

**IN THE UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF ILLINOIS
URBANA DIVISION**

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
v.)
)
ASHLEY MILLER,)
)
Defendant.)

Criminal No. 17-CR- *20015*
Title 18, United States Code,
Section 1341.

FILED

FEB 27 2017

INFORMATION

COUNT ONE
(Mail Fraud)

CLERK OF THE COURT
U.S. DISTRICT COURT
CENTRAL DISTRICT OF ILLINOIS
URBANA, ILLINOIS

THE ACTING UNITED STATES ATTORNEY CHARGES:

1. From about 2008 and continuing through about April of 2012, in Edgar County, in the Central District of Illinois and elsewhere, the defendant,

ASHLEY MILLER,

knowingly devised a scheme and artifice to defraud and for obtaining money and property by means of materially false and fraudulent pretenses, representations and promises.

Background

2. At all times material to this Information, the defendant resided in Edgar County, Illinois.

3. Between 2008 and 2012, the defendant was employed by the East Central Illinois Mass Transit District (ECIMTD). The ECIMTD was a governmental body

created to serve the transportation needs of the citizens of Edgar County, Illinois. To serve those needs, the ECIMTD received grants from the Federal Transit Administration (FTA). All of the grants received by the ECIMTD from the FTA were to be expended for purposes related to providing transportation services to the citizens of Edgar County, Illinois. **The expenditure of grant monies to satisfy the personal expenses of ECIMTD employees was not permitted.**

4. In 2008, the defendant was granted access to a credit card issued by Capital One (the card) for use in furtherance of her employment duties. Defendant was authorized to incur charges through use of the card for ECIMTD related expenses. Expenses incurred on the card by Defendant were paid monthly by the ECIMTD through the expenditure of grant monies.

The Scheme to Defraud

5. As part of the scheme, the defendant **used the card on a monthly basis for personal expenses entirely unrelated to any employment purpose.** The defendant incurred personal expenses **for food, entertainment and items for the support of her family.** Examples include the **purchase of decorative candles, children's clothes, children's toys and personal clothing items for the defendant.**

6. As a further part of the scheme, defendant caused materially false and fraudulent representation to be made to employees of the ECIMTD responsible for completing monthly payment on the card by either representing that the personal expenses were related to the official purposes of the ECIMTD or, in the alternative, that

she had personally reimbursed the ECIMTD for non-work related purchases. Further, Defendant represented in writing that she always reimbursed personal expenses incurred on the card on a monthly basis in response to an inquiry regarding her use of the card. **Defendant made these representations knowing them to be false.**

Execution of the Scheme

7. On or about February 23, 2012, in Edgar County, in the Central District of Illinois and elsewhere, for the purpose of executing or attempting to execute the above-described scheme and artifice to defraud and deprive, the defendant,

ASHLEY MILLER

knowing that it would actually occur and that it would occur in the normal course of business and that it could be reasonably foreseen, caused to be delivered by the United States Postal Service according to the direction thereon, an envelope mailed to Capital One and mailed from the ECIMTD in Paris, Illinois;

All in violation of Title 18, United States Code, Section 1341.

PATRICK D. HANSEN
ACTING UNITED STATES ATTORNEY

s/John E. Childress/by Eugene Miller

~~John E. Childress~~
John E. Childress by Eugene L. Miller
Assistant United States Attorney