## UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF ILLINOIS WESTERN DIVISION

| UNITED STATES OF AMERICA | )                             |
|--------------------------|-------------------------------|
|                          | )                             |
| v.                       | ) No                          |
|                          | ) Violation: Title 18, United |
| KAYLA C. BERGSTROM       | ) States Code, Section 656    |

## The JULY 2014 GRAND JURY charges:

- 1. At times material to this indictment:
- a. First State Bank Shannon-Polo ("First State Bank") was a financial institution with branches located in Polo and Shannon, Illinois.
- b. KAYLA C. BERGSTROM was an employee and an officer, First Vice-President, of First State Bank. As a vice-president, she had the highest security level assigned in the bank's software program which controlled all customer bank accounts, the bank's general ledger accounts, adding new accounts, and the maintenance of all bank accounts. BERGSTROM's responsibilities as a vice-president included reconciling all of the bank's correspondent accounts including the bank's correspondent account with US Bank.

c. Bergstrom embezzled money from First State Bank by creating cash advance tickets for the bank's correspondent account at US Bank ("US Bank account") and crediting the amounts of the cash advance tickets to her personal account and the business account for her husband's automobile repair business.

d. Bergstrom concealed her embezzlement by changing the balances on the bank's US Bank account statements by manually cutting and pasting false account balances on the statements.

2. Between February 23, 2010, and February 3, 2014, at Polo, in the Northern District of Illinois, Western Division, and elsewhere,

## KAYLA C. BERGSTROM,

defendant herein, being an officer and employee of First State Bank, the deposits of which were then insured by the Federal Deposit Insurance Corporation, with intent to injure and defraud said bank, did embezzle, abstract, and purloin \$59,560.88 belonging to and intrusted to the custody and care of said bank;

In violation of Title 18, United States Code, Section 656.

**UNITED STATES ATTORNEY** 

| in violation of Title 18, United States Code, Section 656. |
|--|
| A TRUE BILL:   |
|  |
| FOREPERSON   |
|  |