

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

|                          |   |                                    |
|--------------------------|---|------------------------------------|
| UNITED STATES OF AMERICA | ) |                                    |
|                          | ) | No.                                |
| v.                       | ) |                                    |
|                          | ) |                                    |
| SHARI L. HANSEN,         | ) | Violation: Title 18, United States |
| ERIC V. MURFF, and       | ) | Code, Section 1343                 |
| DEBRA A. SCHULTZ         | ) |                                    |

**COUNT ONE**

The SPECIAL FEBRUARY 2014 GRAND JURY charges:

1. At times material to this Indictment:

a. Organization A was a not-for-profit organ procurement organization that coordinated organ and tissue donation in Illinois and northwest Indiana.

b. Defendant SHARI L. HANSEN worked for Organization A as an auditing coordinator, in which role she was responsible for reviewing and approving invoices submitted by physicians who contracted with Organization A to engage in organ and tissue procurement.

c. Defendant ERIC V. MURFF, defendant DEBRA A. SCHULTZ, and Individual A did not work for Organization A, nor was any one a doctor licensed to practice medicine in Illinois.

d. Individual A was the child of defendant DEBRA A. SCHULTZ.

2. Beginning no later than in or about March 2008, and continuing until at least in or about April 2010, at Elmhurst, in the Northern District of Illinois, Eastern Division, and elsewhere,

SHARI L. HANSEN,  
ERIC V. MURFF, and  
DEBRA A. SCHULTZ,

defendants herein, devised, intended to devise, and participated in a scheme to defraud and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, which scheme is further described below.

3. It was part of the scheme that defendants SHARI L. HANSEN, ERIC V. MURFF, and DEBRA A. SCHULTZ created and caused to be created false and fraudulent invoices submitted to Organization A seeking payment for organ and tissue procurement work that they knew was not actually performed. Each false invoice specified that either defendant MURFF or Individual A purportedly performed the organ and tissue procurement at issue. Defendant HANSEN submitted or caused to be submitted these false invoices to Organization A, well knowing at the time that no actual organ and tissue procurement work had been performed by defendant MURFF or Individual A.

4. It was further part of the scheme that each invoice submitted to Organization A by defendant SHARI L. HANSEN for work purportedly provided by defendant ERIC V. MURFF and Individual A stated that defendant MURFF and Individual A each was a medical doctor, or “M.D.,” when in fact, defendants HANSEN, MURFF, and DEBRA A. SCHULTZ knew that defendant MURFF and Individual A were not doctors or otherwise licensed or trained to conduct any organ and tissue procurement.

5. It was further part of the scheme that defendant SHARI L. HANSEN, as part of her employment with Organization A, authorized and directed Organization A to make a payment pursuant to each false invoice purportedly from defendant ERIC V. MURFF and Individual A, knowing that such authorizations fraudulently induced Organization A to make the sought payments.

6. It was further part of the scheme that defendant ERIC V. MURFF received the checks sent to him by Organization A and deposited and caused to be deposited these checks into one or more bank accounts held in his name.

7. It was further part of the scheme that defendant DEBRA A. SCHULTZ deposited and caused to be deposited checks made payable to Individual A into one or more bank accounts held jointly in the names of Individual A and defendant SCHULTZ. After Organization A checks were deposited into these accounts, defendant SCHULTZ transferred the funds into one or more bank accounts held in her name.

8. It was further part of the scheme that defendants ERIC V. MURFF and DEBRA A. SCHULTZ transferred funds in their bank accounts fraudulently obtained from Organization A to one or more bank accounts held in the name of defendant SHARI L. HANSEN.

9. It was further part of the scheme that defendants SHARI L. HANSEN, ERIC V. MURFF, and DEBRA A. SCHULTZ fraudulently converted to their own benefit the funds obtained from Organization A.

10. It was further part of the scheme that defendants SHARI L. HANSEN, ERIC V. MURFF, and DEBRA A. SCHULTZ misrepresented, concealed, and hid, and caused to be misrepresented, concealed, and hidden, acts done in furtherance of the scheme and the purposes of those acts.

