

STATE OF FLORIDA
OFFICE OF FINANCIAL REGULATION



IN RE:
NAZREEN MOHAMMED

Admin. Proceeding No.: 0809-FI-12/10

EMERGENCY ORDER OF SUSPENSION AND PROHIBITION
WITH NOTICE OF RIGHTS

The State of Florida, Office of Financial Regulation (hereinafter "Office"), gives notice that it, having determined that Nazreen Mohammed (hereinafter "Mohammed"), a financial institution-affiliated party, has entered a plea of guilty to felony violations involving bank fraud, files this Emergency Order of Suspension and Prohibition with Notice of Rights (hereinafter "Emergency Order"), pursuant to the provisions of Sections 655.012 and 655.037(6)(b), Florida Statutes, against Mohammed, immediately suspending Mohammed from serving as an employee of Fairwinds Credit Union ("Credit Union"), and as a financial institution-affiliated party of any state financial institution, subsidiary, or service corporation, and immediately prohibiting Mohammed from participation in any manner in the affairs of any state financial institution, subsidiary, or service corporation.

STATEMENT OF FACTS AND CONCLUSIONS OF LAW

1. Fairwinds Credit Union is a state chartered credit union, charter number 665, with its principal place of business at 135 West Central Boulevard, Orlando, Florida 32801, and is a state financial institution, as the term is defined in Section 655.005(1)(p), Florida Statutes.
2. Between April 17, 2009 and July 18, 2009, Mohammed was an employee of the Credit Union, making her a financial institution-affiliated party as that term is defined in Section 655.005(1)(i), Florida Statutes.

3. During her tenure at the Credit Union, Mohammed was a Financial Services Representative (loan officer) with access to personal and account information pertaining to elderly individuals and the estates of deceased individuals with accounts at the Credit Union.
4. On October 13, 2010, the Office of the United States Attorney, Middle District of Florida, filed with the court a five count indictment alleging Mohammed committed several crimes while in the employ of the Credit Union and, later, at Royal Bank of Canada.
5. The case, styled United States of America v. Nazreen Mohammed was assigned case number 6:10-cr-276-Orl-28DAB. The indictment, which is attached as Exhibit 1, is hereby incorporated by reference as if set forth in its entirety.
6. On November 5, 2010, Mohammed entered into a plea agreement with the Office of the United States Attorney in which she agreed to plead guilty to three of the five counts in the indictment.
7. The Court accepted Mohammed's guilty plea and adjudicated her guilty of Counts I, III, and V of the indictment on November 24, 2010. The Order accepting the plea and adjudicating Mohammed guilty of Counts I, III and V is attached as Exhibit 2.
8. Counts I and V charge Mohammed with using personal and account information of members of the Credit Union to fraudulently obtain money from their accounts by making unauthorized cash withdrawals and negotiating unsecured loans in violation of 18 U.S.C. § 1344. Count III involves Mohammed's fraudulent activity while employed by Royal Bank of Canada.
9. Violations of 18 U.S.C. § 1344 are felonies punishable by up to thirty (30) years in prison per charge.
10. The Office is responsible for the enforcement of the laws governing financial institutions

authorized or chartered by the State of Florida, and financial institution-affiliated persons associated with such institutions, including, but not limited to, employees. §§ 655.001, 655.005(1)(i) and (j), 655.012, 655.037(1), (6)(b), and (8), Fla. Stat.

11. Mohammed's resignation, termination of employment or participation, or separation from the Credit Union does not affect the jurisdiction and authority of the Office to issue any notice and proceed against Mohammed under Section 655.037, Florida Statutes. Section 655.037(8) states:

The resignation, termination of employment or participation, or separation from a state financial institution, subsidiary, or service corporation of the financial institution-affiliated party does not affect the jurisdiction and authority of the office to issue any notice and proceed under this section against such financial institution-affiliated party, if such notice is served before the end of the 6-year period beginning on the date such person ceases to be such a financial institution-affiliated party with respect to such state financial institution, subsidiary, or service corporation.

