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Clerk, U.S. District Court, ILCD  
DEC 02 2020

IN THE UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF ILLINOIS  
SPRINGFIELD DIVISION

CLERK OF THE COURT  
U.S. DISTRICT COURT  
CENTRAL DISTRICT OF ILLINOIS

UNITED STATES OF AMERICA,	)	Case No. 20-300 <u>14</u>
	)	VIO: Title 18, United States Code,
Plaintiff,	)	§ 1014.
	)	
v.	)	
	)	
OMAR HERNANDEZ-LOPEZ,	)	
	)	
Defendant.	)	

INDICTMENT

THE GRAND JURY CHARGES:

COUNT 1

**False Bank Account Statement Beginning September 2018 Regarding \$265,010  
Mortgage Loan Application**

On or about December 8, 2018, in the city of Springfield, in the Central District of Illinois and elsewhere,

**OMAR HERNANDEZ-LOPEZ,**

the defendant herein, knowingly made a false statement for the purpose of influencing the action of Loan Depot, a mortgage lending business, in connection with a loan application in the amount of \$265,010 in that the defendant submitted a false PNC bank account statement in the name of his sister, for the period September 7, 2018 through October 3, 2018 that purportedly showed an ending balance in the account of \$61,801.91 when in truth and in fact, as the defendant well knew, the bank account statement was

false and the actual account statement had an ending balance of negative \$234.09 for that same period.

All in violation of Title 18, United States Code, § 1014.

COUNT 2

**False Bank Account Statement Beginning September 2018 Regarding \$265,010  
Mortgage Loan Application**

On or about December 11, 2018, in the city of Springfield, in the Central District of Illinois and elsewhere,

**OMAR HERNANDEZ-LOPEZ,**

the defendant herein, knowingly made a false statement for the purpose of influencing the action of Loan Depot, a mortgage lending business, in connection with a loan application in the amount of \$265,010 in that the defendant submitted a false PNC bank account statement in the name of his sister, for the period October 4, 2018 through November 5, 2018 that purportedly showed an ending balance in the account of \$68,234.60 when in truth and in fact, as the defendant well knew, the bank account statement was false and the actual account statement had an ending balance of \$100.60 for that same period.

All in violation of Title 18, United States Code, § 1014.

**COUNT 3**

**False Bank Account Statement Beginning September 2018 Regarding \$265,010  
Mortgage Loan Application**

On or about January 15, 2019, in the city of Springfield, in the Central District of Illinois and elsewhere,

**OMAR HERNANDEZ-LOPEZ,**

the defendant herein, knowingly made a false statement for the purpose of influencing the action of Loan Depot, a mortgage lending business, in connection with a loan application in the amount of \$265,010 in that the defendant submitted a false PNC bank account statement in the name of his sister, for the period November 4, 2018 through December 5, 2018 that purportedly showed an ending balance in the account of \$68,234.60 when in truth and in fact, as the defendant well knew, the bank account statement was false and the actual account statement had an ending balance of \$210.28 for the period November 6, 2018 through December 5, 2018.

All in violation of Title 18, United States Code, § 1014.

**COUNT 4**

**False Bank Account Statement for September 2018 Regarding \$35,000 La Fiesta Grande Restaurant Loan Application**

On or about December 17, 2018, in the city of Springfield, in the Central District of Illinois and elsewhere,

**OMAR HERNANDEZ-LOPEZ,**

the defendant herein, knowingly made a false statement for the purpose of influencing the action of National Funding, Inc., a mortgage lending business, in connection with a loan application in the amount of \$35,000 in that the defendant submitted a false PNC bank account statement for El Tapatio De Jalisco Inc., a company doing business as La Fiesta Grande, a Mexican restaurant located in Springfield, Illinois, for the period between September 1, 2018 and September 30, 2018 that purportedly showed an ending balance of \$5,716.89 and \$36.00 in overdraft and returned item fees when in truth and in fact, as the defendant well knew, the bank account statement was false and the actual account statement was for the period September 1, 2018 and September 28, 2018 and had an ending balance of negative \$2,443.04 and overdraft and returned item fees in the amount of \$864.

All in violation of Title 18, United States Code, § 1014.

**COUNT 5**

**False Bank Account Statement for October 2018 Regarding \$35,000 La Fiesta Grande Restaurant Loan Application**

On or about December 17, 2018, in the city of Springfield, in the Central District of Illinois and elsewhere,

**OMAR HERNANDEZ-LOPEZ,**

the defendant herein, knowingly made a false statement for the purpose of influencing the action of National Funding, Inc., a mortgage lending business, in connection with a loan application in the amount of \$35,000 in that the defendant submitted a false PNC bank account statement for El Tapatio De Jalisco Inc., a company doing business as La Fiesta Grande, a Mexican restaurant located in Springfield, Illinois, for the period between October 1, 2018 and October 31, 2018 that purportedly showed an ending balance of \$3,135.84 and \$324 in overdraft and returned item fees when in truth and in fact, as the defendant well knew, the bank account statement was false and the actual account statement was for the period September 29, 2018 and October 31, 2018 and had an ending balance of negative \$1,895.65 and overdraft and returned items fees in the amount of \$1,597.00.

All in violation of Title 18, United States Code, § 1014.

COUNT 6

**False Bank Account Statement for November 2018 Regarding \$35,000 La Fiesta Grande Restaurant Loan Application**

On or about December 17, 2018, in the city of Springfield, in the Central District of Illinois and elsewhere,

**OMAR HERNANDEZ-LOPEZ,**

the defendant herein, knowingly made a false statement for the purpose of influencing the action of National Funding, Inc., a mortgage lending business, in connection with a loan application in the amount of \$35,000 in that the defendant submitted a false PNC bank account statement for El Tapatio De Jalisco Inc., a company doing business as La Fiesta Grande, a Mexican restaurant located in Springfield, Illinois, for the period between November 1, 2018 and November 31, 2018 that purportedly showed an ending balance of \$131.90 and \$108 in overdraft and returned items fees when in truth and in fact, as the defendant well knew, the bank account statement was false and the actual account statement was for the period November 1, 2018 and November 30, 2018 and had an ending balance of negative \$72.91 and overdraft and returned item fees in the amount of \$1,798.

All in violation of Title 18, United States Code, § 1014.

COUNT 7

**False Bank Account Statement Beginning May 2019 Regarding \$233,689 Mortgage Loan Application**

On or about June 18, 2019, in the city of Springfield, in the Central District of Illinois and elsewhere,

**OMAR HERNANDEZ-LOPEZ,**

the defendant herein, knowingly made a false statement for the purpose of influencing the action of Loan Depot, a mortgage lending business, in connection with a loan application in the amount of \$233,689 in that the defendant submitted a false PNC bank account statement in the name of his brother, for the period May 7, 2019 to June 6, 2019 that purportedly showed an ending balance in the account of \$50,386.52 when in truth and in fact, as the defendant well knew, the bank account statement was false and the account actually belonged to the defendant and contained an ending balance of negative \$386.52.

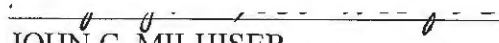
All in violation of Title 18, United States Code, § 1014.

A TRUE BILL,

s/Foreperson

  
FOREPERSON

s/Gregory Gilmore

  
JOHN C. MILHISER  
UNITED STATES ATTORNEY  
GKH