

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO**

Criminal Case No.

UNITED STATES OF AMERICA,

Plaintiff,

v.

1. DARLA MURTA SANCHEZ,

Defendant.

**INDICTMENT
18 U.S.C. §§ 157(1) & 2
42 U.S.C. § 408(a)(7)(B)**

The Grand Jury charges:

COUNT 1

1. Beginning on a date unknown to the grand jury, but at least by in or around September 1999, and continuing through in or around August 2004, the defendant, **DARLA MURTA SANCHEZ**, devised, intended to devise, and participated in a scheme to defraud various landlords who rented property to her and her husband.
2. It was a part of the scheme to defraud for **SANCHEZ** to enter leases to rent houses or apartments from various landlords. **SANCHEZ** would then fail to make rental payments as required by these leases.
3. It was a further part of the scheme to defraud for **SANCHEZ**, in response to

threats of eviction from her various landlords, to file bankruptcy petitions in the names of her and her husband, or her husband alone, pursuant to Title 11 of the United States Code, in the United States Bankruptcy Court for the District of Colorado. **SANCHEZ** never took the steps necessary to pursue or to receive bankruptcy discharges on the basis of these petitions. The filing of the petitions, however, triggered an automatic stay in any debt collection actions, including eviction proceedings. **SANCHEZ** then used the period of the bankruptcy stay to avoid paying further rent to her then-current landlord and to find a new rental property to lease.

4. It was a further part of the scheme to defraud for **SANCHEZ** to take steps to prevent successive landlords from discovering her practice of defaulting on rent obligations and then using the bankruptcy process to avoid eviction, including providing false Social Security numbers for herself and her husband and providing false information concerning previous landlords in applications to lease property from those successive landlords. **SANCHEZ** also attempted to move into successive new rental properties before the landlords had sufficient time to verify the information she provided in the rental applications.
5. It was a further part of the scheme to defraud, after **SANCHEZ** and her husband were barred by court order from filing any bankruptcy petitions for 180 days from February 20, 2004, for **SANCHEZ** to file or cause to be filed an additional

bankruptcy petition in the name of her husband which listed an incorrect Social Security number for him in the United States Bankruptcy Court for the District of Colorado.

6. On or about May 30, 2002, the defendant, **DARLA MURTA SANCHEZ**, for the purpose of executing the scheme described above and attempting to do so, filed and caused to be filed a Chapter 7 bankruptcy petition in the names of Kenneth Patrick Sanchez and Darla Murta Sanchez, in the United States Bankruptcy Court for the District of Colorado, case number 02-18104-EEB, a proceeding under Title 11 of the United States Code.

All in violation of Title 18, United States Code, Sections 157(1) and 2.

COUNT 2

7. On or about November 18, 2003, in the State and District of Colorado, for the purpose of obtaining approval of an application to rent a house located at 4871 South Garrison Street, Littleton, Colorado, the defendant, **DARLA MURTA SANCHEZ**, falsely represented that the number 522-02-1947 was the Social Security account number assigned to her by the Commissioner of Social Security, when in fact, such number was not the Social Security account number assigned by the Commissioner of Social Security to her.

All in violation of Title 42, United States Code, Section 408(a)(7)(B).

COUNT 3

8. On or about November 18, 2003, in the State and District of Colorado, for the purpose of obtaining approval of an application to rent a house located at 4871 South Garrison Street, Littleton, Colorado, the defendant, **DARLA MURTA SANCHEZ**, falsely represented that the number 521-21-2789 was the Social Security account number assigned to her husband, Kenneth Sanchez, by the Commissioner of Social Security, when in fact, such number was not the Social Security account number assigned by the Commissioner of Social Security to him.

All in violation of Title 42, United States Code, Section 408(a)(7)(B).

COUNT 4

9. Paragraphs 1-5 above are re-alleged and incorporated here by reference.
10. On or about November 19, 2003, in the State and District of Colorado, the defendant, **DARLA MURTA SANCHEZ**, for the purpose of executing the scheme described in paragraphs 1-5 above and attempting to do so, filed and caused to be filed a Chapter 7 bankruptcy petition in the names of Kenneth P. Sanchez and Darla M. Sanchez, in the United States Bankruptcy Court for the District of Colorado, case number 03-33145-HRT, a proceeding under Title 11 of the United States Code.

All in violation of Title 18, United States Code, Sections 157(1) and 2.

COUNT 5

11. Between on or about May 10, 2004, and May 21, 2004, in the State and District of Colorado, for the purpose of obtaining approval of an application to rent a house located at 4862 South Garland Street, Littleton, Colorado, the defendant, **DARLA MURTA SANCHEZ**, falsely represented that the number 522-04-3629 was the Social Security account number assigned to her by the Commissioner of Social Security, when in fact, such number was not the Social Security account number assigned by the Commissioner of Social Security to her.

All in violation of Title 42, United States Code, Section 408(a)(7)(B).

COUNT 6

12. Between on or about May 10, 2004, and May 21, 2004, in the State and District of Colorado, for the purpose of obtaining approval of an application to rent a house located at 4862 South Garland Street, Littleton, Colorado, the defendant, **DARLA MURTA SANCHEZ**, falsely represented that the number 521-24-8329 was the Social Security account number assigned to her husband, Kenneth Sanchez, by the Commissioner of Social Security, when in fact, such number was not the Social Security account number assigned by the Commissioner of Social Security to him.

All in violation of Title 42, United States Code, Section 408(a)(7)(B).

COUNT 7

13. Paragraphs 1-5 above are re-alleged and incorporated here by reference.

14. On or about June 30, 2004, in the State and District of Colorado, the defendant, **DARLA MURTA SANCHEZ**, for the purpose of executing the scheme described in paragraphs 1-5 above and attempting to do so, filed and caused to be filed a Chapter 7 bankruptcy petition in the name of Kenneth Sanchez, in the United States Bankruptcy Court for the District of Colorado, case number 04-24086-HRT, a proceeding under Title 11 of the United States Code.

All in violation of Title 18, United States Code, Sections 157(1) and 2.

COUNT 8

15. On or about June 30, 2004, in the State and District of Colorado, for the purpose of obtaining an automatic stay of any debt collection actions and in connection with case number 04-24086-HRT in the United States Bankruptcy Court for the District of Colorado, the defendant, **DARLA MURTA SANCHEZ**, falsely represented that the number 522-01-2439 was the Social Security account number assigned to her husband, Kenneth Sanchez, by the Commissioner of Social Security, when in fact, such number was not the Social Security account number assigned by the Commissioner of Social Security to him.

All in violation of Title 42, United States Code, Section 408(a)(7)(B).

A TRUE BILL:

s/ Foreperson
FOREPERSON

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