

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA : **CRIMINAL NO.** _____
v. : **DATE FILED:** _____
STEPHEN IANIERI : **VIOLATIONS:** **18 U.S.C. § 1344**
 : **(Bank fraud-3 Counts)**

INDICTMENT

COUNTS ONE THROUGH THREE

THE GRAND JURY CHARGES THAT:

At all times material to the Indictment:

1. Defendant STEPHEN IANIERI was a resident of Bucks County, Pennsylvania.
2. PNC Bank was a financial institution, the deposits of which were insured by the Federal Deposit Insurance Corporation (FDIC), certificate no. 6384.
3. From on or about October 30, 1996, through on or about December 9, 1996, in the Eastern District of Pennsylvania and elsewhere, defendant

STEPHEN IANIERI

knowingly executed and attempted to execute a scheme to defraud PNC Bank and to obtain monies owned by and under the care, custody, and control of PNC Bank by means of false and fraudulent pretenses, representations, and promises.

THE SCHEME

It was part of the scheme to defraud that:

4. On or about November 1, 1996, defendant STEPHEN IANIERI, using an assumed name and social security number, applied for and secured a fraudulent line of credit, account number 11 03 048006942428, in the amount of \$25,000, from PNC Bank, Philadelphia, Pennsylvania.

5. On or about the dates listed below, defendant STEPHEN IANIERI obtained two checks drawn on the line of credit account, as set forth below, and deposited them into his personal account at Summit Bank.

<u>Count</u>	<u>Check Date</u>	<u>Amount</u>
1	11/06/96	\$ 15,000
2	11/08/96	\$ 5,000

6. On or about December 9, 1996, defendant STEPHEN IANIERI wrote a worthless check in the amount set forth below, payable to the PNC Bank line of credit account, which check was returned to PNC Bank unpaid.

<u>Count</u>	<u>Check Date</u>	<u>Amount</u>
3	12/09/96	\$ 24,000

All in violation of Title 18, United States Code, Section 1344.

A TRUE BILL:

FOREPERSON

PATRICK L. MEEHAN
United States Attorney