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IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION

THOMAS M. GOULD
CLERK, U.S. DISTRICT COURT
W.D. OF TN. MEMPHIS

UNITED STATES OF AMERICA,)
)
 Plaintiff,)
)
 vs.)
)
 KATRINA LYNN SEARS,)
)
 Defendant.)

15-20251
Criminal No.: 15-I-30 STA

18 U.S.C. § 1702

INFORMATION

THE UNITED STATES ATTORNEY CHARGES:

At all times relevant herein:

1.

JabberBlabber, Inc. ("JBI") was a magazine company located in Memphis, Tennessee that produced a free, hands-on creative publication for children.

2.

The defendant, **KATRINA LYNN SEARS**, was employed as an accounts receivable clerk at JBI from about February 2008 until about February 28, 2014. **SEARS'** responsibilities included managing JBI's accounts receivable and accounts payable and performing routine clerical duties.

3.

As the accounts receivable clerk, **SEARS** was authorized to receive and open letters delivered to JBI by the United States Postal Service and private mail carriers. If a letter contained a check payable to JBI or its sister company, Graffiti Graphics,

SEARS was expected to record the payment into the company's QuickBooks accounting software program and then give the check to the designated staff member for subsequent deposit or other action. **SEARS** was not authorized to conduct any banking transactions on JBI's behalf, including deposits and withdrawals.

4.

Paragraphs 1 through 3 are incorporated into Count 1 of this Information as if fully stated therein.

COUNT 1

(Obstruction of Correspondence)

5.

Between on or about December 10, 2010 and continuing until on or about February 28, 2014, in the Western District of Tennessee, the defendant,

KATRINA LYNN SEARS

did, with design to obstruct correspondence, open, secrete, embezzle, and destroy approximately 152 letters containing checks made payable to and addressed to JabberBlabber, Inc., 1985 Madison Avenue, #7, Memphis, TN, 38104, which letters had been in a post office and an authorized depository for mail matter and in the custody of a mail carrier before said letters had been delivered to the person to whom they were directed, in violation of Title 18, United States Code, Section 1702.

DATED: JUNE 9, 2015



EDWARD L. STANTON III
UNITED STATES ATTORNEY

