

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA	:	CRIMINAL NO.
	:	
v.	:	
	:	
WENDY VILLATORO,	:	VIOLATION:
	:	18 U.S.C. § 1344
Defendant.	:	(Bank Fraud)
	:	
	:	FORFEITURE:
	:	18 USC 982(a)(2)(A), 21 USC 853(p), 28
	:	U.S.C. § 2461(c)

INFORMATION

The United States Attorney charges that:

COUNT ONE

On or about March 31, 2020, and continuing through at least in or around August 4, 2021, within the District of Columbia, the defendant, **WENDY VILLATORO** did knowingly and intentionally execute and/or attempt to execute a scheme or artifice to defraud a financial institution that was then insured by the Federal Deposit Insurance Corporation and to obtain money, funds, assets, securities, and other property owned by and under the custody and control of a financial institution by means of materially false or fraudulent pretenses, representations, and promises.

(Bank Fraud, in violation of Title 18, United States Code, Section 1344)

FORFEITURE ALLEGATION

Upon conviction of any of the offense alleged in Count One, the defendant shall forfeit to the United States any property, real or personal, which constitutes or is derived from proceeds traceable to the offense, pursuant to 18 U.S.C. § 982(a)(2)(A) and 28 U.S.C. § 2461(c). The United States will seek a forfeiture money judgment against the defendant in an amount equal to the value of any property, real or personal, which constitutes or is derived from proceeds traceable to the offense.

If any of the property described above as being subject to forfeiture, 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 that cannot be divided without difficulty;

the defendant shall forfeit to the United States any other property of the defendant, up to the value of the property described above, pursuant to 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. § 982(b).

(Criminal Forfeiture, pursuant to Title 18, United States Code, Section 982(a)(2)(A), Title 28, United States Code, Section 2461(c), and Title 21, United States Code, Section 853(p))

Respectfully submitted,

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