

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	Criminal No. 23cr10165
)	
v.)	Violation:
)	
PABLO ROCHA,)	<u>Count One</u> : Bank Fraud
)	(18 U.S.C. § 1344)
)	
Defendant)	<u>Forfeiture Allegation</u> :
)	(18 U.S.C. § 982(a)(2))
)	
)	

INFORMATION

At all times relevant to this Information:

General Allegations

1. Defendant PABLO ROCHA (“ROCHA”) lived in Melrose, Massachusetts.
2. ROCHA worked as a Teller Supervisor at a bank in Malden, Massachusetts (“the Bank”).
3. The Bank was a financial institution within the meaning of Title 18, United States Code, Section 20.
4. The Federal Reserve Bank of Boston (“FRBB”) is a regional bank of the Federal Reserve System. The FRBB regulates and transacts with financial institutions in Massachusetts, including the Bank.

Overview of the Scheme to Defraud

5. Between July 2022 and December 2022, ROCHA engaged in a scheme to defraud his employer, the Bank, by misappropriating cash from the Bank’s vault and altering the Bank’s records to avoid detection.

Object and Purpose of the Scheme to Defraud

6. The object of the scheme to defraud was to obtain money by misappropriating cash from the Bank. The principal purpose of the scheme to defraud was to obtain money for the benefit of himself and others.

Manner and Means of the Scheme to Defraud

7. Among the manner and means by which ROCHA carried out the scheme to defraud were the following:

- a. accessing the Bank's vault and removing cash;
- b. writing false entries in the Bank's records to make it appear that there was more cash available in the vault than was in fact available; and
- c. processing fake transactions in the Bank's electronic records system to make it appear that cash had been shipped from the Bank to the FRBB, when no shipments had in fact occurred.

8. In this fashion, ROCHA misappropriated approximately \$375,000.

Acts in Furtherance of the Scheme to Defraud

9. Between July 2022 and December 2022, ROCHA committed and caused to be committed the following acts, among others, in furtherance of the scheme:

- a. On or about July 18, 2022, ROCHA wrote a false entry in the Bank's manual log to make it appear that there was approximately \$122,000 in cash in the vault that was not in fact there.

b. On or about August 23, 2022, ROCHA wrote a false entry in the Bank's manual log to make it appear that there was approximately \$230,000 in cash in the vault that was not in fact there.

c. On or about September 21, 2022, ROCHA processed a fake transaction in the Bank's electronic records system to make it appear that \$308,000 in cash had been sent from the Bank to the FRBB.

d. On or about November 18, 2022, after the Bank identified that the \$308,000 transfer had not occurred, ROCHA processed another fake transaction in the Bank's electronic records system to make it appear that a \$362,000 in cash had been sent from the Bank to the FRBB.

e. On or about December 8, 2022, after the Bank identified that the \$362,000 transfer had not occurred, ROCHA processed another fake transaction in the Bank's electronic records system to make it appear that \$375,000 in cash had been sent from the Bank to the Federal Reserve.

COUNT ONE
Bank Fraud
(18 U.S.C. § 1344)

The United States Attorney alleges:

10. The United States re-alleges and incorporates by reference paragraphs 1 through 9(e) of this Information.

11. From in or about July 2022 to in or about December 2022, in the District of Massachusetts and elsewhere, the defendant,

PABLO ROCHA,

did knowingly execute, and attempt to execute, a scheme and artifice to defraud his employer, a financial institution, and to obtain moneys, funds, credits, assets, securities and other property owned by and under its custody and control by means of materially false and fraudulent pretenses, representations, and promises,

In violation of Title 18, United States Code, Section 1344.

FORFEITURE ALLEGATION
18 U.S.C. § 982(a)(2)(A)

The United States Attorney further alleges:

12. Upon conviction of the offense in violation of Title 18, United States Code, Section 1344, set forth in Count One, the defendant,

PABLO ROCHA,

shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(2)(A), any property constituting, or derived from, proceeds obtained directly or indirectly, as a result of such offense. The property to be forfeited includes, but is not limited to, the following assets:

a. a forfeiture money judgment in the amount of \$375,000;

13. If any of the property described in Paragraph 12, above, as being forfeitable pursuant to Title 18, United States Code, Section 982(a)(2), 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 party;

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 divided without difficulty;

it is the intention of the United States, pursuant to Title 18, United States Code, Section 982(b), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property described in Paragraph 12, above.

All pursuant to Title 18, United States Code, Section 982(a)(2).

JOSHUA S. LEVY
ACTING UNITED STATES ATTORNEY

By: /s/ Christopher J. Markham
CHRISTOPHER J. MARKHAM
ASSISTANT UNITED STATES ATTORNEY
DISTRICT OF MASSACHUSETTS

DATE: June 25, 2023