

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	CRIMINAL NO. <u>13-</u>
v.	:	DATE FILED: <u>October 21, 2013</u>
CHRISTOPHER STEHM	:	VIOLATIONS:
	:	18 U.S.C. § 1343 (wire fraud – 2 counts)
	:	26 U.S.C. § 7601(6) (filing a false tax return – 2 counts)
	:	Notice of Forfeiture

INFORMATION

COUNTS ONE AND TWO

THE UNITED STATES ATTORNEY CHARGES THAT:

BACKGROUND

At all times material to this information:

1. Ametek, Inc. (“Ametek”) was a Delaware corporation, which had its principal place of business in Berwyn, in the Eastern District of Pennsylvania. Ametek made electronic instruments for companies in the aerospace, defense, mass transit, and office products industries. Ametek had offices located in multiple states and countries, including what it referred to as its “Chandler” division in Broken Arrow, Oklahoma, and its “HCC” division in Cincinnati, Ohio.

2. Ametek had established company-wide policies and procedures regarding the reimbursement of employee expenses for travel, entertainment, and other business-related expenses. Employees who sought such expense reimbursements were required to either submit claims electronically or to sign and transmit written claims forms and provide documentary

support, such as receipts, for most claims: i.e., those above a threshold level that increased from \$25 to \$75 over time.

3. Among the reimbursable expenses were some costs associated with relocating to take a job at one of Ametek's various divisions, although Ametek policy limited these reimbursable relocation expenses to: one house-hunting visit, travel in advance of a move, travel to the new location for the new employee and his family, moving expenses, storage for up to three months, and carrying charges (mortgage interest, taxes, and utilities) on the old location for three months.

4. From approximately January 2, 2006 through March 2010, defendant CHRISTOPHER STEHM worked for Ametek as the controller of the company's Chandler division. In or about April 2010, Ametek promoted defendant STEHM to be the Vice President of Finance in the HCC division. In both positions, defendant STEHM was his office's chief accounting officer, and his job responsibilities included overseeing the submission of claims by Ametek employees for reimbursement of business expenses; making sure that the expense reimbursement claims fully complied with Ametek's policy; and training Ametek employees on the proper review procedures for expense reports.

THE SCHEME

5. From at least January 2006 until on or about November 20, 2012, defendant

CHRISTOPHER STEHM

devised and intended to devise a scheme to defraud Ametek and to obtain money and property by means of false and fraudulent pretenses, representations, and promises.

MANNER AND MEANS

It was part of the scheme that:

6. Defendant CHRISTOPHER STEHM repeatedly submitted expense reimbursement claims to Ametek on which he sought reimbursement for expenses that he knew he had never incurred, including purchases of hotel stays, airplane tickets, and other travel-related expenses, as well as continuing professional education courses.

7. Defendant CHRISTOPHER STEHM also repeatedly sought reimbursement for expenses that he knew were purely personal and, therefore, not subject to reimbursement by Ametek, such as repairs to his personal automobiles, non-business meals, electronic equipment for his home, and even the purchase of a family dog.

8. Defendant CHRISTOPHER STEHM personally filled out and signed most, if not all, of the fraudulent expense reimbursement vouchers he submitted to Ametek.

9. Defendant CHRISTOPHER STEHM supported many of his fraudulent expense reimbursement claims by providing Ametek with what defendant STEHM claimed were receipts for those expenses when, as defendant STEHM knew, the receipts were for purchases unrelated to those expenses.

10. In some cases, defendant CHRISTOPHER STEHM physically altered the receipts he submitted in support of his expense claim reimbursements, either by cutting off the tops of the receipts in order to hide the names of the vendors, or by “whiting out” portions of the receipt that would specify the transaction for which the charge had been incurred. For example, when seeking reimbursement for expenses he incurred to repair or improve a personal vehicle, defendant STEHM submitted receipts to Ametek that he had altered by removing all references on the receipt to the make and model of the car that had been serviced.

11. In other instances, defendant CHRISTOPHER STEHM used one legitimate receipt – or a similar document like an invoice or a copy of an airplane ticket – to support multiple expense reimbursement claims that defendant STEHM submitted to Ametek at different times. For example, there were multiple occasions when defendant STEHM traveled to or within Europe for Ametek and used the same travel receipts to support different expense reimbursement claims that he submitted in successive weeks.

12. Defendant CHRISTOPHER STEHM also knowingly and intentionally used an Ametek corporate credit card to make personal expenditures and then falsely claimed the expenditures were business-related and supported such false claims with altered or forged receipts.