11. On or about August 21, 2009, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

SHARI L. HANSEN and  
ERIC V. MURFF,

defendants herein, for the purpose of executing the above-described scheme, did knowingly transmit and cause to be transmitted by means of wire communications in interstate commerce, certain writings, signs, and signals, namely, the electronic transfer from Bank of America's offices in Illinois to Bank of America's offices in Texas of a cash letter bearing sequence number 9120004015 dated August 21, 2009, containing funds to be paid pursuant to Organization A check number 135297;

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

## **COUNT TWO**

The SPECIAL FEBRUARY 2014 GRAND JURY further charges:

1. Paragraphs 1 through 10 of Count One are incorporated here.
2. On or about September 25, 2009, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

SHARI L. HANSEN and  
DEBRA A. SCHULTZ,

defendants herein, for the purpose of executing the above-described scheme, did knowingly transmit and cause to be transmitted by means of wire communications in interstate commerce, certain writings, signs, and signals, namely, the electronic transfer from Bank of America's offices in Illinois to Bank of America's offices in Texas of a cash letter bearing sequence number 8620336669 dated September 25, 2009, containing funds to be paid pursuant to Organization A check number 136023;

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

### **COUNT THREE**

The SPECIAL FEBRUARY 2014 GRAND JURY further charges:

1. Paragraphs 1 through 10 of Count One are incorporated here.
2. On or about October 22, 2009, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

SHARI L. HANSEN and  
ERIC V. MURFF,

defendants herein, for the purpose of executing the above-described scheme, did knowingly transmit and cause to be transmitted by means of wire communications in interstate commerce, certain writings, signs, and signals, namely, the electronic transfer from Bank of America's offices in Illinois to Bank of America's offices in Texas of a cash letter bearing sequence number 8920073200 dated October 22, 2009, containing funds to be paid pursuant to Organization A check number 136458;

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

#### **COUNT FOUR**

The SPECIAL FEBRUARY 2014 GRAND JURY further charges:

1. Paragraphs 1 through 10 of Count One are incorporated here.
2. On or about November 10, 2009, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

SHARI L. HANSEN and  
DEBRA A. SCHULTZ,

defendants herein, for the purpose of executing the above-described scheme, did knowingly transmit and cause to be transmitted by means of wire communications in interstate commerce, certain writings, signs, and signals, namely, the electronic transfer from Bank of America's offices in Illinois to Bank of America's offices in Texas of a cash letter bearing sequence number 8820996481 dated November 10, 2009, containing funds to be paid pursuant to Organization A check number 136829;

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

**COUNT FIVE**

The SPECIAL FEBRUARY 2014 GRAND JURY further charges:

1. Paragraphs 1 through 10 of Count One are incorporated here.
2. On or about January 7, 2010, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

SHARI L. HANSEN and  
DEBRA A. SCHULTZ,

defendants herein, for the purpose of executing the above-described scheme, did knowingly transmit and cause to be transmitted by means of wire communications in interstate commerce, certain writings, signs, and signals, namely, the electronic transfer from Bank of America's offices in Illinois to Bank of America's offices in Texas of a cash letter bearing sequence number 8720460200 dated January 7, 2010, containing funds to be paid pursuant to Organization A check number 137926;

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

## COUNT SIX

The SPECIAL FEBRUARY 2014 GRAND JURY further charges:

1. Paragraphs 1 through 10 of Count One are incorporated here.
2. On or about January 21, 2010, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

SHARI L. HANSEN and  
ERIC V. MURFF,

defendants herein, for the purpose of executing the above-described scheme, did knowingly transmit and cause to be transmitted by means of wire communications in interstate commerce, certain writings, signs, and signals, namely, the electronic transfer from Bank of America's offices in Illinois to Bank of America's offices in Texas of a cash letter bearing sequence number 8720501076 dated January 21, 2010, containing funds to be paid pursuant to Organization A check number 138239;

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

## **FORFEITURE ALLEGATION**

The SPECIAL FEBRUARY 2014 GRAND JURY alleges:

1. The allegations contained in this Indictment are incorporated here for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c).

2. As a result of their violations of Title 18, United States Code, Section 1343, as alleged in this Indictment,

SHARI L. HANSEN,  
ERIC V. MURFF, and  
DEBRA A. SCHULTZ,

defendants herein, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c), any right, title, and interest that they may have in any property, real and personal, which constitutes and is derived from proceeds traceable to the charged offense.

3. The interests of defendants subject to forfeiture pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c), that represent property constituting gross proceeds derived as a result of these violations include, but are not limited to, funds in the amount of approximately \$652,298.

4. If any of the property subject to forfeiture and described above, as a result of any act or omission by defendants:

- 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 28, United States Code, Sections 2461(c);

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

A TRUE BILL:

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FOREPERSON

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UNITED STATES ATTORNEY