

**UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA : **CRIM. NO. 1:21-CR-**
 :
v. :
 :
CHRISTINA MCCONNELL :
Defendant. :

I N F O R M A T I O N

THE UNITED STATES ATTORNEY CHARGES:

COUNTS 1-2
18 U.S.C. § 1957 – Illegal Monetary Transactions

On or about the dates set forth below, in the Middle District of Pennsylvania, and elsewhere, defendant

CHRISTINA MCCONNELL

knowingly engaged in the following monetary transactions by, through, or to financial institutions, affecting interstate or foreign commerce, in criminally derived property of a value greater than \$10,000.00, that is the withdrawals, exchanges, and transfers of U.S. currency described below, such property having been derived from a specified unlawful activity, that is, wire fraud in violation of Title 18 United States Code, Section 1343 which involved monies fraudulently obtained from the U.S. Small Business Administration’s Paycheck Protection Program (PPP),

enacted as part of the Coronavirus Aid, Relief, and Economic Security (CARES) Act:

Count	On or about date	Monetary Transaction	Amount
1	06.16.20	Withdrawal of funds from PNC Bank account ending xxx5189 in the form of two cashier's checks	\$37,000.00
2	07.09.20	Wire transfer of funds from PNC Bank account ending xxx5189	\$195,300.00

All in violation of Title 18, United States Code, Section 1957.

FORFEITURE ALLEGATION

1. The allegations contained in Counts 1 and 2 of this Information are hereby realleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 982(a)(1).

2. Pursuant to Title 18, United States Code, Section 982(a)(1), upon conviction of the offenses in violation of Title 18, United States Code, Section 1957, as set forth in Counts 1 and 2 of this Information, defendant

CHRISTINA MCCONNELL

shall forfeit to the United States of America any property real or personal, involved in such offenses, or property traceable to such property, and property constituting or derived from any proceeds obtained, directly or indirectly, as the result of said offenses. The property to be forfeited includes, but is not limited to:

- a. real property located at 699 Barnstable Road, Carlisle, PA, 17015, with a legal description of:

ALL THOSE CERTAIN two tracts of land situate in West Pennsboro Township, Cumberland County, Pennsylvania, more particularly bounded and described in accordance with survey of Larry V. Neidlinger, P.E., dated June 26, 1983, recorded in Cumberland County Plan Book 43, Page 143, as follows:

Tract 1:

BEGINNING at a spike at the intersection of Township Road T-447 and Legislative Route 21034; thence North 38 degrees 54 minutes West 156.41 feet along the center line of L.R. 21034 to a nail in the center line of Legislative Route 21034 at corner of Tract No. 2 herein; thence North 64 degrees 12 minutes 05 seconds East 301.25 feet along Tract No. 2 herein to a stake at corner of lands now or formerly of Hewitt E. Line et ux., and lands now or formerly of Reno Pittenger; thence South 15 degrees 15 minutes East 200 feet along lands now or formerly of Pittenger to a spike in the center line of Township Road T-447; thence South 75 degrees 08 minutes West 233.48 feet along the center line of Township Route T-447 to a stake at the intersection of Township Road T-447 and Legislative Route 21034, the place of **BEGINNING**.

CONTAINING 1.063 acres and being designed Parcel No. 3 on the aforementioned subdivision plan. Having thereon erected a ranch-type dwelling house known as and numbered 699 Barnstable Road.

Tract 2:

BEGINNING at a point in Legislative Route 21034; thence North 38 degrees 54 minutes West 20.00 feet to point in lands now or formerly of Stanley L. Rice, et ux.; thence along lands of same, North 67 degrees 50 minutes 47 seconds East 306.40 feet to a point in corner of lands of same and Tract 1 herein conveyed (referred to as Parcel No. 3 on recorded subdivision); thence along the aforesaid Parcel No. 3, South 64 degrees 12 minutes 05 seconds West 301.25 feet to a point in L.R. 21034, the point and place of **BEGINNING**.

CONTAINING 0.067 acres and being designated as Parcel No. 2 on the aforementioned subdivision plan.

BEING the same two tracts of land which John Suloman, widowed man, by his deed dated October 8, 1997 and recorded in the Office of the Cumberland County Recorder of Deeds of the Commonwealth of Pennsylvania in Book 165, Page 964, granted and conveyed unto Hal K. Berkstresser, Grantor herein.

- b. a 2004 Ford F350 with VIN ending xxxxC85649; and
- c. a 2015 Chevrolet Traverse with VIN ending xxxx241747.

3. If any of the above-described forfeitable property, 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 shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p).

All pursuant to Title 18, United States Code, Section 982(a)(1).

BRUCE D. BRANDLER
Acting United States Attorney

/s Samuel S. Dalke

Samuel S. Dalke
Assistant United States Attorney