13. Defendant CHRISTOPHER STEHM also repeatedly sought reimbursement from Ametek for relocation expenses that defendant STEHM knew either were not reimbursable under Ametek's established policies and/or were not actually related to STEHM's move from the Chandler division in Oklahoma to the HCC division in Ohio.

14. Ametek relied on the false representations that defendant CHRISTOPHER STEHM made in connection with his expense reimbursement claims and paid nearly all of the claims that defendant STEHM submitted.

15. In total, defendant CHRISTOPHER STEHM defrauded Ametek out of at least \$659,731 through his fraudulent expense reimbursement claim scheme between about January 2, 2006, which was his start date at Ametek, and about November 20, 2012, when Ametek terminated his employment.

16. On or about each of the dates set forth below, defendant

CHRISTOPHER STEHM,

for the purpose of executing the scheme described above, knowingly caused to be transmitted by means of wire communication in interstate commerce, to Berwyn, in the Eastern District of Pennsylvania, the signals and sounds described below for each count, each transmission constituting a separate count:

COUNT	DATE	DESCRIPTION
1	May 1, 2012	A wire transmittal from Ohio to Pennsylvania, via a California-based computer server, of an expense reimbursement claims form, filled out and signed by Stehm, containing fraudulent representations, including a representation that on January 16, 2012, Stehm had spent approximately \$831 on continuing professional education, when in reality, Stehm had purchased a dog at a pet store and then altered the receipt to make it appear like he had purchased a book on corporate mergers and acquisitions.
2	October 9, 2012	A wire transmittal from Ohio to Pennsylvania, via a California-based computer server, of an expense reimbursement claims form, filled out and signed by Stehm, containing fraudulent representations, including a representation that on August 25, 2012, Stehm had spent approximately \$123.03 on repairs for a company car, when in reality, Stehm had paid for expenses to a Lotus he owned personally and then altered the receipt.

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

COUNT THREE

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

1. Paragraphs 1 through 4 and 6 through 14 of Counts One and Two of this information are re-alleged here.

2. On or about April 15, 2011, in the Western District of Missouri and elsewhere, defendant

CHRISTOPHER STEHM

willfully made and subscribed a United States income tax return, Form 1040, for the calendar year 2010, which was verified by a written declaration that it was made under the penalty of perjury and filed with the Director, Internal Revenue Service Center, at Kansas City, Missouri, which defendant STEHM did not believe to be true and correct as to every material matter, in that the return reported that defendant STEHM had a total of \$91,389 in taxable income for 2010, when, as defendant STEHM knew, his actual taxable income for 2010 was approximately \$193,222.

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

COUNT FOUR

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

1. Paragraphs 1 through 4 and 6 through 14 of Counts One and Two of this information are re-alleged here.
2. On or about April 15, 2012, in the Eastern District of California and elsewhere, defendant

CHRISTOPHER STEHM

willfully made and subscribed a United States income tax return, Form 1040, for the calendar year 2011, which was verified by a written declaration that it was made under the penalty of perjury and filed with the Director, Internal Revenue Service Center, at Fresno, California, which defendant STEHM did not believe to be true and correct as to every material matter, in that the return reported that defendant STEHM had a total of \$94,913 in taxable income for 2011, when, as defendant STEHM knew, his actual taxable income for 2011 was approximately \$235,673.

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

NOTICE OF FORFEITURE

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

1. As a result of the violations of Title 18, United States Code, Section 1343 described in this information, defendant

CHRISTOPHER STEHM

shall forfeit to the United States of America, any property, real or personal, which constitutes or is derived from proceeds traceable to violations, including, but not limited to any financial interest in the following:

- (a) the sum of \$659,371;
- (b) real property located 3269 Riverside Dr., Mason, OH 45040;
- (c) real property located at 1711 W. 120th Ct. S, Jenks, OK 74037;
- (d) vehicles, including but not limited to: (i) a 2010 New Beetle Hatchback with a vehicle identification number ending in 8073; (ii) a 1991 Porsche 928 Coupe with a vehicle identification number ending in 0188; (iii) a 1992 Porsche 968 coupe with a vehicle identification number ending in 0456; (iv) a 1987 Buick Grand National with a vehicle identification number ending in 1686; and (v) a 2010 Volkswagen Golf with a vehicle identification number ending in 1483.

2. If any of the property subject to forfeiture, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;

- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 28, United States Code, Section 2461(c), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property subject to forfeiture.

All pursuant to Title 18, United States Code, Section 981(a)(1)(c) and Title 28, United States Code, Section 2461(c).

ZANE DAVID MEMEGER
United States Attorney