UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF INDIANA INDIANAPOLIS DIVISION

FILED

AUG 09 2019

UNITED STATES OF AMERICA, Plaintiff, V. ANNIE FIELDS, Defendant.

INFORMATION

The United States Attorney charges that:

INTRODUCTION

At times material to this Information:

1. M&M, Inc. (M&M) was an Indiana corporation doing business as an automotive services business in Boone County, Indiana, in the Southern District of Indiana.

2. **ANNIE FIELDS**, the Defendant herein, was employed by M&M. Her duties included bookkeeping and clerical responsibilities.

3. M&M maintained a bank account and a Mastercard credit card account at Fifth Third Bank, a financial institution as defined by federal law.

THE SCHEME TO DEFRAUD

4. On various occasions between September 2012 and December 2014, ANNIE FIELDS wrote unauthorized checks drawn on the M&M bank account payable to herself or for the benefit of herself and converted the proceeds of said checks to herself.

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5. In order to hide her creation of these unauthorized checks from M&M officials, **ANNIE FIELDS** created false copies of the checks, which included a different payee, thereby indicating that the payee in each case was authorized. She then provided the false copies to M&M officials.

6. On various occasions between October 2012 and July 2014, **ANNIE FIELDS** made unauthorized transactions for her personal benefit with the M&M Mastercard credit card.

7. In order to hide her unauthorized credit card transactions from M&M officials, **ANNIE FIELDS**, created false credit card statements omitting her unauthorized transactions and provided the same to M&M officials.

EXECUTION OF THE SCHEME TO DEFRAUD

8. On various occasions beginning not later than on or about the 21st day of September 2012, and continuing until at least on or about the 11th day of December 2014, in Boone County, in the Southern District of Indiana,

ANNIE FIELDS,

Defendant herein, having devised a scheme or artifice to defraud and for obtaining money by means of false or fraudulent pretenses, representations, or promises, as described in Paragraphs 1 through 7 above, did, for the purpose of executing such scheme or artifice, knowingly cause various wire communications of writings or signals to be transmitted in interstate commerce; in violation of Title 18, United States Code, Section 1343.

United States Attorney

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STATE OF INDIANA)) SS: COUNTY OF MARION)

James M. Warden, being first duly sworn, upon his oath deposes and says that he is an Assistant United States Attorney in and for the Southern District of Indiana, that he makes this affidavit for and on behalf of the United States of America, and that the allegations in the foregoing Information are true as he is informed and verily believes.

Assistant United States Attorney

Subscribed and sworn to before me, a notary public, on this $\underline{9^{\text{H}}}$ day of \underline{AUQUSL} , 2019.



Jessica Erin Retzlaff Notary Public

My Commission Expires: May 10,

My County of Residence: Vigo