

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
WESTERN DIVISION

UNITED STATES OF AMERICA)
)
) v.) No. _____
) Violations: Title 18, United States
SALLY A. CLAASSEN) Code, Section 666(a)(1)(A)

COUNT ONE

The UNITED STATES ATTORNEY charges:

1. At times material to this information:

a. Winnebago County was a local government located in the Northern District of Illinois.

b. Winnebago County received in excess of \$10,000 in federal funding in calendar years 2014 and 2015.

c. Defendant SALLY A. CLAASSEN was an employee of Winnebago County from March 3, 1997, until she resigned on September 11, 2015. CLAASSEN's job title prior to her resignation was Purchasing Director. CLAASSEN was an agent of Winnebago County during the entirety of her employment with the County.

d. As Purchasing Director, CLAASSEN was responsible for receiving invoices submitted by vendors to Winnebago County, reviewing invoices for accuracy, and submitting payments to vendors.

e. CLAASSEN held a Winnebago County-issued credit card that she was authorized to use to make purchases for official Winnebago County business. CLAASSEN was required to submit invoices and supporting documentation to Winnebago County to demonstrate that items purchased were for Winnebago County business.

f. CLAASSEN also had the ability to purchase items for Winnebago County by requesting that Winnebago County issue a check to a particular vendor. CLAASSEN was required to submit invoices and supporting documentation to Winnebago County to demonstrate that the requested check was to be used to purchase items for Winnebago County business.

2. On various occasions beginning on or about February 24, 2014, through December 31, 2014, at Rockford, in the Northern District of Illinois, Western Division, and elsewhere,

SALLY A. CLAASSEN,

defendant herein, as an agent and employee of Winnebago County, a local government that received in excess of \$10,000 in federal funding in the twelve-month period from January 1, 2014, through December 31, 2014, embezzled, stole, obtained by fraud, and without authority knowingly converted to her own use and intentionally misapplied, at least \$5,000, that was owned by, or was under the care, custody, and control of Winnebago County.

In violation of Title 18, United States Code, Section 666(a)(1)(A).

COUNT TWO

The UNITED STATES ATTORNEY further charges:

1. Paragraph 1 of Count One is incorporated here.
2. On various occasions from the beginning of 2015, through on or about July 1, 2015, at Rockford, in the Northern District of Illinois, Western Division, and elsewhere,

SALLY A. CLAASSEN,

defendant herein, as an agent and employee of Winnebago County, a local government that received in excess of \$10,000 in federal funding in the twelve-month period from January 1, 2015, through December 31, 2015, embezzled, stole, obtained by fraud, and without authority knowingly converted to her own use and intentionally misapplied, at least \$5,000, that was owned by, or was under the care, custody, and control of Winnebago County.

In violation of Title 18, United States Code, Section 666(a)(1)(A).

FORFEITURE ALLEGATION

The UNITED STATES ATTORNEY further alleges:

1. The allegations contained in this information 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 the violations of Title 18, United States Code, Section 666(a)(1)(A), as alleged in the information,

SALLY A. CLAASSEN,

defendant 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), all property constituting, and derived from, and traceable to, proceeds obtained, directly or indirectly, as a result of defendant's violation of Title 18, United States Code, Section 666(a)(1)(A), including approximately \$451,353, which includes approximately \$292,525 in funds already seized by the United States.

3. If any of the forfeitable property described above, as a result of any act or omission by the defendant:

- 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 18, United States Code, Section 982(b)(1).

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

UNITED STATES ATTORNEY