

FILED
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THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

1:20-CR-00938

UNITED STATES OF AMERICA)
)
 v.)
)
 MILDRED H. CROWLEY)

No.

JUDGE BUCKLO
MAGISTRATE JUDGE VALDEZ

Violation: Title 18, United States
Code, Section 1343

The UNITED STATES ATTORNEY charges:

1. At times material to this Information:

a. Defendant MILDRED H. CROWLEY worked as the Office Manager at Company A, an Illinois corporation located in Lemont, Illinois that operated as a blasting contractor in the construction industry. As the Office Manager, CROWLEY's job responsibilities included managing Company A's books and records and using funds in Company A's bank account at Bank A to pay Company A's bills, including Company A's corporate credit card bills.

b. Individual A resided in Lemont, Illinois, and was the owner of Company A.

c. Company A had a corporate bank account at Bank A and a corporate credit card with Bank B.

d. Company A paid CROWLEY an annual salary, and the amount of her salary was determined by Individual A.

e. CROWLEY's job responsibilities did not include using a corporate credit card for purchases for Company A's benefit.

2. Beginning in or about September 2009, and continuing until in or about January 2020, in the Northern District of Illinois, Eastern Division, and elsewhere,

MILDRED H. CROWLEY,

defendant herein, knowingly devised, intended to devise, and participated in a scheme to defraud, and to obtain money and property from Company A by means of materially false and fraudulent pretenses, representations, and promises, and by concealment of material facts, which scheme is further described below.

3. It was part of the scheme that CROWLEY, while working as the Office Manager at Company A, stole more than \$2.3 million of Company A's funds to pay for personal expenses related to her private horse farm and her show horse, as well as to pay for meals at restaurants, department store purchases, and travel throughout the United States.

4. It was further part of the scheme that on or about July 16, 2009, CROWLEY contacted Bank B, where Company A had a corporate credit card account, and directed Bank B to issue a Company A corporate credit card in CROWLEY's name, knowing that Individual A had not authorized her to open a Company A corporate credit card in her name.

5. It was further part of the scheme that between in or about September 2009 and in or about January 2020, CROWLEY used the unauthorized Company A credit card issued in her name to pay personal expenses totaling more than \$2.2 million, knowing that Individual A had not authorized her to open the Company A corporate credit card in her name or use it to pay her personal expenses.

6. It was further part of the scheme that between in or about September 2009 and in or about January 2020, CROWLEY used more than \$2.2 million in funds from Company A's bank account at Bank A to pay for her unauthorized credit card expenses, knowing that she was prohibited from using Company A funds to pay for those purchases she had made using that Company A corporate credit card.

7. It was further part of the scheme that CROWLEY falsified Company A's books and records to misrepresent to Company A and Individual A her use of the unauthorized Company A corporate credit card account and her use of Company A funds to pay for the unauthorized purchases she had made using that corporate credit card. Specifically, after printing and issuing Company A checks payable to Bank B for payment of her unauthorized corporate credit card purchases, CROWLEY falsified the Company A books and records to misrepresent that the checks had been used to pay legitimate Company A vendors.

8. It was further part of the scheme that CROWLEY caused Bank B to send the monthly statements for the unauthorized Company A corporate credit card directly to her, knowing that Individual A had not authorized her to open that corporate credit card in her name or use it to pay her personal expenses. Further, after receiving the monthly statements for that corporate credit card, CROWLEY concealed from Company A and Individual A her purchases made with that corporate credit card by failing to store those statements in Company A's files, where she stored the corporate credit card statements for authorized corporate credit cards issued by Bank B.

9. It was further part of the scheme that in or about 2019, CROWLEY misrepresented to Individual A that Company A's net loss of \$77,000 during fiscal year 2018 was caused by Company A's payment of higher wages to union workers and purchases of certain equipment, when in fact CROWLEY knew that Company A's fiscal year 2018 loss was due to CROWLEY's misappropriation of more than \$300,000 of funds from Company A's bank account at Bank A, which funds CROWLEY knew she had used to pay for her unauthorized corporate credit card purchases during 2018.

10. It was further part of the scheme that, during her employment at Company A, CROWLEY issued checks to herself from Company A's bank account at Bank A totaling more than \$100,000, and she used those funds to pay her personal expenses, knowing that Individual A had not authorized her to issue checks to herself or otherwise use Company A funds to pay her personal expenses.

11. It was further part of the scheme that CROWLEY concealed, misrepresented, and hid, and caused to be concealed, misrepresented, and hidden, the existence and purpose of the scheme and the acts done in furtherance of the scheme.

12. On or about December 4, 2019, at Lemont, in the Northern District of Illinois, Eastern Division, and elsewhere,

MILDRED H. CROWLEY,

defendant herein, for the purpose of executing the scheme, knowingly caused to be transmitted by wire communication in interstate commerce certain writings, signs,

and signals, namely, the deposit of a Company A check in the amount of \$3,895.25, at a branch of Bank B, for the payment of defendant's unauthorized purchases using a corporate credit card issued by Bank B, which corporate credit card defendant opened in her name and used to pay her personal expenses, without Company A's knowledge or consent;

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

FORFEITURE ALLEGATION

The UNITED STATES ATTORNEY further 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 the violations of Title 18, United States Code, Section 1343, as alleged in Count One of this information,

MILDRED H. CROWLEY,

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 violations of Title 18, United States Code, Section 1343, including approximately \$2,399,046.

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

JASON YONAN Digitally signed by JASON YONAN
Date: 2020.12.29 13:22:28 -06'00'

Signed by Jason Yonan on behalf of the
UNITED STATES ATTORNEY