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CLERK, U.S. DISTRICT COURT
12/2/2020
CENTRAL DISTRICT OF CALIFORNIA
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UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

September 2019 Grand Jury

UNITED STATES OF AMERICA,

Plaintiff,

v.

JEANETTE BERNARDETTE PAREDEZ,

Defendant.

ED CR. No. **CR20-00603 JAK**

I N D I C T M E N T

[18 U.S.C. § 1341: Mail Fraud; 26 U.S.C. § 7206(1): Making and Subscribing to a False Income Tax Return]

The Grand Jury charges:

INTRODUCTORY ALLEGATIONS

At times relevant to this Indictment:

1. Defendant JEANETTE BERNARDETTE PAREDEZ was employed by the Cal Poly Pomona Foundation, Inc. ("CPPF") in Los Angeles County, within the Central District of California. Defendant PAREDEZ served as an accounting specialist for the Kellogg West Conference Center and Hotel ("Kellogg West"), a facility that CPPF owned and used for conventions and events, also in Los Angeles County.
2. Defendant PAREDEZ's responsibilities as an accounting specialist included receiving invoices from Kellogg West vendors, verifying the invoices, and authorizing payment of the invoices.

1 Defendant PAREDEZ was then responsible for ensuring that the invoices
2 were entered into the CPPF processing system that generated payments
3 for those invoices.

4 3. Defendant PAREDEZ would take hard copies of the Kellogg
5 West invoices to the CPPF Accounting Department on a regular basis.
6 Once the CPPF Accounting Department received the invoices from
7 defendant PAREDEZ, the CPPF Accounting Department would then generate
8 checks for the vendors.

9 4. After the checks were ready, either defendant PAREDEZ would
10 pick up the checks from the CPPF Accounting Department or the CPPF
11 Accounting Department would mail them to defendant PAREDEZ at Kellogg
12 West.

13 5. Defendant PAREDEZ would then cause the checks to be mailed
14 to the designated vendors.

15 6. In order to receive payment from CPPF, a vendor would need
16 to have a vendor data record on file with CPPF. The vendor data
17 record would contain varying amounts of information for a person or
18 company, identifying who should ultimately receive payment for
19 services. A vendor would send a vendor data record to CPPF, after
20 which a CPPF employee would enter the information on the vendor data
21 record into the CPPF processing system.

22 7. These Introductory Allegations are incorporated into counts
23 One through Five of this Indictment.

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COUNTS ONE THROUGH FIVE

[18 U.S.C. §§ 1341, 2(b)]

A. THE SCHEME TO DEFRAUD

1. Beginning in July 2010 and continuing through February 2020, in Los Angeles County, within the Central District of California, and elsewhere, defendant JEANETTE BERNARDETTE PAREDEZ, knowingly and with intent to defraud, devised, participated in, and executed a scheme to defraud CPPF as to material matters, and to obtain money from CPPF, by means of materially false and fraudulent pretenses, representations, and promises, and the concealment of material facts, and which scheme affected a financial institution within the meaning of Title 18, United States Code, Section 20.

2. The fraudulent scheme operated and was carried out, in substance, in the following manner:

a. Defendant PAREDEZ entered, or caused to be entered, her mother, A.D., into the CPPF processing system as a Kellogg West vendor.

b. Defendant PAREDEZ generated fraudulent invoices stating that A.D. had performed services for Kellogg West, which was owned and operated by CPPF, when in fact, A.D. had not performed any such services for either Kellogg West or CPPF.

c. Defendant PAREDEZ authorized payments on those fraudulent invoices and entered the invoices into the CPPF processing system that generated payments on the invoices.

d. Defendant PAREDEZ took hard copies of the fraudulent invoices intended for payment to A.D. to the CPPF Accounting Department.

1 e. In reliance on the fraudulent invoices, the CPPF
2 Accounting Department generated checks drawn from a Wells Fargo Bank
3 checking account ("CPPF Wells Fargo account") and made payable to
4 A.D. ("fraudulent checks").