12. Section 655.037(6)(b), Florida Statutes, states, in pertinent part:

Whenever any financial institution-affiliated party is charged with a felony in a state or federal court, or in the courts of any foreign country with which the United States maintains diplomatic relations, and such charge alleges violation of any law involving fraud, currency transaction reporting, money laundering, theft, or moral turpitude and the charge under such foreign law is equivalent to a felony charge under state or federal law, the office may enter an emergency order suspending such financial institution-affiliated party or restricting or prohibiting participation by such financial institution-affiliated party in the affairs of that particular state financial institution, subsidiary, or service corporation or any other financial institution, subsidiary, or service corporation, upon service of the order upon the state financial institution, subsidiary, or service corporation and the financial institution-affiliated party so charged.

13. The possibility of Mohammed again gaining employment as a financial institution-affiliated party of a state financial institution, subsidiary or service corporation, poses a threat to the interests of the state financial institution, subsidiary, or service corporation, and poses a threat to the interests of the state financial institution's, subsidiary's, or service corporation's

depositors, members, or stockholders. Furthermore, Mohammed again gaining employment as a financial institution-affiliated party of a state financial institution, subsidiary, or service corporation impairs public confidence in the state financial institution, subsidiary, or service corporation, and the state financial institution system in general.

14. Although it is unnecessary to find or demonstrate that an immediate danger to the public health, safety, or welfare exists in the context of an emergency suspension and prohibition pursuant to the provisions of Section 655.037(6)(b), Florida Statutes, the Office nevertheless finds that an immediate danger to the public welfare exists.
15. Although it is unnecessary to find or demonstrate that the reasons for concluding that the procedures employed herein are fair under the circumstances, since this action is in the context of an emergency suspension and prohibition pursuant to the provisions of Sections 655.012(3) and 655.037(6)(b), Florida Statutes, the Office nevertheless finds that the procedures used are fair, since the Office has merely used the procedures contained within the provisions of Sections 655.012(3) and 655.037(6)(b), Florida Statutes.
16. The Office concludes that this Emergency Order is appropriate and authorized pursuant to Section 655.037(6)(b), Florida Statutes, because Mohammed has pled guilty to committing felonies involving bank fraud while she was a financial institution affiliated party.
17. The Office further concludes, pursuant to Section 655.0321, Florida Statutes, that this Emergency Order shall be a public document, and should Mohammed request a post-suspension Hearing or appeal this Emergency Order, said hearings and proceedings shall be conducted as public proceedings, and that all documents related to such hearing be public documents unless subject to a protective order or made confidential pursuant to federal or Florida law.

AGENCY ACTION

Based on the foregoing Statement of Facts and Conclusions of Law, it is ORDERED that:

a. Mohammed is hereby IMMEDIATELY suspended from any and all positions she holds at any state financial institution, subsidiary, or service corporation.

b. Mohammed is hereby IMMEDIATELY suspended from serving in the capacity of a financial institution-affiliated party, as the term is defined in Section 655.005(1)(i), Florida Statutes, of any state financial institution, subsidiary, or service corporation she may be a financial institution-affiliated party of.

c. Mohammed is hereby IMMEDIATELY prohibited from serving in the capacity of a financial institution-affiliated party, as the term is defined in Section 655.005(1)(i), Florida Statutes, of any state financial institution, subsidiary, or service corporation.

d. Mohammed is hereby IMMEDIATELY prohibited from participation in any manner in the affairs of any state financial institution, subsidiary, service corporation, or affiliate. This prohibition includes, but is not limited to, matters of corporate governance and the following prohibitions regarding stock ownership, transfer, and voting:

(1) Mohammed shall not vote any stock she owns or controls in any state financial institution, any subsidiary, service corporation or any affiliate, without the prior written permission of the Office.

(2) Mohammed shall not solicit, procure, vote, or attempt to vote any proxy, consent, or authorization with respect to any voting rights in any state financial institution, or any subsidiary, service corporation or affiliate.

(3) Mohammed shall not solicit or procure any additional stock in any other state financial institution, or any subsidiary, service corporation or affiliate.

