and in relation to the bank fraud and conspiracy to commit bank fraud violations charged in Counts One and Two of this Information.

(Title 18, United States Code, Sections 1028A(a)(1),
1028A(b), and 2.)

FORFEITURE ALLEGATION

5. As a result of committing the offenses alleged in Counts One and Two of this Information, MICHAEL BONNANO, the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(2)(A), any and all property constituting or derived from proceeds obtained, directly or indirectly, as a result of the commission of said offenses, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to

the commission of said offenses that the defendant personally obtained.

Substitute Assets Provision

6. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

a. cannot be located upon the exercise of due diligence;

b. has been transferred or sold to, or deposited with, a third person;

c. has been placed beyond the jurisdiction of the Court;

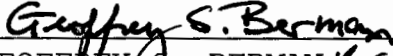
d. has been substantially diminished in value; or

e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) and Title 28, United States

Code, Section 2461(c), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Section 982;
Title 21, United States Code, Section 853; and
Title 28, United States Code, Section 2461.)



GEOFFREY S. BERMAN KC
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

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(18 U.S.C. §§ 1344, 1349, 1028A, 2.)

GEOFFREY S. BERMAN
United States Attorney.
