

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA            )  
  )  
  )     Criminal No.            06-86  
  )     (18 U.S.C. § 1344)  
v.                                        )  
ROY E. SMITH                            )

INFORMATION

The United States Attorney charges:

At all times material to this Information:

1. Citizen's Bank, First Commonwealth Bank, Dollar Bank, Commercial Bank & Trust, and S & T Bank (hereinafter "the financial institutions") were financial institutions, the deposits of which were insured by the Federal Deposit Insurance Corporation.

2. The defendant, ROY E. SMITH, operated a religious organization which he established, at times known as the Bread of Life Church of Dominion, located in McKeesport, Pennsylvania, and at times known as the Church of Dominion, located in McKeesport, Pennsylvania, and later in Greensburg, Pennsylvania.

3. From on or about September 29, 2004, and continuing thereafter to on or about September 7, 2005, in the Western District of Pennsylvania, the defendant, ROY E. SMITH, knowingly executed, and attempted to execute, a scheme and artifice to defraud and to obtain money, funds and property owned by and under the custody and control of the financial institutions, by means of false and fraudulent pretenses, representations and promises, well knowing at the time that the pretenses, representations and promises were false and fraudulent when made.

4. It was a part of the scheme and artifice to defraud that the defendant, ROY E. SMITH, falsely represented the Church of Dominion's financial condition in loan applications presented to the financial institutions in an effort to induce the financial institutions to grant secured and unsecured loans to the Church of Dominion. The false representations of the Church of Dominion's financial condition included:

a) financial statements which were falsely represented as audited by independent accountants, and which falsely represented the Church of Dominion's income;

b) a rent payment history letter for the Church of Dominion which falsely represented the name of the landlord, the amount of monthly rent, and the rent payment history of the Church of Dominion at its leased location in McKeesport, Pennsylvania;

c) a false award notification letter to the Church of Dominion, represented to be from The Richland Foundation in Harrisburg, Pennsylvania, which purported to grant to the Church of Dominion the amount of \$150,000; and,

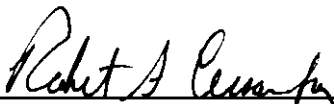
d) false representations about the indebtedness of the Church of Dominion.

5. It was further a part of the scheme and artifice to defraud that the defendant, ROY E. SMITH, provided the same loan collateral to more than one of the financial institutions without notifying the involved financial institutions that the collateral had been previously pledged.

6. On or about the dates noted below, in the Western District of Pennsylvania, the defendant, ROY E. SMITH, executed the scheme and artifice to defraud by causing the following secured and unsecured loans to be granted to the Church of Dominion by the financial institutions indicated, in the amounts noted:

FINANCIAL INSTITUTION	ON OR ABOUT DATE	AMOUNT
Commercial Bank & Trust	Jan. 25, 2005	\$ 20,000
First Commonwealth Bank	Feb. 4, 2005	\$150,000
Citizen's Bank	Feb. 4, 2005	\$364,000
Dollar Bank	April 19, 2005	\$150,000
S & T Bank	April 29, 2005	\$ 40,000
Commercial Bank & Trust	May 24, 2005	\$ 15,000
S & T Bank	July 20, 2005	\$ 60,000
Commercial Bank & Trust	September 7, 2005	\$ 25,000

In violation of Title 18, United States Code, Section 1344.

  
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 MARY BETH BUCHANAN  
 United States Attorney  
 PA ID No. 50254