(4) Mohammed shall not transfer or attempt to transfer: a) any stock she owns or controls in any state financial institution, or any subsidiary, service corporation or affiliate, without the prior written permission of the Office; or b) any proxy, consent, or authorization with respect to any voting rights in any state financial institution, or any subsidiary, service corporation or affiliate, without the prior written permission of the Office.

e. Mohammed is hereby IMMEDIATELY suspended from serving as a consultant or independent contractor for any state financial institution, or any subsidiary, service corporation or affiliate.

f. Mohammed is hereby IMMEDIATELY prohibited from serving as a consultant or independent contractor, or other similar position, for any state financial institution, or any subsidiary, service corporation or affiliate, unless, prior to accepting appointment with, and prior to providing any services to, any state financial institution, subsidiary or service corporation as a consultant or independent contractor, or other similar position:

(1) Mohammed provides a copy of this Emergency Order to the chief executive officer of the state financial institution, subsidiary, service corporation or affiliate, with which Mohammed seeks to serve as a consultant or independent contractor, or other similar position; and

(2) Mohammed, and the chief executive officer and the chairman of the board of directors of the state financial institution, or subsidiary, service corporation or affiliate, with which Mohammed seeks to serve as a consultant or independent contractor, or other similar position, provides written notification to the Office describing in detail the duties and responsibilities of the services Mohammed desires to provide to the state financial institution, or subsidiary, service corporation or affiliate; and

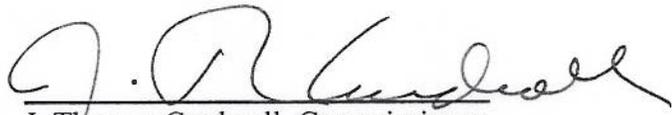
(3) the Office, in its sole discretion, authorizes Mohammed to accept appointment with the state financial institution, or subsidiary, service corporation or affiliate, as a consultant or independent contractor, or other similar position.

g. The Office will only rescind or otherwise modify this Emergency Order upon the issuance of an Office order finding that Mohammed has demonstrated through a post suspension hearing that her continued service to or participation in the affairs of the state financial institution, subsidiary, or service corporation does not pose a threat to the interests of the state financial institution's depositors, members, or stockholders, or threaten to impair public confidence in the state financial institution.

h. This Emergency Order will remain in effect, unless otherwise rescinded or modified by Office order.

i. This Emergency Order will dissolve in the event of an acquittal, or the final, unappealed dismissal of all charges against Mohammed. However, such dissolution does not prohibit the Office from instituting proceedings under Section 655.037(1), Florida Statutes.

DONE AND ORDERED in Tallahassee, Florida, this 13th day of December, 2010.


J. Thomas Cardwell, Commissioner
Office of Financial Regulation

NOTICE OF RIGHTS

NOTICE IS HEREBY PROVIDED THAT THE FOREGOING EMERGENCY ORDER IS ENTERED PURSUANT TO SECTION 655.037(6)(b), FLORIDA STATUTES, AND IS ACCORDINGLY EFFECTIVE IMMEDIATELY. MOHAMMED IS ENTITLED TO JUDICIAL REVIEW PURSUANT TO SECTION 120.68, FLORIDA STATUTES. REVIEW PROCEEDINGS ARE GOVERNED BY THE FLORIDA RULES OF APPELLATE PROCEDURE. SUCH PROCEEDINGS ARE COMMENCED BY FILING THE ORIGINAL NOTICE OF APPEAL WITH THE AGENCY CLERK FOR THE OFFICE OF FINANCIAL REGULATION AS FOLLOWS:

By Mail or Facsimile

Office of Financial Regulation
P.O. Box 8050
Tallahassee, Florida 32314-8050
Phone: (850) 410-9800
Fax: (850) 410-9548

OR

By Hand Delivery

Office of Financial Regulation
General Counsel's Office
The Fletcher Building, Suite 118
101 East Gaines Street
Tallahassee, Florida 32399-0379
Phone: (850) 410-9896

