



4. CitiBusiness is registered trademark that belongs to Citi (formerly Citigroup Inc.), which is a national bank that offers banking services, credit cards and other services for businesses. Citi is headquartered in New York City, New York, and payments for charges made on CitiBusiness Cards can be made online or sent by mail to CitiBusiness Cards in Columbus, Ohio.

5. PNC Financial Services Group, Inc. ("PNC") is a bank with regional banking services available in nineteen states and the District of Columbia. PNC is headquartered in Pittsburgh, Pennsylvania, and offers a business enterprise checking service.

6. Chase is a national bank and subsidiary of JPMorgan Chase Bank, N.A., and is headquartered in Chicago, Illinois. Chase offers business and personal banking services, credit cards and other services.

#### **THE SCHEME**

7. From on or about September 5, 2006 to on or about December 26, 2010, in the Eastern District of Pennsylvania, and elsewhere, defendant

**FELICIA ANNE STRAUB,**  
a/k/a "Felicia Anne Davis,"  
a/k/a "Felicia Anne Frey,"

devised and intended to devise a scheme to defraud FAI 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:

8. Defendant FELICIA ANNE STRAUB used her FAI office manager position to access FAI's PNC business checking account and fraudulently make payments from it to pay her husband's Chase personal credit card account

9. Defendant FELICIA ANNE STRAUB used her FAI business credit card to make unauthorized purchases of goods and services for her personal benefit, causing wire transfers of money from CitiBusiness (Citi) to businesses that provided her with these services and goods.

10. From around September 5, 2006 to December 26, 2010, defendant FELICIA ANNE STRAUB misappropriated FAI funds of at least \$561,579.39.

11. From on or about the following dates, in the Eastern District of Pennsylvania, and elsewhere, defendant

**FELICIA ANNE STRAUB,  
a/k/a "Felicia Anne Davis,"  
a/k/a "Felicia Anne Frey,"**

for the purpose of executing the scheme described above, and attempting to do so, and aiding and abetting its execution, knowingly caused to be transmitted in interstate commerce, by means of wire communication, certain signs, signals and sounds, namely, a wire transfer of funds, as described, each transmission constituting a separate count:

<b>COUNT</b>	<b>APPROX. DATE OF WIRE</b>	<b>Straub's Conduct – In Furtherance of Scheme to Defraud</b>
1	October 3, 2009	A wire transfer using the FAI credit card (CitiBusiness Platinum Select credit card 1696) for a \$237.42 payment to Blue Grillhouse/Wine Bar, Bethlehem, Pennsylvania.
2	November 5, 2009	A wire transfer of \$3,145.00 from FAI's PNC business bank checking account 2773 to Straub's husband's Chase credit card account 0580.
3	December 18, 2009	A wire transfer of \$190.00 from FAI credit card (CitiBusiness Platinum Select credit card 4216 belonging to A.V.) to PayPal for an eBay purchase made by Straub.

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

**COUNT FOUR**  
**(Aggravated Identity Theft)**

**THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:**

1. Paragraphs One through Eleven of Counts One through Three are incorporated here.
2. On or about December 18, 2009, in Whitehall, in the Eastern District of Pennsylvania, and elsewhere, defendant

**FELICIA ANNE STRAUB,**  
a/k/a "Felicia Anne Davis,"  
a/k/a "Felicia Anne Frey,"

knowingly and without lawful authority, transferred, possessed and used a means of identification of another person, that is, the name and credit card information of A.V., during and in relation to wire fraud.

In violation of Title 18, United States Code, Sections 1028A(a)(1), (c)(11).

**COUNT FIVE**  
**(Tax Evasion)**

**THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:**

1. Paragraphs One through Eleven of Counts One through Three and Count Four are incorporated here.

2. On or about April 15, 2010, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendant

**FELICIA ANNE STRAUB,**  
a/k/a "Felicia Anne Davis,"  
a/k/a "Felicia Anne Frey,"

a resident of Easton, Pennsylvania, who during the calendar year 2009 was married, willfully attempted to evade and defeat a large part of the income tax due and owing by her to the United States of America for the calendar year 2009, by filing and causing to be filed with the Director, Internal Revenue Service Center, at Philadelphia, Pennsylvania, a false and fraudulent U.S. head of household income tax return, Form 1040, on behalf of herself, in which it was stated that her taxable income was the sum of \$ 28,500.00, and that the amount of tax due and owing was the sum of \$1,681.00, but as she then well knew and believed, her taxable income was the sum of approximately \$180,159.00, upon which there was owing to the United States of America an additional income tax of approximately \$44,089.00.

In violation of Title 26, United States Code, Section 7201.

**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, as set forth in Counts One through Five of this Information, defendant

**FELICIA ANNE STRAUB,  
a/k/a "Felicia Anne Davis,"  
a/k/a "Felicia Anne Frey,"**

shall forfeit to the United States of America all property, real or personal, involved in the commission of the offenses and all property traceable to such property, including, but not limited to the sum of \$667,944.96.

1. 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 to 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 subdivided 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 2641(c).

  
ZANE DAVID MEMEGER  
UNITED STATES ATTORNEY