

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF INDIANA  
INDIANAPOLIS DIVISION

**FILED**  
**4:03 pm, Dec 11, 2023**  
U.S. DISTRICT COURT  
SOUTHERN DISTRICT OF INDIANA  
Roger A.G. Sharpe, Clerk

UNITED STATES OF AMERICA, )  
)  
Plaintiff, )  
)  
V. )  
)  
JOSE A. PRADO-VALERO, )  
)  
Defendant. )  
)

CAUSE NO. 1:23-cr-189-TWP-MG

**INFORMATION**

The United States Attorney charges that:

**COUNT 1**  
**18 U.S.C. §§ 1344 and 2**  
**Financial Institution Fraud**

**GENERAL ALLEGATIONS**

At times material to this Information:

1. Financial Center First Credit Union (“FCFCU”) was a financial institution as defined by federal law and conducted business in Marion County, Indiana, in the Southern District of Indiana.

2. **JOSE A. PRADO-VALERO (PRADO-VALERO)**, the Defendant herein, was employed by FCFCU as an Automated Clearing House (ACH) Coordinator. His duties included posting and coordinating ACH transactions into and out of FCFCU members’ accounts.

3. In his role, **PRADO-VALERO** had access to members’ personal identifiable information, including Social Security number, date of birth, home address, telephone number and

their FCFCU account number. **PRADO-VALERO** further had access to members' recent transaction history and could view the account balance.

#### **THE SCHEME**

4. On a date unknown, but prior to February 14, 2019, **PRADO-VALERO** was approached by individuals not employed by FCFCU who sought to unlawfully obtain money and funds held by FCFCU in member accounts by compromising **PRADO-VALERO** in the performance of his duties at FCFCU.

5. **PRADO-VALERO** was advised that he would be paid by these persons for providing them with unauthorized personal identifiable information and account information of FCFCU members, so that they could access these member accounts and unlawfully transfer money to themselves by way of ACH transfers. **PRADO-VALERO** knowingly agreed to do this.

6. Based upon this agreement, **PRADO-VALERO** provided such information to his accomplices on numerous occasions in 2019, and the accomplices were able to successfully complete approximately 34 fraudulent ACH transfers out of FCFCU member accounts in the aggregate amount of approximately \$2,078,725. These transfers were done without the knowledge, consent, or authorization of the FCFCU members. **PRADO-VALERO** was paid in excess of \$100,000 by his accomplices for his role in execution of this scheme.

**EXECUTION OF THE SCHEME**

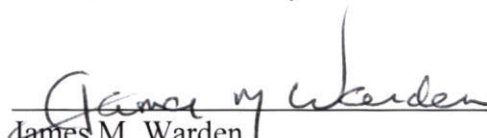
7. On various occasions beginning at least as early as on or about February 14, 2019, and continuing until on or about August 16, 2019, in Marion County, Indiana, in the Southern District of Indiana,


**JOSE A. PRADO-VALERO,**

Defendant herein, did knowingly execute and attempt to execute a scheme to defraud a financial institution, and to obtain moneys, funds and credits under the custody and control of said financial institution, by means of false and fraudulent pretenses, representations, and promises, as more fully set forth in Paragraphs 1 through 6 above, and aided and abetted others in so doing.

All in violation of Title 18, United States Code, Sections 1344 and 2.

ZACHARY A. MYERS  
United States Attorney

  
James M. Warden  
Assistant United States Attorney  
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Kyle M. Sawa  
Chief, General Crimes Unit