A COPY OF THE NOTICE OF APPEAL, ACCOMPANIED BY THE FILING FEES AS REQUIRED BY LAW, MUST ALSO BE FILED WITH THE DISTRICT COURT OF APPEAL, FIRST DISTRICT, 301 S. MARTIN LUTHER KING, JR., BOULEVARD, TALLAHASSEE, FLORIDA 32399-1850, OR WITH THE DISTRICT COURT OF APPEAL IN THE APPELLATE DISTRICT WHERE THE PARTY RESIDES. **THE NOTICE OF APPEAL MUST BE FILED WITH BOTH THE AGENCY CLERK FOR THE OFFICE OF FINANCIAL REGULATION AND THE DISTRICT COURT OF APPEAL WITHIN 30 DAYS OF THE RENDITION OF THE ORDER TO BE REVIEWED.**

MOHAMMED MAY ALSO REQUEST A POST-SUSPENSION HEARING TO BE CONDUCTED IN ACCORDANCE WITH THE PROVISIONS OF SECTIONS 120.569 and

120.57, FLORIDA STATUTES. REQUESTS FOR SUCH A POST-SUSPENSION HEARING MUST COMPLY WITH THE PROVISIONS OF RULE 28-106.104(2) AND RULE 28-106.2015(5) FLORIDA ADMINISTRATIVE CODE, AND MUST BE FILED WITH:

By Mail or Facsimile

OR

By Hand Delivery

Office of Financial Regulation
P.O. Box 8050
Tallahassee, Florida 32314-8050
Phone: (850) 410-9800
Fax: (850) 410-9548

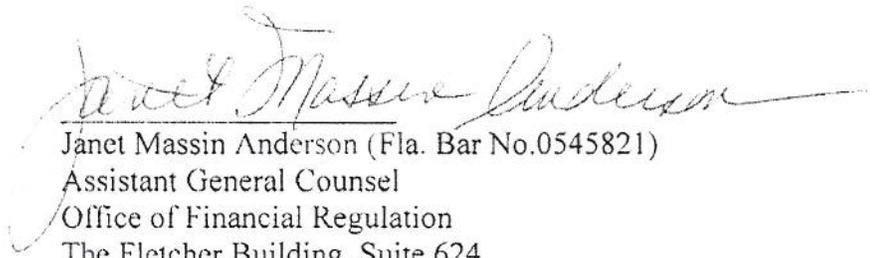
Office of Financial Regulation
General Counsel's Office
The Fletcher Building, Suite 118
101 East Gaines Street
Tallahassee, Florida 32399-0379
Phone: (850) 410-9896

WITHIN TWENTY-ONE (21) DAYS AFTER MOHAMMED, OR HER AGENT OR REPRESENTATIVE, RECEIVES THIS ORDER. SHOULD MOHAMMED REQUEST A POST-SUSPENSION HEARING, SHE WILL HAVE THE RIGHT TO BE REPRESENTED BY COUNSEL OR OTHER QUALIFIED REPRESENTATIVE; TO OFFER TESTIMONY, EITHER WRITTEN OR ORAL; TO CALL AND CROSS EXAMINE WITNESSES; AND TO HAVE SUBPOENAS AND SUBPOENAS DUCES TECUM ISSUED ON HER BEHALF. FAILURE TO RESPOND WITHIN TWENTY ONE (21) DAYS OF RECEIPT OF THIS EMERGENCY ORDER SHALL BE DEEMED A WAIVER OF ALL RIGHTS TO A POST-SUSPENSION HEARING AND THIS EMERGENCY ORDER SHALL, WITHOUT FURTHER NOTICE REMAIN IN EFFECT.

