

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
WESTERN DIVISION

UNITED STATES OF AMERICA)
) No. _____
 vs.) Violations: Title 18, United States Code,
) Section 1341 and Title 26, United States
LEILANI HILLIS) Code, Section 7206

COUNT ONE

The UNITED STATES ATTORNEY charges:

1. At times material to this information:

a. Organization A was a non-profit organization whose mission it was to attract, retain and expand jobs in the Rockford, Illinois area. Organization A received funding from private sources and local governments.

b. Defendant LEILANI HILLIS started working for Organization A in 2001. Since 2001, HILLIS was an administrative assistant, an executive assistant, and, as of 2018, the director of operations for Organization A.

c. Defendant LEILANI HILLIS handled payroll, human resource matters, accounting, and oversaw the annual audit for Organization A. As of 2009, HILLIS had signatory authority on Organization A's bank account. Defendant HILLIS also had access to Organization A's PayPal account.

d. Organization A issued employees, including defendant LEILANI HILLIS, a credit card in the employee's name. Each month, Organization A received a statement containing the charges made by each employee. Defendant LEILANI HILLIS created a monthly credit card expense report that included all employee credit card expenses for Organization A.

2. From at least as early as 2009, and continuing to at least April 2018, in Rockford,

within the Northern District of Illinois, Western Division, and elsewhere:

LEILANI HILLIS,

defendant herein, knowingly devised, and intended to devise, and participated in a scheme to defraud Organization A and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, and by concealment of materials facts, which scheme is more fully set out below.

3. It was the object of the scheme that defendant LEILANI HILLIS would and did enrich herself by obtaining at least approximately \$630,000 in money from Organization A which she used for her own benefit without Organization A's knowledge or consent.

4. It was a part of the scheme that between 2009 and 2018, defendant LEILANI HILLIS made numerous unauthorized purchases in Rockford, Illinois, and elsewhere, for her personal benefit with the credit card issued to her by Organization A.

5. It was further a part of the scheme that between 2009 and 2018, defendant LEILANI HILLS made numerous unauthorized online purchases for her personal benefit with the credit card issued to her by Organization A through Organization A's PayPal account.

6. It was further a part of the scheme that defendant LEILANI HILLIS concealed her unauthorized purchases by using Organization A's accounting codes to make it appear that the purchases were for the benefit of Organization A.

7. It was further a part of the scheme that defendant LEILANI HILLIS created monthly credit card expense reports and forged on the expense reports the initials of Organization A's president.

8. It was further a part of the scheme that defendant LEILANI HILLIS issued, or

caused to be issued, and signed monthly checks from Organization A to Bank A, the issuer of Organization A's credit cards. HILLIS signed the checks knowing that the payment to Bank A included money to pay for HILLIS's unauthorized purchases made with Organization A's credit card.

9. It was further part of the scheme that defendant did misrepresent, conceal, and hide, and caused to be misrepresented, concealed, and hidden, acts done in furtherance of the scheme and the purpose of those acts.

10. On or about March 7, 2018, at Rockford, Illinois, in the Northern District of Illinois, Western Division,

LEILANI HILLIS,

defendant herein, for the purpose of executing the scheme to defraud and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, knowingly placed or caused to be placed in an authorized depository for mail matter, to be sent by United States mail according to the directions thereon, an envelope addressed to Bank A at an address in St. Louis, Missouri, containing a \$13,773.31 check issued by Organization A and signed by defendant;

In violation of Title 18, United States Code, Section 1341.

COUNT TWO

The UNITED STATES ATTORNEY further charges:

1. Paragraph 1 of this information is incorporated here.

2. On or about February 15, 2018, at Rockford, Illinois, in the Northern District of Illinois, Western Division,

LEILANI HILLIS,

defendant herein, willfully made and subscribed, and caused to be made and subscribed, an United States Individual Income Tax Return (Form 1040 with schedules and attachments), for the calendar year 2017, which return was verified by written declaration that it was made under the penalties of perjury and was filed with the Internal Revenue Service, which return defendant did not believe to be true and correct as to every material matter, in that it was stated on Form 1040, line 22, that defendant's total income was \$76,552, when defendant knew and believed that her total income substantially exceeded that amount;

In violation of Title 26, United States Code, Section 7206(1).

UNITED STATES ATTORNEY