

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
WESTERN DIVISION

UNITED STATES OF AMERICA)
)
) No. _____
) vs. Violation: Title 18, United States Code,
) Section 1343
TAMMY E. MOORE)

The UNITED STATES ATTORNEY charges:

1. At times material to this information:

a. Company A was a computer numerical control shop located in Loves Park, Illinois, that made custom components for a variety of industries.

b. Defendant TAMMY E. MOORE was the office manager for Company A. As the office manager, defendant MOORE's responsibilities included, among other things, handling the accounts payable and accounts receivable. Defendant MOORE and the owner of Company A were the only two Company A employees who had access to Company A's bank accounts.

c. Bank A was a bank located in Rockford, Illinois. Defendant TAMMY E. MOORE's husband had a business account at Bank A to which defendant MOORE had access. Defendant MOORE and her husband also had a personal checking account at Bank A to which defendant MOORE had access.

d. Corporation A was a financial services company based in Dubuque, Iowa, and was the parent for Bank A. All transfers between accounts at Bank A in Rockford, Illinois went through Corporation A in Dubuque, Iowa.

2. From at least as early as 2012, and continuing to at least October 2,

2020, in Rockford and Loves Park, in the Northern District of Illinois, Western Division, and elsewhere,

TAMMY E. MOORE,

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, which scheme is more fully set out below.

3. It was the object of the scheme that defendant TAMMY E. MOORE would and did enrich herself by obtaining more than \$1,000,000 in money from Company A which funds she used for her own benefit without Company A's knowledge or consent.

4. It was a part of the scheme that between 2012 and 2020, defendant TAMMY E. MOORE fraudulently issued numerous checks to herself and to her husband's business from Company A's bank account, which checks defendant MOORE deposited into her personal bank account and her husband's business account at Bank A for her personal benefit.

5. It was further part of the scheme that defendant TAMMY E. MOORE forged the signature of Company A's owner on the checks that defendant MOORE wrote to herself or to her husband's business.

6. It was further part of the scheme that defendant TAMMY E. MOORE 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. For

example, defendant MOORE issued checks from Company A's account to her husband's company to make it appear that the checks were for legitimate business purposes. After she deposited the checks in her husband's business account at Bank A, defendant MOORE executed online account transfers and moved the money from her husband's business account at Bank A to her personal account at Bank A. Defendant MOORE also deleted in Company A's system the checks that she issued to herself or to her husband's company in order to conceal her use of the checks, and defendant MOORE created false invoices to make it appear that the checks were for normal business expenditures for Company A.

7. On or about October 1, 2020, at Rockford and Loves Park, Illinois, in the Northern District of Illinois, Western Division,

TAMMY E. MOORE,

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 caused to be transmitted in interstate commerce by means of wire communication, certain writings, signs, and signals, namely, a \$2,800 online transfer from Company A, from defendant's husband's business account at Bank A in Rockford, Illinois, to Corporation A in Dubuque, Iowa, and then to defendant's personal bank account at Bank A in Rockford, Illinois;

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

UNITED STATES ATTORNEY