NOTE THAT THE ACQUITTAL OF THE FINANCIAL INSTITUTION-AFFILIATED PARTY CHARGED, OR THE FINAL UNAPPEALED DISMISSAL OF ALL CHARGES AGAINST SUCH PERSON, WILL DISSOLVE THE EMERGENCY ORDER, BUT WILL NOT PROHIBIT THE OFFICE FROM INSTITUTING PROCEEDINGS UNDER SECTION 655.037(1), FLORIDA STATUTES. PURSUANT TO SECTION 120.73, FLORIDA STATUTES, MOHAMMED IS ADVISED THAT MEDIATION IS NOT AVAILABLE.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Emergency Order of Suspension and Prohibition with Notice of Rights has been furnished via Certified U.S. Mail, Delivery to Addressee Only, return receipt requested, to: Nazreen Mohammed, 5375 SE 145th Street, Summerfield, Florida 34491, and Larry F. Tobin, President and Chief Executive Officer, Fairwinds Credit Union, 135 West Central Boulevard, Orlando, Florida 32801 this 13 day of December, 2010.



Janet Massin Anderson (Fla. Bar No.0545821)
Assistant General Counsel
Office of Financial Regulation
The Fletcher Building, Suite 624
200 East Gaines Street
Tallahassee, Florida 32399-0371
Tel: 850-410-9800

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
ORLANDO DIVISION

UNITED STATES OF AMERICA

-vs-

Case No. 6:10-cr-276-Orl-28DAB

NAZREEN MOHAMMED

ACCEPTANCE OF PLEA OF GUILTY AND ADJUDICATION OF GUILT

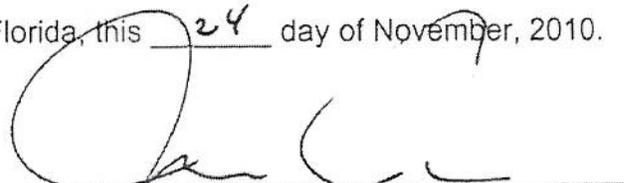
This case having been considered by the Court on the Report and Recommendation Concerning Plea of Guilty (Doc. No. 20, filed November 22, 2010) and no objection thereto having been filed, it is **ORDERED**

1. The Report and Recommendation of the United States Magistrate Judge (Doc. No. 20) is **ACCEPTED, AFFIRMED** and **ADOPTED**.

2. Defendant has knowingly, intelligently and voluntarily entered a plea of guilty to Counts One, Three and Five of the Indictment. Such plea is accepted, and Defendant is adjudicated guilty of Counts One, Three and Five of the Indictment.

3. The Plea Agreement (Doc. No. 15, filed November 5, 2010) is accepted.

DONE and **ORDERED** at Orlando, Florida, this 24 day of November, 2010.


JOHN ANTOON II
United States District Judge

Copies to:
U. S. Magistrate Judge
United States Marshal
United States Attorney
United States Probation Office
United States Pretrial Services Office
Counsel for Defendant
Courtroom Deputy Clerk
Nazreen Mohammed



UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
ORLANDO DIVISION

UNITED STATES OF AMERICA

v.

NAZREEN MOHAMMED

CASE NO. 6:10-cr-276-Orl-28-DAB
18 U.S.C. § 1344
18 U.S.C. § 657
18 U.S.C. § 656
18 U.S.C. § 1028A(a)(1)
18 U.S.C. § 982 - Forfeiture

INDICTMENT

The Grand Jury charges:

COUNT ONE

A. Introduction

At times material to this Indictment:

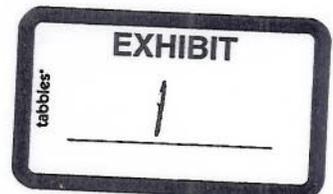
1. The Defendant, NAZREEN MOHAMMED, is an individual who resides in the Middle District of Florida. NAZREEN MOHAMMED was employed as a Financial Services Representative (loan officer) with Fairwinds Credit Union, and at all pertinent times worked in Lake County, in the Middle District of Florida. In her capacity as a Financial Services Representative, NAZREEN MOHAMMED had access to the accounts and records of individuals who maintained banking relationships with Fairwinds Credit Union.

2. Fairwinds Credit Union is a financial institution as defined by 18 U.S.C. § 20; that is, Fairwinds Credit Union is an insured depository institution with deposits insured by the National Credit Union Administration Board (NCUAB).

3. V.L.S. is an elderly individual who resides in the Middle District of Florida

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U.S. DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
ORLANDO, FL

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and was a customer of Fairwinds Credit Union.

