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Clerk, U.S. District Court, ILCD

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

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

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	Criminal No. 17-CR-20042
)	Title 18, United States Code,
KAMI MILLER,)	Section 1341.
)	
Defendant.)	

INFORMATION

COUNT ONE

(Mail Fraud)

THE ACTING UNITED STATES ATTORNEY CHARGES:

1. From about January of 2009 and continuing through about March of 2012, in Edgar County, in the Central District of Illinois and elsewhere, the defendant,

KAMI MILLER,

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

Background

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

3. Between January of 2009 and March of 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. Starting in 2009, the defendant had access to a credit card issued by Capital One (the card), bearing the name of the ECIMTD, for use in furtherance of her employment duties. Expenses incurred on the card by Defendant were paid monthly, in full or in part, by the ECIMTD through the expenditure of grant monies.

5. Also from 2009 to 2012, defendant had the authority to direct the disbursement of funds by the ECIMTD to third parties. Those disbursements by the ECIMTD were made through the expenditure of grant monies.

The Scheme to Defraud

6. As part of the scheme from January of 2009 to March of 2012, the defendant used the card on a monthly basis for personal expenses entirely unrelated to any employment purpose. For example, the defendant incurred personal expenses for food, travel and other personal items.

7. As a further part of the scheme, the defendant caused the ECIMTD to make multiple disbursements to an individual retirement account in her name and for her benefit knowing that she was not entitled to the benefit of those payments.

8. As a further part of the scheme, defendant caused materially false and fraudulent representations to be made to the ECIMTD and did conceal her actions from the ECIMTD by authorizing monthly payments on the card and thereby representing that expenditures made or authorized by her were solely work related and by concealing from the ECIMTD the disbursements made to the individual retirement account on her behalf.

Execution of the Scheme

9. No earlier than March 25, 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 the defendant,

KAMI MILLER

caused to be delivered by the United States Postal Service according to the direction thereon, an

envelope mailed to Capital One for payment 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 L. Miller

John E. Childress
Assistant United States Attorney