

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

UNITED STATES OF AMERICA            )  
  )    No.  
  )    )  
  )    Violation: Title 18, United States Code,  
DORA ASMUSSEN                        )    Section 1344

**COUNT ONE**

The SPECIAL JANUARY 2012 GRAND JURY charges:

1.       At times material to this indictment:

a.       Defendant DORA ASMUSSEN was employed at Burling Bank, in Chicago, Illinois, where she held various positions, including Chief Operating Officer and Executive Vice President. As part of her duties, defendant was in charge of the bank's day-to-day retail banking transactions and was responsible for certain accounting and record keeping activities.

b.       Burling Bank was a financial institution whose deposits were insured by the Federal Deposit Insurance Corporation.

c.       The Federal Deposit Insurance Corporation, state regulators, and Burling Bank's auditors conducted exams or internal audits of Burling Bank at various times.

d.       Burling Bank's Board of Directors had monthly meetings, which included discussions of the bank's financial condition. Defendant ordinarily attended those meetings and reported information concerning the bank's finances, without disclosing that any funds were missing.

2. Beginning in or about early 1997 and continuing through in or about August 2012, at Chicago, in the Northern District of Illinois, Eastern District, and elsewhere,

DORA ASMUSSEN,

defendant herein, knowingly participated in a scheme to defraud, and to obtain money, funds, and other property owned by and under the custody and control of Burling Bank, a financial institution, by means of materially false and fraudulent pretenses, representations, and promises, as further described below.

3. It was part of the scheme that defendant DORA ASMUSSEN stole funds from Burling Bank by fraudulently issuing personal checks and cashier's checks, as well as misappropriating customers' checks, and then used funds belonging to Burling Bank to cover the payment of those checks. Defendant made false entries in Burling Bank's internal records in order to steal the funds and to conceal the thefts. Defendant stole approximately \$3,074,532 from Burling Bank.

4. It was further part of the scheme that defendant DORA ASMUSSEN wrote personal checks, drawn on her personal account at Burling Bank, and then prevented those checks from clearing and being debited from her account by physically removing those checks when they were delivered to Burling Bank by the Federal Reserve. Defendant made false entries in Burling Bank's internal records, thereby causing payments to be made from Burling Bank's funds to the payees listed on the personal checks.

5. It was further part of the scheme that defendant DORA ASMUSSEN

fraudulently caused Burling Bank to issue cashier's checks made payable to her or her creditors. In order to cover the cost of those cashier's checks, defendant debited the bank's general ledger account, and credited the account from which the cashier's checks were drawn. In some instances, defendant forged the signature of the bank employee purportedly issuing the cashier's check. Defendant deposited certain cashier's checks into her bank accounts, and used other cashier's checks to pay her creditors.

6. It was further part of the scheme that defendant DORA ASMUSSEN misappropriated certain checks that customers deposited at Burling Bank. Defendant manually entered credits to the customers' accounts, in the amount of the checks that the customers had deposited, and then debited the bank's general ledger account in corresponding amounts to cover those checks. Defendant then deposited the customers' checks into her own bank accounts, usually through ATMs.

7. It was further part of the scheme that defendant DORA ASMUSSEN provided bank records containing false information to the FDIC, state regulators, Burling Bank's Board of Directors, and the bank's auditors, in order to conceal her fraud.

8. It was further part of the scheme that defendant DORA ASMUSSEN used the stolen funds for her own personal benefit, primarily for gambling.

9. As a result of this scheme to defraud, defendant DORA ASMUSSEN fraudulently obtained approximately \$3,074,532.

10. It was further part of the scheme that defendant DORA ASMUSSEN misrepresented, concealed, and hid, and caused to be misrepresented, concealed and hidden,

the nature and purposes of the acts done in furtherance of the scheme.

11. On or about February 3, 2009, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

DORA ASMUSSEN,

defendant herein, knowingly executed and attempted to execute the scheme to defraud Burling Bank, by fraudulently causing Burling Bank to issue a cashier's check, dated February 3, 2009, made payable to the defendant, in the amount of approximately \$96,452, and by making false entries in Burling Bank's internal records to cover the payment of that cashier's check, namely, debiting the bank's general ledger account, and crediting the account from which the cashier's check was drawn;

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

**COUNT TWO**

The SPECIAL JANUARY 2012 GRAND JURY further charges:

1. Paragraphs 1 through 10 of Count One of this indictment are incorporated here.
2. On or about May 21, 2009, at Chicago, in the Northern District of Illinois,

Eastern Division, and elsewhere,

DORA ASMUSSEN,

defendant herein, knowingly executed and attempted to execute the scheme to defraud Burling Bank, by fraudulently causing Burling Bank to issue a cashier's check, dated May 21, 2009, made payable to the defendant, in the amount of approximately \$64,985, and by making false entries in Burling Bank's internal records in order to cover the payment of that cashier's check, namely, debiting the bank's general ledger account, and crediting the account from which the cashier's check was drawn;

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

**COUNT THREE**

The SPECIAL JANUARY 2012 GRAND JURY further charges:

1. Paragraphs 1 through 10 of Count One of this indictment are incorporated here.
2. On or about May 29, 2012, at Chicago, in the Northern District of Illinois,

Eastern Division, and elsewhere,

DORA ASMUSSEN,

defendant herein, knowingly executed and attempted to execute the scheme to defraud Burling Bank, in that she fraudulently misappropriated two checks, dated May 29, 2012, totaling approximately \$27,904, which had been deposited by a customer, and she made false entries in Burling Bank's internal records to cover the payment of those checks, namely, debiting the bank's general ledger account, and crediting the customer's account;

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

## FORFEITURE ALLEGATION

The SPECIAL JANUARY 2012 GRAND JURY further charges:

1. The allegations of Counts One through Three of this indictment are incorporated here for the purpose of alleging forfeiture to the United States pursuant to Title 18, United States Code, Section 982.

2. As a result of her violations of Title 18, United States Code, Section 1344, as alleged in the foregoing indictment,

DORA ASMUSSEN,

defendant herein, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(2), any and all right, title, and interest she may have in any property, real and personal, constituting, and derived from, proceeds obtained directly and indirectly, as the result of violations of Title 18, United States Code, Section 1344, which property is subject to forfeiture pursuant to Title 18, United States Code, Section 982.

3. The interests of defendant subject to forfeiture pursuant to Title 18, United States Code, Section 982, include, but are not limited to, funds in the amount of \$3,074,532, and any property constituting, derived from, and traceable to, the proceeds that defendant obtained directly or indirectly as a result of the offense.

4. Specifically, but not exclusively, subject to forfeiture pursuant to Title 18, United States Code, Section 982(a)(2), are the funds described as \$3,074,532 that defendant obtained and caused to be obtained from at least in or about early 1997 until at least in or about August 2012, insofar as such funds constitute, and are derived from bank fraud in

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

5. If any of the forfeitable property described above, as a result of any act or omission by 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,

the United States of America shall be entitled to forfeiture of substitute property under the provisions of Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1).

All pursuant to Title 18, United States Code, Section 982.

A TRUE BILL:

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FOREPERSON

\_\_\_\_\_  
ACTING UNITED STATES ATTORNEY