4. V.A.S. is an elderly individual who resides in the Middle District of Florida and was a banking customer of Fairwinds Credit Union.

5. M.Q. is a deceased individual who resided in the Middle District of Florida and was a banking customer of Fairwinds Credit Union.

6. B.W. is an individual who resides in the Middle District of Florida and was a banking customer of Fairwinds Credit Union.

7. S.M. is an individual who resides in the Middle District of Florida and was a banking customer of Fairwinds Credit Union.

8. R.L. is an individual who resides in the Middle District of Florida and was a banking customer of Fairwinds Credit Union.

9. Y.M. is an individual who resides in the Middle District of Florida and was a banking customer of Fairwinds Credit Union.

10. E.M. is an individual who resides in the Middle District of Florida and was a banking customer of Fairwinds Credit Union.

11. D. R.H. is an individual who resides in the Middle District of Florida and was a banking customer of Fairwinds Credit Union.

12. D.M.H. is an individual who resides in the Middle District of Florida and was a banking customer of Fairwinds Credit Union.

13. R.A. is an individual who resides in the Middle District of Florida and was a banking customer of Fairwinds Credit Union.

14. L.S. is an individual who resides in the Middle District of Florida and was a banking customer of Fairwinds Credit Union.

15. R.S. is an individual who resides in the Middle District of Florida and was a banking customer of Fairwinds Credit Union.

B. Scheme and Artifice

From between in or about April 17, 2009, and in or about July 18, 2009, the defendant, NAZREEN MOHAMMED, knowingly executed a scheme and artifice to defraud and cause to be defrauded Fairwinds Credit Union, a financial institution, and to obtain and cause to be obtained moneys, funds, credits, assets, and other property owned by and under the custody and control of Fairwinds Credit Union, a financial institution, by means of false and fraudulent pretenses and representations.

C. Manner and Means

1. It was part of the scheme and artifice that the defendant, NAZREEN MOHAMMED, in her capacity as a Financial Services Representative (loan officer) with Fairwinds Credit Union, became aware of, and obtained personal account information pertaining to the banking accounts of, elderly and deceased individuals who maintained their banking relationships with Fairwinds Credit Union.

2. It was a further part of the scheme and artifice that the defendant, NAZREEN MOHAMMED, would then use the information described in paragraph C.1. to access the banking accounts of the elderly and deceased individuals and conduct unauthorized, false and fraudulent transactions from those accounts under various false pretenses. The unauthorized, false and fraudulent transactions included unsecured loans against certificates of deposit and withdrawals from savings and money market accounts, all without the knowledge, consent and authority of the elderly and deceased individuals.

3. It was a further part of the scheme and artifice that the defendant, NAZREEN MOHAMMED, would alter the account contact information of the elderly individuals.

4. It was a further part of the scheme and artifice that the defendant, NAZREEN MOHAMMED, posing as the elderly and deceased individuals, would contact the Fairwinds Credit Union telephone call center in Orange County, Florida, in order to check the status of the false and fraudulent transactions.

5. It was a further part of the scheme and artifice that the defendant, NAZREEN MOHAMMED, would create an unauthorized savings account in the names of L.S. and R.S.

6. It was a further part of the scheme and artifice that the defendant, NAZREEN MOHAMMED, would deposit and cause to be deposited the proceeds of the false and fraudulent transactions described in paragraph C.2., above, into the accounts of other victims, B.W., S.M., R.L., Y.M., E.M., D.R.H., D.M.H., R.A., L.S. and R.S., before having the funds withdrawn in the form of cash, counter checks and electronic fund transfers into accounts over which NAZREEN MOHAMMED had access at Fairwinds Credit Union, with the last four digits of 4726 and 4677, thereby obtaining the funds from the false and fraudulent transactions for the use and benefit of herself and others.

7. It was a further part of the scheme and artifice that the defendant, NAZREEN MOHAMMED, obtained and attempted to obtain not less than \$127,431.81 from the Fairwinds Credit Union accounts of V.L.S., V.A.S., and M.Q.