5 f. Defendant PAREDEZ would pick up the fraudulent checks
6 from the CPPF Accounting Department, or the CPPF Accounting
7 Department would mail the fraudulent checks to defendant PAREDEZ at
8 Kellogg West.

9 g. Defendant PAREDEZ had the fraudulent checks mailed to
10 A.D.'s address in Rowland Heights, California, where she would pick
11 them up.

12 h. Defendant PAREDEZ forged A.D.'s signature to endorse
13 the fraudulent checks.

14 i. Defendant PAREDEZ deposited the fraudulent checks with
15 the forged endorsements into a joint JPMorgan Chase Bank, N.A.
16 checking account, ending in 9900 and held by defendant PAREDEZ and
17 A.D. ("Chase Bank Account 9900").

18 j. Defendant PAREDEZ used the funds deposited in Chase
19 Bank Account 9900 for her own mortgage payments, credit card
20 payments, cash ATM withdrawals, and personal purchases.

21 k. As a result of this scheme, checks totaling
22 approximately \$925,486.99 were deposited in Chase Bank Account 9900.

23 B. USE OF THE MAILS

24 3. On or about the following dates, in Los Angeles County,
25 within the Central District of California, and elsewhere, for the
26 purpose of executing the above-described scheme to defraud, defendant
27 PAREDEZ willfully caused the following items to be placed in an
28 authorized depository for mail matter, and caused the following items

1 to be delivered by the Postal Service according to the directions
2 thereon:

COUNT	DATE	ITEM MAILED
ONE	January 15, 2016	Check in the amount of \$2,874.55, made payable to A.D., and drawn from the CPPF Wells Fargo account.
TWO	January 26, 2017	Check in the amount of \$2,897.03, made payable to A.D., and drawn from the CPPF Wells Fargo account.
THREE	January 16, 2018	Check in the amount of \$2,997.81, made payable to A.D., and drawn from the CPPF Wells Fargo account.
FOUR	January 11, 2019	Check in the amount of \$4,998.55, made payable to A.D., and drawn from the CPPF Wells Fargo account.
FIVE	January 22, 2020	Check in the amount of \$4,998.99, made payable to A.D., and drawn from the CPPF Wells Fargo account.

COUNTS SIX THROUGH ELEVEN

[26 U.S.C. § 7206(1), 18 U.S.C. § 2(b)]

On or about the following dates, in San Bernardino County, within the Central District of California, and elsewhere, defendant JEANETTE BERNARDETTE PAREDEZ willfully made and subscribed to a materially false United States Individual Income Tax Return, using either Form 1040 or 1040A, for the following calendar years, which defendant PAREDEZ verified by a written declaration that it was made under penalty of perjury, and caused such tax return to be filed with the Internal Revenue Service, and which defendant PAREDEZ did not believe to be true and correct as to every material matter contained therein, in that defendant PAREDEZ falsely claimed that her total income received during the indicated calendar year was the amount indicated below, when, as defendant PAREDEZ then knew, her total

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1 income received during the indicated calendar year was substantially
 2 more than the amount of total income she claimed:

COUNT	DATE	CALENDAR YEAR	TAX FORM AND LINE	TOTAL INCOME REPORTED
SIX	February 6, 2015	2014	1040A, Line 15	\$34,428
SEVEN	February 12, 2016	2015	1040A, Line 15	\$81,331 (joint)
EIGHT	February 10, 2017	2016	1040, Line 22	\$83,788 (joint)
NINE	February 23, 2018	2017	1040, Line 22	\$92,383 (joint)
TEN	February 21, 2019	2018	1040, Line 6	\$90,366 (joint)
ELEVEN	February 21, 2020	2019	1040, Line 7(b)	\$99,054 (joint)

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 12 A TRUE BILL

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 14 151
 15 Foreperson

16 NICOLA T. HANNA
 17 United States Attorney

18 *Brandon Fox*

19 BRANDON D. FOX
 20 Assistant United States Attorney
 Chief, Criminal Division

21 JERRY C. YANG
 22 Assistant United States Attorney
 Chief, Riverside Branch Office

23 NATASHA HANEY
 24 Assistant United States Attorney
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