

FILED

FEB 06 2017

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF ILLINOIS  
CLERK, U.S. DISTRICT COURT  
SOUTHERN DISTRICT OF ILLINOIS  
EAST ST. LOUIS OFFICE

UNITED STATES OF AMERICA, )  
)  
Plaintiff, )  
vs. )  
)  
DANIELLE D. CLARK, )  
)  
a/k/a Danielle D. Markiewicz, )  
a/k/a Danielle D. Cantrall, )  
Defendant. )

Case No. 3:17-CR-30010-SMY  
Title 18, United States Code,  
Sections 152(3), 1343

INFORMATION

**THE UNITED STATES ATTORNEY JURY CHARGES:**

INTRODUCTION TO THE SCHEME TO DEFRAUD AND EMBEZZLEMENT FROM THE EDEN VILLAGE CARE CENTER

At all relevant times:

1. **DANIELLE D. CLARK** was the Director of Human Resources and the Accounts Payable Clerk for the Eden Village Care Center.
2. As the Director of Human Resources and the Accounts Payable Clerk, she was in a position of trust to act for the benefit of the Eden Village Care Center and to not act for undisclosed personal financial interests.
3. The Eden Village Care Center is a not for profit corporation and a retirement community in Glen Carbon, Illinois, in Madison County, Illinois, which is within the Southern District of Illinois.
4. A scheme to defraud is a scheme that is intended to deceive or cheat another and to obtain money or property or cause the loss of money or property to another.

5. From in or around 2011, and continuing through in or around May of 2016, in Madison County, within the Southern District of Illinois, and elsewhere,

**DANIELLE D. CLARK,**

defendant, did devise a scheme to defraud the Eden Village Care Center by making unauthorized credit transactions in using an Eden Village Care Center credit card issued through the Bank of Edwardsville and a Sams Club/Walmart credit card, causing a loss to Eden Village Care Center in excess of \$700,000. The credit transactions were electronic wire transmissions through and involving interstate commerce.

6. As part of the scheme and in furtherance of it, **DANIELLE D. CLARK** prepared fake credit card statements to cover up and continue her embezzlement.

7. As part of the scheme and in furtherance of it, **DANIELLE D. CLARK** forged signatory names on Eden Village Care Center checks to pay for the unauthorized charges using Eden Village Care Center funds.

8. As part of the scheme and in furtherance of it, **DANIELLE D. CLARK** manipulated the accounting books and created fake invoices for Eden Village Care Center to hide the expenses for the credit card transactions.

**COUNT 1**

**FORESEEABLE INTERSTATE WIRE COMMUNICATION IN FURTHERANCE OF SCHEME TO DEFRAUD THE EDEN VILLAGE CARE CENTER, -APRIL 5, 2016**

1. The allegations set forth in paragraphs one through eight are incorporated by reference.

2. On or about April 5, 2016, in Madison County within the Southern District of Illinois, and elsewhere,

**DANIELLE D. CLARK,**

the defendant, for purposes of executing, and attempting to execute the above-described scheme and artifice to defraud and deprive, knowingly caused to be transmitted a wire communication in interstate commerce which was foreseeable in the ordinary course of business, a credit card transaction at Sam's Club in Glen Carbon, Illinois using an Eden Village Care Center credit card to purchase gift cards for personal use.

All in violation of Title 18, United States Code, Section 1343.

**COUNT 2**

**FORESEEABLE INTERSTATE WIRE COMMUNICATION IN FURTHERANCE OF SCHEME TO DEFRAUD THE EDEN VILLAGE CARE CENTER, -APRIL 4, 2016**

1. The allegations set forth in paragraphs one through eight are incorporated by reference.

2. On or about April 4, 2016, in Madison County within the Southern District of Illinois, and elsewhere,

**DANIELLE D. CLARK,**

the defendant, for purposes of executing, and attempting to execute the above-described scheme and artifice to defraud and deprive, knowingly caused to be transmitted a wire communication in interstate commerce which was foreseeable in the ordinary course of business, a credit card transaction at CVS Pharmacy in Edwardsville, Illinois using an Eden Village Care Center credit card to purchase gift cards for personal use.

All in violation of Title 18, United States Code, Section 1343.

**COUNT 3**


**FALSE BANKRUPTCY DECLARATION: SOUTHERN DISTRICT OF ILLINOIS CASE 12-31240-LKG**


1. The allegations set forth in paragraphs one through eight are incorporated by reference.
2. On or about June 29, 2012, in St. Clair County, within the Southern District of Illinois,

**DANIELLE D. CLARK a/k/a DANIELLE D. CANTRALL**

the defendant herein knowingly and fraudulently made a material false declaration, certificate and verification under the penalty of perjury, as permitted under Section 1746 of Title 28, in and in relation to a case under Title 11, In re Danielle D. Cantrall, Case No. 12-31240-LKG, by submitting Schedules of Assets and Liabilities and a Statement of Financial Affairs, in which the defendant fraudulently omitted to disclose the money that she embezzled from the Eden Village Care Center as income.

All in violation of Title 18, United States Code, Section 152(3).

  
DONALD BOYCE  
United States Attorney  
Southern District of Illinois

  
NORMAN R. SMITH  
Assistant United States Attorney

Recommended bond: \$25,000 unsecured.