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

COUNT TWO

Between in or about April 17, 2009, and in or about July 18, 2009, in Orange and Lake Counties, Florida, in the Middle District of Florida, and elsewhere,

NAZREEN MOHAMMED

the defendant herein, being an employee of Fairwinds Credit Union, the credit union deposits of which are insured by the National Credit Union Administration Board (NCUAB), did knowingly and with intent to defraud, embezzle and willfully misapply moneys, funds, credits, assets, and securities, belonging to and entrusted to Fairwinds Credit Union, the sum having a value greater than \$1,000.

All in violation of Title 18, United States Code, Section 657.

COUNT THREE

A. Introduction

At times material to this Indictment:

1. The Defendant, NAZREEN MOHAMMED, is an individual who resides in the Middle District of Florida. NAZREEN MOHAMMED was employed as a Senior Relationship Banker with Royal Bank of Canada, and at all pertinent times, worked in Lake County, in the Middle District of Florida. In her capacity as a Senior Relationship Banker, NAZREEN MOHAMMED had access to the accounts and records of individuals who maintained banking relationships with Royal Bank of Canada.

2. Royal Bank of Canada is a financial institution as defined by 18 U.S.C. § 20; that is, Royal Bank of Canada is an insured depository institution with deposits insured by the Federal Deposit Insurance Corporation (FDIC).

3. M.R. is an elderly individual who resides in the Middle District of Florida and was a customer of Royal Bank of Canada.

4 J.R. is a an individual who resides in the Middle District of Florida and was a customer of Royal Bank of Canada.

5. J.S. is an elderly individual who resides in the Middle District of Florida and was a banking customer of Royal Bank of Canada.

6. C.M. is an elderly individual who resides in the Middle District of Florida and was a banking customer of Royal Bank of Canada.

7. J.H. is an individual who resides in the Middle District of Florida and was a banking customer of Royal Bank of Canada.

8. B.A. is a deceased individual who resided in the Middle District of Florida and was a banking customer of Royal Bank of Canada.

9. J.C. is a deceased individual who resided in the Middle District of Florida and was a banking customer of Royal Bank of Canada.

10. O.L. is an elderly individual who resides in the Middle District of Florida and was a banking customer of Royal Bank of Canada.

11. E.E. is an individual who resides outside of the Middle District of Florida was a banking customer of Royal Bank of Canada.

12. Lifeline ISAG, Inc., is a Florida non-profit corporation for which the defendant, NAZREEN MOHAMMED, serves as president and registered agent for service of process.

B. Scheme and Artifice

From between in or about November 5, 2009, and in or about January 7, 2010, the defendant, NAZREEN MOHAMMED, knowingly executed a scheme and artifice to defraud, and did cause to be defrauded, Royal Bank of Canada, a financial institution, and to obtain and cause to be obtained moneys, funds, credits, assets, and other property owned by and under the custody and control of Royal Bank of Canada, a financial institution, by means of false and fraudulent pretenses and representations.

C. Manner and Means

1. It was part of the scheme and artifice that the defendant, NAZREEN MOHAMMED, in her capacity as a Senior Relationship Banker with Royal Bank of Canada, became aware of, and obtained personal account information pertaining to the banking accounts of elderly, deceased and other individuals who maintained their banking relationships with Royal Bank of Canada.

2. It was further a part of the scheme and artifice that the defendant, NAZREEN MOHAMMED, would then use the information described in paragraph C.1. to access the banking accounts of elderly and deceased customers and conduct unauthorized, false and fraudulent transactions from those accounts under various false pretenses. The unauthorized, false and fraudulent transactions included withdrawals from checking accounts, change of account beneficiary information and inter-account transfers of funds, all without the knowledge, consent and authority of the elderly and deceased individuals.

3. It was a further part of the scheme and artifice that the defendant, NAZREEN MOHAMMED, would alter the account contact information of the elderly

individuals in carrying out the scheme and artifice to defraud.

