

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA) No.
)
) Violations: Title 18, United States Code,
) Section 1343; Title 26, United States Code,
NANCY DOBROWSKI) Section 7206

COUNT ONE

The UNITED STATES ATTORNEY charges:

1. At times material to this information:

a. The Village of Burnham was a unit of local government and a political subdivision of the State of Illinois.

b. NANCY DOBROWSKI was the elected Clerk of the Village of Burnham and maintained her office at the Burnham Village Hall, located at 14450 Manistee Avenue, Burnham, Illinois.

c. DOBROWSKI, and employees under her control, regularly collected cash and checks as payment for various Village fees, including fees charged for court appearances, water and sewer services, vehicle stickers, business licenses, building permits, liquor licenses, and vending licenses. The Village also collected fines for violations of Village ordinances and bonds paid by individuals whose vehicles were towed by the Village (“tow bonds”), which individuals had to pay to retrieve their towed vehicles. The cash and checks the Village received for these fees, fines, and tow bonds were kept in the Clerk’s office and were intended to be deposited into one of the Village’s bank accounts.

d. As Clerk, DOBROWSKI had access to the cash and checks the Village

collected and kept in the Clerk's office at Village Hall. DOBROWSKI's responsibilities included managing the Village's finances and depositing cash and checks into the Village's bank accounts. As Clerk, DOBROWSKI was an authorized signatory on each of the Village's bank accounts.

2. Beginning no later than 2004, and continuing until on or about May 29, 2013, at Burnham, in the Northern District of Illinois, Eastern Division, and elsewhere,

NANCY DOBROWSKI,

defendant herein, devised, intended to devise, and participated in a scheme to defraud the Village of Burnham and to obtain money, funds, and property owned by and under the custody and control of the Village of Burnham, by means of materially false and fraudulent pretenses and representations, and the concealment of material facts, which scheme is further described as follows:

3. It was part of the scheme that DOBROWSKI took cash the Village received as payment for fees and fines from the public. DOBROWSKI then used most of the cash to gamble at casinos in Indiana, and occasionally elsewhere, either by taking cash to casinos or by depositing the money into her personal bank account and then withdrawing it from automated teller machines at casinos. DOBROWSKI falsely represented the Village's finances to auditors and covered up her scheme by causing false entries in Village books.

4. It was further part of the scheme that DOBROWSKI took cash from both the Village cash register and the collection of money received as tow bonds and misappropriated those funds for her personal use.

5. It was further part of the scheme that DOBROWSKI concealed her misappropriation of Village funds by recording false amounts of tow bond money that had been

received in order to make it appear that the Village had received a lower amount of tow bond cash than it had actually received. DOBROWSKI also sometimes placed a portion of the tow bond money, which was not ordinarily kept in the cash register, into the cash register to make the cash register appear balanced, thereby concealing her theft of cash from the register.

6. It was further part of the scheme that DOBROWSKI concealed her misappropriation of cash from the Village cash register by waiting until the week after she took cash from the register to deposit cash into the Village's bank accounts instead of making a daily deposit. By delaying a deposit, DOBROWSKI could use funds received by the Village in the week after she took cash from the register to make up for the funds she had taken during the prior week, thereby making the deposit appear to match the revenues despite the cash she had taken.

7. It was further part of the scheme that DOBROWSKI concealed her misappropriation of cash from the Village cash register by failing to record checks received from the public as payment for Village fees and services. DOBROWSKI would place the unrecorded checks in the cash register to compensate for an equal amount of cash that she had misappropriated, thereby making it appear that the cash register balanced.

8. It was further part of the scheme that DOBROWSKI concealed her misappropriation of cash from the Village cash register by providing false information to the Village's outside audit firm regarding the Village's revenues and by regularly disposing of the cash register tape, thereby concealing the fact that the Village revenue often did not match the amount of the deposits into Village bank accounts.

9. It was further part of the scheme that DOBROWSKI did misrepresent, conceal, and hide, and cause to be misrepresented, concealed, and hidden the true purposes of the acts

done in furtherance of the scheme.

10. As a result of the scheme, the Village of Burnham was defrauded of a total of at least \$650,862 in cash stolen from the Clerk's office at Village Hall.

11. On or about December 12, 2012, at Burnham, in the Northern District of Illinois, Eastern Division, and elsewhere,

NANCY DOBROWSKI,

defendant herein, for the purpose of executing the above-described scheme, did knowingly cause to be transmitted by means of wire communication in interstate commerce, certain writings, signs, and signals, namely, an electronic mail message sent by the Village of Burnham's outside audit firm to the Village of Burnham, through Comcast's Emeryville, California servers, which message included as an attachment the Village of Burnham 2011 audited financial statements, which DOBROWSKI knew contained false information that she had provided regarding the Village's revenues;

In violation of Title 18, United States Code, Section 1343.

COUNT TWO

The UNITED STATES ATTORNEY further charges:

On or about April 15, 2013, in the Northern District of Illinois, Eastern Division,

NANCY DOBROWSKI,

defendant herein, willfully made, subscribed, and caused to be made and subscribed, a United States Individual Income Tax Return (Form 1040 with schedules and attachments), for the calendar year 2012, which return was verified by written declaration that it was made under the penalties of perjury and was filed with the Internal Revenue Service, which income tax return she did not believe to be true and correct as to every material matter, in that it stated on Line 22 that her total income was \$309,181, whereas, in truth and fact, as DOBROWSKI knew, her total income was substantially in excess of that amount, in that the defendant failed to report additional income received in calendar year 2012, including income received from her misappropriation of cash from the Village of Burnham;

In violation of Title 26, United States Code, Section 7206(1).

UNITED STATES ATTORNEY