4. It was a further part of the scheme and artifice that the defendant, NAZREEN MOHAMMED, would create an unauthorized account in the name of E.E. in carrying out the scheme and artifice.

5. It was a further part of the scheme and artifice that the defendant, NAZREEN MOHAMMED, would create a checking account at Royal Bank of Canada for the Florida non-profit corporation, Lifeline ISAG, Inc., into which she transferred the funds from one of C.M.'s certificates of deposit without C.M.'s authorization or approval.

6. It was a further part of the scheme and artifice that the defendant, NAZREEN MOHAMMED, would obtain and deposit a fraudulent check from J.H. into another Lifeline ISAG, Inc., checking account at M & I bank.

7. It was a further part of the scheme and artifice that the defendant, NAZREEN MOHAMMED, would deposit and cause to be deposited the proceeds of the false and fraudulent transactions described in paragraph C.2., above, into the accounts of E.E., J.S. and B.A., before having the funds withdrawn in the form of cash and counter checks, thereby obtaining the funds from the false and fraudulent transactions for the use and benefit of herself and others.

6. It was a further part of the scheme and artifice that the defendant, NAZREEN MOHAMMED, obtained and attempted to obtain not less than \$302,581.53. from the Royal Bank of Canada accounts of M.R., C.M., J.H., and O.L.

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

COUNT FOUR

Between in or about November 5, 2009, and in or about January 7, 2010, in Lake County, Florida, in the Middle District of Florida, and elsewhere,

NAZREEN MOHAMMED

the defendant herein, being an employee of Royal Bank of Canada (RBC), the bank deposits of which are insured by the Federal Deposit Insurance Corporation, did knowingly and with intent to defraud, embezzle and willfully misapply moneys, funds, credits, assets, and securities, belonging to and entrusted to RBC, the sum having a value greater than \$1,000.

All in violation of Title 18, United States Code, Section 656.

COUNT FIVE

On or about December 22, 2009, in Lake County, Florida, in the Middle District of Florida, and elsewhere,

NAZREEN MOHAMMED

the defendant herein, did knowingly possess and use, without lawful authority, a means of identification of another person during and in relation to the commission of the felony offense of bank fraud, in violation of Title 18, United States Code, Section 1344, as described in Counts One and Three of this Indictment, and theft and embezzlement by a bank employee, in violation of Title 18, United States Code, Section 656, as described in Count Four of this Indictment, to wit: the defendant used the name, date of birth, and social security number of RBC customer E.E. to open an unauthorized bank account.

All in violation of Title 18, United States Code, Section 1028A(a)(1).

FORFEITURE

1. The allegations contained in Counts One through Four of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to the provisions of Title 18, United States Code, Section 982(a)(2)(A).

2. The defendant, **NAZREEN MOHAMMED**, shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 982(a)(2)(A), any and all right, title, and interest she has in any property constituting, or derived from, proceeds the person obtained directly or indirectly, as a result of such violations of Title 18, United States Code, Sections 656, 657, and 1344.

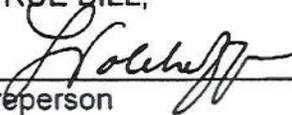
3. If any of the property described above, as a result of any act or omission of the defendant:

- 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,

the United States of America shall be entitled to forfeiture of substitute property under

the provisions of Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1).

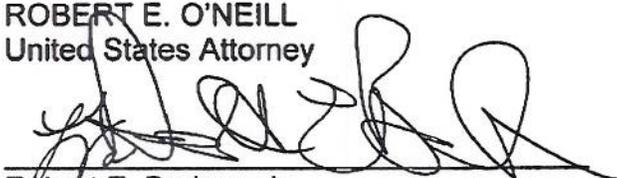
A TRUE BILL,



Foreperson

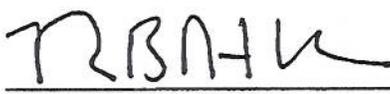
ROBERT E. O'NEILL
United States Attorney

By:



Robert E. Bodnar, Jr.
Assistant United States Attorney

By:



Roger B. Handberg
Assistant United States Attorney
Chief, Orlando Division